

APPLICANT RESPONSES TO RELEVANT COMMENTS FROM RELEVANT CROWN MINISTERS AND GOVERNMENT OFFICIALS ON THE BENDIGO-OPHIR GOLD PROJECT

This document contains the key comments from the following parties:

- > Minister for the Environment;
- > Minister for Infrastructure;
- > Minister for Arts, Culture and Heritage;
- > Minister for Economic Growth;
- > Minister of Conservation;
- > Minister for Māori Development and Māori Crown Relations;
- > Minister for the South Island;
- > Minister for Regional Development; and
- > Minister for Resources.

Comments from the Minister for the Environment

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	Clarity and certainty of impacts on indigenous biodiversity A number of ecological investigations have been undertaken by the applicant. However, there are inconsistencies and errors across the application, including conflicting species counts, duplicated entries, and differing conclusions between summary tables and the body of the assessment and incorrect application of the effects management hierarchy. I note that the application signals continued uncertainty around the potential effects of the development on several points including the potential scale of adverse effects on significant indigenous vegetation and fauna, habitats of significant indigenous fauna and wetlands. This is particularly the case with respect to subalpine dryland vegetation (particularly cushionfields), lizard and invertebrate values. The application signals significant and permanent impacts that are not likely to be offset or compensated for.	Terrestrial Ecology	N/A	It is acknowledged that there are some inconsistencies and minor errors across the application, as would be expected for a project of this scale. However, none are material or alter the overall assessment of ecological effects or the stated outcomes derived from the effects management package. To that end we consider this statement unwarranted.
2	The applicant acknowledges that significant residual adverse effects on significant indigenous biodiversity are likely to remain unmitigated after the proposed offsetting and compensation have been applied. In the first instance, however, it could be useful to understand in more detail what options have been considered to avoid or minimise those effects and what other mechanisms could be applied to mitigate impacts and increase	Legal MGL	Substantive FTA Application: B.08 Alliance Ecology Consulting - Assessment of Ecological Effects (Alliance 2025) Response Evidence:	MGL proposes an adaptive management approach to residual effects through the proposed use of management plans. There is a high level of baseline information, such that MGL's experts could adequately assess the effects on the environment and thus recommend the most appropriate approach for avoiding or minimising effects. As such, further alternatives were not considered to be required. Where there are remaining residual effects, adaptive management will be used.

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	certainty. For example, has the feasibility of alternative extraction methods and management approaches been assessed and on what basis have they been discounted?		Legal Submissions, 17 April 2026 at 'Adaptive Management'	
3	The application is also proposing offsetting and compensation in situations that are inconsistent with good practice for those mechanisms including with respect to vulnerable, valuable and irreplaceable species and where there is a lack of information.	Terrestrial Ecology	Substantive FTA Application: B.08 Alliance Ecology Consulting - Assessment of Ecological Effects (Alliance 2025)	Instances where offsetting and compensation principles are not met are disclosed in B.08 Alliance Ecology Consulting - Assessment of Ecological Effects (Alliance 2025).
4	In some instances, the applicant is offering conditions requiring key research and management plans to be developed at a later date to manage adverse effects on significant indigenous biodiversity. However, whether the offsetting and compensation can achieve a net gain is material to the decision to grant the approval or not when the Panel comes to weigh the significance of the adverse impacts on the environment against the regional or national benefits of the proposal.	Legal	Response Evidence: Legal Submissions, 17 April 2026 at 'Adaptive Management', 'Management Plans'	MGL proposes an adaptive management approach through the proposed use of management plans. Panel certification of management plans (under FTA process) provides certainty to all parties that management plans meet required standards from outset.
5	there is a discrepancy in the application related to the term of the consent sought and lack of clarity on how this aligns with the duration of the consent conditions and the adverse impacts themselves. Ideally, the duration of any offsetting or compensation should be maintained after the mine is closed and preferably in perpetuity, particularly where they relate to permanent or irreversible losses.	Legal Planning	Substantive FTA Application: A.11 Section 4.2.2 – Approvals Sought – Section Response Evidence: Legal Submissions, 17 April 2026 at 'Duration of Water Permits', 'Role and Quantum of Bond'	The Panel is not required to adhere to the ORC six-year limit on duration of water take consents for the BOGP. Refer to Section 4.2.2 of the Substantive Application Report for further rationale and detail. The proposed bond, in its requirement to sufficiently cover the estimated costs in fulfilling the requirements of each management plan, will maintain the environmental gains made through the implementation of the offsetting and compensation package in perpetuity.
6	The mitigation for impacts on the last known population of the rare endemic moth <i>Sporophyla oenospora</i> may be insufficient as it relies on finding individuals on site during salvage operations. This approach is unlikely to mitigate impacts as it does not take account of the impacts of adjacent vehicle movements, dust, vibration, lighting and loss of habitat and landscape connections.	Terrestrial Ecology	Substantive FTA Application: B.08 Alliance Ecology Consulting - Assessment of Ecological Effects (Alliance 2025) - Pages 15, 74, 132. G.06 Terrestrial Invertebrate Management Plan – Pages 4, 6, 17- 18. Response Evidence: Evidence of Keith Barber – Paragraph 16(d)	Primary mitigation for <i>S. oenospora</i> is avoidance through design. The Ardgour Rise road alignment was adjusted to maintain a 250 m buffer around the only known population. Salvage is not a proposed management measure for this species. Captive breeding is proposed as a last chance measure for population not being affected by project. Indirect effects from dust and lighting were addressed at design stage. Lighting is managed through Terrestrial Invertebrate Management Plan ALAN protocols. Two additional measures are recommended: <ul style="list-style-type: none"> > Sealing the road surface for 300 m either side of the known population to reduce dust; and > Conditioning maximum light levels within 250 m of any known location to 0.3 lux.

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				The species' host plant, microhabitat requirements, and full distribution remain unknown, limiting residual effects characterisation. Given its Nationally Critical status, the Panel may wish to impose conditions providing greater certainty.
7	The application states incorrectly that provision for fish passage is not required. The National Policy Statement for Freshwater Management 2020 and the National Environmental Standards for Freshwater 2020 require any new in-stream structures to provide for fish passage unless specifically excluding pest species.	Planning	<p>Response Evidence:</p> <p>A.09 Section 2 – Existing Environment</p> <p>A.11 Section 4 – Approvals Sought</p> <p>A.15 Section 8 – Fast-track Approvals Act 2024 Requirements</p>	<p>MGL has applied for two complex freshwater fisheries approvals described in <i>A11 Section 4 – Approvals Sought</i>. In summary, MGL is seeking dispensation from the requirement to provide fish passage facilities for the proposed diversions approval to construct a culvert in the bed of Rise and Shine Creek that could technically impede fish passage.</p> <p>As there are no fish present in the watercourses associated with the BOGP there is no requirement to provide for fish passage.</p> <p>MGL note that the Department of Conservation Section 51 Report does not have any notable concerns with these proposed activities (i.e. no fish passage provided) due to the absence of fish demonstrated in impacted areas.</p>
8	The application does not address significant risks from natural hazards other than seismic hazards (e.g., land instability), or the effects of climate change. As a result, the Panel has limited visibility of how non-seismic natural hazards and climate change could affect environmental outcomes and public safety, including tailings storage facility performance under extreme weather and long-term post closure risks. This constrains a forward-looking, risk-based approach to managing natural hazards, particularly given the long consent term sought and the permanent nature of many project components.	Geotechnical Hydrogeology Mine Closure	<p>Substantive FTA Application:</p> <p>B.40 Mine Closure Management – Mine Closure Plan (MCM 2025) – Section 13</p> <p>Response Evidence:</p> <p>Evidence by Ryan Burgess</p> <p>Evidence of Dr Trevor Matuschka – Paragraphs 9, 22-30, 31-25</p>	<p>Mine Closure (MCM) - The Mine Closure Plan recognises that climate change can pose significant challenges for closure outcomes, and an understanding of potential changes in climatic patterns is required such that rehabilitation strategies can be adapted where required. The Mine Closure Plan Future Work outlines that MGL will develop 'an understanding of climate modelling, vegetation resilience, and extreme weather impacts to ensure closure rehabilitation techniques are appropriate and that outcomes are expected to remain effective under future climatic conditions'.</p> <p>Hydrogeology (HGG) - The Water and Load Balance Model (MWM, 2025) which estimates instream water quality as a result of the project includes representation of climate change.</p> <p>Geotechnical (EGL) – EGL (Dr Trevor Matuschka) has been involved in the design, construction, and operation of many Tailings Storage Facilities (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.</p> <p>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.</p> <p>The primary control for surface water on the TSF is allowing for an inflow design flood. Allowance for climate change effects on surface water has made in the assessment of detailed design inflow design flood, which is based on the increases in high</p>



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				<p>intensity rainfall estimates published by NIWA in their High Intensity Rainfall Database Version 4 for Climate Change Scenario Representative Concentration Pathway 8.5.</p> <p>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.</p>
9	The application does not address the financial arrangements for setting aside funds for remediation during the operational life of the project. Which financial instruments will guarantee that funds for remediation will be available when required?	Legal Bond	<p>Substantive FTA Application: B.44 Lane Associates Limited – Bond Introduction (Lane Associates 2025)</p> <p>Response Evidence: Legal Submissions, 17 April 2026 at 'Role and Quantum of Bond'</p>	<p>The BOGP bond will cover the following phases:</p> <ol style="list-style-type: none"> 1. The rehabilitation of site disturbance (which can occur during the operational phase of the mine) and closure; 2. A period of aftercare; and 3. The ongoing cost associated with offsetting and compensation

Comments from the Minister for Infrastructure

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1	Infrastructure is important for growth and prosperity. Our view is our planning system has not been enabling growth, hence the establishment of the FTAA. I wish to take this opportunity to express my broad support for projects which deliver positive outcomes for New Zealand, including the Bendigo-Ophir Gold Project. Please take this letter of support as a reflection of the Government's economic growth and infrastructure priorities.	N/A	<p>Substantive FTA Application: The following sections of Substantive Application Report: A.08 Section 1 – Introduction, A.09 Section 2 – Existing Environment A.13 Section 6 – Assessment of Environmental Effects B.01 - Benje Patterson (People and Places)- Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025).</p>	<p>MGL agrees and supports the comments made by the Minister of Infrastructure. In particular, the BOGP will:</p> <ul style="list-style-type: none"> > Generate a significant contribution to the GDP of Inland Otago and New Zealand; > Generate substantial revenue for the New Zealand Government; and > Generate substantial foreign investment, making it one of the largest funded projects in New Zealand's infrastructure pipeline.

Comments from the Minister for Arts, Culture and Heritage

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1	Confirming no comment from Hon Paul Goldsmith Minister of Arts, Culture and Heritage.	N/A	N/A	N/A

Comments from the Minister for Economic Growth

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	The Minister notes the project is expected to deliver substantial economic benefits, including an average of \$360 million in GDP per year and significant job creation over its 14-year life. The Minister highlights that the mine would bring major capital investment, high-value employment, and strong indirect economic impacts regionally and nationally.	Economics	<p>Substantive FTA Application:</p> <p>The following sections of Substantive Application Report:</p> <p>A.08 Section 1 – Introduction,</p> <p>A.09 Section 2 – Existing Environment</p> <p>A.13 Section 6 – Assessment of Environmental Effects</p> <p>B.01 - Benje Patterson (People and Places)- Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025).</p>	<p>MGL agrees and supports the comments made by the Minister of Economic Growth. In particular, the BOGP will:</p> <ul style="list-style-type: none"> > Generate a significant contribution to the GDP of Inland Otago and New Zealand; > Generate substantial revenue for the New Zealand Government; > Generate substantial foreign investment, making it one of the largest funded projects in New Zealand’s infrastructure pipeline; > Support a wide range of highly paid jobs, bringing with them job security, sustained livelihoods, reduced local unemployment, increased business activity, and indirect employment opportunities; and > Deliver significant contributions to the regional economy.
2	Another substantial economic benefit of this proposal is its potential contribution to exports, which aligns with the Government’s current economic growth plans of doubling exports by 2040.	Economics	<p>Substantive FTA Application:</p> <p>B.01 - Benje Patterson (People and Places)- Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025).</p>	<p>MGL agrees and supports the comments made by the Minister of Economic Growth. In particular, the BOGP will make an important contribution to meeting the New Zealand Government’s goal of doubling the value of New Zealand’s mineral exports to \$3 billion by 2035 (A Mineral Strategy for New Zealand, MBIE, January 2025).</p>

Comments from the Minister of Conservation

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1	The intent of the conservation covenant is primarily to protect and enhance biodiversity values together with protecting and maintaining the landscape and heritage values present.	N/A	N/A	MGL acknowledge comment – no matters to respond to.
2	The conservation covenant was granted in perpetuity and it is understood that the landowner was compensated by the Crown (as part of the agreed outcomes of tenure review) at the time the covenant was put in place.	N/A	N/A	MGL acknowledge comment – no matters to respond to.
3	Revoking or amending the covenant in a way that is contrary to the covenant’s objectives, particularly if no direct compensation/mitigation is offered by the applicant, could set a precedent and undermine confidence in the process used to set up such covenants, beyond the fast-track process.	Legal	Response Evidence: Legal Submissions, 17 April 2026 at ‘Partial Revocation of the Conservation Covenant’	Each FTA application to remove or amend a conservation covenant must be considered on its own merits, and decisions made under the FTA cannot be held as precedents under other legislation. A fresh merits assessment is necessary for each application.
4	Where covenants arise from tenure review (as is the case here), there is a public process to understand and address the way to protect conservation values. There is a risk that process could be seen as undermined, if changes that were contrary to the covenant’s objectives were approved without alternative protection or mitigation in place.	Legal	Response Evidence: Legal Submissions, 17 April 2026 at ‘Partial Revocation of the Conservation Covenant’	When considering whether or not to remove or amend a conservation covenant the Panel must give the greatest weight to the purpose of the FTA, and take into account the purpose of the covenant and the conservation values of the land concerned, and whether the amendment or revocation will compromise values of regional, national or international significance. These inputs in the Panel’s decision making are analysed in DOC’s report and the Application.
5	Any such changes should be undertaken through a robust legal process that ensures the decisionmaker is fully informed about the potential impacts. While acknowledging that a different legal test applies under the fast-track process, it is noted that, outside that process where decisions are made at a ministerial level consideration would ordinarily be given to: <ul style="list-style-type: none"> > the purpose of the covenant and the conservation values it is intended to preserve and protect through ongoing land management; and > whether the Minister is satisfied that the land should no longer be managed to preserve and protect those conservation values, taking into account the extent to which those values have already been maintained. 	Legal	Response Evidence: Legal Submissions, 17 April 2026 at ‘Partial Revocation of the Conservation Covenant’	The Conservation Act 1987 (Conservation Act) does not prescribe a specific test for the uplift of a conservation covenant; rather, removal outside of the FTA process is achieved by agreement, or by a court order applying the Property Act 2007 test for modifying or uplifting covenants. When considering whether or not to remove or amend a conservation covenant the Panel must give the greatest weight to the purpose of the FTA, and take into account the purpose of the covenant and the conservation values of the land concerned, and whether the amendment or revocation will compromise values of regional, national or international significance. These inputs in the Panel’s decision making are analysed in DOC’s report and the Application.
6	If changes to the covenant are to be made, it would be suitable for those changes to be considered in light of the geographic extent directly required for the project. It is understood the current proposal is to remove areas of land broader than the direct footprint of the project.	Legal	Response Evidence: Legal Submissions, 17 April 2026 at ‘Partial Revocation of the Conservation Covenant’	The Conservation Act 1987 (Conservation Act) does not prescribe a specific test for the uplift of a conservation covenant; rather, removal outside of the FTA process is achieved by agreement, or by a court order applying the Property Act 2007 test for modifying or uplifting covenants.

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				When considering whether or not to remove or amend a conservation covenant the Panel must give the greatest weight to the purpose of the FTA, and take into account the purpose of the covenant and the conservation values of the land concerned, and whether the amendment or revocation will compromise values of regional, national or international significance. These inputs in the Panel’s decision making are analysed in DOC’s report and the Application.
7	If the panel grants approval for the change, the panel is able to impose conditions (including for example, requiring protection of an equivalent area) and I expect the applicant will work with the Department on ways to ensure appropriate mitigation/compensation, and other conditions to address the impacts of such a change.	Legal Planning	Substantive FTA Application: D.03 - Schedule One - Central Otago District Council and Otago Regional Council Common Conditions D.01 - CODC Land Use Consent and Conditions Response Evidence: Legal Submissions, 17 April 2026 at ‘Partial Revocation of the Conservation Covenant’	The Central Otago District Council (CODC) land use conditions requiring covenanting of the proposed offsetting and compensation areas in perpetuity and exceeding the area to be removed from the existing Conservation Covenant, remove the need to impose conditions under Clause 46(1)(a). Refer to Condition 122 of the <i>D.01 - CODC Land Use Consent and Conditions</i> The proposed covenants require environmental outcomes and ensure the covenanter actively manages the land requiring including weed and post control, and planting.

Comments from the Minister for Māori Development and Māori Crown Relations

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	Supports the application subject to the Expert Panel: > Considering whether the proposed activities will affect Te Wairere (Lake Dunstan) or Mata-au (Clutha River), thereby bringing the statutory acknowledgements into play. > Considering the impact of the proposal on taonga species.	Planning Legal	Substantive FTA Application: A.09 Section 2 – Existing Environment – Refer to Sections 2.6.1 and 2.7 Response Evidence: Legal Submissions, 17 April 2026 at ‘Statutory Acknowledgement Areas’	As the BOGP project footprint is not located within either of the statutory acknowledgement areas identified above, we do not consider the obligations regarding statutory acknowledgement areas to be triggered in this case. While the tributaries that are located within the BOGP footprint indirectly feed into these statutory acknowledgement areas via the Bendigo Aquifer, they are explicitly removed from statutory acknowledgements in the Settlement Act. The Settlement Act’s definition of “river” specifically excludes “any tributary flowing into a river”. For lakes, the Settlement Act’s definition excludes “any river or watercourse, artificial or otherwise, draining into or out of that lake”.
2	Encourages the Expert Panel to: > Consider the Ngāi Tahu nohoanga entitlement in relation to potential effects on cultural values.	Legal	Response Evidence: Legal Submissions, 17 April 2026 at ‘Nohoaka Entitlements’, ‘Rakatirataka’	Nohoanga (or nohoaka) entitlements are clearly defined and identified in the Settlement Act. There are no nohoaka entitlement areas within the BOGP Project Site. Accordingly, the obligations under the Settlement Act relating to nohoaka entitlements do not apply to the BOGP.

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	> Give reasonable consideration to the comments provided, if any, by relevant Māori groups.			The Expert Panel need to consider the submission of Kā Rūnaka in the context of the relevant legal framework which includes both the FTA and the Settlement Act.

Comments from the Minister for the South Island and Associate Minister for Transport

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	Given the scale of projected economic benefits, including job creation and regional investment the project should deliver significant regional economic benefit.	MGL	<p>Substantive FTA Application:</p> <p>The following sections of Substantive Application Report:</p> <p>A.08 Section 1 – Introduction,</p> <p>A.09 Section 2 – Existing Environment</p> <p>A.13 Section 6 – Assessment of Environmental Effects</p> <p>B.01 - Benje Patterson (People and Places)- Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025).</p>	MGL agrees and supports the comments made by the Minister for Transport. In particular, the BOGP will deliver significant contributions to the regional economy.
2	The operational impacts of the project on the local transport network have not been assessed. However, it is noted that the applicant has worked closely with the New Zealand Transport Agency during the development of the substantive application, and it is encouraged that this engagement continues, as NZTA is well placed to advise on operational impacts and their management.	MGL	<p>Substantive FTA Application:</p> <p>The following sections of Substantive Application Report:</p> <p>A.12 Section 5 – Consultation</p> <p>B.30 - Stantec Integrated Transport Assessment (Stantec 2025)</p>	MGL agrees and supports the comments made by the Minister for Transport and MGL will continue to engage with NZTA Waka Kotahi to ensure planned upgrades meet their safety requirements.



Comments from the Minister for Regional Development

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	From the information provided, the Project is expected to generate substantial economic benefits at both the regional and national level. If the project were to deliver the expected high value direct jobs, MGL would become a significant employer for the Inland Otago economy. As outlined in the economic impact report, the project may struggle to source the number of workers needed to staff the mine, and there will be housing demands that the region may not be able to meet. These demands could also put upward pressure on rents and house prices in the area for existing residents.	Economics	<p>Substantive FTA Application:</p> <p>B.01 Benje Patterson (People and Places) – Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025)</p> <p>Response Evidence:</p> <p>Evidence of Benje Patterson</p>	<p>Despite relatively low levels of local unemployment in Inland Otago, the area has a history of attracting people from all over New Zealand, and the world, to meet employment needs. Over the 10 years to 2025, Inland Otago employment climbed by 16,048 at an average of 1,600 jobs per year (source: Infometrics Regional Economic Profile).</p> <p>MGL’s own survey of 647 prospective employees who had submitted expressions of interest for employment showed that 67% of respondents either already live or have accommodation within one-hour drive of the mine site, while 94% of people would use company-provided bus transport from centres including Cromwell, Alexandra, Queenstown, Wānaka and Hāwea if available to them.</p> <p>Over the past 12 months alone to February 2026, there have been 2,063 new dwelling units consented in Inland Otago, which is a record annual running total and is almost 500 dwelling units above the long-term annual average. In practical terms, this shows within a single year, the construction sector has lifted its build rate by a magnitude that could fully accommodate the modelled long-term housing demand of the BOGP.</p>

Comments from the Minister for Resources

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1	The project would support the Government’s Minerals Strategy for New Zealand to 2040 through the development of a large-scale, long-life gold operation using modern technology. Gold is included on New Zealand’s Critical Minerals List and gold mining remains one of New Zealand’s most established and internationally competitive mineral activities, with a strong export focus and a demonstrated ability to attract international capital investment.	MGL	N/A	MGL agrees.
2	MGL’s economic impact report projects total revenue of approximately \$6.75 billion over the life of the project. Given that almost all gold produced in New Zealand is exported, and subject to delivery of the applicant’s projections, the Project could make a nationally significant contribution to export receipts and materially support progress toward the Minerals Strategy’s export growth target.	MGL	N/A	MGL agrees.