
MINUTE 3 OF THE EXPERT PANEL
Invitations to comment
Bendigo-Ophir Gold Project
[FTAA-2507-1089]
[11 March 2026]

[1] This minute addresses invitations to comment on the application under section 53 of the Fast-track Approvals Act 2025 (the Act).

[2] The Expert Panel (Panel) records that it undertook a site visit on 4-5 March. The Panel confirms that it undertook its site visit prior to finalising the invitations to comment on this application.

[3] In accordance with section 53(2) of the Act, the Panel must invite comments from persons listed in sections 53(2) (a) to (n) of the Act. Sections 53(2)(d) to (g) and section 53(2)(n) do not apply to this application. The Panel considers the persons identified in Appendix 1 must be invited for comment.

[4] Section 53(2)(h) and (i) state that the owners and occupiers of the land adjacent to the land the application relates to must be invited to comment.

[5] After considering the information from the Applicant and the advice from the Environmental Protection Authority (EPA), and having now reviewed the application material, the Panel has determined that the owners and occupiers of land shaded orange on the Maps in Appendix 2 and listed in Appendix 3 should be invited to comment. In doing so the Panel records that “adjacent” land may include land that is not ‘contiguous’ and may extend to other land which is part of the context of the application. Likewise land contiguous to the title boundaries

within which the proposed development is to occur, may not, within the overall context of the application, reasonably be considered adjacent. The evaluative exercise which, the Panel has been obliged to undertake endeavours to satisfy the legislative prescription for a timely, efficient, consistent and cost-effective process while also satisfying what we consider to be the purpose of s53.

[6] The Panel has been particularly exercised to ensure that the owners or occupiers of properties with actual or potential takes (including private takes) from either the Bendigo aquifer or the Ardgor aquifer (the latter for a distance of approximately 1 kilometre upstream of the proposed activity) have an opportunity to comment on the application. That is because of the potential for ground water contamination and the importance and effectiveness of proposed mitigation measures. Contextually, the Panel regards these properties as “adjacent” to the land to which the application relates. Had the Panel not come to that conclusion it would have exercised its discretion under s53(3) of the Act to like effect. Under s53(3) the Panel also considers parties with consented takes from both aquifers (the Ardgor aquifer again limited to the 1 kilometre identified) should be invited to comment. There may be some duplication with those owner/occupiers captured under the extended definition of “adjacent” that we have adopted. We aim however to ensure that any other party with a consented take (eg pursuant to easement rights) have the opportunity to comment under s53.

[7] The Panel has considered section 53(3) and determined that it is appropriate to invite comments from the following parties. The Panel considers that below entities represent interests that may be directly or indirectly affected by the proposal, or otherwise holds a legitimate interest in environmental, economic, or community outcomes relevant to the Panel’s assessment under the Act. On that basis, the Panel has determined that an invitation to comment is appropriate under section 53(3).

- (a) Aurora Energy
- (b) Royal Forest and Bird Protection Society of New Zealand

- (c) Tourism Industry Aotearoa
- (d) New Zealand Minerals Council
- (e) Business South Inc
- (f) Queenstown Business Chamber of Commerce
- (g) Sustainable Tarras
- (h) Parliamentary Commissioner for the Environment
- (i) Environmental Defence Society
- (j) Otago Conservation Board
- (k) Santana Mine Supporters Group
- (l) Relevant groundwater and surface water consent holders
- (m) Central Otago Winegrowers Association

[8] The Panel notes that the EPA has received a number of unsolicited items of correspondence through multiple communication channels, both prior to and following the Panel's appointment. The Panel records the following three observations:

- (a) In the interests of balance, the Panel has determined that an invitation to comment should also be issued to the Santana Mine Supporters' Group. This group appears to be an unincorporated association comprising several thousand individuals, coordinated by Mr Bill Sanders. The Panel records that this invitation is not to be construed as an invitation for individual members of the group to comment; however, comments on behalf of the group are invited.
- (b) The Panel has identified that groundwater and surface water consent holders may lie within the potential influence of the proposed groundwater abstraction and should also be invited to comment. These are listed in **Appendix 4**.
- (c) Multiple vineyards have registered their interest and provided unsolicited correspondence. The Panel has determined that a single coordinated response should be provided through the Central Otago Winegrowers Association, and individual winegrowers who have

raised concerns are encouraged to direct their comments to the Association for coordination.

[9] As a general observation, the Panel records that it will be most assisted by evidence—including economic evidence—that can reasonably be expected to inform its assessment of adverse effects and whether such effects are disproportionate to regional or national benefits, taking into account the matters in section 85(3)(b)(i) and (ii) of the Act. Unsupported commentary, whether in support of or opposition to the application, will be of less assistance. The Panel encourages coordinated responses from individuals or groups with common interests. An example is the viticultural interest group from which comment has been invited. The Panel considers this approach consistent with the procedural principles in section 10 of the Act and likely to enhance the quality and usefulness of comments received.

[10] Section 54(1) of the Act requires that the Panel must specify in the invitation a date for when comments must be received by the EPA on behalf of the Panel (which must be 20 working days after the date on which the invitation is given under section 53).

[11] The date invitations to comments will be issued is **11 March 2026**. Comments must be made to the EPA:

[12] by email to bendigoftaa@fasttrack.govt.nz;

[13] by post to Private Bag 63002, Wellington 6140, New Zealand; or

[14] in person to Stewart Dawson's Corner, 366 Lambton Quay, Wellington 6011

[15] Comments must be received by **10 April 2026, 11.59PM**.

[16] The application may be accessed on the Fast-track website here: <https://www.fasttrack.govt.nz/projects/bendigophir-gold-project/substantive-application>

[17] Please note that the Panel received updated application material on 10 March 2026, following further correspondence and consultation undertaken by the applicant since lodging the application. This updated material is available at the website address noted above. Please ensure that you review and provide comment on the most up to date information.

[18] The Fast-track website has been updated as information is made available to the Panel.

A handwritten signature in blue ink, appearing to read "M. A. Muir". The signature is written in a cursive style with a large initial "M" and a trailing flourish.

Hon Matthew Muir KC

Bendigo-Ophir Gold Project Expert Panel Chair

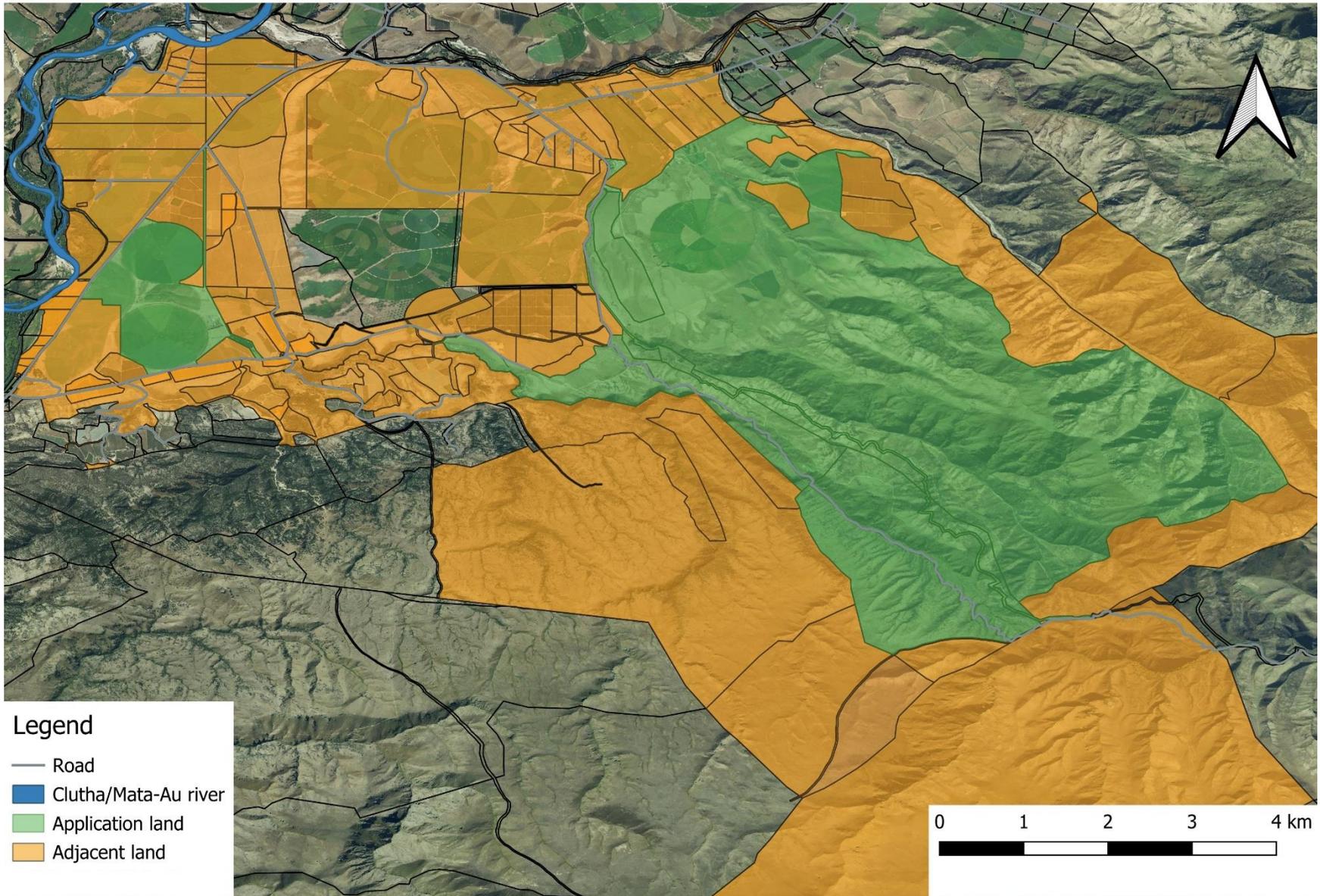
Appendix 1

Parties invited to comment under section 53(2) of the Act

Section of Act	Description from Act	Party identified
53(2)(a)	the relevant local authorities	Central Otago District Council Otago Regional Council
53(2)(b)	the relevant iwi authorities	Te Rūnanga o Ngāi Tahu
53(2)(c)	any relevant Treaty settlement entities, including, to avoid doubt,— (i) an entity that has an interest under a Treaty settlement within the area to which the substantive application relates; and (ii) an entity operating in a collective arrangement, provided for under a Treaty settlement, that relates to that area	Te Rūnanga o Ngāi Tahu Te Rūnanga o Waihao Te Rūnanga o Moeraki Kāti Huirapa Rūnaka ki Puketeraki Te Rūnanga o Ōtākou Hokonui Rūnanga Waihōpai Rūnaka Te Rūnanga o Awarua Te Rūnanga o Ōraka-Aparima
53(2)(h)	owners of the land to which the substantive application relates (Owners of land adjacent to that land are covered in Table 2 as the panel must exercise judgement on what is considered adjacent)	See Map 1 for land to which the substantive application relates. List of all owners set out in Appendix 1.
53(2)(i)	occupiers of the land to which the substantive application relates unless, after reasonable inquiry, an occupier cannot be identified (Occupiers of land adjacent to that land unless, after reasonable inquiry, an occupier cannot be identified are covered in Table 2 as the panel must exercise judgement on what is considered adjacent)	See Map 1 for land to which the substantive application relates. List of all owners set out in Appendix 1.
53(2)(j)	the Minister for the Environment and other relevant portfolio Ministers	Minister for the Environment Minister for Transport; and Minister for Infrastructure Minister for Arts, Culture and Heritage; and Minister for Economic Development Minister of Conservation; and Minister for Māori development; and Minister for Māori Crown Relations Minister for Land Information Minister for the South Island Minister for Regional Development; and Minister for Oceans and Fisheries; and Minister for Resources

		Minister for Economic Growth Minister for Climate Change Minister for Trade and Investment Minister for Tourism and Hospitality
53(2)(k)	relevant administering agencies	Ministry for the Environment Heritage New Zealand Pouhere Toanga Ministry for Culture and Heritage
53(2)(l)	any requiring authority that has a designation on land to which the substantive application relates or on land adjacent to that land	NZ Transport Agency Waka Kotahi
53(2)(m)	if the approvals sought in the substantive application include— (i) an approval described in section 42(4)(a) or (d) (resource consent or designation), the persons and groups listed in clause 13 of Schedule 5: (ii) an approval described in section 42(4)(e) (concession), the persons listed in clause 5 of Schedule 6: (iii) an approval described in section 42(4)(g) (conservation covenant), the persons listed in clause 44 of Schedule 6: (iv) an approval described in section 42(4)(h) (wildlife approval), the persons listed in clause 4 of Schedule 7: (v) an approval described in section 42(4)(k) (marine consent), the persons listed in clause 5 of Schedule 10: (vi) an approval described in section 42(4)(l) or (m) (access arrangement), the persons listed in clause 5 of Schedule 11 (vii) an approval described in section 42(4)(n) (mining permit), the person listed in clause 18 of Schedule 11.	Director-General of Conservation New Zealand Fish and Game Council New Zealand Game Animal Council New Zealand Conservation Otago Conservation Board
53(2)(n)	any persons or groups specified by the Minister under section 27(3)(b)(iii).	N/A

Appendix 2 - Map of adjacent and project land – section 53(2)(h) and (i)



Appendix 3

Owners and occupiers of the properties to which the substantive application relates and the land adjacent to that land

Owners and occupiers of the land to which the substantive application relates

Lot 11 DP 525588	Section 14 SO 24641
Section 18 SO 24641	Section 12 SO 24641
Lot 1 DP 525588	Section 16 SO 24641
Lot 2 DP 505064	Lot 6 DP 517385
Lot 3 DP 525588	Lot 5 DP 517385
Lot 6 DP 525588	Lot 6 DP 525495
Section 15 SO 24641	Section 27 SO 24641
Section 11 SO 24641	Section 13 SO 24641

Owners and occupiers of the adjacent land

RUN 238N	Section 5 SO 300797
Lot 1 DP 509332	Lot 14 DP 548903
Section 32 SO 24641	Section 20 SO 554095
Section 27 SO 24641	Section 15 SO 554095
Section 21 SO 24641	Section 10 SO 554095
Section 13 SO 24641	Section 5 SO 554095
Section 19 SO 24641	Lot 1 DP 475129
Lot 6 DP 450337	Lot 1 DP 308607
Lot 3 DP 525588	Lot 6 DP 301165
Lot 5 DP 525588	Lot 5 DP 301165
Lot 4 DP 525588	Lot 3 DP 301165
Lot 6 DP 525588	Lot 2 DP 304677
Section 23 Block XVI Tarras SD	Lot 1 DP 512390
Lot 2 DP 525588	Lot 2 DP 408812
Part Section 25 Block XVI Tarras SD	Lot 3 DP 579535
Part Section 31 Block XVI Tarras SD	Lot 5 DP 548903
Section 24 Block XVI Tarras SD	Lot 8 DP 548903

Lot 1 DP 505064	Lot 16 DP 548903
Lot 4 DP 300395	Section 4 SO 300797
Lot 2 DP 300805	Section 18 SO 554095
Section 1 SO 433933	Section 22 SO 554095
Lot 3 DP 316124	Section 1 SO 24604
Section 2 SO 433933	Section 4 SO 436969
Lot 100 DP 579535	Lot 1 DP 316124
Section 33 SO 24641	Lot 1 DP 449223
Lot 1 DP 300805	Section 3 SO 23858
Lot 3 DP 26517	Lot 2 DP 311382
Lot 2 DP 341174	Section 1 SO 23857
Lot 4 DP 26517	Lot 1 DP 391334
Lot 1 DP 341174	Lot 5 DP 391334
Lot 2 DP 589950	Lot 2 DP 496622
Lot 1 DP 589950	Lot 4 DP 391334
Lot 8 DP 300395	Lot 6 DP 525495
Section 4 Block III Tarras SD	Lot 3 DP 391334
Part Section 3 Block III Tarras SD	Lot 2 DP 391334
Lot 2 DP 568048	Lot 1 DP 525495
Lot 1 DP 362171	Lot 5 DP 525495
Lot 1 DP 568048	Lot 2 DP 525495
Part Section 32 Block II Wakefield SD	Lot 4 DP 525495
Part Section 33 Block II Wakefield SD	Section 21 SO 554095
Section 2 SO 23095	Lot 11 DP 548903
Section 1 SO 23095	Section 17 SO 554095
Lot 2 DP 548903	Section 16 SO 554095
Lot 7 DP 517385	Lot 17 DP 548903
Section 11 SO 554095	Lot 15 DP 548903
Section 1 SO 554095	Lot 1 DP 301165
Section 6 SO 554095	Lot 2 DP 523873
Lot 3 DP 525495	Lot 18 DP 324082
Section 14 SO 554095	Lot 1 DP 523873
Section 4 SO 554095	Lot 10 DP 324082
Section 9 SO 554095	Lot 2 DP 556391

Section 13 SO 554095	Lot 8 DP 391334
Section 8 SO 554095	Lot 7 DP 301165
Section 3 SO 554095	Lot 1 DP 341285
Section 2 SO 554095	Lot 2 DP 341285
Section 7 SO 554095	Lot 4 DP 301165
Section 12 SO 554095	Lot 2 DP 301165
Lot 4 DP 548903	Lot 2 DP 475129
Lot 7 DP 548903	Lot 1 DP 408810
Lot 13 DP 548903	Lot 1 DP 324753
Lot 10 DP 548903	Lot 1 DP 311382
Section 5 SO 24641	Lot 5 DP 362171
Section 4 Block II Wakefield SD	Lot 2 DP 512390
Lot 2 DP 449223	Section 13 Block III Tarras SD
Section 1 SO 401685	Lot 2 DP 362171
Section 1 SO 435480	Lot 4 DP 362171
Section 25 Block IX TN OF Bendigo	Part Section 38 Block II Wakefield SD
Lot 8 DP 517385	Section 2 SO 435480
Lot 3 DP 459561	Section 4 SO 23858
Section 19 SO 554095	Section 3 SO 435480
Lot 12 DP 510514	Part Lot 10 DP 391334
Lot 2 DP 300395	Lot 1 DP 18493
Lot 5 DP 338472	Lot 6 DP 300395
Lot 6 DP 338472	Section 45 Block XVI Tarras SD
Lot 4 DP 338472	Lot 1 DP 575309
Lot 7 DP 338472	Lot 2 DP 575309
Lot 8 DP 338472	Section 49 Block XVI Tarras SD
Lot 9 DP 338472	Part Section 1 SO 24921
Lot 10 DP 338472	Section 10 Block III Tarras SD
Lot 1 DP 338472	Section 31 Block III Tarras SD
Lot 2 DP 338472	Section 1636R Block III Tarras SD
Lot 3 DP 338472	Lot 2 DP 455645
Lot 11 DP 338472	Lot 2 DP 553125
Section 6 Block III Tarras SD	Section 11 Block III Tarras SD
Section 5 Block III Tarras SD	Lot 2 DP 576945

Lot 3 DP 576945	Lot 14 DP 338472
Lot 7 DP 300395	Lot 1 DP 576945
Crown Land Block III Tarras Survey District	Lot 1 DP 455645
Lot 1 DP 311352	Lot 1 DP 553125
Lot 2 DP 311352	

Appendix 4

Groundwater and Surface Water Consent Holders Located Near the Proposed Project Site.	
G41/0262	G41/0269
G41/0181	G41/0270
CB13/0221	G41/0097
G41/0230	G41/0203
G41/0435	G41/0203
In consent document G41/0403, on	G41/0214
maps G41/0402/1	G41/0228
G41/0271	G41/0198
G42/1552 and G42/1553	G41/0441
G41/0152	G41/0440
G41/0218	G41/0600
CB13/0225	G41/0387
G41/0283	F41/0410
G41/0229	G41/0191
G41/0206	G41/0282
G41/0225	CB13/0151
G41/0263	G41/0189
G41/0332	G41/0315
G41/0407	G41/0406
G41/0405	G41/0402/2
G41/0372	G41/0311
G41/0388	CB13/0125
G41/0308	G41/0347
G41/0488A	G41/0434
G41/0488	G41/0452
G41/0462	G41/0463

G41/0236	G41/0231
G41/2059	G41/0232
G41/2093	G41/0149
G41/0343	G41/0232
G42/1553	G41/0218
G41/0151	G41/0447
CB13/0170	G41/0249
G41/0382	G42/1552
G41/0322	G42/1587