

Memorandum

To: Environmental Protection Authority (Attention: Daya Thomson)

From: Mitchell Daysh (on behalf of Matakanui Gold Limited)

Date: 10 March 2026

Re: Summary of Amendments to the Bendigo-Ophir Gold Project Fast-track Application

INTRODUCTION

The purpose of this memorandum is to provide a concise summary of the proposed updates to the Substantive Application for the Bendigo-Ophir Gold Project (“**BOGP**”) that was originally submitted to the Environmental Protection Authority (“**EPA**”) by Matakanui Gold Limited (“**MGL**”) on 31 October 2025. This memorandum is accompanied by several technical assessments described below.

These amendments and updates to documents within the various parts of the Substantive Application have primarily arisen through a series of site visits and workshops that MGL held with the relevant administering agencies and consent authorities – namely the Department of Conservation (“**DOC**”), Heritage New Zealand Pouhere Taonga (“**HNZPT**”), the Otago Regional Council (“**ORC**”) and Central Otago District Council (“**CODC**”) – in recent weeks.

It is noted that MGL has also received various further information requests from DOC, HNZPT, ORC and CODC following the lodgement of the Substantive Application across a broad range of topics. MGL and its technical consultants have prepared further information responses to address each of these further information requests. These responses have previously been provided to the respective regulator to inform their Section 53 Reports and are not within the ambit of this summary memorandum.

The memorandum is accompanied by a number of supporting folders that align with the structure of the Substantive Application currently available on the fast-track portal. These folders contain all the amended or new documents that are to be uploaded to the fast-track portal to supersede and/or supplement existing documents. Specifically, only one of the reports lodged on 31 October 2025 is to be replaced (i.e. the Heritage Assessment), the various concessions have been slightly amended and all of the other documents are new.



Some of the consent agencies have already received some of the documents provided alongside this memorandum, however, MGL wishes to provide the Panel and other parties with a single collated summary of all amendments, updates and additional information prior to the Panel notifying the various parties that will be invited to comment on the Substantive Application on 11 March 2026.

PART A - CORRECTIONS TO SUBSTANTIVE APPLICATION REPORT

MGL wishes to provide a number of clarifications and corrections to aspects of the Substantive Application Report. These relate to:

- > **Gold Smelting Furnace** - Section 3.9.1.2 of the Substantive Application Report incorrectly states that the gold furnace will be diesel-powered.¹ MGL confirms the gold furnace at the processing plant will be electric-powered, and as such, the requirements in the National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023 and the Resource Management (National Environmental Standards for Greenhouse Gas Emissions from Industrial Process Heat) Regulations 2023 are not relevant.
- > **Communications Tower on Bendigo Station** - Section 3.17.2 of the Substantive Application Report notes that two 6.5 m antenna structures / communication towers are proposed to be located within the Project Site. The report states that the communications tower located on Bendigo Station is a permitted activity as it has become freehold land under the Crown Pastoral Land Act 1998.² However, this communication tower requires resource consent under Section 13 of the District Plan and also requires consent from DOC as it is located within the Bendigo Conservation Covenant. MGL will apply for resource consent and DOC approval for this tower in a separate application outside the fast-track process.
- > **Chorus Fibre Optic Cable Realignment** – Section 3.18.3 of the Substantive Application Report incorrectly shows the relocated fibre optic cable running along a fence line on Bendigo Station to the south of its current alignment.³ MGL confirms the fibre optic cable will be co-located within the proposed Ardgour Rise alignment and a separate concession is sought for this activity (discussed later in this memorandum).
- > **Proposed Concession Updates** – As discussed in more detail in the following sections of this memorandum, MGL is making several minor updates to the proposed concessions, which includes the concession plans. Sections 4.3 and 8.8.1 of the Substantive Application Report provide a summary of the activities sought to be authorised by the concessions and

¹ Page 159 of *A.10 Section 3 - Project Description* and page 65 of *H.01 RMA Rules Assessment*.

² Page 201 of *A.10 Section 3 - Project Description* and page 16 of *H.01 RMA Rules Assessment*.

³ Page 206-207 of *A.10 Section 3 - Project Description*.

reproduce the concession plans set out in Part C of the Substantive Application.⁴ Any aspect of these concession summaries and plans within these sections that conflict with the updated concession applications and plans outlined in this memorandum are to be disregarded.

- > **Proposed Culverts** – the RMA Rules Assessment provided alongside the Substantive Application Report notes that four culverts are proposed in the bed of Rise and Shine and Shepherds Creeks.⁵ MGL confirms that this reference is incorrect and land use consent is only sought to install a single culvert in the bed of Rise and Shine Creek.
- > **Noise and Vibration Consent Requirements** – Section 4.2.3 of the Substantive Application and the RMA Rules Assessment note that resource consent is not required for construction and operational noise or blasting activities. In response to a further information request from CODC received on 23 January 2026, MGL confirms that the following additional rules are triggered giving rise to the need for a Land Use Consent in relation to noise and vibration activities under the Central Otago District Plan (“**District Plan**”):
 - > A Land Use Consent as a restricted discretionary activity for operational noise that will exceed the relevant permitted operational noise standards in Rule 4.7.6.E of the District Plan;
 - > A Land Use Consent as a restricted discretionary activity for construction noise that will exceed the relevant permitted construction noise standards in Rule 12.7.4.ii of the District Plan; and
 - > A Land Use Consent as a discretionary activity for blasting activities that will exceed the relevant permitted blasting standards in Rule 12.7.4.iv of the District Plan.

Despite the above, and for the avoidance of doubt, it is noted that Section 4.2.3 of the Substantive Application Report states that MGL is seeking to obtain all necessary Land Use Consents to authorise all activities requiring a resource consent under the District Plan associated with the construction, operation, maintenance and rehabilitation and closure of the BOGP (whether or not that goes beyond the rules expressly listed as being triggered).

The existing Substantive Application Report submitted on 31 October 2025 has not been amended to address these corrections and clarifications at this time.

⁴ Pages 243-248 of A.11 Section 4 – Approvals Sought and Pages 497-520 of A.15 Section 8 – Fast-Track Approvals Act 2024 Requirements.

⁵ Page 58 & 78 of H.01 RMA Rules Assessment.

PART B - UPDATED TECHNICAL REPORTS

Following various correspondence and collaboration between MGLs heritage specialist, NZ Heritage Properties Limited, and HNZPT and DOC, the overarching heritage assessment for the BOGP has been updated.

This is the only technical report submitted as part of the Substantive Application has been updated. MGL requests that the existing version of *B.34 – New Zealand Heritage Properties Limited - Heritage Assessment (NZHP 2025a)* that was submitted on 31 October 2025 be disregarded and replaced with the following updated assessment:

- > *B.34 – New Zealand Heritage Properties Limited – Heritage Assessment (NZHP 2025a) (10 March 2026).*

This updated heritage assessment is provided alongside this memorandum in the folder titled **Part B – Technical Reports (10 March 2026)**.

It is also noted that the existing terrestrial ecology assessment titled *B.08 – Alliance Ecology Consulting – Assessment of Ecological Effects (Alliance 2025)* that was submitted as part of the Substantive Application on 31 October 2025 was missing one appendix relating to offsetting models. As above, MGL requests that this existing assessment is disregarded and replaced with the following updated assessment that now includes the missing appendix:

- > *B.08 – Alliance Ecology Consulting – Assessment of Ecological Effects (Alliance 2025) (10 March 2026).*

This updated terrestrial ecology assessment is provided alongside this memorandum in the folder titled **Part B – Technical Reports (10 March 2026)**. It is emphasised that the report is not amended with only the missing appendix added.

PART C – AMENDMENTS TO PROJECT MAPS

As discussed in the next section, feedback received from DOC through recent site visits and workshops has resulted in several minor changes to the proposed concession applications.

As a result, a number of concession plans that are included in the various concession applications and set out in Part C of the Substantive Application have been amended to reflect these changes. This includes direct changes to specific concession plans (to optimise the concession activity locations and ensure they can be transferred to the relevant owners outside the fast-track process) and consequential amendments to other plans that show the proposed concessions for the BOGP. The following plans have been updated:

- > *C.03 - BOGP Consent Area (dated 10 March 2026);*

- > *C.11 – Adjacent Land Ownership - SH8 Intersection (10 March 2026);*
- > *C.22 - Ardgour Rise and Chorus Fibre Cable Alignment (10 March 2026);*
- > *C.24 - Proposed Concessions Overview (10 March 2026);*
- > *C.25A – Proposed Fibre Optic Cable Concession (10 March 2026);*
- > *C.26A – Proposed Fibre Optic Cable Concession – GPS Coordinates (10 March 2026);*
- > *C.27 – Proposed State Highway 8 Concession (10 March 2026);*
- > *C.28 - Proposed State Highway 8 Concession – GPS Coordinates (10 March 2026);*
- > *C.33 – Proposed Monitoring Bore Concession (10 March 2026); and*
- > *C.34 – Proposed Monitoring Bore Concession – GPS Coordinates (10 March 2026).*

MGL requests that the relevant plans submitted as part of the Substantive Application on 31 October 2025 are disregarded and replaced with these updated plans.

These updated project plans are provided alongside this memorandum in the folder titled **Part C – Project Maps (10 March 2026)**.

PART D - AMENDMENTS TO CONCESSION APPLICATIONS

In line with feedback received from representatives of DOC and their advisors that was discussed in a series of site visits and workshops, several minor amendments have been made to the concession applications within the jurisdiction of DOC to optimise the concession activity locations and ensure they can be transferred to the relevant owners following the fast-track process. In each case, a tracked version and a clean version of each concession application has been prepared and is attached to this memorandum.

These amendments are described in the follow sub-sections.

Ardgour Rise and Fibre Optic Cable Concessions

As lodged, the Ardgour Rise Concession Application included the proposed upgrade of an existing 4WD track for public access (as an alternative to Thomson Gorge Road) and the realignment of a fibre optic cable (owned by Chorus) that is currently located within the road reserve of the existing Thomson Gorge Road. Because these are essentially two separate activities and the concessions will, if granted, be transferred to other parties – being CODC in relation to the new Ardgour Rise access road and Chorus in relation to the relocated fibre optic cable - the Ardgour Rise Concession Application has been split into two separate applications as follows:

- > *D.06A – Concession and Conditions for Ardgour Rise – Access Track (10 March 2026); and*
- > *D.06B – Concession and Conditions for Ardgour Rise – Fibre Optic Cable (10 March 2026).*

As discussed in the preceding section of this memorandum, the relevant concession plans have also been updated to reflect this split. Importantly, these updates do not change the nature or scale of the two relevant activities.

Tracked and clean versions of these documents are provided alongside this memorandum in the folder titled **Part D – Proposed Approvals and Conditions (10 March 2026)**.

State Highway 8 / Ardgour Road Intersection Upgrade Concessions

The SH8 / Ardgour Road Intersection Upgrade Concession Application involves the upgrade of an intersection where roading falls within the jurisdiction two road controlling authorities – being the New Zealand Transport Agency / Waka Kotahi (“**NZTA**”) and CODC. Because it is intended that a concession will ultimately be held separately by each of the two road controlling authorities for their portion of the intersection, MGL now propose that the concession application be split into two separation applications. The demarcation line is 20 m east of the existing intersection ‘limit line’ (the latter being the give way lines that will be painted on Ardgour Road).

A further amendment to these two applications is that the proposed construction laydown area on the western side of SH8 is no longer proposed. This is to ensure that recreational access to the Lindis River is maintained throughout the time it takes to upgrade the intersection (estimated to be approximately three months). The existing construction laydown area / gravel dump on the eastern side of SH8 north of Ardgour Road will be a sufficiently large enough area for construction laydown activities associated with the proposed intersection upgrade.

The two amended concessions for the SH8 and Ardgour Road Intersection are as follows:

- > *D.07A – Concession and Conditions for SH8 and Ardgour Road Intersection (NZTA) (10 March 2026); and*
- > *D.07B – Concession and Conditions for SH8 and Ardgour Road Intersection (CODC) (10 March 2026).*

The relevant concession plans have been updated to reflect this split and remove the relinquished construction laydown area on the western side of SH8. These updates do not change the nature or scale of the activities authorised by the concessions (if anything, the scope of activities is slightly reduced).

Tracked and clean versions of these documents are provided alongside this memorandum in the folder titled **Part D – Proposed Approvals and Conditions (10 March 2026)**.



Come-in-Time Concession

DOC has raised some concerns in relation to the length of the proposed alternative access route to the CIT Battery (being approximately 4 km compared to the existing access track from Thomson Gorge Road which is about 400 m in length). A slight amendment to the concession application has been made to provide for any alternative route within the Bendigo Historic Reserve that might be considered through the fast-track process and determined in the decision. The term of this concession has also been extended from 10 to 30 years.

These amendments are reflected in an updated concession application document as follows:

- > *D.08 – Concession and Condition for Access Route to CIT Battery (10 March 2026).*

Tracked and clean versions of this document are provided alongside this memorandum in the folder titled **Part D – Proposed Approvals and Conditions (10 March 2026)**.

Willow Management Concession

During a site visit, the methodology for willow management was discussed and it was agreed that it is likely to include a combination of (a) predominantly drilling and poisoning the trees, and (b) cutting and removing trees where they are located in proximity to heritage sites and areas that are likely to be accessed by the public. As such, the concession application has been slightly amended to not refer to “spraying” but rather the “use of herbicide” to provide for a greater range of willow management options. This change is both in relation to the description of the concession activity and the condition that requires the Concession Holder to submit a plan for certification setting out the methodology for the proposed willow management. The term of this concession has also been extended from 10 to 15 years.

These amendments are reflected in an updated concession application document as follows:

- > *D.09 – Concession and Conditions for Willow Management (10 March 2026).*

Tracked and clean versions of this document are provided alongside this memorandum in the folder titled **Part D – Proposed Approvals and Conditions (10 March 2026)**.

It is anticipated that further consent conditions (not yet drafted) could include performance outcomes in relation to the success of the proposed willow management.

Water Monitoring and Access Concession

During a site visit, DOC personnel advised that the flat area adjacent to the Bendigo Creek on which a groundwater monitoring bore was proposed to be located is an area of former miner huts. To avoid any adverse effect on that heritage site, the proposed groundwater monitoring

bore is now proposed to be located on the opposite side of the Bendigo Creek (near the true right bank) near the end of the existing access track.

This proposed new groundwater monitoring bore location is reflected in an updated concession application document as follows:

- > *D.10 – Concession and Conditions for Monitoring and Access (10 March 2026).*

Tracked and clean versions of this document are provided alongside this memorandum in the folder titled **Part D – Proposed Approvals and Conditions (10 March 2026)**. The relevant concession plan has also been updated to show the proposed new location of the groundwater monitoring bore.

The new location of the proposed groundwater monitoring bore ensures the protection of the historic site and means that the Bendigo Stream does not have to be crossed to provide access to the bore.

PART D - AMENDMENTS TO ARCHAEOLOGICAL AUTHORITY

The application to HNZPT has been amended in the following manner:

- > MGL is seeking a 35-year term of consent (expiring 31 October 2061 assuming an Authority is granted at the end of October 2026);
- > An update in relation to the archaeological sites that will be affected by the BOGP;
- > A refinement (and greater clarity) as to the area covered by the application (and any Authority that may be granted); and
- > Changes to the conditions that mostly require additional monitoring and reporting.

These amendments are reflected in an updated archaeological authority application as follows:

- > *D.05 – Archaeological Authority and Conditions (10 March 2026).*

Tracked and clean versions of this document are provided alongside this memorandum in the folder titled **Part D – Proposed Approvals and Conditions (10 March 2026)**.

PART D – AMENDMENTS TO CONDITIONS

As previously noted, it is anticipated that there will be one or more conditions workshops held at a later date as part of the processing of BOGP application. However, following the site visits and workshops held with the administering agencies and consent authorities, MGL is proposing changes to a CODC district consent condition and a new ORC regional consent condition as follows:

Mining of the Come-in-Time Open Pit

Condition 111 of the *D.01 CODC Land Use Consent and Conditions* is proposed to be amended as follows:

Mining of the 23.26 ha Come-in-Time (CIT) Open Pit (including establishing haul roads) will be staged to allow the implementation of the Cushionfield ARP:

- (a) The early disturbance area can proceed from the commencement date of this consent within the 2.7 hectare area shown in **Attachment D**; and*
- (b) Disturbance of the remainder of the CIT Open Pit footprint can only proceed if sufficient numbers of ~~cushionfield vegetation is spring annuals are~~ discovered in the wider Dunstan Ecological District such that either net gain outcomes can be demonstrably achieved, and/or the population of the two spring annuals within the CIT Open Pit footprint ~~recorded in 2025~~ is equal to or less than 1% of the known population of these spring annuals plants in the wider Dunstan Ecological District. This can be demonstrated by either one or a combination of the following methods:*
 - i. The propagation and / or species recovery in the surrounding offsetting and compensation sites as informed by the Cushionfield ARP; and / or*
 - ii. The discovery of further spring annual populations within the wider Dunstan Ecological District. ~~These discoveries can be evidenced by either identifying and documenting further spring annual populations, and/or surveying a representative sample of the Dunstan Ecological District and extrapolating the abundance of spring annual populations over the wider Dunstan Ecological District.~~*

Shepherds Tailings Storage Facility

The Seepage Risk Assessment memorandum prepared by Ryan Burgess dated 5 March 2026 (accompanying this memorandum in the folder titled **Part K – Additional Reports and Supporting Information**) concludes that the risk of seepage migration from the Project Site to down valley receptors is considered low. One of the reasons for that conclusion is that a range of secondary / contingency seepage interception system measures could be undertaken in the event that monitoring shows higher than expected levels of contaminants seeping from underneath the Tailings Storage Facility (“**TSF**”).

It was agreed during one of the workshops that a consent condition should be included in *D.04 – Schedule Two – General Conditions for ORC Resource Consents* which requires the installation of secondary / contingency seepage interception system measures in the event that monitoring shows higher than expected levels of contaminants seeping from underneath the TSF.

Such a condition will be drafted and advanced at a later date (either before or during any conditions workshops) and will need to include appropriate trigger levels which will require further assessment to be undertaken. It is anticipated that the appropriate trigger levels will be the subject of expert caucusing.

PART G - MANAGEMENT PLANS

Useful feedback has been obtained from the administering agencies and consent authorities for several aspects of management plans, including agreed matters to be updated. MGL is not proposing amendments to management plans at this time but anticipates making amendments to various management plans at a later date as part of the processing of BOGP application.

PART K – ADDITIONAL REPORTS / SUPPORTING INFORMATION

As a result of requests from administering agencies and recent site visits and workshops with administering agencies and consent authorities, MGL proposes to submit several new and / or additional technical reports and memorandums. These documents are a combination of new memorandums and supporting information that have arisen from workshop discussions or existing technical reports previously commissioned by MGL that were not originally submitted as part of the Substantive Application on 31 October 2025.

To align with the current structure of the Substantive Application, MGL proposes to include these additional documents within a new Part K titled ‘Additional Reports and Supporting Information’.

These reports are as follows:

- > *K.01 - Kōmanawa Solutions Limited - Post Closure Impacts on the Ardgour Aquifer dated February 2025 (10 March 2026);*
- > *K.02 - Boffa Miskell - Assessment of Dunstan Mountains Outstanding Natural Landscape dated May 2024 (10 March 2026);*
- > *K.03 – Central Environmental Services - Ardgour Rise Re-Alignment Vegetation Survey and Botanical Biodiversity dated May 2025 (10 March 2026);*
- > *K.04 - E3 Scientific - Freshwater Ecological Assessment dated May 2023 (10 March 2026);*
- > *K.05 - Hydro Geochem Group - BOGP MWSF Seepage Risk Assessment (10 March 2026);*
- > *K.06 - Marshall Day Acoustics - BOGP Blasting Vibration Effects on Heritage Structures (10 March 2026); and*
- > *K.07 - New Zealand Heritage Properties Limited - CV for Dr Naomi Woods (10 March 2026).*

These reports accompany this memorandum in the folder titled **Part K – Additional Reports and Supporting Information (10 March 2026)**.

It is noted that some of these documents may have already been provided to the administering agencies and / or consent authorities through earlier further information requests (to support the preparation of their Section 53 reports), however MGL considers it useful to provide as one comprehensive set.

