

## 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** responding to Minute 47

Dated: 28 August 2026

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## **MAY IT PLEASE THE EXPERT PANEL**

1. This Memorandum of Counsel is filed on behalf of Matakanui Gold Limited (**Matakanui Gold**) in response to Minute 47 of the Expert Panel.
2. In its directions in Minute 47 the Expert Panel directed that parties may respond to the water related draft conditions by 7 September 2026. Matakanui Gold is then to provide a response by 14 September 2026.
3. Condition workshopping between the expert planners concluded on 27 August 2026. During the final workshop sessions, it became apparent that it would be beneficial for the parties and ultimately the Expert Panel to receive feedback on the full suite of conditions and approvals that Matakanui Gold is circulating to the Expert Panel and parties on 28 August 2026.
4. To provide for this, Matakanui Gold respectfully seeks the following targeted amendments to the Expert Panel's directions in Minute 47:
  - (a) On 7 September 2026 the parties/invitees (voluntarily) provide their response to Matakanui Gold's response to Request for Information 11 together with their response to the conditions, approvals and the Heritage and Archaeological Management Plan to be circulated on 28 August 2026.
  - (b) On 14 September 2026 Matakanui Gold files a final set of conditions and management plans following consideration of the feedback received from the parties on 7 September 2026.
5. Matakanui Gold does not seek any other amendments to the directions in Minute 47.
6. In accordance with Minute 47, the workshopped conditions and the Heritage and Archaeological Management Plan will be filed with the Expert Panel this afternoon.

**Dated** 28 August 2026



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