

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

Dated 17 June 2026

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TO THE EXPERT PANEL

1. Yesterday during the Geotech hearing, the Panel Chair asked Professor Emerman whether he had considered the McLaughlin Mine in California. Prof. Emerman said that he had not.
2. Prof. Emerman has subsequently advised that he did not hear the reference to California and assumed the Panel Chair was referring to the McLaughlin's opencast mine near Charleston, New Zealand, which he is aware of but has not studied.
3. Prof. Emerman has studied the McLaughlin Mine in California, and prepared a 2023 report which addresses the McLaughlin Mine (along with other mines). Leave is sought for Prof. Emerman to file a short response (maximum 1 page) to the Chair's question along with the 2023 report, by tomorrow 18 June 2026.

17 June 2026

A handwritten signature in black ink, appearing to read 'Sally Gepp', with a stylized flourish at the end.

Sally Gepp KC
Counsel for Sustainable Tarras Inc