BEFORE THE EXPERT PANEL **FTAA-2507-1089**

UNDER Fast-track Approvals Act 2024

IN THE MATTER of the Bendigo-Ophir Gold Project

SUBMISSIONS OF COUNSEL FOR NEW ZEALAND FISH & GAME COUNCIL AND OTAGO FISH & GAME COUNCIL FOR HEARING ON 29 – 30 APRIL 2026

Dated 29 April 2026

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TO THE EXPERT PANEL

1. The New Zealand Fish & Game Council is a statutory body established under the Conservation Act 1987. It is responsible for the management and enhancement of sports fish and game bird resources in New Zealand. The relevant regional Council is the Otago Fish & Game Council. In accordance with the Councils' statutory functions, Fish & Game represents the interests of anglers and hunters in the statutory planning process, advocates for the protection of fish and game habitats, and monitors ecosystems for their suitability as fish and game habitats.[1]

2. Its comments on the Bendigo-Ophir Gold Project substantive application therefore focus on the project's effects and risks, in the short, medium and long-term, on freshwater quality, aquatic ecology and sports fish and game resources. Fish & Game is impartial regarding the activity of mining itself.

3. These submissions summarise the issues raised in Fish & Game's comments and supporting reports, and the extent to which these matters remain in dispute following consideration of the applicant's reply and RFI responses.

Assessment of waterbodies within the BOGP site

4. The ecological value of streams within the site remains a live issue.

5. The applicant describes water quality within the site as impacted. Dr Ryder maintains that view[2]; where-as Ms McArthur maintains the available monitoring results indicate good water quality[3] - this is expected to be an issue discussed at expert conferencing.

6. Dr Ryder and the applicant also place significant weight on the lack of fish in streams within the site.[4] Fish & Game disagrees that the presence or absence of fish is of any particular moment: no reference sites have been assessed to compare ecological values with those at the project site and Fish & Game expects that these stream types would naturally not contain fish, so the lack of fish presence does not indicate poor quality habitat.

7. This assumption that lack of fish means low habitat value is also an issue with the Boffa Miskell's Stream Ecological Valuation Assessment presented as part of the applicant's reply documents. The SEV Assessment is based on Auckland Council's methodology for Auckland streams.[5] The author acknowledges that "The SEV methodology enables the overall ecological function of a stream to be assessed and compared with other streams in the Auckland Region" [6] and that "As the SEV methodology has not been adapted for the Otago region, representative SEV reaches are typically required to provide appropriate bioclimatic comparisons."[7] However, it says that "[d]ue to time constraints associated with this assessment, reference SEV reaches were not assessed. Instead, surrogate reference scores have been estimated

[1] Sections 26Q(1)(e), 26Q(1)(e)(vii) and 26Q(1)(a)(iii) Conservation Act
[2] Ryder Reply to comments at 38-39
[3] McArthur at 39 – 42
[4] Ryder Reply to comments at 38-39
[5] Stream Ecological Valuation (SEV) methodology (Auckland Council Technical Report 2011/009)
[6] Page 2
[7] Page 2 and 8

based on the *potential* condition of Shepherd's Creek, Rise and Shine Creek and Bendigo Creek." This is acknowledged to be "a relatively bespoke approach" to generating SEV scores,[8] i.e. not one the SEV method recognises. The "potential" scores include the assumption fish would be present throughout the reaches – which is an unsupported assumption that is then used to justify assigning low values to the streams in their current state. No reliance can be placed on the SEV assessment given these methodology weaknesses.

Assessment of receiving environment

8. The Project is situated upstream of waterbodies that have good water quality and significant freshwater values, both in terms of their instream values (trout fishery, indigenous fish) and human use values (irrigation, frost control, drinking water).[9] Mr Trotter and Mr Paragreen's statements describe the sports fish habitats and resources.[10]

9. Fish & Game's Comments noted water quality issues in the Lindis River and that the provision of a minimum flow in the lower river from October 2026 is expected to reduce the impacts of abstraction and improve fishery and angling amenity values. Fish & Game submitted that when considering the Project's effects, it is relevant to consider the future environment as modified by the full implementation of those consents (a less impacted river with improved fishery and angling amenity values). Dr Ryder says it is "good to see Fish & Game acknowledge this improvement because they argued strongly in the Lindis Environment Court hearing that this would not occur".[11] While largely an irrelevant side issue, Fish & Game wishes to respond to Dr Ryder's contention that it takes different positions in different proceedings; because it is not correct. Fish & Game's position in the consent hearing was that the consent conditions should provide for the minimum flow specified in the decision by Independent Commissioners on PC5A rather than the much lower minimum flow sought by the irrigators. Its position compared those two scenarios, and did not say that the irrigators' minimum flow would not be an improvement on the existing state.[12]

10. Existing water quality in the surface and groundwater receiving environments was not described in the application documents and the adequacy of its assessment remains a live issue. The applicant has provided additional data regarding potential concentrations occurring in these surface waterbodies via contaminants discharged from Shepherds Creek in its reply evidence – addressed below.

Game bird resources

11. Mr Trotter and Mr Paragreen's statements describe game bird (waterfowl and upland game) resources that are hunted in the area surrounding the BOGP

[8] Page 8
[9] Fish & Game Comments at 18; McArthur statement at 91.
[10] Summarised in Fish & Game's comments at 19 - 25
[11] At 41
[12] Closing legal submissions for Otago Fish and Game Council dated 2 April 2019 at 2-5.

including Bendigo Wildlife Management Reserve.[13] These matters appear undisputed.

Effects on water quality, freshwater ecology and human health

Water quality

12. The application materials did not include an assessment of concentrations of potential contaminants of concern (PCOC) in downstream waterbodies. The application materials did not assess the Project's impacts on instream and human use freshwater values and overlooked critical impacts including the potential for bioaccumulation of contaminants in trout (or other fish) and game birds which may be harvested and eaten by people.

13. The applicant has now modelled maximum predicted solute loads from years 50 to year 200[14] and converted those loads to concentrations at median flows and MALFs in the Lindis at Ardgour and Clutha.[15] Ms McArthur requested the data used to inform the load modelling on 23 April but has not yet received this information: Dr Weber advises that MGL is pulling the datasets together and will provide them this week. At this point, this remains a live issue.

14. The modelled load outputs depend on assumptions as to seepage capture, treatment effectiveness and groundwater movement, which remain in dispute. The potential for seepage of untreated contaminants to enter the receiving environment via groundwater has not been addressed. Uncertainty remains with respect to the applicant's ability to treat and meet modelled concentrations and loads in the receiving environment and with respect to the potential for localised effects in the Mata-au Clutha and Bendigo Wildlife Reserve where contaminants will not be mixed with the full flow of the Clutha River.[16]

15. Importantly, Dr Weber has re-assessed the peak solute load year as year 85 (previously year 27)[17] and advises that active water treatment will now be required until year 85[18] (elsewhere, year 90 is also stated[19]). This has implications for certainty of effective active and passive treatment over such a long duration, as well as the closure conditions, long-term project costs and bond. The appropriateness of authorising an activity with such an enduring contamination profile – requiring ongoing management for more than 3 generations - remains a significant issue.

Bioaccumulation

16. Bioaccumulation risks were raised in two contexts: (i) contamination of trout, game birds and sediments in downstream receiving environments, and (ii) contamination of game birds from direct contact with contaminated pit lake water. Dr Ryder contends downstream bioaccumulation is unlikely to be an

[13] Summarised in Fish & Game's comments at 27-28
[14] Weber response to comments
[15] Ryder response to comments at 28-30
[16] Ryder Response to comments 21 – 26, and 28 .
[17] Page 3 of Memorandum attached to Mr Weber's statement
[18] Weber response to comments at 60(l)
[19] Page 10 of Memorandum attached to Mr Weber's statement says that active treatment to year 90 is required in order for SO_4 to naturally stabilise below the 250 mg/L [groundwater] compliance limit

issue due to the large turnover of water in the Clutha River[20] and says it will be addressed through monitoring recommended by Rekker.[21] In response, Fish & Game observes that:

a. Dr Ryder is not an ecotoxicologist. This is a specialist area, and Fish & Game strongly recommends that the Panel seek independent, specialist, ecotoxicology advice.

b. As noted above, the many slow-moving backwaters within the Bendigo Wildlife Management Reserve do not experience the same turnover as the full flow Clutha main channel.

c. Dr Rekker does not propose tissue toxicity and bioaccumulation monitoring.

d. Dr Ryder says that "the risk of contaminants accumulating in the Reserve is "very low, as outlined in the evidence of Dr Paul Weber".[22] Dr Weber's evidence says only that build-up of contaminants in sediment is to be addressed by a monitoring programme.[23]

   As such, bioaccumulation risk in the receiving environment remains a live issue.

17. Bioaccumulation in game birds from contact with the pit lakes (raised in Dr Webster-Brown's evidence) which may then be harvested (as described in Mr Paragreen's evidence) is addressed optimistically in the applicant's legal submissions:[24]

> Mr Lurling considers that if this did result a minor level of effect on avifauna this could be addressed by actions to reduce the attractiveness of the pit lakes to waterfowl including by modifying the shallow margin where the haul road enters. This could easily be achieved by, for example, placement of large rocks to limit avifauna access to shallow water and sediment and to discourage the establishment of marginal vegetation.

18. Mr Lurling does not assess this potential effect as such: he acknowledges that elevated concentrations of trace metals such as arsenic are known to bioaccumulate through aquatic food webs and can adversely affect birds via dietary exposure, including impacts on growth, reproduction, and survival, but says bioaccumulation is outside his expertise. He notes the potential to modify shallow pit lake margins as a mitigation measure but does not provide an opinion on the effectiveness of such measures in deterring birds' use of pit lakes.[25] In Fish & Game's experience, birds land on lakes regardless of the depth of the water. Bioaccumulation following direct contamination remains a live concern.

Trout

19. Dr Ryder considers trout spawning values are unlikely to be affected because "the majority, if not all, of the spawning" takes place upstream of the lower

[20] Ryder reply to comments at 34
[21] Ryder reply to comments at 32 and 34
[22] At 35
[23] Weber reply to comments at 71(c) and 72
[24] Legal submissions at 311
[25] Lurling reply to comments at 22-23

Lindis and under higher flows when concentrations are more diluted.[26] Some spawning occurs in areas that interact with groundwater from Shepherds Creek, so "the majority" (not "all") is correct. In addition, the lower reaches are important juvenile rearing habitat[27], and spawning trout need to migrate through the lower reaches of the Lindis to reach spawning grounds. The extent of risks to trout is also contingent on concentrations of PCOCs, which is related to the question of water quality limits, now addressed.

Proposed water quality limits

20. The applicant's proposed water quality limits do "the bulk of the heavy lifting" in managing adverse effects of discharged waterborne contaminants on the receiving environment. The limits serve multiple compliance and monitoring purposes as set out by Ms McArthur, including identifying when significant adverse effects on aquatic life may arise, defining treatment system design, treatment duration, informing adaptive management, and more. If they are not set at the right level, or if non-compliance is not picked up, or cannot be remedied effectively, the environment will be significantly impacted.

21. The proposed water quality limits remain a very significant concern, based on a wide range of technical issues from characterisation of existing water quality to species protection and modelled effects. Of fundamental concern is that the limits allow for substantially greater contamination than: (i) modelled impacts and (ii) existing water quality.

22. The new Weber/Ryder modelling of receiving environment contaminant concentrations models concentrations resulting from the solute loads predicted by Dr Weber, not the limits proposed by Dr Ryder. Concentrations of PCOS in receiving waterbodies *at the proposed consented limits* have not been modelled. The limits are generally set much higher than both predicted concentrations and existing concentrations in downstream waterbodies. For example, the recommended compliance limit for nitrate-nitrogen concentration (NO_2-N) is 3.5 mg/L.[28] Acknowledging that dilution will occur between Shepherds Creek and the Clutha River, it notable that the existing NO_3-N concentration (Clutha at Luggate Bridge) is just 0.05 mg/L[29] - 70 times lower than the proposed limit. The downstream PCOC concentrations predicted from leaching at the proposed consented limits is unknown. The concentration at which the proposed limits are set is high and would result in significant adverse effects on waterbodies.

23. Even if a trigger option at "50% of limit with increasing trend" is adopted as recommended by Weber,[30] this would allow a significant increase in PCOC because the limits are so high. There are additional technical difficulties with a trigger option that requires a trend analysis (expected to be addressed at conferencing).

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[26] Ryder reply to comments at 36
[27] Trotter statement at 12.
[28] No compliance limits for maximum concentrations of PCOCs at receiving environment monitoring sites have been put forward by the applicant.
[29] McArthur statement, Table 1 (p15).
[30] Weber RFI response 14eiii.

24. Dr Ryder also relies on macroinvertebrate monitoring with triggers[31] for early warning of issues. This is not considered effective by Fish & Game (for reasons to be addressed at conferencing).

25. Fish & Game therefore strongly disagrees that the proposed compliance and performance monitoring programme provides confidence that any unforeseen trends will be identified well before a potential adverse outcome occurs, or will provide protection for water users.[32]

26. The applicant submits that:

> Fish and Game's expert, Ms McArthur, considers that the on-site water bodies have been mischaracterised as they have failed to take into account the receiving environment, and therefore the level should be 95% for a slightly to moderately disturbed ecosystem.

27. That is not accurate. Ms McArthur's evidence is that the proposed water quality limits are not calibrated to the condition or values of the receiving environment <u>at the site or in the wider receiving environment</u>.[33] Outstanding issues with proposed limits include:

    a. Species protection level. The applicant's experts say these waterbodies are not "pristine."[34] That has not been claimed. A 95% species protection level correlates to "slightly or moderately disturbed ecosystems", not pristine,[35] and should be adopted.

    b. Lack of alignment with ANZG. The applicant's legal submissions[36] defend the lack of alignment of Dr Ryder's limits with ANZG. Fish & Game agrees ANZG do not have legal status, but disagrees Dr Ryder's evidence should be preferred, certainly not based merely on his CV. There is no analysis to support Dr Ryder's statement that his approach in deviating from ANZG is "relatively conservative".[37]

    c. Differentiated groundwater and surface water limits in an interconnected hydrological system.

    d. Misuse of existing exceedances. The fact there are a very few exceedances of the 95th percentile currently for two contaminants at one monitoring site does not justify setting all parameters at all sites at 90th percentile.

    e. Limits are proposed for nitrogen toxicity, not ecosystem health and trophic state.

    f. Additional issues are set out in Fish & Game's comments and Ms McArthur's statement.

28. If the approvals are granted, it is essential that the limits are set in the consent conditions, not in a management plan as currently proposed. Water quality

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[31] G.13 Monitoring Plan
[32] Applicant legal submissions at 366
[33] At 17
[34] Boothroyd at 38 and 40; Ryder RFI response at 12 and 15at
[35] McArthur statement at 125
[36] At 349
[37] Ryder RFI reply at 17 and McArthur Appendix 1.

limits are essential parameters that must be fixed by the Panel not delegated to a management plan certifier.[38]

Monitoring sites

29. Ms McArthur advises that surface water monitoring sites now proposed in downstream waterbodies[39] appear to be acceptable (to be confirmed through conferencing).

Site management and water treatment

30. Management of trace metals in sediment is through the ESC plan, but only monitoring is required, with no management responses if sediment is elevated in metals and then released back into the mine environment (as dust suppressant) or into the receiving environment (when sediment ponds are overwhelmed). Risks around the use of pit sump water for dust suppression remain: this is to be addressed through "adaptive management" with no explanation of what is proposed or what "minimising" these risks means.

31. The effectiveness of active water treatment (now anticipated to be required until year 90) and the lack of any detail as to what passive water treatment entails remain live issues. The applicant's legal submissions say that "the multi-stage passive treatment system is comprehensively outlined in B.06 Mine Waste management Limited – Mine Impacted Water Overview Report".[40] The passive treatment system is described in half a page, with no supporting detail, and can hardly be described as comprehensive. Passive treatment systems are experimental, and not well understood, especially in this context.

Section 107 RMA

32. The applicant submits s 107 RMA is not engaged because:

    a. the aquatic life in the directly affected watercourses is limited to macroinvertebrates with no fish present;

    b. the proposed water quality compliance limits and monitoring regimes will protect both local and wider receiving environments;

    c. contaminant modelling demonstrates that the wider environment (Lindis River, Clutha River / Mata-Au, Lake Dunstan) will be protected to a high level.

33. Fish & Game disagrees with the relevance of a. (see paragraphs 6-7 above), disagrees with b. for reasons summarised in paragraphs 20-28 above, and reserves its position on c. pending consideration of data used for contaminant load modelling and a more comprehensive assessment of the risks of

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[38] *Turner v Allison* (1970) 4 NZTPA 104; *Wellington Fish and Game Council v Manawatu-Wanganui Regional Council* [2017] NZEnvC 37 at [175] (maximum authorised nitrogen leaching over time is a fundamental parameter and as such consent conditions, not management plans, must set the nitrogen leaching limit. Allowing the nitrogen leaching limit to be "updated" would leave a key decision to a later date and allow the consent authority's Regulatory Manager to operate as a decision maker, offending against the *Turner v Allison* principles.)

[39] Rekker Appendix 2

[40] Legal submissions at 340

additional contaminant sources emanating from the project site. Whether the Panel can be satisfied of the matters in s 107 remains a live issue. Section 107 should be given significant weight by the Panel, given that in a RMA context it is a pass/fail criterion with a very high certainty threshold.

Adaptive management

34. Fish & Game maintains that the applicant's approach to "adaptive management is inconsistent with the requirements outlined by the Supreme Court.[41]

TSF failure risk management

35. Fish & Game's Comments raised issues with:[42]

    a. the extent to which information should be before the Panel for determination now rather than being deferred to a post-consent process. In summary, Fish & Game considers that critical information about TSF design is proposed to only be provided at detailed design stage or mine closure stage.

    b. Assumptions regarding relinquishment of responsibilities.

    c. Mine closure criteria.

36. The issues raised in Fish & Game's comments are not resolved. Assumptions about mitigation to be delivered through detailed design underpin conclusions about dam failure risk – these matters are too fundamental to leave to a later stage. Fish & Game contends that consistency with the Dam Safety Guidelines[43] should be demonstrated before consent could be granted.

37. Fish & Game's comments relied on the *Eyre* interim decision[44] in which the Court required the applicant to convince it that its proposal was in accord with the 2015 Dam Safety Guidelines,[45] stating "While the design of the ponds might be approaching acceptable, their construction is of equal importance."[46] The Court required a level of information that might normally be considered to be in the nature of detailed design (e.g. clarification around the testing and acceptance of the standard geomembrane liner[47] and details of instrumentation for pond monitoring[48]).

38. The applicant submits that *Eyre* can be distinguished. Fish & Game disagrees. The applicant's reasons and Fish & Game's responses are addressed below:

    a. *Applicant:* In *Eyre* draft management plans were submitted – the Court required these to be developed into detailed peer review

[41] Fish & Game Comments at 63
[42] Fish & Game Comments at 81 - 99
[43] Relevant principles are set out at paragraph 91 of Fish & Game's Comments
[44] *Eyre Community Environmental Safety Society Inc v Canterbury Regional Council* [2016] NZEnvC 178
[45] Eyre [2016] at 96.
[46] *Eyre* [2016] at 128.
[47] At [165]
[48] At [170]-[173]

documents where as the BOGP application includes detailed, final and peer reviewed management plans.

Response: the BOGP management plans are not final. Management plans must implement consent conditions. The consent conditions have not been confirmed. In any event, the state of management plans was not central to the Court's reasoning on the need to demonstrate consistency with the NZDSG.

The Court's primary reasoning was that there were a number of issues and methods relating to safety from catastrophic breach of pond embankments that made it "appropriate to have available more detailed information about the design, construction, operation and maintenance of the proposed structures than might be considered common for such projects".[49]

b. *Applicant:* In *Eyre* the dam had been designed using the 2000 NZDSG guidelines and the updated 2015 NZDSG guidelines were released during the hearing.

Response: factually correct but irrelevant. By the time of the Court's interim decision it had already adjourned the hearing to enable new evidence briefs and expert engineering and seismic conferencing to address the 2015 Guidelines.[50] At the interim decision stage, the Court was considering whether to simply include a condition requiring dam safety to be managed in accordance with the Dam Safety Guidelines[51] or whether additional information was required specifically addressing the feasibility of proposed management methods (such as an auto-sensory system to alert the dam manager in the event of a developing dam breach) and systems.[52] The Court took the latter approach.

c. *Applicant:* In *Eyre* the Building (Dam Safety) Regulations 2008 were revoked by the Building (Dam Safety) Revocation Order 2015 and at the time of the hearing dam safety was, according to MBIE, to be managed under the RMA.

Response: the Court did not see this as relevant. It described the MBIE statement (advising that dam safety was now to be managed under the RMA) as "a little mystifying" and said this was "something of a side-wind" because "the over-arching duty of a consent authority… to consider Part 2 RMA matters [including health and safety around dams] has historically been present and remains so, despite the presence of other regulatory regimes".

39. With respect to outstanding information that Fish & Game submits should be required now:

[49] At [21]
[50] At [41]-[45]
[51] At [54]
[52] At [70]

a. Matuscha confirms there will be enough waste rock to buttress the initial tailings dam prior to deposition of tailings,[53] but does not go on to confirm that there will be enough rock to buttress each of the TSF raises, and no condition requires this.

b. Despite stating on multiple occasions that a minimum FoS of 1.5 will be achieved[54] the applicant has not volunteered a condition requiring this, it is not clear whether this is currently achieved near the RAS pit bordering conservation land,[55] and despite application documents identifying a post-earthquake FOS of 1.2[56], none of the applicant's experts address how this will be increased to 1.5 if an earthquake occurs post-closure. No FoS limit is given as a closure criterion.

c. Mitigation for landslide risk: The applicant and ORC geotechnical consultants agree that landslides present a risk of failure while the TSF is being constructed and during operations,[57] yet landslide mitigation is to come at detailed design stage. In reply, Matuschka addresses this for the TSF[58] and O'Bryan for pit excavations.[59] Both give information on the level of risk and mitigations, but firm choices are left until detailed design. While the applicant's legal submissions contend the risk is low[60] this is highly dependent on mitigation, which Fish & Game contends should be firmed up now and addressed in consent conditions.

d. Effective emergency preparedness and response procedures should be in place and Planning and Provision for Closure should be more fully developed to ensure long-term environmental safety. Repair and maintenance obligations (and associated funding) must continue, effectively in perpetuity.

40. The mine closure conditions defer all relevant details to the Mine Closure Plan which is unlawful. The completion criteria in the Mine Closure Plan are vague and "considered preliminary". These issues are not remedied by the new conditions requiring the Mine Closure Plan is prepared at an earlier stage.[61] The applicant's legal submissions assert that:

> 339 … The conditions together with the Water Management Plan outline that the transition from active to passive water treatment can only occur once contaminant loads have been demonstrated to have reduced to pre-determined levels that are known to be manageable by passive treatment systems. This provides certainty that active treatment will remain in place until the identified limits are met, and provides certainty that downstream water quality limits will be met.

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[53] Matuschka s 53 reply at 47, 48, 23-31, 32
[54] Applicant legal submissions at 176
[55] O'Bryan Reply to comments at 17.
[56] TSF SEE: B.21, Table 6, pg 55
[57] B.21 Table 7 Potential failure modes (FM7); Geosolve, 20 March 2026, Geosolve Ref: 240480.03, pages 1 - 2
[58] Matuschka Reply to comments at 37
[59] O'Brien Reply to comments at 23
[60] At 173-175
[61] C115-C118 Common Conditions

41. However there are no “pre-determined levels”, nothing requiring that those levels are “known to be manageable by passive treatment systems” and no “identified limits” – as such there is no certainty that downstream water quality limits will be met (and as set out above those limits are set well above existing contaminant concentrations in receiving waterbodies).

Bond and insurance

42. The applicant has provided additional details of how the bond would operate and broadened its scope. However, Fish & Game remains concerned that:

    a. Matters that Mr Lane says will be covered by the bond (e.g. routine annual inspections) are not required by the consent conditions.

    b. The bond scope does not provide for TSF/ELF repairs, which could involve very substantial costs.

    c. Condition C123 still provides that the bond methodology will follow the Lane report, but the Lane report which does not contain a “methodology” section) is completely unsuitable as the basis for a comprehensive bond.

    d. Everything rests on the future owner of the site and the bond guarantor, given the applicant’s stated intention to relinquish the site and its responsibilities.

    e. The applicant say it will obtain insurance, but the conditions do not require this or set out any scope for what that insurance must cover.

Covenant Revocation

43. Fish & Game relies on its Comments with respect to the partial Covenant Revocation.[62]

Section 85(3) assessment

44. Fish & Game maintains that the Project involves very significant adverse impacts that may be sufficiently significant to be out of proportion to the Project’s benefits, as set out in its Comments.[63]

29 April 2026

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[62] At 122 - 125
[63] At 126-127