

Before an Expert Consenting Panel

Under the

Fast-track Approvals Act 2024

And

In the Matter of

an application for approvals by
Matakanui Gold Limited to establish,
operate, rehabilitate and ultimately
close an open pit and underground
gold mining operation known as the
Bendigo-Ophir Gold Project

**Memorandum of Counsel on behalf of
Matakanui Gold Limited responding to
Request for Information #5 –
Conservation Covenant**

Dated: 5 June 2026

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MAY IT PLEASE THE EXPERT PANEL

Introduction

1. This Memorandum of Counsel is filed on behalf of Matakanui Gold Limited (**Matakanui Gold**) in response to the Expert Panel's Request for Information #5 on the Bendigo Conservation Covenant (**RFI Five**).

2. RFI Five seeks:

(a) More detailed (i.e. finer grained) legible mapping that shows on a scaled aerial plan base (at a scale where rock outcrops etc are legible) and a scaled Land Information New Zealand (**LINZ**) Topo Map base:

- (i) the Rise and Shine Creek Area of the Covenant;
- (ii) the 'umbrella' covenant area;
- (iii) the applicant's proposed covenant uplift area;
- (iv) the applicant's proposed 'disturbance' footprint; and
- (v) the applicant's proposed ecological restoration and habitat enhancement areas.

(together, **Request One**).

(b) A separate scaled version of the detailed mapping in Request One that shows:

- (i) the slope analysis for the area;
- (ii) 1 m contours;
- (iii) all watercourses;
- (iv) all vegetation features (drawing from the ecology evidence and the Application for Exchange of Property Rights (**AEPR**) where relevant);
- (v) all heritage features (drawing from the heritage evidence and Jill Hamel's work "The rich fields of Bendigo" where relevant); and
- (vi) all existing accessways including roads, tracks and unformed legal roads.

(together, **Request Two**)

Response

3. Landpro NZ has prepared a suite of maps responding to Request One and Two comprising of:
 - (a) overall aerial and topographic spatial index maps; and
 - (b) a series of maps illustrating the matters identified in Requests One and Two.
4. The aerial and topographic spatial index maps label each area with a reference number, which corresponds to the numbering used in the more detailed series maps.¹ We recommend that the Expert Panel review the Request One and Two map series together with the spatial index maps, which serves as a reference key.
5. RFI Five seeks mapping illustrating the 'umbrella' covenant area. The 'umbrella covenant' area depicted on the RFI Five maps is mapped as the areas of land that the Bendigo Conservation Covenant is registered on.
6. It is noted that the file sizes of the RFI Five response have been reduced to enable submission into the EPA portal. If it would assist the Panel, higher resolution maps can be provided by another avenue.

Dated 5 June 2026



Joshua Leckie / Charlotte Coyle / Mia Turner
Counsel for Matakanui Gold Limited

¹ The index numbering is in the top left hand corner of each detailed map series.