20 October 2026

Expert Panel
Alternative to the Brynderwyn Hills Project
Environmental Protection Authority

Email: substantive@fasttrack.govt.nz

Re: Te Parawhau Hapū - Further Comments on the Alternative to the Brynderwyn Hills Project (Section 2B - Te Mano Hiwa Ariki to Waipū)

Tēnā koutou,

Te Pouwhenua o Tiakiriri Kūkupa Trust, on behalf of Te Parawhau Hapū, provides the attached reviews of the proposed Designation Conditions, Resource Consent Conditions and Wildlife Approval Conditions for the Expert Panel's consideration in response to the opportunity provided by the Panel to submit further comments following the resumption of processing of the Alternative to the Brynderwyn Hills Project (Section 2B - Te Mano Hiwa Ariki to Waipū).

The attached reviews should be read alongside and in conjunction with:

1. Te Parawhau Hapū Cultural Impact Assessment dated 2 July 2026;
2. Te Parawhau Hapū Comments to the Expert Panel submitted in August 2026;
3. the evidence of Matua Pari Walker, Chair of Te Pouwhenua o Tiakiriri Kūkupa Trust; and
4. the expert ecological reviews commissioned by Te Parawhau Hapū, including those prepared by Bay Ecological and Kukuwai Consulting.

Te Parawhau continues to rely upon and adopts those documents in full.

The position of Te Parawhau Hapū remains unchanged. Te Parawhau recognises the importance of providing a safe, resilient and reliable transport connection through the Brynderwyn Hills. However, Te Parawhau does not support the proposed design and construction methodology, which relies upon extensive cut and fill earthworks, substantial modification of landforms, freshwater systems (awa, manga and puna wai) and wetlands (repo), the loss and fragmentation of indigenous habitats, impacts on taonga species, and permanent alteration of Te Mano Hiwa Ariki and the wider ancestral taiao. Te Parawhau remains of the view that alternative approaches, including tunnelling, bridging and viaduct structures, may have avoided or substantially reduced many of these adverse effects. Consequently, Te Parawhau remains concerned that the scale, significance and permanence of adverse effects have been underestimated and are not adequately understood throughout the application documentation and supporting technical assessments.

Te Parawhau further remains concerned that the proposed Designation Conditions, Resource Consent Conditions and Wildlife Approval Conditions do not adequately address or resolve the concerns identified through the Cultural Impact Assessment, expert reviews, evidence and previous submissions. Significant reliance continues to be placed upon future management plans, technical certifications, adaptive management responses, restoration programmes and future decision-making processes founded upon assessment methodologies and assumptions that remain contested by Te Parawhau and its experts.

Consistent with the concerns raised within Te Parawhau Hapū's Cultural Impact Assessment and submissions on the Application, the proposed Designation Conditions, Resource Consent Conditions and Wildlife Approval Conditions were reviewed and substantially amended on behalf of Te Parawhau Hapū by its resource management and ecological advisory team. The attached comments and recommended amendments have subsequently been reviewed and approved by Matua Pari Walker, Chair, and Whaea Mira Norris on behalf of Te Parawhau Hapū and are provided for the Expert Panel's consideration.

The attached reviews have been prepared in response to the proposed conditions currently before the Expert Panel. They identify amendments that Te Parawhau considers necessary to better recognise and provide for ngā uara ahurea o Te Parawhau (Te Parawhau Cultural Values), protect the mauri of affected taiao, and address deficiencies identified through the Cultural Impact Assessment, expert reviews and previous submissions. Te Parawhau

remains concerned that the proposed conditions do not provide sufficient certainty that the mauri and health of affected environments will be appropriately protected. The preparation of these reviews should not be interpreted as support for the Application as currently proposed.

If the Expert Panel is minded to approve the Application, Te Parawhau respectfully requests that significant weight be given to the attached reviews and recommended amendments. Te Parawhau considers these amendments necessary to provide greater protection for Te Mano Hiwa Ariki, ngā wai, repo, indigenous biodiversity, taonga species and the wider taiao, and to better recognise and provide for the role of Te Parawhau as kaitiaki.

For ease of reference, the following documents are attached:

1. Cover Letter - Te Parawhau Further Comments Section 2B 20 October 2026;
2. Te Parawhau Review of Designation Conditions (July 2026);
3. Te Parawhau Review of Resource Consent Conditions (July 2026);
4. Te Parawhau Review of Wildlife Approval Conditions (July 2026); and
5. Te Parawhau Hapū Comments S53-54 FTAA Brynderwyn Hills (August 2026).

Thank you for the opportunity to provide these further comments.

Mauri ora



Pari Walker
Chair Te Pouwhenua o Tiakiriri Kūkupa Trust
on behalf of Te Parawhau Hapū