

BENDIGO OPHIR GOLD PROJECT

RFI 11 QUESTION 11b ECOLOGY – SPRING ANNUALS – COMPENSATION MEASURES

(Santana Minerals Limited 17 August 2026)

High-level feedback to CODC from Mike Harding

Adequacy of the Spring Annual Survey

- The letter states (page 3) that the “majority of suitable habitat in the DDF was surveyed either in 2024 or 2025” and that “all of the DDF was assessed for potential habitat and surveyed”. Those statements are misleading; they give the impression that all parts of the DDF have been adequately surveyed. That is incorrect. Access to substantial parts of the DDF was not available at the time suitable for survey of spring annuals. Further, the 2024 (RMA Ecology) survey was undertaken by ecologists who were not experienced in survey of spring annuals.
- The data presented in the letter (pages 3-4) on the proportions of the spring annual species’ populations within and outside the DDF are preliminary data which are based on incomplete surveys. Those data cannot be relied upon to determine the relative importance of the DDF for those spring annual species.
- Therefore, the claims (pages 3-4) that the survey “increased the known population of *Ceratocephala pungens* by 20 times and showed that nearly 60% of the known population is outside the DDF” and “doubled the known population of *Myosotis brevis* and showed that 79% is outside the DDF” are at best misleading and almost certainly incorrect.

Success Criteria

- The letter states (page 5) that “it is considered highly likely that the success criteria can be achieved within the proposed timeframes or that demonstrable progress will be made toward achieving them”. That statement is optimistic. Most experts consider that there is no certainty that the proposed restoration and habitat enhancement measures for cushionfields will succeed.¹

Compensation Measures

- The letter proposes that if the cushionfield (page 6) and spring annuals (page 7) success criteria have not been achieved and are considered unlikely to be achieved by passive mine closure, other areas of suitable cushionfield/spring annuals habitat are purchased and protected. It would be challenging to find other areas of suitable cushionfield/spring annuals habitat now; it is most unlikely that such areas will be present or available for purchase sometime in the future.
- To provide certainty, other areas of suitable cushionfield/spring annuals habitat should be purchased and protected now (prior to commencement of the activity).

Mike Harding

1st September 2026

¹ JWS Terrestrial Vegetation, 2-3 June, para 28.