

Before an Expert Consenting Panel

Under the

Fast-track Approvals Act 2024

And

In the Matter of

an application for approvals by
Matakanui Gold Limited to establish,
operate, rehabilitate and ultimately
close an open pit and underground
gold mining operation known as the
Bendigo-Ophir Gold Project

**Memorandum of Counsel on behalf of
Matakanui Gold Limited – Request for
Information 14**

Dated: 29 September 2026

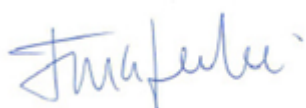
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MAY IT PLEASE THE EXPERT PANEL

1. This Memorandum of Counsel is filed on behalf of Matakanui Gold Limited (**Matakanui Gold**) in response to the Expert Panel's Request for Information 14 (**RFI 14**).
2. RFI 14 sought the raw data generated during all lizard surveys that have been undertaken to date within the Direct Disturbance Footprint, Ecological Study Area and beyond the Ecological Study Area.
3. This memorandum accompanies the following material responding to RFI 14:
 - (a) A memorandum prepared by Dr Ussher, appendices, raw data files and method analysis files.
 - (b) A memorandum prepared by Mr Barber and appendices.
4. The memoranda prepared by Dr Ussher and Mr Barber and Appendix B to Dr Ussher's memorandum have been provided unredacted for upload on the Fast-track Approvals Act 2024 (**FTA**) website.
5. Prior to lodgement of the substantive application, the Department of Conservation (**DOC**) requested that lizard data not be publicly disclosed where it could identify locations with greater precision than 1 kilometre. The appendices to the RFI 14 response memoranda have been provided in unredacted form to assist the Panel but in accordance with DOC's request cannot be publicly uploaded to the FTA website in that form.
6. If the Panel's preference is to upload the appendices to the FTA website, Counsel can provide redacted versions. However, given the nature of the information contained in the appendices, they would need to be redacted in their entirety, with the exception of Appendix B to Dr Ussher's memorandum.

Dated 29 September 2026



Joshua Leckie / Mia Turner
Counsel for Matakanui Gold Limited