



Memorandum

To: Bendigo-Ophir Gold Project Expert Panel

From: Santana Minerals

Date: 17 August 2026

Re: RFI 11 Response Question 11 Spring Annuals and Cushionfields

Please find attached Matakanui Gold Limited's (MGL's) response to Request for Information (RFI 11) Question 11, which requested:

Part A: *The consensus expert position is that the propagation techniques for spring annuals are experimental and likely success unknown. What is a suitable measure of success for rehabilitation of cushionfields and spring annuals?*

Part B: If rehabilitation is not successful (after the expiration of a reasonable period during mine operation), what alternative form of compensation will be offered?

In response to **Part A**, MGL provides the memorandum *RFI 11 – Measures of Success for Rehabilitation of Cushionfields and Spring Annuals*, prepared by Dr Robyn Simcock, Senior Researcher Ecology and Soils, Bioeconomy Science Institute Maiangi Taiao. Dr Simcock proposes measurable success criteria for both spring annuals and cushionfields, together with implementation timeframes, monitoring requirements and adaptive management review points. The proposed criteria focus on increasing the number and extent of spring annual sub-populations within areas managed by MGL, developing propagation methods for *Ceratocephala pungens*, and increasing the area and condition of cushionfield communities through rehabilitation and ecological management.

In response to **Part B**, MGL provides a memorandum setting out the proposed compensation framework should the spring annual or cushionfield success criteria not be achieved. The framework provides for adaptive management reviews, revised work programmes, ongoing implementation where sufficient progress is being made, and ultimately additional conservation actions and legally protected habitat acquisition where outcomes cannot be achieved through the primary rehabilitation and management programme. The proposed compensation measures are intended to be commensurate with the extent of any shortfall against the agreed success criteria.

In addition, MGL attaches responses to recent memoranda submitted by the Department of Conservation (DOC) and Otago Regional Council (ORC) regarding the

2025 Spring Annual Survey. While these memoranda are not submitted in response to RFI 11, they raise matters directly relevant to the Panel's consideration of spring annual populations, rehabilitation, compensation and the significance of the identified populations. MGL considers it appropriate to provide responses at this time to assist the Panel's consideration of Question 11 and the wider spring annual evidence.

MGL's response to the DOC memorandum addresses matters relating to spring annual distribution, covenant management, future survey programmes, rehabilitation opportunities, the proposed protection of the Come-In-Time Pit populations, and the role of the proposed research, monitoring and management programmes. MGL considers that the proposed survey, research, rehabilitation and covenant framework provides a pathway to improving understanding and long-term protection of spring annual populations within the Bendigo landscape.

MGL's response to the ORC memorandum addresses comments regarding the distribution of spring annual populations, survey coverage, the significance of populations both inside and outside the Direct Disturbance Footprint, and the effectiveness of the proposed management framework. MGL considers that the proposed conditions, including ongoing surveys, applied research, adaptive management, compensation measures and the Come-In-Time protection mechanism, provide a comprehensive framework for managing uncertainty and addressing effects on spring annual species.

The attached responses conclude that:

- suitable and measurable success criteria can be established for both spring annuals and cushionfields;
- progress towards those outcomes can be assessed through monitoring, review and adaptive management processes;
- the growing understanding of spring annual distribution, habitat requirements and propagation opportunities provides an increasingly robust basis for management and rehabilitation efforts;
- the proposed survey, research and management programme will continue to improve understanding of spring annual ecology and inform future conservation actions;
- where success criteria are not achieved, a structured compensation framework can be implemented to address any remaining shortfall in ecological outcomes.

Together, the attached material provides MGL's response to Question 11 and demonstrates that clear success criteria, adaptive management processes and contingency compensation measures can be established for both spring annuals and

cushionfields. The proposed framework provides a pathway for ongoing research, monitoring, rehabilitation and conservation management throughout the life of the Project and beyond.