APPLICANT RESPONSES TO RELEVANT COMMENTS FROM OTHERS ON THE BENDIGO-OPHIR GOLD PROJECT

This document contains the key comments from the following parties:

- Tourism Industry Aotearoa;
- New Zealand Minerals Council;
- Business South Incorporated;
- Queenstown Business Chamber of Commerce;
- Santana Mine Supporters Group;
- Central Otago Winegrowers Association;
- Parliamentary Commissioner for the Environment;
- The Chinamans Terrace Services Company Ltd;[1] and
- Tim and Sheryl Crook.

[1] While some directors / shareholders were invited to comment on the BOGP Substantive Application as adjacent landowners individually, this company was not invited to comment.

Comments from Tourism Industry Aotearoa

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	Tourism in Central Otago has national and regional economic significance. Proper weight should be given to tourism's contribution to the national and regional economy.	Economics	**Response Evidence:** Evidence of Benje Patterson	MGL agrees and supports the comments made by Tourism Industry Aotearoa. Benje Patterson has commented on the overall scale of tourism across Inland Otago. In his evidence he notes that it should not be conflated with the small amount of tourism activity that occurs directly within and immediately surrounding the proposed mine site. The evidence below suggests that only about 0.3% of visitor days in Inland Otago can be directly related to activity on land adjoining the mine, which would be the equivalent to about $5.6 million of existing tourism GDP associated with these areas. There are examples in Australia of mining and tourism co-existing, for example the Hunter Valley which is within 50km of open pit coal mines.
2	Landscape is a leading reason for tourists visiting the region. Any conditions attached to the approval should reflect the need to protect landscapes on which the Central Otago tourism economy depends.	Planning	**Substantive FTA Application:** D.03 – Schedule One – Central Otago District Council and Otago Regional Council Common Conditions G.07A Landscape and Ecological Rehabilitation Management Plan	The proposed consent conditions in *D.03 – Schedule One – Central Otago District Council and Otago Regional Council Common Conditions* include an extensive suite of conditions relating to landscape and ecological rehabilitation, with a particular focus on achieving the outcomes set out in the Landscape and Ecological Rehabilitation Management Plan (**LERMP**). The LERMP is a key document which sets out the proposed management of effects of the Project on the landscape and ecology within the Project Site, with the primary objective to enable the modified mined landscape to be re-integrated into the Dunstan Mountains Outstanding Natural Landscape.
3	Cycle tourism, on which Bendigo is a part of, plays an important tourism role in Central Otago.	Economics	**Response Evidence:** Evidence of Benje Patterson	Previous research Benje Patterson prepared for Queenstown Lakes shows that about 338,000 visitors cycle, with $280 million of spending associated with visitors whose main motivation is to bike. Although Thomson Gorge Road is a highly regarded cycle journey within the cycling community (see Jonathan Kennett's evidence for Sustainable Tarras), the usage of Thomson Gorge Road is very low compared to cycling in the broader region identified above and even other backcountry cycle journeys. There are no bike counters on Thomson Gorge Road, as there are in some parts of the broader cycle trail network, but we can still form understandings from Strava, which is commonly used among cyclists to record activities. Over the past 90 days to 11 April 2026 on Strava there have been 23 riders cycling on the Strava segment covering Thomson Gorge Road ("Boundary Fence to Top"). Another backcountry ride within Inland Otago, which does have trail counters, and so can provide a point of comparison for scaling is the Coronet Loop, near Arrowtown, which had 336 riders during the same period on a Strava segment ("Picnic Rock Climb") on its backside away from busy trail heads that might inflate the data. The means based on cyclists recording their ride with Strava, the Coronet Loop shows 15 times the usage than Thomson Gorge Road. This Strava sample is only a portion of riders over the first 3 months of the year, but it can be scaled on an annual basis. The Queenstown Trails Trust Annual Report (2025) showed 3,971 uses of the Coronet Loop in 2025 – using this annual benchmark combined with the Strava data from Thomson Gorge Road suggests about 272 riders on Thomson Gorge a year.

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4	Independent evidence on tourism impacts should be sought and tested as part of this process	Economics	**Response Evidence:** Evidence of Benje Patterson	Evidence in relation to recreation impacts was provided by Mr Rob Greenaway. This included consideration of impacts on tourism activities. Tourism within Bendigo contributes to a very small proportion of the overall tourism within Central Otago. Only 0.3% share of the Inland Otago visitor days occur in areas directly adjoining the mine. Tourism activity will also not necessarily disappear due to the mining activities. The mine may in fact operate as an attraction, particularly given that mining history is already a key drawcard of visitors to Bendigo.

Comments from New Zealand Minerals Council

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	The Bendigo-Ophir project is managed by experienced, qualified and well-credentialed experts in all aspects of gold mining. While this is an impressive project with a great contribution to make to country, it is not unprecedented.	N/A	N/A	Comment acknowledged.
2	Mining is a key part of the primary production sector in NZ. If we do not mine what we have in NZ, we lose the opportunity to generate jobs and earn export receipts.	Economics	**Response Evidence:** Evidence of Benje Patterson	Recent estimates from Infometrics for 2025 put the estimate of New Zealand's Mining GDP at $3.17 billion (source: Infometrics Economic Profile).
3	The Minerals Strategy for New Zealand to 2040 and the Critical Minerals List for New Zealand lists 37 critical minerals, including gold. Gold and metallurgical coal are our main exports from mining, so they are critical to the Government's goal of doubling the value of our mineral exports to $3 billion by 2035. Gold exports were $1.8 billion in 2025 (Stats New Zealand) and gold is the number one goods export to Australia.	Economics	N/A	All gold will be exported from the BOGP.
4	Mining is temporary. When projects are completed, the land is returned to a restored, or enhanced, state. An example is the remediated OceanaGold Globe Progress mine site near Reefton on the West Coast of the South Island. This is Department of Conservation (DOC) land and has been handed back to DOC as a community asset.	MGL / Operations	N/A	MGL agrees.

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5	Mining in New Zealand contributes $2.07 billion to the Gross Domestic Product (GDP). Mining is 26.6% of the Waitaki District's GDP. Mining is one of the most productive sectors of the New Zealand economy. $458,952 is the value of what is produced per full time equivalent worker, compared with $174,045 across the whole economy. Santana Minerals reports that each job at its mine is expected to generate about $1 million in GDP annually.	N/A	N/A	Comment acknowledged.
6	Mining companies make a number of payments to the Government including royalties. In 2025, $19.6 million was paid in royalties. The royalties are paid into the New Zealand Consolidated Fund for general Government spending.	N/A	N/A	Comment acknowledged and MGL agrees.
7	Taxes paid by mining companies – corporate income tax (28 percent), PAYE, GST, and ACC; fees to access and use Crown land; and fees paid to New Zealand Petroleum and Minerals for permits.	Economics	**Substantive FTA Application:** B.01 Benje Patterson (People and Places) – Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025) **Response Evidence:** Evidence of Benje Patterson	The BPL report estimated government revenue at $1.8 billion, which is around $1.0 billion in NPV terms using the Treasury's 8% discount rate.
8	Santana Minerals has estimated $1.8 billion going back to New Zealanders through the Government over the life of the Bendigo-Ophir Gold Project including royalties at approximately $450 million; corporate tax at approximately $1.1 billion; and income taxes including PAYE and ACC at approximately $216 million. They say more than 60 percent of the gross profits will stay in New Zealand through dividends to New Zealand shareholders, taxes, and royalties.	N/A	N/A	Comment acknowledged.
9	Mining companies also pay significant rates to local authorities. They are often among the largest ratepayers in provincial districts. Santana reports they will be paying $1.25 million per annum to Central Otago District Council, inflation-indexed using CPI, to fund infrastructure, and environmental and community benefits packages as the council sees fit. This is in addition to standard rates.	Economics	**Response Evidence:** Evidence of Benje Patterson	Rates to local authorities were not covered separately in the Benje Patterson analysis.
10	Getting from prospecting to mining is a long and expensive process. Mining is New Zealand is an attractive investment because we have	N/A	N/A	Comment acknowledged.

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	relatively stable government and rules, regulations, and laws that provide suitable safeguards. The level of capital required does not sit in New Zealand which is why most large-scale mines have overseas investors/owners.			
11	Generally, most of the revenue generated by the mine stays in New Zealand in the form of payments to suppliers, wages, contractors, royalties, taxes, rates and spend on plant and machinery and in some instances, housing for miners. After these expenses, profits, which are a relatively small proportion of gross revenue, are retuned to shareholders, many of whom reside in New Zealand.	Economics	**Substantive FTA Application:** B.01 Benje Patterson (People and Places) – Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025) **Response Evidence:** Evidence of Benje Patterson	GNP of the mine is estimated at $230m a year, out of total direct activity of $360m a year in GDP terms.
12	Santana Minerals' total spend in New Zealand since incorporation has been more than $60 million, $23.6 million in the past 12 months. The company reports it has 33 full-time staff already working out of Cromwell, with another 30 contractors. Santana Minerals expects that more than 60 percent of its gross profits will stay in New Zealand through dividends to New Zealand shareholders, taxes, and royalties.	N/A	N/A	Comment acknowledged and MGL agrees.
13	Negative perceptions about mining's environmental impacts are often based on mining's past, or mining in jurisdictions where there is little oversight of working and environmental conditions, and are not supported by evidence. Environmental impacts from mining have reduced with the use of continually improving science and technology.	N/A	N/A	Comment acknowledged and MGL agree.
14	Virtually all industries impact the environment and throughout most of New Zealand, they are in a seismically active region. As a consequence, New Zealand is renowned for its seismic engineering capabilities. The reality of life is that we cannot de-risk everything so there has to be some acceptance of risk within the parameters of all steps being taken to best mitigate or plan for it.	MGL / Operations	N/A	MGL agree.
15	One of the many environmental safeguards are mine closure plans. You cannot just mine and walk away. Mining companies here spend millions of dollars restoring mine sites close to a pre-mining state and sometimes to become community assets, as the OceanaGold Globe Progress mine rehabilitation example demonstrates.	Planning and Rehabilitation.	**Substantive FTA Application:** B.40 Mine Closure Management – Mine Closure Plan (MCM 2025).	The Substantive Application includes a Mine Closure Plan provided as *B.40 Mine Closure Management – Mine Closure Plan (MCM 2025).* The Substantive Application includes a set of proposed conditions (that have been updated through this comment response period) for mine rehabilitation and closure that require the Consent Holder to submit an updated Mine Closure Plan within six months the commencement of the consents. The proposed conditions set out how

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			D.03 – Schedule One – Central Otago District Council and Otago Regional Council Common Conditions **Response Evidence:** Evidence of Chantelle Dodge	the Mine Closure Plan must ensure the rehabilitation and closure activities for the BOGP are undertaken to achieve defined objectives / outcomes (including any ongoing financial responsibility). Refer to the updated conditions in *D.03 – Schedule One – Central Otago District Council and Otago Regional Council Common Conditions* in Part 4 of this comment response package.
16	Provides two examples of water treatment options from mining used in NZ: 1. OceanaGold's passive water treatment option at its Globe Progress mine closure. 2. Discarded mussel shells for passive treatment of acid mine drainage.	MWM	**Substantive FTA Application:** Details of water treatment are provided in the Mine Waste Management B.06C Mine Impacted Water Overview Report (MWM, 2025) – Appendix M, which contains the review of active and passive treatment processes that may be required. **Response Evidence:** Further details on water treatment examples are provided in the evidence of Dr Paul Weber.	Active and passive treatment of mine impacted waters is well understood in New Zealand with many operating examples. Such treatment systems will work at the BOGP. However, further studies are required once suitable site-specific waters are available to confirm capacity and the treatment stages/processes.
17	Santana Minerals began engaging with the community about the Bendigo-Ophir project in June 2024. Since then, the company has (as of March 2026, and ongoing activities): > Held more than 70 community drop-in sessions > Given more than 50 presentations to community and business groups. > Interacted regularly with the closest affected residents, supported by a dedicated project manager. > Established a Community Liaison Group (September 2025) with quarterly meetings. > Attended regional events since September 2024 > Since October 2023, community updates on Radio Central, starting monthly and moving to weekly in August 2025. > Launched the Santana Minerals Facebook page in October 2025 for community updates (5,200 followers). > Engaged with mainstream media.	N/A	N/A	Comment acknowledged and confirmed by MGL.

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18	Since 2024, Santana has invested $84,500 in communities across the region. It is important to note that at this stage, the business is only spending money, not making money. The company has a formal sponsorship and donation programme, with criteria, that runs throughout the life of the mine.	N/A	**Substantive FTA Application:** F.16 MGL – BOGP Pre-application Engagement Report.	Comment acknowledged and confirmed by MGL.
19	The fast-track law is ideal for the large-scale, complex nature of mining projects which span rules, regulations and laws across central and local government jurisdictions. It provides a one stop shop without bypassing the environment.	N/A	N/A	Comment acknowledged.
20	Mining is capital-intensive and it takes a long time to get through the myriads of processes and regulations to physically start mining and get a return on that very large investment. While it is appropriate there are checks and balances, it should not take 10 years and cost millions of dollars to reach this stage, as time delays can turn off investors.	N/A	N/A	Comment acknowledged.

Comments from Business South Incorporated

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3	The economic projections contained in the BOGP application are indicative. The distribution of benefits is expected to be uneven, with some sectors likely to experience gains while others may face increased cost pressures or risk exposure.	Economics	**Response Evidence:** Evidence of Benje Patterson	GNP of the mine is estimated at $230m a year, out of total direct activity of $360m a year in GDP terms. Midpoint risks to viticulture and tourism in the immediate vicinity are estimated at $5m of GDP pa and $2.8m of GDP pa respectively.
4	Increased reliance on a single large project introduces vulnerability if the project becomes uneconomic or curtails earlier than expected.	Economics	**Response Evidence:** Evidence of Benje Patterson	It is economic diversification into a new high-value industry. It still represents a more resilient, diversified economy than the status quo, and the NPV over the project life is estimated at $3.1 billion.
5	Gold price volatility means the project's economic contribution is inherently variable and not guaranteed over the medium to long term.	Economics	**Substantive FTA Application:** B.01 Benje Patterson (People and Places) – Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025) **Response Evidence:** Evidence of Benje Patterson	NPV of the GDP effects of $3.1 billion generated in Inland Otago under the BPL report base case for direct GDP can also be compared against what the NPV of the direct GDP would be under the higher current spot prices, as well as lower gold price assumptions. In the high scenario, which reflects current gold prices the NPV of the direct GDP would be $5.0 billion, while under the low scenario which reflects the historical average from the 3-5 years before the PFS, the NPV of the direct GDP would be $2.1 billion.

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6	Tourism, agriculture, horticulture and wine industries are highly sensitive to environmental conditions and reputation, and their economic contribution is closely tied to long-term sustainability and market confidence.	Economics	**Response Evidence:** Evidence of Benje Patterson	Midpoint risks to viticulture and tourism in the immediate vicinity are estimated at $5m of GDP pa and $2.8m of GDP pa respectively. Evidence from the Hunter Valley in Australia suggests that premium wine regions can coexist with mining – there are vineyards within 2-4km of the Bulga open pit coal mine which employs more than 900 people. in New Zealand, there is no evidence that Rotorua's tourism sector has suffered lost income because of perceptions effects associated with visitors driving past the Waihi Mine just over one hour before they reach Rotorua. In Australia, the Hunter Valley is estimated to have a tourism sector worth over AUD$641 million annually, which is centred on the Lower Hunter Valley, which is located within 50km of the Bulga open pit coal mine (with another four mines located close to that site).
7	The relatively high incomes for project-related roles are likely to attract staff from existing businesses, place pressure on wages across affected sectors and increase difficulty in securing contractors/skilled trades people.	Economics	**Substantive FTA Application:** B.01 Benje Patterson (People and Places) – Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025) **Response Evidence:** Evidence of Benje Patterson	the Inland Otago economy has a long-term track record of progressively scaling its workforce capacity to respond to demand. For example, Infometrics Regional Economic Profiles show that over the 10 years to 2025, employment growth averaged 4%pa at an average of around 1,600 new jobs each year (16,048 in total over the decade), by comparison employment growth averaged 1.9%pa nationally over the same period.
8	Workforce development and workforce displacement may occur simultaneously, with the risk of labour competition arriving ahead of any training benefit. A clear workforce strategy, including local labour sourcing assumptions and sector-level engagement, is an essential condition of any approval.	Economics	**Response Evidence:** Evidence of Benje Patterson	The Inland Otago economy has a long-term track record of progressively scaling its workforce capacity to respond to demand. For example, Infometrics Regional Economic Profiles show that over the 10 years to 2025, employment growth averaged 4%pa at an average of around 1,600 new jobs each year (16,048 in total over the decade), by comparison employment growth averaged 1.9%pa nationally over the same period. MGL recently surveyed more than 600 people who had put in expressions of interest to work at the mine and almost two thirds already live in accommodation locally or have local accommodation.
10	The region's positioning as a "clean, green" brand underpins visitor demand and export value. The key issue for the Panel is whether this proposal can operate alongside existing high-value sectors without undermining the environmental attributes they depend on.	Economics	**Response Evidence:** Evidence of Benje Patterson	Just 0.3% of visitor days in Inland Otago occur on land immediately adjoining the mine site. The Inland Otago tourism sector is geographically spread out, with Cromwell 45km away, Wānaka located 45km away, and Queenstown about 80km away. As was highlighted in paragraph 107, 76% of visitor days in Inland Otago (3.8 million) occurred one hour's drive away from the Project site within the Destination Queenstown area centred on the Whakatipu Basin. Most visitors to Queenstown do not even pass through Central Otago on their journey, with Destination Queenstown Data in paragraph 107 showing that the majority of visitors arrive by plane. As long as the project is operating within the conditions of its approvals, there is little likelihood that this minority of visitors to Queenstown who drive past the mine site will associate their Queenstown

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				experience with having momentarily seen a mine from a distance, as they drive past at least one hour before they arrive in Queenstown. This point should also be considered in conjunction with evidence for the Applicant by Rhys Girvan of Boffa Miskell who assessed the visual effects of the mine as being low to moderate from state highways, with these effects reducing to neutral at closure. Evidence from elsewhere highlights supports the point that visitors are unlikely to associate their Queenstown experience with a mine located one hour's drive away. For example, in New Zealand, there is no evidence that Rotorua's tourism sector has suffered lost income because of perceptions effects associated with visitors driving past the Waihi Mine just over one hour before they reach Rotorua. In Australia, the Hunter Valley is estimated to have a tourism sector worth over AUD$641 million annually[1], which is centred on the Lower Hunter Valley, which was identified in paragraph 102 as being located within 50km of the Bulga open pit coal mine (with another four mines located close to that site). *[1] See: "Hunter Valley: The crown jewel of our region", available here: https://www.hunterif.com.au/news-1/cessnock*
11	Risk of water contamination needs to be carefully managed – direct operational implications for viticulture and horticulture and flow on effects on product integrity.	Environmental Chemistry / Water Groundwater Ecotoxicology	**Substantive FTA Application:** The risk of water contamination will be managed by the G.01 Water Management Plan, which is based on the studies completed as part of the assessment of environmental effects (AEE).	MWM: The assessment of environmental effects (AEE) recognises the potential effects on water quality (surface and groundwater). Hence significant effort has been undertaken to develop appropriate engineering controls to ensure the water quality limits can be achieved. The management processes are explained in the various management plans.
12	Risk of arsenic and dust exposure requires careful management.	Air Quality – Jeff Bluett	**Substantive FTA Application:** B.33 Pattle Delamore Partners - Assessment of Environmental Effects from the Discharge of Contaminants into Air (PDP 2025) - Sections 2.1, 3.1, 4.1.3, 5.3.1, 7.3, 9.1, 10.3 and 12.2 B.33 Pattle Delamore Partners - Assessment of Environmental Effects from the Discharge of Contaminants into Air (PDP 2025) – Sections 5.0 and 13. **Response Evidence:** Evidence of Jeff Bluett - Paragraphs 60 to 71.	In summary, I am confident that the actual effects from the site's emission of particles containing elevated levels of arsenic will be definitely less than minor and most likely negligible. To demonstrate compliance with this conclusion, MGL has committed to running an arsenic air quality monitoring programme that will establish background levels of this contaminant and ensure that the emissions form potential sources do not in reality generate any adverse effects on the receiving environment beyond the boundary of the site. The results from the arsenic monitoring programme will be reviewed by ORC and be made available to the public.
13	Cyanide management requires strict operational controls through the project lifecycle.	MGL	N/A	BOGP will operate under strict, enforceable New Zealand legislation and regulatory standards, governed by enforceable consent conditions, national water quality standards, and real-time operational controls.

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				The International Cyanide Management Code (**ICMC**) is a voluntary framework. Site systems will be compliant with the ICMC with strict monitoring of NaCN levels within the process plant and exit slurries. Process slurry passes through a cyanide detoxification circuit to remove cyanide prior to the process slurry leaving the processing plant and being deposited in the Tailings storage facility (**TSF**). Process control and monitoring include online NaCN monitoring (using cyanoprobe or equivalent), pH or DO probes with redundancy and HCN gas monitoring. Cyanide will be supplied by ORICA, who is certified under the ICMC for manufacturing and transportation of NaCN. Orica was one of the original signatories to the ICMC and the Yarwun, Gladstone, Australia manufacturing facility is certified as are their supply and transfer stations.
14	Risk of tailings storage failure, particularly in seismic events, while low probability has a high consequence on downstream effects on neighbouring land uses and industries.	Trevor Matuschka (EGL)	**Response Evidence:** Paragraphs 31-35 in Evidence of Dr Trevor Matuschka	TM: The tailings dam will be designed to meet the New Zealand Dam Safety Guidelines. These guidelines are based on international best practices. For earthquakes the TSF will be designed to withstand a 1 in 10,000 year earthquake. The seismic hazard study to determine the seismic hazard loading is based on the latest National Seismic Hazard Model released in 2022 and includes rupture of the Alpine Fault and large magnitude faults near to the site. The proposed design has the tailings contained behind a rockfill embankment that will also be buttressed by a large volume of rockfill placed in the Shepherds ELF. The proposed TSF will provide a very safe and robust tailings storage solution for both operation and post closure of the site. The detailed design will be independently peer reviewed as part of the Building Consent approval process for the tailings dam. I consider that the tailings dam will safely contain tailings when subjected to potential future extreme earthquakes.
15	Post-closure residual risk, and ongoing environmental liability, needs to be managed, including long-term groundwater effects.	Bonding Planning	**Substantive FTA Application:** B.44 Lane Associates Limited – Bond Introduction (Lane Associates 2025) **Response Evidence:** Evidence of Malcolm Lane	The proposed bond provides for the costs of the long-term post-closure site management that is expected to include a risk cost component covering residual risks. Refer to the proposed bond conditions that have been further amended / strengthened to respond to comments in *D.03 – Schedule One – Common Conditions for CODC and ORC Consents*, provided as Part 4 of this comment response package.
16	Additional workforce demand from the project has the potential to place further upward pressure on rents and house prices, reduce housing affordability for existing residents and undermine the ability of business across sectors to attract and retain staff. A housing management plan is needed as part of any approval.	Economics	**Response Evidence:** Evidence of Benje Patterson	Natalie Hampson on behalf of CODC agreed with Benje Patterson's assertion that housing supply in Inland Otago would respond in a way that could manage the long-term effects of demand from employment influenced by the BOGP. However, Ms Hampson did note that there would be temporary pressures related to initial project construction, but that these would be reduced to a manageable level with proposed worker accommodation.

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17	Increased workforce is likely to place pressure on local infrastructure, transport networks and community services.	Transport	**Substantive FTA Application:** B.30 (Integrated Transport Assessment) **Response Evidence:** Evidence of Andrew Metherell	The Integrated Transport Assessment and evidence of Andrew Metherell set out a range of mitigation measures including improvements to the road network to support changes in traffic safely and efficiently. MGL: In January, MGL canvassed the database of expressions of interest via an online survey posing a number of questions to enhance the recruitment planning. Of the 647 responses, 83% are based in New Zealand with 47% within Central Lakes, 27% elsewhere in the South Island and 9% in the North Island. In addition, 67% of respondents either live or have accommodation with one-hour drive of the mine site. 94% of respondents would use company provided transport from surrounding towns including Alexandra, Queenstown and Wanaka. Ultimately the recruitment phase will confirm the reality in regard to this comment. MGL has included an 80-person temporary construction camp and 20-site caravan park in this application to address any initial demands that can't be met by the market. MGL continues to investigage other solutions.
18	Assessment of infrastructure resilience and the capacity to maintain critical controls during and after a major seismic event, requires robust engineering design, independent verification and clearly defined contingency and response protocols.	Tailings Storage – Dr Trevor Matuschka Engineered Landforms – Eric Torvelainen Geotechnical – Peter O'Bryan	**Substantive FTA Application:** B.27 Engineering Geology Limited - Shepherds, Western and Srex Engineered Landforms and Come In Time Pit Backfill Technical Report (EGL 2025h) G.15 Engineered Landform Management Plan	Comment from Peter O'Bryan and Associates - with regard to seismic influence on open pits, while earthquakes are noted to have frequently triggered landslides in natural slopes, there are no known, positively identified, occurrences of earthquakes initiating large open pit slope failures. High magnitude events in highly active seismic zones close to operating large open pit mines in hard rock conditions have not produced significant slope instability. Earthquakes have produced small shallow slides and rockfalls in open pits but none on a scale sufficient to disrupt mining operations. A large earthquake could cause disturbance if weak soil-like materials are widely exposed. Comment from Eric Torvelainen: The Engineered Landforms will be resilient to earthquakes as they are constructed of rock fill and final slope are not particularly steep at 1 vertical to 3 horizontal. The silt ponds are unlikely to be operational during a large seismic event. In addition, refer to response to previous comment #14
19	Recommended conditions on real-time monitoring, independent auditing and baseline protection.	Air Quality – Jeff Bluett	**Substantive FTA Application:** B.33 Pattle Delamore Partners - Assessment of Environmental Effects from the Discharge of Contaminants into Air (PDP 2025) - Section 8.3 G23 Air Quality Management Plan. **Response Evidence:** Evidence of Jeff Bluett - Paragraphs 21 to 32	Having discussed this monitor relocation option with MGL in the context of the Central Otago Wine Growers and Business South's comments, MGL have opted to keep the Lake Clearview monitoring operational throughout the project and purchase a third real-time PM10 monitor for the second on-site dust monitoring location. This change is reflected in the updated AQMP (Appendix B).

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20	Recommended conditions on critical risk controls relating to arsenic, tailings management, trigger levels and seismic resilience.	Tailings Storage – Dr Trevor Matuschka Air Quality – Jeff Bluett Planning	**Substantive FTA Application:** B.33 Pattle Delamore Partners - Assessment of Environmental Effects from the Discharge of Contaminants into Air (PDP 2025) G23 Air Quality Management Plan **Response Evidence:** Evidence of Jeff Bluett - Paragraphs 60 to 71	Jeff Bluett (Air Quality) - I am confident that the actual effects from the site's emission of particles containing elevated levels of As will be definitely less than minor and most likely negligible. To demonstrate compliance with this conclusion, MGL has committed to running an As air quality monitoring programme that will establish background levels of this contaminant and ensure that the emissions form potential sources do not in reality generate any adverse effects on the receiving environment beyond the boundary of the site. The results from the arsenic monitoring programme will be reviewed by ORC and be made available to the public. In addition, refer to response to previous comment #14
21	Recommended conditions on post-closure monitoring, financial assurance and period environmental standards review.	Mine Closure – Chantelle Dodge Bonding Planning	**Substantive FTA Application:** B.40 Mine Closure Management – Mine Closure Plan (MCM 2025). D.03 - Schedule One - Central Otago District Council and Otago Regional Council Common Conditions	The proposed conditions of consent require MGL to establish and annually update a financial assurance (bond), the quantum of which is sufficient to cover long-term site remediation and management including potential risk events. The bond is provided to and can only be called on by the regulators, Otago Regional Council, Central Otago District Council, and possibly the Department of Conservation. It is inherent in the proposed conditions (for example Condition C116) that post-closure monitoring must continue until it is demonstrated that the closure outcomes have been achieved. These conditions have been amended / strengthened in response to comments and are provided in *D.03 - Schedule One - Central Otago District Council and Otago Regional Council Common Conditions* provided in Part 4 of this comment response package.
22	Recommended conditions on on-going engagement, cumulative impact assessment, reputation risk recognition.	Planning	N/A	MGL has reviewed this comment, however, the submission does not include any specific assessment or evidence on which to provide a considered response. Accordingly, MGL considers there is no technical or evidential basis to comment further.
23	Recommended conditions on workforce strategy, housing plan and local procurement.	Planning	**Response Evidence:** Evidence of Benje Patterson B.30 Stantec - Integrated Transport Assessment (Stantec 2025)	Refer to the statement of evidence prepared by Benje Patterson which provides an assessment of housing supply for workers (Theme 14). MGL does not agree to any conditions regarding this comment except where it relates to the management of effects that is required under this application including traffic effects as per the Integrated Transport Assessment, hours of work, and the forementioned camp and caravan park.

Comments from Queenstown Business Chamber of Commerce

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1	The economic benefits of the BOGP must be balanced against impacts on the region's dominant industries, particularly tourism and viticulture. These industries are highly sensitive to environmental quality, workforce availability and destination reputation.	Economics	**Response Evidence:** Evidence of Benje Patterson	Midpoint risks to viticulture and tourism GDP are estimated at $5m pa and $2.8m pa respectively.
2	The BOGP must operate with robust environmental safeguards to ensure existing industries that depend on the environment are protected.	Planning	N/A	Comment acknowledged and agreed. MGL has commissioned an extensive suite of independent technical advisors to assessment the potential adverse effects of the BOGP on the environment, including other surrounding landowners and industrial land-uses. The strict adherence to the proposed consent conditions (amended versions submitted in Part 4 of this comment response package) such as the proposed water quality compliance limits will ensure that the receiving environment will be suitably protected.
3	The Chamber accepts that the project constitutes a major contribution to the Central Otago economy.	N/A	N/A	Comment acknowledged, and MGL agree.
4	Concern that the current funding and royalty frameworks do not ensure mining revenues are adequately reinvested in the communities experiencing the impacts, potentially increasing pressure on existing commercial and residential ratepayers.	Economics	**Substantive FTA Application:** B.01 Benje Patterson (People and Places) – Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025) **Response Evidence:** Evidence of Benje Patterson	Benje Patterson notes Shamubeel Eaaqub recently in his role as Chief Economist at Simplicity calculated in early April 2026 (using Treasury, Departmental annual reports, and Stats NZ data) that the Otago Region currently receives a net fiscal transfer of $1,035 per capita from central government – i.e. there is $1,035 spent per capita more on each Otago resident than government receives from Otago in tax. MGL also notes a Minerals Strategy for New Zealand to 2040 was released in January 2025 by the Hon Shane Jones as Minister for Resources who is also, crucially for this comment, Minister for Regional Development. The strategy has a Delivery Roadmap that includes the implementation of regional deals package (royalty shares to regions). Furthermore, in March 2026, NZ First announced its campaign policy that will see 50% of any royalties gained from mining to be directly returned to the region from which it came. MGL supports this policy.
5	Viticulture and wine tourism strengthens the Central Otago economic base, with global brand value critically dependent on environmental quality and landscape integrity.	Economics	**Response Evidence:** Evidence of Benje Patterson	At present it is estimated that $10m pa of viticulture GDP currently occurs in the immediate vicinity of the BOGP Mine Site, with the estimate for tourism GDP currently occurring in that area being $5.6m
6	Mining is inherently finite. Tourism and viticulture are enduring industries, provided their core values are protected.	N/A	N/A	MGL acknowledges this comment but respectfully notes the Central Otago area was founded on mining activities.

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
7	Workforce strategies should focus on growing the labour pool, not simply reallocating it, through training, apprenticeships and new workforce entrants, supported by accommodation solutions that do not exacerbate housing pressures.	MGL	**Response Evidence:** Evidence of Benje Patterson	With regard to housing pressures - In January 2026, MGL canvassed the database of expressions of interest via an online survey posing a number of questions to enhance the recruitment planning. Of the 647 responses, 83% are based in New Zealand with 47% within Central Lakes, 27% elsewhere in the South Island and 9% in the North Island. In addition, 67% of respondents either live or have accommodation with one-hour drive of the mine site. 15% of the respondents currently live overseas and have a right to work in New Zealand via citizenship, residency or valid work visa. MGL is actively engaging with Otago Polytechnic, local high schools and other extractive industry participants to ensure training and apprenticeships are available to meet all demands
8	Fast track processes must not weaken the level of scrutiny required to protect the region's long-term economic foundations.	Legal	**Response Evidence:** Legal submissions, 17 April 2026 – Adequacy of Information	While the FTA framework consolidates and streamlines the approval process, it does not reduce or modify the substantiative standard of assessment required for a project of this nature and scale.

Comments from Santana Mine Supporters Group

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	Santana has made a substantial and sustained effort to inform the public and provide opportunities for engagement.	MGL	**Substantive FTA Application:** F.16 Bendigo-Ophir Gold Project Pre Application Engagement Report **Response Evidence:** Please see record of community drop-in sessions in evidence statement of Mr Damian Spring Appendix 4.	MGL agrees and supports the comments made by Santana Mine Supporters Group. In particular, Santana Minerals began engaging with the community about the Bendigo-Ophir project in June 2024. Since then, the company has (as of April 2026, and ongoing activities): > Held more than 70 community drop-in sessions; > Given more than 50 presentations to community and business groups; > Interacted regularly with the closest affected residents, supported by a dedicated project manager; > Established a Community Liaison Group (September 2025) with quarterly meetings; > Attended regional events since September 2024; > Since October 2023, community updates on Radio Central, starting monthly and moving to weekly in August 2025;

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				> Launched the Santana Minerals Facebook page in October 2025 for community updates (5,200 followers); and > Engaged with mainstream media.
2	The evidence indicates that the project is consistent with the purpose of the Act, which is to enable projects that deliver significant benefits while ensuring that environmental effects are appropriately managed.	Planning, Legal	**Substantive FTA Application:** A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements **Response Evidence:** Legal submissions, 17 April 2026 – Purpose of the Fast-Track Approvals Act 2004	The BOGP (including the proposed conditions) is entirely consistent with the purpose of the Act. The BOGP has also been developed to be consistent with the purpose of the underlying statutes due to the approach of MGL of managing the effects of the project, while enabling the nationally significant gold and deposits to be efficiently mined.
3	A survey of the Santana Mine Supporters group with 852 responses analysed show 99.4% expressing support, including 95.4% in full support and 4.0% subject to conditions.	N/A	N/A	Comment acknowledged.
4	Over 99% of survey respondents assessed the likely economic and employment impact as positive.	N/A	N/A	Comment acknowledged.
5	Survey respondents also identified broader economic benefits including increased household incomes, economic diversification and improved long-term resilience for Central Otago communities.	N/A	N/A	Comment acknowledged.
6	Supporters also recognise the project involves identifiable adverse effects in relation to groundwater, waste rock, tailings management, rehabilitation and closure obligations and long-term environmental stewardship. These should be addressed through clear conditions, ongoing monitoring and enforceable obligations including financial assurance mechanisms.	Groundwater, Environmental Chemistry, Tailings Storage, Rehabilitation, Mine Closure, Water Quality, Ecology, Planning,	**Substantive FTA Application:** The MWM MIW Overview Report (MWM, 2025) and associated appendices to that report clearly identifies the likely geoenvironmental hazards of the project. Management of these geohazards and the potential effects are explained in the ELF Management Plan and the Water Management Plan. See also Appendix B.40 Mine Closure Plan **Response Evidence:** Further details are provided in the evidence of Dr Paul Weber.	The management of geoenvironmental hazards and the potential effects on the receiving environment are managed by 6 key steps: > Determine the closure objectives for the mine. > Understand the source hazards. > Prevent oxidation of sulfide minerals. > Minimise the mobilisation of stored mobile oxidation products. > Control and treatment of mine-impacted waters. > Complete an assessment of the potential effects. > Monitor performance. The conditions of consent require establishment and maintenance of a bond that is sufficient to cover closure and subsequent costs, which is held by the regulators. In relation to rehabilitation and mine closure obligations, the Mine Closure Plan has been prepared to high standards, despite the fact that no specific NZ national or

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
				regional guidance on mine closure plan requirements exists. MGL proposes to update this plan every three years, in addition to the proposed consent condition which require the submission of a revised Mine Closure Plan at least 12 months prior to cessation of operations (C47). This will ensure new information or changes in risk profile are appropriately managed throughout the life of the operation.
7	The project is estimated to generate more than $2 billion in tax and royalty revenue over its life. Independent economic analysis estimates annual GDP contributions of approximately $360 million, with total economic impact around $5.8 billion over the life of the project	N/A	**Substantive FTA Application:** B.01 Benje Patterson (People and Places) – Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025)	Comment acknowledged.
8	Gold mining projects often evolve over time as exploration continues. Where geology supports it, additional resource discovery can expand both the scale and duration of economic benefits.	N/A	N/A	Comment acknowledged, and MGL agree.
9	Expected to create approximately 350 direct jobs with additional indirect and induced employment increasing total employment impacts to over 800 jobs. Average salaries are expected to be materially higher than current regional levels ($140k p.a).	N/A	**Substantive FTA Application:** B.01 Benje Patterson (People and Places) – Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025)	Comment acknowledged.
10	Project is seen as supporting the retention and return or skilled workers.	N/A	**Substantive FTA Application:** B.01 Benje Patterson (People and Places) – Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025)	Comment acknowledged.
11	Project has the potential to support population stability, school enrolments and local services.	N/A	N/A	Comment acknowledged.
12	A significant proportion of shareholders are NZ based, so a substantial share of the economic value generated by the project is retained within the domestic economy.	Economics	**Substantive FTA Application:** B.01 Benje Patterson (People and Places) – Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025) **Response Evidence:** Evidence of Benje Patterson	GNP shows that $230m pa is retained to NZ shareholders and NZ resident workers, out of a total estimate of $360m a year of direct GDP.

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13	Survey responses and the CODC Economic Development Strategy show the importance of economic diversification. Central Otago has benefitted from tourism and viticulture but both sectors are subject to external pressures. This project would strengthen economic resilience.	Economics	**Response Evidence:** Evidence of Benje Patterson	The project would support economic diversification into a new high-value industry. GDP per job for the project is estimated at $1.0 m a job, which is 7.7 times the Inland Otago average.
14	Environmental protection, water management, tailings storage, and long-term rehabilitation are identified as key areas of concern in survey responses.	N/A	N/A	MGL has reviewed this comment and notes that it raises several concerns regarding potential adverse effects of the BOGP. While MGL recognises that these concerns are genuinely held, the submission does not include any specific assessment or evidence on which to provide a considered response. Accordingly, MGL considers there is no technical or evidential basis to comment further.
15	Survey respondents also emphasise importance of monitoring, compliance and enforceable standards.	Planning	**Substantive FTA Application:** Part D and G of the Substantive Application.	MGL agrees. Refer to the proposed conditions and supporting management plans (provided in Part D and G of the Substantive Application, respectively) which set out clear compliance limits and monitoring procedures for the BOGP.
16	The Santana Mine Supporters have a level of confidence that the project has been designed with appropriate regard to environmental obligations, key risks have been identified and managed through engineering, environmental and regulatory frameworks.	Planning	**Substantive FTA Application:** Part D and G of the Substantive Application.	MGL agrees. Refer to the proposed conditions and supporting management plans (provided in Part D and G of the Substantive Application, respectively) which set out clear compliance limits and monitoring procedures for the BOGP.
17	Groundwater effects are localised and can be managed through monitoring and mitigation measures, subject to enforcement through conditions. Design reflects a controlled approach consistent with modern mining practice and NZ regulatory standards.	Groundwater	**Substantive FTA Application:** G.01 Water Management Plan	The Water Management Plan details the groundwater and surface water compliance and performance monitoring requirements.
18	Santana Mine Supporters recognise the tailings storage facility (contrary to some public commentary) is a managed largely solid landform with controlled water systems, monitoring and regulatory oversight.	Tailings Storage	**Substantive FTA Application:** B.21 Engineering Geology Limited – Shepherds Tailings Storage Facility Technical Report (Aug 2025).	MGL agree.
19	The Tailings Management Plan and storage facility design indicates that the tailings storage facility will be operated and monitored as a controlled system with multiple layers of oversight and accountability.	Tailings Storage	**Substantive FTA Application:** B.21 Engineering Geology Limited – Shepherds Tailings Storage Facility Technical Report (Aug 2025).	MGL agree.
20	*No comment provided*			
21	*No comment provided*			

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
22	Tailings storage facilities and operations in jurisdictions such as New Zealand are subject to strict environmental standards, independent technical assessment, and ongoing monitoring requirements. This reflects a regulatory and engineering framework designed to manage these risks to a high standard.	Tailings Storage	**Substantive FTA Application:** B.21 Engineering Geology Limited – Shepherds Tailings Storage Facility Technical Report (Aug 2025).	MGL agree.
23	The project is expected to have a limited visual impact due to its location and topography, with much of the site not readily visible from surrounding areas. Commitments to dark sky lighting principles further reduce potential effects on nighttime amenity.	Landscape	**Substantive FTA Application:** B.19 Boffa Miskell – Bendigo Ophir Mine: Landscape, Natural Character & Visual Effects Assessment (Aug 2025). B31 Cosgroves Limited – BOGP: Exterior Lighting Report (Sep 2025)	MGL agree.
24	The conservation covenant protects significant natural values. Santana Mine Supporters support project on the basis that the fast-track process enables integrated land management, where mining activity can co-exist with, and ultimately enhance protected areas.	Planning	**Substantive FTA Application:** *D.01 – CODC Land Use Consent and Conditions* **Response Evidence:** Evidence of Mark Chrisp Evidence of David Norton	MGL agrees and emphasises that the existing partial revocation of the Bendigo Conservation Covenant will cover approximately 888 hectares of land, while the proposed new covenant over ecological restoration and habitat enhancement areas will cover approximately 2,219 hectares of land that will be protected in perpetuity. It is also noted that the area of land where the Bendigo Conservation Covenant is proposed to be uplifted is approximately 11% of the conservation covenant. However, of the 888 hectares, slightly less than one third (252 hectares) will actually be impacted by mine development. As such, the actual area of the conservation covenant that will be directly impacted by BOGP is about 3% of the total covenant area. Refer to the proposed covenant Condition 122 in *D.01 – CODC Land Use Consent and Conditions* for further details.
25	Proposed rehabilitation approach is a mechanism to support long-term outcomes including sustained funding for weed and pest control and ongoing management of conservation values beyond life of project.	Rehabilitation	**Substantive FTA Application:** D.03 – Schedule One – Common Conditions for CODC and ORC Consents **Response Evidence:** Evidence of Robyn Simcock Evidence of Keith Barber	MGL agree. Refer to Landscape and Ecological Rehabilitation Management Plan (**LERMP**) and the proposed landscape and ecological rehabilitation conditions in *D.03 – Schedule One – Common Conditions for CODC and ORC Consents* for further details on the proposed rehabilitation approach that has been prepared by suitably qualified, independent technical experts. The proposed bond conditions that have been further updated in response to comments (*D.03 – Schedule One – Common Conditions for CODC and ORC Consents*) also provides an additional backstop ensure there is funding available to achieve the specified outcomes.
26	Provides examples of Waihi, Macraes, Cadia Valley (NSW), Boddington (Western Australia) – where gold mines operate alongside tourism, agriculture, orchard and vineyards – i.e. activities can occur concurrently.	Economics	**Response Evidence:** Evidence of Benje Patterson	There are several vineyards located along Wollombi Brook within 2-4 km of the edge of the Bulga Coal open cut mining operation which employs 940 people near Singleton. the Hunter Valley is estimated to have a tourism sector worth over AUD$641 million annually, which is centred on the Lower Hunter Valley, which was identified in

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
				paragraph 103 as being located within 50km of the Bulga open pit coal mine (with another four mines located close to that site).
27	Provides examples of former mine sites (Britannia Mine in Canada) which have transitioned into long-term tourism and heritage assets demonstrating that mining does not preclude other economic uses over time but can form part of a longer-term development pathway.	Economics	N/A	Due to compressed timeframes this is not directly addressed in evidence and example not validated.
28	The project should be considered not only in terms of its operational life, but also its long-term legacy. There is potential for the site to contribute to future tourism and community use, supporting local businesses and regional identity. Opportunities can be identified and developed progressively over the life of the project.	Economics and MGL (Operations)	N/A	MGL acknowledge and agree with comment.
29	It is essential that any approval includes: > Clear and enforceable consent conditions; > Independent monitoring and reporting; > Transparent public disclosure of environmental performance; and > Meaningful consequences for non-compliances.	Planning	**Substantive FTA Application:** D.01-D.04 – Land Use Consent and Regional Consent Conditions.	MGL agree. The proposed suite of consent conditions in Part D of the Substantive Application provide clear and enforceable conditions to manage identified potential effects across a broad range of technical disciplines. The proposed conditions also set out a comprehensive and robust approach to monitoring, including annual monitoring and compliance reports that cover reporting on a myriad of disciples including terrestrial ecology, iwi engagement, blasting, water takes, instream aquatic ecology works and works undertaken on Engineered Landforms and Tailings Storage Facilities.
30	A qualified Tailings Review Board should be established and maintained for the life of the project.	Trevor Matuschka (EGL)	**Response Evidence:** Evidence of Dr Trevor Matuschka – Paragraphs 13-16	Independent comprehensive dam safety reviews are required every 5 years by the Building (Dam Safety) Regulations 2022.
31	A ring-fenced financial assurance mechanism should be required, structured so that the bond increases progressively as the mine is developed, constructed, and operated.	Planning Bond	**Substantive FTA Application:** D.03 – Schedule One – Central Otago District Council and Otago Regional Council Common Conditions. **Response Evidence:** Evidence of Malcolm Lane.	The conditions of consent provide for a bond to be reviewed and updated annually, which provides for varying levels of disturbance as the project footprint increases and as rehabilitation progresses. Refer to *D.03 – Schedule One – Central Otago District Council and Otago Regional Council Common Conditions*.
32	Comprehensive groundwater and surface water monitoring programmes should be implemented, with clearly defined trigger thresholds and response actions. Monitoring data should be independently audited and reported publicly at regular intervals.	Surface Water and Environmental Geochemistry	**Substantive FTA Application:** Comprehensive groundwater and surface water monitoring are documented in the G.01 Water Management Plan.	The G.01 - Water Management Plan notes that annual groundwater and surface water monitoring reports will be prepared by a suitably qualified and experienced person (SQEP) and submitted to ORC for review. Reports will include: > A summary of monitoring undertaken over the preceding 12 months.

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
			Response Evidence: Further details are provided in the evidence of Dr Paul Weber.	> Discussion and evaluation of the monitoring data in relation to the relevant consent conditions. > Summary of actions undertaken in response to any action thresholds.
33	Regular independent environmental audits should be required, covering compliance with consent conditions, environmental management plans, and monitoring programmes.	Planning	**Substantive FTA Application:** D.03 – Schedule One – Common Conditions for CODC and ORC Consents G.01 Water Management Plan – Section 11.2	Annual groundwater and surface water monitoring reports will be prepared by a Suitably Qualified and Experienced Person (**SQEP**) and will be submitted to ORC for review. This is to be provided as part of the annual monitoring and compliance report set out in *D.03 – Schedule One – Common Conditions for CODC and ORC Consents*.
34	A stakeholder liaison group should be established for the life of the project.	MGL Planning	N/A	MGL disagrees and does not consider a stakeholder liaison group is required. MGL requires further details as to what the stakeholder liaison group would be comprised of, to provide a more considered response.
35	All cyanide and hazardous substances management should comply with internationally recognised standards, with independent verification. Storage, handling, and treatment systems should be subject to ongoing monitoring and audit.	Environmental Geoscientist	**Substantive FTA Application:** G.21 Hazardous Substances Environmental Management Plan	All cyanide and hazardous substances management will comply with New Zealand standards as detailed in the *Health and Safety at Work (Hazardous Substances)) Regulations 2017* and obtain / maintain appropriate licences for controlled substances. This will include all regulated requirements for chemicals associated with: > Labelling, signage, safety data sheets, and packaging. > Transport, primary and secondary containment, spill prevention, spill management, and spill reporting. > Duties to maintain a hazardous substances inventory, appropriately manage risks associated with hazardous substances, and review control measures. > Implementation of a training program for relevant site personnel. > Maintain an emergency response plan for unexpected releases and report unintended releases to appropriate authorities within required timeframes.

Comments from Central Otago Winegrowers Association

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	Central Otago wine is a cornerstone of the regional and national economy not for its scale but for its enduring economic, cultural and reputational value grounded in the integrity of the landscape.	N/A	N/A	Comment acknowledged.
2	Global wine tourism is growing at approximately 13% per year and is projected to reach over US$330 billion by 2034, driven specifically by experiential and sustainability oriented travel. Central Otago is well positioned to capture a significant share of that growth and a development that undermines the region's environmental narrative risks existing value and value that has not yet been realised.	Economics	**Response Evidence:** Evidence of Benje Patterson	With regards to wine tourism, it was already noted that direct activity that occurs at the vineyard is already included within the estimate that up to $10 million of direct viticulture GDP is generated in areas adjoining the mine site that were provided in paragraph 97. There will also be other spending associated with these wine tourists that are generated for other businesses (e.g. accommodation), form part of the estimated $5.6 million a year of tourism GDP supported by visitor days in areas adjoining the mine that were provided in paragraph 11 of my evidence. To give context to the potential scale of wine visitation, MBIE's International Visitor Survey for the 2025 year showed about 20% of visitors will go to a vineyard at least once during their holiday, which would mean that potentially around 3,500 of the 17,500 visitors to the areas adjoining the mine would be interested in wine tourism in the area.
3	The Central Otago wine brand is legally and economically tied to the integrity of its landscape through Geographical Indication status. The project risks undermining that landscape and has already disrupted the Bendigo GI application, threatening the authenticity, legal protection, and long-term value of the region's wine identity.	Economics	**Response Evidence:** Evidence of Benji Patterson	The Bendigo subregion is geographically broad and extends well beyond the immediate vicinity of the proposed mine. Given these geographical considerations, it is likely that only about half of the GDP within the subregion is generated by vineyards that sit in areas in the immediate vicinity to the BOGP. Overseas in areas such as the Upper Hunter Valley there is a long history of mining and vineyards coexisting.
4	Arbuscular mycorrhizal fungi, present throughout Central Otago vineyards and are critical to vine water and nutrient uptake, are more sensitive to heavy metal contamination than most other fungi. Long-term arsenic accumulation in soils, even at levels that do not produce observable plant physiological effects, could shift the soil biota from a fungi-dominated to a bacteria-dominated composition. This would occur gradually over many seasons and would be difficult to detect early. Impacts on vine health and wine character would potentially be irreversible and could continue long after mining has ceased.	Air Quality	**Response Evidence:** Evidence of Jeff Bluett – Paragraph 9	Noted. The primary potential migration pathway is via airborne dust. Monitoring and management will be undertaken to assess the site's emission of particles containing elevated levels of arsenic, with effects predicted to be definitely less than minor and most likely negligible. A baseline soil survey will be undertaken to determine pre-existing concentrations at the vineyard prior to commencement of mining operations so potential future effects can be evaluated, if required.
5	Mining by nature is a time limited activity. This creates a fundamental consideration for the Panel as the proposal introduces a short- to medium-term industrial land use into a landscape supporting a long-term, intergenerational primary production and tourism economy.	MGL	N/A	MGL has reviewed this comment and notes its concerns. No response is provided as the submission does not include any specific assessment or evidence on which to provide a considered response.

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
6	Not a question of impact management but of fundamental land use conflict.	Planning, Economics	**Response Evidence:** Evidence of Benji Patterson	Overseas in areas such as the Upper Hunter Valley there is a long history of mining and vineyards coexisting. This can be achieved in New Zealand as well.
7	Two material risk pathways for contamination pathways: > Direct deposition of arsenic-bearing dust onto grapes during the growing season, particularly during harvest. This is a direct food safety and market access risk, independent of any soil pathway. > Long-term accumulation of arsenic in vineyard soils with consequent disruption to soil biota, specifically Agree, as detailed in Section 2.3. This is a diffuse, cumulative, and irreversible risk.	Contamination Air Quality	**Response Evidence:** B.33 Pattle Delamore Partners - Assessment of Environmental Effects from the Discharge of Contaminants into Air (PDP 2025) - Section 8.3 **Response Evidence:** Evidence of Jeff Bluett - Paragraphs 60 to 72 Evidence of Julie Palich – Paragraph 9.	Jeff Bluett (Air Quality) - I am confident that the actual effects from the site's emission of particles containing elevated levels of arsenic will be definitely less than minor and most likely negligible. To demonstrate compliance with this conclusion, MGL has committed to running an arsenic air quality monitoring programme that will establish background levels of this contaminant and ensure that the emissions form potential sources do not in reality generate any adverse effects on the receiving environment beyond the boundary of the site. The results from the arsenic monitoring programme will be reviewed by ORC and be made available to the public. Julie Palich (Contamination) - Primary uptake pathways for arsenic are via root systems. Groundwater quality indicated low arsenic concentrations on the site boundary and a monitoring program is in place to identify changes to groundwater quality and risk to downgradient receptors.
8	Conclusion of the PDP air quality assessment is conditional on mitigation controls beings maintained.	Legal		Conditions operate to ensure that baseline criteria are met. If the necessary measures to meet these controls are not maintained that would result in a breach and potentially be subject to enforcement action. The Panel is required to assume that conditions will be complied with.
9	High arsenic soil stockpile located in southwest of project area, under predominantly north-westerly and south-easterly wind conditions direct deposition to Bendigo vineyards is assessed as unlikely during normal operations. However, Santana's own meteorological data shows frequent high PM10 events from November – April, the risk is low on average it is not zero.	Air Quality	**Substantive FTA Application:** B.33 Pattle Delamore Partners - Assessment of Environmental Effects from the Discharge of Contaminants into Air (PDP 2025) - Sections 2.1, 3.1, 4.1.3, 5.3.1, 7.3, 9.1, 10.3 and 12.2 **Response Evidence:** Evidence of Jeff Bluett - Paragraphs 60 to 72	The high PM10 events that COWG are referring to occur when the wind is less than 5 m/s from the east o between 10-15 m/s from the north (Figure 30 of the AQA). These peak events are not caused by PM10 emissions that have come from the MGL site. I am confident that the actual effects from the site's emission of particles containing elevated levels of As will be definitely less than minor and most likely negligible. To demonstrate compliance with this conclusion, MGL has committed to running an As air quality monitoring programme that will establish background levels of this contaminant and ensure that the emissions form potential sources do not in reality generate any adverse effects on the receiving environment beyond the boundary of the site. The results from the arsenic monitoring programme will be reviewed by ORC and be made available to the public.
10	Processing Plant will discharge gaseous contaminants including hydrogen cyanide and ammonia. These are chemically distinct from dust and present separate deposition pathways with different consequences for organic certification.	Air Quality	**Substantive FTA Application:** B.33 Pattle Delamore Partners - Assessment of Environmental Effects from the Discharge of Contaminants into Air (PDP 2025) - Sections 1.5.2. 2.2, 3.2, 4.2, 6.0 and 12.0 **Response Evidence:**	Gases are sufficiently light that they are not affected by gravity and remain suspended in the atmosphere while being diluted by clean air and in the case of HN3 and HCN eventually chemically changed to other chemically inert species. This means that the gases discharged from the processing plant could, in theory, reach the vineyards if the plume meander travelled this quite circuitous pathway. In my opinion, given the travel distance and the small amounts discharged from the plant, the quantity of any gaseous contaminant that reached the vineyard would be at

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
			Evidence of Jeff Bluett - Paragraphs 56 to 59	extremely low concentrations and likely be below the limits of detection for commercially available monitoring equipment. In my opinion, given the travel distance and the small amounts discharged from the plant, the quantity of any gaseous contaminant that reached the vineyard would be at extremely low concentrations and likely be below the limits of detection for commercially available monitoring equipment.
11	Internal inconsistency in Santana's Water Management Plan: the document contains conflicting provisions as to whether mine pit water, which will carry elevated arsenic and sulphide concentrations from dewatering, can be used for dust suppression on haul roads within approximately 970 metres of Bendigo vineyards. This requires clarification before any consent is issued.	Environmental Geochemistry / Water	**Substantive FTA Application:** Water and Load Balance Model (B.06C MWM MIW Overview Report – Appendix N). G.01 Water Management Plan	Mine pit sump water may be elevated in Potential Constituents of Concern (**PCOC**). This will be a greater issue later in the mine life when the pit is larger (i.e., larger pit wall exposures). Monitoring of pit sump water quality will confirm if its suitable for dust suppression activities outside of the pit catchments. Monitoring of surfaces that have pit water applied also needs to be undertaken to consider salt build-up. Performance monitoring is required for runoff from haul roads and other similar areas.
12	COWA established baseline arsenic conditions across the Bendigo vineyard area prior to any mining activity. Sampling of five irrigation groundwater bores at Bendigo vineyards — including Mondillo, Folding Hill, Quartz Reef, Schoolhouse, and China Terrace — found arsenic concentrations below the laboratory limit of reporting (0.0011 g/m^3) in every bore. A surface water sample taken from the Lake Dunstan Lakefront Irrigation Scheme also returned arsenic below the limit of reporting. Current soil arsenic within the vineyards ranges between 3.93 and 9.03 mg/kg — within expected background concentrations for this geology and well below applicable thresholds. Arsenic in the current environment, in every medium that matters for viticulture and winemaking, is effectively undetectable.	Environmental Geochemistry/Water – Paul Weber Groundwater – Jens Rekker Contamination – Julie Palich	**Substantive FTA Application:** B.03 Kōmanawa Solutions Limited - Groundwater Existing Environment and Effects Assessment (Kōmanawa 2025b). B.04 Kōmanawa Solutions Limited Surface Water and Catchment Existing Environment Effects Assessment (Kōmanawa 2025c).	KSL: That the Bendigo Aquifer and Clutha River / Mata Au have low arsenic concentrations is acknowledged. However, surface water and groundwater draining the Shepherds Creek and Bendigo Creek have more elevated dissolved arsenic concentrations. Setting compliance or performance monitoring thresholds that rest below the existing baseline concentrations for arsenic would serve little purpose. The characterisation of the area's creeks and aquifers systems to receive and pass on dissolved arsenic is key to formulating multiple layers of containment, seepage interception, proximal water monitoring and receiving water monitoring to ensure effects on water quality are minimised. Surface water performance monitoring is proposed for Bendigo Creek in the lower creek, backed up by groundwater compliance monitoring in the Bendigo Aquifer at 'Base Bore'. Groundwater compliance monitoring limits are set at 0.01 mg/L, while laboratory detection limits will be 0.001 mg/L.
13	Santana's proposed compliance regime does not adequately protect the baseline. WWLA identifies structural flaw in how arsenic compliance limits were set: > The proposed surface water arsenic compliance limit of 0.045 mg/L is the 90% ANZG species protection threshold, derived with reference to Rise and Shine Creek — which carries naturally elevated arsenic from historic hard-rock mining. Shepherds Creek, which is the primary discharge point for all water leaving the proposed mine area and which ultimately soaks into the Ardgour Alluvial Aquifer and through to the Bendigo Aquifer, has current arsenic concentrations of 0.0008–0.0024 mg/L. The	Ecotoxicology – Greg Ryder Groundwater – Jens Rekker Hydrogeology – Ryan Burgess	**Response Evidence:** Further details are provided in the evidence of Ryan Burgess. Paragraph 37 in Evidence of Greg Ryder Evidence Jens Rekker	Hydrogeology - D.04 condition 30 is proposed to develop trigger levels at which implementation of contingency seepage interception systems may occur (it is noted other remedial actions may be more appropriate). I recommend triggers be a combination of measured solute concentration levels and qualitative trend analysis. Arsenic is included in the proposed suite of solutes to monitor for in groundwater (see G.01). Kōmanawa - see response to Comment 12, above. Greg Ryder - Recommend that an additional condition relating to groundwater monitoring be considered, whereby if the concentration for a particular contaminant exceeds 50 % of the MAV value, that triggers an investigation response and an increase in the monitoring frequency.

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	proposed compliance limit represents a 20–50-fold increase over current Shepherds Creek baseline before any regulatory action is triggered. This is not protective of the resource that Bendigo vineyard operators depend on. > The drinking water standard for arsenic is 0.01 mg/L. The proposed groundwater compliance threshold is set at the maximum acceptable value — meaning any exceedance triggers action only after the drinking water standard has already been breached. There is no early-warning tier. WWLA recommends a two-step response procedure: a review level well below the maximum acceptable value, and a defined action level, with monitoring of upward trends as the primary alert mechanism.			
14	The interconnected nature of the aquifer systems serving Bendigo vineyards. Shepherds Creek soaks into the Ardgour Alluvial Aquifer well short of the Lindis River; that aquifer discharges into the Lindis, which in turn recharges the Bendigo Aquifer. Contamination does not dilute into a major river — it concentrates into the aquifer from which vineyard irrigation bores draw.	Groundwater – Jens Rekker	**Response Evidence:** Evidence by Jens Rekker	KSL: The Bendigo Aquifer water balance is overwhelmingly dominated by the influence of the Clutha River / Mata Au, meaning the conceivable but unlikely pathways between Ardgour Aquifer and Bendigo Aquifer via the Lindis River would be unlikely to produce groundwater effects exceeding groundwater compliance limits or ANZECC 2000 irrigation maxima.
15	Arsenic contaminated groundwater is already present at the site, and pit dewatering could mobilise it toward vineyard aquifers. While a closed loop system is proposed, the lack of a groundwater monitoring well at the base of Shepherds Creek means early detection and intervention for potential contamination are currently not ensured.	Groundwater – Jens Rekker Hydrogeology – Ryan Burgess	**Substantive FTA Application:** B.02 Kōmanawa Solutions Limited Bendigo Groundwater Bore Take Effects Assessment (Kōmanawa 2025a). B.03 Kōmanawa Solutions Limited - Groundwater Existing Environment and Effects Assessment (Kōmanawa 2025b). **Response Evidence:** Further details are provided in the Evidence of Ryan Burgess.	Hydrogeology - Groundwater monitoring is proposed at many locations along Shepherds Creek, including the 'base', see G.01. Proposed monitoring close to potential contamination sources (e.g., mine waste storage facilities) will allow for early detection and intervention (if required), as is leading practise. Kōmanawa - Vineyards over the Bendigo Aquifer, are primarily replenished with water from the Clutha River (>75%), while Bendigo Creek inflow to the Bendigo Aquifer is less than 7% of groundwater throughflow in the southern part of the Bendigo Aquifer. Groundwater monitoring bores that include compliance limit concentration of 0.010 mg/L for arsenic, are proposed for the Shepherds Creek alluvium and Bendigo Aquifer near the inflow of the Bendigo Creek. These are in addition to monitoring with surface water compliance limits set for Shepherds creek at the site boundary and a Bendigo Creek tributary, Clearwater Creek, on the southern site boundary.
16	Long-term water treatment and monitoring requirements extending beyond the life of the mine. This exceeds the typical duration of a resource consent by a significant margin, raising unresolved questions about re-consenting obligations, financial assurance, and regulatory continuity across what may be multiple generations of regulatory frameworks.	Legal – Lane Neave	**Response Evidence:** Legal Submissions, 17 April 2026 at Duration of Water Permits	We agree with ORC that the Panel could validly form the view that a longer duration is appropriate in this instance.

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
17	High consequence environmental effects associated with a failure of the TSF.	Tailings Storage – Trevor Matuschka	**Response Evidence:** Evidence of Dr Trevor Matuschka - Paragraph 9	Geotechncial –I (Trevor Matuschka) have been involved in the design, construction, and operation of many TSFs in New Zealand, Australia, Asia-Pacific, South America, and Africa. They include valley and paddock styles, different types of tailings dams (downstream, centreline, and upstream constructed from natural soils, waste rock, and tailings (including filtered tailings), and different geological, seismological and meteorological conditions. The proposed tailings dam at Bendigo would be close to having the lowest likelihood of breach of all those that I have been involved with. This is because it is of downstream construction and is buttressed by the Shepherds Engineered Landform (ELF) from very early on its operation. The final ELF extends approximately 1.1 km downstream of the crest of the tailings dam and is higher than the TSF (up to 70 m higher). With a buttress this large there are no credible modes of failure, including extreme seismic or flood events, that could lead to a mass release of tailings.
18	Equity considerations in water allocation and permit duration.	Legal – Lane Neave	**Response Evidence:** Legal Submissions dated 17 April 2026 at 'Water Quantity'	The evidence of MGL provides the Panel with the comfort that the BOGP will not impact the downstream availability of water. The allocation sought is well within available allocation for both groundwater and surface water resources. MGL's technical assessments confirm that existing water permit holders will be able to access their consented allocation in full throughout the life of the view.
19	Most significant concern is not immediate contamination but is: > Gradual accumulation of contaminants. > Potential disruption to soil biology. > Long term impacts on vine health and wine expression.	Ecotoxicology Contamination Air Quality	N/A	MGL has reviewed this comment and notes that it raises several concerns regarding potential adverse effects of the BOGP. While MGL recognises that these concerns are genuinely held, the submission does not include any specific assessment or evidence on which to provide a considered response. Accordingly, MGL considers there is no technical or evidential basis to comment further. However, it is acknowledged a baseline soil survey has been proposed to enable assessment of future potential effects.
20	The specific mechanism of concern is the sensitivity of arbuscular mycorrhizal fungi — present universally in Central Otago vineyards — to arsenic accumulation. These fungi improve vine root area, and thereby water and nutrient uptake, by orders of magnitude.	Groundwater Ecotoxicology Air Quality	N/A	Refer to the response provided to comment number #4 and #7 above in this table.
21	Notably, there are currently no ecological threshold standards for arsenic in New Zealand vineyards against which to assess accumulation risk. Santana's own Preliminary Site Investigation recommends that such thresholds be derived but they have not been. The Soil Management Plan uses human health thresholds only, not ecological thresholds, as its performance criteria. The Panel is being asked to approve a project whose soil management regime does not yet have the scientific tools in place to determine whether it is	Contamination	**Substantive FTA Application:** N/A **Response Evidence:** Evidence of Julie Palich - Paragraph 9	Soil studies undertaken for the project have screened soil results against published criteria for arsenic for the protection of human health risks as well as the Eco-SGV (95% protection) for arsenic. The Eco-SGV (95% protection) are presented in the Soil Management Plan however have not been adopted as arsenic concentrations both within and outside the previous mining footprint exceed the Eco-SGV due to the mineral-enriched environment.

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
	functioning as intended for the most sensitive receptor: vineyard soil ecosystems.			
22	Tourism and economic evidence before the Panel confirms that landscape is a primary driver of both visitor behaviour and regional value, and that even perceived changes to environmental quality can result in material economic impacts.	Economics	**Response Evidence:** Evidence of Benje Patterson	Benje Patterson has commented on the overall scale of tourism across Inland Otago. In his evidence he notes that it should not be conflated with the small amount of tourism activity that occurs directly within and immediately surrounding the proposed mine site. The evidence suggests that only about 0.3% of visitor days in Inland Otago can be directly related to activity on land adjoining the mine, which would be the equivalent to about $5.6 million of existing tourism GDP associated with these areas. It is worth noting that in the Hunter Valley (NSW) major tourist activity exists within 50km of Open Pit Coal mines.
23	Mines are not massive employers. In contrast wine industry beneficiaries are local and the profits stay in the region.	MGL Economics	**Response Evidence:** Evidence of Benje Patterson	COWA made claims in its evidence that the beneficiaries of this viticulture GDP are all locals, and that majority of the BOGP GDP will flow offshore. This assertion is incorrect with regards to the BOGP. Calculations in paragraph 38 showed that GNP from the BOGP ($230m a year) was estimated at 64% of direct GDP ($360m a year). In contrast, we do not know how much of the benefits of viticulture GDP in the area adjoining the mine remain in New Zealand as GNP. COWA did not substantiate its assertions with evidence of the residencies of shareholders in each vineyard or the origins of the vineyards' workforces. Research for CODC released in 2024, based on surveys of Central Otago vineyards showed that three quarters (74.5%) were temporary overseas workers (backpackers and RSE staff). As a point of comparison, MGL's survey of people who have expressed an interest in working at the mine shows just 3% of workers would require visa sponsorship to take up roles at the mine.
24	Arsenic compliance limits for surface water are set with reference to Rise and Shine Creek rather than Shepherds Creek, meaning the proposed limits do not reflect the actual receiving environment relevant to Bendigo vineyard water supplies. They should be revised downward to reflect Shepherds Creek baseline conditions and the direct hydraulic connection between that creek and the Bendigo Aquifer.	Ecotoxicology – Greg Ryder	**Substantive FTA Application:** B.07 Greg Ryder Consulting - Recommended Water Quality Compliance Limits for the Bendigo Ophir Gold Project (Ryder 2025) **Response Evidence:** Evidence of Benje Patterson	Groundwater monitoring bores that include compliance limit concentration of 0.010 mg/L for arsenic, are proposed for the Shepherds Creek alluvium and Bendigo Aquifer near the inflow of the Bendigo Creek. This is equivalent to the arsenic MAV in the NZ drinking water standards for potable water. Monitoring bores are in addition to monitoring with surface water compliance limits set for Shepherds creek at the site boundary and a Bendigo Creek tributary, Clearwater Creek, on the southern site boundary. Greg Ryder - recommend that an additional condition relating to groundwater monitoring be considered, whereby if the concentration for a particular contaminant exceeds 50 % of the MAV value, that triggers an investigation response and an increase in the monitoring frequency. Refer to comment #13 above for further response.

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25	The proposed real-time dust monitoring location is to be relocated from Lake Clearview, which is situated close to horticultural receptors and was used for baseline data collection, to Ardgour Terrace near mine administration. This removes the monitoring point that is most relevant for detecting whether dust is reaching vineyards. COWA requests that Lake Clearview monitoring be retained as a condition of consent, with additional monitoring near the boundary of the mine closest to horticultural receptors.	Air Quality	**Substantive FTA Application:** B.33 Pattle Delamore Partners - Assessment of Environmental Effects from the Discharge of Contaminants into Air (PDP 2025) – Section 8.3 G.23 Air Quality Management Plan. **Response Evidence:** Evidence of Jeff Bluett - Paragraphs 28 to 32	MGL have opted to keep the Lake Clearview monitoring operational throughout the project and purchase a third real-time PM10 monitor for the second on-site dust monitoring location. This change is reflected in the updated Air Quality Management Plan (provided in Appendix B to Jeff Bluett statement of evidence).
26	Santana's Water Management Plan contains conflicting provisions as to whether pit water, which will carry elevated arsenic and sulphide concentrations, may be used for dust suppression. This internal inconsistency has not been resolved in the application and must be clarified, with a defined water quality standard specified if pit water use for dust suppression is to be permitted.	Environmental Geochemistry / Water Ecotoxicology	N/A	Refer to the response provided to comment number #11 above in this table.
27	Neither the Soil Management Plan nor the Mine Closure Plan contains the contingency procedures that would govern a response to an uncontrolled discharge, whether of dust, sediment, or water, during active mining or closure. Conditions of consent should require that contingency procedures, including response protocols, notification obligations, and remediation pathways, be defined before any site disturbance commences.	Planning	**Substantive FTA Application:** D.03 - Schedule One - Common Conditions for CODC and ORC Consents (17 April 2026)	This comment does not provide specific alternative condition or amendments and as such, we have not considered this matter further due to the compressed timeframes and no changes to the conditions have been made at this time.
28	The water treatment obligation post-closure, estimated at approximately 50 years for active treatment and several additional decades for passive treatment, significantly exceeds a standard discharge consent duration of 30–35 years. Conditions should require safeguards to ensure that consent can be renewed and that treatment standards can be upgraded to meet any more stringent future requirements, so that the system does not at any point operate without regulatory oversight.	Planning Legal	**Response Evidence:** Paragraphs 9-10 'Evidence of Mark Chrisp (Planning) on behalf of Matakanui Gold Limited in response to expert panel further information request received on 1 April 2026'.	As the Consent Holder, MGL will be solely responsible for the construction, operation, maintenance and eventual decommissioning of the active Water Treatment Plant ("**WTP**") and passive treatment system ("**PTS**") for the duration of the consents sought and for any future consents required in the future. A new consent condition is proposed to confirm that the Consent Holder is solely responsible for all ongoing maintenance of the WTP and PTS and this responsibility cannot be transferred to any other person without written approval of Otago Regional Council. Refer to the updated conditions in *D.02 - ORC Consents and Conditions (17 April 2026)* provided in Part 4 of this Comment Response Package.
29	The Community Liaison Group the group is controlled by the company, has no requirement to respond to community input, no formal role in decision making, and limits independent communication. As a result,	MGL	N/A	Please see excerpt from MGL Community Liaison Group Charter of Understanding: ***1. Purpose*** *The Community Liaison Group (CLG) is established by Matakanui Gold Limited (MGL) to facilitate open communication, collaboration,*

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
	the CLG cannot be taken as evidence of genuine consultation, community support, or a social licence to operate.			*and mutual understanding between the Bendigo-Ophir Gold Project (BOGP), community and relevant stakeholders. The CLG aims to address concerns, share information, and foster cooperative relationships to support community well-being and project success.* The Charter also states objectives and all members of the CLG have signed the Charter to acknowledge the CLG purpose.
30	The Panel is required to consider regional and national benefits. COWA submits: > The existing wine and tourism economy is itself a significant and compounding regional benefit. > The proposal introduces risks that are long-term, cumulative, and in some cases irreversible	Legal Economics	**Response Evidence:** Evidence of Benje Patterson	Refer to Response 2 above. Several parties commented that alongside direct effects, perceptions related to mining by the BOGP, could indirectly affect sales of wine from vineyards across the rest of the Central Otago wine region through branding effects. Such indirect effects are not anticipated if the BOGP is operating within the conditions of its approvals. The Central Otago wine region is geographically spread out, with Bannockburn 30km away from the mine site, and Gibbston 55km removed. Evidence from the Hunter Valley in Australia suggests that premium wine regions can coexist with mining. Paragraph 97 highlighted several vineyards within 2-4km of the Bulga Coal open pit mine employing 940 people by Singleton. Furthermore, there are another 150 premium vineyards in the Lower Hunter Valley which operate within less than 50km of the Bulga Coal mine. Not that in addition to Bulga, there are also 4 other open pit coal mines in total in the Singleton area where the Bulga Coal mine is located, with other coal mines also located elsewhere in the Hunter Valley.
31	Economic evidence further indicates that the projected benefits of the proposal are likely overstated, while key costs, including impacts on existing industries and long-term environmental effects, are not fully accounted for. In assessing those projected benefits, the Panel should note that Santana's economic assessment was commissioned by Santana.	Economics	**Response Evidence:** Evidence of Benje Patterson	Midpoint risks to viticulture and tourism are estimated at $5m pa and $2.8m pa of GDP respectively. No other costs, related to potential environmental and wellbeing effects were quantified in the BPL report in monetary terms. From an economics perspective, costs related to these non-economic effects can't all be estimated in a way that allows for consistent comparisons with the economic benefits. These non-economic effects rely on intangible factors that do not all readily have market values and so such monetisation would introduce errors and lead to an inconsistent comparison between the economic benefits and these types of other potential effects. Although environmental effects are not anticipated if the Project is operating within the conditions of its approvals, further comments related to environmental risks are outside of my area of expertise and are addressed in the evidence of other experts.
32	It uses GDP as its primary metric, which measures gross value added. It does not show where after-tax profit flows. As an Australian-listed company, after-tax returns to equity investors will largely be repatriated offshore. The government revenue figure of approximately $1.8 billion cited in Santana's economic report includes corporate	Economics	**Response Evidence:** Evidence of Benje Patterson	GNP estimates which account for foreign ownership and non-NZ resident employment are $230m pa, out of direct economic activity of $360m in GDP terms.

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
	taxes, royalties, and PAYE — but the retained earnings flowing to Australian and institutional shareholders are not regional income.			
33	This creates a fundamental time horizon mismatch: > Mining benefits: concentrated over two decades. > Wine region value: built and realised over generations with many more to come. Jasper Morris MW observes that "the 40-year history [of Central Otago wine] should be seen as the first 40 years of potentially a very long run." The beneficiaries of that run are local, and the profits stay in the region.	Economics	**Response Evidence:** Evidence of Benje Patterson	The NPV of the BOGP GDP effects are $3.1 billion. The BOGP is estimated to generate $360m pa of GDP, while viticulture in the immediate vicinity of the mine site generates $10m pa of GDP.
34	The Panel is therefore required to consider not only the scale of potential benefits, but their duration, reversibility, and compatibility with an existing economic system that depends on long-term environmental integrity and consistent land use.	Legal – Lane Neave	**Response Evidence:** Legal Submissions dated 17 April 2026 'Closure and Post Closure'	Parameters for decision making under FTA are described in legal submissions.
35	The Panel should also note that Santana's Mine Closure Plan is, by design, a living document to be updated every three years throughout the mine's life. Core decisions about post-closure environmental management — the very decisions that will determine whether soil and water contamination is ultimately managed — have not yet been made. The Panel is being asked to approve a project of 31+ years total operational life whose most consequential environmental management decisions remain deferred. That level of uncertainty is difficult to reconcile with the irreversible effects on the landscape and the wine industry that the evidence before the Panel describes.	Legal – Lane Neave	**Response Evidence:** Legal Submissions dated 17 April 2026 'Closure and Post Closure'	Any amendments to the MCP will be guided by on-the-ground observations and stakeholder feedback, ensuring that the MCP remains a practical, real-world document that is effective in practice.

Comments from Parliamentary Commissioner for the Environment

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1.	PCE has commissioned research on how key mining risks, in particular AMD and tailings failures, are managed in other jurisdictions. This work will be published in due course, for the time being high level insights are: > Regulators abroad have learned from experience.	Geotechnical Ecotoxicology Environmental Geochemistry / Water	**Substantive FTA Application:** B.06 MWM MIW Overview Report documents how AMD will be managed in alignment with key international guidance documents.	MWM - The management of AMD in the BOGP application addresses key international guidance documents including:

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
	> Overseas jurisdictions generally have strong links to technical standards and best-practice guidelines embedded in their mining regulations and approvals. > Regulators abroad are better equipped to assess and manage the environmental risks associated with mining than New Zealand's councils.	Legal Mine Closure		

STANDARD/GUIDELINE	RELEVANCE
AMIRA, 2002	Acid Rock Drainage (ARD) test handbook.
CMER, 2018	Centre for Mineral Environmental Research – New Zealand (Cavanagh et al., 2018).
DFAT, 2016	Australasian leading practice sustainable development program for the mining industry - preventing acid and metalliferous drainage.
ICMM, 2019	Integrated mine closure, good practice guide.
INAP, 2014	Global Acid Rock Drainage Guide (GARD Guide) – created by the International Network for Acid Prevention
INAP, 2020	Rock placement strategies to enhance operational and closure performance of mine rock stockpiles.
INAP, 2024	ARD/AMD source control for mine rock stockpiles.
MEND, 2009	Prediction manual for drainage chemistry from sulfidic geologic materials.

The following comments are provided:

> New Zealand has its own mining environmental guidance funded by the Ministry for Business Innovation and the Employment (CMER, 2018).

> All competent AMD practitioners in New Zealand adhere to the international guidance set by AMIRA (2002); DFAT (2016); INAP (2014, 2020, 2024) and MEND (2009). These guidelines have been used for many years in New Zealand. These guidelines were applied to BOGP

> Dr Paul Weber was an author of AMIRA (2002) handbook; was a contributor to the CMER (2018) guidance documents; contributed a case study to DFAT (2016) leading practice handbook on AMD; and provided many case studies of Engineered Landforms for the INAP (2020) report. Such knowledge is embodied in the MGL application.

> We note that the environmental geochemistry work undertaken contributes to the studies needed by the Global Industry Standard for Tailings Management (GISTM) (ICMM, 2020) – Requirement 2.2.

> Noting: Many regulators are reliant on expert advice from subject matter experts for mining projects within New Zealand and internationally.

2.	New Zealand is a relatively immature mining destination. The risks of AMD and tailings failures are present in New Zealand and, given our seismic risk, are arguably greater than elsewhere. Without access to appropriately experienced and qualified regulatory officials within the New Zealand Government, recommends that the Panel commission its own experts to independently assess the risks of the proposal and to design appropriate conditions, including those pertaining to financial security.	Geotechnical Environmental Geochemistry / Water Bonding Legal Mine Closure Planning	N/A	MWM: There are technical experts providing review of the FTAA application that have experience with AMD: > The panel includes experienced mining professionals (e.g., Mr Tim Mulliner of GHD; Doug Johnson of Tonkin and Taylor); and > The invited parties have used experienced geochemists to provide advice and review technical reports (e.g., Professor Jenny Webster-Brown; Professor Bernd Lottermoser). MGL has proposed consent conditions that require the establishment of appropriate financial assurance facilities (bonds) to cover the costs of closing the operation and

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
				maintaining the closed site. New Zealand's applicable bond-setting regulations, the RMA, and the related process are not immature having been applied across the country for 27 years.
3.	Reasonable to assume that the economic benefits will exceed environmental costs but only if everything goes to plan.	Legal Economics	**Substantive FTA Application:** B.01 Benje Patterson (People and Places) – Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025) **Response Evidence:** Evidence of Benje Patterson	MGL has proposed consent conditions that require effects to be appropriately managed. The bond, as required under legislation, will provide for sufficient funding for establishing and maintaining all environmental and offset programmes for the period required under conditions of consent.
4.	Emphasises the importance of condition drafting.	Planning	N/A	MGL has reviewed this comment, however, it does not include any specific assessment or evidence on which to provide a considered response.
5.	While the project will generate a range of potential environmental issues, my comments relate solely to water quality and the risks posed to it by contaminants derived from waste rock stacks, tailings storage, and mining disturbance more generally. These impacts are the most (potentially) harmful. They also pose the greatest challenges to the drafting of any conditions.	Planning Legal	**Substantive FTA Application:** D.04 - Schedule Two - General Conditions for ORC Consents (17 April 2026)	MGL has reviewed this comment and notes that it raises several concerns regarding potential adverse effects of the BOGP, and how they are addressed in conditions. While MGL recognises that these concerns are genuinely held, this comment does not provide a specific alternative condition or amendments and as such, we have not considered this matter further. MGL considers the proposed conditions and associated management plans are robust and enforceable and will adequately protect the receiving environment, including through the setting of strict water quality compliance limits that must be adhered to in order to protect water quality.
6.	If the Panel does not receive submissions on dust, water supply, biota and uplift of the covenant it should seek independent advice on them.	Legal	**Response Evidence:** Legal Submissions dated 17 April 2026 at 'Adequacy of Information'	Application was accepted as complete with sufficient information under s46 FTA by Environmental Protection Authority. Panel can request further information if they choose.
7.	The Panel must clearly establish its expectation on the level of risk it considers to be acceptable and how that risk is apportioned. This is required before considering conditions. Determining what is no "more onerous than necessary" for conditions requires the Panel to be clear about why a condition is being set in the first place – in this case, to reduce risk to whatever level the Panel deems to be acceptable. Where conditions are insufficient to address the reasons for them being set, and adverse impacts will prevail, the Panel should decline the approvals sought.	Legal	**Response Evidence:** Legal Submissions dated 17 April 2026 at 'Fast Track Approvals Act 2024 Overall Legal Framework'.	The discretion to decline approvals under the FTA is limited.
8.	Raises concerns with the TSF. States that technical report comments combined with past experience at Macraes Mine suggest there is a risk	Geotechnical (TSF)	**Response Evidence:**	HGG: The hydrogeological setting is fundamentally different to Macraes and is much more favourable to high levels of seepage collection (refer to the BOGP MWSF

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	of tailings seepage into groundwater systems downstream of the project. Encourages the Panel to explore efficacy of the leachate collection systems and the toxicity of the leachate itself. More generally, the Panel should consider whether more needs to be done to reduce tailings-related risks. Long term risks must be assessed and a plan must be implemented to manage these including after mine closure.	Hydrogeology	Statement of Evidence of Ryan Burgess Paragraphs 10-11 in Evidence of Dr Trevor Matuschka	Seepage Risk Assessment (HGG, 2026). Coupled with the proposed primary seepage collection systems proposed, performance monitoring and contingency options available, in my opinion the residual risk of offsite seepage migration is low. TM: There are several features that restrict seepage. They include containment by naturally high groundwater levels around the TSF except in the downstream direction, design features (low permeability zone on upstream face of the dam, cutoff to bedrock, grouting of rock defects, chimney drain behind low permeability zone, underdrains to collect seepage, seepage collection pipes to a seepage collection sump), operational features (discharge and management of tailings from dam so that pond water is not in direct contact with dam and abutments). Seepage will be collected and treated. Performance monitoring will be undertaken to monitor surface and ground water quality downstream of the TSF and ELF. If monitoring indicates a change in water quality, there are contingency measures that can be implemented. This includes grout curtains, seepage cutoff wall, seepage interception drains, or seepage recovery wells. The residual risk to the Ardgour and Lindis Aquifer is low because seepage is constrained in a narrow valley so that the implementation of seepage recovery measures is relatively straight forward.
9.	It is vital that monitoring begins prior to construction in order to provide a credible baseline against which to compare any subsequent changes. The idea that Central Otago's soils and water contain naturally high levels of elements like arsenic has received a lot of attention in the media. Establishing a credible pre-mining environmental baseline offers a straightforward way to resolve this debate.	Environmental Geochemistry / Water Ecotoxicology Contamination	**Substantive FTA Application:** Comprehensive groundwater and surface water monitoring are documented in the Baseline Water Quality Monitoring Report in B.06 Mine Waste Management Limited - Mine Impacted Water Overview Report (MWM 2025) B.32 Geocontam Risk Management - Preliminary Site Investigation (GRM 2025) Baseline soil mapping of arsenic documented in Map C.17 Arsenic-rich soils.	MWM: Baseline water quality monitoring has commenced at both surface monitoring locations (n = 11) and groundwater monitoring locations (n = 5) with data available from 2022 for select sites. GRM: Baseline soil mapping of arsenic has been undertaken by MGL for the Rise and Shine Creek Valley utilising portable X-ray Fluorescence. This is presented in the: > B.32 Geocontam Risk Management - Preliminary Site Investigation (GRM 2025); and > G.20 Soil Management Plan. Identified data gaps will be addressed prior to commencement of the operations Limited soil sampling (n = 4) completed within the Bendigo Vineyards area by WWLA for the Central Otago Winegrowers Association. It is proposed that a baseline soil study will be completed and be incorporated into the Soil Management Plan.
10.	Given the sensitivity surrounding this project, there is merit in considering whether ongoing monitoring should be undertaken by independent third parties rather than MGL. Regardless, monitoring results should be made publicly available.	Legal Planning	**Substantive FTA Application:** G.01 Water Management Plan	The G.01 Water Management Plan indicates that the reporting of results, as part of the annual reporting, will be done by a Suitably Qualified and Experienced Person ("**SQEP**"). If the samples are going to be collected by an independent third party, then the report should be prepared by a third party SQEP also. In our view, this would not be the typical industry approach.

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11.	The Panel should be absolutely clear about who would bear the cost if something were to fail. MGL, not the public, should be held financially responsible (cites Stockton as an example of where this has not been the case). Currently unclear if the rehabilitation bond extends to low probability, high consequence events like tailings dam failure. Relying on tort law to establish legal liability is also problematic, particularly if there is a possibility that the magnitude of any damages could render MGL insolvent. Notes that approvals recently granted for OceanaGold's Waihi North Project include conditions relating to insurance.	Bonding Planning Legal	N/A	Stockton was owned and operated by a state-owned enterprise (Solid Energy (New Zealand) Limited) hence the Government's involvement in that site. We note the AMD liability at Stockton is also a crown liability. As a commercial entity, MGL's proposed draft conditions require it to establish and maintain of an appropriately quantified bond sufficient to cover the cost of closure, aftercare and long-term maintenance. The bond will provide for payment of insurance premiums and will include a risk cost component to cover remediation of risk events that could occur.
12.	In their current form, many of the closure objectives and associated criteria in the Mine Closure Plan and proposed draft conditions do not meet the SMART standard. Mine Closure Plan objectives and associated criteria are too ambiguous.	Mine Closure Planning Legal	**Substantive FTA Application:** B.40 Mine Closure Management – Mine Closure Plan (MCM 2025) – Section 8	MGL has prepared a Mine Closure Plan in good faith, despite the absence of NZ guidance outlining MCP requirements, in their acknowledgment of the importance of planning for the end outcomes and managing closure risks as early as possible. As the Mine Closure Plan indicates, the completion criteria have been developed based on current knowledge and it is acknowledged that these are considered preliminary at this stage of development, while baseline and impact studies were still in process at the time of MCP development. Completion criteria, like closure outcomes, will continue to be refined during the planning and operational phases of mining, based on new information, changes to stakeholder expectations, evolving industry standards and changes in risk profiles. Over time these criteria will continue to be refined and progress to detailed SMART criteria and final criteria will be agreed prior to closure implementation.
13.	The Panel needs to determine whether currently proposed water quality limits are appropriate. The Panel could adopt the MGL's proposed limits and effectively authorise a level of harm above and beyond the pre-mining baseline or decide that any degradation of surface or ground water quality is unacceptable, and that post-mining water quality should reflect the pre-mining baseline. While that may sound overly stringent, it is consistent with existing practice in at least some other jurisdictions.	Ecotoxicology – Greg Ryder	**Response Evidence:** Evidence of Greg Ryder	The proposed water quality limits are appropriate for the aquatic communities currently supported in Rise and Shine Creek and Shepherds Creek. Only invertebrate communities are present, which range from good to poor in Shepherds Creek and good to fair in Rise and Shine Creek, depending on location. No threatened or endangered species are present, and the benthic communities have relatively low diversity and are commonly found throughout most of NZ. Stream habitat is physically degraded in many reaches.
14.	In relation to the need for closure objectives to be flexible, the closure outcomes themselves should not be subject to negotiation after approvals are granted.	Mine Closure Rehabilitation	**Substantive FTA Application:** B.40 Mine Closure Management – Mine Closure Plan (MCM 2025 G.07A Landscape and Ecological Rehabilitation Management Plan	Closure outcomes are developed in direct correlation to the determined post-mining land use ("**PMLU**") after mining ceases i.e. what must be achieved to enable the PMLU. The Landscape and Ecological Rehabilitation Plan ("**LERMP**") which provides the framework for rehabilitation activities and the transition to a post-mining land use of predominantly ecological conservation, with a return to pastoral sheep grazing land limited to that required to support ecological values (particularly cushionfield areas). Should the PMLU be refined during the life of the project with additional or alternative PMLU's identified (which is considered unlikely at this stage), this may necessitate revision of the closure outcomes to align with a revised PMLU.

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
				The existing closure outcomes proposed are considered the fundamental to successful closure and would only be amended in agreement with stakeholders.
15.	In relation to the size of the bond, rehabilitation bonds have been routinely underestimated historically. The idea that closure cost estimates are commercially sensitive information requires close scrutiny.	Bonding Legal	**Response Evidence:** Evidence of Malcolm Lane	The process that has operated in New Zealand for the past 27 years is that the Councils assess mine bond quantum's. Where those quanta are estimated by a mining company, they are reviewed for adequacy by the Councils prior to being accepted.
16.	For the terms on which the rehabilitation bond is returned, much depends on how the objectives and outcomes of the Mine Closure Plan are defined. International jurisdictions have adopted the concept of performance assessment periods.	Mine Closure Bonding Legal Planning	**Substantive FTA Application:** B.40 Mine Closure Management – Mine Closure Plan (MCM 2025) - Section 10 **Response Evidence**: Evidence of Malcolm Lane	There are 5 phases of monitoring relevant to closure: > Pre-operational monitoring (baseline), > Operational, > Pre-closure (same as operational but may be at additional locations or frequencies), > Closure (during implementation), and > Post closure. The data obtained during all of these phases informs assessment of whether closure outcomes and criteria have been satisfactorily achieved. Post-closure monitoring (the ultimate performance assessment phase) will continue until there is a demonstration that closure criteria have been met and that the site is able to be relinquished or parameters being monitored reach a steady state. At this stage monitoring costs have been included for an 11-year period post closure implementation. Post-closure management of the remnant mining facilities, e.g. the TSF, may continue beyond this term, potentially in perpetuity.
17.	Ultimately, there is a question as to who assumes stewardship of the site following mine closure. The arrangements relating to post-closure stewardship are not something that should be left to sort out later. Rather, conditions specifying who is responsible for post-closure monitoring and management of residual risk should be included in any approvals.	Mine Closure Planning Legal	**Substantive FTA Application:** B.40 Mine Closure Management – Mine Closure Plan (MCM 2025)	MGL will remain responsible for monitoring and maintenance of the site following mine closure, until it is demonstrated that closure outcomes have satisfactorily been achieved, and it is agreed that tenements can be relinquished.
18.	The risks of toxic pollution from hard rock mining can last decades to centuries after the mine has closed. There are both ongoing risks of gradual pollution as well as the risks of catastrophic failure if tailings facilities fail. This is something that is particularly relevant in a wet and seismically active place such as New Zealand. The Panel needs to be confident that any Shepherds Creek tailings facility will be resilient to future weather events.	Geotechnical (EGL) Environmental Chemistry / Water	**Substantive FTA Application:** G.01 Water Management Plan **Response Evidence:** Paragraphs 9, 21-30 Evidence of Dr Trevor Matuschka	MWM: Acid and metalliferous drainage ("**AMD**") effects can last for decades to centuries. MWM modelling indicates that active water treatment is required for ~50 years and that passive treatment will be required thereafter. EGL - The primary control for surface water on the TSF is allowing for an inflow design flood. The Water Management Plan states "During operations, the TSF will be a fully contained, no release facility with no dedicated spillway, with all supernatant

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				(decant) water managed onsite and contained within the mine circuit water." This refers to the management of water on the surface of the tailings which will not be released from the facility. Sufficient storage volume is allowed on the TSF to manage all operational situations plus a Probable Maximum Flood, plus 1 m freeboard for wave action. An allowance for climate change effect has been made in the detailed design inflow design flood and is based on the increases in high intensity rainfall estimates published by NIWA in their High Intensity Rainfall Database Version 4 for Climate Change Scenario Representative Concentration Pathway 8.5.
19.	The Panel needs to assure itself, with the assistance of independent verification, that what is proposed can mitigate the risks as far as reasonably practical for at least a century after closure. If the Panel cannot receive that assurance within the timeframes of the Fast-track approvals process, the Bendigo-Ophir Gold Project application should be declined.	Mine Closure Legal	**Substantive FTA Application:** B.40 Mine Closure Management – Mine Closure Plan (MCM 2025) – Section 13. **Response Evidence:** Evidence of Chantelle Dodge Legal Submissions, 17 April 2026 at 'Closure and Post Closure'	MGL has undertaken a comprehensive body of baseline investigations and technical assessments to determine the likely impacts associated with mine development and develop strategies and management plans to mitigate these impacts to the extent possible, noting that due to the nature of mining activities, it is not possible to eliminate all impacts. It is recognised that at this stage of planning that there will need to be an ongoing body of work throughout the life of mine to confirm impacts are as expected. There is a commitment to continue to refine the knowledge base which informs closure strategies, as outlined in the various technical reports and summarised in the Mine Closure Plan B.40 Section 13 (Table 16). Mine Closure Plan, consent conditions and the bond will ensure that rehabilitation and closure of the BOGP will occur under all circumstances.

Comments from The Chinamans Terrace Services Company Ltd

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1.	The microclimate and soil profile on Chinaman's terrace provides unique growing conditions for ultra-premium wine production, in particular pinot noir. We are very concerned that mining activity is not compatible with ultra-premium winegrowing.	Legal	**Response Evidence:** Legal Submissions, 17 April 2026 at 'Evidence Based Decision Making'	MGL's experts provide assurances that the perceived risks raised by the commenters are unlikely to arise and should not be given weight by the Panel.
2.	While the Conservation Covenant was meant to protect the land from mining in perpetuity, the Perriam family has now sold a part of this land to Santana pending a Fast Track approval, for NZ$55 million.	MGL	N/A	MGL has reviewed this comment and notes that it raises several concerns regarding potential adverse effects of the BOGP. While MGL recognises that these concerns are genuinely held, the submission does not include any specific assessment or evidence on which to provide a considered response. Accordingly, MGL considers there is no technical or evidential basis to comment further.
3.	Increasingly, tourist wine experiences involve visiting the area. In addition, there are several Air BnB operators (both on Chinamans terrace and the wider Tarras/Bendigo region) that rely heavily on our landscapes and regional wine tourism experiences.	Economic	**Response Evidence:** Evidence of Benje Patterson	An analysis of visitor accommodation available on booking platforms in areas adjoining the mine highlights that there are three visitor accommodation options (Bendigo Ridge, Ardgour Strawbale B&B, and Chinamens Ridge holiday house) which collectively offer 5 bookable spaces. Given typical occupancy rates and guests per booking in the sector you would expect these accommodation options in areas adjoining the mine to total less than 2,000 guest nights per year by visitors. By comparison there are 3.8 million commercial guest nights in the Wakatipu Basin each year alone in the Destination Queenstown area. There are another 15,500 estimated day visitors in the vicinity of the mine, taking total visitor days to 17,500 a year. MBIE's International Visitor Survey for the 2025 year showed about 20% of visitors will go to a vineyard at least once during their holiday, which would mean that potentially around 3,500 of the 17,500 visitors to the areas adjoining the mine would be interested in wine tourism in the area.
4.	As the NPS-HPL does not cover land suitable for viticulture and as CODC has not completed Rural Landscape Classification mapping, there is no formal protection for often relatively small parcels of land optimally suited for ultra-premium wine production.	Legal	**Response Evidence:** Legal Submissions, 17 April 2026 at Appendix 3	The policy framework in the NPS-HPL governing the protection of HPL is is not applicable to the Panel's consideration of the BOGP as the Project Site does not contain highly productive land.
5.	Bendigo wine growers some years ago started a process to have the Bendigo sub-region as a separate "Geographical Indication". With the initiation of the project and its likely impact on our sub-regional brand, this process was put on hold for the time being.	MGL	N/A	MGL has reviewed this comment and notes that it raises several concerns regarding potential adverse effects of the BOGP. While MGL recognises that these concerns are genuinely held, the submission does not include any specific assessment or evidence on which to provide a considered response. Accordingly, MGL considers there is no technical or evidential basis to comment further.
6.	*Row intentially left black.*			

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
7.	Santana seeks a 35 or so year water take permit while our permit only allows for 6 or so years. If and when high quality Bendigo water becomes scarce we ought to have precedence over this resource as having made application for and relied on this water before the mine.	Legal	**Response Evidence:** Legal Submissions, 17 April 2026 at 'Duration of Water Permits'	It is appropriate to grant a 35-year permit due to the scale of the project, the investment required and the certainty of providing for critical infrastructure necessary for the project. There is no effects management reason that the water permit should be limited to six years and there will be no significant adverse effect on any other water user.
8.	We are concerned about any impact that mine polluted waters may cause on the Rise and Shine creek. Mine polluted waters may end up polluting not only Ardgour aquifer derived waters via the Shepherds creek but also Bendigo aquifer derived waters via the Rise and Shine creek. We are concerned about reports that as these streams are largely ephemeral, the polluting effects will be minimal. This does not take into account effects that may occur in large rainfall events that create a flush out of possibly polluted land and waters upstream that will find their way down in such events. We note that several structures will remain there in perpetuity, and any likely polluting effects must be considered in this perpetual context.	Environmental Chemistry / Water Groundwater	**Substantive FTA Application:** B.07 Greg Ryder Consulting - Recommended Water Quality Compliance Limits for the Bendigo Ophir Gold Project (Ryder 2025) G.01 Water Management Plan B.03 Kōmanawa Solutions Limited - Groundwater Existing Environment and Effects Assessment (Kōmanawa 2025b). **Response Evidence:** Evidence by Jens Rekker	Generally, surface waters from Rise and Shine Creek and Shepherds Creek and the associated dissolved solute load report to groundwater, although higher flow events can connect to the Lindis River. Entrained solids in these streams would settle on the riverbed. Kōmanawa (Groundwater) - The groundwater flow paths from the infiltration point of Bendigo Creek into the Bendigo Aquifer diverge substantially from the position of the CTSCL bore at the Bendigo Station Woolshed. the CTSCL bore position is flanked by schist bedrock to the south and east. The bore probably is placed to exploit a 24-metre-deep pocket of glacial outwash between the schist bedrock and the Clutha River / Mata Au lying to the west. The Clutha River is assessed to be substantially more influential on the water quality obtained from the CTSCL bore at the Bendigo Station homestead and woolshed. Greg Ryder (Ecotoxicology) - Water quality limits for SC01 and RS03 have been proposed to prevent impacts to the receiving surface and groundwaters (Ryder, 2025). The Water Management Plan sets out the monitoring process.
9.	We have seen visual reports of large dust plumes emanating from Macraes mine structures. We are highly concerned with MGL stating that dust will not impact areas beyond the mine works. Our concerns relate to dust with high arsenic contents finding its way into our own vineyards, but more particularly to the negative reputational impact to the Bendigo wine growing area of any visible dust plumes being generated from the mine site.	Air Quality	**Response Evidence:** B.33 Bendigo Ophir Gold Project Assessment of Environmental Effects from the Discharge of Contaminants into Air (PDP, 2025)	The assessment of potential amenity effects resulting from the discharge of dust found that for both the northern and southern zones any adverse effect would likely be less than minor; and, any adverse health impacts from the particulate matter (PM10, RCS and As) discharged from the proposed mine will be negligible and certainly less than minor. With regular monitoring and simple mitigation measures, dust discharged from dry beaches on the edge of TSF will be minimised and not cause any offensive or objectional effects to occur beyond the site boundary. This specific TSF risk will only occur during the active mining phase of the project when it can be addressed. The risk is eliminated after the TSF has been rehabilitated.
10.	Bendigo currently has extremely low baseline levels of noise and light pollution, and while effects may be within rurally permitted levels we are concerned that these impacts will significantly affect our daily amenity values.	Noise - Marshall Day Acoustics Landscape and Visual Amenity Lighting	**Substantive FTA Application:** B.29 Marshall Day Acoustics - Assessment of Noise and Vibration Effects (Marshall Day 2025) B.31 Cosgroves Limited - Exterior Lighting Report (Cosgroves 2025)	Cosgroves (Lighting) - It is accepted and acknowledged that there are potential adverse effects from exterior lighting being installed. The proposed mitigation measures for exterior lighting as outlined in the Cosgroves Exterior Lighting Report – and the acceptance of further proposed conditions recommended by Central Otago District Council (including the preparation of a Lighting Management Plan) will help to minimise the adverse effects compared to what would be observed from a typical mining operation. Refer to the amended conditions provided in Part 4 of this Comment Response Package. Marshall Day (Noise) - As discussed above and in the Noise Report, noise levels from BOGP operations in the vicinity of Bendigo Loop Road will be very low (less than 30 dB LA10) during both the construction and operational phases of the project. As such, there will be negligible effect on noise amenity at this location.

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11.	Seeks that MGL commits to a condition that Bendigo Loop Road is not used for mine related traffic when the Bendigo Loop Road base camp is moved to the Ardgour valley location.	MGL	**Response Evidence:** Evidence of Andrew Metherell	It is intended that Bendigo Loop Road and Matilda Rise Road will only be used by exception and is to be included as a specifically mentioned route restriction in the Project Traffic Management Plan ("**PTMP**").
12.	Major concern is the impact that an operational disaster or long term deleterious environmental impact will have on the brand reputation of Bendigo as a premier wine brand and tourism experience. Likewise, a long term gradual pollution of groundwaters or regular dust plumes emanating from the mine site will erode the brand image of Bendigo as a 100% Pure experience both of our wine brands as well as the tourism experience. Whilst the exact monetary impact of such effects is hard to quantify, the impacts on our existing industry would be undeniable.	Economics Environmental Chemistry Geotechnical (EGL)	**Substantive FTA Application:** B.07 Greg Ryder Consulting - Recommended Water Quality Compliance Limits for the Bendigo Ophir Gold Project (Ryder 2025) G.01 Water Management Plan **Response Evidence:** Further details on post closure changes in PCOC load are provided in the evidence of Dr Paul Weber (Appendix F) Evidence of Dr Trevor Matuschka – Paragraph 9	MWM - There will be an increase in Potential Constituents of Concern ("**PCOC**") in the post closure phases once water is discharged, although these waters will meet the agreed water quality limits for the BOGP. Data indicates the estimated SO4 concentration increase is: > 0.03 mg/Lin the Clutha River. > 1.7 mg/L in the Lindis River. Noting these data are for median flow as context and do not consider the effect during drier periods (e.g., mean annual low flow periods). Greg Ryder (Ecotoxicology) - Water quality limits for SC01 and RS03 have been proposed to prevent impacts to the receiving surface and groundwaters (Ryder, 2025). The Water Management Plan sets out the monitoring process. EGL - I (Trevor Matuschka) have been involved in the design, construction, and operation of many TSFs in New Zealand, Australia, Asia-Pacific, South America, and Africa. They include valley and paddock styles, different types of tailings dams (downstream, centreline, and upstream constructed from natural soils, waste rock, and tailings (including filtered tailings), and different geological, seismological and meteorological conditions. The proposed tailings dam at Bendigo would be close to having the lowest likelihood of breach of all those that I have been involved with. This is because it is of downstream construction and is buttressed by the Shepherds Engineered Landform (ELF) from very early on its operation. The final ELF extends approximately 1.1 km downstream of the crest of the tailings dam and is higher than the TSF (up to 70 m higher). With a buttress this large there are no credible modes of failure, including extreme seismic or flood events, that could lead to a mass release of tailings.
13.	The project will set in motion additional exploration in the wider Bendigo area. Santana recently made enquiries to DOC to commence an application for an exploratory mine licence in the Bendigo Historic Reserve. An approval of this mine must take into account any spill over effects on applications and more likely approvals of subsequent mines in Bendigo and Central Otago.	MGL Legal	N/A	The outcome of any future applications would be dependent on the assessment before the decision maker at that time and measured against the relevant assessment criteria. At this point in time, the Crown Minerals Act 1991 enables exploration and mining on Crown land including reserves, except that land under Schedule 4 which includes National Parks. Therefore, the Panel should not consider this comment in relation to this application.

Comments from Trevor and Sheryl Crook

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	**Tailings Dam Hazards**: The proposed dam would store 18 million cubic meters of toxic mining waste behind a waste-rock wall taller than Clyde Dam, with a historical global failure rate of over 1 %-far higher than conventional dams-potentially devastating tourism and agriculture worth $1.9 billion if it fails.	Geotechnical (EGL) Planning	**Substantive FTA Application:** B.21 Engineering Geology Limited - Shepherds Tailings Storage Facility Technical Report (EGL 2025b) G.16 Tailings Management Plan **Response Evidence:** Paragraph 9 in Evidence of Dr Trevor Matuschka	The BOGP has been designed with natural hazards front of mind. There are no active faults within the Project Site, and MGL's independent geotechnical experts consider the design of the TSF will safely contain tailings when subject to potential extreme earthquakes and be designed to withstand a 1 in 10,000-year earthquake, including aftershocks. In addition, by locating the tailings behind the downstream rockfill embankment, which are also buttressed by the large volume of rockfill placed in the Shepherds ELF, this will remove potential failure modes which could result in the release of tailings. Ongoing performance monitoring of the TSF will also be undertaken as part of the G.16 Tailings Management Plan. TM: I have been involved in the design, construction, and operation of many TSFs in New Zealand, Australia, Asia-Pacific, South America, and Africa. They include valley and paddock styles, different types of tailings dams (downstream, centreline, and upstream constructed from natural soils, waste rock, and tailings (including filtered tailings), and different geological, seismological and meteorological conditions. The proposed tailings dam at Bendigo would be close to having the lowest likelihood of breach of all those that I have been involved with. This is because it is of downstream construction and is buttressed by the Shepherds Engineered Landform (ELF) from very early on its operation. The final ELF extends approximately 1.1 km downstream of the crest of the tailings dam and is higher than the TSF (up to 70 m higher). With a buttress this large there are no credible modes of failure, including extreme seismic or flood events, that could lead to a mass release of tailings.
2	**Economic Imbalance**: 6. 75 billion in gold value mostly benefits the Australian company.	Economics Planning	**Substantive FTA Application:** B.01 Benje Patterson (People and Places) – Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025) **Response Evidence:** Evidence of Benje Patterson	Profits from the mine will also flow back to New Zealanders through a mix of wages, local contracts, taxes and royalties that help fund public services like healthcare, schools and infrastructure (to the combined total of several billion dollars).
3	**Environmental and Heritage Loss**: The open-cast operation would destroy biodiversity-protected and heritage land, with concerns over rushed consents limiting scrutiny.	Planning	N/A	MGL has reviewed this comment and notes that it raises several concerns regarding potential adverse effects of the BOGP. While MGL recognises that these concerns are genuinely held, the submission does not include any specific assessment or evidence on which to provide a considered response. Accordingly, MGL considers there is no technical or evidential basis to comment further.
4	**Community Action:** Groups aim to inform residents and counter pro-mine narratives claiming unanimous support, emphasizing intergenerational impacts from irreversible decisions.	MGL Planning	N/A	MGL has reviewed this comment and notes that it raises several concerns regarding potential adverse effects of the BOGP. While MGL recognises that these concerns are genuinely held, the submission does not include any specific assessment or evidence on which to provide a considered response. Accordingly, MGL considers there is no technical or evidential basis to comment further.

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5	In some instances, tens of thousands of birds have been killed. Yet Santana doesn't cover this phenomenon in their fast-track application. The Bendigo Wildlife Reserve is just 10.5km away from the tailings dam, and his home to a significant population of birds. The Bendigo Conservation Area and Ardgour Conservation area are both close by. In fact, the Ardgour Conservation Area borders the tailings dam.	Terrestrial Ecology Planning	**Substantive FTA Application:** B.14 RMA Ecology – Avifauna Values Assessment (RMA Ecology 2025c) **Response Evidence:** Evidence of Jeroen Lurling	The Avifauna Management Plan sets out a range of measures to manage adverse effects on birds primarily through avoiding and minimising disturbance where possible and various mitigation measures, including limiting habitat loss to areas of low avifauna value, timing works to reduce disturbance during sensitive periods, managing human activity and noise, and implementing predator control to improve overall breeding success and survival of native birds. It is also noted that Central Otago District Council and Otago Regional Council, through their peer-reviewers (including E3 Scientific), broadly accept that avifauna values at the site have been adequately characterised and that overall effects on birds are likely to be low.