

BEFORE THE EXPERT PANEL

IN THE MATTER of the Fast-track Approvals Act 2024 (**FTAA**)

AND

IN THE MATTER of an application by Matakanui Gold Limited under section 42 of the FTAA for the Bendigo-Ophir Gold Project

APPLICATION NO. FTAA-2507-1089

Memorandum for Director-General of Conservation
re Minute 40 seeking leave to provide expert comment on Spring Annuals Report
Dated 23 July 2026

Barrister instructed: Dean van Mierlo; dean@environmentalbarister.co.nz

Pene Williams Senior Solicitor Rōia Matua Department of Conservation Te Papa Atawhai PO Box 5244 Dunedin 9054 Phone: [REDACTED] Email: [REDACTED]	Marie Payne Fast-Track Programme Lead Department of Conservation Te Papa Atawhai PO Box 10420 Wellington 6140 Phone: [REDACTED] Email: [REDACTED]
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May it please the Expert Panel (Panel),

The following matters are submitted on behalf of the Director-General of Conservation (DG):

1. Minute 40 of the Expert Panel¹ acknowledges receipt of the Spring Annuals Report 2025 provided by the Applicant in response to Minute 39. At paragraph [9] of Minute 40 the Panel allows parties the opportunity to seek leave to provide expert comment on this report.
2. In his evidence for the DG, Mr Crowe set out his opinion the project site is a national stronghold for communities of spring annual plants and commented there were large gaps in the survey data then available.²
3. Mr Crowe is considering the information in the Spring Annuals Report 2025 and can provide further expert comment, to assist the Panel, prior to the expected recommencement date.
4. On this basis, I seek leave for Mr Crowe to provide further expert comment on the Spring Annuals Report 2025.
5. Thank you for your consideration of this request.



Pene Williams

Counsel for the Director-General

¹ [Minute 40](#) of the Expert Panel – Geotechnical Inquiries and Spring Annual Report, dated 8 July 2026

² DOC s51 Covering report – Appendix G – [Expert Statement Vegetation and Flora, M Crowe](#), paragraphs 23-29.