

**BEFORE THE EXPERT PANEL**

<b>IN THE MATTER</b>	of the Fast-track Approvals Act 2024 ( <b>FTAA</b> )
<b>AND</b>	
<b>IN THE MATTER</b>	of an application for approvals under the FTAA for the Bendigo-Ophir Gold Project FTAA-2507-1089

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**MEMORANDUM OF COUNSEL FOR ENVIRONMENTAL DEFENCE SOCIETY INC (CROSS-EXAMINATION TOPICS FOR ECOLOGY, 12 JUNE 2026)**

10 June 2026

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## **Introduction**

1. This memorandum is filed by the Environmental Defence Society Inc. (**EDS**) in response to Minutes 30 and 33.
2. Leave is sought for focused cross-examination on the following topics for ecology, on the proviso that the Panel may well have addressed some or all of the relevant matters that Counsel wish to raise in questions.
3. In the interests of time and efficiency, it is likely that Counsel will focus questions to particular witnesses, rather than all participants, with a focus on terrestrial vegetation experts, including (but not necessarily limited to):
  - a. Dr Matt Baber;
  - b. Emeritus Professor David Norton;
  - c. Robyn Simcock;
  - d. Zac Milner;
  - e. Geoff Rodgers; and
  - f. Mike Harding.
4. However, this will depend on responses provided by experts to questions from the Panel.
5. Relevant topics have been identified at a comparatively high level from the Terrestrial Vegetation Joint Witness Statements (25 May 2026 and 2/3 June 2026) as follows:
  - Issue A – Baseline assessments**
  - Issue B – Use of EclAG**
  - Issue E – Magnitude of effects and overall impact assessment**
  - Issue G – Commencement of Come-in-Time pit**
  - Issue O – Performance measures for restoration areas**
  - Issue Q – Long term rehabilitation**
  - Issue S – Adequacy of proposed compensation actions**
6. Further relevant topics may arise from the Effects Management Joint Witness Statement, to be issued by 6pm on Thursday 11 June. These topics will be advised by 9am on Friday 12 June, in accordance with Minute 33.

**Dated** this 10 June 2026