

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 seeking leave
to cross examine under Section
58(1)(e)**

Dated: 16 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**) seeking leave from the Expert Panel under Section 58(1)(e) of the Fast-track Approvals Act 2024 to cross examine at the planning hearing on 18 June 2026.
2. Counsel proposes to cross examine only to the extent that the matters outlined below are not addressed through questions from the Expert Panel during the hearing.
3. Given that, this request is made on a conservative basis and may not ultimately be required.
4. Counsel seeks leave from the Expert Panel to conduct focused cross examination on the following topics:
 - (a) management plan approach;
 - (b) consistency with planning documents;
 - (c) biodiversity and heritage fund;
 - (d) hazardous substances;
 - (e) duration of approvals; and
 - (f) consistency with Part 2 of the Resource Management Act 1991.

Dated 16 June 2026



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