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Bendigo-Ophir Project Panel
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Dear Panel

FTAA-2507-1089 Bendigo-Ophir Gold Project – Response to Minutes 47 and 48

1. The Canyon Vineyard Limited (**Canyon**) has been invited by the Panel to respond to the evidence filed by Matakanui Gold Limited (**MGL**) between 12-17 June and in response to RFI 11, together with a response to the conditions, approvals, and the Heritage and Archaeological Management Plan circulated on 28 August 2026.
2. This submission provides a response to Minutes 47 and 48 on behalf of Canyon and the Thomson Gorge Road (**TGR**) Residents (together, referred to as the **Group**).
3. The Panel has already been apprised of the key “co-existence” issues of Canyon’s operations with the Bendigo-Ophir Gold Project (**BOGP**) in Canyon’s submission filed on 26 June 2026, which established the foundational operational incompatibility between heavy industrial gold mining and established viticultural and hospitality operations in the area, as well as the commercial background of Bendigo Station Limited.
4. In summary, in response to Minutes 47 and 48, it is the Group’s view that:
 - a. The technical reporting that informed the social impact assessment, upon which mitigation measures, subsequent reporting, and engagement strategies have been based, has been fundamentally undermined by the proceedings before the Panel. As such, limited weight may be placed by the Panel on the conclusions reached relating to social impact.
 - b. The proposed Community Liaison Group (**CLG**) is unlikely to have a positive effect, thereby not mitigating adverse effects on social impacts of the BOGP. To date, the Group has not had positive experiences with engagement by MGL. Communications from members of the Group to MGL have not been responded to, even despite the Panel’s encouragement for MGL to engage with members of the Group.

- c. The Group has concerns that the operation of the BOGP will have adverse effects on the Bendigo Aquifer and subsequently adversely affect the Group's access to water.
5. As such, the Group seeks various amendments to the conditions proposed by MGL to appropriately remedy or mitigate the effects of the BOGP on its' properties and established commercial operations.
6. Noting that, the conditions imposed / volunteered to manage and mitigate effects on adjacent residents will affect the implementation of the BOGP (and the claimed corresponding economic benefits).

Comments on MGL's response to RFI 11

7. The Group provides the following general comments on various aspects of MGL's response to RFI 11.

Evidentiary basis of the Social Impact Assessment and Addendum

8. In its response to questions 21 and 22, MGL submitted the October 2025 GHD Social Impact Assessment (**SIA**) and the July 2026 Just Add Lime SIA Addendum. The SIA framework acknowledges that its social ratings are secondary and derivative, relying entirely upon the baseline assumptions of MGL's preliminary technical assessments (relating to landscape, groundwater, transport, air quality, noise, and ecology) and the community engagement conducted in late 2024 and 2025.¹
9. The Group notes that when local residents, businesses, and community groups were surveyed to inform the SIA, their feedback reflected MGL's representations that its proposed environmental mitigations, management plans, and rehabilitation promises were technically feasible and protective. Specifically, the Group notes that responses were made on the assumed baselines that:
 - a. Open-pit mining and waste rock placement would be progressively rehabilitated to blend naturally into the Outstanding Natural Landscape (**ONL**), reducing landscape effects to low-moderate adverse at closure and yielding a low negative social impact;²
 - b. Abstraction from the Bendigo Aquifer would have less than minor drawdown effects on surrounding irrigation and domestic supplies, with mine closure occurring within a short 14-year timeframe;³

¹ GHD Social Impact Assessment (October 2025), at 4.3.3 and 4.3.4.

² See: Landscape, Natural Character and Visual Effects Assessment prepared by Boffa Miskell, dated 26 May 2025,

³ See: Groundwater Existing Environment and Effects Assessment prepared by Komanawa Solutions Ltd and dated 30 April 2025. – Groundwater Bore Take Effects Assessment prepared by Komanawa Solutions Ltd and dated 30 April 2025. – Surface Water and Catchment prepared by Komanawa Solutions Ltd and dated 15 May 2025.

- c. Thomson Gorge Road would be replaced with a safe, compliant, like-for-like public route via Ardgour Rise, resulting in a low negative access impact;⁴
 - d. Exterior lighting would comply strictly with a 10-lux property boundary standard and preserve dark skies, resulting in a neutral social impact;⁵ and
 - e. The CLG would serve as a functional, independent two-way representative forum to mitigate distrust.⁶
10. Since the drafting of these reports (which formed the basis of the community engagement undertaken), the Group notes that formal expert evidence and Joint Witness Statements (**JWS**) before the Panel demonstrate that MGL's promised mitigation and baselines are technically unfeasible or deficient. As such, the Group's submission highlights that as the technical premises (and associated social effects of the BOGP) underlying the social impact assessment have been disproven, the social impact ratings derived from them should be given limited weight.

Water usage and groundwater take effects

- 11. In its response to question 6, MGL supplied a report by Kōmanawa Solutions Ltd based on July 2026 testing.⁷ The Group notes that these pump tests were again conducted during winter dormant recharge, which fail to simulate peak summer drawdown when cumulative stress from consented abstraction is highest. As such, in the Group's view, these tests do not accurately represent year-round water availability of the Bendigo Aquifer. These concerns have previously been raised in s 53 of the FTAA comments on behalf of the Schoolhouse Terrace Services Company Ltd, dated 10 April 2026.
- 12. Water shortages would be catastrophic to Canyon's operations. In a 30°C Central Otago summer, a water outage causes permanent root death in certified organic vines within days.
- 13. Although retrospective conditions have been proposed, these are not adequate in protecting existing consented water uses. Amendments sought by the Group to conditions are contained in **Appendix 1**.

Amendments to conditions proposed by MGL

- 14. The Group's proposed amendments are directed at appropriately remedying or mitigating the effects of the BOGP on its' properties and established commercial operations.
- 15. In particular, the Group seeks amendments to the conditions proposed by MGL to protect residential and rural amenity, the safe and reliable use of local roads and

⁴ See: Integrated Transport Assessment prepared by Stantec, dated 13 May 2025.

⁵ See: Exterior Lighting Report, Cosgroves, May 2025.

⁶ GHD SIA, at 8.2.6, 8.6.2, and 8.6.6.

⁷ Report on Compliant Aquifer Test at BOGP Water Supply Bore Field prepared by Komanawa Solutions Ltd, dated 17 August 2026.

water supplies, the health and safety of residents, visitors, workers, equestrian users, and other road users, and the continued operation of viticultural, hospitality, accommodation, agricultural, and tourism activities. The proposed amendments also seek to safeguard existing and future investment, property values, business continuity, organic production standards, and the reputation and visitor experience on which those operations depend, while providing effective monitoring, response, and enforcement mechanisms if adverse effects on the Group arise.

16. Without limiting the points made by the Group in this submission, proposed amendments to MGL's conditions are outlined below. Proposed amendments to the conditions drafted by the Group are contained in **Appendix 1**.

Noise and blasting

17. The Group are concerned with the effects of the operation of the mine on their amenity and commercial operations. Canyon operates a wedding venue and the residents at 60 Thomson Gorge Road run Ardgour Strawbale B&B.
18. The proposed amendments to the operational noise limits are sought to mitigate the adverse effects of operational noise and blasting on the Group, by restricting noise and blasting to appropriate windows.

Operation of the Community Liaison Group

19. In the GHD SIA and July 2026 SIA Addendum, the CLG is relied on as the primary mitigation mechanism to justify downgrading assessments of adverse social impacts, including loss of social cohesion, lack of trust, fear and anxiety, and community division.
20. In the Group's experience, the MLG has undertaken engagement exclusively as a company-managed information dissemination channel, not a two-way representative body. Presenting it as a mitigation measure for community division or severe reverse-sensitivity effects mischaracterizes its function. The Group understands that these concerns have also been expressed by the COWA in a letter to the Panel, dated 15 January 2026.
21. The Group is unaware of any consistent community representation for Tarras on the CLG. Although the Group comprises residents and commercial operators along Thomson Gorge Road and Ardgour Road, sited on the physical boundary of the BOGP and primary mine access corridor, these residents and business owners have not been approached by, canvassed by, or represented on the CLG.
22. The Group has proposed amendments to conditions to rectify these issues and ensure that the CLG operates as intended.

Water usage, effects on groundwater, and dust mitigation

23. As noted above in comments on MGL's response to question 6, effects of a water shortage on Canyon would be catastrophic and impact its operations. Further effects on other TGR residents include contamination from unsealed road dust affecting the commercial operations of Ardgour Olives.
24. In Canyon's view, D.02 Condition 10 proposes ineffective retrospective compensation. This condition proposes a 40-working-day investigation followed by pump-pulling or re-drilling. In a 30°C Central Otago summer or during spring frost fighting, a water outage causes permanent root death in certified organic vines within days. Post-damage remedies cannot restore established vineyards.
25. Further, given the flow on effects to other consented groundwater uses, conditions should not allow MGL to continue pumping water from the Bendigo Aquifer where groundwater abstraction is suspended. Conditions should require MGL to maintain sufficient water storage to maintain dust suppression in the event that groundwater abstraction is suspended. Where water storage reserves drop and the aquifer is still affected, all dust generating activities must cease.
26. The Group also notes that no maximum abstraction (per day or per year) has been included in the Section 14 Permit for the rate of water take.

Transport

27. Proposed amendments to the conditions seek staging of the transportation upgrades, prior to works commencing on the project site, and enabling the safe use of Thomson Gorge Road and Ardgour Road for residents.
28. The Group understands that evidence before the Panel confirms that SH8 cannot safely accommodate heavy mine transport. The widening and two-way sealing of the SH8 / Ardgour Road intersection and Thomson Gorge Road must be completed before any site work commences.
29. Similarly, Thomson Gorge Road must remain open until Ardgour Rise is fully constructed to minimum design requirements that enable the safe use of that road.

Conclusion

30. For the reasons set out above, the Group considers that the SIA and SIA Addendum do not provide a reliable basis for concluding that the adverse social effects of the BOGP will be appropriately avoided, remedied, or mitigated. The assessments depend on technical assumptions concerning groundwater, transport, rehabilitation, lighting, and community engagement that have been materially qualified or undermined by the evidence before the Panel. Accordingly, the Group respectfully requests that the Panel give limited weight to the conclusions of the SIA and SIA Addendum.

31. The Group has provided proposed amendments to MGL's conditions in **Appendix 1**, seeking to mitigate effects on their properties and commercial operations and ensure that the CLG operates as a genuinely representative and accountable forum.
32. If the Panel is not satisfied that the BOGP's adverse effects can be appropriately avoided, remedied, or mitigated through robust and enforceable conditions, the Group submits that the relevant approvals should not be granted.

Yours faithfully

Todd Walker



Rosie Hill
Principal



Lucy King
Senior Solicitor

