

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 - PLANNING**

17 June 2026

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Introduction

1. This memorandum is filed by the Environmental Defence Society Inc (**EDS**).
2. Leave is sought to cross-examine relevant experts (particularly Applicant experts) in response of the Planning concurrent hearing scheduled for 18 June, primarily on the following topics:

Consideration of Alternatives

Assessment against the relevant planning framework/instruments

Long-term management post mine closure

S107 RMA

Adequacy of information

Material matters arising from answers given by experts

Dated this 17 June 2026

Rob Enright / Jen Vella
Counsel for EDS