

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 THE NEW ZEALAND FISH AND GAME
COUNCIL AND OTAGO FISH AND GAME COUNCIL**

Dated 11 June 2026

SALLY GEPP KC

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TO THE EXPERT PANEL

1. The New Zealand Fish & Game Council and Otago Fish & Game Council (together "Fish & Game") request leave to cross-examine the water experts in relation to the assessment of (receiving environment) ecological effects, predicted contaminant load to the receiving environment over time, water quality limits, adaptive management, mine closure criteria, and bioaccumulation.

11 June 2026

A handwritten signature in black ink, appearing to read 'Sally Gepp', written in a cursive style.

Sally Gepp KC
Counsel for Fish & Game