

Before the Fast-track Panel

Under: The Fast-track Approvals Act 2024
In the matter of: FTAA-2507-1089 – Bendigo- Ophir Gold Project

Statement of advice Dr Justyna Giejsztowt
Principal Ecologist – Biodiversity and Modelling Specialist.
Consultant on behalf of the Department of Conservation.
9th April 2026

Introduction

1. My full name is Justyna Giejsztowt of Christchurch.

Instruction

2. I am providing expert advice on behalf of the Department of Conservation (DOC) on the Bendigo–Ophir Gold Project Fast-track application.
3. My advice specifically relates to the application for the Bendigo-Ophir Gold Project consent and may be used to inform Section 53 comments

Qualification and Experience

4. I am a Principal Ecologist – Biodiversity and Modelling Specialist at Wildland Consultants Ltd (Wildlands). I completed my PhD in Ecology and Biodiversity at the Victoria University of Wellington. I completed my BSc in Biology and Geography, with an endorsement in Environmental Science at the University of Canterbury. I have an MSc in Applied Ecology from both the University of Poitiers (France) and the University of Kiel (Germany).
5. I am an experienced terrestrial ecologist with more than 15 years' professional experience working across government, commercial and academic sectors. Prior to consultancy, I worked as a post-doctoral researcher in the field of ecology. The majority of my work focussed on ecology, as well as the development of novel modelling and statistical tools, particularly to understand ecological trends at larger spatial scales. In my role at Wildlands, I routinely provide assessments of effects management packages across a variety of developments. I have provided expert evidence relating to the assessment of effects management packages in several cases, including for a proposed coal mine at Te Kuha, a proposed gold mine at Waihi North, as well as gravel extraction at the Waimakariri River. Further, I have been actively involved in ongoing discourse within the academic literature regarding methods used to assess such packages. Recent relevant publications include:

Maseyk, F.J.F., Barea, L.P., Mealey, C., Corkery, I. and J Giejsztowt. 2025. Facilitating better ecological outcomes from high-stakes decision-making requires evaluation of biodiversity models to address risk and transparency. *New Zealand Journal of Ecology* 49 (1), 3592

Corkery, I., Barea, L.P., Giejsztowt, J., Maseyk, F.J.F., Mealey, C. 2023. Poorly designed biodiversity loss-gain models facilitate biodiversity loss in New Zealand. *New Zealand Journal of Ecology* 47 (1)
6. In this process, I have provided an assessment of the offsetting and compensation package proposed.

Code of conduct

7. Whilst it is acknowledged this is not an Environment Court Proceeding, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in the preparation of this advice. Unless I state otherwise, this advice is within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

Material Considered

8. In preparing this advice I have reviewed:
 - i. Alliance Ecology (2025). *Assessment of Ecological Effects: Terrestrial Ecology*. Prepared for Matakanui Gold Ltd. 202pp.
 - ii. Alliance Ecology (2025). *Bendigo-Ophir Mine: biodiversity offset modelling for terrestrial ecology values*. Prepared for Santana Minerals. 21pp.

I have additionally drawn on information from:

- iii. Alliance Ecology Ltd (2025). Bendigo-Ophir Gold Project Lizard Management Plan
- iv. Alliance Ecology Ltd. (2025). Bendigo-Ophir Gold Project: Avifauna Management Plan. Alliance Ecology Ltd., Auckland.
- v. Biodiversity Solutions Ltd. (2025). Ardour Restoration Area Management Plan.
- vi. Boffa Miskell, Manaaki Whenua Landcare Research and Habitat NZ Ltd (2025). Bendigo-Ophir Gold Project: Landscape and Ecological Rehabilitation Management Plan: Part A.
- vii. Habitat NZ Ltd. (2025). Bendigo-Ophir Gold Project: Landscape and Rehabilitation Management Plan: Part B (Appendices). Manaaki Whenua & Boffa Miskell., Auckland.
- viii. Habitat NZ Ltd. (2025). Bendigo-Ophir Gold Project: Terrestrial Invertebrate Management Plan. Habitat NZ Ltd., Auckland.
- ix. Habitat NZ Ltd. (2025). Bendigo-Ophir Gold Project: Matakanui Sanctuary Management Plan. Habitat NZ Ltd., Auckland.
- x. Habitat NZ Ltd. (2025). Bendigo-Ophir Gold Project: Mammalian Pest Management Plan. Habitat NZ Ltd., Auckland.
- xi. Manaaki Whenua-Landcare Research (2025). Applied Research Programme (ARP) for conservation management, rehabilitation and expansion of cushionfield herbfields.
- xii. RMA Ecology Ltd. (2025a). Bendigo-Ophir Gold Project: Vegetation Values Assessment. Report prepared for Matakanui Gold Ltd.

- xiii. RMA Ecology Ltd. (2025b). Bendigo-Ophir Gold Project: Lizard Values Assessment. Report prepared for Matakanui Gold Ltd. 76 pages.
9. I have not undertaken a site visit due to time constraints within the Fast-track process.

Scope of advice and expert opinion

10. My expert advice is provided in full within an appended report:
Wildland Consultants Ltd (2026) Santana Bendigo-Ophir Gold Mine Compensation and Offsetting Assessment. Report Number 7861. Prepared for the Department of Conservation. 24 pp.
11. My evidence addresses the following matters:
- i. Adequacy of the applicant's assessment of values, noting any values not identified.
 - ii. Adequacy of the applicant's assessment of effects, noting any effects not adequately addressed.
 - iii. Adherence to best practice guidelines. For example, adherence to the mitigation hierarchy and understanding of the principle of additionality.
 - iv. Adequacy of the applicant's proposed effects management measures.

Conclusion

12. Based on existing known values, I conclude that the currently proposed effects management package (including all actions to avoid, remedy, mitigate, offset and/or compensate) does not adequately address expected impacts to achieve No Net Loss of indigenous biodiversity. Effects management interventions are inadequate, although the degree to which the package falls short is not yet known due to substantial uncertainty. Substantial gaps exist in the current knowledge of both the biodiversity on-site and the likely outcomes of management interventions for many species, especially nationally and regionally threatened plant and invertebrate species. Knowledge gaps in this proposal are directionally biased, such that biodiversity values are likely to be underrepresented, while certainty in the outcomes of interventions is overrepresented.
13. Accordingly, I conclude that the effects management package is inadequate. Addressing the information gaps I describe in my main report would enable a more substantiated assessment of this effects management package. I consider that implementing the recommendations I provide would bring this package closer to No Net Loss, given the information currently provided by the Applicant.

Attachments

Attachment A: Wildland Consultants Ltd (2026) Santana Bendigo-Ophir Gold Mine Compensation and Offsetting Assessment.