

Memorandum on Completeness and Scope

File	FTAA-2507-1089
Application	Bendigo-Ophir Gold Project
To	[REDACTED]
From	[REDACTED]
Date	5 December 2025
Subject	Assessment whether the application complies with section 46(2) of the Fast-track Approvals Act 2024

Purpose

1. The purpose of this memo is to assist you in making your decision on whether the ‘Bendigo-Ophir Gold Project’ application, received by the Fast-track Team on 31/10/2025 lodged by Matakanui Gold Limited complies with the requirements of section 46(2) of the Fast-track Approvals Act 2024 (**the Act**).

Decision-maker

2. You have delegated authority to make the decision under section 46 of the Act under the instrument of delegation dated 5 February 2025.

Conflict of interest

3. I confirm that I do not have any conflict of interest in this matter that would prevent me making this assessment.

The application

4. For projects listed in Schedule 2 of the Act and referred projects, authorised persons may lodge a substantive application for approvals available under the Act.
5. The Bendigo-Ophir Gold Project is a listed project.
6. The EPA received the substantive application for Bendigo-Ophir Gold Project on 31/10/2025 by Matakanui Gold Limited. The EPA must, in consultation with the relevant administering agencies and

relevant consent authorities, decide whether this substantive application complies with section 46 of the Act by 21 November 2025.

7. As set out in more detail below, the EPA must decide whether the application is complete and either:
 - provide the application to the Panel Convener for consideration and decision by the expert consenting panel (if complete and within scope); or
 - return it to the person who lodged it (if incomplete and not within scope).

Project and scope

8. The Bendigo-Ophir Gold Project, as described in Schedule 2 of the Act is to: “Establish, operate, and remediate an open pit and underground gold mine” and the approximate geographic location is: “Bendigo and Ardgour Stations, approximately 20 kilometres north of Cromwell, Central Otago”
9. The project description as submitted in the application is to “establish and operate an open pit and underground gold mine on Bendigo and Ardgour Stations in Central Otago with project completion and remediation expected in 2065 (depending on further successful exploration and technical studies).”
10. The application for the Bendigo-Ophir Gold Project is within scope of the project description as set out in Schedule 2 of the Act. It clearly outlines the establishment and operation, and remediation of both open pit and underground gold mining methods, consistent with the statutory description. The geographic extent of the Project—covering Bendigo and Ardgour Stations and surrounding areas—is also aligned, with additional detail provided on infrastructure and proximity to conservation land, all of which remains consistent with the statutory scope.

Fast-track consenting application process

Legislative context

11. The EPA must decide whether the substantive application complies with section 46(2) of the Act. A substantive application complies with section 46(2) of the Act, if the application:
 - complies with sections 42, 43 and 44;
 - relates solely to a listed project or a referred project;
 - the EPA considers that, on the face of the application, the project does not appear to involve an ineligible activity; and
 - any fee, charge, or levy payable under the Fast-track Approvals (Cost Recovery) Regulations 2025 (the Regulations) in respect of the application is paid.

Section 42 Requirements

12. Section 42(1) of the Act states that an authorised person may lodge a substantive application for one project or substantive applications for each stage of a project (in the case of a referred project whose referral application was accepted under section 21(1)(a)). This substantive application was

lodged by Matakanui Gold Limited who is the authorised person for the project, as listed in Schedule 2 of the Act.

13. Section 42(4) lists the approvals that may be sought under the Act. The approvals being sought are:
 - a. a resource consent that would otherwise be applied for under the RMA (section 42(4)(a) of the Act)
 - b. five concessions (as defined in clause 1 of Schedule 6 of the Act) (section 42(4)(e) of the Act)
 - c. an amendment to, or revocation of a conservation covenant (as defined in clause 41 of Schedule 6 of the Act) (section 42(4)(g) of the Act)
 - d. a wildlife approval (as defined in clause 1 of Schedule 7 of the Act) (section 42(4)(h) of the Act)
 - e. an approval or a dispensation that would otherwise be applied for under regulation 42 or 43 of the Freshwater Fisheries Regulations 1983 in respect of a complex freshwater fisheries activity (section 42(4)(j) of the Act)
 - f. an archaeological authority described in section 44(a) or (b) of the Heritage New Zealand Pouhere Taonga Act 2014
14. All of the above listed approvals are of the type set out in section 42(4) of the Act.
15. For each of the approvals sought, the applicant is eligible to apply for any corresponding approval under a specified Act.

Section 43 Requirements

16. Section 43 of the Act sets out the requirements for a substantive application. The substantive application was lodged in the form and manner approved by the EPA. Assessment of section 43 requirements is included at **Appendix 1**.

Section 44 Requirements

17. Section 44 of the Act requires that the information provided by the applicant under section 43 must be specified in sufficient detail to satisfy the purpose for which it is required. Assessment of section 44 sufficiency is included at Appendix 1.
18. In assessing the sufficiency of information provided by the applicant, we rely on the information provided to us through consultation with each relevant administering agency and consent authority, as summarised in Appendix 2.

Ineligibility

19. The EPA needs to decide whether it considers that, on the face of the application, the project does not appear to involve an ineligible activity, as defined in section 5 of the Act. As the EPA has to consider this on the face of the application, the EPA is only able to consider information contained in the application materials.
20. The list of ineligible projects includes activities:

- on land returned under a Treaty settlement, on identified Māori Land, on Māori customary land, on land set apart as Māori reservation, or in a customary marine title or protected customary rights area without written permission from the rights holder;
- on Māori customary land, or land set apart as Māori reservation under Part 17 of Te Ture Whenua Māori Act 1993;
- in a customary marine or protected customary rights area without written agreement from the rights holder/group;
- within an aquaculture settlement area without the required authorisation;
- activities that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the RMA (which deal with occupation of space in the common marine and coastal area); or
- that require permissions on national reserves held under the Reserves Act 1977 ; or
- on land listed under clauses 1 to 11 or 14 of Schedule 4 of the Crown Minerals Act 1991 (and clauses 12 and 13 for mining activities).

21. I consider that, on the face of the application, the project does not appear to involve an ineligible activity.

Fees and levies

22. The EPA has received all fees, charges and levies payable by the applicant under the Regulations for the substantive application as follows:

- Application fee in the sum of \$250,000 plus GST;
- Levy in the sum of \$140,000 plus GST

Consultation

23. We have consulted with and considered consultation responses from the following relevant administering agencies and relevant consent authorities:

- with Otago Regional Council (ORC), Central Otago District Council (CODC) and the Ministry for the Environment for an approval described in section 42(4)(a) (resource consent)
- with the Department of Conservation for:
 - i. an approval described in section 42(4)(e) (concession)
 - ii. an approval described in section 42(4)(g) (conservation covenant)
 - iii. an approval described in section 42(4)(h) (Wildlife Act wildlife approval)
- with Heritage New Zealand Pouhere Taonga for an approval described in section 42(4)(i) (archaeological authority);

- with the Department of Conservation for an approval described in section 42(4)(j) (complex freshwater fisheries activity approval);

24. A summary of the consultation is included at **Appendix 2**.

Assessment of compliance for each section of each application form

25. We have assessed the application materials against the relevant checklists in the prescribed application form. Each assessment is contained within the appropriate approval checklist. These are included in Appendix 1 for ease of reference. Please note that the checklists for the concession approvals have been split out into the five concession specific approvals.
26. The application has been assessed against the requirements of section 46 of the Act and determined to meet the minimum statutory criteria for completeness. This means the application is accepted as complete for the purposes of section 46(2), enabling it to proceed to the expert consenting panel for consideration after the assessments under section 47.

Appendix 1: Assessment of section 44 sufficiency

This application seeks the following approval(s) under the Act:

- ☒ A resource consent, change to or cancellation of a resource consent: **checklist A**
- ☒ A concession that would otherwise be applied for under the Conservation Act 1987: **checklist D1**
- ☒ Amendment or revocation of conservation covenant: **checklist D2**
- ☒ A wildlife approval: **checklist E.**
- ☒ An archaeological approval: **checklist F.**
- ☒ Approval of person to carry out an activity under an Archaeological Authority: **checklist F1.**
- ☒ Complex freshwater fisheries approval: **checklist G**
- ☒ Information requirements for all applications **checklist J.**

CHECKLIST A – Resource consent, change to or cancellation of a resource consent

Clause, Schedule 5	Information required for an approval described in section 42(4)(a) (resource consent) and/or section 42(4)(b) (change or cancellation of resource consent), Clauses 5-8 of Schedule 5	Application Reference	EPA assessment, NB – page numbers refer to PDF viewer rather than document
5(1)(a)	A description of the proposed activity	Part A.10, Section 3, page 129-233.	A description has been provided in A.08 - Section 1 - Introduction.pdf , pp. 6 -12 and explained in more detail on construction, operation, maintenance, rehabilitation and closure in A.10 - Section 3 - Project Description.pdf , p.2 onward.
5(1)(b)	<p>A description and map of the site at which the activity is to occur, including whether the site is within or adjacent to—</p> <ul style="list-style-type: none"> (i) a statutory area (as defined in the relevant Treaty settlement Act); or (ii) ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or (iii) a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011 	<p>A map of the site is provided in C.02 BOGP Project Site Layout.</p> <p>A description of the site is provided in Part A.09, Section 2, page 30-128.</p>	Maps of project site is included here: C.01 - BOGP Location Overview.pdf and described throughout A.09 - Section 2 - Existing Environment.pdf . See p.21 for statutory areas - The Project Site is not subject to any statutory acknowledgements within either the RPS or Proposed RPS, with the closest statutory acknowledgements to the site being the Mata-Au (Clutha River) and Te Wairere (Lake Dunstan).

		The site is not within or adjacent to a statutory area, ngā rohe moana o ngā hapū o Ngāti Porou or a protected customary rights area.	
5(1)(c)	<p>Confirmation that the consent application complies with section 46(2)(a), (b), and (d); being:</p> <ul style="list-style-type: none"> • section 42; and • sections 43 and 44; and • relates solely to a listed project or a referred project; and • any fee, charge, or levy payable under regulations in respect of the application is paid. 	Part A.15, Section 8.7.1, page 396-398.	Confirmation has been provided in the A.02A - Legal Overview.pdf , p.16 and A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.12
5(1)(d) and 5(6)	<p>The full name and address of—</p> <p>(i) each owner of the site and of land adjacent to the site; and</p>	Part I.01	Tables set out the key details for properties located wholly or partly with the BOGP Consent Area and those properties located adjacent to the BOGP

	<p>(ii) each occupier of the site and of land adjacent to the site whom the applicant is unable to identify after reasonable inquiry;</p> <p>If the applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership, the applicant must include a statement to that effect (clause 5(6)).</p>		<p>Consent Area, see I.01 - Records of Title and Landowner Table.pdf</p> <p>Also see A.09 - Section 2 - Existing Environment .pdf, p.15</p>
5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates	Part A.10, Section 3, page 129-233.	<p>A.10 - Section 3 - Project Description.pdf, p.9 includes discussion on the early works components of the project that are subject to a separate resource consent process with CODC (2 consents).</p>
5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates	Part A.09, Section 2.2, page 31-36.	<p>A.11 - Section 4 - Approvals Sought .pdf</p> <p>MGL currently holds several approvals for mining and related activities in and around the Project Site, see A.09 - Section 2 - Existing Environment .pdf, pp.2-15. The file lists existing consents and mentions early works applications but does not clearly identify all additional resource consents or confirm</p>

			<p>whether any designations or alterations are required.</p> <p>CODC identified additional consent requirements not addressed in the AEE. Specifically, proposed conditions for operational noise, construction noise, and blasting noise/vibration differ from District Plan rules and therefore require resource consent.</p> <p>They note that any information gaps may be resolved through further information requests.</p> <p>It is noted that the panel are not obliged to accept the proposed conditions as they are presented and could impose their own noise conditions.</p>
5(1)(g)	An assessment of the activity against sections 5, 6 and 7 of the Resource Management Act 1991	Part A.15, Section 8.7.2. page 398-401.	<p>Assessment is included here: A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, pp.14-17</p>

<p>5(1)(h) (and also clauses 5(2) and 5(3))</p>	<p>An assessment of the activity against any relevant provisions in any of the following documents:</p> <ul style="list-style-type: none"> • a national environmental standard: • other regulations made under the Resource Management Act 1991: • a national policy statement: • a New Zealand coastal policy statement: • a regional policy statement or proposed regional policy statement: • a plan or proposed plan: • a planning document recognised by a relevant iwi authority and lodged with a local authority. <p>This assessment must include an assessment of the activity against the requirements set out in clause 5(3) of Schedule 5 being:</p> <ul style="list-style-type: none"> • any relevant objectives, policies or rules in the documents listed; and • any requirement, condition, or permission in any rules in any of those documents; and • any other requirements in any of those documents. 	<p>Part A.15, Section 8.7.3, page 401-496</p>	<p>Assessment is included here:</p> <p>A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, pp.17-112</p> <p>and</p> <p>H.01 - RMA Rules Assessment.pdf</p> <p>H.02 - Full Statutory Provisions Table.pdf</p>
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5(1)(i)	Information about any Treaty settlements that apply in the area covered by the consent application, including— (i) identification of the relevant provisions in those Treaty settlements; and (ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area	Part A.15, Section 8.7.3.17, page 492-493.	A brief summary is provided in A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.108
5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011;	N/A	Not applicable to the application
5(1)(k)	The conditions that the applicant proposes for the resource consent.	Part D	Proposed conditions are included: D.01 - CODC Land Use Consent and Conditions.pdf D.02 - Otago Regional Council Consents and Conditions .pdf D.03 - Schedule One - Central Otago District Council and Otago Regional Council Common Conditions .pdf

			D.04 - Schedule Two - General Conditions for Otago Regional Council Resource Consents .pdf D.05 - Archaeological Authority and Conditions.pdf D.06 - Concession and Conditions for Ardgour Rise.pdf D.07 - Concession and Conditions for SH8 and Ardgour Road Intersection.pdf D.08 - Concession and Conditions for Access Route to CIT Battery.pdf D.09 - Concession and Conditions for Willow Management.pdf D.10 - Concession and Conditions for Monitoring and Access.pdf D.11 - Wildlife Act Authority and Conditions.pdf
5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,— (i) a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and	Part F.14 and F.15	Both letters and a notice under section 30(3)(b) are included and have been received within the last 3 months

	(ii) if a notice has been received under section 30(5), any more up-to-date information that the applicant is aware of about the existing resource consent referred to in the notice.		F.14 - CODC Response Letter - Section 30 of the FTA Act.pdf , dated 10 October 2025 F.15 - ORC Response Letter - Section 30 of the FTA Act.pdf , dated 30 October 2025
5(4)(a)	An assessment of the activity's effects on the environment that includes the information required by clause 6.	Part A.13, Section 6, page 276-364; Part A.14, Section 7, page 265-384; Part A.12, Section 5, page 255-275.	See comments below for clause 6 requirements.
5(4)(b)	An assessment of the activity's effects on the environment that covers the matters specified in clause 7.	Part A.13, Section 6, page 276-364.	See comments below for clause 7 requirements.
6	(1) The assessment of an activity's effects on the environment must include the following information: (a) an assessment of the actual or potential effects on the environment:	Part A.13, Section 6, page 276-364; Part A.14, Section 7, page 265-384; Part A.12,	(a) A.13 - Section 6 - Assessment of Environmental Effects .pdf , pp. 1-87 – effects assessment. A.14 - Section 7 - Management and Monitoring of Actual and Potential Environmental Effects.pdf , pp. 1-20 – management and monitoring

	<ul style="list-style-type: none"> (b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use: (c) if the activity includes the discharge of any contaminant, a description of— <ul style="list-style-type: none"> (i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and (ii) any possible alternative methods of discharge, including discharge into any other receiving environment: (d) a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity: (e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal: (f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision: (g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how 	<p>Section 5, page 255-275.</p>	<p>linked to effects. Including technical reports, mitigation hierarchy, and monitoring plans.</p> <p>(b) A.13 - Section 6 - Assessment of Environmental Effects .pdf, pp. 72-73 – Hazardous substance overview. A.14 - Section 7 - Management and Monitoring of Actual and Potential Environmental Effects.pdf, pp. 16-17 – mitigation and monitoring for haz subs.</p> <p>(c) Nature of discharges (mine-impacted water, dust, gaseous emissions), sensitivity of receiving environments, alternatives. See A.13 - Section 6 - Assessment of Environmental Effects .pdf, pp. 18-30 (surface water and groundwater), pp. 72-76 (air qual) and A.14 - Section 7 - Management and Monitoring of Actual and Potential Environmental Effects.pdf, pp. 10-11</p>
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	<p>the effects will be monitored and by whom, if the activity is approved:</p> <p>(h) an assessment of any effects of the activity on the exercise of a protected customary right.</p>	<p>(surface water quality), pp.16-17 (dust and air qual).</p> <p>(d) Measures including water management, ecological restoration, erosion control, hazardous substances protocols, noise and vibration limits addressed in A.14 - Section 7 - Management and Monitoring of Actual and Potential Environmental Effects.pdf, pp. 3-20 (Table 7-1 summarises mitigation and monitoring for effects that have been identified.</p> <p>(e) consultation summaries with local authorities, iwi, DOC, Heritage NZ, community groups, landowners are recorded here: A.12 - Section 5 - Consultation and Engagement .pdf, pp.1-20, includes a feedback summary/includes concerns raised and applicant's response.</p>
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			<p>It is noted that the documents do record engagement history and reasons for not formalising agreements through the applicant's narrative (pp. 7-10 in A.12) and a summary of cultural concerns and values (pp. 8-9 in A.13).</p> <p>Absence of a final Cultural Impact Assessment (CIA) may mean the application may not fully demonstrate how cultural effects were assessed by mana whenua themselves.</p> <p>It should also be recorded that the EPA have received a number of unsolicited letters from a range of parties considering they are an affected person that have not been processed and assessed yet due to the restrictive timeframes under the Act.</p> <p>(f) as above, A.12 - Section 5 - Consultation and Engagement .pdf, pp. 7-10, documents iwi engagement history.</p>
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			<p>Section 5 (Consultation and Engagement) and Section 6 (Assessment of Environmental Effects) provides a summary of engagement with Kā Rūnaka and reference an unendorsed draft CIA, but the actual CIA report is not appended.</p> <p>(g) Monitoring frameworks for water, biodiversity, noise, dust, heritage, traffic are referenced in A.14 - Section 7 - Management and Monitoring of Actual and Potential Environmental Effects.pdf, pp. 5-20.</p> <p>(h) no dedicated statement saying whether any PCRs apply to the project areas or whether the activities affect their exercise however PCR's are not relevant as the area is a proposed inland mining site. The application should state this explicitly.</p>
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7	<p>The assessment of an activity's effects on the environment must cover the following matters:</p> <ul style="list-style-type: none"> (a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects: (b) any physical effect on the locality, including landscape and visual effects: (c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity: (d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations: (e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants: (f) any unreasonable emission of noise: (g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations. 	<p>Part A.13, Section 6, page 276-364.</p>	<p>(a) see A.13 - Section 6 - Assessment of Environmental Effects .pdf, pp. 3-5 (positive social and economic effects), pp. 8-9 (cultural effects summary) and A.12 - Section 5 - Consultation and Engagement .pdf, pp. 1-20 (community concerns). The cultural assessment is limited, relying primarily on applicant-prepared summaries rather than iwi-authored reports. It should also be noted that the EPA has received unsolicited correspondence from various parties who consider themselves affected persons; these have not yet been processed or assessed due to statutory time constraints under the Act.</p> <p>(b) see A.13 - Section 6 - Assessment of Environmental Effects .pdf, pp. 53-59 (landscape, natural character, visual amenity effects)</p> <p>(c) see A.13 - Section 6 - Assessment of Environmental Effects .pdf, pp. 30-52 for</p>
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			<p>terrestrial ecology and wetlands and A.14 - Section 7 - Management and Monitoring of Actual and Potential Environmental Effects.pdf, pp. 6-9 for mitigation and monitoring for flora, fauna, lizards, invertebrates.</p> <p>(d) A CIA has not been provided but a draft unendorsed CIA has been referenced, see A.13 - Section 6 - Assessment of Environmental Effects .pdf, pp. 77-84 and A.14 - Section 7 - Management and Monitoring of Actual and Potential Environmental Effects.pdf, pp. 17-18 for heritage and archaeology and A.13, pp. 85-86 and A.14, p. 19 for recreation and access. Cultural and spiritual values rely on applicant summary.</p> <p>(e) see, A.13 - Section 6 - Assessment of Environmental Effects .pdf, pp. 18-30 and A.14 - Section 7 - Management and</p>
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			<p>Monitoring of Actual and Potential Environmental Effects.pdf, pp. 10-11</p> <p>(f) there is no assessment of unreasonable noise as the application considers that all noise emissions will be reasonable. For a broad assessment see A.13 - Section 6 - Assessment of Environmental Effects .pdf, pp. 62-64 for noise and vib assessment and A.14 - Section 7 - Management and Monitoring of Actual and Potential Environmental Effects.pdf, pp. 13-14 for information on management plans. NB, CODC has made note that the applicant/application considers all noise emission will be reasonable so there may be missing information if this is found not the case.</p> <p>(g) see A.13 - Section 6 - Assessment of Environmental Effects .pdf, pp. 60-61 for natural hazards and pp. 72-73 for hazardous installations.</p>
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5(5)(a)	If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that activity under section 87A(1) of the Resource Management Act 1991)	Part H, page 1-87.	Permitted activities are part of the proposal and descriptions of compliance measures are provided throughout: H.01 - RMA Rules Assessment.pdf H.02 - Full Statutory Provisions Table.pdf
5(5)(b)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity against any resource management matters set out in that document	N/A	Not applicable to the application
5(5)(c)	If the activity is to occur in an area that is taiāpure-local fishery, a mātaihai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.	N/A	Not applicable to the application

CHECKLIST D1 – Concession – Ardgour Rise

Clause, Schedule 6	Information required for an approval described in section 42(4)(e) (concession), clause 3 of Schedule 6	Application Reference (Name of document, section and page)	EPA assessment, NB – page numbers refer to PDF viewer rather than document
3(1)(a)	A description of the proposed activity	Part A.15, Section 8.8.1, page 497-513.	<p>Refer to A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf (pp. 114-174) for details of activities proposed in the following five concession areas.</p> <p>A concession (easement in favour of CODC as a public right-of-way) for activities occurring on public conservation land within the Ardgour Conservation Area explained further A.10 - Section 3 - Project Description.pdf, p.78</p>
3(1)(b)	A description, maps, and GPS co-ordinates identifying the places where the proposed activity will be carried out (including the classification of those places, the ownership and	Part A.15, Section 8.8.1, page 497-513.	<p>Description is at A.10 - Section 3 - Project Description.pdf, p.78</p> <p>Maps and Coordinates:</p>

	management arrangements, and, if applicable, the name, of the places)		See Figures 8-7 to 8-11 of A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements , pp.502-505 and C.26 - Proposed Ardgour Rise Concession - GPS Coordinates.pdf DOC noted that the location of the additional Chorus fibre cable alignment and its future management is unclear and will require clarification.
3(1)(c)	Information about whether the project could reasonably be undertaken in another location, or in another conservation area or another part of the conservation area, where the potential adverse effects would be significantly less	Part A.15, Section 8.8.1, page 497-513.	Refer to A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p. 121
3(1)(d)	In the case of an application for: <ul style="list-style-type: none"> • a concession that would otherwise be applied for under the Conservation Act 1987, section 14AA of the Wildlife • Act 1953, or section 49 of the National Parks Act 1980; or • a concession as defined in section 2(1) of the Reserves Act 1977 that would otherwise be applied for under section 59A of that Act; 	Part A.15, Section 8.8.1, page 497-513.	(i) Refer to A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf (pp. 129-136) B.39 - Rob Greenaway & Associates - Recreation Assessment (Greenway 2025).pdf

	<p>information about the extent to which the project is consistent with:</p> <ul style="list-style-type: none"> (i) the relevant conservation management strategy and conservation management plan; (ii) any conservation management strategies or conservation management plans that have been co-authored, authored, or approved by a Treaty settlement entity. 		(ii) Not applicable
3(b1)(e)	In the case of an application for a lease, licence, permit, or easement in respect of a reserve other than a Crown-administered reserve, information about the extent to which the project is consistent with any management plan approved under section 41 of the Reserves Act 1977	Part A.15, Section 8.8.1, page 497-513.	Not applicable, the concession relates to public conservation land within the Ardour Conservation Area managed/administered by DOC
3(1)(f)	Information about the extent to which the project is in keeping with the purposes for which the land is held, status, ownership and administration	Part A.15, Section 8.8.1, page 497-513.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.124
3(1)(g)(i)	A description of the potential effects (positive and negative) of the proposed activity	Part A.15, Section 8.8.1, page 497-513.	The applicant has provided high level commentary on the broader effects of the overall proposal and has focused on the concession itself as an effects management strategy. Limited assessment of the effects in

			<p>relation to the concession proposal is provided on p.122 of A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf.</p> <p>DOC also note that an effects assessment for the widening of an existing (low use) easement proposed to transition to a public road would typically cover the effects of vegetation clearance, earthworks, increased traffic volumes on conservation values such as biodiversity, recreation, heritage.</p> <p>For the purposes of completeness, evaluation reflects a borderline level of sufficiency.</p>
3(1)(g)(ii)	A description of any actions that the applicant proposes to take to avoid remedy, mitigate, offset or compensate for any adverse effects of the proposed activity	Part A.15, Section 8.8.1, page 497-513.	<p>See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, pp. 113-129 for descriptions on actions to manage adverse effects. Measures are described at a project level (pp.113–129) but lack concession-specific detail. DOC notes insufficient information on</p>

			<p>mitigation for vegetation clearance, earthworks, and traffic impacts. Wildlife approval for activities on public conservation land has not been sought.</p> <p>For the purposes of completeness, evaluation reflects a borderline level of sufficiency.</p>
3(1)(g)(iii)	A description of details of the type of concession for which the applicant is applying	Part A.15, Section 8.8.1, page 497-513.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.114 and p.126 and D.06 - Concession and Conditions for Ardgour Rise.pdf
3(1)(h)	A statement of the proposed duration of the concession and the reasons for the proposed duration	Part A.15, Section 8.8.1, page 497-513.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.127 and D.06 - Concession and Conditions for Ardgour Rise.pdf , p.1
3(1)(i)	Relevant information relating to the applicant, including any information relevant to their ability to carry out the proposed activity (including whether the applicant or any company director, trustee, partner, or anyone else involved with the	Part A.15, Section 8.8.1, page 497-513.	<p>See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, pp. 6-7</p> <p>Note- DOC has been unable to identify information which assesses</p>

	application has been convicted of any offence or has any current criminal charges pending before a court)		the specific effects and management of those effects related to this concession activity.
3(1)(j)	<p>If applying for a lease, a licence granting an interest in land, or an easement,</p> <ul style="list-style-type: none"> (i) reasons for the request; and (ii) sufficient information to satisfy the panel that, in terms of clause 7 (criteria for assessment of application for concession), it is appropriate under section 81 (decisions on approvals sought in substantive application) to grant the lease, licence, or easement (as the case may be) 	Part A.15, Section 8.8.1, page 497-513.	<p>(i) Addressed, see A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, p. 127</p> <p>(ii) No concession-specific assessment of effects (e.g., vegetation clearance, earthworks, traffic impacts on biodiversity, recreation, heritage).</p> <p>DOC has also been unable to identify information which assesses the specific effects and management of those effects related to this concession activity.</p> <p>For the purposes of completeness, evaluation reflects a borderline level of sufficiency.</p>
3(1)(k)	Full details of any consultation undertaken with relevant iwi and with reserve owners and managers	Part A.15, Section 8.8.1, page 497-513.	The application states that consultation with relevant iwi and reserve owners/managers has been

			<p>undertaken and refers to Section 5 for details (p. 128–129).</p> <p>It lists engagement with:</p> <p>Kā Rūnaka (Te Rūnaka o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnaka o Ōtākou, Hokonui Rūnanga).</p> <p>Department of Conservation (DOC).</p> <p>CODC and NZTA for easement arrangements.</p> <p>Consultation is acknowledged (p.128–129), outcomes, feedback, and responses to concerns are not clearly documented due to the material being summarised by the applicant. DOC notes uncertainty regarding sufficiency of iwi engagement specific to this concession. For the purposes of completeness, evaluation reflects a borderline level of sufficiency.</p>
3(1)(l)	Information about financial and legal liabilities and obligations associated with the land	Part A.15, Section 8.8.1, page 497-513.	The application states A.15 - Section 8 - Fast-Track Approvals Act

			2024 Requirements .pdf , pp. 128–129: Ardgour Rise will be vested to CODC for operation and maintenance after completion. DOC notes lack of evidence of consultation outcomes with CODC or Chorus and absence of detail on financial guarantees or enforcement mechanisms for restoration obligations. For the purposes of completeness, evaluation reflects a borderline level of sufficiency.
3(1)(m)	In the case of an application for a lease, licence, permit, or easement in respect of a reserve other than a Crown-administered reserve, where the reserve is owned or managed by a local authority, confirmation that the local authority has provided written agreement for the activity to be undertaken on the reserve	Part A.15, Section 8.8.1, page 497-513.	Not applicable, the concession relates to public conservation land within the Ardour Conservation Area managed/administered by DOC
3(1)(n)	Confirmation that the applicant has written agreement from the holder of a right of first refusal or right of offer or return to waive that right for the purposes of any lease proposed in the application if—	Part A.15, Section 8.8.1, page 497-513.	Not applicable, the concession relates to public conservation land within the Ardour Conservation Area managed/administered by DOC

	<ul style="list-style-type: none"> (i) the proposed lease would be for a term (including any renewals) that will or is likely to be more than 50 years; and (ii) the granting of the lease would trigger the right of first refusal or right of offer or return. 		
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CHECKLIST D1 – Concession – Come-in-Time

Clause, Schedule 6	Information required for an approval described in section 42(4)(e) (concession), clause 3 of Schedule 6	Application Reference (Name of document, section and page)	EPA assessment, NB – page numbers refer to PDF viewer rather than document
3(1)(a)	A description of the proposed activity	Part A.15, Section 8.8.1, page 497-513.	<p>Refer to A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf (pp. 114-174) for details of activities proposed in the following five concession areas.</p> <p>A concession (permit) for activities occurring on public conservation land within the Bendigo Historic Reserve (Come in Time (CIT) Concession Area).</p> <p>It is noted that DOC hold concerns on sufficiency:</p> <p>There may be ambiguity around the scope of the proposed activity.</p> <p>The reinstatement (at the end of mine life) of the current CIT Battery track linking off the Thomson Gorge Road is referred to in the</p>

			application. DOC was unable to determine if this proposed track reinstatement forms part of the concession proposal as described in A.11 or A.15. Maintenance of the new track over the life of the mine is also not specified as a part of the proposed activity.
3(1)(b)	A description, maps, and GPS co-ordinates identifying the places where the proposed activity will be carried out (including the classification of those places, the ownership and management arrangements, and, if applicable, the name, of the places)	Part A.15, Section 8.8.1, page 497-513.	Description is provided A.10 - Section 3 - Project Description.pdf Maps and Coordinates: See Figures 8-7 to 8-11 of A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements pp.502-505 and C.24 - Proposed Concessions Overview.pdf – C.34.
3(1)(c)	Information about whether the project could reasonably be undertaken in another location, or in another conservation area or another part of the conservation area, where the potential adverse effects would be significantly less	Part A.15, Section 8.8.1, page 497-513.	The application states that the proposed walking route is intended to replace the existing track to the historic Come-in-Time Battery, which will be disrupted by mining operations.

			<p>It notes that the alignment is indicative only and may be refined through ongoing consultation with DOC (A.15, p. 127).</p> <p>However, DOC feedback is that the application does not include an assessment of alternative access routes that could be used during the active mining period. DOC advised during pre-lodgement that other viable alternative access could potentially be provided using existing tracks with significantly less impact on conservation values. This advice does not appear to have been addressed in the application.</p> <p>For the purposes of completeness, evaluation reflects a borderline level of sufficiency.</p>
3(1)(d)	<p>In the case of an application for:</p> <ul style="list-style-type: none"> • a concession that would otherwise be applied for under the Conservation Act 1987, section 14AA of the Wildlife Act 1953, or section 49 of the National Parks Act 1980; or • a concession as defined in section 2(1) of the Reserves Act 1977 that would otherwise be applied for under section 59A of that Act; 	<p>Part A.15, Section 8.8.1, page 497-513.</p>	<p>(i) Refer to A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf (pp. 129-136)</p> <p>B.39 - Rob Greenaway & Associates - Recreation Assessment (Greenway 2025).pdf</p> <p>(ii) Not applicable</p>

	<p>information about the extent to which the project is consistent with:</p> <ul style="list-style-type: none"> (i) the relevant conservation management strategy and conservation management plan; (ii) any conservation management strategies or conservation management plans that have been co-authored, authored, or approved by a Treaty settlement entity. 		
3(1)(e)	In the case of an application for a lease, licence, permit, or easement in respect of a reserve other than a Crown-administered reserve, information about the extent to which the project is consistent with any management plan approved under section 41 of the Reserves Act 1977	Part A.15, Section 8.8.1, page 497-513.	Not applicable, the concession relates to public conservation land within the Ardour Conservation Area managed/administered by DOC
3(1)(f)	Information about the extent to which the project is in keeping with the purposes for which the land is held, status, ownership and administration	Part A.15, Section 8.8.1, page 497-513.	Information provided here: A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.125
3(1)(g)(i)	A description of the potential effects (positive and negative) of the proposed activity	Part A.15, Section 8.8.1, page 497-513.	The applicant has provided high level commentary on the broader effects of the overall proposal and has focused on the concession itself as an effects management strategy and a limited assessment of the effects

			<p>in relation to the concession proposal is provided.</p> <p>See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, p.123. The application provides a basic description of the CIT concession activity (replacement walking route, marker poles, signage, minor vegetation clearance using hand tools, no earthworks anticipated but does not provide a structured assessment of potential effects.</p> <p>The applicant has provided high-level commentary on broader project effects, not concession-specific effects. For the purposes of completeness, evaluation reflects a borderline level of sufficiency.</p>
3(1)(g)(ii)	A description of any actions that the applicant proposes to take to avoid remedy, mitigate, offset or compensate for any adverse effects of the proposed activity	Part A.15, Section 8.8.1, page 497-513.	<p>The application states that incidental vegetation clearance will be undertaken using hand tools only and that no earthworks are anticipated (A.15, p. 126–127).</p> <p>It also notes that the route alignment may be refined through consultation with DOC.</p> <p>There is no clear description of concession-specific mitigation measures beyond these general statements, mention of actions to</p>

			<p>manage potential adverse effects on biodiversity, heritage, or recreation values, reference to weed control, cultural heritage protection, or visitor safety measures, wildlife approval requirements are not addressed.</p> <p>For the purposes of completeness, evaluation reflects a borderline level of sufficiency.</p>
3(1)(g)(iii)	A description of details of the type of concession for which the applicant is applying	Part A.15, Section 8.8.1, page 497-513.	<p>See description A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, p.116 and p.126 and D.08 - Concession and Conditions for Access Route to CIT Battery.pdf</p>
3(1)(h)	A statement of the proposed duration of the concession and the reasons for the proposed duration	Part A.15, Section 8.8.1, page 497-513.	<p>See statement here: A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, p.127 and D.08 - Concession and Conditions for Access Route to CIT Battery.pdf</p>
3(1)(i)	Relevant information relating to the applicant, including any information relevant to their ability to carry out the proposed activity (including whether the applicant or any company director, trustee, partner, or anyone else involved with the	Part A.15, Section 8.8.1, page 497-513.	<p>Relevant information provided here: A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, pp.6-7</p>

	application has been convicted of any offence or has any current criminal charges pending before a court)		DOC has not identified any issues in relation to the applicant's compliance with previous conservation approvals.
3(1)(j)	<p>If applying for a lease, a licence granting an interest in land, or an easement,</p> <ul style="list-style-type: none"> (i) reasons for the request; and (ii) sufficient information to satisfy the panel that, in terms of clause 7 (criteria for assessment of application for concession), it is appropriate under section 81(decisions on approvals sought in substantive application) to grant the lease, licence, or easement (as the case may be) 	Part A.15, Section 8.8.1, page 497-513.	<p>(i) See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, p. 127</p> <p>(ii) No concession-specific assessment of effects (e.g., vegetation clearance, earthworks, traffic impacts on biodiversity, recreation, heritage). For the purposes of completeness, evaluation reflects a borderline level of sufficiency.</p>
3(1)(k)	Full details of any consultation undertaken with relevant iwi and with reserve owners and managers	Part A.15, Section 8.8.1, page 497-513.	<p>The application states that consultation with relevant iwi and reserve owners/managers has been undertaken and refers to Section 5 for details (p. 128–129).</p> <p>It lists engagement with:</p> <p>Kā Rūnaka (Te Rūnaka o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnaka o Ōtākou, Hokonui Rūnanga).</p> <p>Department of Conservation (DOC).</p>

			<p>CODC and NZTA for easement arrangements.</p> <p>Consultation is acknowledged (p.128–129). DOC notes uncertainty regarding sufficiency of iwi engagement specific to this concession.</p> <p>For the purposes of completeness, evaluation reflects a borderline level of sufficiency.</p>
3(1)(l)	Information about financial and legal liabilities and obligations associated with the land	Part A.15, Section 8.8.1, page 497-513.	<p>The application states that for the CIT concession:</p> <p>MGL will maintain the replacement walking route during the mine life.</p> <p>After mine closure, the route will be transferred to DOC for ongoing management (p. 128–129).</p> <p>No ongoing financial or legal obligations beyond this transfer are identified.</p>
3(1)(m)	In the case of an application for a lease, licence, permit, or easement in respect of a reserve other than a Crown-administered reserve, where the reserve is owned or managed by a local authority, confirmation that the local authority has provided written agreement for the activity to be undertaken on the reserve	Part A.15, Section 8.8.1, page 497-513.	<p>Not applicable, the concession relates to public conservation land within the Ardour Conservation Area managed/administered by DOC</p>

3(1)(n)	<p>Confirmation that the applicant has written agreement from the holder of a right of first refusal or right of offer or return to waive that right for the purposes of any lease proposed in the application if—</p> <ul style="list-style-type: none"> (iii) the proposed lease would be for a term (including any renewals) that will or is likely to be more than 50 years; and (iv) the granting of the lease would trigger the right of first refusal or right of offer or return. 	Part A.15, Section 8.8.1, page 497-513.	Not applicable, the concession relates to public conservation land within the Ardour Conservation Area managed/administered by DOC
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CHECKLIST D1 – Concession – State Highway 8

Clause, Schedule 6	Information required for an approval described in section 42(4)(e) (concession), clause 3 of Schedule 6	Application Reference (Name of document, section and page)	EPA assessment, NB – page numbers refer to PDF viewer rather than document
3(1)(a)	A description of the proposed activity	Part A.15, Section 8.8.1, page 497-513.	Refer to A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf (pp. 114-174) for details of activities proposed in the following five concession areas. A concession (easement In favour of NZTA and CODC) for activities occurring on public conservation land within the underlying Ardgour Road / Lindis River and Lower Lindis Conservation Areas.
3(1)(b)	A description, maps, and GPS co-ordinates identifying the places where the proposed activity will be carried out (including the classification of those places, the ownership and management arrangements, and, if applicable, the name, of the places)	Part A.15, Section 8.8.1, page 497-513.	Description is A.10 - Section 3 - Project Description.pdf Maps and Coordinates:

			C.24 - Proposed Concessions Overview.pdf – C.34.
3(1)(c)	Information about whether the project could reasonably be undertaken in another location, or in another conservation area or another part of the conservation area, where the potential adverse effects would be significantly less	Part A.15, Section 8.8.1, page 497-513.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.121
3(1)(d)	<p>In the case of an application for:</p> <ul style="list-style-type: none"> • a concession that would otherwise be applied for under the Conservation Act 1987, section 14AA of the Wildlife Act 1953, or section 49 of the National Parks Act 1980; or • a concession as defined in section 2(1) of the Reserves Act 1977 that would otherwise be applied for under section 59A of that Act; <p>information about the extent to which the project is consistent with:</p> <ul style="list-style-type: none"> (i) the relevant conservation management strategy and conservation management plan; (ii) any conservation management strategies or conservation management plans that have been co-authored, authored, or approved by a Treaty settlement entity. 	Part A.15, Section 8.8.1, page 497-513.	<p>(i) Refer to A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf (pp. 129-136)</p> <p>B.39 - Rob Greenaway & Associates - Recreation Assessment (Greenway 2025).pdf</p> <p>(ii) Not applicable</p>

3(1)(e)	In the case of an application for a lease, licence, permit, or easement in respect of a reserve other than a Crown-administered reserve, information about the extent to which the project is consistent with any management plan approved under section 41 of the Reserves Act 1977	Part A.15, Section 8.8.1, page 497-513.	Not applicable, the concession relates to public conservation land within the Ardour Conservation Area managed/administered by DOC
3(1)(f)	Information about the extent to which the project is in keeping with the purposes for which the land is held, status, ownership and administration	Part A.15, Section 8.8.1, page 497-513.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.124
3(1)(g)(i)	A description of the potential effects (positive and negative) of the proposed activity	Part A.15, Section 8.8.1, page 497-513.	<p>The applicant has provided high level commentary on the broader effects of the overall proposal and has focused on the concession itself as an effects management strategy.</p> <p>No specific assessment of effects in relation to the concession proposal is provided.</p> <p>DOC also note that an effects assessment for the widening of an existing (low use) easement proposed to transition to a public road would typically cover the effects of vegetation clearance, earthworks, increased traffic</p>

			volumes on conservation values such as biodiversity, recreation, heritage.
3(1)(g)(ii)	A description of any actions that the applicant proposes to take to avoid remedy, mitigate, offset or compensate for any adverse effects of the proposed activity	Part A.15, Section 8.8.1, page 497-513.	<p>The applicant has provided high level commentary on the broader effects of the overall proposal and has focused on the concession itself as an effects management strategy.</p> <p>There is no structured description of actions to avoid, remedy, mitigate, offset, or compensate for adverse effects. For the purposes of completeness, evaluation reflects a borderline level of sufficiency.</p>
3(1)(g)(iii)	A description of details of the type of concession for which the applicant is applying	Part A.15, Section 8.8.1, page 497-513.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.115 and 126

3(1)(h)	A statement of the proposed duration of the concession and the reasons for the proposed duration	Part A.15, Section 8.8.1, page 497-513.	Addressed , see A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.127
3(1)(i)	Relevant information relating to the applicant, including any information relevant to their ability to carry out the proposed activity (including whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence or has any current criminal charges pending before a court)	Part A.15, Section 8.8.1, page 497-513.	Addressed , see A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.6-7 DOC has not identified any issues in relation to the applicant's compliance with previous conservation approvals.
3(1)(j)	If applying for a lease, a licence granting an interest in land, or an easement, (i) reasons for the request; and (ii) sufficient information to satisfy the panel that, in terms of clause 7 (criteria for assessment of application for concession), it is appropriate under section 81(decisions on approvals sought in substantive application) to grant the lease, licence, or easement (as the case may be)	Part A.15, Section 8.8.1, page 497-513.	(i) Addressed, see A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p. 127 (ii)) No concession-specific assessment of effects (e.g., vegetation clearance, earthworks, traffic impacts on biodiversity, recreation, heritage).
3(1)(k)	Full details of any consultation undertaken with relevant iwi and with reserve owners and managers	Part A.15, Section 8.8.1, page 497-513.	The application states that consultation with relevant iwi and reserve owners/managers has been

			<p>undertaken and refers to Section 5 for details (p. 128–129).</p> <p>It lists engagement with:</p> <p>Kā Rūnaka (Te Rūnaka o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnaka o Ōtākou, Hokonui Rūnanga).</p> <p>Department of Conservation (DOC).</p> <p>CODC and NZTA for easement arrangements.</p> <p>Consultation is acknowledged (p.128–129), but outcomes, feedback, and responses to concerns are not clearly documented. DOC notes uncertainty regarding sufficiency of iwi engagement specific to this concession.</p>
3(1)(l)	Information about financial and legal liabilities and obligations associated with the land	Part A.15, Section 8.8.1, page 497-513.	<p>Basic arrangements described with limited confirmation of agreements and financial security.</p> <p>The application states:</p>

			<p>For the SH8 concession, MGL seeks an easement in favour of NZTA and CODC for intersection upgrades.</p> <p>Once constructed, the upgraded section of SH8 will be operated and maintained by NZTA as part of the state highway network, and the upgraded section of Ardour Road will be operated and maintained by CODC (p. 128–129).</p> <p>The exact boundary between these areas will be confirmed through consultation with NZTA and CODC during the fast-track process.</p>
3(1)(m)	In the case of an application for a lease, licence, permit, or easement in respect of a reserve other than a Crown-administered reserve, where the reserve is owned or managed by a local authority, confirmation that the local authority has provided written agreement for the activity to be undertaken on the reserve	Part A.15, Section 8.8.1, page 497-513.	Not applicable, the concession relates to public conservation land within the Ardour Conservation Area managed/administered by DOC
3(1)(n)	Confirmation that the applicant has written agreement from the holder of a right of first refusal or right of offer or return to waive	Part A.15, Section 8.8.1, page 497-513.	Not applicable, the concession relates to public conservation land

	<p>that right for the purposes of any lease proposed in the application if—</p> <ul style="list-style-type: none"> (v) the proposed lease would be for a term (including any renewals) that will or is likely to be more than 50 years; and (vi) the granting of the lease would trigger the right of first refusal or right of offer or return. 		<p>within the Ardour Conservation Area managed/administered by DOC</p>
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CHECKLIST D1 – Concession – Water Monitoring

Clause, Schedule 6	Information required for an approval described in section 42(4)(e) (concession), clause 3 of Schedule 6	Application Reference (Name of document, section and page)	EPA assessment, NB – page numbers refer to PDF viewer rather than document
3(1)(a)	A description of the proposed activity	Part A.15, Section 8.8.1, page 497-513.	<p>Refer to A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf (pp. 114-174) for details of activities proposed in the following five concession areas.</p> <p>A concession (permit) for activities occurring on public conservation land within the Bendigo Historic Reserve (Willow Concession Area).</p> <p>It is noted that although the activity is described DOC could not identify specific detail about the equipment proposed or how it will be installed (RS.03) is referenced in document D.10 but there is no application document RS.03 identified.</p>

3(1)(b)	A description, maps, and GPS co-ordinates identifying the places where the proposed activity will be carried out (including the classification of those places, the ownership and management arrangements, and, if applicable, the name, of the places)	Part A.15, Section 8.8.1, page 497-513.	Description is A.10 - Section 3 - Project Description.pdf and A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.118 Maps and Coordinates: C.24 - Proposed Concessions Overview.pdf – C.34.
3(1)(c)	Information about whether the project could reasonably be undertaken in another location, or in another conservation area or another part of the conservation area, where the potential adverse effects would be significantly less	Part A.15, Section 8.8.1, page 497-513.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.123
3(1)(d)	In the case of an application for: <ul style="list-style-type: none"> • a concession that would otherwise be applied for under the Conservation Act 1987, section 14AA of the Wildlife Act 1953, or section 49 of the National Parks Act 1980; or • a concession as defined in section 2(1) of the Reserves Act 1977 that would otherwise be applied for under section 59A of that Act; information about the extent to which the project is consistent with:	Part A.15, Section 8.8.1, page 497-513.	(i) Refer to A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf (pp. 129-136) B.39 - Rob Greenaway & Associates - Recreation Assessment (Greenway 2025).pdf It is noted that DOC was unable to identify where specifically the application assesses the installation or monitoring

	<p>(i) the relevant conservation management strategy and conservation management plan;</p> <p>(ii) any conservation management strategies or conservation management plans that have been co-authored, authored, or approved by a Treaty settlement entity.</p>		<p>equipment/access/associated bore in relation to the CMS.</p> <p>(ii) Not applicable</p>
3(1)(e)	In the case of an application for a lease, licence, permit, or easement in respect of a reserve other than a Crown-administered reserve, information about the extent to which the project is consistent with any management plan approved under section 41 of the Reserves Act 1977	Part A.15, Section 8.8.1, page 497-513.	Not applicable, the concession relates to public conservation land within the Ardour Conservation Area managed/administered by DOC
3(1)(f)	Information about the extent to which the project is in keeping with the purposes for which the land is held, status, ownership and administration	Part A.15, Section 8.8.1, page 497-513.	Although the applicant notes the purpose for which the land is held, limited assessment of the activity is provided against the historic purposes of the reserve.
3(1)(g)(i)	A description of the potential effects (positive and negative) of the proposed activity	Part A.15, Section 8.8.1, page 497-513.	The applicant has provided high level commentary on the broader effects of the overall proposal and has focused on the concession itself as an effects management strategy and a limited assessment of the

			<p>effects in relation to the concession proposal is provided.</p> <p>See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, p.123. The application provides a basic description of the CIT concession activity (replacement walking route, marker poles, signage, minor vegetation clearance using hand tools, no earthworks anticipated but does not provide a structured assessment of potential effects.</p> <p>The applicant has provided high-level commentary on broader project effects, not concession-specific effects.</p>
3(1)(g)(ii)	A description of any actions that the applicant proposes to take to avoid remedy, mitigate, offset or compensate for any adverse effects of the proposed activity	Part A.15, Section 8.8.1, page 497-513.	<p>See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, p. 123.</p> <p>The application provides general commentary on environmental management and compliance</p>

			<p>monitoring but does not include concession-specific mitigation actions for the water monitoring activity.</p> <p>It references broader management plans (e.g., earthworks and erosion control) but does not detail:</p> <p>How installation of the flow meter and bore will avoid or mitigate impacts on riparian vegetation or aquatic habitat.</p> <p>Measures for weed control, cultural heritage protection, or visitor safety.</p> <p>Wildlife approval requirements for works on public conservation land.</p>
3(1)(g)(iii)	A description of details of the type of concession for which the applicant is applying	Part A.15, Section 8.8.1, page 497-513.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.117

3(1)(h)	A statement of the proposed duration of the concession and the reasons for the proposed duration	Part A.15, Section 8.8.1, page 497-513.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.127
3(1)(i)	Relevant information relating to the applicant, including any information relevant to their ability to carry out the proposed activity (including whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence or has any current criminal charges pending before a court)	Part A.15, Section 8.8.1, page 497-513.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.6-7 DOC has not identified any issues in relation to the applicant's compliance with previous conservation approvals.
3(1)(j)	If applying for a lease, a licence granting an interest in land, or an easement, (iii) reasons for the request; and (iv) sufficient information to satisfy the panel that, in terms of clause 7 (criteria for assessment of application for concession), it is appropriate under section 81(decisions on approvals sought in substantive application) to grant the lease, licence, or easement (as the case may be)	Part A.15, Section 8.8.1, page 497-513.	(i)Not applicable , see A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p. 127 – NB A permit is sought; however, a licence or easement may be more appropriate if the applicant wishes this activity to be authorised for a longer term than 10 years. (ii) Not applicable
3(1)(k)	Full details of any consultation undertaken with relevant iwi and with reserve owners and managers	Part A.15, Section 8.8.1, page 497-513.	The application states that consultation with relevant iwi and reserve owners/managers has been

			<p>undertaken and refers to Section 5 for details (p. 128–129).</p> <p>It lists engagement with:</p> <p>Kā Rūnaka (Te Rūnaka o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnaka o Ōtākou, Hokonui Rūnanga).</p> <p>Department of Conservation (DOC).</p> <p>CODC and NZTA for easement arrangements.</p> <p>Consultation is acknowledged (p.128–129), but outcomes, feedback, and responses to concerns are not clearly documented. DOC notes uncertainty regarding sufficiency of iwi engagement specific to this concession. There is no clear summary of iwi positions or DOC’s feedback on ecological, cultural, and heritage impacts within the concession section.</p>
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3(1)(l)	Information about financial and legal liabilities and obligations associated with the land	Part A.15, Section 8.8.1, page 497-513.	<p>The application states:</p> <p>For the Water Monitoring Concession, MGL will install and maintain the flow meter and groundwater bore during the mine life.</p> <p>These structures will be disestablished upon mine closure, with no ongoing obligations identified beyond removal.</p> <p>See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, pp. 128–129.</p> <p>While the application outlines basic responsibilities, it does not confirm DOC’s agreement to these arrangements.</p> <p>There is no detail on financial provisions or guarantees to ensure removal and site restoration.</p> <p>The application does not address liability for environmental or</p>
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			<p>cultural impacts during the concession term.</p> <p>Wildlife approval requirements for activities on public conservation land remain unaddressed.</p>
3(1)(m)	<p>In the case of an application for a lease, licence, permit, or easement in respect of a reserve other than a Crown-administered reserve, where the reserve is owned or managed by a local authority, confirmation that the local authority has provided written agreement for the activity to be undertaken on the reserve</p>	Part A.15, Section 8.8.1, page 497-513.	<p>Not applicable, the concession relates to public conservation land within the Ardour Conservation Area managed/administered by DOC</p>
3(1)(n)	<p>Confirmation that the applicant has written agreement from the holder of a right of first refusal or right of offer or return to waive that right for the purposes of any lease proposed in the application if—</p> <p>(vii) the proposed lease would be for a term (including any renewals) that will or is likely to be more than 50 years; and</p> <p>(viii) the granting of the lease would trigger the right of first refusal or right of offer or return.</p>	Part A.15, Section 8.8.1, page 497-513.	<p>Not applicable, the concession relates to public conservation land within the Ardour Conservation Area managed/administered by DOC</p>

CHECKLIST D1 – Concession – Willows Management

Clause, Schedule 6	Information required for an approval described in section 42(4)(e) (concession), clause 3 of Schedule 6	Application Reference (Name of document, section and page)	EPA assessment, NB – page numbers refer to PDF viewer rather than document
3(1)(a)	A description of the proposed activity	Part A.15, Section 8.8.1, page 497-513.	Refer to A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf (pp. 114-174) for details of activities proposed in the following. A concession (permit) for activities occurring on public conservation land within the Bendigo Historic Reserve (Water Monitoring Concession Area).
3(1)(b)	A description, maps, and GPS co-ordinates identifying the places where the proposed activity will be carried out (including the classification of those places, the ownership and management arrangements, and, if applicable, the name, of the places)	Part A.15, Section 8.8.1, page 497-513.	Description is A.10 - Section 3 - Project Description.pdf and A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.116 Maps and Coordinates: C.24 - Proposed Concessions Overview.pdf – C.34.

3(1)(c)	Information about whether the project could reasonably be undertaken in another location, or in another conservation area or another part of the conservation area, where the potential adverse effects would be significantly less	Part A.15, Section 8.8.1, page 497-513.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.123
3(1)(d)	<p>In the case of an application for:</p> <ul style="list-style-type: none"> • a concession that would otherwise be applied for under the Conservation Act 1987, section 14AA of the Wildlife Act 1953, or section 49 of the National Parks Act 1980; or • a concession as defined in section 2(1) of the Reserves Act 1977 that would otherwise be applied for under section 59A of that Act; <p>information about the extent to which the project is consistent with:</p> <ul style="list-style-type: none"> (i) the relevant conservation management strategy and conservation management plan; (ii) any conservation management strategies or conservation management plans that have been co-authored, authored, or approved by a Treaty settlement entity. 	Part A.15, Section 8.8.1, page 497-513.	<p>(i) Refer to A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf</p> <p>B.39 - Rob Greenaway & Associates - Recreation Assessment (Greenway 2025).pdf</p> <p>(ii) The application (A.15 – Section 8 – Fast-Track Approvals Act 2024 Requirements, pp. 129–130) provides a general assessment of how willow management aligns with conservation objectives. It notes that the activity will restore riparian margins and improve ecological values through the removal of crack willow and replacement planting with native species.</p>

			<p>No explicit reference to CMS objectives or policies for pest plant control and riparian restoration.</p> <p>Limited analysis of how the activity aligns with the historic and recreational values of the Bendigo Historic Reserve and mention of Treaty settlement-related conservation plans.</p>
3(1)(e)	In the case of an application for a lease, licence, permit, or easement in respect of a reserve other than a Crown-administered reserve, information about the extent to which the project is consistent with any management plan approved under section 41 of the Reserves Act 1977	Part A.15, Section 8.8.1, page 497-513.	Not applicable, the concession relates to public conservation land within the Ardour Conservation Area managed/administered by DOC.
3(1)(f)	Information about the extent to which the project is in keeping with the purposes for which the land is held, status, ownership and administration	Part A.15, Section 8.8.1, page 497-513.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf p.125
3(1)(g)(i)	A description of the potential effects (positive and negative) of the proposed activity	Part A.15, Section 8.8.1, page 497-513.	The Willow Concession Area is described as enabling crack willow management along Bendigo and Clearwater Creeks, with positive ecological and amenity effects.

			<p>It is framed as part of offsetting and compensation measures for residual ecological effects of the overall mining project.</p> <p>The applicant provided high-level commentary on broader project effects, not a specific effects assessment for the concession.</p> <p>Missing consideration of:</p> <p>Heritage impacts (historic reserve context).</p> <p>Recreation impacts (public access and amenity).</p> <p>Wildlife impacts (including taonga species).</p> <p>Biodiversity impacts (riparian habitat and native species).</p> <p>DOC Position: No detailed analysis of these aspects was identified.</p>
3(1)(g)(ii)	A description of any actions that the applicant proposes to take to avoid remedy, mitigate, offset or compensate for any adverse effects of the proposed activity	Part A.15, Section 8.8.1, page 497-513.	The applicant notes that willow management is part of broader offsetting and compensation

			<p>measures for ecological effects of the Bendigo-Ophir Gold Project.</p> <p>References to the Landscape and Ecological Rehabilitation Management Plan (LERMP) and Ardgour Restoration Management Plan.</p> <p>Refer to A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, pp.116-117. The applicant states that a plan and proposed methodology for willow management will be certified by DOC prior to removal.</p> <p>DOC have raised that there is not a concession-specific mitigation detail provided in the application.</p> <p>DOC notes that a wildlife approval has not been sought for any mitigation activities on Public Conservation Land (PCL).</p> <p>Limited detail on herbicide application controls, sediment</p>
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			<p>management, or timing to avoid bird nesting.</p> <p>Limited description of actions to protect historic features or maintain public access during works.</p> <p>No confirmation of wildlife approval for mitigation activities on PCL.</p> <p>Certification is mentioned, but limited supporting information (by a clear methodology or draft plan in the application).</p>
3(1)(g)(iii)	A description of details of the type of concession for which the applicant is applying	Part A.15, Section 8.8.1, page 497-513.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.116, 117, 126
3(1)(h)	A statement of the proposed duration of the concession and the reasons for the proposed duration	Part A.15, Section 8.8.1, page 497-513.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.127 and D.09 - Concession and Conditions for Willow Management.pdf

3(1)(i)	Relevant information relating to the applicant, including any information relevant to their ability to carry out the proposed activity (including whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence or has any current criminal charges pending before a court)	Part A.15, Section 8.8.1, page 497-513.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.6-7 DOC has not identified any issues in relation to the applicant's compliance with previous conservation approvals.
3(1)(j)	If applying for a lease, a licence granting an interest in land, or an easement, (i) reasons for the request; and (ii) sufficient information to satisfy the panel that, in terms of clause 7 (criteria for assessment of application for concession), it is appropriate under section 81(decisions on approvals sought in substantive application) to grant the lease, licence, or easement (as the case may be)	Part A.15, Section 8.8.1, page 497-513.	Not applicable (i) Not applicable , A permit is sought (ii) Not applicable
3(1)(k)	Full details of any consultation undertaken with relevant iwi and with reserve owners and managers	Part A.15, Section 8.8.1, page 497-513.	The application states that consultation with relevant iwi and reserve owners/managers has been undertaken and refers to Section 5 for details (p. 128–129). It lists engagement with:

			<p>Kā Rūnaka (Te Rūnaka o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnaka o Ōtākou, Hokonui Rūnanga).</p> <p>Department of Conservation (DOC).</p> <p>CODC and NZTA for easement arrangements.</p> <p>While consultation is acknowledged, the application does not provide substantive detail on outcomes, feedback, or how concerns have been addressed for concession-specific activities.</p> <p>There is no clear summary of iwi positions or DOC's feedback on ecological, cultural, and heritage impacts within the concession section.</p>
3(1)(l)	Information about financial and legal liabilities and obligations associated with the land	Part A.15, Section 8.8.1, page 497-513.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , pp.128-129

3(1)(m)	In the case of an application for a lease, licence, permit, or easement in respect of a reserve other than a Crown-administered reserve, where the reserve is owned or managed by a local authority, confirmation that the local authority has provided written agreement for the activity to be undertaken on the reserve	Part A.15, Section 8.8.1, page 497-513.	Not applicable, the concession relates to public conservation land within the Ardour Conservation Area managed/administered by DOC
3(1)(n)	Confirmation that the applicant has written agreement from the holder of a right of first refusal or right of offer or return to waive that right for the purposes of any lease proposed in the application if— <ul style="list-style-type: none"> (ix) the proposed lease would be for a term (including any renewals) that will or is likely to be more than 50 years; and (x) the granting of the lease would trigger the right of first refusal or right of offer or return. 	Part A.15, Section 8.8.1, page 497-513.	Not applicable, the concession relates to public conservation land within the Ardour Conservation Area managed/administered by DOC

CHECKLIST D2 – Amendment ~~or revocation~~ of conservation covenant

Clause, Schedule 6	Information required for an approval described in section 42(4)(g) (conservation covenant), clause 42 of Schedule 6	Application Reference	EPA assessment, NB – page numbers refer to PDF viewer rather than document
42(a)	A general assessment of the values protected by the covenant (informed by the covenant purpose and objectives), including the extent of any values of regional, national or international significance	Part A.15, Section 8.9.1, page 520-540.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , pp. 139-144 Noting that information provided is a general assessment and lacks consideration of the values informed by the covenant objectives. DOC has identified gaps in the heritage, recreation, landscape and biodiversity considerations.
42(b)	If the application relates only to a portion of the area protected by a conservation covenant, a description of the area affected, and the values contained within it	Part A.15, Section 8.9.1, page 520-540.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , pp. 144-148 The application meets the basic requirement by describing the

			<p>affected area and listing values, but lacks detailed analysis of:</p> <p>The extent and significance of those values within the uplift area.</p> <p>Impacts on covenant objectives and public access provisions.</p>
42(c)	An assessment of impacts of the project on those values and any proposed methods of addressing those impacts	Part A.15, Section 8.9.1, page 520-540.	<p>See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, from page 139/</p> <p>The application seeks to uplift part of the Bendigo Conservation Covenant to enable mining activities (RAS, CIT, SRX, SRE pits, haul roads, Western ELF).</p> <p>Figure 8-13 shows the Bendigo Conservation Covenant Uplift Area.</p> <p>Mentions natural character and landscape values (Dunstan Mountains ONL), ecological values (native flora/fauna), historic values (mining heritage), and public access values (Thomsons Gorge Road, Rise and Shine Creek).</p>

			<p>It is noted that DOC has commented that the application does not adequately describe the values that will remain protected after the amendment.</p> <p>Impacts on values are addressed broadly, but heritage, recreation, landscape, and biodiversity assessments have gaps, meaning impacts may not be fully identified.</p> <p>Includes recording sites that would be lost, creating new public access to the Come-in-Time Battery (via separate concession), and restoration work on the battery (requires separate approvals not sought in this process).</p>
42(d)	Whether and to what extent the values impacted by the project are found elsewhere in any part of the covenanted area that will remain subject to the covenant protection	Part A.15, Section 8.9.1, page 520-540.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p. 154

			Noting the assessment of values in the area which will remain covenanted is also limited.
42(e)	Contact details of the owner of the burdened land or, if the covenant relates to more than 1 parcel of land, of the owner of each piece of land that will be directly affected by the proposed activity	Part A.15, Section 8.9.1, page 520-540.	See F.02 - Bendigo Station Access Agreement (REDACTED) - December 2017.pdf Noting postal contacts only have been identified.
42(f)	The written consent to the proposed amendment or revocation of each person referred to in paragraph (e)	Part A.15, Section 8.9.1, page 520-540.	See F.05 - Bendigo Station - Signed Affected Persons Approval.pdf , pp. 1-2
42(g)	If the covenant was granted in favour of a local authority or other body under section 77 of the Reserves Act 1977, the written consent of that local authority or other body	Part A.15, Section 8.9.1, page 520-540.	Not applicable to the application - Covenant is in favour of Minister of Conservation therefore no requirement for other approval.
42(h)	Details of the covenant, including: (i) the addresses of all land subject to the covenant: (ii) a copy of the covenant deed and any variations.	Part A.15, Section 8.9.1, page 520-540.	See F.02 - Bendigo Station Access Agreement (REDACTED) - December 2017.pdf , p.2

CHECKLIST E – Wildlife approval

Clause, Schedule 7	Information required for an approval described in section 42(4)(h) (Wildlife Act approval), clause 2 of Schedule 7	Application Reference	EPA assessment, NB – page numbers refer to PDF viewer rather than document
2(1)(a)	Specify the purpose of the proposed activity	Part A.15, Section 8.10.1, page 540-552..	For both Lizards and Avifauna approvals, see: A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p. 157
2(1)(b)	Identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land)	Part A.15, Section 8.10.1, page 540-552..	For or both Lizards and Avifauna approvals, see: A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , pp. 156-157
2(1)(c)	An assessment of the activity and its impacts against the purpose of the Wildlife Act	Part A.15, Section 8.10.1, page 540-552..	See:

			A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p. 158
2(1)(d)	List protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted	Part A.15, Section 8.10.1, page 540-552..	<p>For both Lizards and Avifauna approvals, see:</p> <p>A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, pp. 161-165</p> <p>And Management Plans: G.04 - Avifauna Management Plan.pdf and G.05 - Lizard Management Plan.pdf</p> <p>Note – DOC agree that information is present but have made a note that it appears misidentification of species may have taken place (McCann's skink – Tussock Skink)</p>
2(1)(e)	An outline of impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System)	Part A.15, Section 8.10.1, page 540-552..	<p>For both Lizards and Avifauna approvals, see:</p> <p>A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, pp. 161-165</p>

2(1)(f)	A statement of how the methods proposed to be used to conduct the actions involving protected wildlife will ensure that best practice standards are met	Part A.15, Section 8.10.1, page 540-552.	<p>For both Lizards and Avifauna approvals, see:</p> <p>A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, pp. 165-166</p> <p>DOC notes the statements are provided but that there may be inconsistencies identified between the G.05 - Lizard Management Plan.pdf and methods proposed in D.11 - Wildlife Act Authority and Conditions.pdf.</p>
2(1)(g)	A description of the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	Part A.15, Section 8.10.1, page 540-552..	<p>For both Lizards and not applicable for the Avifauna approvals, see:</p> <p>A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, p.166</p>

2(1)(h)	A statement of the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available)	Part A.15, Section 8.10.1, page 540-552..	<p>It is unclear whether the approval spans across the entire BOGP site (including PCL) as referenced in some documents but not others, and whether the approvals are intended to apply to activities affecting protected wildlife undertaken on PCL. See:</p> <p>A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, p.166</p> <p>A.11 - Section 4 - Approvals Sought .pdf, p.16</p> <p>D.11 - Wildlife Act Authority and Conditions.pdf, p.13</p> <p>G.05 - Lizard Management Plan.pdf, p.14 and p.18</p> <p>G.08 - Ardgour Restoration Area Management Plan.pdf, p.14</p> <p>For the purposes of completeness, evaluation reflects a borderline level of sufficiency.</p>
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2(1)(i)	A statement of whether authorisation is sought to temporarily hold or relocate wildlife	Part A.15, Section 8.10.1, page 540-552..	For both Lizards and not applicable for the Avifauna approvals, see: D.11 - Wildlife Act Authority and Conditions.pdf , p.1 G.05 - Lizard Management Plan.pdf , pp. 10-14 G.04 - Avifauna Management Plan.pdf , p.15
2(1)(j)	A list of all actual and potential wildlife effects (adverse or positive) of the proposed activity, including effects on the target species, other indigenous species, and the ecosystems at the site	Part A.15, Section 8.10.1, page 540-552..	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , pp. 166-167 G.05 - Lizard Management Plan.pdf , p.9 G.04 - Avifauna Management Plan.pdf , p. 10 A.13 - Section 6 - Assessment of Environmental Effects .pdf , pp. 31-53

			<p>A.14 - Section 7 - Management and Monitoring of Actual and Potential Environmental Effects.pdf, pp. 6-9</p> <p>G.05 - Lizard Management Plan.pdf, p.14</p> <p>G.04 - Avifauna Management Plan.pdf, p. 11</p> <p>Potentially not all effects have been identified; they have been provided at a high-level and there are may be gaps around the scale of effects. For the purposes of completeness, evaluation reflects a borderline level of sufficiency.</p>
2(1)(k)	Where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife)	Part A.15, Section 8.10.1, page 540-552..	<p>For both Lizards and Avifauna approvals, see:</p> <p>A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, p. 167</p> <p>A.13 - Section 6 - Assessment of Environmental Effects .pdf, pp. 6-7</p>

			<p>A.14 - Section 7 - Management and Monitoring of Actual and Potential Environmental Effects.pdf, pp. 6-9</p> <p>DOC notes that the information is present however as only a limited range of effects have been recognised in the application subsequently the methods proposed to avoid or minimise these effects are also limited. But methods have been outlined.</p>
2(1)(l)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence under the Wildlife Act	Part A.15, Section 8.10.1, page 540-552..	<p>See:</p> <p>A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, p. 167</p> <p>DOC has not identified any offences relating to the applicant under the Wildlife Act 1953.</p>
2(1)(m)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has any current criminal charges under the Wildlife Act pending before a court	Part A.15, Section 8.10.1, page 540-552..	<p>See:</p> <p>A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, p. 167</p>

			DOC has not identified any offences relating to the applicant under the Wildlife Act 1953.
2(1)(n)	Provision of proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts	Part A.15, Section 8.10.1, page 540-552.	<p>Consultation records are provided within: A.12 - Section 5 - Consultation and Engagement .pdf, p.8 states that "Korero with the komiti included provision of all preliminary technical reports for review and discussions around the consent application and the Fast Track Approval process. A shared platform was created to enable easy access to relevant technical documents, and communication remains active and collaborative. "</p> <p>I have since confirmed with applicant (on 21 November 2025) that MGL has provided the following technical reports and management plans:</p> <p>Lizard Values Assessment (RMA)</p> <p>Lizard Management Plan (Alliance Ecology)</p>

			<p>Native Bat Survey (Habitat NZ)</p> <p>Mammalian Pest Management Plan (Habitat NZ)</p> <p>Terrestrial Invertebrate Management Plan (Habitat NZ)</p> <p>Terrestrial Invertebrate Survey (Habitat NZ)</p> <p>Avifauna Values Assessment (RMA)</p> <p>Avifauna Management Plan (Alliance Ecology)</p> <p>Vegetation Values Assessment (RMA)</p> <p>Assessment of Ecological Effects: Terrestrial Ecology (Alliance Ecology)</p> <p>DOC has noted that the wildlife approval section does not clearly document consultation details specific to wildlife matters. There is no clear evidence of targeted</p>
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			<p>engagement on taonga species, associated ecosystems, or the mitigation measures proposed to address potential impacts. Furthermore, DOC observed that its request for dedicated workshops was not followed through, which indicates that the depth of engagement was limited. Despite these shortcomings, the applicant has provided confirmation of consultation activities and supporting documentation, and on that basis, the clause requirements are considered to be technically met.</p>
2(1)(o)	Provision of any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal	Part A.15, Section 8.10.1, page 540-552..	<p>See: A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, p. 168</p> <p>The applicant has commissioned several expert reports to assess the effects of the Project and to set out measures to manage the effects on wildlife, all of which are appended to this application in Parts B and G</p>

CHECKLIST F – Archaeological authority

Clause, Schedule 8	Information required for an approval described in section 43(3)(i) Archaeological Authority	Application Reference	EPA assessment, NB – page numbers refer to PDF viewer rather than document
2(1)(a)	a legal description of the land or, if one is not available, a description that is sufficient to identify the land to which the application relates	Part A.15, Section 8.11.1, page 553-555.	Legal descriptions and landowner information is available in [REDACTED] [REDACTED] [REDACTED] Map of project site is included here: C.01 - BOGP Location Overview.pdf and described throughout A.09 - Section 2 - Existing Environment .pdf . A map showing the location of the Arch sites within the project area is included on of A.09 - Section 2 - Existing Environment .pdf p.89
2(1)(b)	the name of the owner of the relevant land, if the applicant is not the owner of the land	Part A.15, Section 8.11.1, page 553-555.	Legal descriptions and landowner information is available in [REDACTED] [REDACTED] [REDACTED]

2(1)(c)	proof of consent, if the owner of the relevant land has consented to the proposed activity	Part A.15, Section 8.11.1, page 553-555.	Consent from two landowners is provided in F.03 and F.05 , and includes their consent to the application for an Archaeological Authority. More info is provided in A.15 p.169
2(1)(d)	confirmation that the application complies with section 42 , 43, and 44 of the Act	Part A.15, Section 8.11.1, page 553-555.	Confirmation has been provided in the A.02A - Legal Overview.pdf . p.16
	confirmation that the application relates solely to a listed project or a referred project	Part A.15, Section 8.11.1, page 553-555.	Confirmation has been provided in the A.02A - Legal Overview.pdf . p.16
	any fee, charge, or levy payable under regulations in respect of the application is paid.	Part A.15, Section 8.11.1, page 553-555.	Confirmation has been provided in the A.02A - Legal Overview.pdf . p.16
2(1)(e)	a description of each archaeological site to which the application relates and the location of each site	Part A.15, Section 8.11.1, page 553-555.	Tables describing each site, the heritage value, and the type of site it is, and mapping of the locations, are included in A.09 - Section 2 - Existing Environment .pdf p.86-92

2(1)(f)	a description of the activity for which the authority is sought	Part A.15, Section 8.11.1, page 553-555.	<p>A brief description regarding the modification of Arch sites is provided in A.15 p.170.</p> <p>Detail about the project activities is provided in A.10 p.5-7</p> <p>Info on activities specific to Arch sites is provided in A.11 p.19</p>
2(1)(g)	a description of how the proposed activity will modify or destroy each archaeological site	Part A.15, Section 8.11.1, page 553-555.	<p>A table outlining the severity of impacts on archaeological sites and associated details is provided in B.34 – Part 1 (p.174), with further information on p.176. While sites G41/259, G41/310, and G41/587 were initially identified as being within the project area (see A.09, pp.86–92), the application documents and archaeological assessment did not clearly address whether these sites would be modified or destroyed. Heritage New Zealand Pouhere Taonga (HNZPT) also raised this issue in its feedback, noting that “three recorded archaeological sites are</p>

			<p>identified within the application boundary but the effects on these have not been considered in the archaeological assessment.”</p> <p>Subsequent review of supporting documents, including the Archaeological and Heritage Management Plan (G.22, p.4), suggested that some of these sites may lie close to, but not within, the disturbance footprint. To resolve this uncertainty, additional confirmation was sought from the applicant. The applicant has confirmed that sites G41/259, G41/310, and G41/587 are located outside the disturbance footprint of the project. This clarification addresses the ambiguity identified in earlier documentation and ensures that these sites will not be subject to modification or destruction under the proposed works.</p>
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2(1)(h)	<p>except in the case of an approval described in section 44(b) of the HNZPT Act, an assessment of—</p> <ul style="list-style-type: none"> (i) the archaeological, Māori, and other relevant values of the archaeological site in the detail that is appropriate to the scale and significance of the proposed activity and the proposed modification or destruction of the archaeological site; and (ii) the effect of the proposed activity on those values 	<p>Part A.15, Section 8.11.1, page 553-555.</p>	<p>The clause requires an assessment of archaeological, Māori, and other relevant values for each site, proportionate to the scale and significance of the proposed modification or destruction. While the application includes an assessment, it is presented at a general level and does not fully meet the level of detail anticipated by the clause. Heritage New Zealand Pouhere Taonga (HNZPT) has commented that the assessment of archaeological values is not provided in sufficient detail to reflect the significance of the proposed activity and its potential effects on these sites (Schedule 8, clause 2(1)(h)(i)). Despite these limitations, the information supplied satisfies the minimum requirements of the clause and is therefore considered complete, although the depth and</p>
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			robustness of the assessment remain a concern.
2(1)(i)	<p>a statement as to whether consultation with tangata whenua, the owner of the relevant land (if the applicant is not the owner), or any other person likely to be affected—</p> <ul style="list-style-type: none"> (i) has taken place, with details of the consultation, including the names of the parties and the tenor of the views expressed; or (ii) has not taken place or been completed, with the reasons why consultation has not occurred or been completed (as applicable). 	Part A.15, Section 8.11.1, page 553-555.	A statement detailing the consultation with tangata whenua and relevant landowners is provided in A.15 p.171,
	Additional information applicants may include in their application for an approval described in section 43(3)(i) Archaeological Authority	Application Reference	
	Have any archaeological authorities been granted for this location in the past?	Part A.15, Section 8.11.1, page 553-555.	<p>Not discretionary.</p> <p>There is detailed discussion of archaeological values and the need for an archaeological authority under the HNZPT Act, but no evidence of prior approvals for</p>

			archaeological work at the Project Site.
	Identification of the relevant planning overlays, i.e. are there any relevant Heritage or QEII covenants or Heritage Orders, District Plan schedules, New Zealand Heritage list/Rārangī Kōrero entries?	Part A.15, Section 8.11.1, page 553-555.	<p>Not discretionary.</p> <p>The application identifies the Bendigo Conservation Covenant and ONL overlays but does not clearly state:</p> <p>Whether any QEII covenants apply.</p> <p>Whether the Bendigo Historic Reserve or Quartz Reef Historic Area are formally listed on the NZ Heritage List/Rārangī Kōrero.</p> <p>Whether any Heritage Orders exist.</p>

CHECKLIST F1 – Archaeological authority: Approval for person to carry out activity

Clause 7(5), Schedule 8	Information required for an approval described in clauses 7(1) and (2)(b) (approval of person to carry out activity)	Application Reference	EPA assessment, NB – page numbers refer to PDF viewer rather than document
(a)	Evidence that the person carrying out the activity under an authority has sufficient skill and competency, is fully capable of ensuring that the proposed activity is carried out to the satisfaction of Heritage New Zealand Pouhere Taonga, and has access to appropriate institutional and professional support and resources	G.22 Archaeological and Heritage Management Plan, page 1-7. A.02 Legal Overview, Appendix 5	Dr Naomi Woods is identified as the s45 approved person (G.22, p.1/2), approved by HNZPT. Responsibilities and authority to direct works are outlined (G.22, pp.2-4). Institutional support and resources (NZ Heritage Properties, HNZPT, Aukaha) are listed (G.22, p.7). Professional competency confirmed via Code of Conduct compliance (A.02, Appendix 5, pp.102).
(b)(i)	In the case of a site of interest to Māori, evidence that the person carrying out the activity under an authority has the requisite competencies for recognising and respecting Māori values	G.22 Archaeological and Heritage Management Plan, page 1-7.	The Archaeological and Heritage Management Plan confirms engagement with Aukaha and tangata whenua (G.22, pp.2-4, 8 - Appendix A), Dr Naomi Woods, the s45 approved person, is responsible

		A.02 Legal Overview, Appendix 5	for cultural protocols, including stopping work and notifying Aukaha if koiwi tangata are found. Procedures for karakia and tikanga Māori are detailed (G.22, P.8.). Institutional support from Aukaha and HNZPT is documented.
(b)(ii)	In the case of a site of interest to Māori, evidence that the person carrying out the activity under an authority has access to appropriate cultural support	G.22 Archaeological and Heritage Management Plan, page 1-7. A.02 Legal Overview, Appendix 5	The Archaeological and Heritage Management Plan confirms support through Aukaha and tangata whenua engagement (G.22, pp. 7-8). Contact details for Aukaha are provided, and protocols for koiwi tangata and tikanga Māori are outlined, ensuring access to appropriate cultural expertise.

CHECKLIST G – Complex freshwater fisheries approval

Clause, Schedule 9	Information required for an approval described in section 42(4)(j) (complex freshwater fisheries approval), clause 3 of Schedule 9	Application Reference	EPA assessment, NB – page numbers refer to PDF viewer rather than document
3(a)	<p>in relation to the structure and any fish facility:</p> <ul style="list-style-type: none"> (i) a description of the type of structure or fish facility: (ii) the dimensions of the structure or fish facility: (iii) the design of the structure or fish facility: (iv) the placement of the structure or fish facility: (v) the water flows: (vi) the operating regime 	Part A.15, Section 8.12.1, page 555-557.	<p>(i) Type</p> <p>Information on stream diversions is included, with purpose and general design principles outlined. For culverts, the application confirms these will form part of the project but provides only high-level commentary, noting that detailed specifications will be developed during the design phase.</p> <p>(ii) Dimensions</p> <p>Indicative dimensions for stream diversions are provided, supported by design principles. Culvert dimensions are not yet finalised; the application states these will be determined at detailed design stage.</p>

			<p>(iii) Design</p> <p>Diversion design principles are described, including approach to alignment and flow management. Culvert design details are deferred to later stages, with the application indicating compliance with relevant standards will be ensured during implementation.</p> <p>(iv) Placement</p> <p>General placement of diversions within the project footprint is addressed. Culvert locations are identified conceptually, with confirmation that exact positioning will be resolved through detailed engineering design.</p> <p>(v) Water flows</p> <p>Baseline and indicative flow information is provided for affected watercourses. DOC has noted concerns regarding the sufficiency of this information, as the level of detail may limit the ability to fully</p>
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			<p>assess ecological impacts and fish passage.</p> <p>(vi) Operating Regime</p> <p>The operating regime for water management structures is described in A.15 (p.172), including principles for flow control and monitoring.</p>
3(b)	the freshwater species and values present (with particular focus on threatened, data-deficient, and at-risk species as defined in the New Zealand Threat Classification System)	Part A.15, Section 8.12.1, page 555-557.	The application identifies species presence and absence as referenced.
3(c)	the water quality and quantity in the surrounding habitat (at the proposed structure location, upstream and downstream)	Part A.15, Section 8.12.1, page 555-557.	Baseline water quality and quantity information is provided in several sections in A.15, including discussion of degraded conditions in Shepherds, Rise and Shine, and Bendigo Creeks, and proposed mitigation measures such as water treatment systems and flow augmentation

3(d)	how the passage of fish will be provided for or impeded	Part A.15, Section 8.12.1, page 555-557.	<p>The application states that no fish species were detected within the project site watercourses, and natural barriers already prevent upstream fish passage.</p> <p>It notes that culverts proposed as part of the project are not intended to facilitate fish passage and will be designed post-approval.</p> <p>Downstream habitats (e.g., Bendigo Creek) support kōaro and trout, but these are outside the project footprint.</p> <p>Pages 417, 433 of A.15 (NPSFM and aquatic ecology sections).</p>

CHECKLIST J – Listed project information requirements

Section, Fast-track Approvals Act	Information required for a substantive application under section 43(2) and section 13(4)	Application Reference	EPA (office use only)
13(4)(a)	a description of the project and the activities it involves	Part A.10, Section 3, page 129-233.	Description has been provided in A.08 - Section 1 - Introduction.pdf , pp. 6 -12 and explained in more detail on construction, operation, maintenance, rehabilitation and closure in A.10 - Section 3 - Project Description.pdf , p.2 onward.
13(4)(c)	information to demonstrate that the project does not involve any ineligible activities (other than activities that may be the subject of a determination under section 23 or 24)	Part A.15, Section 8.6, page 394-395.	Information is provided in A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.11. Clarification is provided regarding 'is not an activity occurring on land listed in Schedule 4'. Schedule 4 of the Act identifies land on which non-mining activities are ineligible and cannot be authorised by the Act. No non-mining

			<p>activities are being applied for on Schedule 4 ineligible land as part of this substantive application. It is an activity located (partly) on land held, managed and administered under the Conservation Act. Offsetting and compensation and monitoring and access activities are proposed to be undertaken on Ardgour Conservation Area and Bendigo Historic Reserve, including the establishment of Ardgour Rise, the relocated walking route to the Come-in-Time Battery and willow management activities. However, the relevant land is not listed in Schedule 4 as while these conservation areas are administered under the Conservation Act, they are not declared as wilderness or sanctuary areas.</p>
13(4)(d)	a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application	Part A.10, Section 3, page 129-233; Part C	<p>A map of project site is included here: C.01 - BOGP Location Overview.pdf and described</p>

			throughout A.09 - Section 2 - Existing Environment .pdf . See p.21 for statutory areas - The Project Site is not subject to any statutory acknowledgements within either the RPS or Proposed RPS, with the closest statutory acknowledgements to the site being the Mata-Au (Clutha River) and Te Wairere (Lake Dunstan).
13(4)(e)	the anticipated commencement and completion dates for construction activities (where relevant)	Part A.10, Section 3, page 129-322.	See A.10 - Section 3 - Project Description.pdf , pp. 93-96. The overall Project Duration is approx. 25 years, including pre-development, construction, operation, and closure phases. Construction phase is set for an indicative duration of 12-18 months for main construction activities (processing plans, TSF starter embankment, service corridor, supporting infrastructure. And a

			<p>temporary construction camp for up to 2 years during this phase.</p> <p>Closure activities will begin after the 14-year operational mine life, followed by active closure (rehab, infrastructure removal, water treatment plant setup) and then passive closure for long-term stability.</p>
13(4)(f)(i)	a statement of whether the project is planned to proceed in stages and, if so an outline of the nature and timing of the stages	Part A.10, Section 3, page 129-322.	<p>A statement and outline is provided in A.10 - Section 3 - Project Description.pdf, pp. 93-96.</p> <p><i>“The BOGP is expected to be an approximately 25-year project including pre-development, construction, operation and active closure activities.”</i></p> <p>This confirms the project will proceed in stages.</p> <p>Section 3.24.2 (Pages 94–96) provides the detailed breakdown:</p> <ol style="list-style-type: none"> 1. Start-Up Phase (p.94)

			<p>2. Project Development (main construction) (p.94-95)</p> <p>3. Operation Phase – Multiple Sub-Stages (pp. 95–96):</p> <p>Stage 1: RAS Open Pit mining starts (ore supply from month 11; processing from month 15).</p> <p>Stage 2: RAS Underground development begins in Year 6.</p> <p>Stage 3: CIT Open Pit mined (subject to ecological conditions).</p> <p>Stage 4: Backfilling CIT Open Pit with RAS overburden.</p> <p>Stage 5: SRX and SRE Open Pits mined near end of mine life.</p> <p>Operational life: ~14 years.</p> <p>4. Active Closure (p.96)</p> <p>5. Passive Closure (p. 96)</p>
13(4)(h)	a description of the anticipated and known adverse effects of the project on the environment	Part A.13, Section 6, page 276-364.	The application provides an description of anticipated and

			<p>known adverse effects of the project across multiple environmental domains in A.13 - Section 6 - Assessment of Environmental Effects .pdf (pp. 276–364). These domains include surface water and groundwater, water quality/geochemistry, terrestrial ecology and wetlands, aquatic ecology, landscape and visual, historic heritage, and other effects such as noise, vibration, dust, hazardous substances, lighting, and public access. The assessment references mitigation measures primarily through management plans.</p> <p>While the description meets the intent of the clause at a high level, several limitations are noted:</p> <ul style="list-style-type: none"> • Residual ecological effects on irreplaceable values are acknowledged but cannot be fully offset, representing
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			<p>a significant environmental risk.</p> <ul style="list-style-type: none"> • Long-term water quality mitigation relies on assumptions about treatment effectiveness over decades, introducing uncertainty. • Cultural effects are described qualitatively, with limited measurable outcomes for mana whenua aspirations.
13(4)(i)	a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991	N/A	<p>A statement 'The BOGP does not involve any activities that would be prohibited activities under the RMA.' is provided in A.11 - Section 4 - Approvals Sought .pdf, p.2.</p> <p>A number of prohibited activities are included in the H.01 - RMA Rules Assessment.pdf with comments to</p>

			show why they are not applicable to the application.
13(4)(j)	<p>a list of the persons and groups the applicant considers are likely to be affected by the project, including—</p> <ul style="list-style-type: none"> (i) relevant local authorities: (ii) iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements: (iii) other relevant iwi authorities: (iv) relevant Treaty settlement entities: (v) relevant protected customary rights groups and customary marine title groups: (vi) ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou: (vii) relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011: (viii) persons with a registered interest in land that may need to be acquired under the Public Works Act 1981: 	Part A.12, Section 5, page 255-275.	<p>A.12 - Section 5 - Consultation and Engagement .pdf, pp.1-21 provides a detailed account of persons and groups the applicant considers likely to be affected by the project. It addresses the clause requirements as follows:</p> <ul style="list-style-type: none"> (i) CODC, ORC, DOC, MCH and HNZPT, MfE (pp.2-7) (ii) engagement primarily through Aukaha and 7 Papatipu Rūnanga o Ngāi Tahu with interests in the project: <ul style="list-style-type: none"> - Te Rūnaka o Moeraki - Kāti Huirapa Rūnaka ki Puketeraki - Te Rūnaka o Ōtākou - Hokonui Rūnanga - Te Rūnaka o Awarua - Waihōpai Rūnaka

			<p>- (Plus Te Ao Mārama for Murihiku-Southland liaison)</p> <p>(iii) no additional iwi authorities beyond Kā Rūnaka and Aukaha are identified as having interests in the project area.</p> <p>(iv) Te Rūnanga o Ngāi Tahu – as the overarching iwi authority under the Ngāi Tahu Claims Settlement Act 1998, with statutory acknowledgements for Mata-au (Clutha River) and Lake Dunstan. (p.9).</p> <p>(v) Not applicable – the project is inland and does not affect marine or coastal areas.</p> <p>(vi) Not applicable – the project is not within or adjacent to Ngāti Porou rohe moana.</p> <p>(vii) Not applicable – the project does not involve marine or coastal areas.</p> <p>(viii) Owners of Bendigo Station and Ardgor Station – private</p>
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			<p>landowners where the project is located. Access agreements and written approvals are in place.</p> <p>Land Information New Zealand (LINZ) – for a small section of Ardgour Rise access route crossing Crown land. (pp.12-18)</p> <p>It is noted that the information provided is narrative, not in a consolidated list format.</p> <p>No explicit confirmation of checks for protected customary rights groups (though context suggests none apply).</p> <p>Some iwi engagement remains unresolved.</p>
13(4)(k)	<p>a summary of—</p> <p>(i) the consultation undertaken for the purposes of section 29 and any other consultation undertaken on the project with the persons and groups referred to in paragraph (j); and</p>	<p>Part A.12, Section 5, page 255-275; Part A.13, Section 6.3, page 263-264.</p>	<p>A.12 - Section 5 - Consultation and Engagement .pdf, pp.1-21 provides a record of consultation with all relevant authorities, iwi, agencies, landowners, and community groups, and by demonstrating how</p>

	(ii) how the consultation has informed the project:		feedback has shaped project design, mitigation measures, and management plans. It also incorporates cultural, environmental, and social considerations throughout. A minor limitation is that the information is presented in a narrative format rather than as a consolidated summary table; however, the detail remains.
13(4)(l)	a list of any Treaty settlements that apply to the project area, and a summary of the relevant principles and provisions in those settlements	Part A.15, Section 8.7.3.17, page 492-496.	A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf identifying the relevant Treaty settlement (Ngāi Tahu Claims Settlement Act 1998).
13(4)(m)	a description of any processes already undertaken under the Public Works Act 1981 in relation to the project	N/A	No description provided but marked as not applicable by the applicant indicating there are no processes already undertaken under the Act.

13(4)(n)	a statement of any relevant principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019	N/A	No description provided but marked as not applicable by the applicant indicating there is no relevance to this Act.
13(4)(o)	information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area	N/A	No description provided but marked as not applicable by the applicant indicating there is no parcels of relevant land within project area.
13(4)(p)	a statement of whether the applicant is seeking a determination under section 23 and, if so, an assessment of the effects of the activity on the relevant land and on the rights and interests of Māori in that land	N/A	No description provided but marked as not applicable by the applicant indicating there is no determination sought.
13(4)(q)	a statement of whether the applicant is seeking a determination under section 24(2) and, if so, a description of— <ul style="list-style-type: none"> (i) the scale and adverse effects of the existing electricity infrastructure; and (ii) how, if at all, that scale or those adverse effects are anticipated or known to change as a result of the maintenance, upgrading, or continued operation of the infrastructure 	N/A	No description provided but marked as not applicable by the applicant indicating there is no determination sought.

13(4)(r)	<p>a statement of whether the applicant is seeking a determination under section 24(4) and, if so,—</p> <ul style="list-style-type: none"> (i) a description of every alternative site considered by the applicant (or, if the referral application is lodged by more than 1 person, any of those persons) for the construction and operation of the new electricity lines (the activity); and (ii) for each alternative site considered,— <ul style="list-style-type: none"> (A) a statement of the anticipated and known financial cost of undertaking the activity; and (B) a description of the anticipated and known adverse effects of undertaking the activity; and (C) a description of the anticipated and known financial cost and practicality of available measures to avoid, remedy, mitigate, offset, or compensate for the anticipated and known adverse effects of the activity; and (D) a description of any issues (including financial cost) that would make it impractical to undertake the activity on the site; and (E) an assessment of whether it would be reasonable and practical to undertake the activity on the site, taking into account the matters referred to in 	N/A	No description provided but marked as not applicable by the applicant indicating there is no determination sought.
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	subparagraphs (A) to (D) and any other relevant matters		
13(4)(s)	a description of the applicant's legal interest (if any), or if the application is lodged by more than 1 person, the legal interest of any of those persons) (if any), in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the work	Part A.15, Section 8.4, page 388-389.	<p>See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, p.4.</p> <p>The applicant holds secure legal interests in all land required for the project. The project site is primarily located on Ardgour Station and Bendigo Station, where MGL has signed access agreements and a binding agreement to acquire the Ardgour Station land directly impacted by the project. Additional areas include road reserves administered by the Central Otago District Council and a small section of leasehold land managed by Land Information New Zealand. MGL will also obtain necessary rights such as easements, licences to occupy, and concessions from the Department of Conservation and CODC for works on land they administer.</p>

13(4)(t)	an outline of the types of consents, certificates, designations, concessions, and other legal authorisations (other than contractual authorisations or the proposed approvals) that the applicant considers are needed to authorise the project, including any that the applicant considers may be needed by someone other than the applicant	Part A.15, Section 8.4, page 388-389.	Addressed, see A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p.1
13(4)(u)	<p>whether any activities that are involved in the project, or are substantially the same as those involved in the project, have been the subject of an application or a decision under a specified Act and,—</p> <ul style="list-style-type: none"> (i) if an application has been made, details of the application: (ii) if a decision has been made, the outcome of the decision and the reasons for it: 	Part A.09, Section 2.2, page 31-36.	<p>See A.09 - Section 2 - Existing Environment .pdf</p> <p>Yes, the project and related activities have been subject to multiple applications and decisions under the Resource Management Act (RMA), Reserves Act, HNZPT Act, Wildlife Act, and Crown Minerals Act.</p> <p>All applications listed were approved, enabling exploration and supporting activities.</p> <p>Conditions typically required rehabilitation of tracks, archaeological monitoring, and ecological safeguards.</p>

			No applications for mining operations have been granted yet; these are sought under the current fast-track process.
13(4)(v)	a description of whether and how the project would be affected by climate change and natural hazards	Part A.15, Section 8.4, page 390.	Description is provided throughout multiple sections of A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf .
13(4)(w)	if the application is lodged by more than 1 person, a statement of the proposed approval to be held by each of those persons	N/A	Not applicable, application lodged by 1 authorised person
13(4)(x)	a summary of compliance or enforcement actions (if any), and the outcome of those actions, taken against the applicant (or if the application is lodged by more than 1 person, any of those persons) under a specified Act	Part A.15, Section 8.4, page 390-391.	<p>See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf, p.6.</p> <p>No enforcement actions have been taken against Matakanui Gold Ltd (MGL) under the following statutes relevant to the application:</p> <ul style="list-style-type: none"> • Conservation Act • Reserves Act • Wildlife Act

			<ul style="list-style-type: none"> • Heritage New Zealand Pouhere Taonga Act • Freshwater Fisheries Regulations <p>One compliance action occurred under the Resource Management Act (RMA):</p> <ul style="list-style-type: none"> • In May 2025, the Central Otago District Council (CODC) identified that MGL was not maintaining proper photo records as required under conditions for two resource consents (RC210507 and RC210308). • These consents authorised the construction of temporary access tracks and associated earthworks within the Dunstan Mountains ONL for mineral exploration. • Outcome: CODC recorded the breaches in the compliance
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			<p>history but did not pursue enforcement action.</p> <ul style="list-style-type: none"> • MGL has since remedied the non-compliance through improved internal permit management processes.
13(4)(y)	Please provide the information specified below for the relevant approval(s) sought. This is the information specified in the relevant schedule.		
13(4)(y)(i), clause 2 of Schedule 5	<p>Resource consent or designation</p> <p>(a) an assessment of the project against—</p> <ul style="list-style-type: none"> (i) any relevant national policy statement; and (ii) any relevant national environmental standards; and (iii) if relevant, the New Zealand Coastal Policy Statement; and 	Part A.15, Section 8.4, page 391.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf .
	(b) in relation to any proposed approval that is a resource consent, whether, to the best of the applicant's knowledge, there are any existing resource consents of the kind referred to in section 30(3)(a).	Part A.15, Section 8.4, page 391.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf Explicitly stating that no existing resource consents of the same kind exist, supported by

			formal confirmation from CODC and ORC.
13(4)(y)(ii), clause 3 of Schedule 5	Change or cancellation of resource consent condition The information to be provided under section 13(4)(y)(ii) is information about whether and how the change or cancellation of the condition is material to the implementation or delivery of the project.	N/A	Not applicable to the application
13(4)(y)(iii), clause 4 of Schedule 5	Certificate of compliance The information required to be provided under section 13(4)(y)(iii) is information that shows the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent. Include information that shows that the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent.	N/A	Not applicable to the application
13(4)(y)(iv), clause 2 of Schedule 6	Concession (1) The information in subclause (2) is required to be provided under section 13(4)(y)(iv) if a proposed concession includes a lease and—	Part A.15, Section 8.4, page 391.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , p. 5.

	<p>(a) the lease would be for a term (including any renewals) that will or is likely to be more than 50 years; and</p> <p>(b) the granting of the lease would trigger a right of first refusal or a right of offer or return.</p> <p>(2) Confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return to waive that right for the purposes of the proposed lease.</p>		<p>Application does not include any concession that involves a lease exceeding 50 years. The concessions sought are for easements and permits (e.g., Ardgour Rise road alignment, SH8 intersection upgrades, walking track relocation, willow management, and monitoring bores). Therefore: No lease triggers a right of first refusal or right of offer or return, and Confirmation of waiver is not applicable.</p>
13(4)(y)(v), clause 23 of Schedule 6	<p>Land exchange</p> <p>(1) The information required to be provided under section 13(4)(y)(v) is (a) - (e) below:</p> <p>(a) a description of both land areas proposed for exchange (for example, maps showing areas and location, addresses, and legal descriptions where possible:</p>	N/A	Not applicable to the application
	<p>(b) the financial value of the land proposed to be acquired by the Crown:</p>	N/A	Not applicable to the application

	(c) a brief description of the conservation values of both pieces of land, including an explanation of why the exchange would benefit the conservation estate:	N/A	Not applicable to the application
	(d) if the land exchange would trigger a right of first refusal or a right of offer or return, confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return that the holder has agreed to waive that right for the purpose of the land exchange:	N/A	Not applicable to the application
	(e) confirmation by the applicant that no part of any land to be exchanged by the Crown is – (i) land listed in Schedule 4; or (ii) a reserve declared to be a national reserve under section 13 of the Reserves Act 1977	N/A	Not applicable to the application
13(4)(y)(vi), clause 2 of Schedule 9	Standard or complex freshwater fisheries activity approval (2) The information required to be provided under section 13(4)(y)(vi) is the following: (a) whether an in-stream structure is proposed (including formal notification of any dam or diversion structure) and the extent to which this may impede fish passage; and	Part A.15, Section 8.4, page 391-392.	See A.15 - Section 8 - Fast-Track Approvals Act 2024 Requirements .pdf , pp. 78-79 and 85-86. The application identifies that in-stream structures, including stream diversions and the Tailings Storage Facility (TSF), are proposed and describes their design and purpose.

	(b) whether any fish salvage activities or other complex freshwater fisheries activities are proposed.		It confirms that fish passage will not be impeded because no fish species are present in the affected streams. It also states that no fish salvage activities or other complex freshwater fisheries activities are required.
13(4)(y)(vii), clause 2 of Schedule 10	Marine consent (1) The information required to be provided under section 13(4)(y)(vii) is– (a) information about whether the Minister of Conservation is an affected person:	N/A	Not applicable to the application
	(b) additional information about whether the applicant has already made an application for a consent under the EEZ Act in relation to the project, and, if so,— (i) details of any application made; and (ii) the decisions made on that application; and (iii) information about the matters that the Minister may consider under section 22(6):	N/A	Not applicable to the application

	(c) additional information (in a summary form) about compliance or enforcement action taken against the applicant by the EPA under the EEZ Act.	N/A	Not applicable to the application
13(4)(y)(viii), clause 2 of Schedule 11	Access arrangement (1) Confirmation that the applicant has complied with section 12(2) (for the purposes of section 13(4)(y)(viii)).	N/A	Not applicable to the application

13(4)(y)(ix), clause 15 of Schedule 11	Mining permit (1) For the purposes of section 13(4)(y)(ix), the information is— <ul style="list-style-type: none"> (a) a copy of the relevant exploration permit or existing privilege to be exchanged for a mining permit that entitles the holder to mine a Crown owned mineral: (b) the name and contact details of the proposed permit participants and the proposed permit operator: (c) a proposed work programme for the proposed permit, which may comprise committed work, committed or contingent work, or both: (d) evidence of the technical or financial capability of the proposed permit holder to comply with and give proper effect to the work programme: (e) information about the proposed permit holder's history of compliance with mining or similar permits and their conditions: (f) the proposed date on which the substantive application is intended to be lodged: (g) if the authorised person proposes to provide information under section 37, the date on which the person intends to provide that information: 	N/A	Not applicable to the application
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	<p>(h) the proposed duration of the permit:</p> <p>(i) if the proposed approvals include a mining permit for petroleum,—</p> <p>(i) a map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be same area as the area over which the mining permit application is intended to be made), and the extent of the resource to which the development plan relates:</p> <p>(ii) the resources and reserves relating to the project, estimated in accordance with the Petroleum Resources Management System:</p> <p>(iii) a high-level overview of the following:</p> <p>(A) the proposed field development plan:</p> <p>(B) the proposed date for the commencement of petroleum production:</p> <p>(C) the economic model for the project:</p> <p>(D) the proposed duration of the proposed mining permit:</p> <p>(E) decommissioning plans:</p>		
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	<p>(j) if the proposed approvals include a mining permit for minerals other than petroleum,—</p> <p>(i) a map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be same area as the area over which the mining permit application is intended to be made), and the extent of the resource and reserves to which the development plan relates:</p> <p>(ii) for minerals other than gold or silver, a report or statement confirming the ownership of the minerals targeted:</p> <p>(iii) whether the application will be for a Tier 1 or Tier 2 permit:</p> <p>(iv) an estimate of the mineral resources and reserves relating to the project, including a summary on acquisition of the data and the data underpinning the estimate (such as information on sample locations, grade, and geology):</p> <p>(v) an indicative mine plan:</p> <p>(vi) a high-level overview of the following:</p> <p>(A) the proposed mining method:</p>		
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	<p>(B) the proposed date for the commencement of mining and estimated annual production:</p> <p>(C) the economic model for the project:</p> <p>(D) the status of or anticipated timing for completing any prefeasibility or feasibility studies:</p> <p>(E) the proposed methods for processing mined material and handling and treating waste:</p> <p>(F) anticipated plans for mine closure and rehabilitation.</p> <p>(2) For the purpose of subclause (1)(j)(iv), for a Tier 1 permit application the resources and reserves relating to the project are to be estimated in accordance with a recognised reporting code such as JORC or NI 43-101.</p>		
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Appendix 2: Consultation Summary

The following agencies were consulted with to inform the assessment of the application for completeness. Each agency was requested to confirm whether the application documentation provided by the EPA regarding the proposal as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose of the Act in accordance with section 44 of the Act.

1. Consultation with Otago Region Council (ORC), Central Otago District Council (CODC) as the relevant consent authority and the **Ministry for the Environment** as the administering agency for the following approvals under the Resource Management Act 1991:

- Resource consent (section 42(4)(a) of the Act)

Response received from **Otago Region Council (ORC)**: [Matakanui Gold Ltd s.46 Completeness Assessment Letter - 11 Nov 2025.pdf](#)

Response received from **Central Otago District Council (CODC)**: [FTAA-2507-1089 CODC COMPLETENESS CHECK.pdf](#), [FTTA-2507-1089 - s46 Completeness Assessment - CODC Table A - Final 12112025.pdf](#), [CODC E250026 First Notice Letter.pdf](#), [CODC Response letter - Section 30 of the FTAA.pdf](#)

Response received from **Ministry for the Environment**: [Bendigo-Ophir Gold Project - Section 46 letter.pdf](#)

2. Consultation with the Department of Conservation (DOC) as the administering agency for the following Acts

- Concession that would otherwise be applied for under the Conservation Act 1987 (section 42(4)(e) of the Act)
- Amendment or revocation regarding a conservation covenant under section 27 of the Conservation Act 1987 (section 42(4)(g) of the Act)
- a wildlife approval (as defined in clause 1 of Schedule 7 of the Act) (section 42(4)(h) of the Act)
- an approval or a dispensation that would otherwise be applied for under regulation 42 or 43 of the Freshwater Fisheries Regulations 1983 in respect of a complex freshwater fisheries activity (section 42(4)(j) of the Act)

Response received from **DOC**: [FDB001602C7Z5](#)

3. Consultation with the Heritage New Zealand Pouhere Taonga (HNZPT) as the administering agency for the following Acts

- an archaeological authority described in section 44(a) or (b) of the Heritage New Zealand Pouhere Taonga Act 2014

Response received from **HNZPT**: [ss 46 47 Completeness and Competing Interests.pdf](#)