

BEFORE THE EXPERT PANEL

FTAA-2507-1089

**UNDER
IN THE MATTER**

Fast-track Approvals Act 2024
of the Bendigo-Ophir Gold Project

**MEMORANDUM OF COUNSEL FOR SUSTAINABLE TARRAS
CROSS-EXAMINATION – LANDSCAPE HEARING**

Dated 5 June 2026

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TO THE EXPERT PANEL

In accordance with the Panel's Minute 30, Sustainable Tarras seeks leave for counsel to cross-examine the landscape witnesses on the following topics:

1. JWS Questions F and G:
 - a. Mr Garvan's and Mr Parker's assessments of the magnitude of effects on the Dunstan Mountains ONL.
 - b. Mr Garvan's and Mr Parker's opinions on the contextual relevance of a gold mine within this landscape.
2. JWS Question J: Mr Garvan's assessment of lighting / dark sky effects
3. JWS Question K: Mr Garvan's assessment of the Project's consistency with the covenant objectives.
4. JWS Question N: Mr Brown's reference to the Kings Quarry FTAA project as a quarry within an identified ONL.

The Panel's direction for cross-examination to be brief and focussed will be observed.

5 June 2026

A handwritten signature in black ink, appearing to read 'Sally Gepp', written in a cursive style.

Sally Gepp KC
Counsel for Sustainable Tarras Inc