Before Independent Commissioners appointed by the Auckland Council

CST

60343373

Under	the Resource Management Act 1991
In the matter of	An application for a coastal permit for sand extraction as a Restricted Discretionary
Activity	from the Auckland Offshore Sand Extraction
Area,	off shore from the Mangawhai-Pakiri
embayment	
By	**Kaipara Limited**
	Applicant

STATEMENT OF EVIDENCE BY OLIVIA HADDON

FOR TE WHANAU O PAKIRI (A SUBMITTER)

18TH FEBRUARY 2021

Ko Moekakara te Waka

Ko Hauturu o Toi to Motu Tapu Ngā Pōito ō Te kupenga ō Toi Te Huatahi

Ko Toi Te Huatahi te Moana

Ko Pakiri Te Awa

Ko Tamahunga te Maunga

Ko Ngāti Wai te Iwi

Ko Ngāti Manuhiri te Hapū

Ko Ōmaha te Marae

Ko Te Kiri te Whare Tupuna

Ko Te Kiri te Tangata

Ko Oneonehaea te Taonga

Ko Pakiri te kainga tuturu

Ko Laly Te Kiri Paraone Haddon tōku papa

Ko Olivia Rangimaria Haddon ahau

Statement by Olivia Haddon for Te Whanau O Pakiri.

This statement is supplementary to our in depth and detailed submission of objection.

Summary of Issues

1. Te Whanau O Pakiri has occupied our whenua and moana within the Pakiri area for 600 years or more and has rangatiratanga and kaitiakitanga responsibilities for where the current and mining occurs and proposed future sand extraction proposed to take place.
2. The continuation of sand mining off Pakiri Beach does not maintain the life supporting capacity of the marine environment and fails to protect the characteristics of this special coastal marine area and all that we the tangata whenua value.

3. The proposed activity will also not maintain our indigenous biodiversity in the coastal marine area and wider Hauraki Gulf Marine Park.
4. This application, therefore, does not consider the kaitiakitanga values of tangata whenua, whanau and hapu and the community most directly impacted by the activity. It is a direct breach of the duty of active protection of taonga including the restoration of Mauri so the proposed activity impacts adversely on our marine environment, cultural values, customary activities and way of life. Our whanau has a long legacy of involvement standing against sea floor mining and sand extraction in Pakiri. There has been little consultation and even this has lapsed.
5. The granting of this permit will fail to have particular regard to kaitiaki of the Pakiri area
6. The granting of this permit fails to recognize and provide for, the matters of national importance relevant to Maori and their relationship to culture, and traditions over ancestral land, water, sites, waahi tapu and other taonga.
7. The continuation of such an activity without our express consent contravenes the principles of the Treaty of Waitangi and fails to take into account our Rangatiratanga.
8. Also, the extraction of sand from this area is not sustainable management of natural and physical resources of the whenua and moana.
9. Expert opinion states that in the long term sandmining will change the nature of the beach and may also be having an impact on threatened and at risk bird species that depend on the area for food.

Introduction

10. Thank you for coming to the Pakiri Hall to the heart of the matter so you can meet the community, hapu of Pakiri and whanau most impacted by this activity. This generous act is a significant gesture and recognition of the mana of our whanau here at Pakiri, we would like to acknowledge that.

11. Thank you also to our whanaunga Ngāti Manuhiri for supporting our kaumatua and kuia in their request and Te Whanau O Pakiri in our wishes for the hearing to come here to the Pakiri Hall. This demonstrates the recognition of the Whanau of Pakiri as the rightful kaitiaki in place as per tikanga.

12. My name is Olivia Haddon and I represent Te Whanau O Pakiri we are the tangata whenua of Pakiri. I am an Urban Designer and Design Planner with qualifications from the University of Auckland I hold Masters in both Urban Design and Urban Planning. I work as a Specialist in Māori Design and am involved across multiple projects to integrate mātauranga and tikanga in design and development.

13. I have worked as a Planning coordinator on the Tai Timu Tai Pari Sea Change Marine Spatial Plan with Auckland Council and both the Auckland and Waitemata District Health Boards to integrate Mana Whenua and Maori cultural values into urban design outcomes and urban planning and development. I regularly present to local and international audiences on the topic of "Finding Māoritanga in culturally erased and colonized spaces". I am the author and curator of Te Paparahi Toi a Māori art and cultural landscape values publication. I have contributed to and co-authored with the ARUP Foresight and Innovation team a publication titled "Tamaki Makarau 2050," providing a Māori values framework and guiding principles to acheive a vision of wellbeing for all. I am a member of Nga Aho and Woman in Urbanism.

14. I am from Pakiri I was born and raised here, and I am tangata whenua. I have a whakapapa responsibility to stand here today as kaitiaki with a direct ancestral relationship to the taonga of this precious area. I stand here today before and amongst my people, including those who are no longer with us.

15. I belong to Pakiri and Pakiri belongs to me (my whanau inclusive) through my father laly Haddon, his mother Kerehi Paraone- Haddon, she was the daughter of Kiri Brown of Pakiri and Tihoi Amos from Ngunguru (Ngati Wai), Kiri Brown was the son of Rahui Te Kiri of Pakiri and Tenetahi Pohuehue of Mōtairehe (Ngati Wai ki Aotea) They lived in Pakiri, Omaha and Hauturu (Little Barrier). Rahui Te Kiri was the daughter of Te Kiri Kaiparaoa our eponymous Rangatira the remaining chief of Ngāti Manuhiri and Pepei (Te Tāou). Rahui inherited her father's principle rights to Pakiri, Hauturu and Omaha. Te Kiri descends from Te Wera his mother who was the daughter of Kupapa (Ngati Manuhiri) and Turua (father) (Ngati Wai), Kupapa is the child of Te Awa whose mother was Tūrangi the daughter of Manuhiri who was the son of Maki.

16. My people have lived constantly on this land. We credit our ancestress Rahuikiri for her legacy stand in holding on to our lands here at Pakiri and her commitment to her Ngati Wai heritage through her grandmother Te Wera and great grandfather Turua and through her marriage with

Tenetahi whose father was Pouehue son of Te Heru. There were many marriages between Ngati Manuhiri and Ngati Wai. Today all Ngati Manuhiri can claim to be Ngati Wai but not all Ngati Wai can claim to be Ngati Manuhiri. For many decades our interests have been represented by Ngati Wai Trust Board reinforcing our identification with Ngati Wai. More recently our treaty settlement crown asset interests have been managed through the Ngati Manuhiri Settlement Trust. Therefore, Ngati Manuhiri tribal whakapapa are underpinned by both our tupuna who descend from Kāwhia through Maki in the south and Manaia in the north.

17. Te Whanau O Pakiri is our incorporated society formalised by our elders in the 1980s dedicated to the social and cultural development of the whanau of Pakiri. In which I am currently the chairperson. We are made up of whanau and longtime residents of Pakiri. We are the haukainga and ahi kaa of the valley and traditional kaitiaki of Pakiri Beach. We uphold the wellbeing of our relationship together and to our place and we care for our community.

18. I am providing our cultural perspective as evidence on behalf of our Pakiri Te Whanau. And intend to provide an understanding of the nature of our relationship to the taonga. I have been supported and requested by our whānau to present this evidence on our collective behalf, and my evidence today includes my own and whānau knowledge of the site and surrounding area, and also information which has been provided to me by our kaumatua and kuia directly concerning our relationship to Pakiri and our coastal marine and land scape our Mana Moana and our Mana Whenua.

19. My evidence today is supported by and in turn supports the evidence and kōrero to be provided by our Kaumatua Gavin Brown and Kuia Coral Clinton, Mr. Pita Rikys LLB Business & Public Sector Consultant – Resource Management / Treaty and Local Government specialist, Mr. Craig Radford Associate Professor Institute of Marine Science University of Auckland, Mrs Sian Johns MSc -Geomorphologist, specialist shoreline management and climate change. Mr. Tamati Stevens MAIK Master of Applied Indigenous Knowledge and Master Diver and Mr. Ian Southey MSc (Hons) in Zoology Fairy Tern Specialist. We also strongly support the technical and other evidence as provided by our tauiwi friend and neighbours Damon Clapshaw, Jessie Stanley and Andrew Jeffs from the Auckland Conservancy submission and the “Friends of Pakiri”.

Structure of Evidence

20. The structure of my evidence follows my indigenous understanding of the land and sea scape that this proposal sits within as tangata whenua and kaitiaki. It covers the background to our longstanding objection to this activity in our Moana. Over the course of this hearing, you will hear and may have already heard from individual whanau and community members, and our other social and cultural and whenua organisations, Te Kiri Marae, Pakiri G Trust, our Iwi Authorities, Ngati Manuhiri Settlement Trust and Kaitiaki Trust, Ngati Wai Trust Board and individuals of our community. Although our organisations have different Kaupapa responsibilities we are all one and are united in principle against this activity in our Moana.

The Current Proposal

21. I confirm that I have read all documentation relating to the current proposal provided by the applicant and that I understand the nature and extent of the proposal. I note that the Cultural Impact Assessment accompanying this proposal provided by Te Uri O Hau overlaps a small portion of the rohe of Ngati Manuhiri and Ngati Wai and does not provide any meaningful discussion with Ngati Manuhiri Settlement Trust, Te Whanau o Pakiri or Te Kiri Marae and we do not see this report as valid for our purposes as it is not representative of our kaitiaki relationship as ahi kaa of Pakiri as the whanau and hapu most impacted by this activity. This is not to say that they do not have a relationship to the area outlined in their report but it is limited to that and not the whole application area.

22. At the heart of this application, the applicant is looking to expand their activities and continue to mine the seafloor and dredge for significant quantities of our sand adjacent to our kainga tuturu Ngā Oneonehaea o Pakiri. Utilising a suction dredge that will form multiple trenches on the seafloor across the length of our bay approximately 26km in length over a period of 20 more years. Removing 2 plus million cubic metres of “Holocene relic” sands- taonga tuku iho, taking with it “benthic species and biota” – our kaimoana and children of Tangaroa . We understand that the process involves blasting powerful water jets at the seabed, and sucking up everything that is released. Thus, making water cloudier, releasing and mobilizing sediments or paru, reducing precious light levels for Stoney corals and aquatic plants and damaging and destroying the spawning and feeding grounds for other species.

Ongoing and enduring relationship to Pakiri Beach and our Moana

23. Our people have occupied the Pakiri coastline in unbroken succession for well over 600 years and thus have a special relationship with it that is unlike that of any other group. As tangata whenua we hold our individual and collective lands and kaitiaki responsibilities to our moana, whenua and hapori/community here in Pakiri as explained in my introduction.

24. As whanau we are descendants of our paramount Rangatira Te Kiri and his daughter Rahui Te Kiri and her husband Tenetahi we recognize both Ngati Manuhiri as our post settlement governance entity for our wider mana whenua hapu associations within our larger tribal rohe through our Kawerau descent and also our ancestral affiliations as hapu of Ngati Wai. Our Marae and Urupa is at Omaha and Pakiri. Omaha is where our whare Te Kiri stands. Pakiri is our kainga.

25. The moana adjacent to our kainga and the resources in the sea and below it are treasured possessions, our Taonga, that are part of our inheritance. We are dependent on them and we are the kaitiaki of them. The use, development and protection of sustainable management of these taonga is part of our heritage and our tino/rangatiratanga.

> *"Our traditional tribal domain of which we hold traditional ownership rights and mana whenua, mana moana and exercise tino rangatiratanga and kaitiakitanga includes the whole coastline of Pakiri…. and extends over the ocean of Pakiri and beyond to the offshore islands All three elements, the land, the sea and offshore islands are collectively on tribal domain and cannot be separated."(LP Haddon, Tangata Whenua Pakiri, 1993)*

Background of Whanau Involvement

and Longstanding Objection to mining and dredging the Sea Floor

26. The continuation of this activity through the Unitary Plan is at odds with mana whenua values and the partnership principle (ideally with us as kaitiaki alongside our iwi authorities Ngati Manuhiri Settlement Trust and Ngati Wai) Despite the decades of our position being very clear with the multiple council authorities of the past Rodney, Auckland Regional Council, Auckland City and now Auckland.

27. We are here today as the continuous thread. Before me stood my late father Laly Haddon. Who sadly is no longer with us. Our Kaumatua Gavin Brown and my father Laly were both

principal opponents to Kaipara and other commercial extractors when they sought sand permits in the early 1990s (Sea Tow Limited v ARC A129/93) Prior to that my father had opposed an application by the Auckland City Council to take sand for beach replenishment purposes (Haddon v ARC A77/93). His stance on the extraction of sand from Pakiri area is well known to Kaipara and the then regulatory authorities.

28. Both Gavin and my father represented the Tangata Whenua of Pakiri, Te Kiri marae and the iwi of Ngāti Wai not just as an interested group but as tangata whenua of the Pakiri area and most importantly as a treaty partner with the Crown.

29. Through the process of their objections, the past authority ARC acknowledged that "it will take account of Mr. Haddon's interest in any future application". In the Planning Tribunal report to the Minister of Conservation decision #A77/93 (p17) it is stated that:

> *"Mr. Haddon and his family are the tangata whenua of the area in which the sands are located, which in turn is part of the tribal rohe of the tribe. Tangata whenua have the mana of the area and its customary authority" it was ruled that "consideration must be given to how the relationship of the hapu of Pakiri through the representative Mr. Haddon and his family with their ancestral lands and waters may be provided for. We hold that the hapu should be able to exercise kaitiakitanga over the resource and give guidance on how it should be developed and to what extent"*

30. What my father and my kaumatua uncle Gavin both recognized through their extensive involvement in standing up against sea floor mining and sand dredging in our moana was that the Crown provided for the taking of the sand through the Resource Management Act and the then Auckland Regional Council also through the Coastal Plan, and this is still the case today with the Auckland Unitary Plan. Although they tried whole heartedly to stop the mining, they were unsuccessful in that approach.

31. Decades of attending hearings and providing and fighting for an awareness at least of a partnership and advocating for our rights enshrined in the treaty, has subjected my whanau to significant threats of hardship. Our statements and cultural evidence are dismissed as "personal opinion". We are small and the legal process is a Goliath. The submission process has been challenging when there is no respect for our traditional knowledge and cultural

perspective and we are unable to be effective when The legislation is enabling unsustainable exploitation and, in our opinion, still pernicious to our Indigenous rights. Our kaumatua are tired they have dedicated a good chunk of their productive lifetime to this issue, thus creating a sense of apathy in our ability to halt the incoming tide of encroachment to our value systems, relationships to our taonga and way of life. This is not right.

32. In his evidence statement my father said *" As tangata Whenua and as a representative of iwi, I can quite honestly say that the iwi of Ngāti Wai wish that no sand be taken at all from Pakiri beaches and that in a perfect world, existing operations would be stopped and our true role as kaitiaki of our resource would be restored".(1998)*

33. We were unsuccessful in stopping the mining but my father and Gavin were able to achieve a strategy of consultation, which ensured full information was provided to us.

34. They established the relationship between Kaipara the Ngāti Wai Trust Board Resource Management Unit (Environmental arm). A relationship of partnership based on trust, mutual recognition and understanding, where future projects were to be discussed openly. Ngāti Wai wished to be involved directly in the operation to recognize and provide for their relationship with the taonga as a practical expression of kaitiakitanga. Iwi welcomed the opportunity to become involved in the sand extraction project so that they may gradually influence the withdrawal of the sand extraction industry from the beach.

35. Kaipara recognized there were important cultural issues and matters that needed to be addressed. We commend them for this past approach. In this progressive manner they recognised the mana of the people and place and the tāonga. They engaged early and meaningfully before their application was lodged. In turn providing understanding of their efforts for a sustainable attempt. This partnership and principled approach provided them with certainty and reduced the risk of a lengthy and costly consent and appeal process.

36. That relationship was formally adopted with an MOU to sit alongside the conditions of consent, forming an iwi liaison and monitoring group with Ngāti Wai representatives for the purpose of consulting on matters of kaitiakitanga meeting the then requirements of Part II of the act and its interpretation by the environment court (Haddon v ARC).

37. My father made the following recommendations to Kaipara which are still pertinent today. These are outlined below:
    - That the Principles of the Treaty of Waitangi be taken into account in all dealings between the parties
    - That Ngāti Wai be recognized as the body that represents all Ngāti Wai iwi as well as tangata Whenua on this application and that the responsibilities of kaitiaki be undertaken by Ngāti Wai Resource management Unit so that consultation takes place when and as required.
    - Recognition of Ngāti Wai mana whenua- mana Moana should be made by way of memorandum of understanding and that documentation be drawn up between the parties to establish a future partnership
    - That the increase of sand to be taken from deep water and that there should be an effort by the company over time to reduce the current inshore extraction
    - That the principle Rangatira of Kaipara should meet with kaumatua of Te Kiri marae once a year as extraction of sand takes place. Not to report but to regularly discuss issues.
    - That information be made available to Ngāti Wai and the general public on the monitoring of the seabed arising out of the project.

38. The willingness by both Kaipara and Iwi to reach a mutually beneficial result set a strong procedural precedent in achieving the requirements of part II of the act for both the applicant, iwi and authorities and planning Institutions. My father wrote in his report to the commissioners:
    a. *"I am proud to have been involved in a project where there has been such willingness by a commercial entity to take on board iwi concerns and to act as a 'bridge' between them and iwi as a whole. In my view that is what consultation and cultural recognition is all about. We have come a long way since I stood before this committee last and the road ahead is now irrevocable changed for the better*." (1998)

39. Despite the official recognition of our whanau kaitiakitanga by the Planning Tribunal and the progressive relationship precedent, the Council and applicant have not ensured that the past hard work in establishing that relationship has continued. We wonder why the MOU does not stand and has not been followed up by Kaipara and our Iwi authorities. Unfortunately, as all

relationships do over time without genuine commitment, it has fallen over. Kaipara has since handed the operations of their license to McCallum Brothers who continue to mine the inshore deposits undermining the fundamental expectation by iwi that there was to be an effort by the company over time to reduce the current inshore extraction.

40. Based on the last two rounds of consent hearings over the decades and the long term nature of the activity we are disappointed at the:

- The lack of regard to our matauranga and knowledge “Korero Tuku Iho”
- There is no recognition of the real and potential impacts of mining the seafloor in relationship to the decline in Mauri and the actual long-term disturbance to seafloor biodiversity.
- The total lack and negligence of our treaty rights in the Council s42 report and recognition of our longstanding and ongoing kaitiakitanga

41. One of the main drivers of this document for us was to navigate a gradual reduction and eventual cessation of the mining activities. This is an outcome anticipated by others as well such as the late Dr Roger Grace and the five scientists involved in the 1999 NIWA sand mining study who anticipated that this might occur by 2003. And here we are again twenty years later, and the applicant not only wants to keep mining the sands but to accelerate that activity. There may have been a little goodwill when the agreement was set up but, in reality, all that was achieved in the past was a little consultation and some small adjustments and even this has been lost. It is time to do better for us and phase this uninvited activity out of our tribal domain and the public marine park.

Indigenous landscape values and the right to preserve them

42. As outlined in the Unitary Plan section B.6 Mana Whenua. Development and expansion of Auckland has negatively affected Mana Whenua taonga and the customary rights and practices of Mana Whenua within their ancestral rohe. Mana Whenua participation in resource management decision-making and the integration of mātauranga Māori and tikanga into resource management are of paramount importance to ensure a sustainable future for Mana Whenua and for Auckland as a whole.

43. In making and implementing the Plan, the Council must, as a matter of national importance, recognise and provide for the relationship of Mana Whenua and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga. The Council must also:
    - have particular regard to kaitiakitanga;
    - take into account the principles of Treaty of Waitangi/Te Tiriti o Waitangi; and
    - recognise the historic, traditional, cultural, and spiritual relationship of Mana Whenua with the Hauraki Gulf/Te Moana Nui o Toi/Tīkapa Moana.

44. We strongly argue that enabling this activity through the Unitary Plan has not recognized our interests, our values and our customary rights have not been considered. The continuation of this activity is anything but sustainable management of natural and physical resources. The integration of our mātauranga and tikanga in this specific resource management processes is not evident to us.

45. Therefore, our relationship to our taiao/natural environment, including our customary uses is not enhanced.

46. Significant adverse effects on ancestral tāonga occur largely as a result of uninformed actions before making decisions which may affect customary rights, an understanding of the nature of the tāonga to Mana Whenua is required. This understanding can only be gained from those who have an ancestral relationship with the taonga.

47. The absence of an appropriate study to establish indigenous landscape values and our ancestral relationship has meant that this process has been uninformed of our values. If the indigenous landscape does not receive the same degree of study and research attention as the other competing landscape types its values will not be identified (Low Choy, Wadsworth, Burns 2019). In the case for Pakiri and the Hauraki Gulf and the ongoing assault to our identity by planning mechanisms such as evident in this planning process our indigenous values here have not been recognized prioritised and accounted for that such an activity may be permitted.

48. An indigenous cultural landscape (ICL) is a concept that depicts combined natural and cultural landscape features that together support an indigenous community in its entirety

(Beacham, Copping, Reynolds, Black 2017) The concept helps to translate intuitive environmental knowledge into defined criteria for evidence based data to be gathered. Indigenous knowledge and intuition about landscape builds on observations gathered over multiple generations, "although unwritten is scientific in its evidence based nature" (Beacham, Copping, Reynolds, Black 2017) ICL's utilise contemporary language and scientific methodologies with mātauranga (multi-generational knowledge) handed down as korero tuku iho. Academic language has forgotten this methodology however much is being done to restore and recognize Traditional Ecological Knowledge (TEK).

49. Traditional ecological knowledge is a cumulative body of multigeneration knowledge, practices and beliefs handed down through generations by traditional waiata, purakau, tauparapara, whaikorero, karakia and whakatauki- songs, origin stories, chants, incantations, oratory arts, prayer and proverbs -all korero tuku iho. These were developed in everyday life that was in direct contact with nature. Matauranga is engineered to sustain rather than exploit resources. Fostering symbiosis between species and to intelligently harness the energy of ecosystems and adapt to environmental obstacles. (Davis, Watson 2020)

50. For indigenous people's traditional ecological knowledge conveyed through korero tuku iho forms the foundation of a complex understanding of the natural world. This has been summarized into a model by ecologist Fikret Berkes known as the Knowledge Practice Belief Complex designed to work with western scientific framework. Berkes explores the importance of local and indigenous knowledge as a complement to scientific ecology, and its cultural and political significance for indigenous groups themselves.

51. There are four interrelated levels of ecosystem management, these aspects are complex and important in maintaining balance and order in the relationships between humans and nature. The first and foundational level is local knowledge of animals, plants, soils and landscapes. The second is local environmental knowledge of resource management, practices, tools and techniques involving local understandings of ecological processes. The third level involves understanding our community, social organization for co-ordination, co-operation and governance. The fourth level is our world view captured in the description "Te Ao Maori" This involves what the RMA processes and decision makers have struggled to identify for some time, it's the intangibles – wairua, mauri, the spirit,

religion, ethics, values and general belief systems. Te Ao Maori (world view) provides guidance for interpretation of observations.

52. “Every culture is by definition a vital branch of our family tree, a repository of knowledge and experience, and if given the opportunity, a source of inspiration and promise for the future” (Davis 2020)

Pakiri Cultural Landscape

53. The Pakiri cultural landscape forms and important part of the wider whanaungatanga with Ngāti Wai and Ngāti Manuhiri collective tribal custodianship. The Pakiri coastline, our maunga (mounts) motu (islands), roto (lakes) and awa (rivers) have and still are recognized as part of the Ngāti Manuhiri coastal and river statutory acknowledgement cultural redress with the crown. Our tikanga and kawa has been handed down through traditional kōrero and practices from our tūpuna to us today. This cultural relationship and depository of knowledge is strongly interconnected around our mōana and natural resources both at sea and on land. Unique to Pakiri is our unbroken succession and occupation that we have retained cementing our identity to this special kainga, whenua and moana. We stand here on our whenua today. We have never left our whenua. We will never leave our whenua.

54. We are a coastal people. Our permanent occupation means we still farm, fish, hunt and cultivate our lands as we have always done. Our water ways, both waitai (salt) and waimāori (fresh) provide a valuable source of water, food and materials and support our ongoing occupation.

55. The tikanga and kawa of our people in Pakiri strongly hinges around the moana and natural resources both on the land and sea and our outlying islands. Hauturu, Aotea, Hawea, Taranga, Tūturu, Pokohinau. We have strong connections to our whanaunga on sea Ngati Wai and Ngati Rehua. We have retained our connections to our taonga.

56. Many changes in ownership and land use and have occurred around our tribal rohe and in Pakiri, yet despite these changes the places themselves do not lose their importance to Te Whanau o Pakiri and to our Mana Whenua collective whanaunga who regard them as fundamental to all our wellbeing, identity, past, present and future.

57. Our inhabitation of this cultural landscape is informed by hundreds of years and celebrated in our waiata, karakia, pepeha and pakiwaitara and mahi toi (artistic expression). Our moana, and beings within it, the awa, supporting wetlands, hills and forests and fisheries are redolent with meaning for us.

58. Te Awa of Pakiri are Te Wai Poutawa, Te Awa Pakiri are important landmarks and resources. They still provide us with sustenance. Our headland pā and our current settlements are focused around the Pakiri Awa. Pakiri is home to the largest remaining Ngati Manuhiri community. Our Pakiri te Whanau occupy the last piece of coastal land on the east coast remaining in Māori ownership within the Auckland region in which 0.2% of land remains in indigenous Māori title. A rare, unique and very special situation worthy of symbolic importance, respect and special care.

59. Ngā One Haea and alternatively Oneone Haea is the traditional name for Pakiri beach which translates as glistening white sand, indicates that our place has long be renown for this quality. One being the word for sand and emphasised in the repetition of Oneone meaning much and continued sand. Haea describes the glimmer of light as the sun draws closer to the horizon as it breaks the early morning darkness, illuminating the passage of waka to and from.

60. The long stretch of sandy coast connects and illuminates the way *ki uta, ki tai*, to many of our Pa sites along the length of the beach from Ōkakiri in the south, working our way north to Pākiri, Taumata, Taurere ō Rei, Whetūmakurukuru, Ōpuawhanga, Putukākā and finally Te Ārai Ō Tāhuhu in the north. Some of which still have many of us living on the slopes in our whanau papkainga settlements.

61. Of high importance in the recognition in terms of Indigenous Landscape values that these include views from traditional sea paths taken by our Waka looking into the coastline that include heritage values and Whakapapa links, dimensions (pa sites), landmarks such as our coastal dune forests, specific feature Pohutukawa trees and high dune peaks (that we believe are diminishing in height), cliffs north and south in the coastal headland of the bay once abundant with seabird breeding colonies – all but disappeared due to deforestation and the introduction of pest species. Our Maunga Tamahunga in the far distance and the hill ranges that connect, some in our ownership that are still covered in native forest and flow to intact wetlands into our Pakiri Awa. These features make up our cultural legibility.

They are in my view a critical part of a Whanau / Hapu / Iwi sense of place and identity. Thus, cumulative changes to the surrounding hinterlands, beach, dunes, form and colour of the sand as observed over a 50 year time frame and stated in the evidence presented in the submission made by my mother Sharley Haddon, is a huge intrusion into these values and a direct breach of the Crown's obligations and duties under Te Tiriti of active protection.

Our Cultural Keystone Species

62. The whai (sting ray), Tara iti (fairy tern), Tohora (Guardian Whales) are our kaitiaki species. As we are kaitiaki so too are our special species found along our coastline. Our kaitiaki species are of high spiritual and cultural value. Found in our folklore and play a crucial role in our ecosystem. They have significance in our languages, traditions, histories and spiritual practices. As coined in 1969 by zoologist Robert Paine Cultural keystone species locks an ecosystem in place and form the foundation of indigenous infrastructure.

63. The Whai once found regularly in our harbour and the coastal embayment of Pakiri give the name to Mangawhai (harbour of the whai) This name indicates the major historical, cultural and spiritual importance to our Iwi and to us as a Kaitiaki symbol. A bottom feeder the Whai like to eat animals that live on or beneath the sand like worms, clams, oysters, snails and shrimp as well as small fish and scallops. How is the dredging impacting this vital and important kaitiaki of our continued and traditional identity?

64. Tara iti is symbiotic with us. The bird follows the tribal domain footprint of our Ngati Manuhiri tupuna. Nesting in Pakiri, Te Arai and Mangawhai and wintering in the Kaipara harbour. We follow them and they follow us. Our whanau have supported the Department of Conservation to access and monitor the special nesting grounds and allow them access across our lands. As kaitiaki we watch the bird people watching our birds. This year we named a successful fledgling born at Pakiri- Waimarie. Waimarie is now settled in the Kaipara. And we await its return to nest again at our estuary when she is ready to come home to breed.

65. Tohora- many korero abound about our tupuna Manaia who communed with whales. Vast number migrated along our coast and still migrate past Pakiri annually. Manaia was

accompanied by an entourage of whales when he voyaged these were his mokai pets. These whales are our Kaitiaki – it is told, that Manaia turned these mokai into stones throughout his domain as kaitiaki for us his descendants. Hence the names in the greater Hauraki region Te Tohora a Manaia off Aotea, and Te Mau Tohora a Manaia (Motuora island at the Mahurangi harbour.) Ngati Manuhiri and the people of Pakiri still delight in the annual migrations of our kaitiaki-Tohora seen from our shores, they remind us of our ancestors, they tell us of the changing seasons, and are a tohu or indicator of the state of the environment, indicating the rich marine biodiversity need to sustain these great creatures of the ocean, that not only us alone are reliant on.

66. The large tanker ship that sucks our seafloor away and the creatures that support our kaitiaki species directly passes through important places for the Tohora. It is vital that they go with care as the channel and seaway between Whāngaparāoa , (name translates as the harbour/bay of Sperm whales) and Tokātu Point are a resting place the migrating whales and calves approximately between June-August). The seaway between Tawharanui and Hauturu was named by our seafaring ancestors, as Waimiha and Te Aumiha after where whale calves rested in this waterway.

67. Our eponymous Rangatiria Te Kiri takes on the name Te Kiri Kaiparaoa as a symbol of his strength and connection to these waters and these Tohora kaitiaki. *He reirei ngā niho parāoa, parāoa ngā kauae- if you wear a necklace of sperm whale teeth, you need the jaws of a sperm whale to carry them*. (Ngati Manuhiri)

68. Our ancestral relationship to our place is so significant especially the coastal marine area and the seaway Te Moana nui O Toi (Central and northern Hauraki Gulf). Our coastline the Takutaimoana falls into the realm of our god Tangaroa – Te Ao o Tangaroa. Traditionally providing us and many others with a vast source of kai moana, there was once a great abundance and variety of fish, shellfish, sea weeds and birds and Kekeno (seals). Our people still today have intimate knowledge of the tauranga ika (fishing grounds)- this knowledge is handed down to this day. Our traditions tell us of the fisheries made up of Hapuku, Terakihi, Tawatawa, Tāmure, Kahawai, Haku, Koura and Muri.

69. Kaimoana taken directly harvested the waters and sands adjoining Pakiri beach are Tuatua, Pipi, Paua, Kutai, Kanae, Makawhiti and Inanga, Tipa, Tio, Hururoa, kahawai, Tamuri and Pātki, Tākeke, Parore, Moki. Our collective memory recalls abundance, our

reality today is vastly different.There is a breakdown in the whakapapa and interrelationship between these species. We were reliant on this kaimoana resource, we harvested seasonally according to strict customary practices and tikanga. I refer here to the evidence provided by Tamati Stevens to elaborate.

70. The ocean area that Pakiri coastline is a part of, its mauri, kaitiaki, biodiversity, seaways, islands glistening golden sands and traditions lie at the heart of our identity and that of our hapu and iwi. The importance of the coastal area over the generations is reflected in our whakatauki and waiata. We have many traditions associated with the ocean, sailing and navigational and fishing skills still present amongst us today, we know the tides, we know the winds, we know the currents, we know the birds to follow, we know the weather patterns- our life depends on this knowledge.

71. Excerpt from Nga Taonga o Ngati Manuhhiri:

> *Ngati manuhiri trace descent from the famous and early Māori ancestor and voyager Toi Te Huatahi, after whom Te Moana Nui ō Toi (Central and Northern Hauraki Gulf) is named. This ocean area, seaways and islands and coastal margins are also associated with the earliest ancestral origins of Ngati Manuhiri, through descent from the ancestors Maui Pae, Manaia, and Tahuhunuiorangi. This seaway was also associated with the arrival of the Tainui and Aotea waka in the region, and the renown ancestors Rakataura and Turi from whom the founding ancestor Manuhiri descends.*

Safeguarding the coastal environment and all that we value and depend on

72. Fundamentally the burden has been placed on our whanau and community to prove the mining activity has been damaging.

73. We believe the continuation of this activity will damage the integrity, form, functioning and future resilience of our direct coastal environment at Pakiri. The continuation of seafloor mining and sand dredging extraction will have adverse effects on valued ecosystems. Information provided in the application is inadequate, not inclusive of our values and knowledge and inconclusive and we are concerned that the application will result in:

- the permanent loss of any food or habitat of our rare or endangered Fairy Tern and other shore and sea birds I refer here to the evidence supplied by Ian Southy.
- Disturbance of surrounding sediments and adverse effects on biota from contaminant release.
- Significant damage and destruction on marine flora and fauna such as the Hururoa and all other marine biodiversity they support.
- Loss of our traditional source of Kaimoana as outlined by Tāmati Stevens in his evidence statement.
- Exacerbated erosion and no provision or future proofing weakening our defenses to climate change impacts as supported by evidence provided by Sian Johns

74. We consider that there is continued lack of independent and quality review of monitoring of the real cumulative effects and impacts of sand mining at Pakiri in terms of the whole ecosystem. There is also no understanding of the cumulative effects of the multiple and combined activities over the last century since mining started in the 1900's (Hilton from the back of a Scow) and what these impacts are having on the overall mauri both directly at Pakiri and within the broader Hauraki Gulf.

75. What concerns us is that the authorities have known since 1986 when experts MJ Hilton and RF Mclean reported in the Pakiri Coastal Sediment Study that "**there would be no justification in allowing the mining operation to expand".** Then again in the NIWA Mangawhai-Pakiri Study 1998 confirmed again that "the sand system is essentially closed with no significant inputs to the sand budget. Sand extraction will result in continual adjustment of the beach profile to its equilibrium shape. At longer time scales this will be accompanied by a gradual retreat of the embayment shoreline. **Therefore, sand extraction is to be phased out."**

76. Professor Hilton in a past submission also determined that the sustainability of the mining operations still had not been established. In a published research article in the Journal of coastal Research, vol 12, No 2, he quotes that mining operations in the Pakiri-Mangawhai coast "appear inconsistent with the provisions of the Resource Management Act, specifically the imperative to avoid adverse impacts" (1996)

77. 100 years of continued disturbance from sand mining has already had multiple social and cultural impacts such as the loss of mauri, depleted kaimoana, the breakdown in traditional kaitiakitanga and whanaugatanga with mitigative acts of handing over money instead of protection in a sense buying us out. The coastal and marine ecology has been altered. The natural character has been impacted through the accumulation of these combined stresses.

78. The intention of this application is to ramp up production .
    i. The application exceeds the maximum extraction allowable –of 150,000m3 by 15%. Over 20 years this is an extra 3 million m3 of material being removed
    ii. Substantially increasing the intensity of the impacts and stresses.

79. The true cost and value of our taonga is not accurately reflected in the market price as outlined in Mr. Riddell's statement. We are astounded that it is cheaper than its manufactured alternative? We know that sand is important in cement industry and that this single industry could be the cause of up to 8% of the world's CO2 emissions. Not one of Mr. Riddell's consultants knows exactly how much damage is being done to the environment because their sand extraction is a largely hidden under water away from sight, the fact that it is happening in our isolated place, Pakiri, attracts far less attention to the matter. Aurora Torres, a Spanish ecologist who studies the effects of global sand extraction at Germany's Centre for Integrative Biodiversity Research states in interviews printed by the Guardian and Forbes Magazine that

" Sand extraction has grown strongly over the past four decades and has accelerated since 2000. Urban development is putting more and more strain on limited accessible deposits. Sand dredging degrades corals, seaweeds and seagrass meadows and is a driver of biodiversity loss, threatening species already on the verge of extinction. Our consumption of sand is outstripping our understanding of its environmental and social effects."

80. As outlined by our expert Sian Johns, the demands of the construction industry are not the only problem, backed up by Andrew Cooper, professor of coastal studies at the University of Ulster and co-author of The Last Beach *"the natural coastline is threatened by other forms of human interference. Most natural sand beaches are disappearing, partly due to rising sea levels and increased storm action, but also to massive erosion caused by development of the shore,"* The building of sea defences and so-called "beach replenishment programs" (dumping fresh

sand on Auckland City beaches to combat erosion) store up trouble for the future, he says, disrupting the natural movement of waves and sand along the shore.

81. Urban Auckland does not exist in isolation from the surrounding natural world. The processes we use to build, and live in this city, have profound implications beyond the urban boundary. Stricter restrictions on sand mining need to be more effective and combined with effort from planning authorities to encourage innovation and drive change other than business as usual. With more transparency construction companies would be better placed to make informed decisions about the resources they use and the treasured environments they are physically mined from. Arguably, the need to do so is greater now than ever before.

82. With the rise of environmental ratings, companies are increasingly motivated to incorporate sustainability into their decisions and financial investors are now required to have social and environmental statements. Environmental, social, and governance (ESG) criteria are a set of standards for a company's operations, investors now must use to screen potential investments. Environmental criteria consider how a company performs as a steward of nature. In October 2016 the NZ Super Fund launched "Guardians" a multifaceted climate change strategy designed to establish resilience to climate change investment risk over the long term. The United Nations provides two sets of guidance to support this here *Principles for Responsible Investment* and *Sand and Sustainability: Finding new Solutions for Environmental Governance of Global Sand Resources (2019).*See Appendix.

83. The UN environmental protection agency guidelines can be summarized to prevent and reduce damage to beach and marine ecosystems by:

    - Better land use Planning. Avoid consumption through reducing over-building and over-design
    - Encourage and subsidise the use of alternatives. Use recycled and alternative materials to sand in the construction sector so extraction is reduced to responsible levels.
    - Implement best practice guidelines

84. The evidence of the expert witness supporting our case raises these points.

- The sand being mined is a relic and finite resource and could be removed entirely by the mining operation
- The application has not considered future proofing or climate change
- Sand depletion prevents replenishment of the sand dunes. A lower beach profile will probably place the nests of fairy terns and other coastal bird species in danger of flooding. There has been an unusual number of unexplained deaths of breeding adult fairy terns adjacent to the sand mining area that may be related to mining activity.
- The Caspian tern colony at Mangawhai has halved in size since the mid-1980s and this, also, could be related to the sand mining operation.
- The local scallop beds have diminished, cockles are no longer present, Tākake (piper fish) numbers are significantly down.
- Noise stresses on marine life adds to the impact on marine biota not just mammals

85. We know from our long and continued association and reliance on our marine areas that these Horse mussel beds were never sparse and sparingly distributed. Large shells in the 1980s were intact and found littered in the hightide soft sand area along the length of the beach. One major storm event washed up significant numbers of them. local artists made lightshades from them. Today we find only broken shards of them.

86. Research on Hururoa/Horse Mussels shows that their beds are an important habitat, and their loss concerns us greatly.

87. The loss of horse mussels from Pakiri has been documented in reports related to sand mining. A side-scan survey in 2003 (Healy and Immenga not dated) found only isolated clumps rather than the predominant coverage in the 15-20m depth range that was present in 1996. Monitoring by Bioresearches (2019) also recorded these aggregations of Horse Mussels in 2003 but have not in subsequent surveys although some juveniles were found in 2017.

88. This reflects a national trend. A national assessment of Horse Mussel beds (Anderson et al 2019) states with moderate to good confidence that they have halved in area by 25-75%, their

habitat condition is poor, their ability to provide ecosystem services is poor and they are likely to decline in the future.

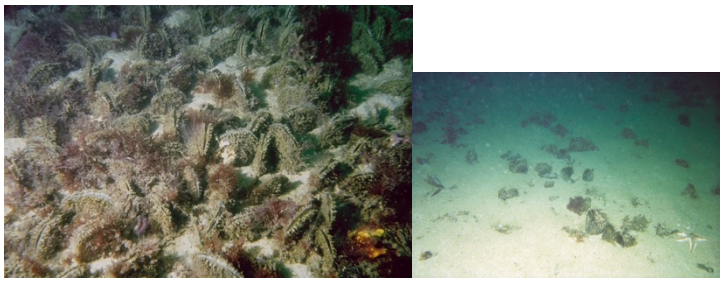
89. **Horse Mussels/ Hururoa** play a big role in seafloor ecology and seafloor biology. They are regarded as a sentinel species and vital to the health and ecological function of the Hauraki Gulf.
    - They stabilize a soft sandy environment (Anderson et al 2019),
    - provide a hard substrate habitat for other organisms to attach to (Morrison et al 2014)
    - provide protection from current flow (Green 2008, Anderson et al 2019, figure 1),
    - support the health and wellbeing of Scallop beds by reducing predation (Green 2008).
    - provide a nursery for juvenile snapper, trevally and perhaps other fish species and other species (Morrison et al 2014).
    - Adult snapper are more often found there (Morrison et al 2014)
    - They also play an important role in water filtration removing up to 80% of small, suspended particles (Anderson et al 2019, Green 2008).
    - It is what they do in mass numbers and in their spatial arrangement that matters.
    - Horse mussels sensitive to high levels of suspended sediment and have declined when it passed a critical threshold (Morrison et al 2014), and they protrude above the surface and are easily smashed by dredges such as those used to harvest scallops (Green 2008). When knocked sideways by dredges they seem to survive for up to a year or more (Morrison 2014). but do not seem to have the ability to re-bury. Sensitivity to suspended sediment and physical displacement would make them vulnerable to sand mining.

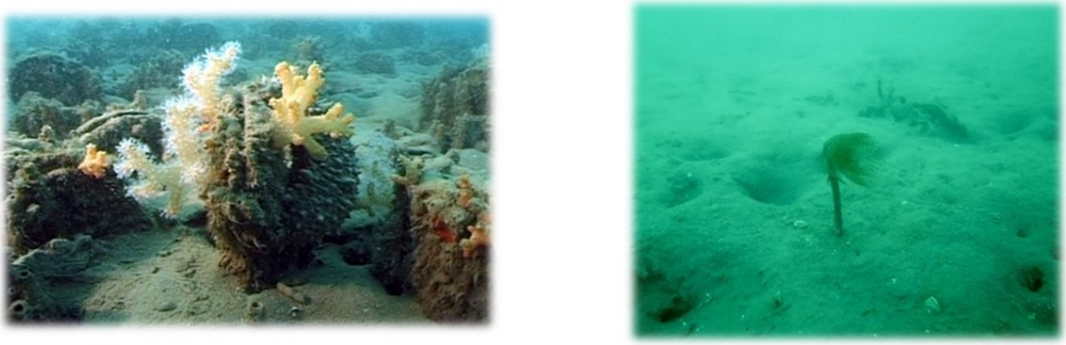
90. The Bioresearches report states that “Estimates of the time taken for a benthic community to recover from a disturbance event of the scale of sand dredging is between 6 months to several years. This is based on smaller biota with general short life spans re-establishing first from adjacent habitats and those larger species following but taking longer to grow to adult sizes.”

91. From calculations of dredging rates, they expect that it would take more than 25 years between dredging events if the whole area was utilized and that this would allow ample time

for benthic communities to re-establish. For horse mussels at least, their data do not support this.

92. Present in 2003, horse mussels were not recorded again until juveniles were found in 2017 (Bioresearches 2019). If this is the start of a recovery, it will take some time for them to mature and more for the ecological community to develop around them. Horse mussels are very large and take a long to grow – more than 10 years to reach mature size (Morrison et al 2014). Based on these dates, this is a fourteen year time interval between loss and re-appearance and if you allow ten years for them to grow to full size, whether, or not the ecological community associated has fully recovered, that is already 24 years. This about the time when the site will be dredged again so they do not really get to function as an ecosystem under this dredging regime.

93.  *Figure 1*



Horse mussels in Mahurangi Harbour – same place different habitat. Photo 1 c 1998 photo credit Simon Thrush; Photo 2 October 2016 photo credit Jenny Hillman

94. Figure 1. The impacts of scallop dredging in Mahurangi Harbour, pictures provided by Simon Thrush.

95. Biogenic habitats, like horse mussel beds, are now being seen as important for fisheries and their loss may explain why some commercial species do not recover even when quotas are cut (Morrison et al 2014).

96. The Scallop industry is in collapse because habitats have changed . NIWA reports on the Hauraki Gulf have noticed this decline. Half a century ago Scallops, Horse mussels, Dog Cockles and other bed forming bivalves were also common and not so today. Local Scallop fishermen Local scallop fisherman, Owen Marshall and Paul Mason Details have been fishing the Pakiri Te Arai coastline for 30 years. They say since the 1970's Scallop beds ran the length of the Mangwhai, Pakiri embayment. The Pakiri beds have now gone and they don't bother to come south of Te Arai Point as "in water at 25m depth one only pulls up dead shells everything is dead, six plus years ago everything was alive." Owen Marshal 2021

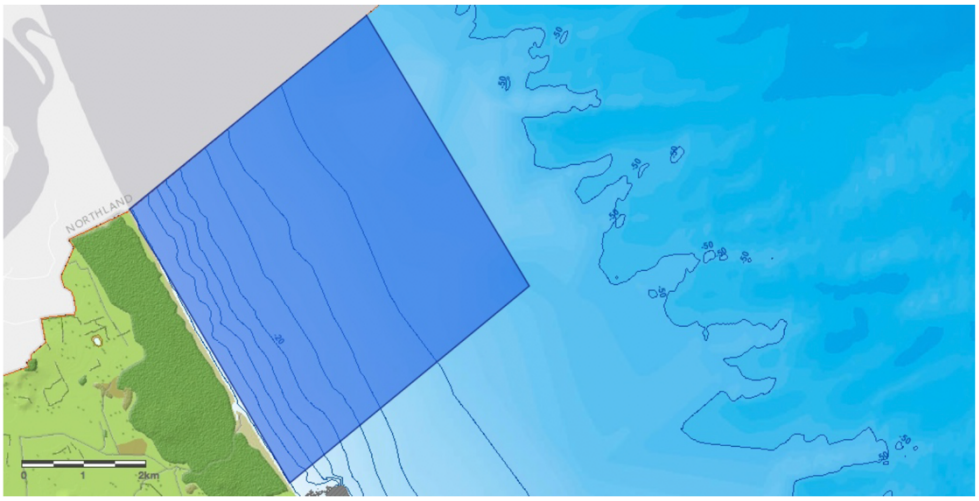
97. It is now commonly understood that the Hauraki Gulf was once home to abundant green lip mussels, horse mussels, cockles, pipi, tuatua and other native shellfish that formed expansive reefs and beds on the seafloor. Most of these beds have been lost from a lack of regard to the impacts that dredging and human activity has had on seafloor biodiversity.

98. Scientists like Simon Thrush have clearly sounded the alarm on the loss of shellfish beds (e.g. https://www.auckland.ac.nz/en/news/2019/01/17/urgent-action-save-marine-beds.html) and in the Hauraki Gulf substantial government funding has been provided to attempt the recovery of green-lipped mussels (https://www.scoop.co.nz/stories/PA1908/S00276/govt-helps-to-restore-shellfish-beds-of-hauraki-gulf.htm). It makes more sense to preserve them in the first place.

99. An area of 3204.4 ha. off the Pakiri Te Arai Coast including 5km stretch of the beach wither north and south of the Te Arai headland and out to 5km off shore has been identified and met the criteria for special marine protection. This means that, as a habitat, the horse mussel beds

are a habitat typical of the community type and a good examples will have value under the legislation. That Grace 2014 (figure 2) identified the area immediately to the north and south of Te Arai Point as a potential marine reserve suggests the values in this area are high.

8



Exposed sandy beach. About 5km of beach, either north or south of Te Arai depending on local criteria. Probably not including the rocky reefs of Te Arai. Out to about 5km offshore. This habitat is represented in MPAs only at Tawharanui in the HGMP, and then a much smaller area and less exposed. There is a complication of sand mining close to shore but possibly this may be phased out in a few years. There may also be an overlapping large offshore sand extraction licence area. Several reports and good biological survey information is available. There are shelly areas offshore.

Figure 2.The figure and text from Grace (2014) regarding a proposed marine reserve including part of the sand mining area. See also map of horse mussels on p.123 of NIWA Report, Anderson et al (2019)

100. All of the methods of sand extraction have effects on the sea floor and implications that are far reaching. The seafloor is directly interconnected to marine biodiversity health and the availability of food for sea and shorebirds and our own fisheries.

101. Sand taken is interconnected to the dune formation in dynamic nesting zones and habitat of the Fairy Tern. Sand dunes are not being replenished making their nesting habitats vulnerable to erosion and has impacts on the success of their breeding and nesting habitats. This year 40% of the Fairy Tern nests around the estuarine areas of Mangawhai and Pakiri were lost this

season due to the tide washing them away as their nesting habitats are now flat. The Fairy tern dune habitat has degraded by lack of dune replenishment. I think it can be argued that ongoing sand mining will result in loss of habitat, and has done so already.

Concluding Comments

102. Whakatauki from our Ngati Wai tupuna (below) cannot conclude our objections and values more succinctly.

> *E tangi ana nga reanga o uta, e mahara ana nga reanga a taima ta aha ra e whakamahana taku ora kia tina.*
>
> *When the land, river and sea creatures are in distress then I have nothing to be proud of (Ngāti Wai)*

103. Tangata Whenua do not give express consent to the continuation of any sand mining off Pakiri Beach. This is a preexisting case but earlier progress made to procedural matters has not been implemented with this application. Should this application be consented, we ask that meaningful consultation and engagement with us, as tangata whenua, be re-instated.

104. Time is running out real damage is occurring. Fundamentally we ask for better management of our seafloor biodiversity our *sea creatures the children of Tangaroa* because we consider based on our intimate every day observations that the ecological and whakapapa damage caused by sand mining is more than minor.

105. We ask that you view any decision you make with regard to AUP Chapter B6. to ensure that the planning framework that enables this activity in our moana is sufficiently coherent, current and comprehensive

106. We ask, in particular that sufficient weight be afforded to our treaty rights, values of matauranga and tikanga. The mauri of, and our relationship with, natural and physical taonga (resources) be maintained and restored

107. To err on the side of caution and decline this application so that no further damage to our whole ecosystem and sea floor ecology will occur so that it may heal itself and that our mana and relationship to it continues. Any future management decisions must involve us and be led by our values.

108. With the increasing development pressures on our rohe it is imperative that our future as Tangata Whenua of Pakiri and our special relationship with this area remains. As my father Laly quoted in his early objections *" if the authorities continue to be allowed to give away our sand without our express consent our future as Tangata Whenua of Pakiri and our special relationship with this area will be gone, like the sand never to be replaced*". (1993)

109. We wish to place on record here today that, should this application be approved despite our evidence and that of others pointing to justification for the declining the application, that Te Whanau o Pakiri will continue in our quest to cease this harm to our taonga, and therefore us. We do not wish to pass this matter onto yet another generation of our people.

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Ngati Manuhiri, Nga Taonga o Ngati Manuhiri