

On 4 August 2026 HNZPT was emailed a set of proposed conditions dated 22 June 2026 in relation to the Bendigo-Ophir Gold Project. You asked for written response by 14 August 2026. HNZPT provided this response and has had discussions with Dr Woods since, resulting in some additional amendments.

HNZPT maintains its position, that the archaeological authority should **not be granted** and were this application applied for pursuant to the Heritage New Zealand Pouhere Taonga Act 2014 - it would be declined in its entirety.

Notwithstanding the above, we provide the following comments on the conditions as you have requested. This does not in any way alter the recommendation to decline an authority to destroy or modify a substantial number of archaeological sites, nor does HNZPT consider that there are any conditions that would mitigate the irreversible loss of the significant archaeological landscape in Bendigo-Ophir.

These comments are offered in good faith, and HNZPT requests that this entire document is provided to the Panel in order to ensure it has a full context and understanding that providing this feedback does not alter its recommendation. We have also provided a set of recommended conditions in the event the authority is granted, and the comments below refer to this set of conditions.

Conservation covenant and Resource Consent conditions

HNZPT provided comment pursuant to section 53 of the FTA Act regarding the proposal to revoke the conservation covenant and effects of the BOGP on the listed heritage area.

HNZPT understands that workshops were held in relation to these matters, however it was not invited to comment. With other Fast-track projects or large-scale projects outside of the Fast-track process HNZPT is usually consulted to ensure that any resource consent conditions are not in conflict or duplicitous of the authority conditions.

Approach to these conditions

As you are aware, this is a highly significant archaeological landscape that is made up of a number of highly significant archaeological complexes. The granting of an Authority will allow for the destruction of complexes that contribute to the values of this highly significant archaeological landscape.

The approach to investigation, recording and analysis should reflect the importance of the destroyed sites within this wider landscape. The approach should focus on in-context collection, analysis and recording that ensures the relationships between the sites within the complexes and with the wider landscape are investigated, understood and recorded.

HNZPT considers that the above can only be achieved in a two-stage approach:

1. A systematic and deliberate investigation of the archaeological sites with the highest significance prior to any Project works beginning; followed by
2. Remaining works that will be monitored by an archaeologist when an archaeological site will be affected by the Project works.

The investigation (HNZPT recommended condition 7) described in Stage 1 would be completed in accordance with the objectives and methodologies of an Archaeological Research Strategy (HNZPT recommended condition 4) that appropriately reflects the values of these sites in the wider landscape.

HNZPT Comment on Applicant conditions (22 June 2026 version)

Applicants Condition	HNZPT comment
Location: This approval applies to the location of activities shown in Attachment 1 comprising parts of Bendigo Station and Ardgour Station in the Dunstan Mountains of Central Otago and includes: a. The areas within which mining operations will occur including open pits, an underground mine, a tailings storage facility, engineered landforms, processing plant, haul roads and supporting / ancillary activities and infrastructure; b. Two bores on the Bendigo Terrace and associated pipelines for the supply of fresh water; and c. An upgrade to the intersection of SH8 and Ardgour Road.	Location: Legal descriptions of all parcels – TBC by Applicant to the extent they are within the Project Area shown in Attachment 1.
Section 45 Approved Person: Naomi Woods or any other person approved under section 45.	Section 45 Approved Person: Schedule 8, clause 7 (5) set outs the HNZPT must not recommend that the panel approve a person to carry out an activity under an authority unless satisfied that the person: a) has sufficient skill and competency, is fully capable of ensuring that the proposed activity is carried out to the satisfaction of Heritage New Zealand Pouhere Taonga and has access to appropriate institutional and professional support and resources; and b) in the case of sites of interest to Māori,- i. has the requisite competencies for recognising and respecting Māori values; and

	ii. has access to appropriate cultural support To support the nomination Dr Woods' CV has been included in the Substantive Application (K.07- New Zealand Heritage Properties Limited- CV for Dr Naomi Woods (10 March 2026) (1)). Policy 2.26 of the Tauākī Mātai Whaipara, Archaeology Statement of the SOGP and HNZPT's Guidelines for approval of person to carry out activity set the framework used when considering whether to approve a person for archaeological work. As demonstrated in Dr Woods' CV, she has sufficient skill and competency based on her adherence to accepted archaeological practice, including in gold fields archaeology. However, HNZPT has reservations as to whether she is 'fully capable of ensuring that the proposed activity is carried out to the satisfaction of Heritage New Zealand Pouhere Taonga'. HNZPT's recommended conditions require a detailed investigation guided by an archaeological investigation and research strategy. Dr Woods has not included any examples in her CV demonstrating design and completion of a detailed archaeological investigation of the nature required. We have had a positive discussion with Dr Woods about a proposed research strategy however until we have seen this in its final form, we are not able to confirm Dr Woods meets that requirement. In addition, we have also had positive conversations about professional support for Dr Wood's from a gold field archaeology specialist.
Landowner Consent: Landowner consent has been provided from the owners of Bendigo Station and Ardgour Station and Central Otago District Council. <i>[MGL has been engaging with the Department of Conservation throughout the development of the BOGP Substantive Application. Whilst formal</i>	Landowner Consent: To be provided. See HNZPT recommended condition 2.

<i>consent has not yet been provided for those areas of the project located on land administered by the Department of Conservation, detailed information of the proposed activities has been provided as part of the ongoing engagement that MGL has undertaken. MGL will work with the Department of Conservation to obtain its consent following lodgement of the Substantive Application.]</i>	
Determination: This archaeological authority is granted pursuant to section 81 of the Fast-track Approvals Act 2024 to enable the Bendigo-Ophir Gold Project, subject to the following conditions.	Determination: The FTAA Expert Consenting Panel grants an archaeological authority pursuant to section 81 of the Fast Track Approvals Act 2024 and section 48 of the Heritage New Zealand Pouhere Taonga Act 2014 in respect of the archaeological sites described above, within the areas specified in the location above, to Matakanui Gold Limited for earthworks associated with establishing, operating, and remediating an open pit and underground gold mine in the Bendigo-Ophir Gold Project (archaeological works), subject to the following conditions:
The authority holder must ensure that all contractors working on the project that may encounter archaeological evidence are briefed on site by the s45 approved person, who may appoint a person to carry out the briefing on their behalf, prior to any works commencing on the possibility of encountering archaeological evidence, how to identify possible archaeological sites during works, the archaeological work required by the conditions of this authority, and contractors' responsibilities with regard to notification of the discovery of archaeological evidence to ensure that the authority conditions are complied with.	Agree this condition would be appropriate if the Authority is granted. See HNZPT recommended condition 8.
Prior to the start of any on-site archaeological work, the authority holder must ensure that Heritage New Zealand Pouhere Taonga is advised of the date when work will begin. This advice must be provided at least 2 working	Agree with the intent of this condition – notification of start and completion of work – however, recommend splitting this into two

days before work starts. The authority holder must also ensure that Heritage New Zealand Pouhere Taonga is advised of the completion of the on-site archaeological work, within 5 working days of completion.	conditions and reordering to reflect the natural order and also how an Authority will be formatted in the HNZPT Authority Portal. See HNZPT recommended conditions 1, 15.
The authority must be exercised in accordance with the “Bendigo-Ophir Gold Project – An Archaeological and Heritage Management Plan” prepared by New Zealand Heritage Properties Ltd dated 22 June 2026. Any changes to the plan require the prior written agreement of Heritage New Zealand Pouhere Taonga. This approval applies to the location of activities shown in Attachment 1. If development plans are altered from those reviewed for the heritage assessment undertaken for the project (Bendigo-Ophir Gold Project, A Heritage Assessment, New Zealand Heritage Properties Ltd, February 2026), then HNZPT and NZHP must be alerted, as any changes may alter the assessment of effects or invalidate the authority.	If granted, an Archaeological Management Plan is essential in order to detail the management and mitigation of effects for this activity authorised by the Authority. The Archaeological and Heritage Management Plan (AMP) has not been certified by HNZPT as being fit for purpose and addressing all relevant elements required for this Project. As such, we cannot include reference to this AMP, and will instead provide for future certification of an appropriate AMP, with required elements specified in the condition itself. Further – this Authority applies only to the land specified and shown on the plan in Attachment 1. Any works outside of this will not be authorised by this Authority, and may therefore be in breach of the HNZPT Act and enforcement action will be taken. See HNZPT recommended condition 5.
Any earthworks that may affect any archaeological sites must be monitored by the s45-approved person who may appoint a person to carry out the monitoring on their behalf.	Agree this condition would be appropriate if the Authority is granted. See HNZPT recommended condition 12.
Any archaeological evidence encountered during the exercise of this authority must be investigated, recorded and analysed in accordance with current archaeological practice.	HNZPT agrees that if the Authority is granted, there must be recording of structures that is commensurate to their values as set out in AGS 1: Investigation and Recording of Buildings and Standing Structures (HNZPT, 2018).

a. Recording of Water Races: The affected portions of the Rise and Shine (G41/584) and Come-in-Time (G41/586) water races are to be recorded to a Level II standard as defined in HNZPT's guide, Investigation and Recording of Buildings and Standing Structures (HNZPT, 2018), and the full extent of each race digitally mapped. Affected portions of water race G41/6, G41/790 and G41/792 and any other identified water races are to be recorded to a Level III standard. Details of the recommended recording are provided in the certified Archaeological and Heritage Management Plan. b. Recording of Stone Huts and Dams: The stone huts (G41/265, G41/266, G41/267, G41/273, G41/606, G41/678 and G41/801) and dam (G41/269) are to be recorded to a Level II standard as defined in HNZPT's guide, Investigation and Recording of Buildings and Standing Structures (HNZPT, 2018). Details of the recommended recording are provided in the certified Archaeological and Heritage Management Plan. c. Recording of Stone Culverts and Revetments: The stone culverts and revetments (G41/589 and G41/782) are to be recorded to a Level II standard as defined in HNZPT's guide, Investigation and Recording of Buildings and Standing Structures (HNZPT, 2018). Details of the recommended recording are provided in the certified Archaeological and Heritage Management Plan.	See HNZPT recommended condition 13.
In addition to any tikanga agreed between the authority holder and takata whenua via Aukaha (on behalf of kā rūnaka) provided with the authority application, the following shall apply:	Agree a condition regarding tikanga is appropriate if the Authority is granted. Some parts of this proposed condition are represented in other conditions – see HNZPT recommended conditions as follows:

a. Access for takata whenua via Aukaha shall be enabled in accordance with any site safety requirements, in order to undertake tikanga. b. takata whenua via Aukaha shall be informed 5 days before the start and finish of the archaeological work. c. If any kōiwi (human remains) all work must stop within 20m of the find. NZHP will assist the authority holder in contacting all affected parties as soon as practicable, including takata whenua via Aukaha, HNZPT, and the police. The Ngāi Tahu policy for kōiwi takata shall also be followed (Te Rūnanga o Ngāi Tahu, 2019). d. If archaeological material of Māori origin is discovered at any stage, all work must stop within 20m of the find. NZHP will assist the authority holder in contacting all relevant parties including takata whenua via Aukaha and HNZPT and in accordance with the AMP. Any taoka tūturu are prima facie the property of the Crown who will be notified of the find. Taoka tūturu will be registered with the Ministry for Culture and Heritage. NZHP, in collaboration with manawhenua, shall notify the Ministry of Culture Heritage and establish the most appropriate temporary storage, management and care for taoka tūturu, until such time as traditional or actual ownership is determined, with an appropriate institution or kaitiaki.	recommended condition 10. recommended condition 1, 15. recommended condition 11. recommended condition 10.
The authority holder must submit an annual report to Heritage New Zealand Pouhere Taonga describing the activities that have occurred in the previous 12 months pursuant to this authority including the extent of monitoring (including an annual inspection of all heritage features within	Agree this condition would be appropriate if the Authority is granted, with some amendment to provide for updating of Site Record Forms. See HNZPT recommended condition 14.

20 m of the DDF will be undertaken for life of mine), supervision, recording and actions undertaken.	
The authority holder must submit a report synthesising the results of the archaeological investigations to date every 5 years from the issue date of this authority, completed following the Archaeological Report Guideline (AGS12 2023), is submitted to the Heritage New Zealand Pouhere Taonga Senior Archaeologist for inclusion in the Heritage New Zealand Pouhere Taonga Archaeological Reports Digital Library, to the Cromwell Museum and the NZAA Central Filekeeper, including: a) One hard copy and one digital copy of the final report are to be sent to Heritage New Zealand Pouhere Taonga. b) Digital copies of the final report must also be sent to the NZAA Central Filekeeper, Central Otago District Council, Cromwell Museum and takata whenua via Aukaha.	There is no requirement in the Archaeological Report Guideline (AGS12 2023) that provides for a report as described here, nor would we consider it appropriate to include a “synthesised report” in the HNZPT Archaeological Reports Digital Library. Based on further discussion with Dr Woods about this condition, it is understood that the intention was to stage the investigation reports separate to the overall final report. Agree with this approach, however the condition needs rewording and to be moved to the Archaeological Investigation condition (condition 7) to provide context. See HNZPT recommended condition 8.
Protection of sites / features: As a first principle, every practical effort must be made to avoid damage to any heritage site, whether known, or discovered during any redevelopment of the site. a. Site G41/4 (Rabbitter’s Hut) must be protected during works and any modifications for its future adaptive re-use may require a separate archaeological authority. h. No works will take place within the fenced boundary around site G41/5 (stock yards). i. Hut site G41/257 must be protected during installation of the Bendigo Sanctuary Fence as outlined in the Archaeological and Heritage Management Plan.	Agree that is appropriate to provide protection for recorded archaeological sites, however this condition needs rewording. See HNZPT recommended condition 9.

j. No topsoil or other overburden is to be stored within 10m of any previously recorded heritage site or additional Points of Interest identified by NZHPT in the Archaeological and Heritage Management Plan. k. The points at which the Rise and Shine (G41/584), Come-in-Time (G41/586) and newly recorded water races G41/790 and G41/792 enter the project area must be marked by semi-permanent timber survey pegs and avoided.	
Artefacts: All archaeological and twentieth century artefacts collected during the proposed works should be retained and offered to the Cromwell Museum.	Agree that is appropriate for the Authority Holder to develop a plan to curate the archaeological archive and implement this plan if the Authority is granted. This is in line with Policy 2.36 of Tauākī Mātai Whaipara, Archaeology Statement of the SOGP , and this should be included in the AMP. Note this, may require a funding plan or agreement with the museum in order to house the archive. There has been a very successful initiative in Kaikoura, “the Whare Taonga”, (based at Takahanga Marae) where artefacts encountered during the NCTIR earthquake recovery works are recorded, displayed, and cared for in purpose-built spaces.
Re-use of materials: Stone from the stone huts, dam, culverts and revetments should be repurposed for landscaping or other purposes where it will be visible to future visitors to the project area or offered to Cromwell Museum or other local heritage organisations for re-use. Prior to their re-use, all stone should be kept in a secure storage location, with material from each site stored discretely to preserve the provenance.	As above – this is to be encouraged, and should be included in the AMP. In line with the intent of these conditions, HNZPT considers that it would be a huge public benefit and positive archaeological outcome to install interpretation panels post remediation of some of the archaeological sites, in order to tell the story of the archaeological landscape.