



Memorandum

To: Bendigo-Ophir Gold Project Expert Panel

From: Santana Minerals

Date: 14 September 2026

Re: Spring Annuals

Provision of Data

(CODC Statement of Supplementary Evidence of Michael Harding Terrestrial Ecology 20 August)

Mr Harding's evidence states that requests for access to spring annual data were declined by MGL.

Spring Annual data from the 2025 survey was requested by experts attending workshops held on 18 and 19 February 2026. MGL provided the data as excel spreadsheets to all regulator experts on 9 March following a discussion with the relevant landowners and receipt of their approval for the release of their data. One landowner withheld their permission and the data relating to that property was removed from the data set. Mr Harding confirmed receipt of the data in March 2026 (see Figure 1).

With the exception of Landcare Research (Bioeconomy Science), who undertook the survey, MGL's experts received the 2025 data a week later on 17 March.

Mr Harding requested additional information relating to the search area and timing of the survey on 18 March. This information was provided by email on 18 March.





From: Mike Harding [REDACTED]
Sent: Wednesday, 18 March 2026 9:30 am
To: Cheryl Low [REDACTED]
Cc: Ann Rodgers [REDACTED]; Fiona Garrett [REDACTED]
Subject: Spring Annual Survey Data

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Morning Cheryl,

Thank you for the workshop notes and the responses to issues raised at the workshops. They are very helpful.

Thank you also for the spring annual survey data.

It appears that the report describing the spring annual survey data will not be available. Further information is needed to adequately interpret/analyse those data. If the report is not available, I wonder if that information can be made available separately, please? In particular:

- The geographic extent of the survey (a shapefile would be ideal).
- The timing of the survey.
- The survey effort (person hours).

Many thanks
Mike Harding

Mr Zac Milner (RMA Ecology) was engaged to review the 2025 spring annual survey data ahead of expert conferencing in April, after all experts had received the data.

Spring Annuals Survey 2026

(Statement of Geoffrey Rogers on Behalf of Sustainable Tarras 7 September 2025 and CODC Statement of Supplementary Evidence of Michael Harding Terrestrial Ecology 20 August)

Mr Harding and Mr Rogers made statements regarding the need for a 2026 spring annual survey and its scope.

A substantial 2026 Spring Annuals survey of approximately 2500ha (compared to 847ha in 2025) is scheduled to commence towards the end of September 2026, with the start date dependant on emergence of the annuals. It will include areas of suitable habitat in the DDF, Ardgour Restoration Area, DOC reserves and accessible areas of Bendigo Covenant Area and private land. The methods of the survey will be consistent with those used in the 2025 survey.

The survey will also include:

- additional time for skilled botanists to visit areas within the wider region where species have been found prior or contain suitable habitat (23 sites potential sites have been identified), targeting priority species and recording presence/absence and rough population size/area of suitable habitat; and



- feasibility assessment of using drone imagery to identify and or count spring annual species.

The survey is being undertaken to enable mining of the Come-in-Time pit, by expanding the known population of *Ceratocephala pungens* and *Myosotis brevis*, so that no more than 1% of each population occurs within the CIT pit footprint. It will be undertaken by experienced personnel several of whom were part of the 2024 and 2025 surveys and two who are recognised spring annual experts.

Mr Harding notes (paragraphs 7 and 8) that the 2025 survey was undertaken by people who are among the most experienced and skilled dryland ecologists in the country And was the most comprehensive and probably the most extensive survey of dryland spring annual species in recent years. It provided data that are invaluable for our understanding of the numbers, distributions and biology of these cryptic species.

The 2025 survey benefited from adequate resources and favourable seasonal conditions to increase the known populations of *C. pungens* (Threatened Nationally Critical) by 20 times and *M. brevis* (Threatened Nationally vulnerable) by 2 times. The 2026 survey will cover more than three times the area of the 2025 survey and recent weather conditions and site inspections indicate another favourable season for germination.

Grazing as part of biodiversity protection practices

(Statement of Geoffrey Rogers on Behalf of Sustainable Tarras 7 September 2025)

Mr Rogers expressed concern about replacing farming land use with biodiversity protection practices.

Maintenance of grazing in cushionfields and spring annual habitat is recognised as a necessary management practice to maintain these vegetation types, notwithstanding that the expansive cushionfields in Otago are in a large part a natural response to fire or historic ¹, generally by rabbits²

The Ardgour Restoration Area Management Plan and Landscape and Ecological Rehabilitation Management Plan describe the use of grazing (sheep and rabbits) to

² (Applied Research Plan for Cushionfield Manaaki Whenua Landcare Research 2025, JWS Reconvened Ecology: Terrestrial Vegetation, June 2026).

achieve biodiversity uplift and rehabilitation outcomes including sustaining of cushionfields and spring annuals.

Compensation for cushionfields and spring annuals

(Statement of Geoffrey Rogers on Behalf of Sustainable Tarras 7 September 2025)

Several submitters have noted the experimental nature of cushionfield in rehabilitation. MGL has submitted an Applied Research Plan (ARP) to further understand the ecology of cushionfields and spring annuals to support rehabilitation and ecological uplift outcomes.

Like all research programs the ARP has an end point. However, this does not prevent the continuation of the program or new research programs being developed as knowledge gaps are defined and understanding is developed.

Mr Geoffrey Rogers for Sustainable Tarras raises concerns regarding the use of the term "may" regarding compensation (paragraphs 51-52). Since the compensation is to be developed in consultation with Peer Review Panel, CODC and ORC at the end of the programme (ten years) it is appropriate for the collective decision to be made at that time using current information.