
**BENDIGO-OPHIR GOLD PROJECT
SUBMISSION IN OPPOSITION**

To: Bendigo-Ophir Gold Project Panel
From: Schoolhouse Terrace Services Company Ltd

Postal Address: [REDACTED]

Contact: Hayden Johnston (Director)
Email Address (for correspondence & draft conditions): [REDACTED]
(I can receive emails and my email address is correct)
Telephone: 021 10 20 111

Date: 10 April 2026

Contents:

- **Submission from the company**
- **Supporting Expert Statement from Mining Consultant Chris Goddard**

1. This letter is submitted on behalf of **Schoolhouse Terrace Services Company Limited** to formally lodge our strong opposition to the proposed gold mine. The undersigned are directors and shareholders of Schoolhouse Terrace Services Company Ltd.
2. Our company holds the necessary consents to draw water to irrigate 90 hectares of vineyards at Bendigo, an operation that relies entirely on the integrity and availability of the aquifer identified by the applicant.
3. The company's water is pumped from a bore located within the Bendigo aquifer in close proximity to the site where the applicant seeks Fast-Track Approval to extract a much larger volume of water for the containment and processing of toxins at the mine site.

4. Major Concern Areas

Our opposition is based on the following critical concerns regarding the viability of local viticulture and the regional environment:

4.1 Impact on Existing Water Rights and Peak Flows: We are concerned about the substantial volume of water required by the applicant (reportedly around 100l/s) and the lack of specific detail provided regarding peak flows. Without rigorous, transparent modelling, there is a significant risk that the applicant's extraction will negatively affect our ability to obtain the necessary water from our adjacent bore, particularly during peak summer demand.

4.2 Recharge and Hydrological Integrity: The recharge of the Bendigo aquifer is, in part, fed by water running through and near the proposed mine site. This creates a two-fold risk: first, the high probability of the water picking up contaminants as it passes through a disturbed industrial site; and second, the risk of the mine works physically disturbing or diverting these natural flows, which are essential for the ongoing replenishment of the water table.

4.3 Unsustainable Resource Use and Precedence: The scale of the water requirement for the proposed mining operations is unsustainable. We maintain that established winegrowers who have relied on and made application for this water should have precedence over this resource.

4.4 Risk of Aquifer and River Contamination: The proximity of the proposed mine site to the aquifer presents an unacceptable environmental risk. We are particularly concerned about the potential for mine-polluted waters to impact the Rise and Shine Creek. This creek runs via the Bendigo Creek through the wine-growing area and eventually into the Clutha Mata-Au.

4.5 Cumulative Environmental Impact and Future Expansion: The applicant has stated plans to explore land adjacent to the current application. If successful, this expansion—and the potential for subsequent mines—will add further cumulative risk to our water availability and the long-term integrity of the aquifer.

4.6 Applicant's Lack of Experience: Matakanui Gold Ltd has no history of operating a mine of this scale. This lack of experience concerns our members because it reduces our confidence that the applicant will be capable of following all the requirements of consent necessary to protect our water supply in perpetuity. The applicant's failure to obtain the necessary consents for their workshops on Bendigo Loop Road and more recently for the tower they installed at the top of Battery Hill supports our concerns that the company may not follow best practice all the time for the life of the project.

4.7 The director's sought an opinion from a local mining consultant, Chris Goddard. Mr Goddard highlights several areas where the applicant's approach to mine safety and performance further reinforces our concerns that the applicant lacks the required experience to manage the site adequately.

4.8 Reputational and "Bendigo" Brand Impact: Our shareholders rely on the "100% Pure" image of the wider Central Otago region to market fine wine. We grow wine and operate tasting rooms and restaurants across multiple locations worldwide. Heavy industrial mining in close proximity to where the wines are grown is not compatible with marketing fine wine. The incompatibility and scale of the proposal at Bendigo will permanently damage the reputation of wines grown at Bendigo with international consequences.

5. Summary

The Fast-Track process should not come at the expense of existing consent holders or the fundamental protection of vital water resources. We do not believe this mining project is compatible with the current and future Bendigo-based wine industry.

Schoolhouse Terrace Services Company Limited requests that this application be declined to ensure the security of our water supply and the environmental safety of the region.

We thank the panel for considering our concerns.

Signed

A handwritten signature in black ink, appearing to be 'H Johnston', written over a horizontal line.

Hayden Johnston Director, Schoolhouse Terrace Services Company Limited

Jason Thomson Director, Schoolhouse Terrace Services Company Limited

Christopher Keys Winemaker, Gibbston Valley Wines (Shareholder)

1. My name is Chris Goddard. I am providing this statement to aid Hayden Johnston (Owner Tarras Vineyards) with his submission to the Expert Panel for the Bendigo-Ophir Gold Project. I am a mining consultant living in the Tarras community. I do not currently and have not worked for the applicant, any subsidiary or competitor and do not live in or own a property covered by Minute 3 of the Expert Panel
2. My statement is about the following topics:
 - a. Mining Safety approaches & performance as a predictor of future operational performance
 - b. Mining operator approaches to management of contractors as a predictor of future operational performance
 - c. Chain of Responsibility for inbound and outbound logistics to site
3. I have read the following application documents:
 - a. Focusing on safety performance, contractor management and CoR
 - i. B3 Geotechnical Assessment
 - ii. B4 TSF Design Report
 - iii. B9 Traffic Impact Assessment
 - iv. CEMP and supporting management plans
4. Background and experience – 31 years' work in the industry, including 15 years specialising in Mining Health and Safety and Contractor Management
 - a. DuPont trained (front line leadership, senior management audit/controls)
 - b. 15 years operational experience in Contractor Management across multiple commodities and jurisdictions
 - c. Health and Safety audit and assurance on behalf of mine operators and senior site executives
 - d. Governance of Warehouse and Logistics for mines in NSW, QLD, WA
5. Applicant provided information

- a. Most high risk work listed in the application is being performed by or will be performed by contractors including drill & blast, earthworks and inbound logistics (ANFO, process chemicals, plant and equipment)
- b. No information was included in the submission on past performance, audits, stop work authorities, escalation processes
- c. No information was included around standards and policies for inbound logistics Chain of Responsibility, Technical report B1 describes who would be involved, hazard management includes references only to work on site.

6. Desktop audit and perspectives on the applicant provided information

- a. The provided submission details policy obligations, no details about the operational system in place during 2020-2025 drilling programme or proposed post approval for pre-strip and future operations.
- b. The focus on site safety compliance is evident throughout the documents, including induction and operator accountability
- c. With the applicants ASX exposure, contracting with WA based companies for the plant construction, contracting with multinational heavy mobile equipment providers and Brisbane head office, it is unusual that internationally recognised supply chain accountability frameworks (such as CoR) is not mentioned in the application
- d. No detail was evident on roles and accountabilities. For Contractor Management, top performing mine operations will have a senior leader appointed, accountable for the Contractor Management system (best in industry performance: Coal in Queensland, detailing statutory training, accountability and audit requirements)
- e. Based on the application, one of the top 3 safety risks based on the is the interface between contractors and the operator and between the simultaneous contractor work fronts, no detail was included in the application documents
- f. Based on that risk, one of the top 3 safety controls is contractor prequalification standards which is not referred to in application documents.

7. The panel may wish to consider:

- a. With the heavy reliance on heavy vehicle movements to and from site, and heavy use of contractors, requiring the applicant to adopt and implement a Chain of responsibility (CoR) framework for all transport and

logistics activities associated with the project. This protects the adjacent properties and safety of the communities along the logistics routes to site.

- b. Reviewing 2020-2025 contractor performance on site to give clarity on applicants likely future operational performance
 - i. AIFIR & Critical risk reporting (2020-2025)
 - ii. regulatory compliance of work delivered by contractors
 - iii. Results of periodic & ongoing Contractor audits
 - iv. Procurement consideration of pre-qualification audits and previous safety results prior to contract award
- c. With heavy reliance on Contractors who are living within a community quite distant from specialist medical aid: requiring the applicant to have a Contractor Management system in place with clear accountabilities explicit in each line leader role description, with a single accountable senior leader experienced in either leading contractor engagements or having been a leader in mining services companies