

BEFORE THE EXPERT PANEL

IN THE MATTER of the Fast-track Approvals Act 2024 (**FTAA**)

AND

IN THE MATTER of an application by Matakanui Gold Limited under section 42 of the FTAA for the Bendigo-Ophir Gold Project

APPLICATION NO. FTAA-2507-1089

Memorandum for Director-General of Conservation
re Planning Concurrent Hearing – seeking leave to cross-examine
Dated 16 June 2026

Barrister instructed: Dean van Mierlo; dean@environmentalbarister.co.nz

Pene Williams Senior Solicitor Rōia Matua Department of Conservation Te Papa Atawhai PO Box 5244 Dunedin 9054 Phone: [REDACTED] Email: [REDACTED]	Marie Payne Fast-Track Programme Lead Department of Conservation Te Papa Atawhai PO Box 10420 Wellington 6140 Phone: [REDACTED] Email: [REDACTED]
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May it please the Expert Panel (Panel),

The following matters are submitted on behalf of the Director-General of Conservation (DG):

1. The Planning concurrent hearing is scheduled for 18 June 2026.
2. In accordance with Minute 30, I seek leave to cross-examine the expert witnesses on the following matters:
 - a. proposed condition re spring annuals and Come in Time pit¹
 - b. management plan conditions and certification, including relationship to concessions and wildlife approval
 - c. long-term management of effects including proposed condition re covenant²
 - d. proposed conditions to secure public access during mine operation, including to Bendigo Conservation Area
 - e. concession conditions
3. I may wish to cross-examine on other matters that arise in the concurrent hearing. In accordance with the Panel's directions, I will keep any cross-examination targeted and brief.
4. Thank you for your consideration of this request.



Pene Williams

Counsel for the Director-General

¹ Condition 107 in Applicant's reply – Part 4, D.01 CODC conditions dated 17 April 2026

² Condition 118 in D.01 CODC conditions dated 17 April 2026