

BEFORE THE EXPERT PANEL

FTAA-2507-1089

**UNDER
IN THE MATTER**

Fast-track Approvals Act 2024
of the Bendigo-Ophir Gold Project

**MEMORANDUM OF COUNSEL FOR SUSTAINABLE TARRAS
CROSS-EXAMINATION – GEOTECH AND ECONOMICS**

Dated 14 June 2026

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TO THE EXPERT PANEL

In accordance with the Panel's Minute 30, Sustainable Tarras seeks leave for counsel to cross-examine:

1. The Geotech witnesses on tailings and waste rock disposal options, open pit and TSF factor of safety, induced seismicity, sufficiency of information, closure criteria, groundwater flow scenarios.
2. The economics experts on economic methodology, key assumptions including for tax and royalties, assessing market and non-market impacts including on tourism, addressing other key risks/uncertainties, conclusions regarding regional or national significance of benefits, bond and Trust arrangements.

14 June 2026

A handwritten signature in black ink, appearing to read 'Sally Gepp', is positioned above the printed name and title.

Sally Gepp KC
Counsel for Sustainable Tarras Inc