



## Bendigo–Ophir Gold Project (FTA107)

From Katharine Smith [REDACTED]  
 Date Tue 31/03/2026 6:45 PM  
 To Substantive <substantive@fasttrack.govt.nz>  
 Cc Angus Barrington-Case [REDACTED]

1. Contact Details	
Please ensure that you have authority to comment on the application on behalf of those named on this form.	
Organisation name (if relevant)	QWIL Investments (NZ) Pty Limited
First name	Katharine
Last name	Smith
Postal address	[REDACTED]
Home phone / Mobile phone	[REDACTED] Work phone -
Email (a valid email address enables us to communicate efficiently with you)	[REDACTED]

2. We will email you draft conditions of consent for your comment	
<input checked="" type="checkbox"/> I can receive emails and my email address is correct	<input type="checkbox"/> I cannot receive emails and my postal address is correct

We are adjoining landowners to the Bendigo–Ophir Gold Project area and operate a commercial vineyard, with grape production and associated business activities dependent on secure, clean and reliable irrigation water sourced from the Bendigo Aquifer under an existing water permit.

Our submission is made in response to the invitation to comment under section 53 of the Fast-track Approvals Act. Our interest is direct and material: the proposed project has the potential to affect groundwater resources essential to our vineyard operations, product quality, and long-term viability.

We do not oppose development in principle. However, given the scale, duration and risk profile of the proposed mining activities, we seek strong, precautionary, and enforceable protections for groundwater quantity and quality, with particular regard to existing lawful water users and high-value agricultural production.

### **Groundwater Quantity and Reliability – Vineyard Irrigation Risk**

Viticulture requires predictable seasonal access to water, particularly during critical phenological stages (budburst, flowering, veraison, and ripening). Any reduction in availability or pressure from the Bendigo Aquifer may result in:

- Reduced crop yield
- Compromised vine health over multiple seasons
- Increased vulnerability during drought years

We are concerned that mine dewatering, pit excavation, underground workings, and cumulative extraction effects could lead to drawdown or altered hydraulic behaviour within the aquifer, particularly

during peak irrigation periods.

We request that any approval includes:

1. Clear acknowledgment that existing irrigation water permits take priority over mining-related takes.
2. Aquifer drawdown limits that are conservative and enforceable at vineyard boundaries, not solely at the mine site.
3. Seasonal modelling that explicitly accounts for peak irrigation demand coinciding with mine operations.

### **Groundwater Quality – Food Safety and Market Risk**

Our vineyard produces grapes that enter food and beverage supply chains, including value-sensitive domestic and export markets. As such, water quality is not merely an operational issue—it is a food safety, market access, and reputational issue.

We are concerned about the potential for contamination arising from:

- Cyanide use and storage
- Tailings and waste rock facilities
- Leachate migration over the medium to long term

For viticulture, even trace contamination can have disproportionate impacts, including:

- Residue concerns affecting grape acceptance by wineries
- Loss of certification or market confidence
- Reputational damage well beyond the duration of the mining operation

We therefore seek:

- Comprehensive baseline groundwater quality testing on our property prior to any project disturbance, funded by the applicant;
- Ongoing monitoring for parameters relevant to viticulture and food production (including cyanide, heavy metals, salinity, sulphates, and pH);
- A requirement that any project-attributable decline in water quality triggers immediate mitigation and compensation, without placing the burden of proof or delay on the landowner.

### **Monitoring, Access to Data, and Independent Oversight**

To be meaningful, monitoring commitments must be transparent, independent, and accessible to affected landowners.

We request conditions requiring that:

- Groundwater monitoring bores are installed between the mine footprint and adjoining vineyards, not just within mine boundaries;
- Monitoring data is provided to affected landowners regularly and in an understandable format;
- An independent regulator has the power to require operational changes or suspension if thresholds are exceeded.

### **Make-Good, Mitigation, and Financial Assurance**

We are concerned that high-value horticultural landowners may be exposed to risk without robust, enforceable make-good provisions.

Any approval should include:

- A legally binding make-good framework covering loss of water quantity, quality, or reliability;
- Provision for alternative water supply, bore replacement, treatment, or infrastructure upgrades at the applicant's cost;
- Financial assurance that remains valid throughout the mine life and post-closure, ensuring obligations are met regardless of future ownership or corporate change.

### **Cumulative and Long-Term Effects**

Viticulture is a long-term land use, with vines producing over decades and land value closely tied to environmental integrity. Short-term economic gains from mining should not transfer long-term environmental or financial risk onto neighbouring agricultural landowners.

We are particularly concerned about:

- Delayed groundwater quality impacts

- Post-closure contaminant migration
- Reliance on perpetual management regimes that may fail or become unfunded

The Panel is requested to give particular weight to the intergenerational nature of agricultural land use when assessing risk and consent conditions.

### **Request to the Expert Panel**

We respectfully request that the Expert Panel:

1. Applies a precautionary approach to groundwater protection in the Bendigo Aquifer;
2. Recognises the unique sensitivity of food-producing and export-oriented land uses;
3. Ensures that any residual risk is borne by the applicant, not adjoining landowners.

Our vineyard relies on clean, reliable groundwater from the Bendigo Aquifer as an essential input to production, compliance, and market confidence. Once compromised, water quality and reputation are both extremely difficult to restore.

We therefore seek certainty, enforceable protections, and recognition of the high-value, long-term nature of viticulture in the assessment of the Bendigo–Ophir Gold Project.

We thank the Panel for considering our submission.