

BEFORE THE EXPERT PANEL

FTAA-2507-1089

UNDER
IN THE MATTER

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

STATEMENT OF MATT SOLE ON BEHALF OF SUSTAINABLE TARRAS

Dated 7 September 2026

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TO THE EXPERT PANEL

1. My name is Matt Sole. I provided a statement on behalf of Sustainable Tarras Inc in relation to heritage as relevant to Matakanaui Gold Limited's (MGL) application in March 2026. My qualifications and experience were set out in that statement.
2. The purpose of this statement is to respond to MGL's new information in response to RFI 11.

Question 10

10. On the basis of the evidence of:

- a. Dr Tocker that long term survival rates of relocated lizards are likely to be very low (the expectation of low or no survival was supported by the Applicant's ecologists);*
- b. No reliable means by which survival can be measured;*
- c. Expected salvage costs in the vicinity of "tens of millions of dollars" for the relocation of the 102,000 lizards;*
- d. General expert agreement that the area and habitat types of the currently proposed enclosures are not sufficient to address the effects on lizards (paragraphs 130 of the JWS on lizards and 79 of the JWS on effects management);*
- e. The existence of peer reviewed research verifying that lizard populations can double in pest-free environments;*

please advise what consideration has been given to other alternative approaches? For example, substantially larger pest exclusion fenced areas and/or alternative locations than currently proposed.

MGL's response

3. MGL's response states that "MGL proposes a refined package of measures." This includes "Replacement of the proposed Ardour sanctuary with the larger Battery Hill sanctuary." It is stated that "the proposed Bendigo and Battery Hill sanctuaries will be subject to ongoing predator exclusion, habitat restoration, habitat enhancement, monitoring and adaptive management." Activities are stated to include "deployment of salvaged habitat materials, construction of refugia, weed management, restoration planting and other measures intended to improve habitat quality and carrying capacity."

My response

4. There appears to be to be no archaeological survey or heritage impact assessment in relation to the new Battery Hill sanctuary proposal. There are also no conditions proposed in relation to this new proposal's heritage impacts.
5. As result of the Heritage expert evidence and conferencing Battery Hill is now a significant landmark acknowledging the nationally rare archaeological site sequence, featuring six hard rock mining stamper batteries with aligned mining operations within a 2 km radius of Battery Hill. This is significantly more than the Bendigo Logantown and Welshtown mining area.

6. It has not been extensively surveyed as it was until recently considered outside of the mining effects footprint (as stated by NZHP). It features a locally significant early survey cairn and survey relevance and reference to early pastoral run plans, early transport and settlement plans and aligned mining plans and permits.
7. During my field survey work within the proposed Battery Hill sanctuary area I have observed evidence of pre-1900 pack and wagon tracks, two water races (one of which supplied the early Kohinoor alluvial workings now dissected by the Bendigo Sanctuary proposal), a dam and hut and camp site ruins and alluvial mine working evidence along the Rise and Shine creek and off the lower Battery Hill faces.
8. The Battery Hill Sanctuary is part of the DOC conservation covenant for heritage landscape and biodiversity. Especially in association with heritage, it is part of section 11 & 12 with its specific heritage covenant provisions for “wander at will” access and associated preservation, management and public interpretation.
9. The predator proof fence and earthworks associated with habitat restoration and habitat enhancement should be subject to an archaeological survey assessment and archaeological authority in addition to being a relevant effect for resource consent purposes.
10. Having walked to the Battery Hill summit on several occasions I can confirm that for those seeking to view the heritage landscape, the summit provides an outstanding landscape panorama of Rise-n-Shine (with its significant heritage contribution recognised by the heritage conservation covenant provisions) and Shepherds catchment with views out to the Upper Clutha and Lindis catchments beyond. The construction of predator proof fences will introduce built structures into this heritage landscape, adding cumulatively to the combination of human impacts on the heritage experience.

Conditions

11. I have reviewed the recommended conditions from Heritage NZ Pouhere Taonga (provided without prejudice to its position that the Archaeological Authority should be declined), and the revised conditions filed by MGL together with the updated Archaeological Heritage Management Plan.
12. It is difficult for me to comment on those because of the methodological limitations of the archaeological assessment, particularly NZHP’s compartmentalisation approach discussed in my previous evidence. My concerns about this methodology were supported by all heritage experts except Dr Woods. I also have concerns with the survey robustness, and disagree with the minimalist significance assessment and the lack of meaningful place-based values attributed to sites, features and their respective grouping - ma whenua, pastoral, transport, mining technologies, early settlement.
13. I have concerns with the compartmentalised approach to archaeological authorities which minimises the cumulative impact of the mining project on Bendigo Heritage landscape and its associated destruction, modification and disturbance to the arrays of heritage complexes, sites and features, along with the commutative intrusion of industrial scale modern mining collectively on the project footprint heritage and to wider heritage landscape. One

complete archaeological authority is required in my opinion for the mine footprint, Come In Time access via Logantown, Bendigo Creek Willow works, and Bendigo & Battery Hill Sanctuaries. I also have concerns with the lack authority conditions around managing effects from long term blasting vibration and dust. In this semi-arid climate, with the prolonged and extensive heavy vehicle movements and extensive associated overburn removal and proximate blasting proposed, adjacent to significant heritage complexes, sites and features the management of effects and impacts needs more precautionary conditions.

14. I endorse Heritage NZ Pouhere Taonga recommended conditions (should consent be granted and with caveats for the above concerns over separate authorities, absence of provisions for dust and blasting effects management and lack of archaeological assessment for new proposed Battery Hill Sanctuary). However given the archaeologists' shared concerns over the robustness and adequacy of the existing archaeological surveys, provisions and mechanisms are needed for any new feature/site finds and reporting, covering their association and connectivity to related heritage complexes and heritage themes of mana whenua, transport, pastoral, goldmining, and early settlement heritage.

7 September 2026

Matt Sole