

APPLICANT RESPONSES TO RELEVANT COMMENTS FROM PARTIES WITH EXISTING INTERESTS FOR THE BENDIGO-OPHIR GOLD PROJECT

This document contains the key comments from the following parties:

- > New Zealand Transport Agency Waka Kotahi;
- > Aurora Energy;
- > Shine Irrigation Company Limited;
- > Bendigo Terrace Farming Limited Partnership; and
- > Schoolhouse Terrace Services Company Ltd.

Comments from New Zealand Transport Agency Waka Kotahi

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	NZTA has corresponded with MGL representatives about entering into a developer agreement. That agreement would sit outside of the formal FTAA process and would formalise the roles and responsibilities of both parties in relation to the SH8 / Ardgour Road intersection upgrade. At this time, it is NZTA's expectation that MGL would cover the full costs associated with the SH8 / Ardgour intersection upgrade, including the costs associated with statutory approvals (like resource consents, Notices of Requirement, Outline Plan of Works under the Resource Management Act, Wildlife Act and/or Conservation Act approvals and Heritage NZ Pouhere Taonga Act authorities); the costs associated with the design and construction of the intersection upgrade works including the associated design and post construction audits; and the costs of land transfer and provision of exchange land.	MGL	N/A	This will be included in the developer agreement between NZTA and MGL.
2	NZTA considers that Condition 43 should be amended to include a timeframe within which the intersection upgrade must be completed. The ITA indicates that traffic generation is anticipated to be greatest during mine construction, with up to 400 vehicles per day (vpd), dropping to 250 vpd during the mine's operational phase. Given that vehicle generation will be most intensified during the construction phase, and therefore effects on the safe and efficient operation of SH8 will likely be greatest during this phase, NZTA consider that the intersection upgrade should be completed prior to mine construction commencing.	MGL Planning	Response Evidence: Evidence of Andrew Metherell	MGL will require four months construction duration from development agreement approval and FTA consent acceptance, subject to road sealing constraints (refer below). Some traffic should be able to use the intersection subject to suitability of temporary traffic management plan whilst constriction is occurring.
3	Condition 43(a) currently requires that the right turn bay must be designed in accordance with NZTA design requirements. The wording of this condition should be amended to specify the relevant design guidelines as per draft below. The relevant guidelines are the New Zealand Transport Agency 'Traffic Control Devices Manual Part 4 (Intersections) October 2024 and Section 15 (including Figure 15.5 "Markings for right	Planning	Response Evidence: Evidence of Andrew Metherell	No changes to the conditions have been made in response to this comment, however, this will be addressed through future consent condition workshops with all relevant parties. That said, there is unlikely to be any concerns with the nature of the conditions proposed.

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	<p>turn bays in rural areas”), as well as Austroads ‘Guide to Road Design Part 4: Intersections and Crossings – General’ dated May 2023. Draft below:</p> <p>43. <i>Prior to the construction of the Bendigo-Ophir Gold Mine the Consent Holder must upgrade the intersection of State Highway 8 and Ardgour Road to:</i></p> <p>a. <i>Include a right turn bay on State Highway 8 from the southwest into Ardgour Road. This must be designed in accordance with New Zealand Transport Agency Traffic Control Devices Manual Part 4 (Intersections) October 2024 and Section 15 (including Figure 15.5 “Markings for right turn bays in rural areas”), and Austroads ‘Guide to Road Design Part 4: Intersections and Crossings – General’ dated May 2023, NZ Transport Agency / Waka Kotahi design requirements;</i></p>			
4	<p>Condition 43(b) refers to ‘extending sightlines’ at the SH8 /Ardgour Road intersection, but does not quantify to what extent the sightlines should be extended. The extent to which sightlines can be reasonably practicably extended will be determined through the detailed design process. Draft wording in Line 5.</p>	Planning	<p>Response Evidence:</p> <p>Evidence of Andrew Metherell</p>	<p>No changes to the conditions have been made in response to this comment, however, this will be addressed through future consent condition workshops with all relevant parties. That said, there is unlikely to be any concerns with the nature of the conditions proposed.</p>
5	<p>Condition 43(b) seeks to ensure that two-way movement of vehicles through the intersection is accommodated but doesn’t link this to any design guidelines or the agreed outcomes of the detailed design process. The condition wording should be amended to reference relevant standards/guidelines and the outcome of the detailed design process. NZTA anticipate that Central Otago District Council will also have standards /guidelines that it is likely to want the applicant to adhere to accommodate the two-way movement.</p> <p>b. <i>Extend sightlines and ensure that two-way movement of trucks turning in and out of Ardgour Road can be accommodated. The detailed design, addressing these matters, must be prepared in accordance with Austroads ‘Guide to Road Design Part 4: Intersections and Crossings – General’ dated May 2023 and the NZTA Planning Policy Manual 2007, and as determined through the detailed design process; and</i></p>	Planning	<p>Response Evidence:</p> <p>Evidence of Andrew Metherell</p>	<p>No changes to the conditions have been made in response to this comment, however, this will be addressed through future consent condition workshops with all relevant parties. That said, there is unlikely to be any concerns with the nature of the conditions proposed.</p>
6	<p>Condition 43(c) uses uncertain terminology, ‘Provide for’. More directive and certain wording, like ‘incorporate’, should be used instead. The relevant guidelines and standards to be complied with when designing roadside barriers, flag lighting and signage are referenced in the condition.</p> <p>c. <i>Provide for Incorporate consequential changes to roadside infrastructure including roadside barrier changes, flag lighting, and signage as determined through detailed design processes. Design of roadside barriers must be in accordance with Austroads design guidance. Design of flag lighting must be in accordance with New Zealand Transport Agency lighting policy for flag lighting</i></p>	Planning	<p>Response Evidence:</p> <p>Evidence of Andrew Metherell</p>	<p>No changes to the conditions have been made in response to this comment, however, this will be addressed through future consent condition workshops with all relevant parties. That said, there is unlikely to be any concerns with the nature of the conditions proposed.</p>



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	<i>(3 lights) and the design of signage must be in accordance with New Zealand Transport Agency Traffic Control Devices Manual and Rule for signage.</i>			
7	<p>Condition 44 should be amended to include a requirement that the Consent Holder obtain written confirmation from NZTA that NZTA is satisfied that the final design drawings, and any changes suggested in the design safety audit, meet NZTA and Austroad standards. And that the condition should be amended to require the Consent holder to obtain written confirmation from NZTA that the physical upgrade works, including any works recommended by the post construction safety audit, have been completed to an acceptable standard. The written confirmation from NZTA should be submitted to the Council, prior to Council certifying the final design drawings and the completion of the physical upgrade works respectively.</p> <p>The intersection upgrade works, including works recommended in the post construction safety audit, should be completed prior to the construction of the mine commencing so the intersection is safe during construction when movements are expected to be greatest. Draft below:</p> <p><i>44 a. Prior to commencing construction of the State Highway 8 / Ardgour Road intersection upgrade works, submit the final design drawings for the intersection upgrade to Central Otago District Council for certification that the design meets the requirements of Condition 43 (a) to (c) above. The final design drawings must also be accompanied by the independent design safety audit required by condition 45 below, as well as written confirmation from the New Zealand Transport Agency that it is satisfied that the final design drawings meet New Zealand Transport Agency and Austroads standards; and</i></p> <p><i>b. Upon completion of the upgrade to the State Highway 8 / Ardgour Road intersection and prior to the construction of the Bendigo-Ophir gold mine commencing, provide to the Central Otago District Council, for certification, documentary evidence that the upgrades certified under (a) have been completed in accordance with the design certified under Condition 44(a) and that any further works recommended in the post construction safety audit, required by Condition 45, have also been undertaken. This documentary evidence must also include written confirmation from the New Zealand Transport Agency that it is satisfied the upgrade of the intersection, including any changes required by the post construction safety audit, have been satisfactorily completed.</i></p>	Planning	<p>Response Evidence:</p> <p>Evidence of Andrew Metherell</p>	No changes to the conditions have been made in response to this comment, however, this will be addressed through future consent condition workshops with all relevant parties. That said, there is unlikely to be any concerns with the nature of the conditions proposed.
8	<p>Condition 45 - any changes recommended by the post construction safety audit should be implemented before construction of the mine commences. Draft amendment below</p> <p><i>45. The design of the proposed upgrade of the intersection of State Highway 8 and Ardgour Road must be subject to an independent design safety audit and post construction safety audit. The audits are to be carried out by safety auditors experienced in highway intersection design, appointed in consultation with NZ Transport Agency / Waka Kotahi. Any changes recommended as a result of the safety</i></p>	Planning	<p>Response Evidence:</p> <p>Evidence of Andrew Metherell</p>	<p>Refer to Andrew Metherell evidence commenting on addressing safety audit agreed actions rather than the safety audit recommendations, and timing being reflective of the safety risk involved. The following condition is proposed:</p> <p>“Any changes to the intersection that are recommended in agreed actions from the post construction safety audit shall be undertaken</p>



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	<p>audits, including design changes and post construction changes, must be agreed with the Central Otago District Council in consultation with NZ Transport Agency / Waka Kotahi. Any changes to the intersection that are recommended in the post construction safety audit shall be undertaken prior to the construction of the mine commencing.</p>			<p>prior to the construction of the mine commencing within two months of the completed safety audit, unless different timing is agreed with Central Otago District Council in consultation with the NZ Transport Agency / Waka Kotahi taking into account the level of risk associated with the safety concern and the practicable ability to implement the change immediately”.</p>
9.	<p>WRT the proposed Access Road Construction Traffic Management Plan (ARCTMP), dated July 2025, provided in G.19 of the Application NZTA would recommend one amendment be made to this Plan, for the avoidance of doubt, being that no road sealing associated with the intersection upgrade should occur during the months of winter, as the typically cooler winter temperatures adversely impact the quality of the new seal.</p> <p>NZTA suggest the following addition be made to Section 5.1.2 of the ARCTMP,</p> <p><i>5.1.2 Construction Methodology</i></p> <p><i>The first stage of works will involve earthworks to enable widening of the carriageway. This may be undertaken in advance of the NZTA pavement surfacing season, September to March. No road sealing will occur during the cooler winter months, due to the cooler temperatures adversely impacting the quality of new seal.</i></p>	MGL	N/A	MGL agree to the proposed changes. The updated management plan will be refined and provided through the expert conferencing.
10	<p>Prior to any construction within the State Highway corridor, the Consent Holder is legally required under the Government Roding Powers Act 1989 to apply to the New Zealand Transport Agency for a Corridor Access Request and for that request to be approved. On this basis, NZTA suggest an advice note be included within the Consent Decision, should the Panel be minded to grant the application, to flag this requirement.</p>	Planning	N/A	MGL to continue engagement with NZTA on this point.
11	<p>MGL have applied for a Right-Of-Way concession-type from the Department of Conservation (DOC) to enable the upgrade of the SH8 / Ardour Road intersection, which will extend onto land to the north of the existing intersection that is part of the Ardour Road / Lindis River Conservation Area, Lower Lindis Conservation Area and Lindis River Marginal Strip. MGL have signalled an intention to transfer this concession to NZTA (noting there’s a separate concession that would be transferred to CODC) in the future. NZTA has not previously agreed to take a concession for this land, and nor is it our preference to take a concession for this land.</p>	Planning	N/A	<p>NZTA position acknowledged. The occupation of parts of public conservation land is primarily due to the Ardour Road / Lindis River and Lower Lindis Conservation Areas overlapping the existing SH8 and Ardour Road reserves.</p> <p>MGL to engage with Department of Conservation (administering agency for the underlying conservation land) and NZTA to resolve existing discrepancies relating to road alignments.</p>
12	<p>NZTA have reviewed the comments made by DOC in their s51(2)a FTAA Concessions Report, dated 25 March 2026. Our view aligns with DOC, in that NZTA is not in favour of the use of the land required for the intersection upgrade being secured through a concession. It is NZTA’s preference that we legally own the land upon which state highway assets are located, and not have the land be Public Conservation Land (PCL). That is, NZTA would want to have the land legally transferred to NZTA, such that NZTA</p>	Planning	N/A	See response to comment 11.

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	would legally own the land that the upgraded SH8 /Ardgour Road intersection would physically occupy. NZTA also consider that the risk and provision of exchange land to support a land transfer must sit with the developer.			
13	NZTA note that DOC has suggested a short-term easement could be granted to facilitate the proposed mine activity in the short term, should the Panel deciding this Application be minded to proceed with the concession approach. DOC has suggested amendments to the concession conditions proposed by the applicant (Appendix C of DOC's Report). NZTA agrees with the amendments proposed by DOC to the conditions in Table 3 (Appendix C of DOC's Report). But, for the avoidance of doubt, NZTA does not accept state highway road being on a concession.	Planning	N/A	See response to comment 11.
14	<p>If the concession application is to be advanced, NZTA suggests that the wording of the 'Concession Activity' in Clause 2, Schedule 1 of the document titled 'D.07A Concession and Conditions for SH8 and Ardgour Road 10 March 2026' in the Application, be amended to allow some degree of variation on the respective widths of the right turn bay and road shoulders, as may occur through the detailed design process. Presently the wording affords no flexibility, nominating a right turn bay width of 3.5m and a road shoulder width of 1.5m. NZTA suggests the following amendments:</p> <p>A concession (easement in favour of NZTA) for activities occurring on public conservation land within the underlying Ardgour Road / Lindis River and Lower Lindis Conservation Areas as follows:</p> <ul style="list-style-type: none"> > Safety improvement upgrades within the existing road reserve at the SH8 / Ardgour Road intersection, <u>which is likely to consist of includes:</u> > The formation of a 3.5 m wide right turn bay on SH8; > The reprofiling of the existing roadside safety barrier on Ardgour Road to follow the new road edge alignment; > The widening of the SH8 road carriageway and provision of 1.5 m wide road shoulders; and > New pavement marking and give way controls; and > All associated construction activities including the establishment of construction laydown areas, erosion and sediment control measures, any necessary culverts and temporary traffic management measures. 	Planning	N/A	See response to comment 11.
15	Page 6 of the memorandum document titled 'DOC Concession discussion – amendments to application' dated 10 March 2026, from Mitchell Daysh (on behalf of MGL) to the EPA) states that the line for demarcating the land subject to the concession that would be transferred to NZTA versus that of CODC, is described as follows: "The demarcation line is 20m east of the existing intersection 'limit line' (the latter being the give way lines that will be painted on Ardgour Road)." NZTA is of the	Planning	N/A	NZTA position acknowledged. MGL to clarify demarcations with NZTA.



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	view that the area for which NZTA should be responsible extends only 10 metres behind the Give Way limit lines and Application references, including to maps of the concession areas, should be amended accordingly.			
16	<p>NZTA appreciates the Applicant amending its Application to take into account the pre-application feedback NZTA provided.</p> <p>NZTA supports the intent of the proposed conditions that seek to manage effects of the BOGP on the state highway network, however, NZTA seeks that the Panel include the amendments and advice note sought by NZTA, as per above.</p> <p>NZTA welcomes further discussions with MGL and DOC regarding the SH8 /Ardgour Road intersection upgrade, including related consent conditions, as well as the matter of the concession/land transfer.</p>	MGL	<p>Substantive FTA Application:</p> <p>B.30 - Stantec New Zealand Limited – BOGP Integrated Transport Assessment (Sep 2025)</p> <p>D.07A - Concession and conditions for SH8 and Ardgour Road Intersection (Mar 2026)</p>	Comment acknowledged. See response to comment 11.

Comments from Aurora Energy

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1	Any electricity connection or network infrastructure required specifically to supply the BOGP would be funded by the project. The BOGP would be responsible for the full cost of its electricity connection and any associated network investment required to meet its demand. This ensures that no additional costs are incurred by existing electricity consumers as a result of the project.	MGL	N/A	MGL agrees with this comment.

Comments from Shine Irrigation Company Limited

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	Supports the project, noting no expected adverse effects on their irrigation scheme, and no concerns about noise, air quality, or landscape impacts given existing agricultural activity and prevailing winds.	N/A	N/A	MGL agrees and supports the comments made by Shine Irrigation Company.

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2	Requests firm and enforceable conditions to ensure water-quality protection and proper post-mining site management and restoration, given the proximity of their irrigation dams.	Planning	Substantive FTA Application: Part D – Proposed Approvals and Conditions.	MGL has drafted firm and enforceable conditions across the full range of disciplines which were submitted with the substantive application. These draft conditions will be further refined with input from agencies and the panel through the assessment process.
3	Notes a range of existing significant noise sources from agricultural activities including bird bangers on vineyards and orchards from January to April and air blowers spraying chemicals from October to April (pre-dawn). Notes irrigation company has not received complaints from these activities.	Planning	Substantive FTA Application: B.29 - Marshall Day Acoustics - Assessment of Noise and Vibration Effects (Marshall Day 2025)	MGL agrees and supports the comments made by Shine Irrigation Company. MGL's assessment of Noise and Vibration Effects found the effects from onsite activities will be minimal in the context of the existing rural residential noise environment and what can be reasonably anticipated by the District Plan permitted activity noise limits.
4	Supports increase in workers to the region noting the children of mine workers could be employed in local seasonal work.	N/A	Substantive FTA Application: B.01 - Benje Patterson (People and Places) – Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025)	MGL agrees and supports the comments made by Shine Irrigation Company. In particular, the BOGP will directly support an average of 351 staff a year, with potentially higher temporary peaks if a large amount of capital investment occurs within a short period of time. <ul style="list-style-type: none"> > On top of the jobs directly supported by the BOGP's mining operations, there are also employment multiplier effects that could accrue. For every direct job, there is the potential for a further 1.3 jobs to be created through multiplier channels. > Employment multipliers capture two effects: indirect employment (jobs created among suppliers from the BOGP's procurement) and induced employment (jobs created from providing goods and services to direct and indirect mine workers). > Indirect employment could potentially average 257 jobs on top of the 351 jobs directly at the BOGP, while the induced employment effect could add another 206 jobs.
5	Notes irrigation schemes have substantially changed the landscape of land adjacent to BOGP and surrounding landscape due to extensive cherry plantings with nets, windmills and centre pivot irrigators over the last forty years.	Landscape	N/A	MGL agrees and supports the comments made by Shine Irrigation Company.

Comments from Bendigo Terrace Farming limited Partnership

Comment Number	Comment	Applicant Technical Input	Where Addressed in the Application Documents	Response
1	Bendigo Terrace is concerned that the proposed Matakanui Gold groundwater abstraction may cause drawdown effects on Bendigo Terrace's nearby irrigation bores due to close proximity and abstraction from the same aquifer, noting all available irrigation supply is fully allocated on farm (no surplus) and critical to farm operations.	Hydrology	<p>Substantive FTA Application:</p> <p>B.02 - Kōmanawa Solutions Limited - Bendigo Groundwater Bore Take Effects Assessment (Kōmanawa 2025a)</p> <p>Response Evidence:</p> <p>Statement of Evidence of Jens Rekker</p>	<p>Responses have been made outlining the process of assessing drawdown transmitted through the Bendigo Aquifer and the magnitude of effect transmitted through the aquifer.</p> <p>Drawdowns with 365 days of MGL bore field pumping was estimated for the two closest and distant BTFLP bores as 0.61 and 0.41 metres, respectively. The short-and long-term drawdown effect of MGL's groundwater take on the Bendigo Aquifer and surrounding groundwater users is not assessed to be less than minor and less than seasonal water table fluctuation.</p>
2	Approximately half of Bendigo Terrace's irrigation supply is sourced from two high-production groundwater bores (90 L/s and 120 L/s) located near the proposed Matakanui Gold bore field, increasing sensitivity to any additional drawdown effects.	Hydrology	<p>Substantive FTA Application:</p> <p>B.02 - Kōmanawa Solutions Limited - Bendigo Groundwater Bore Take Effects Assessment (Kōmanawa 2025a)</p> <p>Response Evidence:</p> <p>Statement of Evidence of Jens Rekker</p>	Noted and referenced during the drawdown assessment process.
3	Bendigo Terrace notes that while bores within 1.2 km have been identified, detailed drawdown assessment has only been undertaken for two bores and considers that all potentially affected bores should be assessed in the same manner.	Hydrology	<p>Substantive FTA Application:</p> <p>B.02 - Kōmanawa Solutions Limited - Bendigo Groundwater Bore Take Effects Assessment (Kōmanawa 2025a)</p> <p>Response Evidence:</p> <p>Statement of Evidence of Jens Rekker</p>	Noted. The detailed assessments of other bores were feasible since full installation and operational details were available for those bores.
4	Bendigo Terrace acknowledges the high permeability and recharge of the Bendigo aquifer and considers the assessment methodology generally sound, while noting the need to manage effects on existing groundwater users.	Hydrology	<p>Substantive FTA Application:</p> <p>B.02 - Kōmanawa Solutions Limited - Bendigo Groundwater Bore Take Effects Assessment (Kōmanawa 2025a)</p> <p>Response Evidence:</p> <p>Statement of Evidence of Jens Rekker</p>	Noted. Response above is repeated.

Comments from Schoolhouse Terrace Services Company Ltd

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1	<p>Strongly opposed to the gold mine.</p> <p>Company holds consent to draw water to irrigate 90ha of vineyards at Bendigo. Relies entirely on the integrity and availability of the Bendigo aquifer.</p> <p>Company bore is in the Bendigo aquifer close to applicants proposed bore.</p>	N/A	N/A	MGL notes this comment.
2	<p>Impact on Existing Water Rights and Peak Flows: Concerned about the substantial volume of water required by the applicant (reportedly around 100l/s) and the lack of specific detail provided regarding peak flows. Without rigorous, transparent modelling, there is a significant risk that the applicant's extraction will negatively affect our ability to obtain the necessary water from Company's adjacent bore, particularly during peak summer demand.</p>	Hydrology	<p>Substantive FTA Application:</p> <p>B.02 Kōmanawa Solutions Limited - Bendigo Groundwater Bore Take Effects Assessment (Kōmanawa 2025a)</p>	<p>Rigorous, transparent assessment using the ORC mandated assessment calculation tool (Theis Equation) was used. Peak flows were specified and used in assessment calculations. Any granted groundwater take would be limited to 110 litres per second and 3,153,600 cubic metres per annum pumping and rate. Water metering that includes instantaneous, daily, weekly, monthly and yearly monitoring through a data telemetry link to ORC. Therefore, water metering will allow compliance to consent limits to be observed and enforced.</p>
3	<p>Recharge and Hydrological Integrity: The recharge of the Bendigo aquifer is, in part, fed by water running through and near the proposed mine site. This creates a two-fold risk: first, the high probability of the water picking up contaminants as it passes through a disturbed industrial site; and second, the risk of the mine works physically disturbing or diverting these natural flows, which are essential for the ongoing replenishment of the water table.</p>	Hydrology	<p>Substantive FTA Application:</p> <p>B.03 - Kōmanawa Solutions Limited - Groundwater Existing Environment and Effects Assessment (Kōmanawa 2025b)</p> <p>B.05 - Kōmanawa Solutions Limited - Groundwater Modelling Analysis for Mining Bendigo-Ophir Gold Deposit (Kōmanawa 2025d)</p>	<p>Scientific investigations supporting assessment of groundwater effects have defined the nature and quantities of creek and groundwater connections between the BOGP mine site as both flows and dissolved substances. STSCL's concerns are acknowledged and reassurance can be provided that the risks to the quantity and quality of groundwater available in the future, should applications be granted, will be low.</p>
4	<p>Unsustainable Resource Use and Precedence: The scale of the water requirement for the proposed mining operations is unsustainable. Established winegrowers who have relied on and made application for this water should have precedence over this resource</p>	Hydrology	<p>Substantive FTA Application:</p> <p>B.02 Kōmanawa Solutions Limited - Bendigo Groundwater Bore Take Effects Assessment (Kōmanawa 2025a)</p>	<p>Existing lawful users of groundwater are indeed given precedent over new applicants. This precedent includes that existing groundwater users with take resource consents have guaranteed continuing access to their water allocation as consent terms expire provided an application is lodged within 6 months of the expiry date. ORC estimated that three-quarters of the existing remaining groundwater allocation would still be available if the MGL applications are granted.</p>
5	<p>Risk of Aquifer and River Contamination: The proximity of the proposed mine site to the aquifer presents an unacceptable environmental risk. Particularly concerned about the potential for mine-polluted waters to impact the Rise and Shine Creek. This creek runs via the Bendigo Creek through the wine-growing area and eventually into the Clutha Mata-Au.</p>	<p>Hydrology</p> <p>Geochemistry</p>	<p>Substantive FTA Application:</p> <p>B.03 - Kōmanawa Solutions Limited - Groundwater Existing Environment and Effects Assessment (Kōmanawa 2025b)</p> <p>B.05 - Kōmanawa Solutions Limited - Groundwater Modelling Analysis for Mining</p>	<p>Scientific investigations supporting assessment of groundwater effects have defined the nature and quantities of creek and groundwater connections between the BOGP mine site as both flows and dissolved substances. STSCL's concerns are acknowledged and reassurance can be provided that the risks to the quantity and quality of groundwater available in the future, should applications be granted, will be low.</p>



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			Bendigo-Ophir Gold Deposit (Kōmanawa 2025d)	
6	Cumulative Environmental Impact and Future Expansion: The applicant has stated plans to explore land adjacent to the current application. If successful, this expansion—and the potential for subsequent mines—will add further cumulative risk to water availability and the long-term integrity of the aquifer.	Planning	N/A	The Substantive Application only seeks to authorise the activities currently being sought. MGL notes that any exploration activities will be limited to the BOGP Consent Area which is shown on Map C.03 <i>BOGP Consent Area</i> . Any necessary approvals to authorise exploration activities in this area have been applied for under this application. Any further exploration activities will be subject to a future approvals process.
7	Applicant's Lack of Experience: Matakanui Gold Ltd has no history of operating a mine of this scale. This lack of experience is of concern because it reduces our confidence that the applicant will be capable of following the consent requirements necessary to protect the water supply in perpetuity. The applicant's failure to obtain the necessary consents for workshops on Bendigo Loop Road and more recently for the tower installed at the top of Battery Hill supports concerns that the company may not follow best practice all the time for the life of the project.	Legal	Response Evidence: Legal Submissions, 17 April 2026 at "Matters Not Relevant to Panel's Consideration"	Not relevant to the Panel's consideration of the application.
8	Reputational and "Bendigo" Brand Impact: Company shareholders rely on the "100% Pure" image of the wider Central Otago region to market fine wine. The company grows wine and operates tasting rooms and restaurants across multiple locations worldwide. Heavy industrial mining in close proximity to where the wines are grown is not compatible with marketing fine wine. The incompatibility and scale of the proposal at Bendigo will permanently damage the reputation of wines grown at Bendigo with international consequences	N/A	N/A	Not accepted. Such indirect effects are not anticipated if the BOGP is operating within the conditions of its approvals.
9	The Fast-Track process should not come at the expense of existing consent holders or the fundamental protection of vital water resources. The company does not believe this mining project is compatible with the current and future Bendigo-based wine industry. Schoolhouse Terrace Services Company Limited requests that this application be declined to ensure the security of water supply and the environmental safety of the region. We thank the panel for considering our concerns	Planning	N/A	Not accepted. Such indirect effects are not anticipated if the BOGP is operating within the conditions of its approvals.
10	The director's sought an opinion from a local mining consultant, Chris Goddard. Mr Goddard highlights several areas where the applicant's approach to mine safety and performance further reinforces concerns that the applicant lacks the required experience to manage the site adequately. Mr Goddard's statement was appended to the submission. It provided information on Mr Goddard's	MGL	N/A	The submission of C Goddard is acknowledged. Mining operations will be occurring under the MOQO Regulations 2016, which require appointments of suitably qualified and experienced personnel to Safety Critical roles as defined by the MOQO Regs. The key appointments have been made under the MOQO Regs, and the



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	background and experience, including warehouse and logistics for Australian mines and 15 years mining health and safety and contractor management. Mr Goddard's statement is summarised below.			development of a health & safety management system in compliance with the HSaW Act & Regs is well advanced. The MOQO Regs further require the identification of Principal Hazards and the development of Management Plans to control those hazards.
11	Most high risk work will be performed by contractors (drill and blast, earthworks inbound logistics). No information provided on MGL's past performance, audits, stop work authorities, escalation processes. No information on standards and policies for inbound logistics Chain of Responsibility. Technical report B1 describes who would be involved, hazard management includes references only to work on site.	MGL	N/A	MGL is intending to self-perform the significant works of construction, ongoing mining (including drilling & blasting) and processing. Site supply logistics will be undertaken by key suppliers directly, or national level transport companies under contract. High hazard consumables such as Class 1, Class 3 & Class 6 will be delivered by the manufacturers with appropriate licensing and security of supply fully compliant with NZ legislative requirements. The materials to be delivered are routinely used within the NZ mining industry and have been safely transported and used for more than 30 years.
12	Desktop audit of application showed lack of: <ul style="list-style-type: none"> > 2020-2025 operational systems for drilling program and future operations > Internationally recognised supply chain accountability frameworks > Detail on roles and accountabilities > Detail on the interface risks between contractors and the operator and simultaneous contractor fronts > Detail on contractor prequalification standards 	MGL	N/A	MGL has a Contractor Management system, and safety systems compliant with the HSaW Act & MOQO Regs that will apply. These include specific appointments of responsible persons.
13	Recommendations for the panel to consider: <ul style="list-style-type: none"> > Require applicant to adopt and implement a Chain of Responsibility framework for all transport and logistics activities > Review 2020-2025 contractor performance to inform future operational performance including AIFIR, critical risk reporting, regulatory compliance of contractors, results of contractor audits, pre-qualification audits of contractors prior to award > Requiring a contractor management system be implemented with clear accountabilities for each line leader role with a single experienced accountable senior leader. 	MGL	N/A	MGL considers these matters are fully accounted for within MGL health & safety management system, incorporating contractor management.

