

Before an Expert Consenting Panel

Under the

Fast-track Approvals Act 2024

And

In the Matter of

an application for approvals by Matakanui Gold Limited to establish, operate, rehabilitate and ultimately close an open pit and underground gold mining operation known as the Bendigo-Ophir Gold Project

Memorandum of Counsel on behalf of **Matakanui Gold Limited seeking leave to cross examine under Section 58(1)(e)**

Dated: 5 June 2026

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MAY IT PLEASE THE EXPERT PANEL

Introduction

1. This Memorandum of Counsel is filed on behalf of Matakanui Gold Limited (**Matakanui Gold**) seeking leave from the Expert Panel under Section 58(1)(e) of the Fast-track Approvals Act 2024 to cross examine witnesses at the landscape hearing on 9 June 2026.
2. Counsel proposes to cross examine expert witnesses only to the extent that the matters outlined below are not addressed through questions from the Expert Panel during the hearing.
3. Given that, this request is made on a conservative basis and may not ultimately be required.
4. Counsel seeks leave from the Expert Panel to conduct cross examination on the following topics for approximately ten minutes:
 - (a) Outstanding Natural Landscape scale of assessment.
 - (b) Relevant landscape assessment considerations for the Bendigo Conservation Covenant.

Dated 5 June 2026



Joshua Leckie / Charlotte Coyle / Mia Turner
Counsel for Matakanui Gold Limited