

BEFORE THE EXPERT PANEL

FTAA-2507-1089

**UNDER
IN THE MATTER**

Fast-track Approvals Act 2024
of the Bendigo-Ophir Gold Project

**MEMORANDUM OF COUNSEL FOR SUSTAINABLE TARRAS
CROSS-EXAMINATION – HERITAGE HEARING**

Dated 8 June 2026

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TO THE EXPERT PANEL

In accordance with the Panel's Minute 30, Sustainable Tarras seeks leave for counsel to cross-examine Dr Woods on the following topics (subject to the Panel's questions, which may have already covered the ground):

1. JWS Question A: methodology and approach including heritage landscape consideration and relevance of Bendigo Conservation Covenant.
2. JWS Question B: assessment of heritage values significance.
3. JWS Question C: assessment of mitigation and compensation.
4. JWS Question D: conditions and management plan
5. JWS Question E: Proposed new route to Come-In-Time Battery
6. JWS Question F: consistency with objectives of the Bendigo Conservation Covenant
7. JWS Question L: Clause 4 Schedule 8 FTAA
8. JWS Question N: effects of blasting and vibration
9. JWS Question O: survey of heritage associated with Bendigo Creek Willow Control
10. JWS Question P: heritage sites within the Bendigo Sanctuary Area

The Panel's direction for cross-examination to be brief and focussed will be observed.

8 June 2026



Sally Gepp KC
Counsel for Sustainable Tarras Inc