

Submission in Opposition



McCallum Brothers Limited — Bream Bay Sand Extraction Proposal

Fast-Track Approvals Act Application

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Submitted by: Waipu Boat & Fishing Club Inc.

Est. 1962

On behalf of 105 members

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Introduction

The Waipu Boat & Fishing Club strongly opposes the application by McCallum Brothers Limited (MBL) to extract up to 8.45 million cubic metres of sand from the seabed of Te Ākau Bream Bay over the next 35 years.

Our club has operated in Bream Bay since 1962. For over 60 years, members have fished, dived, and recreated in the area affected by this proposal, giving us deep, firsthand knowledge and a strong interest in its ecological future. This submission outlines the environmental, ecological, cultural, and economic reasons the proposal should be declined.

The proposed dredging area covers approximately 17 km² of seabed, as close as 4.2 km from the shoreline, directly offshore from the communities of Ruakākā, Uretiti, Waipu, and Langs Beach. At full operation, MBL would extract up to 250,000 cubic metres of sand per year, operating up to five days a week, for over three decades.

This is not a minor activity but a long-term industrialisation of one of Northland's most ecologically and culturally significant coastal environments. For the reasons below, it must be refused.

There Is No Demonstrated Need, Alternative Sources Exist

MBL's core justification is that Auckland faces an acute shortage of construction-grade sand. This claim does not withstand scrutiny.

A report commissioned by the Bream Bay Guardians (BBG) and prepared by engineering firm BECA has found that Auckland's available sand supply significantly exceeds current demand. Independent research cited in the debate similarly indicates that alternative and existing sand sources can meet, and in some cases greatly exceed, Auckland's needs, with no evidence of an actual supply crisis. [\[rnz.co.nz\]](http://rnz.co.nz), [\[endangered...ies.org.nz\]](http://endangered...ies.org.nz)

The findings suggest that Auckland's construction industry is not constrained by a lack of options, but rather is selecting the lowest-cost supply, potentially transferring environmental impacts to Northland's coastline. This raises concerns about the necessity and justification for offshore sand extraction in regions such as Bream Bay, particularly given the availability of land-based and manufactured alternatives. [\[rnz.co.nz\]](http://rnz.co.nz). Refer to the paper being submitted by the Bream Bay Guardians.

Furthermore, viable and more responsible alternatives exist:

- Kaipara Harbour: Sand is being naturally replenished in the Kaipara Harbour, just to the south. Companies are already investing in extraction infrastructure there, in an area where sand dynamics are better understood and where extraction poses far less coastal erosion risk.
- Onshore sand sources: Northland has onshore sand deposits that could be developed with significantly lower ecological impact than open-ocean seabed dredging.

Manufactured sand (Kayasand): A New Zealand company, Kayasand, has developed technology that transforms quarry waste — including crusher dust, recycled glass, concrete, and slag, into high-grade engineered sand suitable for 100% replacement of natural sand in concrete. Independent trials by respected concrete engineer James Mackechnie have shown this engineered sand produces stronger concrete than natural sand, with at least 10% less cement required, reducing carbon emissions by approximately 6,000 tonnes per year per plant. Crucially, there are already three quarries in Northland large enough to host full-scale Kayasand plants. This technology is not theoretical, it has already been used in New Zealand's first fully manufactured-sand commercial floor, and Kayasand has secured major commercial deals in Australia. It creates real, local jobs in Northland rather than extracting a public resource for private profit to an Auckland company. Refer to the James Mackechnie paper being submitted by The Bream Bay Guardians.

The argument that Bream Bay sand is necessary simply does not hold. The real question is whether cheap coastal sand should continue to be preferred over sustainable alternatives that serve long-term regional interests. The answer must be no.

The Scallop Recovery Effort Makes This Proposal a Betrayal of Public Sacrifice

In April 2022, the Northland scallop fishery (SCA 1) was indefinitely closed to all commercial and recreational harvesting. The Bream Bay no-take closure came into effect on 27 October 2022. This closure, now over three years old and with no end date set, was imposed precisely because decades of dredging and over-harvesting had devastated scallop populations. Northland's East Coast scallop beds had fallen 63% in biomass over 13 years.

This closure has imposed real hardship on commercial fishers, recreational fishers, and coastal communities. People have sacrificed both economically and culturally to give the seabed a chance to recover. Scientific surveys identified the Bream Bay scallop bed as one of four in New Zealand most likely to recover, covering 82.3 km², the second largest scallop habitat by area in the entire Northland quota management zone.

The MBL dredging proposal would Hoover up that very seabed. It would physically destroy the substrate on which scallop larvae settle, the crab and shellfish communities that attract snapper, trevally, and gurnard, and the seafloor ecology that the no-take closure was designed to protect. A seafloor dredge does not discriminate, as one eyewitness who worked on sand dredges in Australia described, marine life including crabs, snakes, and turtles is pulverised and discharged as waste.

For the New Zealand Government to ask its fishing communities to bear three-plus years of economic and cultural loss to allow scallop beds to recover, and then to approve industrial vacuum dredging of those same beds, would be an act of extraordinary bad faith. It would make a mockery of every sacrifice made under the closure. The scallop recovery must be protected, not bulldozed.

Global Evidence Shows Marine Sand Mining Destroys Coastlines

Bream Bay does not exist in isolation. The global record of marine sand extraction is one of accelerating coastal erosion, disappearing beaches, and devastated fishing communities. New Zealand should learn from this, not repeat it.

Around the world, island nations — particularly in the Pacific and Indian Oceans — are losing their beaches at alarming rates. The connection between offshore sand dredging and coastal retreat is well-documented: when submarine sand banks that absorb wave energy are removed, the geometry of nearshore water movement changes, and beaches erode at accelerating rates. This is not a distant phenomenon — it is happening in real time to communities whose shores are being literally mined away to supply sand for concrete in wealthier nations like Singapore

Closer to home, the legacy of McCallum Brothers' operations at Pākiri and Mangawhai is instructive. For close to 80 years, those communities bore the cost of sand mining. In 2024, the Environment Court declined MBL's consent applications, finding the company's evidence of ecological effects had been 'patchy', 'inconclusive', and at times 'incorrect'. The Court found impacts on mana whenua could not be mitigated. The costs awarded against MBL, totalling at least \$500,000 and likely more in confidential payments, were among the highest ever ordered by the Environment Court. The Pākiri community described the generational effect as 'a constant blight'.

Now, having lost at Pākiri, MBL has simply moved north to Bream Bay, seeking, in the words of local advocates, 'weaker opposition'. Bream Bay deserves the same protections its southern neighbours fought decades to secure.

The Physical Science Strongly Suggests Beach Erosion Is Inevitable

MBL contends that because the proposed extraction zone is beyond the so-called 'depth of closure' — the theoretical point beyond which sand does not naturally circulate into and out of the beach system — there will be no impact on shorelines. This argument is a standard but highly contested premise in coastal management and should not be accepted without rigorous, independent scrutiny.

The fundamental concern is this: Bream Bay is a semi-enclosed embayment with a complex hydrodynamic system. Sand on the seabed is not static. It moves in response to storm swells, tidal currents, and seasonal wave patterns. When significant volumes of sand are removed from submarine banks, the depth and profile of the seabed changes, altering how waves refract and how energy is dissipated before reaching the shoreline.

Dredging 250,000 cubic metres per year, year after year for 35 years, does not leave a small hole that nature fills in. It creates an expanding depression in the seabed that persists and grows. The cumulative total of 8.45 million cubic metres represents an extraordinary removal of material from a naturally enclosed bay system. Independent coastal geomorphologists, not consultants engaged by the applicant, must model and peer-review what this means for beaches at Uretiti, Ruakākā, Waipu, and Langs Beach.

Residents and local experts have already raised this directly: "They take sand from here it will not refill from outside and then you'll start altering what happens with the waves and the water which will start altering the sand dunes." The dunes at Uretiti are already recognised as a critical coastal buffer. Ruakākā Beach suffered significant storm erosion in 2023. Removing the offshore sand buffer that helps dissipate wave energy is not a neutral act.

The precautionary principle must apply. In the absence of conclusive, independent science demonstrating no erosion risk, approval must be withheld.

The Ecological Destruction Will Be Severe and Long-Lasting

The seabed in the proposed extraction zone is not empty. It supports:

- **Scallop beds in recovery:** As noted above, Bream Bay's scallop habitat is among the most significant remaining in Northland. Dredging destroys the seabed structure on which spat settles. Fisheries New Zealand's own research (such as AEBR Report 342) has identified habitat degradation as the primary barrier preventing scallop recovery nationally. This proposal would inflict exactly that degradation.
- **Crabs, shellfish, and invertebrates:** The seafloor community of crab and shellfish species is what attracts snapper, trevally, gurnard, and other inshore fish. Remove the benthic invertebrate community and you remove the foundation of the local food web. The affected 17 km² zone would effectively become a biological desert, with cascading effects extending well beyond the extraction boundary.
- **Tara iti / New Zealand fairy tern:** The critically endangered tara iti — New Zealand's most endangered bird, with fewer than 50 adults — nests at Waipu Cove, directly adjacent to the proposed extraction site. The tara iti hunts by sight over shallow coastal water. The Department of Conservation has confirmed that increased water turbidity from dredging operations could directly impact the bird's ability to feed. These birds' nest at only five sites in the world, two of which, Mangawhai and Waipu, are immediately adjacent to the proposed mining zone. After two consecutive seasons of cautious recovery, putting this bird's primary feeding habitat at risk is unconscionable.
- **Hawksbill and green turtles:** Critically endangered hawksbill turtles and endangered green turtles have been confirmed in the waters near the proposed extraction site. Both species are already under severe global pressure and any further disturbance to their habitat must be refused.
- **Marine mammals:** Noise, vessel strike risk, and habitat degradation from sustained dredging will impact cetaceans and other marine mammals that use the bay.
- **Sediment toxin release:** Dredging disturbs accumulated sediments that bind heavy metals and hydrocarbons. Resuspension of these contaminants degrades water quality across a wide area, affecting filter feeders, juvenile fish, and the entire benthic ecosystem.

The scale of this operation, five days a week for 35 years, means these effects are not temporary or recoverable on any human timescale. The environmental damage at Pākiri took 80 years of dredging to accumulate and will take decades more to partially recover, if it ever does.

No Real Economic Benefit to Northland

The economic case for this proposal, from Northland's perspective, is essentially non-existent.

The sand will be sold to Auckland's construction industry. The profit flows to an Auckland-based company. There is no credible proposal to create significant local employment in Northland from dredging operations — the work is conducted from vessels. Meanwhile, the costs fall entirely on Northland: the degraded coastline, the lost fishing grounds, the threatened species, the reduced tourism appeal, and the long-term erosion risk.

By contrast, the alternatives, particularly Kayasand's manufactured sand technology, would require quarry processing plants to be established in Northland, creating genuine, permanent local jobs. The Endangered Species Foundation's General Manager has confirmed that Northland already has three quarries large enough to host full-scale Kayasand plants. This represents a real economic opportunity for the region, not a resource extraction operation that enriches an out-of-region company at Northland's expense.

Tourism and recreation along the Bream Bay coast, particularly at Waipu Cove, Langs Beach, Uretiti and Ruakākā, are vital to the local economy and sustain long-term jobs, businesses, and community wellbeing.

At the 15 March 2026 Ruakākā Beach protest organised by the Bream Bay Guardians, the Mayor of Whangārei stated *"We are very concerned that the benefits of this proposal will not come into Northland, and, in fact, the outcomes will not be good for us at all."* He further noted that while Auckland would reap the financial benefits, Northland communities would be left bearing the ecological risks. Local protestor and Ruakākā accountant Nicole Butturini reinforced this view, stating that sand mining offers "absolutely no benefit" to Northlanders, while risking 'far more significant long-term economic opportunities through tourism and recreation.

The Fast-Track Process Is Inadequate for a Decision of This Scale and Duration

We have deep concerns about the process by which this application is being considered. The Fast-Track Approvals Act removes the normal rights of community members and hapū to be heard, to make submissions, and to seek judicial review through the Environment Court.

This is not a minor project but a 35-year industrial operation with permanent, irreversible impacts on one of Northland's most treasured coastal environments. The community, including local hapū Patuharakeke, whose rohe moana includes these waters, has overwhelmingly opposed it. More than 14,000 people signed a petition to Parliament, and residents have voiced strong and consistent opposition. Large-scale protests organised by the Bream Bay Guardians, including beach demonstrations at Ruakākā and a flotilla protest of over 50 vessels, show the depth of concern throughout the community. Both the Whangārei District Council (unanimously) and the Far North Mayor have also expressed clear opposition.

The Government's own Advisory Group ranked this project as low priority, the lowest possible ranking, among 384 submissions. It was nonetheless placed on the fast-track schedule. This sequence raises serious questions about whether the public interest in environmental protection is being properly weighed.

Local hapū have made clear they have not been meaningfully consulted. The CIA process is the only avenue remaining for tangata whenua to express their views, and the fast-track structure means they cannot take legal action through the Environment Court if the outcome is adverse to their interests. This is inconsistent with Te Tiriti o Waitangi obligations.

Conclusion and Request

For all the reasons set out above, we urge the Expert Panel to decline this application in full.

In summary:

- There is no genuine shortage of construction sand that cannot be addressed through less damaging alternatives, including manufactured sand from Northland's own quarries.
- Approving this proposal would directly undermine the sacrifices made by fishing communities under the Northland scallop no-take closure, which was implemented to protect the very seabed now proposed for industrial dredging.
- The global and domestic record of coastal sand mining demonstrates that beach erosion, ecological destruction, and community harm are the predictable outcomes of operations like this one.
- The physical science of Bream Bay's enclosed hydrodynamic system raises serious and unresolved risks of accelerated erosion at Uretiti, Ruakākā, Waipu, and Langs Beach.

- The ecological consequences, including for scallop recovery, the tara iti, hawksbill turtles, inshore fisheries, and marine mammals are severe, long-lasting, and in many cases irreversible.
- There is no meaningful economic benefit to Northland from this proposal. The profit goes south; the harm stays north.
- The fast-track process is ill-suited to a 35-year industrial consent of this environmental significance and has denied the community and tangata whenua their proper voice.

We urge the Panel to protect Bream Bay. Reject this proposal and do not allow one company's interests to irreversibly alter its beaches, fisheries, and ecosystems. Safeguard this bay for future generations of Northlanders and for club members who have loved and respected these waters for over 60 years.

Steve Worthington | Club Spokesperson

Stephen Glibbery | Commodore

Waipu Boat & Fishing Club, Inc.

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