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## **BENDIGO-OPHIR GOLD PROJECT SUBMISSION IN OPPOSITION**

**To:** Bendigo-Ophir Gold Project Panel  
**From:** The Canyon Vineyard Ltd  
Hayden Johnston (Owner/Director)

**Postal Address:** [REDACTED]

**Email Address (correspondence and draft conditions):** [REDACTED]

**Date:** 10 April 2026

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### **1. Introduction and Standing**

1.1 This submission is made by Hayden Johnston. I am the owner and operator of The Canyon Vineyard Ltd. The company operates under Tarras Wines Ltd and trades as Tarras Vineyards, Kuru Kuru Wines and The Canyon at Tarras Vineyards.

The business encompasses:

**Wine Production and Sales:** Operating as a certified BioGro Organic vineyard I planted in 2002 at Bendigo, producing high-value Pinot Noir for the global fine wine market.

**Events at The Canyon:** We have a perpetual, hard fought for, Resource Consent to host an unrestricted number of weddings and corporate events located just 5km from the mine site. The outstanding landscape and breathtaking views are the USP for the venue.

**Wine Tourism:** We are now a key fixture in the Central Otago tourism circuit, contributing to the region's "clean, green" brand with regular VIP wine tours from Queenstown's luxury accommodation providers.

**Accommodation Investment:** We are in the process of incorporating on-site accommodation to support the events at The Canyon where business conference



and wedding parties can book mini-lodge style accommodation on site utilising the existing dining facilities and resource consent.

1.2 I hold a Bachelor of Commerce (BCom) and a Diploma for Graduates (DipGrad) from the University of Otago. I have been a Chartered Accountant and originally trained and qualified with Price Waterhouse before working in London for multinational corporations.

1.3 As a Māori business owner (Waihōpai Rūnaka and Te Rūnaka o Awarua), I view land use through the lens of *kaitiakitanga*. I am a founding member of the Tuku Māori Winemakers Collective.

## **2. Investment Context and Amenity Value**

2.1 When I purchased this land from John Perriam in 2002, a primary driver of the investment was the value to me of the stunning surrounding natural landscape. My decision was based on the understanding that this amenity value was protected by a robust framework of designations, including the surrounding land protected by the Department of Conservation (DOC), the designation of the area as an Outstanding Natural Landscape (ONL), and various conservation and historic covenants.

2.2 A significant part of this value is my personal and recreational connection to the Bendigo Historic Reserve. I regularly walk and mountain bike over the Kanuka and Aurora Creek trails. The presence of a large-scale industrial mine would fundamentally destroy the tranquility and natural character of these trails, which represent a core component of the "sense of place" that defines Bendigo. The BOGP represents a total departure from these protections and the environmental expectations upon which my life and business in this region are founded.

## **3. Economic Incompatibility and Expert Evidence**

3.1 The fundamental incompatibility of my business with the BOGP is supported by the expert evidence of Professor James Higham (see his statement attached). Professor Higham's expertise reinforces the view that the "clean, green" brand equity of Central Otago cannot survive the introduction of a large-scale open-pit mining.

## **4. Erosion of the "Bendigo" Name: Perceived and Real Risk to Trade and Tourism Reputation**



4.1 The name Bendigo is currently synonymous with prestigious fine wine and export-grade merino wool. This identity allows us to compete with other fine wine regions like Burgundy and Oregon.

4.2 There is both a perceived and real risk in allowing the BOGP to proceed. Once the Bendigo name is associated with modern heavy industrial gold mining, our "Unique Selling Point" of purity and landscape-driven prestige is liquidated.

4.3 We have seen this brand liquidation in Macraes, Tiwai Point, and Marsden Point. Once a region's identity shifts to heavy industry, the brand equity built over decades is lost.

4.4 Possible NZ-EU FTA Breach: As an exporter to Europe, I highlight the Environment and Sustainable Development chapters of the NZ-EU FTA. Granting consent to an open-pit mine in a protected landscape risks violating "non-regression" principles, damaging "Brand NZ" and inviting trade friction with European partners.

4.5 Please reject the logic used in the Waihi North decision, where environmental degradation was "offset" by economic gain. An ONL cannot be balanced out by financial contributions; once industrialised, the landscape's unique heritage is permanently lost.

## **5. Investment Risk and Capital Flight**

5.1 The uncertainty created by the BOGP has already stalled my planned \$10M+ accommodation expansion. Capital follows stability; the industrialization of Bendigo will lead to capital flight from the tourism and hospitality sectors.

## **6. Applicant Risk and Compliance History**

6.1 The fact the applicant is essentially a start-up, with no record of operating a similar project, adds to the risk and uncertainty to my adjacent business. Even today, the company has just a handful of employees such that it is not in a position to mine without first recruiting the majority of the required work force outlined in their application.

6.2 We can examine their compliance record on the exploration work they have conducted at Bendigo over recent years as a predictor of future behaviour and intent. It is concerning that even with access to the necessary legal and planning experts and the funding required to engage them that applicant chose to operate outside of the Resource Management Act by not obtaining the necessary consents and radio licences for their premises on Bendigo Loop Road and with the recent construction of a radio tower on the top of Battery Hill.



## **7. Relief and Mitigation: Recognition of Vested Legal Rights and Documented Loss**

7.1 If the Panel sees fit to approve the application, for my business, this decision is an unmitigable impairment of my commercial assets. Environmental mitigation proposed by the applicant cannot resolve the fundamental conflict between a heavy industrial mine and a luxury destination that relies on the impressions from the natural landscape.

7.2 Documented Financial Loss: In 2024, my business suffered a direct \$800,000 loss of investment when a contract was cancelled by an investor specifically citing the incompatibility of the proposed gold mine. That investment was to be targeted at the beginning of on-site accommodation to compliment the venue bookings.

7.3 Recognition of Perpetual Resource Consent (RC 190110): Any relief should recognize the value of the Perpetual Resource Consent held by my business. This was "hard-fought" at the Environment Court to secure the right to operate a function venue, restaurant, wine tasting facility, and helicopter landing site in perpetuity. It provides the building blocks for future expansion and success of all 4

7.4 Business Infancy: The venue was in its infancy when the BOGP threat emerged. RC190110 was issued in late 2019, shortly before the global pandemic. Current and historical revenues do not reflect the true enterprise value.

7.5 Guaranteed Buyout Provision: Meaningful relief must include a guaranteed buyout calculated on the fair market value of the business in the total absence of the gold mine. The valuation must account for:

- The \$800,000 plus GST in lost capital already incurred.
- The value of the Perpetual Resource Consent (RC 190110).
- Recognition of the likely value the planned growth will bring to the business after the planned 30-unit accommodation expansion and with a growth pathway unimpaired by mining.
- The loss of amenity and recreational value (including the use of the Bendigo Historic Reserve) that informed the original investment.

## **8.0 Conclusion:**

The proposed mine is incompatible with my business. I request that the Panel recognizes these fundamental cultural, economic, and operational risks and declines the application.

Ngā mihi,  
Hayden Johnston  
Owner, The Canyon Vineyard Ltd

10 April 2026

Dear Fast-Track Panel,

**Letter in support of Tarras Vineyards & The Canyon Vineyard Ltd**

1. My name is Professor James Higham. I am writing this letter in support of Tarras Vineyards and The Canyon Vineyard Ltd.
2. I have written an expert report about Santana's Bendigo-Ophir Fast-Track application which was shared with the Panel yesterday, as part of the bundle of reports submitted to the Panel by Sustainable Tarras Inc. The report is named: "Sustainable Tarras 5 James Higham - Tourism. PDF". This letter is informed by the evidence presented in my expert report.
3. I am familiar with Tarras Vineyards and the Canyon, and have read draft comments from owner Hayden Johnston relating to four businesses; wine production and sales, Events at the Canyon, wine tourism and accommodation.
4. In my professional opinion, these businesses will suffer irreparable and ultimately terminal damage if this fast-track mine application is approved by the Panel.
  - a. These are the closest tourism, hospitality and events businesses to the proposed mine site, and one of the closest vineyards to Santana's proposed operation.
  - b. The tourism/hospitality experiences that people seek from a venue such as this include uninterrupted scenic views, a sense of remoteness and tranquility, natural beauty and a "100% pure" experience in all respects. This is the case whether guests are visiting for a few hours (for an important function such as a wedding or other celebration) or planning to stay for a night or more. These qualities of experience are incompatible with industrial scale mining.
  - c. Brand image and sales are closely integrated with visitor experiences. Visitor perceptions of the natural landscape elements of grape growing and human elements of wine making and wine production are critical to the visitor experience.
  - d. To have an industrial scale open-pit mine operation very close by, with all the associated impacts and traffic, is wholly inconsistent with all aspects of the wine experience, and wider visitor experiences of Central Otago landscapes.
  - e. The clean, green and '100% Pure' brand equity of a region like Central Otago is fundamentally inconsistent with, would be compromised by, and might not survive co-existence with a large-scale, industrial open-pit mine.
  - f. An organic, world-class producer of Pinot Noir would be unable to maintain its brand image with an open-pit mine operation nearby.

- g. Co-existence with an open-pit mine would reduce customer demand and compromise the viability of all four businesses outlined above.
  - h. The opportunity costs arising from the current application include jeopardizing multi-generational, high-value viticulture businesses and industries that are critical to the success of the local as well as the wider regional and national tourism economies.
  - i. The opportunity costs and environmental risks arising from this finite, short-term extractive project will remain in perpetuity. This point is, in my view, one of the most clear-cut and compelling arguments against this fast track application.
5. For these reasons, I fully support the concerns raised by Mr Johnston in his comments to the Panel.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'James Higham', written over a horizontal line that extends to the right.

**James Higham**  
Distinguished Professor  
Department of Tourism and Marketing  
Griffith University  
N72 0.12, South Brisbane (Nathan) Campus  
**Email:** [REDACTED]

# LUWIS ETHAPANE

5 loop Rd, Kawarau Falls, Queenstown 9300 | [REDACTED] | [info@latitude45.co.nz](mailto:info@latitude45.co.nz)



## **Submission in Opposition to the Proposed Bendigo Ophir Gold Mine**

To Whom It May Concern,

My name is Luwis Ethapane, owner of Latitude 45, a luxury wine tour and regional sightseeing company based in Queenstown. We specialise in hosting high-net-worth guests from around the world, delivering premium, curated experiences across Queenstown and the greater Central Otago region.

Our business works closely with regional tourism bodies, including Destination Queenstown and Central Otago Tourism, and we are proud to represent the region at the highest level. We also work in partnership with many of the leading luxury hotel brands in Queenstown, delivering bespoke experiences for their guests. A significant portion of our experiences approximately 80% are built in close collaboration with boutique vineyards and producers, with a strong focus on storytelling, landscape, and the unique identity of Central Otago wines.

Bendigo is a cornerstone of what we offer. It is one of the most visually striking and culturally rich subregions in Central Otago, where we deliver exclusive, high-end wine experiences in collaboration with vineyard owners and winemakers such as Tarras Vineyard, Folding Hill, Mondillo Wines Peregrine & Gibbston Valley Vineyard. These experiences are not only about wine but about connection to place highlighting the region's natural beauty, its rugged landscapes, and its deep-rooted history, including historic gold mining areas such as Welsh Town and surrounding sites.

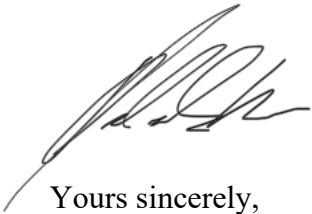
Our guests travel from across the globe specifically to experience this authenticity, untouched landscapes, world-class vineyards, and the stories that define Central Otago. Bendigo and its surrounding areas have, in recent years, gained significant international recognition for their wines, particularly Pinot Noir, placing the region firmly on the global stage.

We are therefore strongly opposed to the proposed Bendigo Ophir gold mine. The introduction of a large-scale mining operation into this environment would fundamentally alter the landscape, negatively impacting the visual integrity, environmental quality, and overall perception of the region. For the high-end international market we serve, the appeal of Central Otago lies in its pristine, unspoiled nature and its reputation as a premium wine destination.

The development of the Bendigo Ophir gold mine risks undermining years of investment, effort, and global exposure by the wine industry, tourism operators, and regional stakeholders. It would compromise the very qualities that attract discerning travellers to the region and could have long-term consequences for both tourism and the wine sector.

Latitude 45 stands firmly in opposition to this proposal. We believe the long-term value of preserving Bendigo's landscape, heritage, and reputation as a world-class wine destination far outweighs the short-term gains of mining development.

Thank you for the opportunity to provide this submission.



Yours sincerely,  
Luwis Ethapane  
Owner  
Latitude 45 Luxury Tours Limited



75 Beach St  
St Claire  
Dunedin

7 April 2026

Fast-Track Consenting Team  
Environmental Protections Authority  
P O Box 63 002  
Wellington

To the Members of the Expert Consenting Panel

**SUBMISSION IN SUPPORT OF TARRAS VINEYARDS' OPPOSITION TO THE SANTANA MINERALS  
BENDIGO-OPHIR GOLD PROJECT**

We write in support of Tarras Vineyards and other local land-based, tourism and export businesses opposing the proposed Santana Minerals Bendigo–Ophir gold mine near Tarras.

Central Otago's economy is built on landscape integrity, water quality, and reputation. Viticulture, tourism, horticulture and farming are not incidental activities in this region; they are long-established, intergenerational industries that depend on the very values this proposal would place at risk. The proposed mine represents a scale and intensity of industrial activity fundamentally incompatible with those values.

The project involves multiple large open-cast pits, extensive processing infrastructure and a substantial tailings storage facility in a highly visible and outstanding Central Otago landscape. Once altered, this landscape cannot be restored to its current state. For businesses such as Tarras Vineyards, whose products and visitor experience are intrinsically linked to place, the visual and environmental impacts are not abstract concerns—they directly threaten brand value, market confidence and long-term viability.

Of particular concern is the management of tailings and cyanide-based processing in proximity to the Mata-Au / Clutha River catchment. While modern mining controls are claimed by the proponent, the consequences of failure—however unlikely—would be borne locally and permanently. The risk profile is asymmetric: short-to-medium-term gains accrue to the proponent, while long-term environmental, reputational and economic costs would remain with the region.

The proposal also risks undermining existing sustainable economies. Central Otago's wine, tourism and food producers compete in premium global markets where environmental stewardship and provenance are critical. Association with a large-scale open-cast mine, tailings facilities and heavy industrial activity risks eroding the clean-green reputation upon which these industries depend.

We are further concerned by the project's progression through the Fast-track Approvals process. Given the scale, complexity and irreversible nature of the proposal, a process perceived as limiting public scrutiny and participation is inappropriate. Community opposition, including that led by Sustainable Tarras, reflects genuine and well-founded concern, not ideological resistance to development.

While economic benefits and employment opportunities are cited by the proponent, these must be weighed against the opportunity cost of displacing or degrading industries that already deliver

enduring employment, export revenue and regional resilience. Mining is finite; Central Otago's landscapes and reputation are not renewable.

In addition to the concerns set out above, we consider the following matters to be significant and, collectively, to weigh strongly against granting consent:

#### **Cultural landscape and Te Tiriti considerations**

- Insufficient recognition and protection of wāhi tapu and wider cultural landscapes, including the risk of disturbing kōiwi (human remains) and other taonga through excavation, earthworks, and increased access.
- Insufficient assurance that meaningful engagement and consent processes with mana whenua and affected Māori stakeholders have been undertaken to the standard expected under Te Tiriti o Waitangi principles and good-faith partnership.

#### **Environmental and biosecurity risks**

- Heightened biosecurity and ecological risks from increased vehicle movements, vegetation clearance, and habitat fragmentation, undermining restoration efforts, and the resilience of native species.

#### **Economic, cumulative effects, and long-term liability**

- Inadequate assessment of cumulative effects (existing land uses, tourism pressures, climate stressors) and the precedent this project would set for further industrialisation of Central Otago.
- Unacceptable long-term liability and uncertainty around closure, rehabilitation, and post-closure monitoring, including who bears the cost if the operator's financial assurances prove inadequate.
- Misalignment with the region's strategic direction and brand as a premium food-and-fibre and wine-producing landscape; even perceived contamination risk can harm market confidence, certifications, and investment.
- Disproportionate impacts on Māori enterprise and local whānau livelihoods where benefits are short-term and externalised, while risks (water quality, dust, noise, landscape change) are long-lasting and borne locally.
- Misalignment with the region's strategic direction and brand as a premium food-and-fibre and wine-producing landscape; even perceived contamination risk can harm market confidence, certifications, and investment.
- Disproportionate impacts on Māori enterprise and local whānau livelihoods where benefits are short-term and externalised, while risks (water quality, dust, noise, landscape change) are long-lasting and borne locally.

For these reasons, we oppose the Santana Minerals Bendigo–Ophir gold project and support Tarras Vineyards and the Tarras community in seeking to protect the environmental, cultural and economic foundations of Central Otago. We respectfully request that the Panel recognise these fundamental incompatibilities and decline the application, affirming that kaitiakitanga, Māori values, and the long-term aspirations of the Central Otago community must take precedence over short-term extraction.

Nāku noa, nā





**To: The Fast-Track Expert Consenting Panel**

***Regarding: Submission in Opposition to the Santana Minerals Bendigo-Ophir Gold Project***

Tuesday, 7 April 2026

To the Members of the Expert Consenting Panel,

I am writing to you as the Owner of Check In Ltd, a tourism operator based in Queenstown. This letter is written to formally register my strong opposition to the Bendigo-Ophir Gold Project and to formally support the submission made by The Canyon Vineyard Limited, trading as Tarras Vineyards and Kuru Kuru Wines.

The Central Otago brand is built on a foundation of "Pure New Zealand" aesthetics: pristine landscapes, premium viticulture, and world-class outdoor recreation. The proposed gold mine is fundamentally incompatible with the existing economic pillars of tourism and high-value exports that sustain our region.

Beyond economic concerns, I wish to highlight several critical points of incompatibility and environmental risk:

**1. Violation of Cultural and Spiritual Values**

The scale of this project is fundamentally incompatible with the Māori value of *tiaki* (guardianship and protection). Our role as stewards of this land is to ensure its health for future generations. A project of this magnitude does not protect the land; rather, it represents a failure to uphold our collective responsibility to the environment.

**2. Permanent Defacement and Ecological Loss**

The proposed open pits and tailings infrastructure will permanently deface the land, leaving scars that no amount of remediation can truly heal. Furthermore, the development threatens to displace and destroy the habitats of our native lizards, many of which are unique to this dryland ecosystem and are already under significant pressure.

**3. Irreversible Risk to Waterways**

The proximity of the proposed processing facilities and tailings dams to the Clutha River watershed presents an unacceptable risk. The potential for permanent and irreversible pollution of our waterways through chemical leaching or accidental discharge is a threat that our region's tourism, agriculture, and local communities simply cannot afford to take.

**4. Conflict with Export and Organic Branding**

Our region's export success relies on an unblemished environmental reputation. Like the organic practices maintained by Tarras Vineyards, many local businesses have spent decades achieving rigorous certifications. The risks associated with industrial dust and water contamination pose a direct threat to the "Clean and Green" status required to maintain our premium position in international markets.



**5. Erosion of the Visitor Experience**

Tourism in Central Otago is a "landscape-led" economy. The industrialization of this area—marked by rock blasting, 24/7 light pollution, and heavy machinery—will transform a tranquil destination into a heavy industrial zone. This shift will inevitably lead to a decline in visitor satisfaction and a loss in long-term tourism revenue.

I urge the Panel to consider the "opportunity cost" of this project. The short-term extraction of gold should not come at the expense of the permanent, sustainable export and tourism industries that define Central Otago, nor should it override our duty to protect the land and water.

We stand with The Canyon Vineyard Limited and other local stakeholders in requesting that the Panel recognizes these fundamental incompatibilities and declines the application.

Ngā manaakitanga,

A handwritten signature in black ink, appearing to read 'Karmela Rapata', is written over a large, faint pink fingerprint graphic that occupies the right side of the page.

**Karmela Rapata**  
Founder and Product Development Director

**Check In Ltd t/a Check In Queenstown**  
[Redacted]  
[Redacted]  
www.checkin.nz