Fast-track

Te Kāwanatanga o Aotearoa
New Zealand Government

MINUTE 43 OF THE EXPERT PANEL
Appointment of Tax Advisor

Bendigo-Ophir Gold Project

[FTAA-2507-1089]

[31 July 2026]

[1] This Minute advises the engagement, pursuant to s67 of the FTAA, of Mr. Robin Oliver to prepare a report for the Panel.

[2] Mr. Oliver is a principal of specialist tax advisory practice, Olivershaw. He is a recognised expert in tax policy, tax economics and tax advice, a former partner of Arthur Andersen and served as Deputy Commissioner of Policy at the Inland Revenue Department for 16 years.

[3] The Panel is seeking his expert advice in respect of the differences of opinion which emerged between the economists participating in expert conferencing and the subsequent concurrent (hot tub) hearing about the security of the anticipated revenue flows to the New Zealand Government from the development, if approved. In particular, the Panel has briefed him to address any opportunities for, and the likelihood of, "taxation leakage" to other tax jurisdictions, as contended by some of the economists called for parties/invitees.

[4] Mr. Oliver's final report is anticipated at or about the date scheduled for processing recommencement (17 August 2026).

[5] The Panel notes MGL's co-operation in facilitating Mr. Oliver's appointment during the period that processing of the application is paused under s64 of the Act.

Hon Matthew Muir KC

Bendigo-Ophir Gold Project Expert Panel Chair