

1. INTRODUCTION

1.1 BACKGROUND

Matakanui Gold Limited (“**MGL**” or “**the company**”) is proposing to establish a new gold mining operation called the Bendigo-Ophir Gold Project (“**BOGP**” or “**the project**”) on the Bendigo and Ardgour Stations in the Dunstan Mountains of Central Otago, located approximately 20 km north of Cromwell. This application by MGL, which is made under the Fast-track Approvals Act 2024 (“**the Act**” or “**fast-track**”) seeks to authorise the integrated development of four identified gold deposits - through the establishment of staged open pits and an underground mine - together with a modern gold processing plant and associated infrastructure and ancillary activities.

The four identified gold deposits are known as Rise and Shine (“**RAS**”), Come in Time (“**CIT**”), Srex (“**SRX**”) and Srex East (“**SRE**”), with the RAS deposit alone being the largest single new gold discovery in New Zealand in over four decades.

The proposed mining activities within the Project Site are located within the semi-arid high-country area in the Dunstan Mountains within the privately-owned pastoral lands of the Bendigo Station and Ardgour Station, with supportive landowner access agreements and associated compensation agreements in place. Historically, this area has been subjected to alluvial, eluvial and hard-rock gold mining, however over the last 100 years the land has been extensively grazed with sheep and cattle as part of the farming operations. Additional supporting infrastructure such as offices, parking and an electrical substation are proposed to be located on the adjoining Bendigo / Ardgour terraces which are generally comprised of horticultural and agricultural activities.

The BOGP is situated within the Central Otago District and the wider Otago Region.

The general location of the BOGP is shown in Figure 1-1 below.



Figure 1-1: General Location of the Bendigo-Ophir Gold Project



Having been confirmed as a listed project in Schedule 2 of the Act, MGL is applying for all necessary approvals for the construction, operation, maintenance, rehabilitation and closure of the BOGP. The required approvals include, but are not necessarily limited to, the following:

- > Resource consents that would otherwise be applied for under the Resource Management Act 1991 (“**RMA**”);
- > Multiple concessions that would otherwise be applied for under the Conservation Act 1987 (“**Conservation Act**”);
- > An amendment to a conservation covenant that would otherwise be applied for under the Reserves Act 1977 (“**Reserves Act**”);
- > Authorities that would otherwise be applied for under the Wildlife Act 1953 (“**Wildlife Act**”);
- > An Authority that would otherwise be applied for under the Heritage New Zealand Pouhere Taonga Act 2014 (“**HNZPT Act**”); and
- > Approvals that would otherwise be applied for under the Freshwater Fisheries Regulations 1983 (“**Fisheries Regulations**”).

It is noted however, that MGL has submitted a separate application for the necessary mining permit(s)¹ for the BOGP under the Crown Minerals Act 1991 (“**Crown Minerals Act**”) outside of the fast-track process. The mineral mining permit application seeks authority to exploit the RAS, CIT, SRX and SRE gold deposits - and likely extensions of the known gold deposits - which have defined mineral resource estimates within the Project Site and surrounding area.

The proposed BOGP sits within MGL’s permitted mining tenure area which covers an area of approximately 292 km² and is comprised of:

- > Mineral Exploration Permit 60311 (“**MEP60311**”); and
- > Mineral Prospecting Permit 60882 (“**MPP60882**”).

This tenure was granted by the New Zealand Government and is regulated by the New Zealand Petroleum and Minerals division of the Ministry of Business, Innovation & Employment (“**MBIE**”). This permitted mining tenure area will also include the area authorised by the mining permit once granted. Further details on the existing permits that comprise this area are provided in section 2 of this report, with copies of the documents outlined above provided in **Part E** of these application documents.

¹ Mineral Mining Permit Application 61326 (MMPA61326).

The permitted mining tenure area for the BOGP is shown in Figure 1-2 below, with the Project Site for the BOGP shown in black hatching within MEP60311.



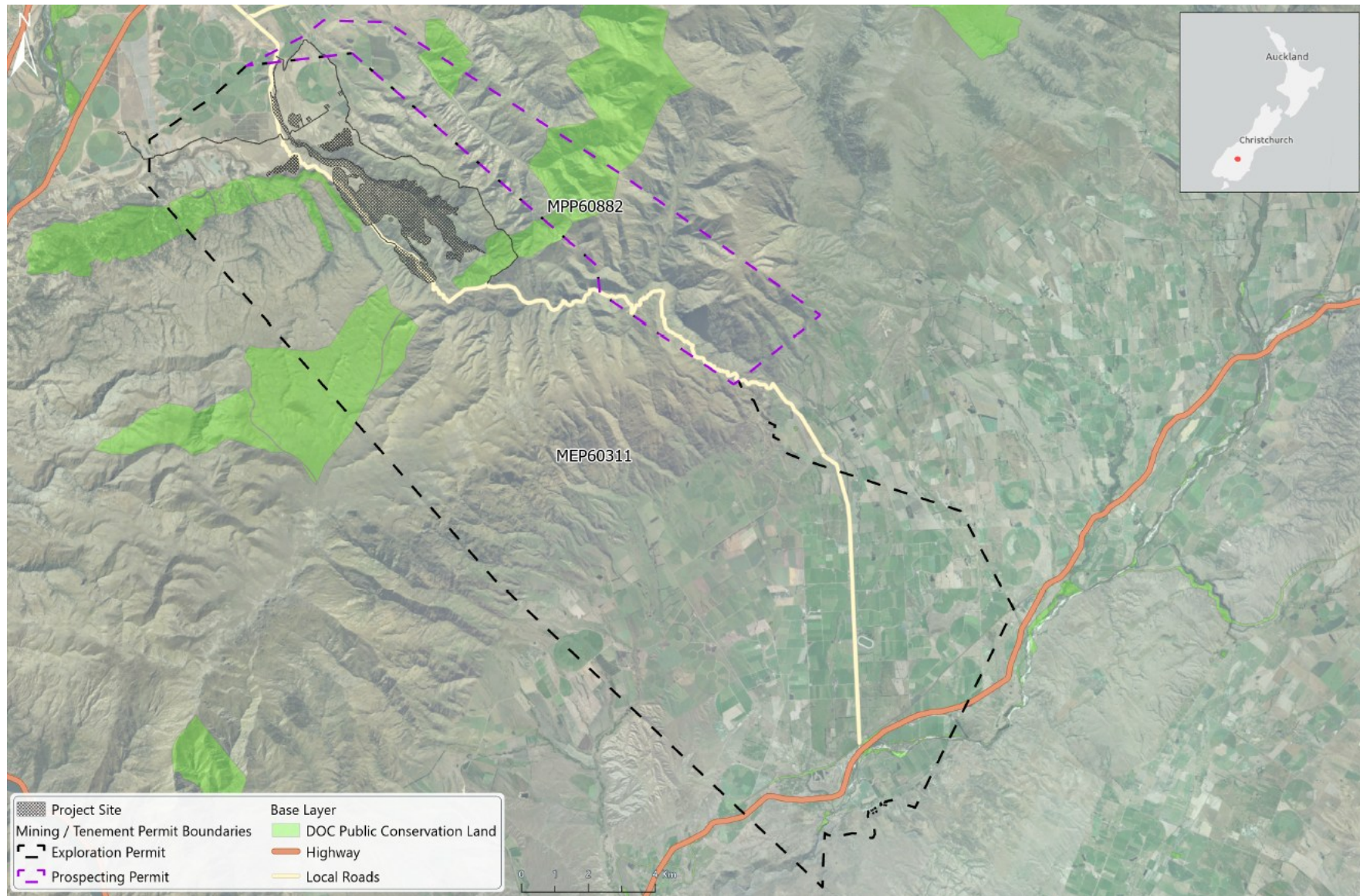


Figure 1-2: Permitted Mining Tenure Area for Matakanui Gold Limited



MGL has made a substantial investment in exploration of over \$60 million to grow the discovered total gold resource at the BOGP to 2.3 million ounces of gold. This effort has enabled **the RAS deposit alone to become the largest single new gold discovery in New Zealand in over four decades**. Whilst new, it only expands on the substantial gold mining history of the Otago Goldfields which has a globally significant production history of over 13 million ounces of gold since 1861. A large percentage of this gold output came from the alluvial deposits within the Clutha River / Mata-au and Kawarau River. These deposits alone gave rise to population growth and economic development for the town of Cromwell and the surrounding region and stand as testament to the sustainable outcomes of historic gold exploration and production. The Otago Region has continued to reap the economic benefits of mining in recent years, with the nearby Macraes Mine generating significant gross domestic product (“**GDP**”) and direct and indirect employment opportunities for the region.² The Macraes Mine has now sustained 35 years of mining operations with at least another decade of mining planned. The discovery of the RAS deposit has confirmed that the Otago Goldfields has been a sleeping giant in that Macraes, as a world class deposit, is not alone. This has triggered an influx of overseas exploration funds from other explorers recognising that there are potentially more world class deposits to find.

The proposed BOGP will commence with an approximately 14 year mine life. It will generate substantial economic outputs, employment and consequential growth outcomes for the Central Otago District, the wider Otago Region and the New Zealand economy overall.

The Board of Directors and management team of MGL have extensive international and local experience in the development of mining operations. The proposed new infrastructure will benefit from the application of modern and technically advanced commercial processing and mine implementation practices, as well as from leading standards of progressive mine rehabilitation and management of environmental effects. This includes the proven practice of detoxification of the processed ore to reduce residual cyanide levels to international guidelines and precipitation of dissolved arsenic to a stable permanent and safe form.

1.2 BENDIGO-OPHIR GOLD PROJECT OVERVIEW

As noted, the BOGP involves mining of the four identified gold deposits (RAS, CIT, SRX and SRE). The resources will be mined by open pit methods at each of the deposits within the Project Site, with underground mining methods also proposed to be utilised at RAS to access the deeper gold deposits. The mining activities and much of the ancillary facilities and associated infrastructure will be located within the Shepherds and Rise and Shine

² The Macraes Mine is located approximately 90 km southeast of the project site and owned and operated by OceanaGold Corporation.

Valleys in the wider Dunstan Mountains, with additional supporting infrastructure located on the adjoining Bendigo / Ardgour terraces.

Whilst the Project Site is located on the Bendigo and Ardgour Stations, the Project is also located adjacent to, and in some cases intersects, land administered by the Department of Conservation. This includes the Bendigo Historic Reserve and the Bendigo and Ardgour Conservation Areas, noting that no mining operations are proposed within these areas. In addition, part of the Project Site within Bendigo Station is subject to the Bendigo Conservation Covenant under Section 77 of the Reserves Act.

While a full description of the various activities that comprise the construction, operation, maintenance, rehabilitation and closure of the BOGP is provided in section 3 of this report, the project is made up of the following key activities:

- > The staged establishment of the RAS Open Pit and Underground Mine, and SRX Open Pit, which will remain as pit lakes at closure;
- > The establishment of the CIT Open Pit, which will be progressively backfilled with waste rock from the RAS Open Pit and rehabilitated at the completion of mining activities;
- > The establishment of the SRE Open Pit, which will be progressively backfilled with waste rock before becoming an engineered landform for the adjoining SRX Open Pit;
- > The establishment of an engineered Tailings Storage Facility (“**TSF**”) in the upper reach of Shepherds Valley (including a seepage collection sump), which will utilise overburden waste rock from the development of the RAS Open Pit and be buttressed by the Shepherds Engineered Landform (“**ELF**”) described below;
- > The establishment of three ELF’s to permanently store overburden waste rock, being the Shepherds ELF, SRX ELF and Western ELF;
- > A conventional hard-rock gold processing plant in the lower reach of Shepherds Valley, along with associated infrastructure and ancillary activities. This includes the establishment of the all-purpose Shepherds Service Corridor and the realignment of Shepherds Creek to form the Shepherds Stream Diversion (as part of wider stream diversion activities);
- > The establishment of temporary topsoil, vegetation and brown rock stockpiles around the Project Site;
- > The taking of groundwater from the Bendigo Aquifer via a lawfully established bore and a proposed new bore for use in mining-related activities (and to supplement flows in Shepherds Creek, Rise and Shine Creek and wetlands). Water will be conveyed to the processing plant via a pipeline over a distance of approximately 6.5 km;

- > The establishment of the Shepherds Silt Pond at the base of the Shepherds ELF and water storage tank(s) for use at the processing plant and dust suppression;
- > The establishment of supporting infrastructure within the Project Site, such as the upgrade of Ardgour Road and the upgrade and realignment of Thomson Gorge Road to provide improved access to the BOGP, internal mine access and haul roads, water pipelines and underground utilities, and electricity supply to the Project Site from Lindis Crossing and Matilda Rise;
- > The proposed closure of parts of Thomson Gorge Road, and the closure of the Paper Road in the lower Shepherds Valley for mining operations and rehabilitation activities;
- > Fenced and secured explosives magazines and explosive emulsion mixing facilities (located outside the mining operations area on the Bendigo / Ardgour terrace);
- > The establishment of supporting infrastructure associated with the BOGP on the Bendigo / Ardgour terraces, including temporary construction workers accommodation, administration offices, general security buildings, first aid, a geology complex (including a core and sample storage area, offices and analytical laboratory), carparks, waste management areas, contractor laydown yards and a substation;
- > The establishment of workshops and temporary equipment servicing infrastructure within the lower Shepherds Valley and on the Shepherds ELF;
- > The establishment of two aggregate pits on agricultural land on the Bendigo / Ardgour terraces to be operated intermittently over the life of the project to provide construction and road sheeting materials for onsite use;
- > While there are no proposed mining activities on the adjoining public conservation land, the following activities will be undertaken to maintain and / or improve public access and amenity:
 - > The establishment of Ardgour Rise across the Ardgour Station to provide public access between the Bendigo / Ardgour terraces and Thomsons Saddle;
 - > The establishment of a replacement walking route to provide access to the historic Come-in-Time Battery;
 - > Upgrades to the intersection of SH8 and Ardgour Road to provide safe and appropriate access to the Project Site whilst appropriately managing effects on the wider transport network;
 - > Crack willow management activities within the Bendigo and Clearwater Creeks; and
 - > All necessary activities that are ancillary to those listed above;

- > The damming, diverting and reclamation of watercourses and the establishment of various clean water and dirty water (i.e. sediment laden) diversion channels around mine components. This includes the establishment of various permanent rehabilitated stream diversions within the Shepherds and Rise and Shine Creeks;
- > The salvage of lizards and terrestrial invertebrates from the project site and their release into areas within the surrounding BOGP Area;
- > Ecological restoration and habitat enhancement activities within the Project Site and surrounding BOGP Area, including the establishment of two predator-exclusion fenced sanctuary areas; and
- > The undertaking of mine remediation and closure activities.

In addition to the above, mineral exploration activities are proposed to be undertaken within the Project Site and the surrounding area (including earthworks for exploration purposes).

The activities associated with the BOGP, and outlined above, are proposed to be located within the following two distinct areas:

- > The “Project Site” mean the areas identified on **Figure 1-3: Project Site - Layout of the Bendigo-Ophir Gold Project** covering 568 hectares. The project site includes:
 - > The areas within which mining operations will occur including open pits, an underground mine, the TSF, ELFs, processing plant, haul roads and supporting / ancillary activities and infrastructure;
 - > Two bores on the Bendigo Terrace and associated pipelines for the supply of fresh water;
 - > An upgrade to the intersection of SH8 and Ardgour Road; and
 - > The construction of Ardgour Rise – a new road to maintain public access between Ardgour Terrace and Thomsons Saddle.
- > The “BOGP Consent Area” means the entire Bendigo-Ophir Gold Project including exploration activities, mining operations within the Project Site, and all associated ancillary, monitoring, mitigation, off-setting and compensation activities and supporting infrastructure and activities within, and in the vicinity of, the Project Site as shown on **Figure 1-4: Extent of the BOGP Consent Area**. For the avoidance of doubt, the BOGP Consent Area includes the areas that are the subject of Concessions within Public Conservation Land.

The Project Site associated with the establishment, operation, then rehabilitation and closure of the BOGP is shown in Figure 1-3 below, with the extent of the wider BOGP Area shown in Figure 1-4 below.

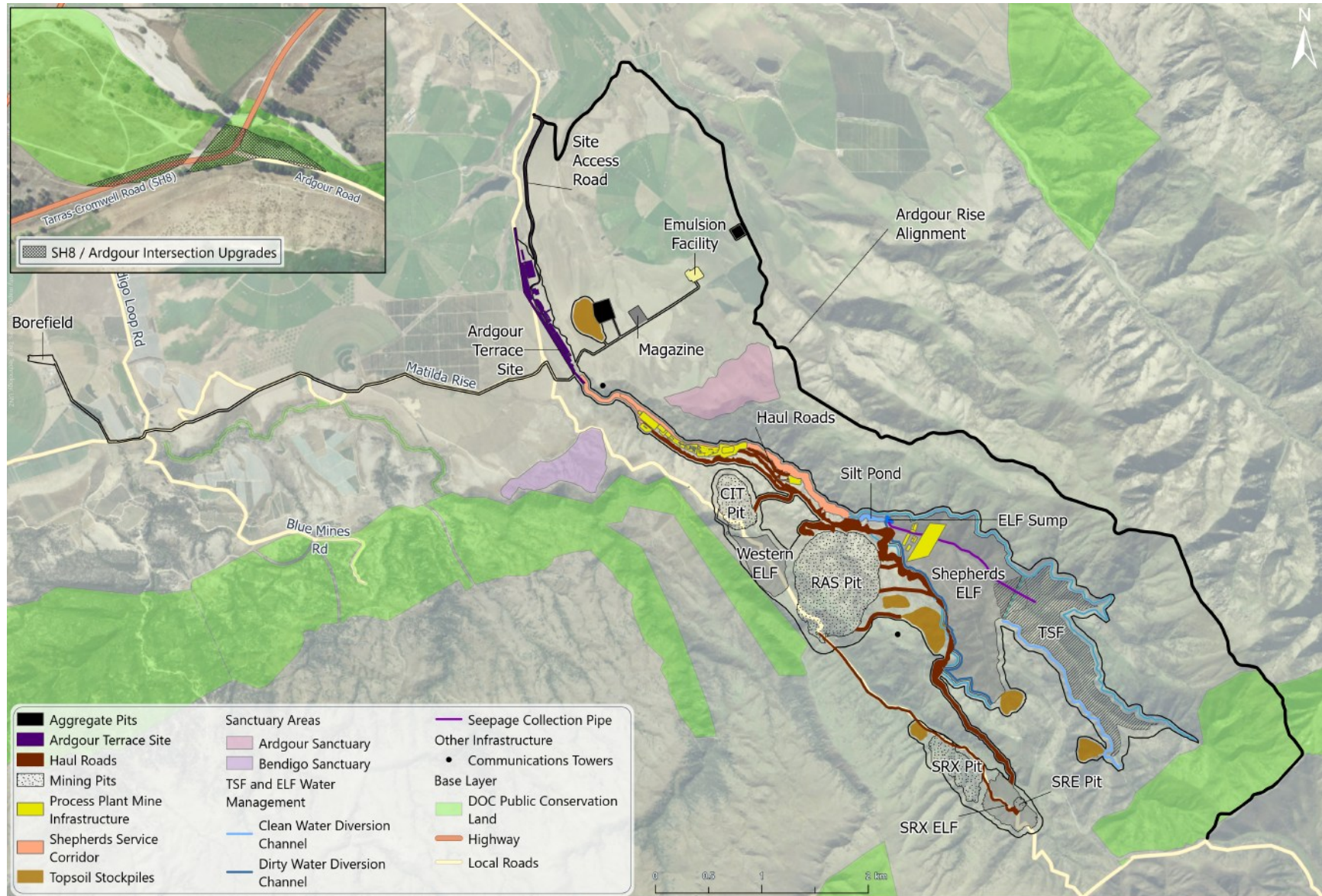


Figure 1-3: Project Site - Layout of the Bendigo-Ophir Gold Project



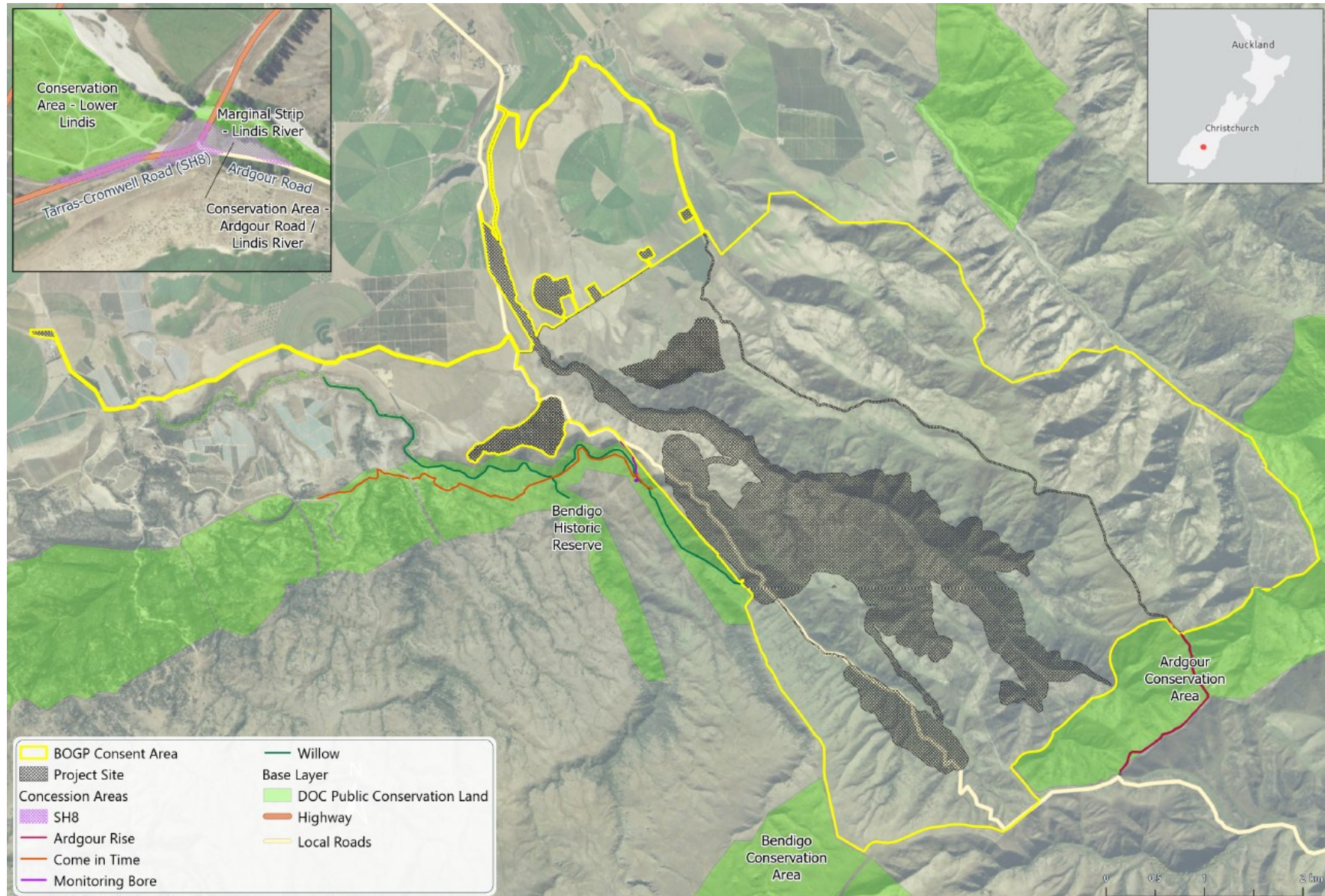


Figure 1-4: Extent of the BOGP Consent Area



In addition, MGL has submitted two resource consent applications³ to Central Otago District Council (“**CODC**”) concurrently with this substantive application for land use consents for several components of the BOGP outlined above. These activities - referred to as “**early works**” - seek to enable the early construction of support facilities and enable the timely initiation of the wider project following the granting of all necessary approvals and authorisations under the Act through this substantive application. While a more fulsome description is provided in Section 3.4 of this report, these early works generally relate to earthworks for roading upgrades and the establishment of various ancillary and supporting activities on the Bendigo / Ardgour terraces. A copy of the resource consent application documents for the early works is provided in **Part J** of these application documents.

For clarity, the activities of the BOGP which are covered by the early works application (described above) are also sought to be authorised through this substantive application. As required by section 94 of the Act, if that early works consent application has not been granted by the date of lodgement, the early works application will be withdrawn once MGL is notified by the Environmental Protection Authority (“**EPA**”) that this substantive application has been accepted.

1.3 MINING HISTORY AND SIGNIFICANCE OF THE NEW DISCOVERIES

Gold mining has been a part of the Otago Region since the gold rush in the 1860s that brought the Otago Goldfields to world prominence. That rush generated substantial population growth and economic input and output to the region, and the sustainability of this pulse in population and industrialisation remains evident today. This is demonstrated by the heritage sites and numerous gold mining-related tourism activities in the region, and the growth of industry that started with mining now evolving into a major hub for tourism, agricultural, horticultural, building and service industries.

More than 13 million ounces of gold has been recovered from the Otago Goldfields. The majority was recovered from alluvial and eluvial sluicing type operations, specifically from the Clutha / Mata-Au, Kawarau and Shotover Rivers and tributaries, which produced over 8 million ounces of gold. The visual impacts of these sluicing operations are largely hidden by the damming of the Clutha River / Mata-Au to form Lake Dunstan, and with it, the major hydroelectric power schemes that service the growing communities and industry in the South Island and New Zealand more broadly.

³ Resource Consent Numbers RC250126 and RC250248.



In the last few decades, hard-rock exploration has discovered primary gold mineralisation that has led to another 5 million-plus ounces of hard-rock gold won from industrial-type mining operations such as is proposed at the BOGP.

At a more local scale, the proposed BOGP is located within the Bendigo area, approximately 20 km north of Cromwell. The area was named in the 1860s by gold miners coming from the Bendigo goldfields in Victoria, Australia. Similarly, it was the discovery of gold at Bendigo and Ballarat in Victoria in the 1850s that spawned population growth in Victoria, and reflectively the major cities of Ballarat, Bendigo and Melbourne.

Gold mining in the Bendigo area in New Zealand began in 1862 with alluvial mining of terrace gravels, followed in 1869 by the hard-rock mining of 'quartz reefs'. The Bendigo area has a rich gold endowment, with approximately 300,000 ounces of gold produced up until the 1940s from the Bendigo lodes of the Bendigo Goldfields. The towns of Cromwell, Clyde and Alexandra were established as a result of this early gold rush. Hard-rock mining transformed the area (with mine shafts located throughout the region), and New Zealand became a global epicentre for dredging during the late 1800s and early 1900s, with the Clutha River / Mata-Au home to a vast number of dredges. Areas of dredge tailings within the Clutha River / Mata-Au bed were subsequently flooded following the creation of Lake Dunstan.

Regarding the proposed BOGP, the Project Site contains four discrete mineral deposits at RAS, CIT, SRX and SRE. Santana Minerals Limited (the parent company of MGL – refer to Section 1.5 of this report) has undertaken a mineral resource estimate for the BOGP and declared **RAS to be the most significant single gold discovery in New Zealand in four decades with 2.1 million ounces of gold identified at 2.4 grams per tonne ("g/t")**. Whilst hard-rock exploration remains in its infancy in the region, the initial commercialisation of the discovery is economically justified. Similarly, the BOGP is expected to spawn a further pulse of substantial economic output, industrial growth and employment in the Central Otago District and Otago Region.

Gold is one of the main drivers of economic activity for the minerals sector in New Zealand. Gold has been the backbone of many of the world's currencies for centuries, serving as a universal form of payment and store of value. While it has a traditional application in jewellery it is increasingly essential to the renewable electricity and transport sectors, life-saving medical devices and various other technologies (including cell phones and computers).

The BOGP will make an important contribution to meeting the New Zealand Government's goal of doubling the value of New Zealand's mineral exports to \$3 billion by 2035,⁴ and will bring significant economic benefits to the surrounding community.

In addition, the importance of the BOGP is further enhanced because gold is now nominated and recognised as a critical mineral⁵ and the New Zealand Government is committed to exploring strategic pathways and wider system settings to support the development and supply of critical minerals that can be produced in New Zealand.

1.4 THE PURPOSE OF THE FAST-TRACK APPROVALS ACT

The purpose of the Act is:

to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

The proposed BOGP demonstrably achieves the purpose of the Act by delivering significant benefits to the Central Otago District, the Otago Region and New Zealand more broadly.

It is noted the broader BOGP remains in its infancy from a hard-rock exploration perspective, with the current pre-feasibility study⁶ that informs this substantive application only considering ore mineralisation that is categorised as 'Indicated Mineral Resource' in accordance with the internationally accepted code of practice for public reporting of minerals exploration results, mineral resources and ore reserves.⁷ While this underwrites a recoverable reserve of 1.25 million ounces over an approximately 14 year mine life for this substantive application, the BOGP currently has a 'Total Mineral Resource' estimate of 2.34 million ounces of gold.

The proposed gold mining operations for the BOGP will provide the following economic benefits to the regional and national economy, by:

- > **Generating a significant contribution to the GDP of Central Otago and New Zealand:**
Based on current prevailing gold prices and cost estimates when the Updated Pre-Feasibility Study was published, the BOGP is projected to generate a cumulative total of approximately \$5.8 billion dollars of GDP over the course of the currently defined mine

⁴ A Mineral Strategy for New Zealand, MBIE, January 2025.

⁵ A Critical Minerals List for New Zealand, Ministry of Business, Innovation & Employment ("MBIE"), January 2025.

⁶ *Memo - Economic impacts of the Bendigo-Ophir Gold Project updated for Pre-Feasibility Study - June 2025* which supersedes values in the *Bendigo-Ophir Gold Project Pre-Feasibility Study* dated 15 November 2024, which was released by Santana Minerals to the Australian Stock Exchange in November 2024.

⁷ The Australian Joint Ore Reserves Committee (JORC) code, 2012.



life.⁸ The project is expected to directly add \$360 million of GDP to the New Zealand economy per year over the initial mine life of 13.8 years. In addition, the procurement of goods and services associated with the BOGP has the potential to add a further:

- > \$25 million of indirect GDP per year in Inland Otago; and
- > \$59 million of indirect GDP per year across the rest of New Zealand.
- > **Generating substantial revenue for the New Zealand Government:** The BOGP is expected to generate a total of \$1.8 billion dollars of revenue for the New Zealand Government via royalties, corporate taxes, PAYE and ACC payments.
- > **Generating substantial foreign investment as one of the largest funded projects in New Zealand's infrastructure pipeline:** The BOGP is expected to generate approximately \$533 million dollars of capital investment, with over half this investment required in order to commence gold production in the first two years of the project. For context:
 - > Foreign direct investment in New Zealand for the year to September 2024 was \$4.1 billion;
 - > The average investment made under the Overseas Investment Office regime in 2024 was \$6.4 million;
 - > There are just 11 funded \$1 billion plus projects in the New Zealand infrastructure pipeline today; and
 - > The importance of the BOGP is further enhanced with gold now being recognised as a critical mineral, leading to the New Zealand Government being committed to exploring strategic pathways and wider system settings to support the development and supply of gold that can be produced in New Zealand.⁹
- > **Supporting a wide range of highly paid (over \$100,000 per annum) jobs:** The BOGP development plan estimates an average of 351 FTE jobs per year, with a peak of 506 jobs in Year 1 of gold production as construction activities are completed and operations begin. In addition:
 - > For each worker directly employed at the BOGP, there is the potential for a further 1.3 jobs to be created through the multiplier effect by providing goods and services to meet the needs of the workforce. This could include an average of 257 jobs

⁸ The Economics Assessment (Benje Patterson (2025)) estimates that the BOGP will generate a cumulative total of \$5.8 billion dollars of GDP over the course of the mine life based on gold prices at February 2025. The \$5.3 billion dollar figure in this report is based on updated gold prices at the time of writing in early June 2025.

⁹ A Critical Minerals List for New Zealand, MBIE, January 2025.



created amongst suppliers and up to 206 jobs created from providing goods and services to meet the needs of these mine workers;

- > The BOGP is estimated to contribute approximately \$1 million of GDP per worker, which is 7.7 times higher than the current average productivity across Inland Otago; and
- > The average annual salary for workers employed at the BOGP is estimated to be approximately \$140,000 per annum, which is 104% higher than the average wage of inland Otago in 2024.

The economic benefits of the BOGP have been assessed and quantified further in an economic assessment by Benje Patterson (2025), provided in **Part B** of these application documents. These benefits of the BOGP are discussed further in Section 6.2 of this report.

In addition to the substantial economic benefits generated by the project, as part of the proposed approach to managing the actual and potential effects of the BOGP, ecological improvements will be generated within the Central Otago District as a result of the extensive offsetting and compensation measures proposed across over 2,000 hectares of land surrounding the project. This will result in net gain outcomes for various indigenous terrestrial and wetland biodiversity values within 35 years from the granting of approvals. The ecological benefits of the BOGP have been assessed and quantified by a range of ecological experts, as provided in the technical assessments provided in **Part B** of these application documents. It is acknowledged that the BOGP will have adverse effects on some terrestrial ecological values and, in that regard, measures have been proposed to mitigate, compensate or offset those effects (discussed in more detail in Section 1.6).

The commissioning of the extensive suite of ecological reports for the project by MGL has also resulted in a significant increase in the understanding and knowledge of the existing baseline ecological values of the Project Site and wider Dunstan Ecological District. These baseline studies far outweigh the efforts and intensity of any competing land use and / or other industrial development in the region, particularly compared to the minimal baseline ecology studies completed over the last 100 years within the Project Site while it has become a highly modified environment used for sheep and cattle grazing.

The Act is designed to provide for an omnibus approvals process for significant proposals, primarily to minimise delays and costs associated with the need to obtain separate and / or sequential approvals from different agencies under different statutory regimes. Given the diversity of assessments needed for the BOGP and its requirement for approvals under a range of statutes and from a variety of regulatory authorities, it is an ideal project for processing under the Act.



1.5 MATAKANUI GOLD LIMITED

MGL is a New Zealand registered company and is a wholly owned subsidiary of Santana Minerals Limited (“**Santana Minerals**”), an Australian-registered company. Santana Minerals is a publicly listed company on both the Australian Securities Exchange and New Zealand Securities Exchange and is listed under “SMI”. Santana Minerals engages in the exploration and evaluation of gold, silver and base metal properties in New Zealand. In September 2025, nearly 15,000 or 85% of shareholders were New Zealand residents, owning about 43% of the company.

Santana Minerals purchased MGL in 2020, which had the exploration permits at Bendigo-Ophir. Since then, MGL has carried out extensive drilling and research within the Project Site. MGL’s goal is to develop the BOGP into a world class, long life, environmentally responsible mining project that will bring employment and prosperity to the Central Otago District and the wider Otago Region.

MGL owns all the relevant mineral permits for the BOGP and will be the operating subsidiary of Santana Minerals with all revenue, profits and tax remaining and pertaining to a 100% New Zealand-owned company. Expenditure on the project since MGL was incorporated in 2016 exceeds \$60 million. The Company currently employs over 50 staff and contractors.

Santana Minerals, and MGL locally, seek to be a leader in gold exploration and mining, adopting responsible practices to unlock the sustainable value of New Zealand’s precious resources. MGL proposes to do this while maintaining their four values;

- > Stewardship – stewards of the environment;
- > Respect – respecting communities;
- > Commitment – execute with passion and purpose; and
- > Prosperity – enriching all stakeholders.

Santana Minerals already supports a range of community initiatives in Central Otago through partnerships, sponsorships and learning opportunities. This includes sponsoring community events such as Light Up Cromwell and the Santana Central Otago Football League, and \$60,000 to support Otago Goldfields Heritage Trust to host the 2026 World Gold panning Championships in Cromwell. In addition, financial support for the construction of a new community hub in Omakau has been provided.

The Santana Central Otago Football League operates as an independent league which hosts sixteen teams from the Central Otago region. These teams actively engage with recognised seasonal workers in other industries, representing over twenty different nationalities.



The league serves as a community hub for seasonal workers, providing a space where they can socialise and connect with others from their home countries. The league has been running for 17 years, and Santana has facilitated the live streaming of football games for worker families to watch the games from their home countries.

In addition, Santana Minerals offers assistance for apprenticeships and training programs to help young people forge new careers in mining and various other vocational disciplines that support the project, including safety and human resources.

1.6 APPROACH TO MINIMISING EFFECTS AND THEIR MANAGEMENT

Whilst the benefits of the BOGP are significant and demonstrably meet the purpose of the Act (in that the project would generate significant regional and national benefits), environmental effects need to be managed appropriately.

Section 6 of this report provides an assessment of the actual and potential effects of the BOGP, which is based on the various technical assessments commissioned by MGL. As well as providing a measure of baseline biodiversity values across the Project Site, many of the technical assessments have also recommended the measures that will be implemented to avoid, remedy or mitigate potential adverse effects on the environment. These recommendations have been accepted by MGL and reflected in the suite of proposed conditions to attach to the various approvals sought, as provided in **Part D** of these application documents.

MGL’s activities will also be managed by a suite of comprehensive management plans that have been developed with appropriate input from technical experts. These management plans are provided in **Part G** of this application and listed in Table 1-1 below, with MGL seeking for all these management plans to be certified as part of the fast-track process.

Table 1-1: Bendigo-Ophir Gold Project Management Plans

Management Plans to be Approved / Certified as Part of the Fast-Track Process
Water Management Plan
Ecological Management Plan Framework
Habitat Impact Management Plan
Avifauna Management Plan
Lizard Management Plan

Management Plans to be Approved / Certified as Part of the Fast-Track Process

Terrestrial Invertebrate Management Plan

Landscape and Ecological Rehabilitation Management Plan

Ardgour Restoration Area Management Plan

Matakanui Sanctuary Management Plan

Mammalian Pest Management Plan

Biosecurity and Plant Pest Management Plan

Biodiversity Outcome Monitoring Plan

Freshwater Ecology Management and Monitoring Plan

Erosion and Sediment Control Management Plan

Engineered Landform Management Plan

Tailings Management Plan

Pond and Reservoir Management Plan

Noise and Vibration Management Plan

Access Road Construction Traffic Management Plan

Soil Management Plan

Hazardous Substances Management Plan

Archaeological and Heritage Management Plan

Air Quality Management Plan

Table 7-1 provided in Section 7.2 of this report provides a summary of the key management and monitoring measures proposed by MGL for the BOGP.



Whilst thorough assessments have been undertaken for all actual and potential environmental effects across the entirety of the project, there are several areas where MGL has applied substantial effort in the effects assessment and effects management response undertaken:

- > Potential effects on a range of terrestrial and wetland ecology values within the Project Site and wider BOGP Area (detailed in Section 6.7 of this report). The technical assessments undertaken in this field have concluded that while existing indigenous biodiversity within the landscape is generally in decline due to ongoing habitat loss and degradation, the entire Project Site and wider BOGP Area meet the relevant criteria for recognition as significant indigenous vegetation or significant habitats of indigenous fauna. While the BOGP will have a range of potential adverse effects on terrestrial and wetland ecology values, MGL is proposing substantial measures to address these ecological effects. This includes avoiding / minimising effects on the highest value habitats and species within the Project Site which has led MGL to redesign the location and extent of several mine components. MGL is also proposing extensive biodiversity offsetting and compensation across approximately 2,219 hectares of land surrounding the Project Site, including the establishment of two predator-exclusion fenced areas within Bendigo and Ardgour Stations. These offsetting and compensation activities will be protected in perpetuity by covenants.

The technical assessments have concluded that the proposed measures are expected to result in demonstrable benefits to indigenous terrestrial and wetland biodiversity values that outweigh impacts within 35 years of the granting of approvals for the majority of biodiversity values. This includes positive outcomes for species targeted for reinstatement that are classified as rare, under-represented or locally extinct, including various plants and Threatened or At-Risk lizards. In comparison, the indigenous biodiversity within the Project Site and wider BOGP Area is generally in decline due to ongoing habitat loss and degradation, and without the interventions proposed as part of this application, most native species will continue to decline.

However, despite extensive efforts, until the outcomes of the Applied Research Plan (see below) are known, residual effects on cushionfield¹⁰ habitat and two associated species cannot be demonstrably offset or compensated for and remain. The CIT Open Pit contains particularly high densities of this vegetation (including the *Ceratocephala pungens* and *Myosotis brevis* which are classified as Nationally Critical and Nationally Vulnerable, respectively). MGL has therefore committed to only mining the majority of

¹⁰ Cushionfields are a high-value subset of herbfields which have or support high regional and / or national ecological values and often contain the presence of indigenous spring annual herbs.

the CIT Open Pit if sufficient extent of cushionfield vegetation is discovered in the wider Dunstan Ecological District such that either net gain outcomes can be demonstrably achieved elsewhere and/or the population of the two spring annuals within the CIT Open Pit footprint is equal to or less than 1% of the known population of these spring annuals plants in the wider Dunstan Ecological District. This approach is informed by the Applied Research Plan for Conservation Management, Rehabilitation and Expansion of Cushionfield or Cushionfields (“Cushionfield **ARP**”). Under the ARP, only 2.7 hectares at the southern end of CIT will be mined following the 2026 spring herb survey, providing opportunity to trial propagation of the target species.

- > MGL is also proposing to establish the BOGP Biodiversity and Heritage Enhancement Fund which will provide annual funding of \$500,000 + GST for every year in which gold is produced up to a maximum of 10 years to the Alexandra Office of the Department of Conservation. The purpose of the annual payment is to enable the Department of Conservation to support the protection and enhancement of cushionfield habitat (or other threatened or at-risk species or ecosystems) outside of the BOGP Consent Area within the Dunstan Ecological District and to enhance heritage values outside of the BOGP Consent Area within Central Otago. Refer to Section 3.23 for further details.
- > Potential landscape and visual effects on the Dunstan Mountains, which are identified as an Outstanding Natural Landscape (“**ONL**”) in the Central Otago District Plan (“**District Plan**”) – detailed further in Section 6.9 of this report. The technical assessments undertaken in this field have concluded that while the proposed mining activities will inevitably result in some significant landscape effects during operations, the various mine components have been carefully sited to reduce broader scale visual effects, landscape character effects and effects on the values that make up the Dunstan Mountains ONL. In addition, following the 568 hectares of mining activities the effects on the ONL will be appropriately managed through detailed measures to facilitate a rehabilitated mined landscape within the roughly 83,000 hectares of the Dunstan Mountains ONL.
- > Potential effects on aquatic ecological values through the unavoidable reclamation of sections of Shepherds and Rise and Shine Creeks within the Project Site (detailed further in Section 6.8 of this report). The technical assessments conclude that these effects will be remediated through the establishment of rehabilitated stream diversions, and with additional compensation in the form of willow management activities within the downstream Bendigo and Clearwater Creeks, there will be no net loss and enhanced benefit for aquatic ecological values.
- > Potential effects on the water quality of downstream environments from the mobilisation of potential constituents of concern (“**PCOC**”) such as arsenic, sulfate,



and trace metals (detailed further in Section 6.6 of this report). Extensive technical assessments have been undertaken which conclude that the proposed engineering controls and design of ELFs are of international standard, such that oxygen ingress into the landform will be prevented thereby minimising the risk of oxidation of sulphide minerals, and ingress of water into the landform will be minimised thereby reducing the risk of mobilisation of stored oxidation products. With the proposed management, the potential effects will be limited to slight elevations in PCOC during mining operations which will be managed through adaptive management processes within water quality limits and increases to stream base flow at closure. Potential betterment is also expected as a result of improvement of historic mining water quality through management/treatment.

MGL is pleased to present and seek approval for the development of the BOGP which is firmly aligned with New Zealand's development goals, and which appropriately addresses the unavoidable adverse effects of mining and related activities such that residual effects are minimised, and the substantial proposed effects management measures will provide a range of positive benefits to the environment.

1.7 APPROACH TO ENGAGEMENT WITH MANA WHENUA, COMMUNITY, STAKEHOLDERS AND INTERESTED PARTIES

MGL considers that building trust through the sharing of information and perspectives is critical to good decision-making around project development. Accordingly, MGL has adopted and promoted an active and open stakeholder engagement approach with mana whenua, relevant local and central government agencies, landowners, interest groups and the local community. In doing this, MGL has met and exceeded all consultation requirements set out in Section 11 of the Act.

In addition to the above, Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga (collectively referred to as Kā Rūnaka) prepared a Cultural Values Statement (“**CVS**”) in 2018 which has informed the development of the BOGP. Following this, MGL has continued to consult with Kā Rūnaka through continued development of the project and has offered support and resourcing to Kā Rūnaka to enable them to prepare a Cultural Impact Assessment (“**CIA**”) for the BOGP. The CIA and ongoing engagement and consultation undertaken by MGL has assisted in ensuring that Kā Rūnaka cultural values and interests, and the potential impacts of the BOGP on these values and interests, are appropriately and transparently accounted for in the project design.

Section 5 of this report provides an overview of the consultation that MGL has undertaken on the BOGP. MGL has prepared the ‘Bendigo-Ophir Gold Project Pre-Application Engagement Report’ (“**Consultation Report**”) which is included in **Part F** of these application



documents. It summarises all consultation that has been undertaken in relation to the project up until the lodgement of this substantive application. It also summarises the resulting steps and actions that have been made by MGL to address any feedback and concerns of the administering agencies, key stakeholders and the community, and appropriately account for iwi cultural values and interests.

1.8 APPLICATION STRUCTURE

This application has been prepared to describe the activities proposed, to provide an assessment of the environmental effects associated with the BOGP, and to set out other relevant information as required under Section 43 of the Act.

The application comprises ten parts:

- Part A** This substantive application document, which is structured as follows:
- > **Section 1:** This introduction, which summarises the project, the applicant, how the application aligns with the purpose of the Act, other relevant background information, and sets out the structure of this document;
 - > **Section 2:** Provides a description of the environmental setting of the project;
 - > **Section 3:** Describes the proposed BOGP activities;
 - > **Section 4:** Identifies the various approvals required under the regulatory statutes covered by the Act;
 - > **Section 5:** Describes the consultation undertaken by MGL and the outcomes of that consultation;
 - > **Section 6:** Provides an assessment of effects on the environment associated with the proposed BOGP activities;
 - > **Section 7:** Sets out the measures that MGL proposes to take to manage and monitor the environmental effects of the project;
 - > **Section 8:** Demonstrates how the BOGP aligns with the relevant information requirements set out in the Act, and provides an analysis of the proposed activities in relation to the relevant statutory provisions including relevant policy and planning documents; and
 - > **Section 9:** Sets out the key conclusions of this substantive application.



Part B	Contains 44 reports prepared by technical specialists in relation to a wide range of aspects of the BOGP and its environmental effects (some of those reports contain a large number of appendices which include substantial reports in their own right).
Part C	Is a graphic supplement of project maps showing key project components and the spatial extent of the approvals sought.
Part D	Contains the conditions MGL proffers for inclusion on each of the various BOGP approvals being sought.
Part E	Contains copies of existing approvals and authorisations associated with the BOGP, including copies of MEP60311 and the Bendigo Conservation Covenant.
Part F	Contains a report on the consultation and engagement undertaken by MGL in respect of the BOGP, and copies of affected party acknowledgements / any other landowner approvals.
Part G	Contains 23 management plans which set out measures necessary to assist with managing the environmental effects of the BOGP and for which MGL is seeking certification as part of the decision documents to be prepared under Section 87 of the Act. Further management plans are proposed within the proffered conditions (Part D) which will require certification at a later stage.
Part H	Contains a list of the rules which are triggered under the relevant RMA planning documents and the full list of objectives and policies from the relevant statutory planning documents that are considered relevant to the assessment of the BOGP.
Part I	Contains details of the land ownership of the Project Site, and adjoining properties, and all relevant Records of Title for the Project Site and adjoining properties.
Part J	Contains the relevant documents associated with the early works application, including the Assessment of Environmental Effects and supporting technical assessments.

The various technical reports included in **Part B** of these application documents are listed in Table 1-2 below.

There are several types of technical reports that are provided as part of these application documents. These include:

- > Baseline reports which set out the existing values for a particular discipline (e.g. wetlands, avifauna etc);
- > Environmental effects assessment reports which consider the effects of the proposed BOGP on the environment and recommend measures to appropriately manage any adverse effects; and
- > Technical / factual design reports which have informed the design of the BOGP. These reports have all been included for completeness and are referenced throughout this report as necessary.



Table 1-2: Reports Prepared by Technical Specialists for the Bendigo-Ophir Gold Project

Report #	Author	Topic	Title	Reference within Report
B.01	Benje Patterson – People and Places	Economics	Economic Impacts of the Bendigo-Ophir Gold Project	Benje Patterson (2025)
B.02	Kōmanawa Solutions Limited	Hydrogeology	Bendigo Groundwater Bore Take Effects Assessment	Kōmanawa (2025a)
B.03	Kōmanawa Solutions Limited	Hydrogeology	Groundwater Existing Environment and Effects Assessment	Kōmanawa (2025b)
B.04	Kōmanawa Solutions Limited	Hydrology	Surface Water and Catchment Existing Environment and Effects Assessment	Kōmanawa (2025c)
B.05	Kōmanawa Solutions Limited	Hydrogeology	Groundwater Modelling Analysis for Mining Bendigo Ophir Gold Deposit	Kōmanawa (2025d)
B.06	Mine Waste Management Limited	Geochemistry	Mine Impacted Water Overview Report	MWM (2025)
B.07	Greg Ryder Consulting	Ecotoxicology	Recommended Water Quality Compliance Limits for the Bendigo-Ophir Gold Project	Ryder (2025)
B.08	Alliance Ecology Consulting	Terrestrial Ecology	Assessment of Ecological Effects	Alliance (2025)
B.09	Habitat NZ	Terrestrial Ecology	Mammalian Pest Survey	Habitat NZ (2025a)
B.10	Habitat NZ	Terrestrial Ecology	Native Bat Survey	Habitat NZ (2025b)
B.11	Habitat NZ	Terrestrial Ecology	Terrestrial Invertebrate Survey	Habitat NZ (2025c)



Report #	Author	Topic	Title	Reference within Report
B.12	RMA Ecology	Terrestrial Ecology	Wetland Values Assessment	RMA Ecology (2025a)
B.13	RMA Ecology	Terrestrial Ecology	Vegetation Values Assessment	RMA Ecology (2025b)
B.14	RMA Ecology	Terrestrial Ecology	Avifauna Values Assessment	RMA Ecology (2025c)
B.15	RMA Ecology	Terrestrial Ecology	Lizard Values Assessment	RMA Ecology (2025d)
B.16	Manaaki Whenua - Landcare Research	Rehabilitation & Closure	Applied Research Plan for Conservation Management, Rehabilitation and Expansion of Cushionfield	Landcare (2025)
B.17	Water Ways Consulting	Aquatic Ecology	Assessment of Effects on Aquatic Habitat	Waterways (2025)
B.18	Boffa Miskell	Aquatic Ecology	Assessment of Freshwater Ecological Effects	Boffa Miskell (2025a)
B.19	Boffa Miskell	Landscape, Natural Character and Visual Effects	Landscape, Natural Character and Visual Effects Assessment	Boffa Miskell (2025)
B.20	Engineering Geology Limited	Geotechnical	Site-Specific Seismic Hazard Study Report	EGL (2025a)
B.21	Engineering Geology Limited	Geotechnical	Shepherds Tailings Storage Facility Technical Report	EGL (2025b)
B.22	Engineering Geology Limited	Geotechnical	Site Geotechnical Factual Report	EGL (2025c)
B.23	Engineering Geology Limited	Geotechnical	Shepherds Silt Pond Technical Report	EGL (2025d)



Report #	Author	Topic	Title	Reference within Report
B.24	Engineering Geology Limited	Geotechnical	Rise and Shine Pit – Creek Diversion Technical Report	EGL (2025e)
B.25	Engineering Geology Limited	Geotechnical	Process Plant and Infrastructure Report Geotechnical Report	EGL (2025f)
B.26	Engineering Geology Limited	Geotechnical	Erosion and Sediment Control Report	EGL (2025g)
B.27	Engineering Geology Limited	Geotechnical	Shepherds, Western and Srex Engineered Landforms and Come In Time Pit Backfill Technical Report	EGL (2025h)
B.28	Peter O'Bryan & Associates	Geotechnical	Geotechnical Assessment - Open Pit and Underground Mining - Rise and Shine Deposit	POB (2025)
B.29	Marshall Day Acoustics	Noise & Vibration	Assessment of Noise and Vibration Effects	Marshall Day (2025)
B.30	Stantec	Transportation	Integrated Transport Assessment	Stantec (2025)
B.31	Cosgroves Limited	Lighting	Exterior Lighting Report	Cosgroves (2025)
B.32	Geocontam Risk Management	Ground Contamination	Preliminary Site Investigation	GRM (2025)
B.33	Pattle Delamore Partners	Air Quality	Assessment of Environmental Effects from the Discharge of Contaminants into Air	PDP (2025)
B.34	New Zealand Heritage Properties Limited	Archaeology & Heritage	Heritage Assessment	NZHP (2025a)



Report #	Author	Topic	Title	Reference within Report
B.35	New Zealand Heritage Properties Limited	Archaeology & Heritage	Magazine and Emulsion Tank Memorandum	NZHP (2025b)
B.36	New Zealand Heritage Properties Limited	Archaeology & Heritage	Construction Camp Heritage Assessment	NZHP (2025c)
B.37	New Zealand Heritage Properties Limited	Archaeology & Heritage	Ardgour Rise Realignment Memorandum	NZHP (2025d)
B.38	New Zealand Heritage Properties Limited	Archaeology & Heritage	Come in Time Track Memorandum	NZHP (2025e)
B.39	Rob Greenaway & Associates	Recreation	Recreation Assessment	Greenaway (2025)
B.40	Mine Closure Management	Rehabilitation & Closure	Mine Closure Plan	MCM (2025)
B.41	Process Flow	Water	BOGP Post Closure Active Water Treatment Plant Order of Magnitude Study	Process Flow (2025)
B.42	Hydro Geochem Group	Water	BOGP Wetland Drawdown Assessment	HGG (2025a)
B.43	Hydro Geochem Group	Water	BOGP Flow Augmentation Strategy	HGG (2025b)
B.44	Lane Associates Limited	Bond	Bond Introduction	Lane Associates (2025)

