

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**

Dated: 22 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**) regarding the Bendigo-Ophir Gold Project (**BOGP**) Fast-track Approvals Act 2024 (**FTA**) application.
2. In accordance with the Panel's directions in Minute 26 Matakanui Gold has filed:
 - (a) updated conditions; and
 - (b) updated management plans.
3. The conditions filed on 17 April 2026 as part of Matakanui Gold's response to comments incorporated amendments arising from:
 - (a) Regulator workshops that took place in February and March 2026; and
 - (b) Section 53 comments.
4. The updated conditions and management plans accompanying this memorandum now incorporate additional amendments arising from:
 - (a) Expert conferencing and resulting Joint Witness Statements.
 - (b) Discussion at the concurrent hearings held between 8 – 19 June 2026.
5. While updates have been incorporated to reflect matters raised during the expert conferencing and concurrent hearings, it is acknowledged that the full extent of these matters has not have been captured following the conclusion of the hearings on 19 June 2026 necessitating the need for further workshopping

Proposed Workshopping

6. At the hearing held on 18 June 2026, Mr Chrisp proposed that a further workshopping process on conditions between the planning experts for iwi, the regulators and the Section 53 parties would be beneficial.
7. Matakanui Gold agrees that this would be a valuable exercise that would assist in developing a suite of conditions that will best support the Panel in its decision-making process. It is proposed that the workshopping would be undertaken by planning experts who would seek input from their clients and other technical experts on an as needed basis.

8. The workshops would likely be held in person with the ability for parties and/or their experts to participate remotely. Depending on the subject matter some workshops (for example, those relating to ORC matters) could be held in Dunedin to better accommodate relevant participants.
9. As Mr Chrisp describes in his memorandum accompanying the conditions, the proposed workshopping process could follow the indicative process outlined below:
 - (a) The parties be given a defined period to review the updated conditions and management plans filed on 22 June 2026.
 - (b) That Matakanui Gold or Chancery Green (as directed by the Expert Panel) convene a series of workshops on the management plans and conditions.
 - (c) A week after the workshopping period concludes Mitchell Daysh provides a post workshopping version of the management plans and conditions to the Expert Panel that identifies:
 - (i) any remaining areas of disagreement between the parties; and
 - (ii) the amendments made through the workshopping process.
 - (d) A week following the provision of the post workshopping version of the management plans and conditions Mitchell Daysh provides a clean version of the final proposed conditions and management plans to the Expert Panel.
10. Counsel indicates they will seek directions regarding this in due course once the conditions and management plans have been filed on 22 June 2026.

Documents Accompanying this Memorandum

11. The following documents accompany this memorandum and will be uploaded to the portal on 22 June 2026:
 - (a) Joint expert response to the Expert Panel's request for information in Minute 29 on groundwater.
 - (b) Legal submissions in response to the Expert Panel's request for information in Minute 29.
 - (c) Updated conditions and approvals in accordance with Minute 26.

- (d) Updated management plans and new management plans arising from expert conferencing as set out in **Appendix 1** in accordance with Minute 26.

Dated 22 June 2026

A handwritten signature in blue ink, appearing to read 'Joshua Leckie', is written in a cursive style.

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

Appendix 1

Number	Title
G.01	Water Management Plan track version (22 June 2026)
G.01	Water Management Plan clean version (22 June 2026)
G.03	Habitat Impact Management Plan track version (22 June 2026)
G.03	Habitat Impact Management Plan clean version (22 June 2026)
G.04	Avifauna Management Plan track version (22 June 2026)
G.04	Avifauna Management Plan clean version (22 June 2026)
G.05	Lizard Management Plan track version (22 June 2026)
G.05	Lizard Management Plan clean version (22 June 2026)
G.06	Terrestrial Invertebrate Management Plan track version (22 June 2026)
G.06	Terrestrial Invertebrate Management Plan clean version (22 June 2026)
G.07	Landscape and Ecological Rehabilitation Management Plan Part A track version (22 June 2026)
G.07	Landscape and Ecological Rehabilitation Management Plan Part A clean version (22 June 2026)
G.07B	Landscape and Ecological Rehabilitation Management Plan- Appendices track version (22 June 2026)
G.07B	Landscape and Ecological Rehabilitation Management Plan- Appendices clean version (22 June 2026)
G.08	Ardgour Restoration Area Management Plan track version (22 June 2026)
G.08	Ardgour Restoration Area Management Plan clean version (22 June 2026)
G.09	Matakanui Sanctuary Management Plan track version (22 June 2026)
G.09	Matakanui Sanctuary Management Plan clean version (22 June 2026)
G.10	Mammalian Pest Management Plan track version (22 June 2026)
G.10	Mammalian Pest Management Plan clean version (22 June 2026)
G.11	Biosecurity and Plant Pest Management Plan track version (22 June 2026)
G.11	Biosecurity and Plant Pest Management Plan clean version (22 June 2026)
G.12	Biodiversity Outcome Monitoring Plan track version (22 June 2026)
G.12	Biodiversity Outcome Monitoring Plan clean version (22 June 2026)
G.13	Freshwater Ecological Management Plan track version (22 June 2026)
G.13	Freshwater Ecological Management Plan clean version (22 June 2026)
G.14	Erosion and Sediment Control Management Plan track version (22 June 2026)

G.14	Erosion and Sediment Control Management Plan clean version (22 June 2026)
G.15	Engineered Landform Management Plan track version (22 June 2026)
G.15	Engineered Landform Management Plan clean version (22 June 2026)
G.16	Tailings Management Plan track version (22 June 2026)
G.16	Tailings Management Plan clean version (22 June 2026)
G.18	Noise and Vibration Management Plan track version (22 June 2026)
G.18	Noise and Vibration Management Plan clean version (22 June 2026)
NEW	Construction Noise and Vibration Management Plan (22 June 2026)
NEW	Blasting Noise and Vibration Management Plan (22 June 2026)
NEW	Lighting Management Plan (22 June 2026)
G.19	Access Road Construction Traffic Management Plan
G.20	Soil Management Plan track version (22 June 2026)
G.20	Soil Management Plan clean version (22 June 2026)
G.21	Hazardous Substances Management Plan original
G.21 NEW	Hazardous Substances Management Plan (22 June 2026)
G.22	Archaeological and Heritage Management Plan track version (22 June 2026)
G.22	Archaeological and Heritage Management Plan clean version (22 June 2026)
G.23	Air Quality Management Plan track version (22 June 2026)
G.23	Air Quality Management Plan clean version (22 June 2026)