

BEFORE THE EXPERT PANEL

IN THE MATTER	of the Fast-track Approvals Act 2024 (FTAA)
AND	
IN THE MATTER	of an application for approvals under the FTAA for the Bendigo-Ophir Gold Project FTAA-2507-1089

MEMORANDUM OF COUNSEL FOR ENVIRONMENTAL DEFENCE SOCIETY INC (CROSS-EXAMINATION TOPICS FOR LANDSCAPE, 9 JUNE 2026)

05 June 2026

Environmental Defence Society Inc

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Introduction

1. This memorandum is filed by the Environmental Defence Society Inc. (**EDS**) in response to Minute 30.
2. Leave is sought for focused cross-examination on the following topics for landscape, on the proviso that the Panel may well have addressed some or all of the relevant matters that Counsel wish to raise in questions.
3. In the interests of time and efficiency, it is likely that Counsel will focus questions to particular witnesses, rather than all 'hot-tub' participants, with a likely focus on the Applicant's expert (Mr Rhys Girvan). However, this will depend on responses provided by experts to questions from the Panel.
4. Relevant topics have been identified at a comparatively high level, and greater granularity can be provided should that be required.

Issue G: Intactness of the ONL / Impacts on ONL

Will the ONL remain intact if consent were granted to the proposal (and exploring correlative adverse effects on ONL)

Issue K: Bendigo Conservation covenant

Identifying the relevant landscape effects of revocation of Bendigo Conservation covenant.

Consideration of alternatives

Whether and the extent to which these have been addressed by the Applicant in terms of comparative landscape impacts.

Issues M-V: 2nd JWS (pending)

Subject to review by Counsel, some targeted questions are likely to arise from the 2nd Landscape JWS (which is to be released on 9th June).

Other matters

5. EDS also wishes to advise the Panel that it seeks leave to cross examine the Planning experts on 18 June (on a strictly limited range of topics). Although EDS did not file planning evidence, it has relevantly addressed planning issues in its legal submissions. Counsel proposes to identify the relevant topics as directed in the Panel's Minute 30.

Dated this 05 June 2026