

BEFORE THE EXPERT PANEL

IN THE MATTER	of the Fast-track Approvals Act 2024 (FTAA)
AND	
IN THE MATTER	of an application for approvals under the FTAA for the Bendigo-Ophir Gold Project FTAA-2507-1089

MEMORANDUM OF COUNSEL FOR ENVIRONMENTAL DEFENCE SOCIETY INC (CROSS-EXAMINATION TOPICS FOR ECONOMICS - 17 JUNE 2026)

15 June 2026

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Introduction

1. This memorandum is filed by the Environmental Defence Society Inc. (**EDS**) in response to Minutes 30 and 33.
2. Leave is sought for focused cross-examination of economic witnesses on the following topics (subject to the caveats set out in our previous memoranda):
 - a. appropriate economic assessment framework, including non-market values;
 - b. magnitude and distribution of costs and benefits;
 - c. funding of long term mine management.
3. While these topics do not strictly align with the topics listed in the joint witnesses statement, they have been identified in anticipation of key topics to be addressed in the context of the hearing format being adopted by the Panel.

Dated this 15 June 2026

Rob Enright/ Jen Vella

Counsel for EDS