

**From:** Rogan Colbourne  
**Sent:** Wednesday, 29 October 2025 3:29 pm  
**To:** Sally Clarkson  
**Cc:** Marie Payne  
**Subject:** RE: Bendigo-Ophir Gold Project - fast track pre-lodgement consultation

Hi Sally and Marie. Here is my review. Basically, not as concerned with effect on adult birds as I would be on lizards and invertebrates. However, some nests could be deserted if too close to mining operations. Still waiting on them for how they are going to react to disturbed birds through their AEE, especially if falcon are nesting nearby. I haven't put in spreadsheet as don't have the remedies until they list them. I could do that on Monday s9(2)(a), cheers Rogan

### **Bendigo Avifauna values Assessment- Rogan Colbourne Technical Advisor Avifauna**

Document reviewed  [2352 Matakanui avifauna values 8August2025.issued.pdf](#)

I am happy with the quality of the report being a combination of desktop and field surveys.

They have identified three species of interest: falcon, pipit and black shag.

Fortunately, the birds identified in the affected area are fairly mobile, and unlike lizards and some invertebrates are likely to fly out of harm's way. There could be some nests that could be disturbed. Pipits prefer the surrounding rough pasture, but some nests could be disturbed by noise if nests are too close to roads or the pit. With falcon it is easy to determine nesting by swooping behaviour.

Falcons have huge territories averaging 23 square kilometres per pair (in the Cadrona area) so it is unlikely there would be more than one to two pairs in the area. This disturbance would occur over a small proportion of their territories given the whole area will not be mined at any one time. They have outlined the threat of uninsulated power poles and other electrical infrastructure such as transformers. Should a nest be made in the mining zone, mining could be halted until the young have fledged.

Possibly noise from the mining may deter the birds.

A black shag flew over the site during the survey, but they are not resident given the ponds are not likely to provide much food.

If any removal of crack willow was to take place it would be preferable to be done in autumn so that nests of smaller native birds such as grey warblers and tomtits would not be destroyed.

The quality of the wetlands and ponds is not sufficient to entice rare waders or waterfowl.

**There is lack of discussion of mitigation given some eggs and nestlings could be killed due to noise disturbance if nesting too close to roads and blasting sites. The report states "This baseline values assessment and the direct and potential indirect effects outlined in this report will aid in the preparation of the Assessment of Environmental Effects (AEE), and in managing potential impacts from mining operations."**

**They still need to prepare this document.**

Other documents

- Exterior Lighting Report (Cosgroves)  [CQ24020 BOGP Exterior Lighting Report Rev C FINAL.pdf](#) This was not relevant as light levels are reduced and it is not on any major migration routes that would confuse flight paths.
- Assessment of Noise and Vibration Effects (Marshall Day) – again not relevant unless birds nesting very close to mining, however average noises under 50 dB are not too extreme.  [Assessment Of Noise & Vibration Effects FINAL.pdf](#)
- Noise & Vibration Management Plan (Marshall Day)  [Noise and Vibration Management Plan.pdf](#) see comments above.

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**From:** Sally Clarkson <sclarkson@doc.govt.nz>

**Sent:** Tuesday, 28 October 2025 5:14 pm

**To:** Rogan Colbourne <rcolbourne@doc.govt.nz>

**Cc:** Marie Payne <mpayne@doc.govt.nz>

**Subject:** RE: Bendigo-Ophir Gold Project - fast track pre-lodgement consultation

Hi Rogan

Just following up on my emails below to check where you are at with regards to reviewing the following documents:

- Avifauna Values Assessment (RMA Ecology)  [2352 Matakanui avifauna values 8August2025.issued.pdf](#)
- Exterior Lighting Report (Cosgroves) – may or may not be relevant?  [CQ24020 BOGP Exterior Lighting Report Rev C FINAL.pdf](#)
- Assessment of Noise and Vibration Effects (Marshall Day) – again may or may not be relevant  [Assessment Of Noise & Vibration Effects FINAL.pdf](#)
- Noise & Vibration Management Plan (Marshall Day)  [Noise and Vibration Management Plan.pdf](#)

We understand that the applicant is likely to be lodging the application imminently and we would really like to get our feedback to them before that happens.

If you could please provide a summary of the documents above that would be much appreciated, before the end of the week ideally.

The summary documents for heritage, freshwater, wildlife etc can be found at the link below to give you an idea of how we are presenting the feedback to the applicant. I have attached a blank template for you to use for your feedback.

 [Feedback for applicant](#)

Thanks, and let us know if you have any questions.

Sally

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**From:** Sally Clarkson

**Sent:** Monday, 1 September 2025 2:36 pm

**To:** Rogan Colbourne <[rcolbourne@doc.govt.nz](mailto:rcolbourne@doc.govt.nz)>; Max Crowe <[max@fieldlab.nz](mailto:max@fieldlab.nz)>

**Cc:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>; Richard Ewans <[rewans@doc.govt.nz](mailto:rewans@doc.govt.nz)>

**Subject:** RE: Bendigo-Ophir Gold Project - fast track pre-lodgement consultation

Hi Rogan & Max,

Santana have recently shared two more reports with us in relation to avifauna and wetlands values. These reports both feed into the overall Ecological Assessment of Effects that we have not been provided with yet.

- Avifauna Values Assessment  [2352 Matakanui avifauna values 8August2025.issued.pdf](#) (Rogan)
- Wetland Values Assessment  [2352 Matakanui wetland values.8August2025.issued.pdf](#) (Max)

Could you both please review the reports relating to your areas of expertise and provide comments/assessment including:

- An assessment relating to the conservation values affected
- Key findings, summary, conclusions and critical issues
- Your thoughts on potential compensation/mitigation/offsetting/avoidance possibilities – (noting that an advisor on compensation will also support the project)
- Any critical information gaps (taking into account the other reports we are anticipating will be provided, where possible).

Please also see the information in the email below that was sent out originally when the first technical reports came in from the applicant. It includes information on where the relevant documents are saved and where to upload your assessment. If your assessments could be completed and uploaded by Monday 8<sup>th</sup> September that would be appreciated.

Let me know if you have any questions regarding this.

Sally

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**From:** Sally Clarkson

**Sent:** Tuesday, 12 August 2025 4:24 pm

**To:** Richard Ewans <[rewans@doc.govt.nz](mailto:rewans@doc.govt.nz)>; Nicholas Dunn <[ndunn@doc.govt.nz](mailto:ndunn@doc.govt.nz)>; Carl Jones <[cajones@doc.govt.nz](mailto:cajones@doc.govt.nz)>; Warren Chinn <[wchinn@doc.govt.nz](mailto:wchinn@doc.govt.nz)>; Darcy Liddell <[dliddell@doc.govt.nz](mailto:dliddell@doc.govt.nz)>;

Liz Williams <[lwilliams@doc.govt.nz](mailto:lwilliams@doc.govt.nz)>; Matt Schmidt <[mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz)>; Rogan Colbourne

<[rcolbourne@doc.govt.nz](mailto:rcolbourne@doc.govt.nz)>; Mandy Tocher <[Mandy.Tocher@wildlands.co.nz](mailto:Mandy.Tocher@wildlands.co.nz)>

Cc: Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>; Emma Fahey <[efahey@doc.govt.nz](mailto:efahey@doc.govt.nz)>; Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Pauline Marshall <[pamarshall@doc.govt.nz](mailto:pamarshall@doc.govt.nz)>; Clare Fleming <[cfleming@doc.govt.nz](mailto:cfleming@doc.govt.nz)>; Debbie Lewis <[delewis@doc.govt.nz](mailto:delewis@doc.govt.nz)>

**Subject:** Bendigo-Ophir Gold Project - fast track pre-lodgement consultation

Kia ora everyone

As you are aware, and following our project initiation meetings, Santana Minerals Ltd are looking to apply for approval under the Fast Track Approvals Act to mine gold deposits on Bendigo and Ardgour Stations.

**Summary of technical reports:**

As part of pre-lodgement consultation, Santana have now shared a series of technical reports with DOC. We are anticipating more reports to come which will have a significant conservation focus – relating mainly to ecology (habitat, avifauna, lizards, terrestrial invertebrates, pest management plans etc), hydrology, contaminated land, and planning. For your reference, a list of all reports that Santana have commissioned (and we are expecting to receive as part of pre-lodgement consultation) are included in the Register of Technical Reports saved here: [Register of Technical Reports - Bendigo-Ophir updated 11.8.25.xlsx](#). The reports in red font are the reports DOC is yet to receive.

As DOC has now received a number of the reports, we would like to get you underway with reviewing the reports and providing comment in your respective areas of expertise. As a starting point, I have been through the technical reports that have been shared and have compiled a summary. It is saved here: [Technical Report Summary - Bendigo-Ophir Gold Project.docx](#)

The summary document provides a brief scope for each report, potential effects, any mitigations included, where DOC's interest is expected to sit and who at DOC may be best placed to provide comment. Please feel free to add notes (and tag your name) if you have comments to add or believe we haven't identified the relevant expertise or commenting on this issue may not be a primary focus for DOC.

It would be appreciated if you could please review the reports relevant to your area of expertise (the summary includes who we believe the relevant expert is, as well as links to the reports) and provide the following:

- An assessment relating to the conservation values affected
- Key findings, summary, conclusions and critical issues
- Your thoughts on potential compensation/mitigation/offsetting/avoidance possibilities – (noting that an advisor on compensation will also support the project)
- Any critical information gaps (taking into account the other reports we are anticipating will be provided, where possible).

Once complete please save your comments/assessments here: [Technical Experts Assessments](#)

**GIS shape files:**

Santana has also provided GIS shape files for a series of things including the project footprint, concessions areas etc. These can be found here: [GIS shape files](#). The files can be assessed and viewed via DOC's GIS. Let me know if you need any help with this. You can use these shape files to help inform your analysis and research. If technical reports aren't yet available for your area of expertise and undertaking some background analysis will help inform your future commentary, please progress with some initial background research.

If possible, we would love to have your summaries in two weeks time, by 26<sup>th</sup> August, but do let me know if there are any issues with meeting this date (I can see that Matt is away until then).

Please record your time spent on these tasks in the Workflow tool and cap the time spent to 10 hours each (if a technical report is not yet available for your review, please limit background research to 4 hours). If more time is needed, please let Marie or I know before proceeding. It is not necessarily an issue, but we do need to keep track of pre-lodgement costs and manage expectations with the applicant.

If you have any questions or have trouble with any links etc please let me know. It was also previously suggested some technical subgroups maybe helpful – if you would like us to progress with establishing these also get in touch. This is all new territory so happy to move and pivot to ensure DOC is well placed to provide feedback on this proposal and prepare for the lodgement of the application.

Thanks  
Sally

**Sally Clarkson**

Senior Planner Fast Track Applications  
Whare Kaupapa Atawhai | Conservation House  
18 Manners Street  
Te Whanganui-a-Tara | Wellington

*Please note: My work days are Mondays and Tuesdays*

## Email correspondence 2

**From:** Marine Richarson  
**Sent:** Wednesday, 29 October 2025 9:34 am  
**To:** Nicholas Dunn; Marie Payne; Sally Clarkson; Pene Williams; Dean van Mierlo; Charlotte Grey; Darcy Liddell  
**Cc:** Liz Williams; John Roberts  
**Subject:** Re: Freshwater Fisheries Approvals/Freshwater and Hydrology discussion

Hi Marie,  
A quick question for me. Reading the FW feedback about the loss of waterways within the project area, I am wondering whether this could be considered damming or diversion of waterways? As such it might also be a matter of Complex Fisheries approval - unless I'm mistaken.  
Regards,  
Marine

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**From:** Nicholas Dunn <ndunn@doc.govt.nz>  
**Sent:** Wednesday, October 29, 2025 9:22:40 AM  
**To:** Marie Payne <mpayne@doc.govt.nz>; Sally Clarkson <sclarkson@doc.govt.nz>; Marine Richarson <mricharson@doc.govt.nz>; Pene Williams <pwilliams@doc.govt.nz>; Dean van Mierlo <dean@environmentalbarrister.co.nz>; Charlotte Grey <cgrey@doc.govt.nz>; Darcy Liddell <dliddell@doc.govt.nz>  
**Cc:** Liz Williams <lwilliams@doc.govt.nz>; John Roberts <jroberts@doc.govt.nz>  
**Subject:** RE: Freshwater Fisheries Approvals/Freshwater and Hydrology discussion

Hi Marie,  
I've reviewed the suggested amendments to the text in the freshwater feedback, most have been accepted, some reworded. Feel free to send.

Regards

Nicholas

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**From:** Marie Payne <mpayne@doc.govt.nz>  
**Sent:** Tuesday, 28 October 2025 17:46  
**To:** Nicholas Dunn <ndunn@doc.govt.nz>; Sally Clarkson <sclarkson@doc.govt.nz>; Marine Richarson <mricharson@doc.govt.nz>; Pene Williams <pwilliams@doc.govt.nz>; Dean van Mierlo <dean@environmentalbarrister.co.nz>; Charlotte Grey <cgrey@doc.govt.nz>; Darcy Liddell <dliddell@doc.govt.nz>  
**Cc:** Liz Williams <lwilliams@doc.govt.nz>; John Roberts <jroberts@doc.govt.nz>  
**Subject:** Freshwater Fisheries Approvals/Freshwater and Hydrology discussion

Hey team,

As per todays meeting – please see the below email to Santana.

Also here [DOC applicant feedback Freshwater Oct 2025 FINAL.docx](#) with a couple of minor track changes is the Freshwater Fisheries Feedback I will send in a separate email tomorrow - if you have feedback please let me know before 12noon tomorrow.

Although the two issues are related DOC's role in relation to commenting on them both is different i.e. for Freshwater Fisheries Approvals, we are an administering agency, for any more general commentary around effects (not related to a conservation approval we are not. but we will be invited to comment on broader aspects of the application –

s9(2)(h)

Kind regards,

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Hi s9(2)(a)

*Thanks for your email advising us of the Freshwater Fisheries Approvals you are seeking to apply for as part of the Fast-track application process (as per the email attached).*

*Our experts have reviewed the email as attached and the associated assessments provided to date. To be able to provide any meaningful or appropriate commentary/feedback on Freshwater Fisheries Approvals and to inform a broader consideration of effects (and provide feedback) as part of the pre-lodgement consultation process DOC needs further information to understand the existing site context. With that in mind if you are able to share the Ecological Reports referenced in assessments provided below (which we understand contain broader survey information).*

- *E<sup>3</sup> Scientific 2023 Report – Referenced in the Mine Closure Plan prepared by Mine Closure Management Pty Ltd and Water Ways Consulting's report Bendigo Ophir Gold Project: Assessment of Effects on Aquatic Habitat references this report around 17 times*
- *Kōmanawa Solutions Ltd. 2025. Post Closure Impacts of Bendigo Ophir Gold Deposit on the Ardour Aquifer. Report: Z24002.2 prepared by Kōmanawa Solutions Ltd for Matakanui Gold Ltd*

*I am aware that previous advice is that no further information will be shared prior to reports being finalised but particularly given the first report is a past reference it would be useful if you are able to provide in this part of the process.*

*Kind regards,*

**Marie Payne**

Programme Lead Fast Track Applications

# Email correspondence 3

**From:** John Roberts  
**Sent:** Tuesday, 28 October 2025 5:55 pm  
**To:** Dean van Mierlo; Marie Payne; Matt Schmidt  
**Subject:** Bendigo - s9(2)(h)

s9(2)(h)

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JR

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**From:** Dean van Mierlo <dean@environmentalbarrister.co.nz>  
**Sent:** Friday, 24 October 2025 3:08 pm  
**To:** Marie Payne <mpayne@doc.govt.nz>; Nicholas Dunn <ndunn@doc.govt.nz>; Rogan Colbourne <rcolbourne@doc.govt.nz>; Warren Chinn <wchinn@doc.govt.nz>; Carl Jones <cajones@doc.govt.nz>; Darcy Liddell <dliiddell@doc.govt.nz>; Liz Williams <lwilliams@doc.govt.nz>; Pene Williams <pwilliams@doc.govt.nz>; John Roberts <jroberts@doc.govt.nz>; Matt Schmidt <m Schmidt@doc.govt.nz>; Clare Fleming <cfleming@doc.govt.nz>; Debbie Lewis <delewis@doc.govt.nz>; DLVC\_FIELDLAB - MAX M L CROWE <max@fieldlab.nz>; David Griffin <dgriffin@doc.govt.nz>; Elizabeth Esson <eesson@doc.govt.nz>; Mandy Tocher <mtocher@lizardexpertnz.co.nz>; Marine Richarson <mricharson@doc.govt.nz>  
**Cc:** Jenni Fitzgerald <jefitzgerald@doc.govt.nz>  
**Subject:** RE: Bendigo catch up

s9(2)(h)

Regards  
Dean

**Dean van Mierlo**, Barrister; Resource Management and Environmental Law.  
office/home 03 7311070; email [dean@environmentalbarrister.co.nz](mailto:dean@environmentalbarrister.co.nz)  
post CMB 45 Punakaiki, RD1 Runanga, West Coast 7873, NZ.  
[www.environmentalbarrister.co.nz](http://www.environmentalbarrister.co.nz)

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s9(2)(h)

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**From:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Sent:** Thursday, 23 October 2025 6:16 pm

**To:** Nicholas Dunn <[ndunn@doc.govt.nz](mailto:ndunn@doc.govt.nz)>; Rogan Colbourne <[rcolbourne@doc.govt.nz](mailto:rcolbourne@doc.govt.nz)>; Warren Chinn <[wchinn@doc.govt.nz](mailto:wchinn@doc.govt.nz)>; Carl Jones <[cjones@doc.govt.nz](mailto:cjones@doc.govt.nz)>; Darcy Liddell <[dliddell@doc.govt.nz](mailto:dliddell@doc.govt.nz)>; Liz Williams <[lwilliams@doc.govt.nz](mailto:lwilliams@doc.govt.nz)>; Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Matt Schmidt <[mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz)>; Clare Fleming <[cfleming@doc.govt.nz](mailto:cfleming@doc.govt.nz)>; Debbie Lewis <[delewis@doc.govt.nz](mailto:delewis@doc.govt.nz)>; DLVC\_FIELDLAB - MAX M L CROWE <[max@fieldlab.nz](mailto:max@fieldlab.nz)>; David Griffin <[dgriffin@doc.govt.nz](mailto:dgriffin@doc.govt.nz)>; Elizabeth Esson <[eesson@doc.govt.nz](mailto:eesson@doc.govt.nz)>; Mandy Tocher <[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz)>; Marine Richarson <[mricharson@doc.govt.nz](mailto:mricharson@doc.govt.nz)>; Dean van Mierlo <[dean@environmentalbarrister.co.nz](mailto:dean@environmentalbarrister.co.nz)>

**Cc:** Jenni Fitzgerald <[jefitzgerald@doc.govt.nz](mailto:jefitzgerald@doc.govt.nz)>

**Subject:** Bendigo catch up

Hi all,

Apologies again for the cancelation of the meeting today and late notice. Hope everyone is faring okay with the wild weather.

Updates below and I will schedule a project meeting for tomorrow but no pressure to attend if you do have other commitments. It will be an opportunity to discuss the below and any further questions.

#### Lodgement – anticipated end of Oct/Early Nov

- **Timeframes** - From comms with the applicant I think it is likely that they will lodge very shortly
- **Resourcing** is a key focus and I will circulate the roles/responsibilities document tomorrow which sets out the different stages once the applicant has lodged and where each one of the project team will feed into the process
  - **Permissions** – Darcy and Carl – given the amount of concession activities and wildlife approvals being sought I think we might need some extra help here, at least for completeness (I have contacted Christine and Stef about this). I have asked the applicant to confirm what they will be seeking (as they had added 'new' concessions in following our last meeting) and the complexity of the Wildlife approvals has never been articulated in detail.
  - **BHV** – Once the application is lodged our permissions advisors will need BHV advisors to be responsive to requests on the adequacy of information and may have technical questions – so please plan around this and lets discuss any potential issues/resourcing capacity
- **Completeness** The first task we will have from the EPA is providing DOC's view on whether the conservation approvals meet the information requirements (black and white is the information required by the act there) and secondly is it sufficient for the purpose its required – e.g. for us to write a report which advises the panels.

#### Ongoing feedback

- **Status** – It seems unlikely that our feedback has or will influence the content of the application at this stage and perhaps the applicant is anticipating this will form part of the process. However, experience to date is that working through issues and opportunities will continue concurrently as the application is lodged so we will continue to present our feedback to the applicant based on the information provided to date.
- **Feedback** - Thanks to all that have provided feedback on the assessments to date, we have taken your feedback and put it into a standard template to make it clear what our key concerns are, how we believe they will impact the application (and its assessment) alongside what we would anticipate needs to be addressed and how. If you have a request from myself or Sally please treat this as a priority as we want to get all feedback to the applicant early next week.
  - **Concessions – Sent** - JR to provide some follow up comments following site visit.  [PDF's sent to applicant](#)
  - **Heritage** – This will be sent to the applicant tomorrow AM and is here FYI  [Draft DOC applicant feedback Heritage Sept 2025 \(1\).docx](#)
  - **Wildlife**
    - **lizards** for review with Mandy
    - **Invertebrates** for review with Warren
    - **Freshwater**
    - **Aquatic Ecology** - for review with Nicholas – Nicholas can you also identify any questions/issues we may want council to include in their scope to an external consultant?
    - **Freshwater fisheries approvals** – Marine the applicant has recently provided this email setting out what they will be seeking (it isn't a draft application document but an outline)  [Re BOGP and DOC catch up.msg](#) there are also a number of assessments in the workflow that might help and Nicholas feedback (if you need any help navigating this let me know – but it would be good if we have any high level feedback to send this ASAP)

- **Avifauna** – Rogan are you able to provide an update on this?
- **Covenant** – We haven't provided any direct feedback on this but I assume it will be informed from the key points across our assessments so will work on summarising this – s9(2)(h)

[Redacted]

**General**

- **Strategic approach** – Next weeks catch up will primarily be used to summarise the overall 'critical issues' and opportunities in relation to the proposal – to further align our future feedback based on our assessments to date
- **RMA S53 and Section 51 comments** – Liz/Dean/Pene/Carl/Darcy/Clare/JR – I have set up a session so we can identify clear scope in relation to S51 and S53 comments
- **Other agencies** – The applicant has ok'd us to share our feedback with other agencies so we will progress to this once we have shared with the applicant.

Any questions please let me know.

Kind regards,

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

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## Email correspondence 4

**From:** Marie Payne  
**Sent:** Tuesday, 28 October 2025 12:37 pm  
**To:** Sally Clarkson  
**Subject:** FW: DOC updated documents request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Sorry Sally – as below.

Kind regards,

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

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**From:** Marie Payne  
**Sent:** Tuesday, 28 October 2025 8:07 am  
**To:** John Roberts <jroberts@doc.govt.nz>; Pene Williams <pwilliams@doc.govt.nz>; Dean van Mierlo <dean@environmentalbarrister.co.nz>  
**Cc:** Carl Jones <cajones@doc.govt.nz>; Marine Richarson <mricharson@doc.govt.nz>; Darcy Liddell <dliddell@doc.govt.nz>; Liz Williams <lwilliams@doc.govt.nz>  
**Subject:** FW: DOC updated documents request

Hi all,

I asked Satana to clarify which approvals they will be applying for (as they have added things in recently) below is the most recent email. I am using this to plan the teams resources for completeness (albeit – Darcy there is still not much detail on the Wildlife approvals front just FWF).

This is just an FYI no action required.

Kind regards,

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanganui-a-Tara | Wellington

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Mobile: [REDACTED]



## Department of Conservation *Te Papa Atawhai*

**From:** [REDACTED] <[REDACTED]@mitchelldaysh.co.nz>

**Sent:** Friday, 24 October 2025 4:09 pm

**To:** Marie Payne <mpayne@doc.govt.nz>; [REDACTED] <[REDACTED]@santanaminerals.com>

**Cc:** [REDACTED] <[REDACTED]@santanaminerals.com>

**Subject:** RE: DOC updated documents request

Hi Marie

Sorry for getting back to you. We are, and continue to be, fully occupied trying to complete the Fast-track application documentation. However, as requested, the following sets out what MGL will be applying for within the administrative jurisdiction of the Department of Conservation.

### **Ardgour Rise Concession Area**

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 as follows:

- The establishment and maintenance of a portion of the realigned Thomson Gorge Road (i.e. Ardgour Rise) (largely within an existing easement providing for access) which consists of an approximately 4 m wide 4WD gravel track and any associated vegetation clearance, earthworks and construction activities (including erosion and sediment control measures). Included within the ambit of this concession is the realignment of the Chorus fibre optic cable (currently located within Thompson Gorge Road) within the Ardgour Rise alignment.

### **SH8 Concession Area**

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 as follows:

- Safety improvement upgrades within the existing road reserve at the SH8 / Ardgour Road intersection, which includes:
  - The formation of a 3.5 m wide right turn bay on SH8;
  - The reprofiling of the existing roadside safety barrier on Ardgour Road to follow the new road edge alignment;
  - The widening of the SH8 road carriageway and provision of 1.5 m wide road shoulders; and
  - New pavement marking and give way controls; and
- All associated construction activities including the establishment of construction laydown areas, erosion and sediment control measures, any necessary culverts and temporary traffic management measures.

### **Come-In-Time Concession Area**

A concession (permit) for activities occurring on public conservation land within the Bendigo Historic Reserve as follows:

- The replacement of the existing walking track to the Come-in-Time Battery via a new marked route west of the battery location (and corresponding closure of the existing short walking track between Thomson Gorge Road and the battery). This route will be comprised of marker poles and / or small-scale trail markers to guide walkers and will include the installation of a welcome / information sign at the start of the track at Blue Mines Road; and
- Any incidental vegetation clearance (including briar) using hand tools only to enable the route.

### **Willow Concession Area**

A concession (permit) for activities occurring on public conservation land within the Bendigo Historic Reserve as follows:

- The management of crack willows along the Bendigo and Clearwater Creeks, which will include (with agreement of the Department of Conservation) the spraying of herbicide to kill willow trees, the progressive and / or partial removal of willow trees, and the partial replacement of cover with native vegetation;
- All necessary associated vegetation clearance and land disturbance activities (including the formation of access tracks) and replacement planting activities; and
- Monitoring activities within the first four years of spraying crack willows to monitor any regrowth of crack willow and native scrub along riparian zone.

### **Water Monitoring Concession Area**

A concession (permit) for activities occurring on public conservation land within the Bendigo Historic Reserve as follows:

- The establishment and use of a surface water flow meter (RS-03) in the bed of Bendigo Creek and the establishment and use (including drilling) of a groundwater monitoring bore (GW04) on adjacent land; and
- The use of an existing access track from Thomson Gorge Road within the Project Site to access the water monitoring infrastructure described above and undertake any necessary maintenance works.

### **Bendigo Conservation Covenant**

Partial uplift of the Bendigo Conservation Covenant (within part of Bendigo Station).

### **Wildlife Approval**

I'm still awaiting details on this from the Ecologists.

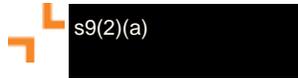
### **Freshwater Fisheries Regulations**

A dispensation under Regulation 43 (damming or diverting a watercourse) under the Freshwater Fisheries Regulations in relation to:

- The Shepherds CWDC - being the realignment of Shepherds Creek around the Shepherds Service Corridor and Processing Plant Area within the Shepherds Valley Site;

- Various clean water diversion channels with the Shepherds Creek catchment - being the diversions of the Shepherds Creek and associated tributaries around the TSF, Shepherds ELF and other mine components; and
- Various clean water diversion channels within the Rise and Shine Creek catchment - being diversions of the Rise and Shine Creek and associated tributaries around the SRX ELF, SRX Open Pit and RAS Open Pit.

Regards

 s9(2)(a)

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---

**From:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Sent:** Wednesday, October 22, 2025 2:51 PM  
**To:**  <[s9\(2\)\(a\)@santanaminerals.com](mailto:s9(2)(a)@santanaminerals.com)>  
**Cc:**  <[s9\(2\)\(a\)@mitchelldaysh.co.nz](mailto:s9(2)(a)@mitchelldaysh.co.nz)>  
**Subject:** RE: DOC updated documents request

Hey both,

Just following this up.

In relation to the application report what I am looking for is a table which sets out specifically the different activities/approvals that will be sought through DOC as an administering agency e.g. concessions and then a list of the activities, wildlife same but including species, Freshwater fisheries etc...)

Kind regards,

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: 



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Marie Payne  
**Sent:** Tuesday, 21 October 2025 3:27 pm  
**To:** [REDACTED]@santanaminerals.com>  
**Cc:** [REDACTED]@mitchelldaysh.co.nz>  
**Subject:** DOC updated documents request

Hey [REDACTED]

I was wondering if you had a more recent update of the BOGP Working Draft Substantive Application Report (the version we have is dated 29/08/2025) and I am thinking this one likely misses out a few approvals now?

During the previous presentation a few of the proposed management plans were referred to that detailed conservation related effects management/compensation – are you able to share these with us?

Kind regards,

Marie

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: [REDACTED]



Department of Conservation  
*Te Papa Atawhai*

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## Email correspondence 5

**From:** John Roberts  
**Sent:** Tuesday, 28 October 2025 10:57 am  
**To:** Matt Schmidt; Marie Payne; Meg Embleton-Muir  
**Cc:** Charlie Sklenar; Pene Williams; Carl Jones  
**Subject:** Further feedback - Santana proposal for replacement CIT access through the Bendigo Historic Reserve  
**Attachments:** CIT feedback - JR.docx

Thanks Matt – changes made as below, new version attached.

Hi Marie - have tickled this up with Matts review. Meg is away this week – the references I make to visitor things are direct cut and pastes from her email - so I think we should take this feedback as done and ready to go to Santana.

However, I see in your latest from s9(2)(a) at Santana:

### **Come-In-Time Concession Area**

*A concession (permit) for activities occurring on public conservation land within the Bendigo Historic Reserve as follows:*

- *The replacement of the existing walking track to the Come-in-Time Battery via a new marked route west of the battery location (and corresponding closure of the existing short walking track between Thomson Gorge Road and the battery). This route will be comprised of marker poles and / or small-scale trail markers to guide walkers and will include the installation of a welcome / information sign at **the start of the track at Blue Mines Road**; and*
- *Any incidental vegetation clearance (including briar) using hand tools only to enable the route.*

So our attempt at achieving a good outcome here, ahead of them applying at least, may be wasted – but we can only try.

JR

Changes made in the new version attached:

Para 9 – added the bit in red

*This feedback has described the following:*

- *Alternative options to replace access to the CIT have do not appear to have been considered by Santana, including what appear to be obvious options on the neighbouring Bendigo Station lands immediately to the north that that are shorter, could be made to a higher track standard more suited to the traditional CIT user and with less adverse effects on the historic and recreational values of the Bendigo Historic Reserve; **or via Bendigo Creek from Logantown***

Added a new para 13:

13. *Another option is via Bendigo Creek from Logantown*

Old para 19 deleted this bit:

The DOC website refers to deep/open mine shafts and unmarked hazards off-track in this reserve. This means off-track access through the reserve is not something DOC could promote to all visitors.

Changes to the following paragraphs (additions in red) :

23. The HSE considerations and implications of promoting a route through here *(deleted - eg from old mineshafts)* would need to be very well considered and implemented.
24. It appears that there may be alternatives largely off pcl to what is proposed, although slightly longer than the current walking access to the CIT. *A track from Logantown to the CIT via Bendigo Creek has similarly not been considered.*
25. Well-constructed, *these* would *better* retain access to the stamper for the existing type of user who visits it now, rather than reducing it down to only those with backcountry off-track skills and experience
26. That Santana explore alternative replacement CIT access with Bendigo Station, *or via Bendigo Creek* and revise their concession proposal

---

**From:** Matt Schmidt <mschmidt@doc.govt.nz>

**Sent:** Tuesday, 28 October 2025 9:04 am

**To:** John Roberts <jroberts@doc.govt.nz>; Marie Payne <mpayne@doc.govt.nz>; Meg Embleton-Muir <memuir@doc.govt.nz>

**Cc:** Charlie Sklenar <csklenar@doc.govt.nz>; Pene Williams <pwilliams@doc.govt.nz>; Carl Jones <cajones@doc.govt.nz>

**Subject:** RE: Further feedback - Santana proposal for replacement CIT access through the Bendigo Historic Reserve

Morena JR

I have had a read.

Paragraph 19 is not accurate. The mines shafts are around the Welshtown area where the DOC walking tracks to visit these batteries are. A track is possible up Bendigo Creek from Logantown to the CIT as this creek's history is tied up with slicing from ca. 1863 onwards so is safe. This is important as by saying there is a risk of mine shafts here implies there is no alternative but to have a track to CIT off Thomsons Rd or around a hillside above Bendigo Creek. You just need to walk up the creek to gate to CIT.

Bendigo Creek is mainly hampered by vegetation, so a polled track is the best alternative to gate to the CIT once some veg is cleared. Near CIT when you walk past the Alpha Battery etc, the drives are on the hillside and accessed by old pack tracks so are quite obvious.

Na

Matt



Dr Matthew Schmidt  
Senior Heritage Advisor | Kaitohu Matua Taonga Tuku Iho  
**Department of Conservation | Te Papa Atawhai**  
Ōtepoti | Dunedin Office, Level 1, John Wickliffe House, 265 Princes Street, Dunedin  
Ph. s9(2)(a) | Email [mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz) | doc.govt.nz

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International Correspondent for the Asia-Pacific Cultural Centre for UNESCO

---

**From:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>  
**Sent:** Friday, 24 October 2025 4:47 pm  
**To:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>; Matt Schmidt <[mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz)>; Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>  
**Cc:** Charlie Sklenar <[csklenar@doc.govt.nz](mailto:csklenar@doc.govt.nz)>; Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; Carl Jones <[cajones@doc.govt.nz](mailto:cajones@doc.govt.nz)>  
**Subject:** Further feedback - Santana proposal for replacement CIT access through the Bendigo Historic Reserve

Hi Marie -see attached.

A little rough around the edges to get this to you by the COP today, and consequently it has not had a review by Matt or Meg.

You may not be able to, but it would be good if you could hold off providing this to Santana until Matt/Meg have had a look – eg. early next week (although I think Meg is away on leave for another week – but my rec comments are taken from her email).

I have purposefully not gone too far into the detail of the alternative access, as not our place to do so – have more just pointed them in the general direction.

Charlie/Pene/Carl – FYI

JR



**Department of Conservation**  
*Te Papa Atawhai*

**Date:** 24 October 2025

**To:** Marie Payne – Programme Lead, Fast Track Applications

**From:** John Roberts, Statutory Manager, SSI Region

**Purpose:** Additional pre-application feedback re-Santana Minerals proposed concession application for the replacement of public access to the Come In Time Battery, Bendigo Historic Reserve.

**Context**

1. The Come in Time Battery (CIT) is an easily accessed example of a stamper battery, something that is not able to be appreciated by the public elsewhere in the Bendigo Historic Reserve.
2. It is well restored and maintained and has good interpretation on site. Part of its value is that it is able to continue to be appreciated by the public, including by the current user group.



3. Santana Minerals have provided DOC with a draft concession application that - because of the proposed closure of the Thomsons Gorge Road to allow for mining operations - would replace public access to the CIT with an approximately 4km public walking 'route' across the Bendigo Historic Reserve from the Welshtown area to the CIT.
4. Santana seek a ten-year term.

---

<sup>1</sup> [Discover the Bendigo area](#) [Come in Time Battery: Bendigo area, Otago region](#)

5. See Figure 1, taken from the Santana draft application



Figure 1

6. The intent of maintaining public access to the CIT is welcome.
7. Access to the CIT is currently an approximately 300m or 10-minute easy walk from the carpark on the side of the public Thomsons Gorge Road.
8. DOC have previously provided feedback in both written form<sup>2</sup> and again in person to Santana on the 10<sup>th</sup> October.
9. This feedback has described the following:
- Alternative options to replace access to the CIT have do not appear to have been considered by Santana, including what appear to be obvious options on the neighbouring Bendigo Station lands immediately to the north that that are shorter, could be made to a higher track standard more suited to the traditional CIT user and with less adverse effects on the historic and recreational values of the Bendigo Historic Reserve; or via Bendigo Creek from Logantown.
  - s17U(4) of the Conservation Act<sup>3</sup> requires alternatives to be considered:

<sup>2</sup>  [PDF's sent to applicant](#)

<sup>3</sup> See s17U of the Conservation Act [Conservation Act 1987 No 65 \(as at 21 August 2025\), Public Act 17U Matters to be considered by Minister – New Zealand Legislation](#)

*The Minister shall not grant any application for a concession to build a structure or facility, or to extend or add to an existing structure or facility, where he or she is satisfied that the activity—*

*(a) could reasonably be undertaken in another location that—*

*(i) is outside the conservation area to which the application relates; or*

*(ii) is in another conservation area or in another part of the conservation area to which the application relates, where the potential adverse effects would be significantly less;*

- s17U(3) of the Conservation Act requires the activity to be consistent with the purposes for which the land is held. In this case<sup>4</sup>:

*protecting and preserving in perpetuity such places, objects, and natural features, and such things thereon or therein contained as are of historic, archaeological, cultural, educational, and other special interest.*

- These purposes appear not to have been considered
- No consideration has been given to adverse effects on biodiversity values through construction and use of the route – another consideration under s17U of the Conservation Act.
- No consideration has been given for ongoing maintenance beyond a ten-year term for this route that would presumably be ‘gifted’ to DOC to maintain and administer over the long term.
- No consideration has been given to the adverse effects on recreational values of replacing an easy 10-minute walk with an approximately 4km (approx 1 hour) route across the Bendigo Historic Reserve to the dominant current user group, nor any HSE considerations (eg old mineshafts).

#### **Site visit and further feedback**

10. On the 14 October Meg Embleton-Muir (Senior Visitor Advisor) and I visited the CIT via Thomsons Gorge Road and then the Welshtown area at the other end of the Bendigo Historic Reserve.
11. This was to better understand if the previous views expressed to Santana that a shorter alternative route - largely off pcl through an existing Bendigo Station road and Bendigo Station lands - was accurate.
12. While this site visit stayed on public road and public conservation lands, looking to the lands beyond supported the previous view that there is an obvious alternative that is shorter, for the most part off pcl; and in large measure is there already via a road. Where that road adjoins the Thomsons Gorge Road there is already a small, formed carpark. Multiple options exist

<sup>4</sup> [Conservation Act 1987 No 65 \(as at 21 August 2025\)](#), [Public Act 17U Matters to be considered by Minister – New Zealand Legislation](#) [Reserves Act 1977 No 66 \(as at 05 April 2025\)](#), [Public Act 18 Historic reserves – New Zealand Legislation](#)

before reaching this intersection with the Thomsons Gorge Road where a carpark could be formed and a well-constructed track branch off, with only a small part needed through the reserve.

13. Another option is via Bendigo Creek from Logantown

## Discussion

14. The standard of the track DOC provides is tied to the type of visitor experience DOC is offering, the type of hazards at site, and the skills and experience required by visitors to navigate those safely. This management approach is outlined in DOC's visitor safety SOP and is tied to our statutory obligations for visitor safety. In short, we need to ensure the experiences we provide and promote are clearly aligned to an agreed standard for different types of visitors with different levels of skill and risk appetite.
15. The CIT experience is provided for people on a short, well-defined track.
16. As a comparison the 5hr Kanuka Track (on the western side of the reserve) is managed as an [Advanced tramping track](#), which means the experience is mostly unformed track, may be rough and steep, provided for people with moderate to high fitness and remote/backcountry skills.
17. This is similar to what is proposed by Santana as a replacement access to the CIT.
18. There is adequate provision of this type of recreation activity in the reserve already on the Kanuka track, nor does it provide for the existing CIT user type.
19. From a visitor access perspective, DOC would want to see alternative access to the CIT to be comparable to that which is provided now, to ensure that those users who currently access it continue to have access within their skill-set.
20. If implemented, the Santana proposal would limit DOC promotion of the CIT to only visitors with a high level of backcountry experience and skill. This would reduce the opportunity for less experienced visitors to connect with the stamper heritage experience, possibly forever if the original access is not reinstated.

## Conclusions

21. Another backcountry track/route through the Bendigo Historic Reserve would not compliment or fill a gap in the range of recreation opportunities here, nor would it meet the expectations or skill-set of current CIT users.
22. To properly plan for a 4km route from Welshtown-CIT through the historic fabric of the reserve is likely to be complex from a heritage planning and implementation context.
23. The HSE considerations and implications of promoting a route through here would need to be very well considered and implemented.
24. It appears that there may be alternatives largely off pcl to what is proposed, although slightly longer than the current walking access to the CIT. A track from Logantown to the CIT via Bendigo Creek has similarly not been considered.
25. Well-constructed, these would better retain access to the stamper for the existing type of user who visits it now, rather than reducing it down to only those with backcountry off-track skills and experience

## Recommendations

26. That Santana explore alternative replacement CIT access with Bendigo Station, or via Bendigo Creek and revise their concession proposal
27. That the original access (as it is now from the Thomsons Gorge Road) be restored at the end of the life of the mine.

## Email correspondence 7

**From:** Pene Williams  
**Sent:** Tuesday, 28 October 2025 8:51 am  
**To:** Marie Payne; John Roberts; Dean van Mierlo  
**Cc:** Carl Jones; Marine Richarson; Darcy Liddell; Liz Williams  
**Subject:** RE: DOC updated documents request

Ata mārie koutou,

Thanks for this Marie.

s9(2)(h)

Kind regards/ Kā mihi,  
Pene

---

**From:** Marie Payne <mpayne@doc.govt.nz>  
**Sent:** Tuesday, 28 October 2025 8:07 am  
**To:** John Roberts <jroberts@doc.govt.nz>; Pene Williams <pwilliams@doc.govt.nz>; Dean van Mierlo <dean@environmentalbarrister.co.nz>  
**Cc:** Carl Jones <cajones@doc.govt.nz>; Marine Richarson <mricharson@doc.govt.nz>; Darcy Liddell <dliddell@doc.govt.nz>; Liz Williams <lwilliams@doc.govt.nz>  
**Subject:** FW: DOC updated documents request

Hi all,

I asked Satana to clarify which approvals they will be applying for (as they have added things in recently) below is the most recent email. I am using this to plan the teams resources for completeness (albeit – Darcy there is still not much detail on the Wildlife approvals front just FWF).

This is just an FYI no action required.

Kind regards,

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

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---

**From:** [s9(2)(a)]@mitchelldaysh.co.nz>

**Sent:** Friday, 24 October 2025 4:09 pm

**To:** Marie Payne <mpayne@doc.govt.nz>; [s9(2)(a)]@santanaminerals.com>

**Cc:** [s9(2)(a)]@santanaminerals.com>

**Subject:** RE: DOC updated documents request

Hi Marie

Sorry for the delay in getting back to you. We are, and continue to be, fully occupied trying to complete the Fast-track application documentation. However, as requested, the following sets out what MGL will be applying for within the administrative jurisdiction of the Department of Conservation.

### **Ardgour Rise Concession Area**

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 as follows:

- The establishment and maintenance of a portion of the realigned Thomson Gorge Road (i.e. Ardgour Rise) (largely within an existing easement providing for access) which consists of an approximately 4 m wide 4WD gravel track and any associated vegetation clearance, earthworks and construction activities (including erosion and sediment control measures). Included within the ambit of this concession is the realignment of the Chorus fibre optic cable (currently located within Thompson Gorge Road) within the Ardgour Rise alignment.

### **SH8 Concession Area**

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 as follows:

- Safety improvement upgrades within the existing road reserve at the SH8 / Ardgour Road intersection, which includes:
  - The formation of a 3.5 m wide right turn bay on SH8;
  - The reprofiling of the existing roadside safety barrier on Ardgour Road to follow the new road edge alignment;
  - The widening of the SH8 road carriageway and provision of 1.5 m wide road shoulders; and
  - New pavement marking and give way controls; and
- All associated construction activities including the establishment of construction laydown areas, erosion and sediment control measures, any necessary culverts and temporary traffic management measures.

### **Come-In-Time Concession Area**

A concession (permit) for activities occurring on public conservation land within the Bendigo Historic Reserve as follows:

- The replacement of the existing walking track to the Come-in-Time Battery via a new marked route west of the battery location (and corresponding closure of the existing short walking track between Thomson Gorge Road and the battery). This route will be comprised of marker poles and / or small-scale trail markers to guide walkers and

will include the installation of a welcome / information sign at the start of the track at Blue Mines Road; and

- Any incidental vegetation clearance (including briar) using hand tools only to enable the route.

### **Willow Concession Area**

A concession (permit) for activities occurring on public conservation land within the Bendigo Historic Reserve as follows:

- The management of crack willows along the Bendigo and Clearwater Creeks, which will include (with agreement of the Department of Conservation) the spraying of herbicide to kill willow trees, the progressive and / or partial removal of willow trees, and the partial replacement of cover with native vegetation;
- All necessary associated vegetation clearance and land disturbance activities (including the formation of access tracks) and replacement planting activities; and
- Monitoring activities within the first four years of spraying crack willows to monitor any regrowth of crack willow and native scrub along riparian zone.

### **Water Monitoring Concession Area**

A concession (permit) for activities occurring on public conservation land within the Bendigo Historic Reserve as follows:

- The establishment and use of a surface water flow meter (RS-03) in the bed of Bendigo Creek and the establishment and use (including drilling) of a groundwater monitoring bore (GW04) on adjacent land; and
- The use of an existing access track from Thomson Gorge Road within the Project Site to access the water monitoring infrastructure described above and undertake any necessary maintenance works.

### **Bendigo Conservation Covenant**

Partial uplift of the Bendigo Conservation Covenant (within part of Bendigo Station).

### **Wildlife Approval**

I'm still awaiting details on this from the Ecologists.

### **Freshwater Fisheries Regulations**

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- Various clean water diversion channels within the Rise and Shine Creek catchment - being diversions of the Rise and Shine Creek and associated tributaries around the SRX ELF, SRX Open Pit and RAS Open Pit.

Regards

s9(2)(a)

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**From:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Sent:** Wednesday, October 22, 2025 2:51 PM  
**To:** s9(2)(a) <[s9\(2\)\(a\)@santanaminerals.com](mailto:s9(2)(a)@santanaminerals.com)>  
**Cc:** s9(2)(a) <[s9\(2\)\(a\)@mitchelldaysh.co.nz](mailto:s9(2)(a)@mitchelldaysh.co.nz)>  
**Subject:** RE: DOC updated documents request

Hey both,

Just following this up.

In relation to the application report what I am looking for is a table which sets out specifically the different activities/approvals that will be sought through DOC as an administering agency e.g. concessions and then a list of the activities, wildlife same but including species, Freshwater fisheries etc...)

Kind regards,

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
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**From:** Marie Payne  
**Sent:** Tuesday, 21 October 2025 3:27 pm  
**To:** s9(2)(a) <[s9\(2\)\(a\)@santanaminerals.com](mailto:s9(2)(a)@santanaminerals.com)>

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Cc: s9(2)(a) [redacted] <[\[redacted\]@mitchelldaysh.co.nz](mailto:[redacted]@mitchelldaysh.co.nz)>

Subject: DOC updated documents request

Hey s9(2)(a) [redacted],

I was wondering if you had a more recent update of the BOGP Working Draft Substantive Application Report (the version we have is dated 29/08/2025) and I am thinking this one likely misses out a few approvals now?

During the previous presentation a few of the proposed management plans were referred to that detailed conservation related effects management/compensation – are you able to share these with us?

Kind regards,

Marie

**Marie Payne**

Programme Lead Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a) [redacted]



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*Te Papa Atawhai*

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## Email correspondence 8

**From:** Max Crowe <max@fieldlab.nz>  
**Sent:** Monday, 27 October 2025 10:09 am  
**To:** Sally Clarkson  
**Subject:** Re: Feedback summary for applicant - indigenous biodiversity

Kia ora Sally,  
I've reviewed the doc and made some minor changes, including addressing the points you raised. There are some tracked changes to tidy up, but other than that it is good to go.  
Ngā mihi,  
Max

FIELDLAB  
biodiversity restoration and monitoring specialist  
[max@fieldlab.nz](mailto:max@fieldlab.nz)

s9(2)(a)

On Fri, 24 Oct 2025, 14:03 Sally Clarkson, <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)> wrote:

Kia ora Max,

I hope you are well. I am preparing summary documents for each 'topic' with the aim of making it really clear how DOC sees the issues identified in the technical reviews (and obviously including your review). These documents will then be shared with the applicant.

I've compiled the key points from your assessment and request that you please review the document and make any amendments/corrections etc as you see fit. The document is saved at the link below. I have also attached a copy of the file as I am not sure you will be able to access it (it's saved in a different folder within the Bendigo channel, but I'll sort that next week).

 [DOC applicant feedback Indigenous Vegetation Oct 2025.docx](#)

Sorry, this is a bit last minute from my end but if you could review it asap that would be greatly appreciated. We are wanting to get the feedback to the applicant early next week so they have time to consider our feedback before lodging the application.

If you have any questions please let me know.

Thanks  
Sally

**Sally Clarkson**

Senior Planner Fast Track Applications  
Whare Kaupapa Atawhai | Conservation House

[18 Manners Street](#)

[Te Whanganui-a-Tara | Wellington](#)

*Please note: My work days are Mondays and Tuesdays*



Department of  
Conservation  
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**From:** Nicholas Dunn  
**Sent:** Friday, 24 October 2025 1:32 pm  
**To:** Sally Clarkson; Marie Payne  
**Subject:** RE: Feedback for applicant - Bendigo-Ophir

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi both,

I have provided some suggested amendments to the freshwater document as requested.

In terms of questions for ORC (in Marie's separate email), I note there is yet to be a meeting to discuss case strategy that I have been part of. In an RMA case this would typically involve legal, planning, relevant technical experts and District staff, and the decision maker. Knowing who the consultant is that ORC have engaged is also important, noting that the majority of likely people have already been engaged by the applicant. So, at this stage I don't have any questions/issues to put forward.

Regards

Nicholas

---

**From:** Sally Clarkson <sclarkson@doc.govt.nz>  
**Sent:** Wednesday, 22 October 2025 15:53  
**To:** Nicholas Dunn <ndunn@doc.govt.nz>; Mandy Tocher <mtocher@lizardexpertnz.co.nz>  
**Cc:** Marie Payne <mpayne@doc.govt.nz>  
**Subject:** Feedback for applicant - Bendigo-Ophir

Hi Nicholas and Mandy

We're currently templating all of our advisor feedback using a standardised format to ensure clarity. This approach helps us clearly articulate the impact or effect related to each comment, and outline what we believe the applicant needs to do in response.

Can you please review the templated response using track changes/comments and send it back ASAP. Ideally before the end of the week but if this isn't possible let us know.

Nicholas – the freshwater document can be accessed here:

 [DOC applicant feedback Freshwater Oct 2025.docx](#)

Mandy – the wildlife document is here (please see the comments I have left for you 😊):

 [DOC applicant feedback Wildlife Oct 2025.docx](#)

Let me know if you have any questions.

Many thanks.

Sally

**Sally Clarkson**

Senior Planner Fast Track Applications

Whare Kaupapa Atawhai | Conservation House

18 Manners Street

Te Whanganui-a-Tara | Wellington

*Please note: My work days are Mondays and Tuesdays*



Department of  
Conservation  
*Te Papa Atawhai*

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**From:** Simon Rodger  
**Sent:** Friday, 24 October 2025 8:29 am  
**To:** Mandy Tocher; Sally Clarkson  
**Cc:** Grace Masterton  
**Subject:** Re: Feedback for applicant - Bendigo-Ophir

Mōrena Mandy,

I've just granted you access at the folder level so you should be able to access document (and any others in the future, that are saved to this folder).

[@Sally Clarkson](#) fyi, Mandy only has limited access to the Bendigo-Ophir project files - I'm happy to talk you through how you can share easily with Mandy, or Grace can show you!

Ngā mihi nui,  
Simon

---

**From:** Mandy Tocher <mtocher@lizardexpertnz.co.nz>  
**Sent:** Thursday, 23 October 2025 3:31 pm  
**To:** Simon Rodger <srodger@doc.govt.nz>  
**Subject:** FW: Feedback for applicant - Bendigo-Ophir

Hi Simon – I cant access the link below from Sally and she doesn't work today – are you able to help? '  
Thanks  
Mandy



LizardExpertNZ

**Mandy Tocher**  
B.Sc., M.Sc. (Hon), Ph.D., M.Plan. (Dist).  
RMA hearings commissioner  
Herpetologist

s9(2)(a)

[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz) Email  
[www.lizardexpertnz.co.nz](http://www.lizardexpertnz.co.nz) Web  
[www.facebook.com/lizardexpertNZ](https://www.facebook.com/lizardexpertNZ) Follow Me



---

**From:** Sally Clarkson <sclarkson@doc.govt.nz>  
**Sent:** Wednesday, 22 October 2025 3:53 pm  
**To:** Nicholas Dunn <ndunn@doc.govt.nz>; Mandy Tocher <mtocher@lizardexpertnz.co.nz>

**Cc:** Marie Payne <mpayne@doc.govt.nz>  
**Subject:** Feedback for applicant - Bendigo-Ophir

Hi Nicholas and Mandy

We're currently templating all of our advisor feedback using a standardised format to ensure clarity. This approach helps us clearly articulate the impact or effect related to each comment, and outline what we believe the applicant needs to do in response.

Can you please review the templated response using track changes/comments and send it back ASAP. Ideally before the end of the week but if this isn't possible let us know.

Nicholas – the freshwater document can be accessed here:

 [DOC applicant feedback Freshwater Oct 2025.docx](#)

Mandy – the wildlife document is here (please see the comments I have left for you 😊):

 [DOC applicant feedback Wildlife Oct 2025.docx](#)

Let me know if you have any questions.

Many thanks.  
Sally

**Sally Clarkson**

Senior Planner Fast Track Applications  
Whare Kaupapa Atawhai | Conservation House  
18 Manners Street  
Te Whanganui-a-Tara | Wellington

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**From:** Mandy Tocher <mtocher@lizardexpertnz.co.nz>  
**Sent:** Thursday, 23 October 2025 8:36 pm  
**To:** Sally Clarkson; Nicholas Dunn  
**Cc:** Marie Payne  
**Subject:** RE: Feedback for applicant - Bendigo-Ophir

Hi Sally – I have now reviewed it and uploaded it back into the ecology folder – same file name with 'MTocher review comments'.

All the best  
Mandy



LizardExpertNZ

**Mandy Tocher**

*B.Sc., M.Sc. (Hon), Ph.D., M.Plan. (Dist).*  
*RMA hearings commissioner*

Herpetologist

s9(2)(a)

[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz) Email

[www.lizardexpertnz.co.nz](http://www.lizardexpertnz.co.nz) Web

[www.facebook.com/lizardexpertNZ](https://www.facebook.com/lizardexpertNZ) Follow Me



---

**From:** Sally Clarkson <sclarkson@doc.govt.nz>

**Sent:** Thursday, 23 October 2025 3:36 pm

**To:** Mandy Tocher <mtocher@lizardexpertnz.co.nz>; Nicholas Dunn <ndunn@doc.govt.nz>

**Cc:** Marie Payne <mpayne@doc.govt.nz>

**Subject:** RE: Feedback for applicant - Bendigo-Ophir

Hi Mandy

No worries. I have copied it (the wildlife feedback document) into the tech assessments folder (under the Ecology folder).

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+ New

Upload

Edit in grid view

Share

Copy link

All Documents

Pre lodgement > Draft reports provided by applicant and report summary > Ecology

Name



20250515\_BOGP\_Mammalian\_Pest\_Report\_v001.pdf



20250515\_BOGP\_Native\_Bat\_Survey\_Final\_v001.pdf



20250519\_BOGP\_Terrestrial\_Invertebrate\_Survey\_Final\_v001.pdf



2352 Matakanui avifauna values 8August2025.issued.pdf



2352 Matakanui lizard values 5August2025.issued.pdf



2352 Matakanui vegetation values 8August2025.issued.pdf



2352 Matakanui wetland values.8August2025.issued.pdf



DOC applicant feedback Wildlife Oct 2025.docx



Lizard Management Plan September 2025.pdf

Let me know if you need anything else.

Thanks  
Sally

**From:** Mandy Tocher <[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz)>

**Sent:** Thursday, 23 October 2025 3:30 pm

**To:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>; Nicholas Dunn <[ndunn@doc.govt.nz](mailto:ndunn@doc.govt.nz)>

**Cc:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Subject:** RE: Feedback for applicant - Bendigo-Ophir

Hi Sally – I cant access the link – but can still get into the technical assessments. Can you please put the file there?

Thanks  
Mandy

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LizardExpertNZ

**Mandy Tocher**

B.Sc., M.Sc. (Hon), Ph.D., M.Plan. (Dist).  
RMA hearings commissioner  
Herpetologist

s9(2)(a)

[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz) Email

[www.lizardexpertnz.co.nz](http://www.lizardexpertnz.co.nz) Web

[www.facebook.com/lizardexpertNZ](https://www.facebook.com/lizardexpertNZ) Follow Me



**From:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>

**Sent:** Wednesday, 22 October 2025 3:53 pm

**To:** Nicholas Dunn <[ndunn@doc.govt.nz](mailto:ndunn@doc.govt.nz)>; Mandy Tocher <[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz)>

**Cc:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Subject:** Feedback for applicant - Bendigo-Ophir

Hi Nicholas and Mandy

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Nicholas – the freshwater document can be accessed here:

 [DOC applicant feedback Freshwater Oct 2025.docx](#)

Mandy – the wildlife document is here (please see the comments I have left for you

😊):

 [DOC applicant feedback Wildlife Oct 2025.docx](#)

Let me know if you have any questions.

Many thanks.

Sally

**Sally Clarkson**

Senior Planner Fast Track Applications

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18 Manners Street  
Te Whanganui-a-Tara | Wellington  
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**From:** Marie Payne  
**Sent:** Thursday, 23 October 2025 6:19 pm  
**To:** Ben Bond  
**Cc:** Richard Preece; Elliott Dennett; Jenni Fitzgerald  
**Subject:** RE: Bendigo Timeframes

Hi Ben,

Thanks for the conversation earlier and the email below.

Given the scale and complexity of this approach the flexibility is appreciated and I will keep in touch with any further updates.

Any questions in the interim, please let me know.

Kind regards,

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Ben Bond <Ben.Bond@epa.govt.nz>  
**Sent:** Thursday, 23 October 2025 10:53 am  
**To:** Marie Payne <mpayne@doc.govt.nz>  
**Cc:** Richard Preece <Richard.Preece@epa.govt.nz>; Elliott Dennett <Elliott.Dennett@epa.govt.nz>  
**Subject:** Bendigo Timeframes

Hi Marie,

Thanks for your time on the phone today.

As discussed, given the size and complexity of this proposal, the EPA will be working to try and accommodate the agencies involved in the Section 46 completeness process.

To that end we will be assigning more staff to the project than is usual and will be endeavouring to get the comment and review requests out in good time to yourselves whilst still allowing ourselves enough time at the other end to deal with your comments when we receive them back from you. As I stated, we will be aiming (although I cannot promise!) to give you 7-8 days as you suggested had been the case for Waihi North.

We also spoke about the possibility of using your existing working relationship and cost recovery agreement with the applicants to gain access to parts of the application early to see if

you could get ahead so to speak on the approvals sought from a conservation perspective. We are supportive of this approach and if you do manage to arrange this please do let us know. We also spoke about the possibility of "drip feeding" feedback as information becomes available to you and whilst I wasn't able to confirm a preference for this approach, as I said, we will be discussing this project early next week at the EPA and I will be in touch regarding our preference.

Finally, thanks you for the informative conversation today, we will keep in touch and give as much forewarning to you as we can, and I do ask that if DOC hears anything pertinent to the proposal, please do reach out and let us know.

Kind Regards

Ben

Ben Bond (he/him)  
Team Leader Regulatory Processes, EEZ Consents

s9(2)(a)

The EPA supports flexible working. You might receive an email from me outside your usual working hours. Please respond at a time that works for you.



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**From:** Marie Payne  
**Sent:** Thursday, 23 October 2025 5:05 pm  
**To:** Warren Chinn  
**Cc:** Sally Clarkson  
**Subject:** RE: Invertebrates Bendigo FT application

Hey Warren,

Apologies for my delayed response on this and thanks for your patience.

With the feedback we are structuring it all in the same way just to make it really clear how we see the issues identified in your review will impact the application. Also if there was anything additional you wanted to add in following the workshop, given the issue raised and discussed.

 [Draft DOC applicant feedback Invertebrates Sept 2025.docx](#)

I've pulled all the key points out from your assessment (from my view but happy for you to add anything)...what I need now is for you to populate the other columns and review i.e. how does the issue you identified in your review impact the application and what do we think needs to be done about it. I really want to try and get this back to the applicant early next week as I think they are preparing to lodge very soon.

Happy to chat if you want to talk through.

Kind regards,

Marie

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



**Department of Conservation**  
*Te Papa Atawhai*

---

**From:** Warren Chinn <wchinn@doc.govt.nz>  
**Sent:** Friday, 3 October 2025 9:32 am

**To:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Subject:** Re: Invertebrates Bendigo FT application

Morning Marie,

So, on the back of yesterday's messages, what more, if anything, is required regarding invertebrate ecology for this mine application? In my opinion, the EPA should look carefully at the invertebrate issue - there are several threatened moths and (as s9(2)(a) points out) a re-discovered beetle and many other community-level matters of significance on the land.

But what is more disturbing, is the incompetence of the invertebrate report: In my view, it is insufficient to advance a decision due to its erratic and confused assessment of the invertebrate fauna.

Can we highlight that as part of our commentary?

Thanks  
Warren

---

**From:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Sent:** Thursday, 2 October 2025 13:21  
**To:** Warren Chinn <[wchinn@doc.govt.nz](mailto:wchinn@doc.govt.nz)>  
**Subject:** RE: Invertebrates Bendigo FT application

Thanks Warren, hopefully that comes through in the summary document.

Kind regards,

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Warren Chinn <[wchinn@doc.govt.nz](mailto:wchinn@doc.govt.nz)>  
**Sent:** Thursday, 2 October 2025 1:18 pm  
**To:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Subject:** Re: Invertebrates Bendigo FT application

Hi Marie, yes, that could be worth highlighting - along with several threatened moths .  
And the fact the applicant received an error ridden report. I'm away today - will get  
back soon. Warren :)

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---

**From:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Sent:** Thursday, October 2, 2025 9:59:40 AM  
**To:** Warren Chinn <[wchinn@doc.govt.nz](mailto:wchinn@doc.govt.nz)>  
**Subject:** RE: Invertebrates Bendigo FT application

Hey Warren,

Just following up on this one. Looking to send our feedback off to the applicant at the  
end of the week.

s9(2)(j)

Kind regards,

Marie

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Marie Burton  
**Sent:** Friday, 19 September 2025 4:30 pm  
**To:** Warren Chinn <[wchinn@doc.govt.nz](mailto:wchinn@doc.govt.nz)>  
**Subject:** Invertebrates Bendigo FT application

Hey Warren,

Thanks for providing your feedback on the Invertebrates material. It was an interesting  
read, particularly the use of graphs at towards the end.

I have tabulated what I understood to be the key issues/opportunities from the  
assessment as above, the next step is going to be really clearly articulating what key  
considerations this creates in terms of the FTAA application, how would these gaps

better inform their application, what does it mean if the gaps aren't filled (risk) an. I have had a really high-level go at this (from a layman's perspective) but would appreciate if you could:

- 1) Review the summary of your work above – i.e. focus is on the core facts
- 2) Add to the commentary column – e.g. as above what are the outcomes of these omissions?

 [Draft DOC applicant feedback Invertebrates Sept 2025.docx](#)

Happy to discuss this further with you first.

Kind regards,

Marie

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

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**From:** Marie Burton  
**Sent:** Monday, 22 September 2025 9:41 am  
**To:** Sally Clarkson  
**Subject:** FW: Invertebrates Bendigo FT application

Hey Sally,

Here is the example below.

Kind regards,

Marie

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Ataturangi*

---

**From:** Marie Burton  
**Sent:** Friday, 19 September 2025 4:30 pm  
**To:** Warren Chinn <wchinn@doc.govt.nz>  
**Subject:** Invertebrates Bendigo FT application

Hey Warren,

Thanks for providing your feedback on the Invertebrates material. It was an interesting read, particularly the use of graphs at towards the end.

I have tabulated what I understood to be the key issues/opportunities from the assessment as above, the next step is going to be really clearly articulating what key considerations this creates in terms of the FTAA application, how would these gaps better inform their application, what does it mean if the gaps aren't filled (risk) an. I have had a really high-level go at this (from a layman's perspective) but would appreciate if you could:

- 1) Review the summary of your work above – i.e. focus is on the core facts
- 2) Add to the commentary column – e.g. as above what are the outcomes of these omissions?

 [Draft DOC applicant feedback Invertebrates Sept 2025.docx](#)

Happy to discuss this further with you first.

Kind regards,

Marie

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

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**From:** Marie Payne  
**Sent:** Wednesday, 22 October 2025 3:58 pm  
**To:** s9(2)(a); Sally Clarkson  
**Subject:** RE: DOC updated documents request  
**Attachments:** Re: BOGP and DOC catch up

Hey s9(2)(a)

Looking for a break down of the conservation approvals sought to help inform our resourcing for when you lodge, just want to make sure we have a complete picture. It could be something like the table below – we have info on some of the concessions/covenant, but I am aware from the presentation a further concession is being added. Wildlife, we haven't received any draft application docs and Freshwater fisheries we have a list as attached.

I am happy to fill this out and you can just fill the gaps/if there are any?

Approval type	Activity	Detail	Species (wildlife approvals only)
<b>Concession</b>	Walking track	Establish a walking route to provide public access to the Come in Time Battery including any associated clearance of briar and other weed species to facilitate public walking access.	N/A
	Upgrade intersection		N/A
<b>Wildlife</b>	To catch, handle etc....		Kiwi
			Lizards
<b>Freshwater Fisheries</b>			
<b>Other approvals under the Conservation Act</b>	Revocation of a covenant	Revoke covenant across the project site	N/A
			N/A

Kind regards,

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



**Department of Conservation**  
*Te Papa Atawhai*

---

**From:** s9(2)(a)@santanaminerals.com>  
**Sent:** Wednesday, 22 October 2025 3:35 pm  
**To:** Marie Payne <mpayne@doc.govt.nz>; s9(2)(a)@santanaminerals.com>; Sally Clarkson <sclarkson@doc.govt.nz>  
**Subject:** Re: DOC updated documents request

Hi Marie,

Thanks for your message.

Just to clarify, what do you want in a list?

We're still working through the details of the application and don't yet have a confirmed submission date. I'll be sure to keep you updated as things progress.

Please let me know if you need anything further in the meantime.

Kind regards,

s9(2)(a)

Santana Minerals | Cromwell, NZ

s9(2)(a)

| W: [www.santanaminerals.com](http://www.santanaminerals.com)



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**From:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Sent:** Wednesday, October 22, 2025 3:25 PM  
**To:** s9(2)(a) <[REDACTED]@santanaminerals.com>; Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Cc:** s9(2)(a) <[REDACTED]@santanaminerals.com>  
**Subject:** RE: DOC updated documents request

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Hi s9(2)(a) <[REDACTED]>

Thanks for getting back to me.....I suppose at this point we are just seeking a list (which you may just be able to copy and paste out of a report?)

If not, we will just use the info we have to date, did you have any update on lodgement timeframe.

Kind regards,

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile s9(2)(a) <[REDACTED]>



**Department of Conservation**  
*Te Papa Atawhai*

---

**From:** s9(2)(a) <[REDACTED]@santanaminerals.com>  
**Sent:** Wednesday, 22 October 2025 3:21 pm  
**To:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>; Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Cc:** s9(2)(a) <[REDACTED]@santanaminerals.com>  
**Subject:** Re: DOC updated documents request

Hey Marie,

Unfortunately, we are unable to release anything further in draft format, due to the risk of OIA requests and draft reports being made public. However, we can send these to you as soon as they are finalised. I will get in touch with you again as soon as that happens.

Can you please also cc s9(2)(a) into any future correspondence.

Kind regards,

s9(2)(a)

---

**From:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Sent:** Wednesday, October 22, 2025 2:50 PM  
**To:** s9(2)(a) <[s9\(2\)\(a\)@santanaminerals.com>  
\*\*Cc:\*\* s9\(2\)\(a\) <\[s9\\(2\\)\\(a\\)@mitchelldaysh.co.nz>  
\\*\\*Subject:\\*\\* RE: DOC updated documents request\]\(mailto:span style=\)](mailto:span style=)

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Hey both,

Just following this up.

In relation to the application report what I am looking for is a table which sets out specifically the different activities/approvals that will be sought through DOC as an administering agency e.g. concessions and then a list of the activities, wildlife same but including species, Freshwater fisheries etc...)

Kind regards,

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



**Department of Conservation**  
*Te Papa Atawhai*

---

**From:** Marie Payne  
**Sent:** Tuesday, 21 October 2025 3:27 pm  
**To:** s9(2)(a) <[s9\(2\)\(a\)@santanaminerals.com>](mailto:span style=)

Cc: s9(2)(a) [redacted] <[s9\(2\)\(a\)@mitchelldaysh.co.nz](mailto:s9(2)(a)@mitchelldaysh.co.nz)>

Subject: DOC updated documents request

Hey s9(2)(a) [redacted]

I was wondering if you had a more recent update of the BOGP Working Draft Substantive Application Report (the version we have is dated 29/08/2025) and I am thinking this one likely misses out a few approvals now?

During the previous presentation a few of the proposed management plans were referred to that detailed conservation related effects management/compensation – are you able to share these with us?

Kind regards,

Marie

**Marie Payne**

Programme Lead Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a) [redacted]



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*Te Papa Atawhai*

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**From:** s9(2)(a)@santanaminerals.com>  
**Sent:** Wednesday, 24 September 2025 2:56 pm  
**To:** Marie Payne  
**Cc:** Sally Clarkson; Jenni Fitzgerald; John Roberts  
**Subject:** Re: BOGP and DOC catch up

Hi Marie,

Just coming back to you on the freshwater fisheries approvals- we will be applying for a dispensation of the necessary approvals (under regulation 43), as per the information below.

Hope this helps to clarify,

Regards.

s9(2)(a)

### **Freshwater Fisheries Regulations 1983**

Approvals required for the BOGP that would otherwise be required under the Freshwater Fisheries Regulations are:

- A dispensation under Regulation 43 (damming or diverting a watercourse) of the Freshwater Fisheries Regulations for:
  - The Shepherds CWDC - being the realignment of Shepherds Creek around the Shepherds Service Corridor and Processing Plant Area within the Shepherds Valley Site;
  - Various clean water diversion channels with the Shepherds Creek catchment - being the diversions of the Shepherds Creek and associated tributaries around the TSF, Shepherds ELF and other mine components; and
  - Various clean water diversion channels within the Rise and Shine Creek catchment - being diversions of the Rise and Shine Creek and associated tributaries around the SRX ELF, SRX Open Pit and RAS Open Pit.
- Approvals in respect of complex freshwater fisheries activities in relation to Regulation 42 (culverts).

It is noted that Waterways (2025) confirms no watercourses within the Project Site provide habitat for any fish species. This is due to the presence of several barriers to upstream and downstream fish passage in the Shepherds Creek

catchment, which include the approximately 3 km lower ephemeral reach of Shepherds Creek which flows very infrequently and the existing water abstraction structure within Shepherds Creek. In addition, while Waterways (2025) identified localised populations of kōaro and brown trout within the lower Bendigo Creek – which is located adjacent to the Project Site and downstream of Rise and Shine Creek - an upstream waterfall between this habitat and the Project Site provides a barrier to fish passage.

Considering the above, it is considered that there is no requirement for these the various diversion structures and culverts to include a fish facility, and a dispensation is sought accordingly.

However, as discussed in Section 3.17 of this report, MGL proposes to install a culvert in the bed of Rise and Shine Creek within the Project Site. Because the specific location, size and design of this culvert cannot be determined until detailed design, the placement and use of the culvert in this creek cannot be demonstrated to meet the permitted conditions for culverts in the NES Freshwater and consent is therefore required. While fish passage has been demonstrated above to not be a relevant consideration (due to the absence of any fish), detailed culvert design (in accordance with the relevant information requirements in the NES Freshwater) will be provided following the installation of the culvert to ensure baseline flows can continue to be provided.

It is noted that approvals in respect of standard freshwater fisheries activities are included in consideration of the relevant approvals relating to RMA consents for structures in the beds of lakes / rivers (RMA section 13) and damming and diversion of water (RMA section 14).

---

**From:** Marie Burton <mpayne@doc.govt.nz>

**Sent:** Monday, September 22, 2025 5:33 PM

**To:** s9(2)(a) @santanaminerals.com>

**Cc:** Sally Clarkson <sclarkson@doc.govt.nz>; Jenni Fitzgerald <jefitzgerald@doc.govt.nz>; John Roberts <jroberts@doc.govt.nz>

**Subject:** RE: BOGP and DOC catch up

**Caution:** This Email is from an EXTERNAL source. Please exercise caution. DO NOT open attachments or click on links from unknown senders or unexpected email.

Hey s9(2)(a),

**DOC commentary on assessments** - As discussed, we are working on getting written commentary to you on Heritage, Invertebrates, Lizards and Avifauna and this should be over the next 1-2 weeks (if any management plans can be shared in the interim, please send them through).

**Freshwater fisheries approvals** - I am keen to understand if freshwater fisheries approvals will be sought and if you can provide any further information on this (including scale), so we can line up the relevant expertise from our side.

**Concessions workshop** - Monday 9<sup>th</sup> Oct – 3 – 4pm or October 10<sup>th</sup> 10-12pm (longer session may be preferable)

Role	Name	Contact email
Senior Permissions Advisor	Carl Jones	<a href="mailto:cajones@doc.govt.nz">cajones@doc.govt.nz</a>
District Ops – Statutory manager	John Roberts	<a href="mailto:jroberts@doc.govt.nz">jroberts@doc.govt.nz</a>
Recreation advisor	Meg Embleton Muir	<a href="mailto:memuir@doc.govt.nz">memuir@doc.govt.nz</a>
Fast track project lead	Marie Payne	<a href="mailto:mpayne@doc.govt.nz">mpayne@doc.govt.nz</a>
Solicitor	Pene Williams	<a href="mailto:pwilliams@doc.govt.nz">pwilliams@doc.govt.nz</a>
FT Manager (optional)	Jenni Fitzgerald	<a href="mailto:jefitzgerald@doc.govt.nz">jefitzgerald@doc.govt.nz</a>

**Lizards workshop** – Wens 1<sup>st</sup> Oct - 1-4 pm October availability

Role	Name	Contact email
Wildlife Permissions advisor (optional)	Darcy Liddell	<a href="mailto:dliddell@doc.govt.nz">dliddell@doc.govt.nz</a>
District Ops – Statutory manager	John Roberts	<a href="mailto:jroberts@doc.govt.nz">jroberts@doc.govt.nz</a>
Lizard SME	Mandy Toucher	<a href="mailto:mtocher@lizardexpertnz.co.nz">mtocher@lizardexpertnz.co.nz</a>
Fast track project lead	Marie Payne	<a href="mailto:mpayne@doc.govt.nz">mpayne@doc.govt.nz</a>
Solicitor	Pene Williams	<a href="mailto:pwilliams@doc.govt.nz">pwilliams@doc.govt.nz</a>
BHV principal advisor (optional)	Laurence Barea	<a href="mailto:lbarea@doc.govt.nz">lbarea@doc.govt.nz</a>

**Invoicing** – DOC is moving to monthly invoicing for FT project costs (the first invoice will capture all costs from Feb 2025), this may not be sent until I am back but in the event it comes before, please be aware of this transition.

If you have any questions whilst I am away, please contact John/Sally (available Mon-Tues) – or with any urgent matter Jenni Fitzgerald.

Kind regards,

Marie

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

**From:** s9(2)(a)@santanaminerals.com>

**Sent:** Monday, 22 September 2025 3:53 pm

**To:** Marie Burton <mpayne@doc.govt.nz>

**Subject:** BOGP and DOC catch up

Hi Marie,

Thanks for your time this afternoon and organising everyone on your end.

Following on from that- we would like to organise the next meeting to discuss concessions, and also a Lizard workshop with Mandy, as suggested by the ecologists in the room today.

We think the workshop would probably be best done in person; however, I am not sure where everyone is based, so teams may be preferable for you?

Can you please let me know some potential dates for

1. Concessions discussion
2. Lizard Workshop

Kind regards,

s9(2)(a)

Santana Minerals | Cromwell, NZ

s9(2)(a)

| W: [www.santanaminerals.com](http://www.santanaminerals.com)



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**From:** Marie Payne  
**Sent:** Wednesday, 22 October 2025 3:45 pm  
**To:** Sally Clarkson  
**Subject:** RE: Bengio-Ophir land disturbance information

That would be great 😊

I suppose a cover email along the lines of .....

*We're currently templating all of our feedback using a standardised format to ensure clarity. This approach helps us clearly articulate the impact or effect related to each comment, and outline what we believe needs to be done in response. Can you please review the templated response using track changes/comments and send it back ASAP. Ideally before the end of the week but if this isn't possible let us know.*

Thanks Sally

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Sally Clarkson <sclarkson@doc.govt.nz>  
**Sent:** Wednesday, 22 October 2025 3:02 pm  
**To:** Marie Payne <mpayne@doc.govt.nz>  
**Subject:** RE: Bengio-Ophir land disturbance information

No but I can/will?

---

**From:** Marie Payne <mpayne@doc.govt.nz>  
**Sent:** Wednesday, 22 October 2025 2:33 pm  
**To:** Sally Clarkson <sclarkson@doc.govt.nz>  
**Subject:** RE: Bengio-Ophir land disturbance information

Hey Sally

With your feedback summaries – the ones we intend to send to the applicant, have you sent the completed ones on to the specific advisors?

Kind regards,

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



**Department of Conservation**  
*Te Papa Atawhai*

---

**From:** Sally Clarkson <sclarkson@doc.govt.nz>

**Sent:** Wednesday, 22 October 2025 2:18 pm

**To:** DLVC\_FIELDLAB - MAX M L CROWE <max@fieldlab.nz>; Nicholas Dunn <ndunn@doc.govt.nz>; Mandy Tocher <mtocher@lizardexpertnz.co.nz>; Rogan Colbourne <rcolbourne@doc.govt.nz>; Warren Chinn <wchinn@doc.govt.nz>; Marine Richardson <mricharson@doc.govt.nz>; Carl Jones <cajones@doc.govt.nz>; Darcy Liddell <dliddell@doc.govt.nz>; Liz Williams <lwilliams@doc.govt.nz>; John Roberts <jroberts@doc.govt.nz>; Matt Schmidt <mschmidt@doc.govt.nz>

**Cc:** Marie Payne <mpayne@doc.govt.nz>

**Subject:** Bengio-Ophir land disturbance information

Hi everyone

I understand some of you have requested a breakdown of intended stages of land disturbance for the proposed mining operations. I requested this from the applicant and have received an updated Project Description which at section 3.2.4 outlines an indicative project timeframe. It has been uploaded to the Workflow tool and can be accessed at the link below:

 [Section 3 - BBOGP Working Draft Substantive Application Report - Project Description \(24 September 2025\).pdf](#)

I hope this is helpful but let me know if anything additional is required.

Regards  
Sally

**Sally Clarkson**

Senior Planner Fast Track Applications

Whare Kaupapa Atawhai | Conservation House

18 Manners Street

Te Whanganui-a-Tara | Wellington

*Please note: My work days are Mondays and Tuesdays*

**From:** Marie Payne  
**Sent:** Wednesday, 22 October 2025 2:36 pm  
**To:** Sally Clarkson; DLVC\_FIELDLAB - MAX M L CROWE; Nicholas Dunn; Mandy Tocher; Rogan Colbourne; Warren Chinn; Marine Richarson; Carl Jones; Darcy Liddell; Liz Williams; John Roberts; Matt Schmidt  
**Subject:** RE: Bengio-Ophir land disturbance information

Hi all,

Also just wanted to note we had requested a more succinct break down of land disturbance and timeframes but have just been referred back to this document so no further information likely at this point.

Kind regards,

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Sally Clarkson <sclarkson@doc.govt.nz>  
**Sent:** Wednesday, 22 October 2025 2:18 pm  
**To:** DLVC\_FIELDLAB - MAX M L CROWE <max@fieldlab.nz>; Nicholas Dunn <ndunn@doc.govt.nz>; Mandy Tocher <mtocher@lizardexpertnz.co.nz>; Rogan Colbourne <rcolbourne@doc.govt.nz>; Warren Chinn <wchinn@doc.govt.nz>; Marine Richarson <mricharson@doc.govt.nz>; Carl Jones <cajones@doc.govt.nz>; Darcy Liddell <dliddell@doc.govt.nz>; Liz Williams <lwilliams@doc.govt.nz>; John Roberts <jroberts@doc.govt.nz>; Matt Schmidt <mschmidt@doc.govt.nz>  
**Cc:** Marie Payne <mpayne@doc.govt.nz>  
**Subject:** Bengio-Ophir land disturbance information

Hi everyone

I understand some of you have requested a breakdown of intended stages of land disturbance for the proposed mining operations. I requested this from the applicant and have received an updated Project Description which at section 3.2.4 outlines an indicative project timeframe. It has been uploaded to the Workflow tool and can be accessed at the link below:

 [Section 3 - BBOGP Working Draft Substantive Application Report - Project Description \(24 September 2025\).pdf](#)

I hope this is helpful but let me know if anything additional is required.

Regards  
Sally

**Sally Clarkson**

Senior Planner Fast Track Applications

Whare Kaupapa Atawhai | Conservation House

18 Manners Street

Te Whanganui-a-Tara | Wellington

*Please note: My work days are Mondays and Tuesdays*



Department of  
Conservation  
*Te Papa Atawhai*

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**From:** Marie Payne  
**Sent:** Tuesday, 21 October 2025 3:00 pm  
**To:** John Roberts  
**Subject:** RE: Santana - Come in Time Battery Access and removing willows in Bendigo Creek

Hey JR,

I'll give you a call tomorrow on this one.

Kind regards,

Marie

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanqanui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** John Roberts <jroberts@doc.govt.nz>  
**Sent:** Monday, 20 October 2025 10:04 am  
**To:** Marie Payne <mpayne@doc.govt.nz>  
**Subject:** Santana - Come in Time Battery Access and removing willows in Bendigo Creek

Morning Marie – given the 2 items below are important to us directly and seem relatively simple to achieve I wonder if it's worth me just calling s9(2)(a) their consultant this week and having a chat?

Would be especially good if we could steer their concession application for the new track off the pcl and onto the Bendigo lands as below – this would be a much better outcome for the public

?

JR

---

**From:** John Roberts  
**Sent:** Wednesday, 15 October 2025 3:58 pm  
**To:** Marie Payne <mpayne@doc.govt.nz>; Matt Schmidt <mschmidt@doc.govt.nz>; Meg Embleton-Muir <memuir@doc.govt.nz>; Carl Jones <cajones@doc.govt.nz>  
**Cc:** Pene Williams <pwilliams@doc.govt.nz>; Charlie Sklenar <csklenar@doc.govt.nz>; Tracey Grose

<tgrose@doc.govt.nz>

**Subject:** Santana - Come in Time Battery Access and removing willows in Bendigo Creek

Hi all – Meg and I had a most helpful site visit yesterday to:

- the Come in Time Battery via the existing access from the TG road; and
- the Welshtown end of the Bendigo Historic Reserve (where the proposed Santana track would start)
- Bendigo Creek wrt willow control

1. CIT

The CIT is an easily accessed example of a stamper battery, something that is not otherwise able to be appreciated by the public elsewhere in the reserve (the one at the Welshtown end of the reserve has long gone). It appears to my lay eye to be well restored and maintained and has good interpretation on site. Part of its historic values has to be that it is able to continue to be appreciated by the public, especially by a user group that does not involve backcountry-type skills to get there.

In that context we should acknowledge that Santana want to do something to maintain access to the CIT – this is a good thing

However, Megs rec-user views are made clear in the attached – from the user group and the spectrum of opportunities already in the reserve, a new backcountry standard track (or possibly 'route') from Welshtown to the CIT is not something we could support. Nor do Matts views wrt heritage values support this Welshtown-CIT track through the fabric there – and to achieve it would be tortuous from a planning and implementation context, and possibly the HSE wrt mine-shafts.

Although we stayed on the public TG road and CIT access track, looking to the lands beyond supports my previous desktop exercise that there is an obvious alternative that is shorter, for the most part off pcl; and in large measure is there already. See attached pdf. In all ways this seems a far better option than what is proposed; and could be built to a standard (and length) that would much better suit the sort of people that want to see the CIT. For the most part it just needs an easement from Bendigo, rather than a concession from us.

s9(2)(j)

## 2. Willow removal

- The extent of willows was obvious - it is not small job. They are a tangled web across and variously intertwined across the creek, plus noting there will probably be some historic features uncovered
- But there will be expertise (ORC?) with doing this sort of work – a mix of poisoning, felling, removal in places etc ; and managing the discovery of historic fabric can likewise be managed as they go, if not ahead of works.

Given the timeframe we have with Santana ahead of lodging, my current thinking is that we could potentially support the FT panel granting of a concession for this work (eg. a licence) where it specifies the *Outcomes* we require, but that leaves an Implementation Plan as something to be developed with DOC as a condition of the concession. That way we don't have to go back and forth about the methods (or cost) at this time – all we do is work up the Outcomes the concession has to deliver on – how that is achieved comes in an implementation phase. If they don't achieve the Outcomes then they keep going. I agree that a concession is a bit of an odd way to authorise this type of work - perhaps it may come down to being a function of what tools the FT Panel will have and can actually apply. Plus how to enforce – perhaps the granting of any wider FT approval requires (how?) that the Outcomes of this concession are met.

This is not too far from their current concession proposal (see attached) but that is currently missing Outcomes. Think we need a bio/weed control person to help here with what we want/expect. It's a good opportunity to restore the biodiversity here, so we shouldn't pass it up.

- If we are to meet Santana wrt CIT, we should talk through this one a bit more and see if they can give their concession application meaning by having Outcomes specified - is it 100% clearance? What does 'clearance' mean? Does it involve follow up control after 5 years? 10 years? 20 years? The high-level stuff that the conditions of any concession should specify, with detail (implementation plan/ annual works plans) to follow once a concession granted. And how to enforce that it actually happens and doesn't dissolve away when it gets too hard/expensive? What about independent monitoring? We can ask Santana these questions – maybe they can volunteer up some ideas about all that.

**From:** John Roberts  
**Sent:** Monday, 20 October 2025 12:11 pm  
**To:** Pene Williams; Clare Fleming; Marie Payne; Pauline Marshall  
**Subject:** FYI - Santana buys part of Bendigo Station (and Ardgour)

s9(2)(h)

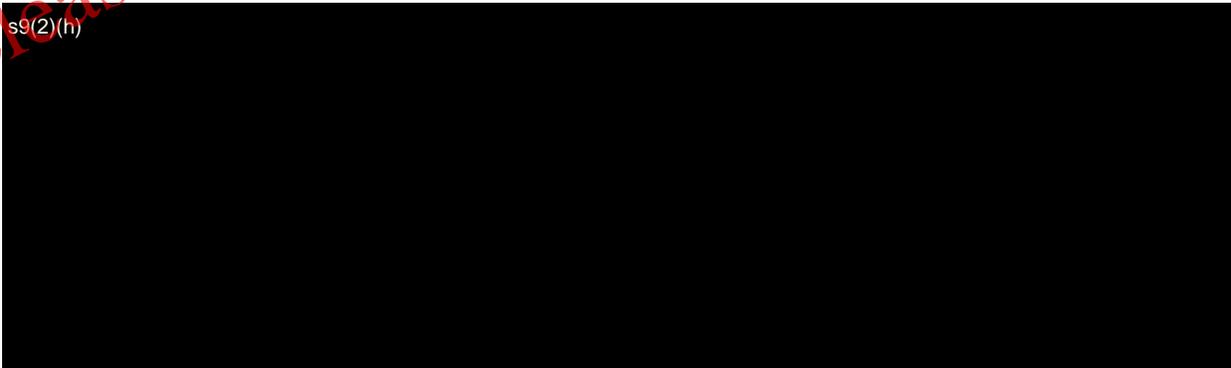


JR

---

**From:** Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>  
**Sent:** Monday, 20 October 2025 11:25 am  
**To:** Clare Fleming <[cfleming@doc.govt.nz](mailto:cfleming@doc.govt.nz)>; John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Subject:** RE: FYI - Santana buys part of Bendigo Station (and Ardgour)

s9(2)(h)



Kind regards/ Kā mihi,  
Pene

---

**From:** Clare Fleming <[cfleming@doc.govt.nz](mailto:cfleming@doc.govt.nz)>  
**Sent:** Monday, 20 October 2025 11:14 am  
**To:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Cc:** Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>

**Subject:** RE: FYI - Santana buys part of Bendigo Station (and Ardgour)

s9(2)(h)

Clare

---

**From:** Clare Fleming

**Sent:** Monday, 20 October 2025 11:03 am

**To:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Cc:** Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>

**Subject:** RE: FYI - Santana buys part of Bendigo Station (and Ardgour)

s9(2)(h)

Cheers

Clare

---

**From:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>

**Sent:** Monday, 20 October 2025 9:52 am

**To:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>; Clare Fleming <[cflaming@doc.govt.nz](mailto:cflaming@doc.govt.nz)>

**Cc:** Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>

**Subject:** FYI - Santana buys part of Bendigo Station (and Ardgour)

s9(2)(h)

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s9(2)(h)

JR

**From:** Tracey Grose <[tgrose@doc.govt.nz](mailto:tgrose@doc.govt.nz)>

**Sent:** Friday, 17 October 2025 3:15 pm

**To:** Charlie Sklenar <[csklenar@doc.govt.nz](mailto:csklenar@doc.govt.nz)>; John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; Liz Williams <[lwilliams@doc.govt.nz](mailto:lwilliams@doc.govt.nz)>; Richard Ewans <[rewans@doc.govt.nz](mailto:rewans@doc.govt.nz)>; Matt Schmidt <[mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz)>

**Subject:** FYI - Santana buys part of Bendigo Station (and Ardgour)

Kia ora koutou

Recent news item outlining Santana's proposed land purchases around Tarras (Sept and October 2025). Just fyi.

**Bendigo Station 800ha** - OIO approval pending.

- <https://centralapp.nz/NewsStory/mining-company-buys-key-bendigo-blocks/68f089ccda2d91002df9a32f>
- [Mining.com.au](https://www.mining.com.au) Santana Minerals gains Bendigo's freehold land - [Mining.com.au](https://www.mining.com.au) <https://share.google/TFAHupGLy9qloF4Uj>
- ASX announcement [Key Freehold Land and Royalties Purchased - Santana Minerals Limited \(ASX:SMI\) - Listcorp.](#)
- Otago Daily Times Online News [Slice of Shrek station sold to gold miner for \\$55 million | Otago Daily Times Online News](#) <https://share.google/2mQ9BczjFF13j2Et7>

Santana Minerals says a \$55 million agreement to buy part of a famed Central Otago high-country station is a "huge step forward" for its plan for an open-cast mine. The company has reached an agreement to purchase about 800ha of Bendigo Station, equating to about 10% of the property. The Australian and New Zealand stock exchange listed company also exercised an existing option to buy another 92 hectares of strategically located land for water supply infrastructure and pipelines related to the proposed mine development

**Ardgour Station** – OIO approval pending

[Santana Minerals' \\$25m Ardgour Station, Central Otago 'relisted' as OIO process plays out - NZ Herald](#)

[Gold miner buys Otago sheep station](#)

[Land sold to gold miner listed on Trade Me | Otago Daily Times Online News](#)

**OIO Decisions**

[Overseas investment decisions | Toitū Te Whenua - Land Information New Zealand](#)

Ngā mihi , Tracey

**Tracey Grose**

**Senior Statutory Advisor** - Kaitohu Matua ā-Ture

Southern South Island – Statutory team

s9(2)(a) | E: [tgrose@doc.govt.nz](mailto:tgrose@doc.govt.nz)

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**From:** Marie Payne  
**Sent:** Monday, 20 October 2025 10:28 am  
**To:** Sally Clarkson  
**Subject:** Tasks this week

Hey Sally,

As discussed, we need to shift focus on to pending lodgement of Bendigo...

Over the next couple of days are you able to.....

- Circulate the proposed timeframe land disturbance info to the project team – so the team wanted to understand how much land each year etc...
  - Circulate the most recent proposal documents to the team e.g. describing the activities (it might be worth checking in with Santana to see if there are any updated versions before we circulate)
  - Can you review the
    - **Freshwater advice** - provided to date and do a summary like this for the applicant [Draft DOC applicant feedback Heritage Sept 2025 \(1\).docx](#) – we don't need to rewrite the document but we need to pull out what we considered the key critical feedback to be and why we are concerned by that in the context of FT (also potential actions seems relevant too)...once this is complete we can circulate with Nicholas and then to the application
    - **Vegetation advice** – same task as above
- The learning here is that scoping to the project team could improve in the future i.e. so we are asking for feedback in this way. However, for now I think its been a useful learning here and has me across some of the key issues.
- The file structure also seems a bit messy in teams i.e. we have feedback from our experts in a couple of different places etc...would be good if we can sort this out but its more of a nice to have task than priority now.

Let me know if you have any queries happy to chat.

Kind regards,

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

**From:** Marie Burton  
**Sent:** Monday, 22 September 2025 6:49 pm  
**To:** Sally Clarkson  
**Cc:** Jenni Fitzgerald  
**Subject:** Tasks this week :)

Hey Sally,

As discussed earlier these are some key tasks to progress with over the next week whilst you are working.

### **Bendigo**

- **Disturbance info** - As you have gone through the proposal documents can you identify any information around the staging of disturbance and over what timeframes – this is information our tech advisors are seeking. If this isn't clear, can you ask Bendigo specifically?
- **GIS data request** - Max has also asked if they could provide a GIS file of the project site showing the spatial extent of any buffers incorporated into the project footprint – this might be a query for s9(2)(a)
- **Feedback summaries** continuing with the summaries of feedback to provide to Satana on their assessments noting the revised format for the Invertebrates feedback i.e. we need to be object and really clear about the impact of the feedback – i.e. what is the importance of telling them (ensuring objectiveness and identifying and how DOC would anticipate the 'gap' is rectified)
- **Meeting with regional/district council** – If you are able to talk to Liz and progress this, that would be great. Focuses for discussion would be areas of mutual interest/compensation and offsetting

Out of scope

See ya next week.  
Kind regards,

Marie

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)

**From:** Marie Payne  
**Sent:** Friday, 17 October 2025 2:29 pm  
**To:** 'shay@eds.org.nz'  
**Cc:** Jenni Fitzgerald  
**Subject:** RE: DOC/EDS check in

Kia ora Shay,

I am the DOC project lead for the Bendigo Ophir FT application, just replying on Jenni's behalf.

DOC has been progressing through the pre-lodgement consultation process with Santana, and more recently we have begun consulting directly on assessments and some aspects of the proposal with the applicant. We have responded to several OIA's recently on this application the requests/responses cover information provided by the applicant and DOC responses.

We have recently published the information we are able to release online [Bendigo Ophir Gold Mine proposal](#) there are also a further couple of releases pending in relation to more recent requests. Information has been considered and under OIA provisions, which you will be able to view too.

If you have further questions at this point please come back to us.

Kind regards,

**Marie Payne**

Programme Lead Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Shay Schlaepfer <[shay@eds.org.nz](mailto:shay@eds.org.nz)>  
**Sent:** Wednesday, 8 October 2025 8:13 pm  
**To:** Jenni Fitzgerald <[jefitzgerald@doc.govt.nz](mailto:jefitzgerald@doc.govt.nz)>  
**Subject:** Re: DOC/EDS check in

Hi Jenni,

I understand that the Department has begun consultations with Santana about its Bendigo gold mine. Are you able to please share the Department's feedback? I'd prefer not to have to proceed with OIA...

Regards,  
Shay

Released under the Official Information Act

**From:** Meg Embleton-Muir  
**Sent:** Monday, 13 October 2025 3:31 pm  
**To:** Matt Schmidt; John Roberts; Marie Payne  
**Cc:** Tracey Grose; Charlie Sklenar  
**Subject:** RE: In Confidence - Santana - Come In Time replacement access - my views

Kia ora team

I'm on leave from tomorrow for two weeks so just putting down my visitor advice on paper for you.

The standard of the track we provide is tied to the type of visitor experience DOC is offering, the type of hazards at site, and the skills and experience required by visitors to navigate those safely. This management approach is outlined in DOC's visitor safety SOP and is tied to our statutory obligations for visitor safety. In short, we need to ensure the experiences we provide and promote are clearly aligned to an agreed standard for different types of visitors with different levels of skill and risk appetite. You don't need to know the detailed theory that sits in the SOP, you just need to know that the advice below is based off an SOP for good reasons.

The 15 min Come in Time Battery Walk and the 1.5hr Aurora Track are both managed as an [Easy to intermediate walking track](#). This means the experience is provided for people with moderate fitness, on a mostly well-formed track, with a well-defined track and clear markers where necessary. Stream and river crossings are mostly bridged though small ones may not be. As a comparison the 5hr Kanuka Track (on the western side of the reserve) is managed as an [Advanced tramping track](#), which means the experience is mostly unformed track, may be rough and steep, provided for people with moderate to high fitness and remote/backcountry skills.

From a visitor access perspective, ideally we'd want to see alternative access to the Come in Time battery to be comparable to that which is provided now (i.e. easy to intermediate walking track) to ensure that those users who currently access it continue to have access within their skill-set. The DOC website refers to deep / open mine shafts and unmarked hazards off-track in this reserve. This means off-track access through the reserve is not something DOC could promote to all visitors. If we accepted this as the only access, this would limit our promotion of this site to only visitors with the highest level of backcountry experience and skill. This would reduce the opportunity for less experienced visitors to connect with the stamper heritage experience, possibly forever if the original access is not reinstated.

As previously noted, I don't support the establishment of a long, new track through the reserve as it would have significant effect on values and likely could be undertaken off PCL (per JR's alternative proposal). A new long track through the reserve would likely be at the [Advanced tramping track](#) standard which again doesn't provide for the existing user type. There is also adequate provision of this type of recreation activity in the reserve already on the Kanuka track, so there are no recreation benefits alone to establishing a new long track through the reserve.

I like the idea JR has sketched out on the topo for a potential off-PCL alternative access, particularly if the track is delivered to that comparable [Easy to intermediate walking track](#) standard. While the potential alignment is slightly longer than the current walking access to Come in Time battery, it would be something like a 30 min walk for most users on a mostly well-formed surface. This would retain access to the stamper for the existing type of user who visits it now, rather than reducing it down to only those with backcountry off-track skills and experience.

I'm out of office from tomorrow until Friday 31 October but my manager Lynnell Greer is happy to support visitor advice on this project until I'm back. Please loop her in if further advice or clarification is required.

Cheers  
Meg

---

**From:** Matt Schmidt <mschmidt@doc.govt.nz>

**Sent:** Monday, 13 October 2025 2:40 pm

**To:** John Roberts <jroberts@doc.govt.nz>; Marie Payne <mpayne@doc.govt.nz>; Meg Embleton-Muir <memuir@doc.govt.nz>

**Cc:** Tracey Grose <tgrose@doc.govt.nz>; Charlie Sklenar <csklenar@doc.govt.nz>

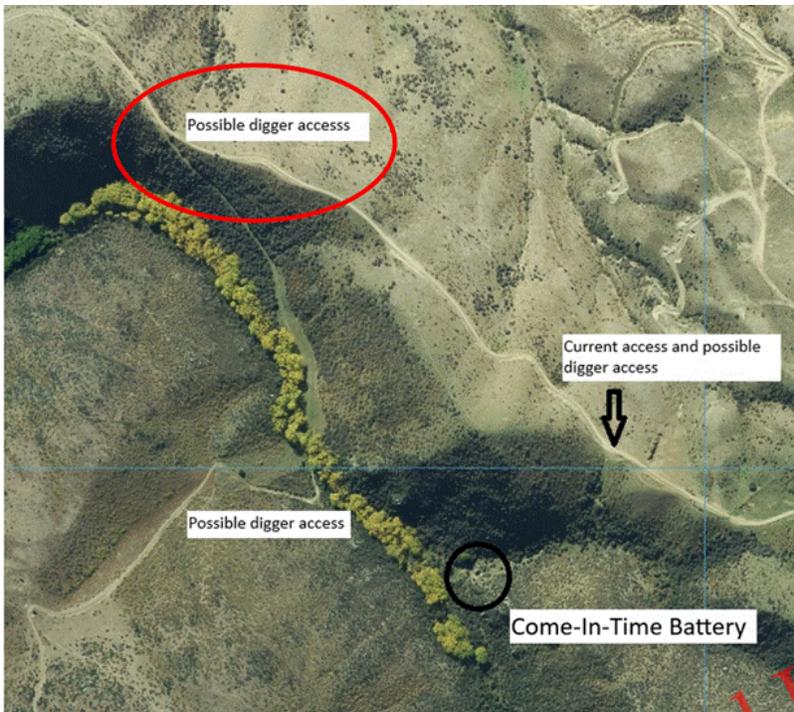
**Subject:** RE: In Confidence - Santana - Come In Time replacement access - my views

Kia ora all

Two things her for me: pedestrian access to the Come-In-Battery (remember, this is just one site of many in the Reserve worth visiting) and access for repair and maintenance of the battery.

- There is already a pedestrian access through the Reserve to the Come-In-Battery, be it very bushy at present. The TG Road access to the Come-In-Battery provides a convenient shortcut for pedestrians. If we want a poled access marked out through the Reserve to the battery, then usual planning process would be undertaken.
- Walking through the Reserve to the Battery is no different from people walking to other gold mining heritage sites through Reserves albeit currently bushier. For example, making the 45 min walk from the edge of Macetown along the old pack track to the Homeward Bound Battery; people walking from the bottom of the Whakaari Reserve 30 mins up the hill to the Scheelite Battery and then another 1hr up the hill to the Bonnie Jean Mine; people walking 1.5hrs to the Young Australian Water Wheel from Duffers Saddle.
- I just checked on this. In 2006 when we needed access to the Come-In-Battery *for our heavy equipment and machinery for the restoration*, we used the lower gorge road access seen on the map below circled in red, not the current pedestrian access up the gorge road.

Matt



Dr Matthew Schmidt  
Senior Heritage Advisor | Kaitiaki Matua Taonga Tuku Iho  
Department of Conservation | Te Papa Atawhai  
Ōtepoti | Dunedin Office, Level 1, John Wickliffe House, 265 Princes Street, Dunedin  
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International Correspondent for the Asia-Pacific Cultural Centre for UNESCO

**From:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>  
**Sent:** Monday, 13 October 2025 10:19 am  
**To:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>; Matt Schmidt <[mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz)>; Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>  
**Cc:** Tracey Grose <[tgrose@doc.govt.nz](mailto:tgrose@doc.govt.nz)>; Charlie Sklenar <[csklenar@doc.govt.nz](mailto:csklenar@doc.govt.nz)>  
**Subject:** In Confidence - Santana - Come In Time replacement access - my views

Hi team

Tracey/Charlie fyi but please do chip in as needed – note all in confidence – this all stems from Santana needing to close the TG Road for its operations; and wanting to replace access to the CIT battery via a 3-4km new track from the Welshtown area.

Put simply I think there are three options:

- the Santana proposal
- recommend no replacement access track – following closure of the TG road do nothing (except seek maintenance access for DOC and the Otago Goldfields Heritage Trust – OGHT)
- recommend to Sanatana that they explore alternative access across Bendigo Station lands – this is available – see below and attached

#### 1. The Santana proposal

- This is significantly longer access and needs 3-4km of new track
- Unsuitable wrt effects in a historic reserve and therefore the purpose for which it is held (see below). Not something we would do
- Cons Act 17U (3) The Minister shall not grant an application for a concession if the proposed activity is contrary to the provisions of this Act or the purposes for which the land concerned is held.
- Purpose of a Historic reserve is Reserves Act s18(1) - protecting and preserving in perpetuity such places, objects, and natural features, and such things thereon or therein contained as are of historic, archaeological, cultural, educational, and other special interest.
- Nor have Santana demonstrated Cons Act 17U (4) – another key test we would apply were this an application sitting with us

(4)The Minister shall not grant any application for a concession to build a structure or facility, or to extend or add to an existing structure or facility, where he or she is satisfied that the activity—  
(a)could reasonably be undertaken in another location that—  
(i)is outside the conservation area to which the application relates; or  
(ii)is in another conservation area or in another part of the conservation area to which the application relates, where the potential adverse effects would be significantly less; or  
(b)could reasonably use an existing structure or facility or the existing structure or facility without the addition

- If this was an application to DOC for this proposal we would expect them to have explored alternative access off pcl (see below)
- No mention of maintenance access (via what would be the closed for mining Thompsons Gorge Road) to the CIT Battery either for ourselves or the OGHT - (who I understand have invested much in it's restoration) .
- Question of who maintains this proposed 3-4km track over the long term – along with not needing more effects on the historic reserve, we don't need more tracks to pay for

#### 2. No replacement access track – Santana (necessarily due to HSE etc) close the existing access and we do not seek a replacement track to be built (for the above reasons)

- this option accepts loss of public access to the CIT for the duration of the life of the mine (could be 10-20 years? No idea).
- CIT becomes isolated; and in reality unavailable to the public until the existing access is restored at the end of the life of the mine
- This is a 'first principles' approach for protecting/preserving the historic fabric in the reserve that would be disturbed by a new track and rec use; but does not allow for public appreciation of CIT
- Presume access to CIT would be restored once the mine is finished – eg the TG Road access restored and ending about where the CIT carpark is now (past there would be holes in the ground)
- What about maintenance access as above during the life of the mine to protect the physical state of the CIT ? Need this vehicle access or the CIT deteriorates

### 3. Alternative access across Bendigo Station lands

- To date Santana have not explored this
- Desktop exercise shows (to me at least) a highly likely alternative route across Bendigo Station lands for all but the existing 4wd track running down to the Bendigo Creek inside the reserve near the CIT– see attached maps
- Would need an easement from Bendigo Station in favour of the public (DOC) ; a carpark at or near the junction of that existing farm road with the TG road; and a foot-track built across Bendigo Station lands to join into the reserve skirting the edge of the proposed sanctuary
- Santana are planning on building a Sanctuary area adjoining all this here – could easily be combined with those works. Seems an opportunity to combine appreciation of multiple values
- Would still need provision for allowing for vehicle access for DOC/OGHT maintenance works of the CIT via the TG road as a special thing, working with Santana wrt their HSE

My view is that we should seek that Santana explore an alternative alignment that uses the Bendigo Station lands rather the historic reserve – to my eye it seems physically relatively easy to achieve (no harder than what is being proposed already – less in fact as considerably less track building).

JR

**From:** Mandy Tocher <mtocher@lizardexpertnz.co.nz>  
**Sent:** Thursday, 9 October 2025 11:16 pm  
**To:** Sally Clarkson  
**Cc:** Marie Payne  
**Subject:** BOGP - lizard feedback on concessions

Hi Sally – some feedback on the 4 concessions below. I will add this material to the technical feedback form in the shared drive too.

All the best  
Mandy

### 1. Access to the Come In Time Battery

*Proposal: The marking (with posts), use and maintenance of a walking route to provide public access to the Come in Time Battery including any associated clearance of briar and other weed species to facilitate public walking access.*

*Comments:* The route takes in some rocky habitat that will provide habitat for At Risk – Declining Kawarau gecko and not threatened McCann's. At Risk – Declining tussock skink maybe in gully habitats/riparian areas; flushes; seepages. Kawarau gecko most likely affected. This species is nocturnal and hides beneath rock and dead/dying cushion fields of the Bendigo area. Geckos can be trampled/squashed under rocks that are stood on by people. Track is ca. 4 km long - up to ca. 50-100 geckos could be affected. A Wildlife Act authority will be required to disturb rocks.

*Suggestions to manage effects:* Lizard survey to microsite trail. Alignment of the track should avoid rocks/rock outcropping and tors. Signage should encourage people to stay on the track and not disturb rocks (lift/stand on them). No motorbikes, ebikes and bikes of any kind (bikers tend to go off track and use rocks as ramps etc). No picnicking/fires – to stop people loitering. Toilets need provided to stop people leaving waste under rocks used by lizards. Track to be informal and unformed. Geckos salvaged from alignment to avoid disturbance and accidental crushing under any rocks within a ca. 3-5 m band. Include any actual or potential effects in the project Lizard Management Plan to ensure they are accounted for in compensation offerings.

### 2. Ardgour Rise

*Proposal: The upgrading, use and maintenance of an existing vehicular track to provide public access between Ardgour Terrace and the Manuherikia Valley.*

*Comments:* [REDACTED] Upgrading the track may disturb seed bank and generate weed issues; this may be exacerbated if gravel is trucked in. Vehicles upgrading the track may need turn around areas outside existing footprint; contractors may need spoil dumping areas and temporary gravel storage areas. At Risk – Declining Kawarau gecko and not threatened McCann's. At Risk – Declining tussock skink maybe in gully habitats/riparian areas; flushes; seepages. Uphill and downhill batters of existing track will provide lizard habitat. At least two areas of rock tors/outcropping on the route. Lake's skink (nationally threatened – nationally vulnerable) maybe present in substantive rock fields if present. A Wildlife Act authority will be required to upgrade the track.

-

Suggestions to manage effects: Lizard survey to identify sensitive areas (e.g., Lake's skink habitat) where track upgrades need to be managed carefully. Kawarau geckos (and any threatened lizard species) salvaged from alignment to avoid disturbance and accidental crushing under any rocks within a ca. 3-5 m band of the road. Activities outside current track footprint to be agreed upon with herpetologist (turnaround, temporary stockpiles/spoil disposal). Side casting to avoid rocky habitats downhill. No bulldozer to be used. Include any actual or potential effects in the project Lizard Management Plan to ensure they are accounted for in compensation offerings.

### 3. Ardgour Upgrade on SH8 and Ardgour Road Intersection

*Proposal: The upgrading, use and maintenance of the intersection of State Highway 8 and Ardgour Road including the temporary use of construction laydown areas.*

*Comments:* I have surveyed road verges in this area for another project. The not threatened McCann's skinks are present in the grassy verges. A Wildlife Act authority will be required to carry out works here.

Suggestions to manage effects: Lizard survey to identify sensitive areas (e.g., McCann's skink habitat). These areas could be fenced off/avoided. Include any actual or potential effects in the project Lizard Management Plan to ensure they are accounted for in compensation offerings.

### 4. Willow Clearance

*Proposal: Willow removal from the margins of streams within the Bendigo Historic Reserve and the Marginal Strip – Bendigo Creek. Labelled on map "Willow concession area".*

*Comments:* Crack willow or grey willow need removed from site to keep waterways clear and to stop them regenerating from branch/truck wood. Large excavators will be required in riparian areas favoured by tussock skink. Riparian areas also have rock outcropping for Kawarau geckos and McCann's skink will be present too. If large areas of rock occur in and around willows, Lake's skink could be present – this is a nationally vulnerable species. Removal of willows we ultimately reduce shading of riparian areas. A Wildlife Act authority will be required to carry out works here.

Suggestions to manage effects: Lizard survey to identify sensitive areas (e.g., tussock and Lake's skink habitat). These areas could be fenced off/avoided or subject to salvage. Include any actual or potential effects in the project Lizard Management Plan to ensure they are accounted for in compensation offerings.



LizardExpertNZ

**Mandy Tocher**

*B.Sc., M.Sc. (Hon), Ph.D., M.Plan. (Dist).  
RMA hearings commissioner*

Herpetologist

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---

**From:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Sent:** Monday, 6 October 2025 3:46 pm  
**To:** Mandy Tocher <[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz)>  
**Subject:** RE: Draft Lizard Management Plan

Thanks Mandy, no you're not too late. Feel free to send those comments through too, when you're done.

Sally

---

**From:** Mandy Tocher <[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz)>  
**Sent:** Monday, 6 October 2025 3:28 pm  
**To:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Subject:** RE: Draft Lizard Management Plan

Hi Sally – yes that timeframe works ok – I think I also need to provide feedback on the concessions – I had planned to do that this week – unless I am too late?  
Thanks  
Mandy



LizardExpertNZ

**Mandy Tocher**

*B.Sc., M.Sc. (Hon), Ph.D., M.Plan. (Dist).*  
*RMA hearings commissioner*  
Herpetologist

s9(2)(a)

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**From:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Sent:** Monday, 6 October 2025 3:07 pm

To: Mandy Tocher <[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz)>  
Subject: RE: Draft Lizard Management Plan

Thanks Mandy.

In the next week or so? If that works for you.

Thanks  
Sally

---

**From:** Mandy Tocher <[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz)>  
**Sent:** Monday, 6 October 2025 12:18 pm  
**To:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>; Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Cc:** Darcy Liddell <[dliddell@doc.govt.nz](mailto:dliddell@doc.govt.nz)>  
**Subject:** RE: Draft Lizard Management Plan

Hi Sally – yes I can – is there a particular date you require this by?  
Thanks  
Mandy



LizardExpertNZ  
**Mandy Tocher**  
B.Sc., M.Sc. (Hon), Ph.D., M.Plan. (Dist),  
RMA hearings commissioner,  
Herpetologist

s9(2)(a)

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**From:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Sent:** Monday, 6 October 2025 10:48 am  
**To:** Mandy Tocher <[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz)>; Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Cc:** Darcy Liddell <[dliddell@doc.govt.nz](mailto:dliddell@doc.govt.nz)>  
**Subject:** RE: Draft Lizard Management Plan

Hi Mandy

Apologies for the double-up, I'm not sure if Marie has already responded.

No, we don't have a copy of the overall AEE or the Assessment of Ecological Effects I'm afraid.

Apart from noting, the LMP is 'token' can you provide any other feedback at this stage? Or is that difficult given that we don't have the AEE etc.

Thanks  
Sally

---

**From:** Mandy Tocher <[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz)>  
**Sent:** Thursday, 2 October 2025 10:35 am  
**To:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Cc:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>; Darcy Liddell <[dliddell@doc.govt.nz](mailto:dliddell@doc.govt.nz)>  
**Subject:** Re: Draft Lizard Management Plan

Hi Marie- thanks- it refers for detail to the aee- do we have that ? It's a token Imp unfortunately. I can't access the folder again - have let Roger know. Thanks  
Mandy  
Sent from my iPhone 14 pro

On 2 Oct 2025, at 9:21 AM, Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)> wrote:

Hey both,

Just FYI the draft LMP got sent through – Mandy has it and I put the file in the teams channel and updated the document register. Not sure if it also needs adding to our feedback chart Sally?

Darcy, I can't imagine you get into the detail of this but likely liaise with Mandy – we have found to date the management plans often contain a lot of information to meet the requirements of Schedule 7 FTAA.

Any questions please let me know.

Kind regards,

Marie

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)

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<image002.png>

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**From:** s9(2)(a) [redacted]@santanaminerals.com>  
**Sent:** Wednesday, 1 October 2025 10:50 am  
**To:** Marie Payne <mpayne@doc.govt.nz>; Mandy Tocher <mtocher@lizardexpertnz.co.nz>; John Roberts <jroberts@doc.govt.nz>  
**Cc:** Matt Baber <mbaber@allianceecology.co.nz>; s9(2)(a) [redacted]@santanaminerals.com>  
**Subject:** Draft Lizard Management Plan

Good morning,

Please find attached draft copy Lizard Management Plan.

Regards

s9(2)(a) [redacted]

Santana Minerals | Cromwell, NZ

M: s9(2)(a) [redacted]

W: [www.santanaminerals.com](http://www.santanaminerals.com)

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**From:** Marie Payne  
**Sent:** Friday, 10 October 2025 12:57 pm  
**To:** s9(2)(a)  
**Cc:** Jenni Fitzgerald; s9(2)(a)  
**Subject:** FW: DOC Feedback on draft concession proposals - Bendigo Ophir Gold FT Project  
**Attachments:** DOC Feedback on concessions proposals and conditions Sept 2025.pdf; Attachment A Concessions example special conditions.pdf; Attachment B Approved FTAA Section 78 Conditions for concessions.pdf; Attachment C Survey plans SO 1202 & SO 834 in relation to heritage.pdf

Hi s9(2)(a)

As discussed here is our feedback re concessions.

As per the meeting it seems like the key considerations to work through are:

- Feasibility of the proposed walking track/alternatives – whilst we appreciate that the intent here is to maintain public access, we are unsure if the proposal is the most feasible way to do this. Regardless there will be a loss benefit from closing off the existing access that DOC would expect to see mitigated/compensated as part of a proposal. I have set up a meeting with the project team next week to find a way forward on this and will discuss with you further post that meeting.
- A future covenant and how this would work – e.g. values sought to protect/benefiter
- Compensation/mitigations – it would be good to see the proposal holistically – if you can share the management plan relating to this that would be helpful. As noted in the meeting DOC is concerned that heritage (which is a key value protected by the current covenant) is currently not strongly represented
- Sharing of draft applications – DOC is happy to provide more detailed and specific focus on the draft applications to support that the mechanics of any proposal will work in practice/its view on meeting information requirements and feedback on conditions.
- Noted the attached feedback excludes the monitoring concession which was shared today – if you can provide further detail directly on that we can also provide feedback.
- The other key takeaway from today was roading/roading infrastructure – ensuring the longer-term intent for this to be managed by another party e.g. CODC or NZTA is clear and supported by conditions. I see Jenni has already sent an email off re the intersection.

Kind regards,

Any question happy to discuss further otherwise I will be in touch next week.

Kind regards,

Marie

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Marie Burton

**Sent:** Thursday, 18 September 2025 2:07 pm

**To:** s9(2)(a)@santanaminerals.com>

**Cc:** John Roberts <jroberts@doc.govt.nz>; Pene Williams <pwilliams@doc.govt.nz>

**Subject:** DOC Feedback on draft concession proposals - Bendigo Ophir Gold FT Project

Hey s9(2)(a)

Please find attached DOC's feedback on the concessions proposals and conditions.

As you will see the feedback is at a relatively high-level (noting some of the considerations we have raised might be addressed elsewhere in the documents you have provided) and that there are a few key issues we would like to work through further. I'm happy to discuss/take a call, but also suggest (as I think you are planning anyway) that working through in a meeting/workshop setting might work best?

Kind regards,

Marie

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

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18-Sept-25

**Bendigo-Ophir Gold Project – Department of  
Conservation feedback on proposed concessions**

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## Document summary

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## Summary

DOC has collated this feedback in relation to concession applications that it is advised by the applicant will be sought as part of the Bendigo-Ophir Gold Fast-track Project.

Primarily informing DOC's feedback is the review of:

- **Section 3 - BOGP Working Draft Substantive Application Report - Project Description (29 August 2025)** provided Sept 2025
- **GIS files detailing concessions** provided July 2025
- **Draft DOC Concession and Conditions** provided Sept 2025:
  - **Access Route to CIT Battery**
  - **Ardgour Rise**
  - **SH8 and Ardgour Road Intersection**
  - **For Willow Clearance**

This document provides initial feedback at a high level and is reflective of the timeframes involved in its preparation, it is also noted feedback is not informed by complete application documents (as these have not been provided to date). As initial feedback, further commentary may be informed by future information and discussion with the applicant. DOC is committed to ongoing engagement to streamline issues prior to lodgement and work through the details of the proposal.

DOC is also aware that other recreational groups and users may use (have interests in) and/or existing permissions on Public Conservation Land (PCL) in relation to the activities proposed. There may also be existing approvals provided in relation to the existing covenant on the project site. DOC is currently reviewing existing approvals information as part of the pre-lodgement consultation process and will share this as and when it is available. We also encourage proactive engagement with other recreational users as you prepare your application.

# 1. Come In Time Battery Access Concession Proposal through the Bendigo Historic Reserve

## Description

DOC has based its feedback on the information provided in Section 4-BOGP working Draft Substantive application Report – Approvals Sought 29 August.

A **concession** (permit) for activities occurring on public conservation land within the Bendigo Historic Reserve as follows:

- > The replacement of the existing walking track to the Come-in-Time Battery via a new marked route west of the battery location. This route will be comprised of marker poles to guide walkers and will include the installation of a welcome / information sign at the start of the track at Blue Mines Road; and
- > Any incidental vegetation clearance (including briar) using hand tools only to enable the route.

The Come-in-Time Concession Area is illustrated in Figure 4-3 below.



Figure 0-1: Come-in-Time Concession Area

## DOC Feedback on proposal summary

Based on the information DOC has reviewed to date, it is unclear what the purpose of this concession is and why the proposal/an alternative could not be reasonably undertaken in places where adverse effects would be significantly less.

The significant adverse effects are on conservation of the historic heritage resources the Bendigo Historic Reserve (BHR) contains, including the significant heritage landscape as the backdrop of the history being conserved. Tracks through historic reserves are planned carefully and standard practice (heritage evaluation) would apply which is not evident as part of the proposal. Additionally, the practical feasibility of the track does not appear fully considered. (e.g. on-going maintenance, health and safety considerations, specific effects on biodiversity values).

As part of this process DOC would like to discuss this proposal further.

More specific commentary is detailed in Table 1 below.

**Table 1: High level – Conservation values and effects considerations**

<b>Conservation value/effects consideration</b>	<b>DOC commentary</b>	<b>Further considerations/commentary in relation to conditions</b>
Across all	<p>The proposed track will significantly change the existing public accessibility of the Come in Time resulting in adverse effects on conservation values particularly in relation to heritage and the BHR. As above track planning through heritage sites requires careful planning and thorough evaluation where best practice standards are applied. This is not identified in the documentation provided to date.</p> <p>Public and DOC management access to the Come in Time will be considerably affected in terms of accessibility. This will influence access to historical heritage/ recreational use/ maintenance as the alternative track is a significantly different offering to the existing. DOC is unable to identify how the effects of the new track which is proposed are assessed in detail in relation to the specific concession proposal. This includes commentary on ongoing maintenance, ancillary requirements or restoration of the existing track in the future.</p>	<p>On-going engagement to discuss avoiding closing the existing access with applicant e.g. where potential adverse effects would be significantly less or the feasibility of alternative access (e.g. through Bendigo Station) solutions to the Come In Time. Battery.</p> <p>Notwithstanding the above any route (including the proposal) needs to be carefully evaluated and planned to avoid and minimise adverse effects on heritage values. Any proposal should also be considered in terms of ongoing feasibility to ensure minimal impacts/appropriate mitigations/offsetting in terms of biodiversity/heritage values.</p>

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<p>Heritage</p>	<p>The current access provides efficient site access for management of historical infrastructure and is established in the landscape. The Come in Time Battery and access has been implemented in alignment with the purpose of the BHR.</p> <p>As above more thorough consideration needs to be given to the primary purpose of the BHR which is to conserve the historic heritage values against an unimpeded heritage landscape.</p> <p>Heritage considerations in relation to the purpose for which the land is held will inform DOC's assessment of this proposal. DOC's view is that the existing proposal does not align with this.</p>	<p>Avoidance of restricting current access is the most desirable outcome, further engagement required as above.</p>
<p>Biodiversity – physical works</p>	<p>There will be physical and other related effects in relation to this proposed concession e.g. associated track/clearance and its on-going effects from future use (acknowledging construction is anticipated to be limited to hand tools and way markers).</p> <p>DOC also notes this area of PCL is a reserve and threatened plants have been previously recorded within close proximity of the site alongside protected Wildlife. Protection of indigenous fauna and flora is a secondary BHR purpose.</p>	<p>DOC anticipates that more information around the formation of any track and assessment of effects would be provided as part of the concession application's effects assessment.</p> <p>Additionally, if any physical works were required (though not currently proposed) the scope of Wildlife approvals should consider this.</p>

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<p>Recreation – Feasibility and accessibility</p>	<p>Given the dense bush and topography of the site where the new track is proposed it is anticipated that further information assessing the feasibility and safety of this proposal would also need to be considered further.</p> <p>Existing tracks in the Reserve are directly linked to experiencing the heritage places with the added aspect of “wander-at-will and discovery” due to limited tracking in other locations of the Reserve.</p> <p>Consideration needs to be given to whether the potential adverse effects of a new track outweigh potential benefit.</p>	<p>As above further engagement required.</p>
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**Feedback on Conditions for Come in Time Battery Concession**

DOC’s view is that further engagement is required on this issue. Notwithstanding this view, feedback on the draft conditions provided is as below. Given the limited application detail DOC’s feedback on conditions at this point in time is restricted and is provided at a high-level.

Conditions feedback provided is based on the *Draft DOC Concession and Conditions for Access Route to CIT Battery (5 Sept 2025)*

**DOC comment proposed Schedule 1 Conditions**

<p>2.</p>	<p><b>Concession Activity</b> (clause 2)</p>	<p>The marking (with posts), use and maintenance of a walking route to provide public access to the Come in Time Battery including any associated clearance of briar and other weed species to facilitate public walking access. <b>Would anticipate the standard of track would be included e.g. SNZ HB 8630:2004 NZ Handbook for Tracks and Outdoor Visitor Structures</b></p>
<p>5.</p>	<p><b>Final Expiry Date</b> (clause 3)</p>	<p>10 years from the grant of the concession, <b>subject to any renewal being granted. Remove there is no ability to renew – noting this would the timeframe be adequate given the proposed activities?</b></p>

**Schedule 3:**

**SPECIAL CONDITIONS**

Please see attachment A) and Attachment B) which contain examples of concession conditions for consideration and approved Section 78 conditions.

In the timeframe provided and based on the level of information provided, DOC has been unable to provide comprehensive feedback on the specific special conditions proposed.

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## 2. Ardgour Rise Concession Area Proposal

### Description

DOC has based its feedback on the information provided in Section 4-BOGP working Draft Substantive application Report – Approvals Sought 29 August.

### Ardgour Rise Concession Area

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 as follows:

- The establishment of a portion of the realigned Thomson Gorge Road (i.e. Ardgour Rise) which consists of an approximately 4 m wide 4WD gravel track and any associated vegetation clearance, earthworks and construction activities (including erosion and sediment control measures).

The Ardgour Rise Concession Area is illustrated in Figure 4-1 below.



**Figure 41: Ardgour Rise Concession Area**

### DOC Feedback on proposal summary

DOC considers that this concession may be better managed in the longer term though a change in status of the land/upgrade to a public road and this can be explored further during pre-lodgement. A suitable way to manage this may be through conditions.

**Table 2: High level – Conservation values and effects considerations**

Conservation value/effects consideration	DOC commentary	Further considerations/commentary in relation to conditions
<p>General</p>	<p>The Ardgour Conservation Area (ACA), held as s.25 Stewardship Area.</p> <p>The specific detail of the upgrading has not been identified in the proposal documents viewed to date. Upgrades to the existing 4WD track would likely have greater landscape impact, visually and audibly, given the anticipated design and use. This may be somewhat offset generally by the removal of the TGR (as its replacement) but not for the ACA specifically.</p> <p>It is anticipated most drivers would stay on the new road but those who seek to offroad could easily do so and be drawn there.</p> <p>As required under the FTAA DOC will provide commentary on the proposal’s alignment with the Otago Conservation Management Strategy (CMS), and ACA is not an area where vehicle access is shown as permitted. The application states that the Ardgour Station easement ‘overrules’ CMS policy, so as to allow the proposed road, given it already allows the Station to permit passage of ‘invitees’, that can include the public, at any time of day or night, on foot or by vehicle etc. However, ‘invitees’ does not and has not equated to open public access but is restricted to specific invitation in line with the Station’s operational needs. Compared to usage on a farm track, a new public road would automatically and significantly increase public access to and through ACA and so increase the level of adverse effects, contrary to the intent of the easement and CMS – these are examples of the potential effects that should be considered in further detail.</p> <p>Consideration needs to be given to how the proposal aligns with the purpose for which the land is held. A change of land status/establishing a public road is a pragmatic option to explore and could be reflected in conditions e.g. during the term of the concession the land which the road is on is disposed of by DOC to another appropriate agency.</p>	<p>Vesting the road with CODC is proposed, DOC is currently unaware of how this can be facilitated through the FTAA and would recommend seeking further advice.</p> <p>Further detail about the proposed concession and upgrade alongside potential effects and mitigations is needed to inform appropriate effects management/maintenance and conditions.</p> <p>A land exchange or condition should also be explored which proposes disposing of land used for/creating a public road to ensure efficient future management.</p>
<p>Biodiversity – physical works</p>	<p>The physical impacts of widening the road and the future use have the potential to have effects on erosion, plant damage and native wildlife disturbance. A specific effects assessment in relation to the proposal has not been identified.</p>	<p>Further detail around the proposed activity and the specific associated effects is needed to understand potential mitigations and conditions. Potential offsetting/mitigation activities might also need to be covered by a concession.</p>

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Recreation – Feasibility and accessibility	<p>It is likely there would be disturbance to small game hunting, albeit likely minor, but significantly more risk to passers-by which is likely to require a change to/closure of the Open Hunting Permit Area.</p> <p>Existing public access to the Bendigo Conservation Area from Thomson Gorge Road to the primarily hunting and 4WD Mt Moka easement access would remain unaffected so long as the Ardgour Rise new road is secured.</p> <p>Existing permissions and concessions in relation to this area of PCL will also need to be considered in relation to the proposal.</p>	<p>Further consideration of the recreational points identified will further support appropriate effects assessment and management including conditions.</p> <p>DOC encourages the applicant to engage with other recreational users who may be affected by the proposal. (e.g. Otago Goldfields Heritage Trust, 4WD clubs, recreational hunting clubs).</p>
Heritage	No heritage issues identified other than to check if the 19 <sup>th</sup> century surveyors iron pipe (IP) on Survey Plans SO 1202 & SO834 (Attachment C)	Advice to check survey plans as provided and assess.

### Feedback on Conditions for Ardgour Rise

Feedback on the conditions provided is as below. Given the limited application detail DOC's feedback on conditions at this point in time is restricted and .is provided at a high-level.

#### Schedule 1:

2.	<p><b>Concession Activity</b> (clause 2)</p>	<p>The upgrading, use and maintenance of an existing vehicular track to provide public access between Ardgour Terrace and the Manuherikia Valley. <b>Need to specify use of the track/road and to what standard the track/road will be maintained alongside how the costs of the activity will be managed.</b></p>
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### Special Conditions

Please see attachment A) and Attachment B) which contain generic examples of concession conditions for consideration and Section 78 conditions. Note a condition to change the status of the road e.g. disposal or public road during the term of concession would be a pragmatic approach to manage the longer-term effects of this proposal.

### 3. SH8 Concession Area Proposal

#### Description

DOC has based its feedback on the information provided in Section 4-*BOGP working Draft Substantive application Report – Approvals Sought 29 August*.

#### **SH8 Concession Area**

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 as follows:

- *Safety improvement upgrades within the existing road reserve at the SH8 / Ardgour Road intersection, which includes:*
- *The formation of a 3.5 m wide right turn bay on SH8;*
- *The reprofiling of the existing roadside safety barrier on Ardgour Road to follow the new road edge alignment;*
- *The widening of the SH8 road carriageway and provision of 1.5 m wide road shoulders; and*
- *New pavement marking and give way controls; and*
- *All associated construction activities including the establishment of construction laydown areas, erosion and sediment control measures, any necessary culverts and temporary traffic management measures.*

*The SH8 Concession Area is illustrated in Figure 4-2 below.*



**Figure 42: SH8 Concession Area**

**DOC Feedback on proposal summary**

On review of the information provided the existing SH8 / Ardgour Road intersection does not align with legal road and crosses PCL – Lower Lindis (held as s.25 stewardship area). Given this, a pragmatic approach may be to further explore the misalignment/proposed use and how this may be better managed in the longer term. (e.g. through a change in land status/land exchange) which could be addressed through conditions or the FTAA).

Further commentary is provided in Table 3 as below.

**Table 3: High level – Conservation values and effects considerations**

Conservation value/effects consideration	DOC commentary	Further considerations/commentary in relation to conditions
General	<p>Safety improvements agreed with NZTA, will marginally increase the existing encroachment.</p> <p>Roading on a PCL will not align with the purpose for which the land is held.</p> <p>10yr concession period also noted.</p>	<p>Explore longer term solution as part of pre-lodgement consultation and consider if this can be facilitated through the FTAA (e.g. conditions).</p> <p>Is the proposed 10yr timeframe for the concession appropriate for the activity.</p>

Biodiversity	Further assessment required in relation to the specific concession proposal.  Freshwater values and associated effects would require management. Native and exotic fish identified within close proximity to proposal	Pending further advice maybe likely that impacts on biodiversity values is low – this should be confirmed via assessment and DOC can provide further feedback.
Recreation	It is noted that recreational users include Otago fish and game who may be affected. The Lindis River is considered a regionally significant trout fishery. Again, to fully consider effects need to identify any relevant and existing permission holders and concessionaires.	Further assessment required but likely minor/temporary impact.
Heritage	No heritage issues.	

### **Feedback on Conditions for SH8 Concession Area**

Initial feedback is provided based on the conditions provided. Given the limited application detail DOC's feedback on conditions at this point in time is restricted and .is provided at a high-level.

#### **Schedule 1:**

2.	<b>Concession Activity</b> (clause 2)	The upgrading, use and maintenance of the intersection of State Highway 8 and Ardgour Road including the temporary use of construction laydown areas. <b>Needs to specify how ongoing public access will be managed or controlled as part of the activity.</b>
13.	<b>Health and Safety</b> (clause 13)	Audited Safety Plan: Not required. <b>Health and Safety plan anticipated as required for this activity</b>

### **Special Conditions**

Please see attachment A) and Attachment B), potentially relevant concession conditions for consideration and Section 78 conditions. Note a condition to change the status of the land e.g. disposal during the term of concession would be a pragmatic approach to manage the longer-term effects of this proposal. As above based on the level of specific application information provided to date DOC has been unable to provide further comprehensive feedback on these conditions other than as below.

### Plans of Proposed Intersection Upgrade

2. The Concessionaire must submit plans of the proposed intersection upgrade to the Department of Conservation prior to the commencement of construction (for information purposes). **Please clarify the purpose of this condition – is it intended DOC can feedback in relation to the construction lay down area will that be incorporated? (e.g. to reflect whether the proposal will facilitate DOC/Public need).**

### Erosion and Sediment Control

3. The proposed intersection upgrade must be undertaken in accordance with a Site-specific Erosion and Sediment Control Plan (“SSESCP”) which is to be certified by a Suitably Qualified and Experienced Expert approved by Otago Regional Council prior to the proposed commencement of the activities that are the subject of the SSESCP commencing. **Is it intended that ORC certify this condition? Usually DOC would recommend oversight to ensure the rest of the reserve and adjoining waterway is protected as the ‘land owner’ Please clarify intent.**

### Temporary Construction Traffic Management Plan

4. The Concessionaire undertake the proposed intersection upgrade in accordance with the Temporary Construction Traffic Management Plan certified as part of the approval of the BOGP under the Fast-track Approvals Act 2024. **Please clarify intent – is this intended to be managed by a third party?**

### Expectations of the Public

5. While undertaking the Activity the Concessionaire must not exclude or impede the public from accessing any sites, tracks or facilities.
6. If approached by members of the public while carrying out the Activity, the Concessionaire shall provide an explanation of why the Activity is taking place.

**Please specify how this management will take place (e.g. public vehicle access management) and describe how any health and safety obligations will be addressed e.g. signs warning/informing the public of works and need to follow H&S directions.**

## 4. Willow Concession Area Concession Proposal within the Bendigo Historic Reserve

### Description

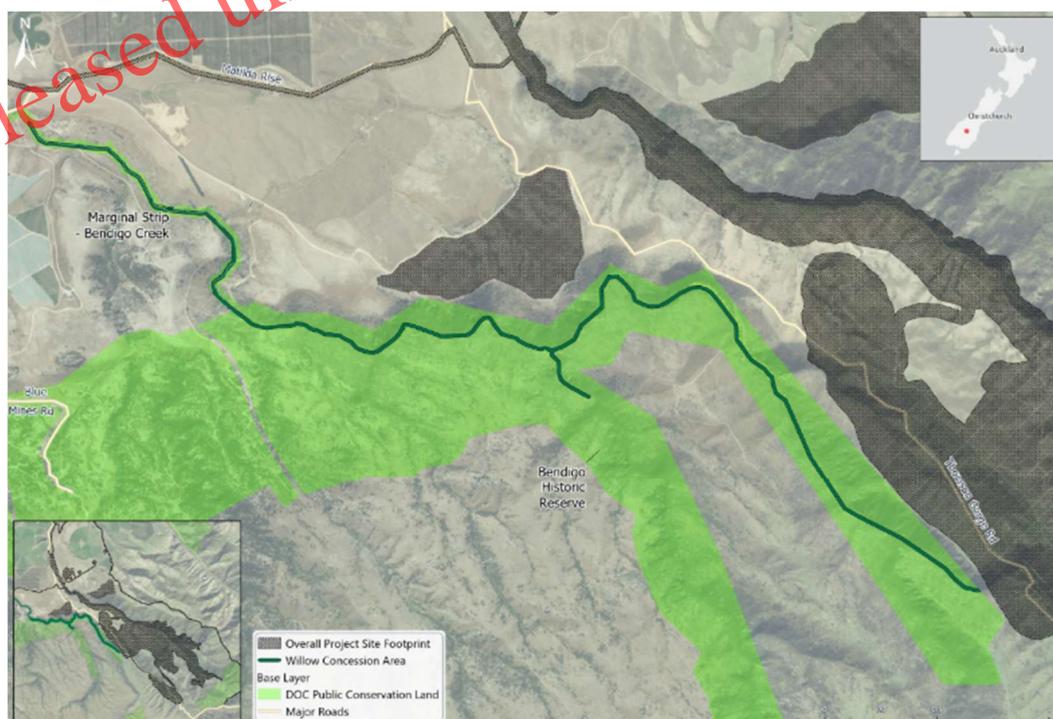
DOC has based its feedback on the information provided in Section 4-BOGP working Draft Substantive application Report – Approvals Sought 29 August.

### Willow Concession Area

A **concession** (permit) for activities occurring on public conservation land within the Bendigo Historic Reserve as follows:

- The management of crack willows out of Bendigo and Clearwater Creeks, which will include (with agreement of the Department of Conservation) the spraying of herbicide to kill willow trees, the progressive and / or partial removal of willow trees, and the partial replacement of cover with native vegetation;
- All necessary associated vegetation clearance and land disturbance activities (including the formation of access tracks) and replacement planting activities; and
- Monitoring activities within the first four years of spraying crack willows to monitor any regrowth of crack willow and native scrub along riparian zone.

The Willow Concession Area is illustrated in Figure 4-4 below.



**Figure 44: Willow Concession Area**

### **Feedback on Willow Concession Area concession proposal**

DOC's feedback on this activity proposal is limited as it appears to be part of a wider management plan, it is noted that this may relate to the creation of the alternate track to the Come In Time in the Bendigo Historic Reserve which relates to commentary in Section 1 of this report.

**Table 4: High level – Conservation values and effects considerations**

<b>Conservation value/effects consideration</b>	<b>DOC commentary</b>	<b>Further considerations/commentary in relation to conditions</b>
General	<p>It is unclear what the strategy is in relation to this concession e.g. an ongoing activity or one time.</p> <p>Potential authorisation to allow work in the Bendigo Reserve and Bendigo marginal strip may also be required.</p>	Notwithstanding the commentary on 1. Further information needed to inform concession administration and relevant conditions.
Heritage	The activity is in close proximity or around various heritage/ archaeological sites and within a related heritage landscape in a Historic Reserve.	See feedback in Section 1.
Biodiversity	<p>No further specific biodiversity assessment identified in relation to this activity which may inform further DOC commentary (e.g. freshwater assessment)</p> <p>Noted threatened plant species and protected wildlife identified within proximity to the area.</p>	Specific effects and proposed management should be clearly identified in relation to this proposed concession – may also inform conditions.
Recreation	<p>Potential effects on recreational users if proposed Come In Time Battery alternative track progressed.</p> <p>Potential other users (e.g. Fish and Game) existing permission holders and concessionaires may be affected.</p>	Specific effects and proposed management should be clearly identified in relation to this proposed concession – may also inform conditions.

### **Feedback on Conditions for Willow Concession Area**

DOC's view that further engagement is required on this issue (see Section 1).

Notwithstanding this view, feedback on the conditions provided is as below. Given the

limited application detail DOC’s feedback on conditions at this point in time is restricted and .is provided at a high-level.

**Schedule 1:**

2.	<b>Concession Activity</b> (clause 2)	The clearance of willow trees. <b>If ancillary to another activity (management plan) this could be referenced – is ongoing maintenance proposed/required?</b>
5.	<b>Final Expiry Date</b> (clause 3)	10 years from the grant of the concession, subject to any renewal being granted. <b>Is the 10 year timeframe relative to the activity proposed?</b>
13.	<b>Health and Safety</b> (clause 13)	Audited Safety Plan: Not required. <b>DOC would anticipate that this is required based on the nature of the activity.</b>

**Special Conditions**

Feedback on these conditions is not withstanding feedback in Section 1 of this document.

Please see attachment A) and Attachment B), potentially relevant concession conditions for consideration and Section 78 conditions. As above, in the timeframe provided DOC and based on the level of information provided, DOC has been unable to suggest comprehensive feedback on these conditions other than as below.

**Expectations of the Public**

- 3. While undertaking the Activity the Concessionaire must not exclude or impede the public from accessing any sites, tracks or facilities.
- 4. If approached by members of the public while carrying out the Activity, the Concessionaire shall provide an explanation of why the Activity is taking place.

**Due to the nature of the activity proposed and for reasons of public safety it is considered likely that restrictions on public access whilst the activity is being undertaken maybe required.**

**Records**

- 6. All records of the Activity shall be made available for inspection at reasonable times by officers of the Grantor. **Have reports been considered as an alternative option i.e. reports provided to DOC within 3 months of the activity being completed.**

## **Attachments**

- A) Example special conditions for concessions
- B) Approved FTAA Section 78 Conditions for concessions
- C) Survey plans SO 1202 & SO 834 in relation to heritage

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Attachment A) Example special conditions for concessions

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<b>Concession type</b>	<b>Condition reference</b>	<b>Draft condition text</b>
Concessions	<b>Public Access</b>	This Concession does not authorise exclusive use of the Land. The Concessionaire will not prevent public access to and enjoyment of the Land or parts of the Land unless written approval to do so has been obtained from the Grantor.
	<b>Landform, fauna and flora</b>	Landform modification and vegetation cutting or removal is not permitted unless specifically authorised by this concession or otherwise in writing by the Grantor. The Land must be left in the same or better condition than it was found to the satisfaction of the Grantor. The Concessionaire, its staff, contractors or clients must not entice, feed, touch, chase, surround or otherwise disturb wildlife. This includes not playing recordings of bird songs or using bird callers on the Land.
	<b>Vehicle use</b>	The Concessionaire must ensure that none of its vehicles or vehicles of its clients are taken off formed roads and outside approved construction areas.
	<b>Suspension for plant and / or animal control</b>	The Grantor by giving one month's written notice to the Concessionaire may suspend the carrying out of the Concession Activity while plant or animal control is carried out by or on behalf of the Grantor on the Land or on adjoining land. The Grantor, at the sole discretion of the Grantor, may adjust the Concession Fee payable or refund any Concession Fee paid in advance.
	<b>Accidental Discovery Protocol [amendments are required if the site is subject to heritage status]</b>	The Concessionaire must take all reasonable care to avoid any archaeological values on the Land which includes (but is not limited to) historic sites and protected New Zealand objects on the Easement Land. In the event that archaeological sites

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Attachment A) Example special conditions for concessions

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		<p>or other features with heritage values are found during any approved earth disturbance work on the Easement Land:</p> <ul style="list-style-type: none"> <li>a) Work must cease immediately until further notice and advice must be sought from the Grantor;</li> <li>b) If it is an archaeological site as defined by the Heritage New Zealand Pouhere Taonga Act 2014 then Heritage New Zealand must be contacted and its advice sought;</li> <li>c) If it is an archaeological site relating to Māori activity then local iwi must be contacted and their advice sought;</li> <li>d) If it is an artefact as defined by the Protected Objects Act 1975 then the Ministry for Culture and Heritage must be notified within 28 days;</li> <li>e) If it is human remains the New Zealand Police should also be notified;</li> <li>f) In the event of cessation of approved work because of discovery of potential historical artefact or archaeological site the Concessionaire must not recommence work until permitted to do so by the Grantor.</li> </ul> <p>The Concessionaire must take reasonable and proper care not to damage any property of the Grantor and must promptly repair any such damage.</p> <p>If the Concessionaire opens up the surface of the Land the Concessionaire must immediately upon completion of any works restore the surface of the Land as nearly as possible to its former condition to the satisfaction of the Grantor.</p> <p>Nothing contained or implied in this Concession requires the Grantor or the Concessionaire to supply services on or under the Land or entitles the Concessionaire to interfere with the services of any other user of the Land.</p>
	<p><b>In respect to Ngāi Tahu</b></p>	<p>The Concessionaire is requested to consult the relevant Papatipu Runanga (<a href="http://www.ngaitahu.iwi.nz">www.ngaitahu.iwi.nz</a>) if they wish to use Ngāi Tahu cultural information. If the Concessionaire wishes to use the Tōpuni or statutory acknowledgement information contained in schedules 14-108 of the Ngāi Tahu Claims Settlement Act 1998, or any</p>

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Attachment A) Example special conditions for concessions

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		<p>Grantor produced interpretative material in respect to Ngāi Tahu cultural information, they are requested to notify the relevant Papatipu Rūnanga, as a matter of courtesy.</p> <p>The Concessionaire must, as far as practicable, attend any workshops held by the Department of Conservation for the purpose of providing information to concessionaires, which is to include the Ngāi Tahu values associated with Topuni areas.</p> <p>The Concessionaire must ensure any persons employed by the Concessionaire are requested to recognise and provide for Ngāi Tahu values in the conduct of their activities.</p>
	<p><b>Private land</b></p>	<p>This Concession does not confer any right of access over any private land or public conservation land leased by the Grantor. Any arrangements necessary for access over private land or leased land are the responsibility of the Concessionaire. In granting this Concession the Grantor does not warrant that such access can be obtained.</p>
	<p><b>Monitoring and compliance</b></p>	<p>The Grantor may send any officer of the Department, agent or contractor to assess the impact of the activities on conservation values, inspection of structures or buildings (if applicable), the standard of service offered and compliance with the terms and conditions of the Concession, at no expense to the Grantor.</p> <p>If the Grantor determines that compliance with the conditions of this Document or the effects of Concession Activity should be monitored, the Concessionaire shall meet: either:</p> <ul style="list-style-type: none"> <li>a) the full costs of any monitoring programme that is implemented; or,</li> <li>b) if the Grantor determines that the costs should be apportioned among several Concessionaires who use the same locations, part of the costs of the monitoring programme.</li> </ul>

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Attachment A) Example special conditions for concessions

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		<p>These costs will include the Department of Conservation’s standard charge-out rates for staff time and the mileage rates for vehicle use associated with the monitoring programme.</p> <p>If the Grantor determines that compliance with the conditions of this Concession or the effects of Concession Activity should be monitored, the Concessionaire shall meet:</p> <ul style="list-style-type: none"> <li>(a) either the full costs of any monitoring programme that is implemented; or,</li> <li>(b) if the Grantor determines that the costs should be apportioned among several Concessionaires who use the same locations, part of the costs of the monitoring programme. These costs will include the Department’s standard charge-out rates for staff time and the mileage rates for vehicle use associated with the monitoring programme.</li> </ul>
	<p><b>Public Access and Recreation</b></p>	<p>The Concessionaire must ensure that they take all reasonable steps not to interfere with recreational use of the land.</p> <p>The Concessionaire must erect warning signs to warn the public that machinery may be operating. These signs must not indicate that public access to the site is limited in any way and must be removed from the site at the end of each day.</p>
	<p><b>Weeds</b></p>	<p>Concessionaire must notify the Grantor if any new weed species appear at the Sites.</p>

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	<p><b>Wildlife and vegetation</b></p>	<ol style="list-style-type: none"> <li>1. The Concessionaire must take all practical measures to minimise adverse effects on wildlife, vegetation and ecological values. This must include measures to avoid disturbing birds and their nests, spawning fish <i>Any waste or rubbish, including organic waste, must be contained, separated at source if recyclable, placed in a designated area, removed and disposed of in an appropriate manner / at an authorised facility at regular intervals/weekly and on completion of the activity to ensure it does not become a contaminant or present a potential hazard to wildlife.</i></li> <li>2. The Concessionaire will comply with all Hazardous Substances and New Zealand Organisms Act 1996 (HSNO) regulations and requirements for the storage of hazardous substances, including fuel: <a href="http://www.business.govt.nz/worksafe/information-guidance/guidance-by-industry/hsno">http://www.business.govt.nz/worksafe/information-guidance/guidance-by-industry/hsno</a>. Storing greater than 50 litres of petrol will require approval from the Grantor.</li> <li>3. The Concessionaire will ensure than any refuelling, lubrication and/or maintenance and mechanical repairs on any machinery are undertaken in an appropriate area where any spillages can be contained. No refuelling is to take place within 10m of any waterway.</li> <li>4. In the event of any hazardous substance spill the Concessionaire must:             <ol style="list-style-type: none"> <li>(a) Take all practicable measures to stop the flow of the substances and prevent further contamination of Land or water; and</li> <li>(b) Immediately contain, collect and remove the hazardous substances and any contaminated material, and dispose of all such material in an appropriate manner / at an authorised facility; and</li> <li>(c) Notify the Grantor as soon as practicable; and</li> <li>(d) Undertake any remedial action to restore any damage to the soil; and</li> <li>(e) Take all measures to prevent any reoccurrence.</li> </ol> </li> </ol>
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Attachment A) Example special conditions for concessions

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		<p>5. <i>The Concessionaire is not permitted to light any open fires on the Land.</i> and to avoid stranding fish in pools.</p> <p>Where breeding or nesting sites have been found, the Concessionaire will create a buffer zone (specify minimum distance) around each site during the nesting season of 1 August – 28 February each year.</p>
	<p><b>Construction conditions</b></p>	<p>Any vegetation removal and soil disturbance necessary to install and undertake the activity must be kept to a minimum. No native vegetation is to be disturbed without obtaining prior consent from the Grantor.</p> <p>The surface of the ground must be reinstated in a tidy manner following installation works.</p> <p>The Concessionaire must ensure that all machinery, tools and equipment used in undertaking the Concession Activity is steamed cleaned and weed free prior to being taken onto the Land.</p> <p>The Concessionaire must ensure that all gravel and other materials used in undertaking the Concession Activity are from a weed free source.</p> <p>That, prior to construction, the Concessionaire must:</p> <p>(a) In the case of an easement, mark the centre line of the easement on the ground, for the approval of the Grantor; and the Concessionaire must use best endeavours to conform to that approved route. Any deviation or variance from the approved route requires the prior written consent from the Grantor. For the avoidance of doubt, at any</p>

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Attachment A) Example special conditions for concessions

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		<p>point the easement width must not exceed a width greater than <b>abc</b> metres.</p> <p>(b) Provide to the Grantor for approval, a work plan detailing the contractors to be used, commencement dates, timelines, construction methods and standards.</p> <p>(c) Prepare an annual maintenance programme for the approval of the Grantor.</p> <p>(d) The Concessionaire must implement an on-going weed control programme to the satisfaction of the Grantor, to keep the Land free from all introduced weeds, resulting from the Concessionaire's use of the Land.</p>
	<p><b>Waste, fuels and hazardous substances</b></p>	<ol style="list-style-type: none"> <li>1. Any waste or rubbish, including organic waste, must be contained, separated at source if recyclable, placed in a designated area, removed and disposed of in an appropriate manner / at an authorised facility at regular intervals/weekly and on completion of the activity to ensure it does not become a contaminant or present a potential hazard to wildlife.</li> <li>2. The Concessionaire will comply with all Hazardous Substances and New Zealand Organisms Act 1996 (HSNO) regulations and requirements for the storage of hazardous substances, including fuel:  <a href="http://www.business.govt.nz/worksafe/information-guidance/guidance-by-industry/hsno">http://www.business.govt.nz/worksafe/information-guidance/guidance-by-industry/hsno</a>. Storing greater than 50 litres of petrol will require approval from the Grantor.</li> <li>3. The Concessionaire will ensure than any refuelling, lubrication and/or maintenance and mechanical repairs on any machinery are undertaken in</li> </ol>

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Attachment A) Example special conditions for concessions

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		<p>an appropriate area where any spillages can be contained. No refuelling is to take place within 10m of any waterway.</p> <p>4. In the event of any hazardous substance spill the Concessionaire must:</p> <ul style="list-style-type: none"> <li>(f) Take all practicable measures to stop the flow of the substances and prevent further contamination of Land or water; and</li> <li>(g) Immediately contain, collect and remove the hazardous substances and any contaminated material, and dispose of all such material in an appropriate manner / at an authorised facility; and</li> <li>(h) Notify the Grantor as soon as practicable; and</li> <li>(i) Undertake any remedial action to restore any damage to the soil; and</li> <li>(j) Take all measures to prevent any reoccurrence.</li> </ul> <p>5. The Concessionaire is not permitted to light any open fires on the Land.</p>
	<p><b>Notification of works</b></p>	<p>1. The concessionaire will, at least 7 days prior to undertaking works on Public Conservation Land, inform the XXX District Office at xxxx@doc.govt.nz of the date, duration and location of the proposed works.</p>

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## DEPARTMENT OF CONSERVATION – SECTION 78 CONDITIONS – CONCESSIONS

### Guidance note

The Fast-track Approvals Act 2024 (FTAA) empowers independent panels to grant approvals that may create Crown liabilities in relation to concessions, land exchanges and access arrangements.

Section 78 of the FTAA enables the Minister of Conservation to set standard conditions that can be used to manage risks to, and potential liabilities of, the Crown arising from the granting of these fast-track approvals.

These risks and liabilities (including financial) include those under the Health and Safety at Work Act 2015, Occupiers' Liability Act 1962 and Building Act 2004.

This document contains the section 78 conditions that can be specified by the Department in relation to **concessions**. The conditions are grouped by the area of risk or liability they would manage.

If the Department specifies section 78 conditions to the panel, the panel *must* impose those conditions on the concession if an approval is granted.

The Department will carefully consider Crown risk and liability issues to inform the use of section 78 conditions. Not all section 78 conditions will need to be applied to every project (nor will every project necessarily require section 78 conditions). If the Department is satisfied that proposed conditions adequately manage any risk or liability, it is unlikely to seek additional/different conditions. However, where risks and liabilities aren't adequately managed in the Department's view, it is likely to require section 78 conditions be imposed.

The Department is committed to working collaboratively with applicants and encourages applicants to engage on conditions as part of the pre-lodgement consultation process.

# Concessions

## **Health and safety**

### **1. Health and safety plan**

- 1.1. The Concessionaire must exercise the rights granted by this Concession in a safe and reliable manner and must comply with the Health and Safety at Work Act 2015 and its regulations and all other provisions or requirements of any competent authority relating to the exercise of this Concession.
- 1.2. The Concessionaire must create a comprehensive and suitable health and safety management plan (**Safety Plan**) to address all aspects of the Concession Activity and must provide a copy of it to the Minister prior to commencing the Concession Activity.
- 1.3. Prior to any Concession Activity taking place, the Concessionaire must:
  - 1.3.1. Have its Safety Plan audited by a suitably qualified person approved by the Minister and forward to the Minister a certificate from the auditor certifying that the plan is suitable for the Concession Activity.
  - 1.3.2. The Concessionaire must obtain from the auditor details as to when the Safety Plan is to be re-audited. The Concessionaire must comply with any such requirement to re-audit and forward a copy of the re-audit certificate to the Minister within 5 working days of the certificate being issued.
- 1.4. For any Concession Activity that is subject to the Health and Safety at Work (Adventure Activities) Regulations 2016, proof of registration with WorkSafe New Zealand will satisfy the audit requirements under this clause.
- 1.5. If the Concessionaire amends or replaces the audited Safety Plan then, before the amendment or replacement Safety Plan takes effect, the Concessionaire must comply with the audit requirements of this clause.
- 1.6. The Minister may request the Concessionaire to provide the Minister with a copy of the current Safety Plan at any time, in which case the Concessionaire must provide the copy within 10 working days of receiving the request.
- 1.7. The Minister's receipt of a Safety Plan does not in any way limit the obligations of the Concessionaire related to health and safety or otherwise and is not to be construed as implying any responsibility or liability on the part of the Minister.
- 1.8. The Concessionaire must comply with the Safety Plan, and with any safety directions of the Minister.

### **2. Health and safety obligations**

- 2.1. The Concessionaire must:
  - 2.1.1. Notify the Minister of any natural events or activities on the Land or the surrounding area that may endanger the public or the environment.
  - 2.1.2. Take all reasonably practicable steps to protect the safety of all persons present on the Land affected by the Concession Activity.
  - 2.1.3. Where necessary, erect signposts warning the public of any dangers they may encounter because of the Concessionaire's operations.

- 2.1.4. Take all reasonably practicable steps to eliminate any dangers to the public arising from the Concession Activity and clearly and permanently mark any that remain and of which the Concessionaire is aware.
- 2.1.5. Report to the Minister all accidents involving a notifiable event reportable to WorkSafe in accordance with the Safety Plan and applicable legislation, within 24 hours of their occurrence, and must forward an investigation report to the Minister within 3 days of the event occurring.
- 2.1.6. Provide to the Minister a complete copy of the internal investigation report resulting from notifiable health or safety events within 60 days of the event's occurrence.
- 2.1.7. Provide to the Minister, at the Minister's request, any weekly or monthly reports generated by the Concessionaire and derived from the Concessionaire's accident reporting database.
- 2.1.8. Ensure that all contracts between the Concessionaire and any contractors contain, at a minimum, the same health and safety requirements as this Concession.
- 2.1.9. Be satisfied that facilities or equipment provided by the Minister to enable the Concession Activity to be carried out meets the safety requirements of the Concessionaire.
- 2.1.10. Not bring onto the Land or any land administered by the Department of Conservation any dangerous or hazardous material or equipment that is not required for purposes of the Concession Activity; and if such material or equipment is required and approved as part of the Concession Activity, the Concessionaire must take all practicable steps to ensure that the material or equipment is treated with due and proper care.

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## **Bonds and guarantees**

### **3. Bond**

- 3.1. Before commencing the Concession Activity, the Concessionaire must provide either in cash; or as a surety from a trading bank, insurance company or bond guarantor, a bond set in accordance with this clause.
- 3.2. If a surety is the Concessionaire's preferred option, the surety must execute in favour of, and on terms acceptable to, the Minister, a bond for performance by the Concessionaire to the obligations under the Concession.
- 3.3. The Minister will set the bond or surety amount following an independent risk assessment using a methodology set by the Minister.
- 3.4. The bond or surety amount may be reviewed at the discretion of the Minister at any time. Such review is to follow an independent risk assessment using a methodology set by the Minister.
- 3.5. The cost of any independent risk assessment or review must be paid by the Concessionaire within 10 working days of being given a notice by the Minister.
- 3.6. Notwithstanding the variation (including as to term), expiry, surrender, or termination of the Concession, the bond is to remain in full force and effect until such time as all the Concessionaire's obligations under the Concession have been complied with to the satisfaction of the Minister.
- 3.7. If the Concessionaire breaches or fails to carry out any condition of the Concession, or in carrying out the Concession Activity there arise adverse effects not authorised or reasonably foreseen in the Concession, the Minister may call on the bond under this Concession or any portion of it to ensure compliance with the conditions or to remedy or mitigate those adverse effects.

### **4. Guarantee**

- 4.1. In consideration of the Minister entering into this Concession at the Guarantor's request the Guarantor:
  - 4.1.1. Guarantees payment of the Concession Fee and the performance by the Concessionaire of the covenants in this Concession.
  - 4.1.2. Indemnifies the Minister against any loss the Minister might suffer should the Concession be lawfully disclaimed or abandoned by any liquidator, receiver or other persons.
- 4.2. The Guarantor covenants with the Minister that:
  - 4.2.1. No release, delay, or other indulgence given by the Minister to the Concessionaire, to the Concessionaire's successors or assigns, or any other thing whereby the Guarantor would have been released had the Guarantor been merely a surety, is to release, prejudice, or affect the liability of the Guarantor as a Guarantor or as indemnifier.
  - 4.2.2. As between the Guarantor and Minister the Guarantor may, for all purposes, be treated as the Concessionaire and the Minister is under no obligation to take proceedings against the Concessionaire before taking proceedings against the Guarantor.

- 4.2.3. The guarantee is for the benefit of and may be enforced by any person entitled for the time being to receive the Concession Fee.
- 4.2.4. Any assignment or other variation (including amendments to the term) of this Concession and any Concession Fee review in accordance with this Concession, are not to release the Guarantor from liability.
- 4.2.5. Should there be more than one Guarantor the liability of each Guarantor under this Guarantee is to be joint and several.

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## **Structures, Building Act, and restoration**

### **5. New structures and land alterations**

The Concessionaire must not erect, alter, or bring onto the Land any structure, or alter the land in any way that is not specifically authorised by this Concession, without the prior approval of the Minister, and may be given subject to any reasonable terms and conditions, as the Minister considers appropriate in the Minister's sole discretion under this clause.

- 5.1. The Concessionaire must, on request of the Minister, submit written engineering or building plans and details to the Minister for approval before:
  - 5.1.1. Erecting a new structure or altering any structure on the Land.
  - 5.1.2. Altering the Land in any way.

### **6. Removal of structures or other improvements**

- 6.1. On expiry or termination of this Concession either as to all or part of the Land, the Concessionaire may with the Minister's written consent, or must if the Minister gives written notice, remove any specified structures and other improvements on the Land.
- 6.2. Removal under this clause must occur within a time specified by the Minister.
- 6.3. The Concessionaire is to make good any damage done as part of the removal and must leave the Land and any other public conservation land affected by the removal in the same condition as it was at the beginning of the Term.
- 6.4. The Concessionaire is not entitled to compensation from the Minister for any structures or other improvements placed or carried out by the Concessionaire on the Land.

### **7. Building Act compliance**

- 7.1. Where a building warrant of fitness under the Building Act 2004 is required, the Concessionaire must display a copy of the relevant certificate showing the location of the compliance schedule in each building on the Land, in a place to which users of the building have ready access.
- 7.2. The Concessionaire must keep and maintain all building systems and any structures on the Land in accordance with the requirements of any compliance schedule.
- 7.3. The Concessionaire must retain and make available to any territorial authority and any other person with a right to inspect any structures on the Land under the Building Act 2004 a copy of the compliance schedule, together with the written reports relating to compliance with the compliance schedule over the previous two-year period.

### **8. Rehabilitation and Closure Plan**

- 8.1. The Concessionaire must prepare, implement, and comply with a Rehabilitation and Closure Plan approved by the Minister.
- 8.2. The Rehabilitation and Closure Plan must:

- 8.2.1. Be prepared by suitably qualified persons and in consultation with the Minister.
- 8.2.2. Integrate with any other plans required under this Concession.
- 8.2.3. Describe how the Concessionaire will manage rehabilitation on the Land during the Term.
- 8.2.4. Be approved by the Minister prior to the commencement of the Concession.
- 8.3. As a minimum, the Rehabilitation and Closure Plan must address the following:
  - 8.3.1. Areas of the Land requiring rehabilitation (being all disturbed areas, accessways and overburden/vegetation storage areas).
  - 8.3.2. Rehabilitation objectives, timeframes, and methods.
  - 8.3.3. Contouring, maximum slope angles, and stability of all final engineered landforms.
  - 8.3.4. Biosecurity responses (e.g. pest plant and animal control).
  - 8.3.5. Protection of slope stability, water, and soils from the effects of erosion.
  - 8.3.6. Water quality limits for discharges from the Land following removal of active water treatment.
  - 8.3.7. Removal of buildings, structures, tracks, and equipment from the Land.
- 8.4. The Minister may request a review of the Rehabilitation and Closure Plan and may require the Concessionaire to amend the plan at any time. The Concessionaire will implement and comply with any amendments to the plan approved by the Minister. The Minister may, at the cost of the Concessionaire, seek advice from an appropriate expert as part of any such approval.

## **9. Property of the Minister**

- 9.1. The Concessionaire must take reasonable and proper care not to damage any property of the Minister and must promptly repair any such damage.

## **Fees**

### **10. Concession Fee**

- 10.1. The fee for the Concession (Concession Fee), made up of any combination of rents, fees, and royalties, is to be set by the Minister after obtaining advice of a registered valuer appointed by the Minister. The registered valuer will determine the market value of the Concession Activity carried out on the Land having regard to the matters in section 17Y of the Conservation Act 1987.
- 10.2. The Concessionaire must pay the Concession Fee to the Minister, in the manner directed by the Minister, on or before the Concession Fee Payment Date, which is annually on the anniversary of the Term, with the first payment due at the start of the Term.
- 10.3. If the Concessionaire fails to pay within 14 days of the Concession Fee Payment Date, then the Concessionaire is to pay interest on the unpaid Concession Fee from the Concession Fee Payment Date until the date of payment at a penalty interest rate of 15%.
- 10.4. The Concession Fee excludes any payments required by the Minister in accordance with section 17ZH of the Conservation Act 1987, which are to be paid from time to time in accordance with the Minister's instructions.

### **11. Concession Fee review**

- 11.1. The Minister will commence a review of the Concession Fee at intervals in accordance with section 17Y of the Conservation Act.
- 11.2. The new Concession Fee, made up of any combination of rents, fees, and royalties, will be determined by the Minister after obtaining advice of a registered valuer appointed by the Minister. The registered valuer must determine the market value of the Concession Activity carried out on the Land, having regard to the matters in section 17Y of the Conservation Act 1987.

### **12. Other charges**

- 12.1. The Concessionaire must pay all levies, rates, and other charges, including utility charges payable in respect of the Land or for the services provided to the Land that relate to the Concessionaire's use of the Land or the carrying on of the Concession Activity.
- 12.2. The Minister is not liable for any cost incurred in reestablishing the supply of any utilities to the Land in the event it becomes unavailable for any reason.
- 12.3. Where the Minister pays any such levies, rates, or other charges, the Concessionaire must on receipt of an invoice from the Minister pay such sum to the Minister within 14 days of receiving the invoice. If payment is not made within the 14 days, then the Concessionaire is to pay interest on the unpaid sum from the date payment was due until the date of payment at a penalty interest rate of 15%.

### **13. Costs**

- 13.1. The Concessionaire must pay the Minister's legal costs and expenses of and incidental to preparing and signing this Concession or any extension or variation of it, other

than those costs already recovered by the Minister under the Fast-track Approvals Act 2024.

- 13.2. The Concessionaire must pay to the Minister all costs associated with applications for approvals under this Concession determined at the standard rates then applying in the Department of Conservation for cost recovery.
- 13.3. The Concessionaire must pay in full immediately and on demand all costs and fees (including solicitor's costs and fees of debt collecting agencies engaged by the Minister) arising out of and associated with steps taken by the Minister to enforce or attempt to enforce the Minister's rights and powers under this Concession including the right to recover outstanding money owed to the Minister.

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## **Liability and insurance**

### **14. Liabilities**

- 14.1. The Concessionaire agrees to use the Land at the Concessionaire's own risk and releases to the full extent permitted by law the Minister and the Minister's employees and agents from all claims and demands of any kind and from all liability that may arise in respect of any accident, damage, or injury occurring to any person or property on or about the Land.
- 14.2. The Concessionaire indemnifies the Minister against all claims, actions, losses, and expenses of any nature that the Minister may suffer or incur or for which the Minister may become liable arising from the Concessionaire's performance of the Concession Activity.
- 14.3. This indemnity continues after the expiry or termination of this Concession in respect of any acts or omissions occurring or arising before its expiry or termination.
- 14.4. The Concessionaire is responsible for the acts and omissions of its employees, contractors, agents, clients and invitees (excluding other members of the public accessing the Land).
- 14.5. The Minister is not liable and does not accept any responsibility for damage to or interference with the Land, the Concession Activity, or to any structures, equipment, or facilities on the Land or any other indirect or consequential damage or loss due to any natural disaster, vandalism, sabotage, fire, or exposure to the elements except where such damage or interference is caused by any wilful act or omission of the Minister, the Minister's employees, agents, or contractors.
- 14.6. Where the Minister is found to be liable in accordance with this clause, the total extent of the Minister's liability is limited to \$1,000,000 in respect of the Concessionaire's structures, equipment, and facilities.
- 14.7. Despite anything else in this clause, neither the Minister nor the Concessionaire are liable for any indirect or consequential damage or loss howsoever caused.

### **15. Insurance**

- 15.1. Without prejudice to or in any way limiting its liability under this Concession, the Concessionaire at the Concessionaire's expense must take out and keep current policies for insurance with a substantial and reputable insurer in the types and amounts determined in accordance with this clause.
- 15.2. The Minister will set the initial types and amounts of insurance required following an independent assessment using a methodology set by the Minister.
- 15.3. After every three year period of the Term the Minister may, on giving 10 working days' notice to the Concessionaire, alter the types and amounts of insurance required, following an independent assessment using a methodology set by the Minister. On receiving such notice, the Concessionaire must within 10 working days take out and keep current policies for insurance and for the amounts not less than the sums specified in that notice.
- 15.4. The Concessionaire must provide to the Minister within 5 working days of the Minister so requesting:

- 15.4.1. Details of any insurance policies required to be obtained under this Concession, including any renewal policies if such renewal occurs during the Term.
- 15.4.2. A copy of the current certificate of such policies.

**16. Bankruptcy or insolvency**

- 16.1. If the Concessionaire becomes bankrupt, insolvent, has a receiving order made against it, is wound up, or otherwise ceases to function, or carries on its business under a receiver for the benefit of creditors, the Minister may either:
  - 16.1.1. Terminate this Concession by notice in writing to the Concessionaire or to the receiver, liquidator, or any person in whom the Concession may become vested. Any such notice does not release the Concessionaire from liability in respect of any breach of this Concession prior to termination or that survives termination.
  - 16.1.2. Give such receiver, liquidator, or other person the option of continuing the Concession subject to the provision of a guarantee by one or more guarantors of any bond given on terms acceptable to the Minister for the due and faithful performance of the Concession.

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## **Compliance**

### **17. Minister's right to remedy defaults**

- 17.1. The Minister may at any time elect to remedy any default by the Concessionaire under this Concession.
- 17.2. Before electing to remedy any default in accordance with this clause, the Minister must, if practicable, first give the Concessionaire notice of the default and a reasonable opportunity to remedy the default.
- 17.3. The Concessionaire must pay to the Minister immediately on demand all reasonable costs and expenses incurred by the Minister, including legal costs and expenses as between solicitor and client, in remedying such default. The Concessionaire is to pay interest on such costs and expenses if payment is not made within 14 days of the Minister's demand, from the date of the demand until the date of payment, at a penalty interest rate of 15%.

### **18. Compensation for unauthorised disturbance**

- 18.1. The Minister may require the Concessionaire to pay additional compensation for any breaches of this Concession that impact adjoining or proximate land administered by the Department of Conservation. Such additional compensation will be for an amount solely determined by the Minister acting reasonably and must be paid by the Concessionaire immediately on demand.

### **19. Suspension of the Concession**

- 19.1. If, in the Minister's opinion, there is a temporary risk to public safety arising from natural events such as earthquake, land slip, volcanic activity, flood, or in any other way, whether or not from any breach of the terms of this Concession on the part of the Concessionaire, then the Minister may suspend this Concession.
- 19.2. Where the Concessionaire has breached any terms of this Concession, the Minister may suspend the Concession for such period as the Minister determines.
- 19.3. The Minister may suspend this Concession while the Minister investigates any of the circumstances contemplated in this clause. Investigation referred to in this clause includes the laying of charges and awaiting the decision of the Court.
- 19.4. During any period of temporary suspension, the Concession Fee payable by the Concessionaire is to abate in fair proportion to the loss of use of the Land by the Concessionaire.
- 19.5. The Minister is not liable to the Concessionaire for any loss sustained by the Concessionaire because of the suspension of the Concession under this clause, including loss of profits.

### **20. Termination of the Concession**

- 20.1. The Minister may terminate this Concession either in whole or in part:
  - 20.1.1. By 14 days' notice to the Concessionaire if the Concession Fee or any other money payable to the Minister under this Concession is in arrears and

unpaid for 14 days after any of the days appointed for payment whether it has been lawfully demanded or not.

- 20.1.2. By 14 days' notice to the Concessionaire or such sooner period as it appears necessary and reasonable to the Minister if:
- a. The Concessionaire breaches any terms of this Concession, or any plan or other agreement associated with this concession, and in the Minister's sole opinion the breach can be rectified; and
  - b. The Minister has notified the Concessionaire of the breach; and
  - c. The Concessionaire does not rectify the breach within 7 days of receiving notification.
- 20.1.3. By notice in writing to the Concessionaire where the Concessionaire breaches any term of this Concession, or any plan or other agreement associated with this concession, and in the sole opinion of the Minister the breach is not capable of being rectified.
- 20.1.4. By notice in writing to the Concessionaire if the Concessionaire ceases to conduct the Concession Activity or, in the reasonable opinion of the Minister, the conduct of the Concession Activity is manifestly inadequate; or
- 20.1.5. By notice in writing to the Concessionaire if the Concessionaire is convicted of an offence under the Conservation Act 1987 or any of the Acts listed in the First Schedule to that Act or any statute, ordinance, regulation, bylaw, or other enactment affecting or relating to the Land or which in the Minister's sole opinion affects or relates to the Concession Activity; or
- 20.1.6. By notice in writing to the Concessionaire if the Concessionaire or the Guarantor is dissolved; or enters into any composition with or assignment for the benefit of its creditors; or is adjudged bankrupt; or being a company, has a receiver appointed; or is put into liquidation; or is placed under statutory management; or has a petition for winding up presented against it; or is otherwise unable to pay its debts as they fall due; or the estate or interest of the Concessionaire is made subject to a Writ of Sale or charging order; or the Concessionaire ceases to function or operate; or
- 20.1.7. Immediately and without notice if there is, in the opinion of the Minister, a permanent risk to public safety whether arising from the conduct of the Concession Activity or from natural causes such as earthquake, land slip, volcanic activity, flood, or arising in any other way, whether or not from any breach of the terms of this Concession on the part of the Concessionaire.
- 20.2. The Minister may exercise the Minister's right under this clause to terminate the Concession notwithstanding any prior waiver or failure to act by the Minister or any indulgence granted by the Minister for any matter or default.
- 20.3. Termination of the Concession does not prejudice or affect the accrued rights or claims and liabilities of the parties.

## **21. Monitoring**

- 21.1. Provided reasonable notice has been given to the Concessionaire, the Minister, its employees, and contractors may enter the Land to:

- 21.1.1. Inspect the Land and facilities on or within the Land and to monitor compliance with this Concession. Monitoring may include the taking of samples and photographs.
- 21.1.2. Do any work necessary for the exercise of the Minister of Conservation's functions and powers in respect of the Land, provided that such work will not unnecessarily interfere with the Concessionaire's rights under this Concession.

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**Miscellaneous****22. Heritage**

- 22.1. The Concessionaire must take reasonable care to comply with the Heritage New Zealand Pouhere Taonga Act 2014.

**23. Supply of services**

- 23.1. Nothing contained or implied in this Concession requires the Minister or the Concessionaire to supply services on or under the Land or entitles the Concessionaire to interfere with the services of any other user of the Land.

**24. Variations**

- 24.1. The Minister, after first consulting with the Concessionaire, may on each Concession Fee Review Date, delete, add, or vary any condition of this Concession to make the condition more effective in addressing potential liability of the Minister resulting from the Concession Activity. Nothing in this clause affects the Minister's rights to vary the Concession under section 17ZC of the Conservation Act 1987.

**25. Occupation beyond the Term**

- 25.1. If the Minister permits the Concessionaire to remain in occupation of the Land after the expiry or earlier termination of the Term, the occupation is to be on the basis:
- 25.1.1. Of a month-to-month arrangement only, terminable at one month's notice by either party.
  - 25.1.2. At the Concession Fee then payable.
  - 25.1.3. Otherwise on the same terms and conditions as expressed or implied in this Concession.





**From:** [REDACTED]@santanaminerals.com>  
**Sent:** Thursday, 9 October 2025 10:48 am  
**To:** Marie Payne; Carl Jones; John Roberts; Meg Embleton-Muir; Pene Williams; Jenni Fitzgerald; [REDACTED] [REDACTED]  
**Subject:** Re: Bendigo Ophir Gold Project- Concessions discussion- DoC and MGL

Hi Marie,

Yes absolutely, we can discuss those topics first. We are flexible tomorrow, so please let me know if there is anything else that you wish to discuss first.

Kind regards,

[REDACTED]

---

**From:** Marie Payne <mpayne@doc.govt.nz>  
**Sent:** Thursday, October 9, 2025 10:33 AM  
**To:** [REDACTED]@santanaminerals.com>; Carl Jones <cjones@doc.govt.nz>; John Roberts <jroberts@doc.govt.nz>; Meg Embleton-Muir <memuir@doc.govt.nz>; Pene Williams <pwilliams@doc.govt.nz>; Jenni Fitzgerald <jefitzgerald@doc.govt.nz>; [REDACTED] [REDACTED]@mitchelldaysh.co.nz>; [REDACTED]@santanaminerals.com>  
**Subject:** RE: Bendigo Ophir Gold Project- Concessions discussion- DoC and MGL

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Hey [REDACTED]

Do you have an agenda for tomorrow, we have a couple of people attending that will primarily be focused on the proposal to revoke the broader covenant and the Come in Time proposal. If possible, could topics be discussed first up as they might not stay for the entirety.

Kind regards,

Marie

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: [REDACTED]



# Department of Conservation

## *Te Papa Atawhai*

-----Original Appointment-----

**From:** s9(2)(a)@santanaminerals.com>

**Sent:** Tuesday, 23 September 2025 11:54 am

**To:** s9(2)(a) Carl Jones; John Roberts; Meg Embleton-Muir; Marie Burton; Pene Williams; Jenni Fitzgerald; s9(2)(a); s9(2)(a)

**Subject:** Bendigo Ophir Gold Project- Concessions discussion- DoC and MGL

**When:** Friday, 10 October 2025 10:00 am-12:00 pm (UTC+12:00) Auckland, Wellington.

**Where:** Cromwell Boardroom (NZ)

Hi all,

An opportunity to discuss the concessions that Matakanaui Gold Limited will be applying for as part of our Fast Track Application.

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**Microsoft Teams** [Need help?](#)

[Join the meeting now](#)

s9(2)(k)

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**From:** Carl Jones  
**Sent:** Thursday, 9 October 2025 8:26 am  
**To:** Marie Payne  
**Subject:** RE: Concessions Bendigo pre-meeting

Ok Marie, I'll convey to the other team that I have a prior commitment.

Ngā mihi (*with thanks*)

**Carl Jones**

Senior Permissions Advisor | Kaitohutohu Whakaaetanga

Hokitika Shared Service Centre - *Te Wahanga Ratonga Pokapu o Hokitika*  
10 Sewell Street, Hokitika 7810  
Department of Conservation - Te Papa Atawhai

s9(2)(a)

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**From:** Marie Payne <mpayne@doc.govt.nz>  
**Sent:** Thursday, 9 October 2025 8:21 am  
**To:** Carl Jones <cajones@doc.govt.nz>  
**Subject:** RE: Concessions Bendigo pre-meeting

Hey Carl,

That's all good re skipping the meeting later on today.

Given tomorrow is a concessions workshop with the applicant and planned for a while I think we need a permissions advisor to be present to answer any specific questions etc...do you have any flexibility to be available for the full 2hrs tomorrow? I also appreciate the competing priorities for everyone at the moment.

Kind regards,

**Marie Payne**

Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

-----Original Appointment-----

**From:** Carl Jones <cajones@doc.govt.nz>  
**Sent:** Thursday, 9 October 2025 8:17 am

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**To:** Marie Payne

**Subject:** Accepted: Concessions Bendigo pre-meeting

**When:** Thursday, 9 October 2025 9:15 am-10:00 am (UTC+12:00) Auckland, Wellington.

**Where:** WGN - G.05 Totorore (Seats 4, Full AV); WGN - 1.03 Hoiho (Seats 12, Full AV)

Hi Marie,

Happy to attend this so long as I can skip the general meeting later. Also. I can only spare an hour for tomorrow's meeting. Out of scope

Out of scope

Cheers

Carl

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**From:** Max Crowe <max@fieldlab.nz>  
**Sent:** Monday, 6 October 2025 3:40 pm  
**To:** Sally Clarkson  
**Subject:** Re: FW: Bendigo-Ophir Gold Project

Hi Sally,

Thank you for the update. I understand that the buffers are included in the "aggregated footprint." However, to fully assess the project, I still need clarification on the specific locations and sizes of these buffers within that aggregated footprint, especially given that some areas have no buffer while others have a 50m buffer. I would appreciate it if they could provide this information.

Ngā mihi,  
Max

On Mon, Oct 6, 2025 at 8:37 AM Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)> wrote:

Morena Max,

This is what has come back from [REDACTED] regarding your query around the buffers. Apparently, the disturbance footprint includes all buffers.

Regards  
Sally

---

**From:** [REDACTED] <[\[REDACTED\]@santanaminerals.com](mailto:[REDACTED]@santanaminerals.com)>  
**Sent:** Thursday, 2 October 2025 8:46 am  
**To:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Subject:** Re: Bendigo-Ophir Gold Project

Hi Sally,

All buffers have been included within the disturbance aggregated footprint. I.e. That footprint is the extent of our total disturbance, including buffers.

Many thanks,

[REDACTED]

---

**From:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Sent:** Monday, September 29, 2025 3:04 PM  
**To:** [REDACTED] <[\[REDACTED\]@santanaminerals.com](mailto:[REDACTED]@santanaminerals.com)>  
**Subject:** RE: Bendigo-Ophir Gold Project

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unexpected email.

Thanks for sending through [REDACTED] much appreciated.

Our botanist has noted that:

*Both the wetland and vegetation values assessments refer to the project impact area as including... "buffers of between 50 and 0 m", however the location and extent of these calculated buffers have not been provided. I'm seeking more information on the location and size of those buffers.*

Is there a GIS shape file for the above?

Thanks

Sally

---

**From:** [REDACTED] <[REDACTED]@santanaminerals.com>

**Sent:** Wednesday, 24 September 2025 1:33 pm

**To:** Sally Clarkson <sclarkson@doc.govt.nz>

**Cc:** Marie Burton <mnavne@doc.govt.nz>; [REDACTED] <[REDACTED]@santanaminerals.com>; [REDACTED] <[REDACTED]@santanaminerals.com>

**Subject:** Re: Bendigo-Ophir Gold Project

Hi Sally,

Thanks for your email. Please see attached the GIS spatial data of our disturbance aggregated footprint, as requested.

With regards to the stages of land disturbance - I have attached an updated project description for your reference- if you refer to section 3.24, it discusses the project

timeframes and has a breakdown of the different stages with maps, which should answer your questions.

Kind regards,

s9(2)(a)

---

**From:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Sent:** Tuesday, September 23, 2025 5:09 PM  
**To:** s9(2)(a) <[REDACTED]> <[\[REDACTED\]@santanaminerals.com](mailto:[REDACTED]@santanaminerals.com)>  
**Cc:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Subject:** Bendigo-Ophir Gold Project

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Hi s9(2)(a)

We have had some queries from DOC's internal team involved in this project and I wonder if you are please able to provide responses. I have set the queries out below, relating to both land disturbance/earthworks and GIS files.

#### **Land Disturbance Queries:**

I note that the draft Project Description provided to DOC includes the maximum disturbance footprint as being 'worst-case' scenario (568 ha) but we are wondering if it is possible to provide some further details with regard to the intended disturbance – specifically how land disturbance activities will be staged and the

intended timeframes. If available, areas would also be useful (I have noted some below).

By my reading of the Project Description, land disturbance will be required for the following activities. What have I missed?

- Establishment of the 'early works' activities at the Ardgour Terrace Site – including temporary construction workers accommodation, geology compound; admin buildings; car parking areas; laydown areas etc – 27 ha
- Realignment of a section of Thomson Gorge Rd (to facilitate access to the Ardgour Terrace Site)
- RAS open pit – 64.3 ha (life of mine = 6 years)
- SRX open pit – 15 ha
- Srex open pit – 1 ha
- CIT open pit – 13.8 ha
- Exploration drilling – 0.5-1 ha (staged)
- Shepherd's Valley site including reclamation of section of SV Creek for service corridor – area for processing plant/supporting infrastructure & total area of SV site 23.3 ha – but this may not represent the land disturbance area?
- Tailings Storage Facility – 61 ha
- Shepherds silt pond and seepage collection sump
- Aggregate pits x2 – 3 ha each
- Water supply pipeline
- New and upgraded road access to site
- Haul roads

Could you please send through any information available relating to the staging and timeframes for the land disturbance activities.

#### **GIS Data Request:**

Our vegetation advisor has asked if it would be possible to provide a GIS file of the project site showing the spatial extent of any buffers incorporated into the project footprint?

Please let me know if you have any questions. Your help is greatly appreciated.

Kind regards

Sally

**Sally Clarkson**

Senior Planner Fast Track Applications

Whare Kaupapa Atawhai | Conservation House

18 Manners Street

Te Whanganui-a-Tara | Wellington

*Please note: My work days are Mondays and Tuesdays*



Department of  
Conservation  
*Te Papa Atawhai*

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**From:** Mandy Tocher <mtocher@lizardexpertnz.co.nz>  
**Sent:** Monday, 6 October 2025 3:28 pm  
**To:** Sally Clarkson  
**Subject:** RE: Draft Lizard Management Plan

Hi Sally – yes that timeframe works ok – I think I also need to provide feedback on the concessions – I had planned to do that this week – unless I am too late?

Thanks  
Mandy



LizardExpertNZ

**Mandy Tocher**  
*B.Sc., M.Sc. (Hon), Ph.D., M.Plan. (Dist).*  
*RMA hearings commissioner*  
Herpetologist

s9(2)(a)

[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz) Email

[www.lizardexpertnz.co.nz](http://www.lizardexpertnz.co.nz) Web

[www.facebook.com/lizardexpertNZ](https://www.facebook.com/lizardexpertNZ) Follow Me



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**From:** Sally Clarkson <sclarkson@doc.govt.nz>  
**Sent:** Monday, 6 October 2025 3:07 pm  
**To:** Mandy Tocher <mtocher@lizardexpertnz.co.nz>  
**Subject:** RE: Draft Lizard Management Plan

Thanks Mandy.

In the next week or so? If that works for you.

Thanks  
Sally

---

**From:** Mandy Tocher <mtocher@lizardexpertnz.co.nz>  
**Sent:** Monday, 6 October 2025 12:18 pm  
**To:** Sally Clarkson <sclarkson@doc.govt.nz>; Marie Payne <mpayne@doc.govt.nz>  
**Cc:** Darcy Liddell <diddell@doc.govt.nz>  
**Subject:** RE: Draft Lizard Management Plan

Hi Sally – yes I can – is there a particular date you require this by?  
Thanks  
Mandy

Released Under the Official Information Act



LizardExpertNZ

**Mandy Tocher**

*B.Sc., M.Sc. (Hon), Ph.D., M.Plan. (Dist).*  
RMA hearings commissioner  
Herpetologist

s9(2)(a)

Cell

[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz) Email

[www.lizardexpertnz.co.nz](http://www.lizardexpertnz.co.nz) Web

[www.facebook.com/lizardexpertNZ](https://www.facebook.com/lizardexpertNZ) Follow Me



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**From:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>

**Sent:** Monday, 6 October 2025 10:48 am

**To:** Mandy Tocher <[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz)>; Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Cc:** Darcy Liddell <[dliddell@doc.govt.nz](mailto:dliddell@doc.govt.nz)>

**Subject:** RE: Draft Lizard Management Plan

Hi Mandy

Apologies for the double-up, I'm not sure if Marie has already responded.

No, we don't have a copy of the overall AEE or the Assessment of Ecological Effects I'm afraid.

Apart from noting, the LMP is 'token' can you provide any other feedback at this stage? Or is that difficult given that we don't have the AEE etc.

Thanks

Sally

---

**From:** Mandy Tocher <[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz)>

**Sent:** Thursday, 2 October 2025 10:35 am

**To:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Cc:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>; Darcy Liddell <[dliddell@doc.govt.nz](mailto:dliddell@doc.govt.nz)>

**Subject:** Re: Draft Lizard Management Plan

Hi Marie- thanks- it refers for detail to the aee- do we have that ? It's a token Imp unfortunately. I can't access the folder again - have let Roger know. Thanks

Mandy

Sent from my iPhone 14 pro

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On 2 Oct 2025, at 9:21 AM, Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)> wrote:

Hey both,

Just FYI the draft LMP got sent through – Mandy has it and I put the file in the teams channel and updated the document register. Not sure if it also needs adding to our feedback chart Sally?

Darcy, I can't imagine you get into the detail of this but likely liaise with Mandy – we have found to date the management plans often contain a lot of information to meet the requirements of Schedule 7 FTAA.

Any questions please let me know.

Kind regards,

Marie

**Marie Payne**

Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)

<[image002.png](#)>

---

**From:** s9(2)(a) <[s9\(2\)\(a\)](mailto:span style=)@santanaminerals.com>

**Sent:** Wednesday, 1 October 2025 10:50 am

**To:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>; Mandy Tocher <[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz)>; John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>

**Cc:** Matt Baber <[mbaber@allianceecology.co.nz](mailto:mbaber@allianceecology.co.nz)>; s9(2)(a)

s9(2)(a) <[s9\(2\)\(a\)](mailto:span style=)@santanaminerals.com>

**Subject:** Draft Lizard Management Plan

Good morning,

Please find attached draft copy Lizard Management Plan.

Regards

s9(2)(a)

Santana Minerals | Cromwell, NZ

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**From:** Carl Jones  
**Sent:** Friday, 3 October 2025 8:56 am  
**To:** Marie Payne  
**Subject:** RE: Bendigo tasks and questions

Thanks Marie. GIS/Jay will be more accurate. It can then be reviewed by myself and the district.

Ngā mihi (*with thanks*)

**Carl Jones**

Senior Permissions Advisor | Kaitohutohu Whakaaetanga

Hokitika Shared Service Centre - *Te Wahanga Ratonga Pokapu o Hokitika*  
10 Sewell Street, Hokitika 7810  
Department of Conservation - Te Papa Atawhai  
Tel: s9(2)(a)

---

**From:** Marie Payne <mpayne@doc.govt.nz>  
**Sent:** Friday, 3 October 2025 8:53 am  
**To:** Carl Jones <cajones@doc.govt.nz>  
**Subject:** RE: Bendigo tasks and questions

Thanks Carl, and no worries we can work through next week.

Out of scope

s9(2)(h)

From everything I have read to date they will not seek to reinstate the covenant but are seeking to covenant two sanctuaries they are proposing as compensation/offsetting.

With the existing permissions, because we have GIS files I can get their team to do a data pull then pass that to you to work with? Jay Brunson helped us out with this last time, however if you think it might be more straight forward to do it yourself/directly let me know.

Kind regards,

**Marie Payne**

Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)

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Department of Conservation  
*Te Papa Atawhai*

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**From:** Carl Jones <[cajones@doc.govt.nz](mailto:cajones@doc.govt.nz)>  
**Sent:** Friday, 3 October 2025 8:45 am  
**To:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Subject:** RE: Bendigo tasks and questions

Hi Marie,

I'm also team lead this week so even more on than usual! s9(2)(a)

s9(2)(a)

1. Unsure if this is a question or statement. I can do a rough search but this will need to be cross checked by the district.

s9(2)(g)(i)

Nga mihi (*with thanks*)

**Carl Jones**

Senior Permissions Advisor | Kaitohutohu Whakaaetanga

Hokitika Shared Service Centre - *Te Wahanga Ratonga Pokapu o Hokitika*

10 Sewell Street, Hokitika 7810

Department of Conservation - Te Papa Atawhai

Tel: s9(2)(a)

---

**From:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Sent:** Thursday, 2 October 2025 5:11 pm  
**To:** Carl Jones <[cajones@doc.govt.nz](mailto:cajones@doc.govt.nz)>  
**Subject:** Bendigo tasks and questions

Hey Carl,

Hope you are going well.

A few questions/tasks we need to progress in relation to the concessions for Bendigo:

1. We need to identify all existing permissions on PCL that maybe impacted by the proposal e.g. the concession applications we have a rough process for doing this.

s9(2)(g)(i)

Kind regards,

Marie

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

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**From:** Marie Payne  
**Sent:** Thursday, 2 October 2025 4:03 pm  
**To:** Laurence Barea  
**Subject:** RE: Bendigo-Ophir

Thanks Laurence,

I was actually just about to email you!

My two key questions from an initial look are:

- How would DOC link this in with the heritage and recreational elements to compensation – particularly given heritage is considered a highly significant conservation value here due to the existing covenant?
- How does the proposal align with Matt's work – i.e. I assume it follows the same principals?

The applicant has included some details of the compensation package in recently provided documents including a 10 year biodiversity management fund intended for DOC – with an associated numerical figure and some other mitigations e.g. the sanctuaries they mentioned at the wildlife workshop.

Kind regards,

Marie

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Laurence Barea <lbarea@doc.govt.nz>  
**Sent:** Thursday, 2 October 2025 3:56 pm  
**To:** Marie Payne <mpayne@doc.govt.nz>  
**Subject:** FW: Bendigo-Ophir

Hi Marie, here is the estimate for Justyna Giejsztowt from Wildlands to provide advice for the pre-lodgement phase of the Bendigo-Ophir offsets and compensation work under their existing FT contract s9(2)(b)(ii). They will need to provide another for the substantial application phase.

Where do you want to go from here?

Ngā mihi,

I work Monday to Thursday

Dr Laurence Barea

Principal Advisor

Biodiversity Systems and Performance Team

Department of Conservation | Te Papa Atawhai [www.doc.govt.nz](http://www.doc.govt.nz)

s9(2)(a)

---

**From:** Justyna Giejsztowt <[Justyna.Giejsztowt@wildlands.co.nz](mailto:Justyna.Giejsztowt@wildlands.co.nz)>

**Sent:** Thursday, 2 October 2025 3:49 pm

**To:** Laurence Barea <[lbarea@doc.govt.nz](mailto:lbarea@doc.govt.nz)>

**Subject:** RE: Bendigo-Ophir

Kia ora Laurence,

Please see attached our proposal for the Santana Ophir-Bendigo work. Please let me know if there is anything else you need!

Cheers,

Justyna

---

**From:** Laurence Barea <[lbarea@doc.govt.nz](mailto:lbarea@doc.govt.nz)>

**Sent:** Thursday, 2 October 2025 10:48 am

**To:** Justyna Giejsztowt <[Justyna.Giejsztowt@wildlands.co.nz](mailto:Justyna.Giejsztowt@wildlands.co.nz)>

**Subject:** RE: Bendigo-Ophir

That's ok. I had the same issue regarding the reports.

Ngā mihi,

I work Monday to Thursday

Dr Laurence Barea

Principal Advisor

Biodiversity Systems and Performance Team

Department of Conservation | Te Papa Atawhai [www.doc.govt.nz](http://www.doc.govt.nz)

s9(2)(a)

---

**From:** Justyna Giejsztowt <[Justyna.Giejsztowt@wildlands.co.nz](mailto:Justyna.Giejsztowt@wildlands.co.nz)>

**Sent:** Thursday, 2 October 2025 10:10 am

**To:** Laurence Barea <[lbarea@doc.govt.nz](mailto:lbarea@doc.govt.nz)>

**Subject:** RE: Bendigo-Ophir

It's all put together, just sitting with a director for internal signoff. I should be able to get it to you today.

I was able to get together a broad cost estimate for the initial check, but not having any idea how complex the materials are that need to be reviewed, its hard to assess the costs of the full assessment.

Cheers,  
Justyna

---

**From:** Laurence Barea <[lbarea@doc.govt.nz](mailto:lbarea@doc.govt.nz)>  
**Sent:** Thursday, 2 October 2025 10:07 am  
**To:** Justyna Giejsztowt <[Justyna.Giejsztowt@wildlands.co.nz](mailto:Justyna.Giejsztowt@wildlands.co.nz)>  
**Subject:** Bendigo-Ophir

Hi, how are you getting on with a cost estimate for this one?

Ngā mihi,  
**Dr Laurence Barea**  
Principal Advisor  
Biodiversity Systems and Performance Team, Terrestrial Biodiversity Unit - Biodiversity, Heritage and Visitor Group  
Department of Conservation | *Te Papa Atawhai*

s9(2)(a)

I work Monday to Thursday

**Kirikiroa/Hamilton Office**

Level 3, 73 Rostrevor St, Hamilton 3204 | Private Bag 3072, Hamilton 3240, New Zealand

s9(2)(a)



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**From:** Richard Ewans  
**Sent:** Thursday, 2 October 2025 11:37 am  
**To:** s9(2)(a) John Roberts  
**Cc:** s9(2)(a)  
**Subject:** RE: Bendigo Heritage Reserve- DOC land - spring surveys

Hi s9(2)(a) no worries, that's ideal thank you.  
Cheers, Richard

---

**From:** s9(2)(a)@santanaminerals.com>  
**Sent:** Thursday, 2 October 2025 10:33 am  
**To:** John Roberts <jroberts@doc.govt.nz>  
**Cc:** Richard Ewans <rewans@doc.govt.nz>; s9(2)(a)@santanaminerals.com>  
**Subject:** Re: Bendigo Heritage Reserve- DOC land - spring surveys

Hey John, Richard,

Apologies for the delay coming back to you. Thats no problem at all- they (the ecologists) will send you the report/data at the same time they send it to us.

Kind regards,

s9(2)(a)

---

**From:** John Roberts <jroberts@doc.govt.nz>  
**Sent:** Thursday, October 2, 2025 10:22 AM  
**To:** s9(2)(a)@santanaminerals.com>  
**Cc:** Richard Ewans <rewans@doc.govt.nz>  
**Subject:** FW: Bendigo Heritage Reserve- DOC land - spring surveys

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Hi s9(2)(a) a request from Richard our ecologist at this end:

- could we please be sent the data that your ecologists come up with for these surveys
- it specifies this in the permit anyway (Special Conditions 6 and 7)

If your team have any questions on the format etc just have them contact Richard direct – his email is above.

Thanks

John

---

**From:** [REDACTED] <[REDACTED]@santanaminerals.com>  
**Sent:** Wednesday, October 1, 2025 8:59:20 am  
**To:** John Roberts <jroberts@doc.govt.nz>  
**Cc:** [REDACTED] <[REDACTED]@santanaminerals.com>  
**Subject:** Bendigo Heritage Reserve- DOC land - spring surveys

Hi John,

As discussed, we have a group of ecologists here this week doing spring surveys, specifically looking at the cushion-field species to help with our reporting. They are getting through the area we had planned faster than we thought, so will have some spare time this week and were hoping they could access the Bendigo Heritage Reserve on DOC land to survey that, while we have them all here this week.

Our wildlife permit allows us to undertake surveys, but we are meant to give a week's notice. As per our conversation, just confirming you are happy for them to access the land this week? They will be purely doing ecological surveys for reporting purposes, to assist with our studies and the management of the cushionfield.

Many thanks,

[REDACTED]  
s9(2)(a)

s9(2)(a)

Santana Minerals | Cromwell, NZ

s9(2)(a)

W: [www.santanaminerals.com](http://www.santanaminerals.com)



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Released under the Official Information Act

**From:** Marie Payne  
**Sent:** Tuesday, 30 September 2025 3:13 pm  
**To:** Sally Clarkson  
**Subject:** RE: Bendigo-Ophir Gold Project

Hey Sally,

Did you file this / send it on to the project team?

Hope you are feeling a bit better 😊

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** s9(2)(a)@santanaminerals.com>  
**Sent:** Wednesday, 24 September 2025 1:33 pm  
**To:** Sally Clarkson <sclarkson@doc.govt.nz>  
**Cc:** Marie Burton <mpayne@doc.govt.nz>; s9(2)(a)@santanaminerals.com>; s9(2)(a)@santanaminerals.com>  
**Subject:** Re: Bendigo-Ophir Gold Project

Hi Sally,

Thanks for your email. Please see attached the GIS spatial data of our disturbance aggregated footprint, as requested.

With regards to the stages of land disturbance - I have attached an updated project description for your reference- if you refer to section 3.24, it discusses the project timeframes and has a breakdown of the different stages with maps, which should answer your questions.

Kind regards,

s9(2)(a)

---

**From:** Sally Clarkson <sclarkson@doc.govt.nz>  
**Sent:** Tuesday, September 23, 2025 5:09 PM

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To: s9(2)(a)@santanaminerals.com>  
Cc: Marie Payne <mpayne@doc.govt.nz>  
Subject: Bendigo-Ophir Gold Project

**Caution:** This Email is from an EXTERNAL source. Please exercise caution. DO NOT open attachments or click on links from unknown senders or unexpected email.

Hi s9(2)(a)

We have had some queries from DOC's internal team involved in this project and I wonder if you are please able to provide responses. I have set the queries out below, relating to both land disturbance/earthworks and GIS files.

#### Land Disturbance Queries:

I note that the draft Project Description provided to DOC includes the maximum disturbance footprint as being 'worst-case' scenario (568 ha) but we are wondering if it is possible to provide some further details with regard to the intended disturbance – specifically how land disturbance activities will be staged and the intended timeframes. If available, areas would also be useful (I have noted some below).

By my reading of the Project Description, land disturbance will be required for the following activities. What have I missed?

- Establishment of the 'early works' activities at the Ardour Terrace Site – including temporary construction workers accommodation, geology compound; admin buildings; car parking areas; laydown areas etc – 27 ha
- Realignment of a section of Thomson Gorge Rd (to facilitate access to the Ardour Terrace Site)
- RAS open pit – 64.3 ha (life of mine = 6 years)
- SRX open pit – 15 ha
- Srex open pit – 1 ha
- CIT open pit – 13.8 ha
- Exploration drilling – 0.5-1 ha (staged)
- Shepherd's Valley site including reclamation of section of SV Creek for service corridor – area for processing plant/supporting infrastructure & total area of SV

- site 23.3 ha – but this may not represent the land disturbance area?
- Tailings Storage Facility – 61 ha
  - Shepherds silt pond and seepage collection sump
  - Aggregate pits x2 – 3 ha each
  - Water supply pipeline
  - New and upgraded road access to site
  - Haul roads

Could you please send through any information available relating to the staging and timeframes for the land disturbance activities.

**GIS Data Request:**

Our vegetation advisor has asked if it would be possible to provide a GIS file of the project site showing the spatial extent of any buffers incorporated into the project footprint?

Please let me know if you have any questions. Your help is greatly appreciated.

Kind regards

Sally

**Sally Clarkson**

Senior Planner Fast Track Applications

Whare Kaupapa Atawhai | Conservation House

18 Manners Street

Te Whanganui-a-Tara | Wellington

*Please note: My work days are Mondays and Tuesdays*

**From:** Max Crowe <max@fieldlab.nz>  
**Sent:** Monday, 29 September 2025 2:51 pm  
**To:** Sally Clarkson  
**Subject:** Re: GIS shape file - Bendigo-Ophir Gold Project

Hi Sally,

Both the wetland and vegetation values assessments refer to the project impact area as including... "buffers of between 50 and 0 m", however the location and extent of these calculated buffers have not been provided. Im seeking more information on the location and size of those buffers.

Hope that helps!

Ngā mihi

Max

FIELDLAB

biodiversity restoration and monitoring specialist

[max@fieldlab.nz](mailto:max@fieldlab.nz)

s9(2)(a)

On Mon, 29 Sept 2025, 14:46 Sally Clarkson, <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)> wrote:

The only difference I could see between those two documents was the aggregated footprint files show the entire footprint which includes the road realignment, accommodation/offices etc areas.

Are you able to give a little more information on what it is exactly you would like to see as that may help them provide us with the right file. I will then go back to them.

Thanks Max.

Sally

---

**From:** Max Crowe <[max@fieldlab.nz](mailto:max@fieldlab.nz)>  
**Sent:** Monday, 29 September 2025 2:40 pm  
**To:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Subject:** Re: GIS shape file - Bendigo-Ophir Gold Project

Hi Sally,

Thanks for sending this through, however this file is another copy of the "aggregated footprint", and does not allow me to determine the size and location of

the buffers. Can you please try requesting this again?  
Ngā mihi,  
Max

On Mon, Sep 29, 2025 at 2:34 PM Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)> wrote:

Kia ora Max

I understand you were keen to see GIS shape files showing the spatial extent of any buffers incorporated into the project footprint. I emailed Santana and asked and have received GIS spatial data of the disturbance aggregated footprint. Please see attached files which can be uploaded via a GIS platform. I presume you can do this from your end?

I am not sure that this is exactly what you are after but do let me know.

Sally

**Sally Clarkson**

Senior Planner Fast Track Applications

Whare Kaupapa Atawhai | Conservation House

[18 Manners Street](#)

[Te Whanganui-a-Tara | Wellington](#)

*Please note: My work days are Mondays and Tuesdays*



Department of  
Conservation  
*Te Papa Atawhai*

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Thank you.

--

FIELDLAB

biodiversity restoration and monitoring specialist

[max@fieldlab.nz](mailto:max@fieldlab.nz)

s9(2)(a)

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## Email correspondence 37

**From:** [REDACTED]@santanaminerals.com>  
**Sent:** Thursday, 25 September 2025 12:38 pm  
**To:** John Roberts  
**Cc:** Meg Embleton-Muir  
**Subject:** Re: DOC visit to the Come in Time Battery

Hey John,

No problem- spring is a bit unpredictable alright.

Sounds good.

Cheers

[REDACTED]

---

**From:** John Roberts <jroberts@doc.govt.nz>  
**Sent:** Thursday, September 25, 2025 12:19 PM  
**To:** [REDACTED]@santanaminerals.com>  
**Cc:** Meg Embleton-Muir <memuir@doc.govt.nz>  
**Subject:** FW: DOC visit to the Come in Time Battery

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Hi [REDACTED] based on the rain today, some rain forecast over-night and the forecast tomorrow Meg and I are going to cancel (not having much luck with the wx getting to see things atm)

Our next possibility is October 14<sup>th</sup> – will be in touch closer to the time

Cheers

JR

---

**From:** John Roberts  
**Sent:** Wednesday, 24 September 2025 9:08 am  
**To:** [REDACTED]@santanaminerals.com>  
**Cc:** Meg Embleton-Muir <memuir@doc.govt.nz>  
**Subject:** RE: DOC visit to the Come in Time Battery

Great! – will pop in - not sure of our exact timing so will wing it and hopefully see you then

Cheers

John

---

**From:** s9(2)(a) <[REDACTED]@santanaminerals.com>  
**Sent:** Wednesday, 24 September 2025 8:58 am  
**To:** John Roberts <jroberts@doc.govt.nz>  
**Cc:** Meg Embleton-Muir <memuir@doc.govt.nz>  
**Subject:** Re: DOC visit to the Come in Time Battery

Morning John,

No problem.

Would be great to meet you- I will be in the Cromwell office all day - we are at 15a Chardonay Street. Unfortunately s9(2)(a) will be in a workshop that day, but myself and some of the other team will definitely be here if it suits you to call in on your way up, or way home (anytime other than 10.30-11.30am).

Cheers

---

**From:** John Roberts <jroberts@doc.govt.nz>  
**Sent:** Tuesday, September 23, 2025 2:04 PM  
**To:** s9(2)(a) <[REDACTED]@santanaminerals.com>  
**Cc:** Meg Embleton-Muir <memuir@doc.govt.nz>  
**Subject:** RE: DOC visit to the Come in Time Battery

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Thanks s9(2)(a) good info.

Timing to join us up to the CIT battery a bit awkward as we'll need to be doing that around mid-late morning when you are tied up, which is a pity.

But it would be good to meet you in person on our way back through – will you be at your base area around 1pm?

Cheers

John

---

**From:** s9(2)(a) <[REDACTED]@santanaminerals.com>  
**Sent:** Tuesday, 23 September 2025 11:05 am  
**To:** John Roberts <jroberts@doc.govt.nz>

**Cc:** Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>  
**Subject:** Re: DOC visit to the Come in Time Battery

Hey John,

Just had a chat to our site team- they said the track is really good at the moment so you would be fine to get to Come in Time Battery area (as long as we don't get heavy rain the day before).

We currently do not have any works on Thomsons Gorge Road, so you will be fine to access from Ardgour Road.

What time on Friday are you thinking? I have a team's call with your West Coast team at 10.30-11.30am- but other than that I am free and could join you. I would just need to be back at the base on Bendigo Loop Road by around 10.20am.

Cheers

---

**From:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>  
**Sent:** Monday, September 22, 2025 5:22 PM  
**To:** s9(2)(a) <[REDACTED]> <[\[REDACTED\]@santanaminerals.com](mailto:[REDACTED]@santanaminerals.com)>  
**Cc:** Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>  
**Subject:** DOC visit to the Come in Time Battery

**Caution:** This Email is from an EXTERNAL source. Please exercise caution. DO NOT open attachments or click on links from unknown senders or unexpected email.

Hi s9(2)(a) [REDACTED] am keen to have a look at the Come in Time Battery area as I've not been there before, so a visit would be good for context with respect to your proposed concessions.

It doesn't have to be this week, but the best time for me over the next couple of weeks is this Friday morning. Weather dependent of course but a couple of things:

- Do you know what the state of the road is at present regarding vehicle access getting up as far as the CIT Battery area? At this point we'd only be travelling in a RAV4 not a proper Hilux 4WD (we being me and Meg our Rec Advisor) so we're a bit limited – it may be that we need to delay until things dry out a bit.
- With the work going on in the area at the moment is access currently available off Ardgour Road?

Any other suggestions welcome – be great to meet you in person if there is the opportunity while in the area if you were able to join

Regards

JR

John Roberts  
Pou Ture Whenua, Statutory Manager  
Southern South Island Region  
Department of Conservation

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## Email correspondence 38

**From:** s9(2)(a)@santanaminerals.com>  
**Sent:** Tuesday, 23 September 2025 8:44 am  
**To:** Marie Burton  
**Cc:** Sally Clarkson; Jenni Fitzgerald; John Roberts  
**Subject:** Re: BOGP and DOC catch up

Thanks Marie, appreciate the update.

With regards to the lizards workshop- is online (teams) preferable?

Regarding the concessions one- do you mean Monday 6<sup>th</sup> October? (9<sup>th</sup> is a Thursday? )

**Concessions workshop - Monday 9th Oct – 3 – 4pm or October 10th 10-12pm (longer session may be preferable)**

---

**From:** Marie Burton <mpayne@doc.govt.nz>  
**Sent:** Monday, September 22, 2025 5:33 PM  
**To:** s9(2)(a)@santanaminerals.com>  
**Cc:** Sally Clarkson <sclarkson@doc.govt.nz>; Jenni Fitzgerald <jefitzgerald@doc.govt.nz>; John Roberts <jroberts@doc.govt.nz>  
**Subject:** RE: BOGP and DOC catch up

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Hey s9(2)(a)

**DOC commentary on assessments** - As discussed, we are working on getting written commentary to you on Heritage, Invertebrates, Lizards and Avifauna and this should be over the next 1-2 weeks (if any management plans can be shared in the interim, please send them through).

**Freshwater fisheries approvals** - I am keen to understand if freshwater fisheries approvals will be sought and if you can provide any further information on this (including scale), so we can line up the relevant expertise from our side.

**Concessions workshop** - Monday 9<sup>th</sup> Oct – 3 – 4pm or October 10<sup>th</sup> 10-12pm (longer session may be preferable)

Role	Name	Contact email
Senior Permissions Advisor	Carl Jones	<a href="mailto:cajones@doc.govt.nz">cajones@doc.govt.nz</a>

District Ops – Statutory manager	John Roberts	<a href="mailto:jroberts@doc.govt.nz">jroberts@doc.govt.nz</a>
Recreation advisor	Meg Embleton Muir	<a href="mailto:memuir@doc.govt.nz">memuir@doc.govt.nz</a>
Fast track project lead	Marie Payne	<a href="mailto:mpayne@doc.govt.nz">mpayne@doc.govt.nz</a>
Solicitor	Pene Williams	<a href="mailto:pwilliams@doc.govt.nz">pwilliams@doc.govt.nz</a>
FT Manager (optional)	Jenni Fitzgerald	<a href="mailto:jefitzgerald@doc.govt.nz">jefitzgerald@doc.govt.nz</a>

**Lizards workshop – Wens 1<sup>st</sup> Oct - 1-4 pm October availability**

Role	Name	Contact email
Wildlife Permissions advisor (optional)	Darcy Liddel	<a href="mailto:dliddell@doc.govt.nz">dliddell@doc.govt.nz</a>
District Ops – Statutory manager	John Roberts	<a href="mailto:jroberts@doc.govt.nz">jroberts@doc.govt.nz</a>
Lizard SME	Mandy Toucher	<a href="mailto:mtocher@lizardexpertnz.co.nz">mtocher@lizardexpertnz.co.nz</a>
Fast track project lead	Marie Payne	<a href="mailto:mpayne@doc.govt.nz">mpayne@doc.govt.nz</a>
Solicitor	Pene Williams	<a href="mailto:pwilliams@doc.govt.nz">pwilliams@doc.govt.nz</a>
BHV principal advisor (optional)	Laurence Barea	<a href="mailto:lbarea@doc.govt.nz">lbarea@doc.govt.nz</a>

**Invoicing** – DOC is moving to monthly invoicing for FT project costs (the first invoice will capture all costs from Feb 2025), this may not be sent until I am back but in the event it comes before, please be aware of this transition.

If you have any questions whilst I am away, please contact John/Sally (available Mon-Tues) – or with any urgent matter Jenni Fitzgerald.

Kind regards,

Marie

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** s9(2)(a) [redacted]@santanaminerals.com>  
**Sent:** Monday, 22 September 2025 3:53 pm  
**To:** Marie Burton <mpayne@doc.govt.nz>  
**Subject:** BOGP and DOC catch up

Hi Marie,

Thanks for your time this afternoon and organising everyone on your end.

Following on from that- we would like to organise the next meeting to discuss concessions, and also a Lizard workshop with Mandy, as suggested by the ecologists in the room today.

We think the workshop would probably be best done in person; however, I am not sure where everyone is based, so teams may be preferable for you?

Can you please let me know some potential dates for

1. Concessions discussion
2. Lizard Workshop

Kind regards,

s9(2)(a)  
[redacted]

Santana Minerals, Cromwell, NZ

s9(2)(a)

W: [www.santanaminerals.com](http://www.santanaminerals.com)



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**From:** [REDACTED]@santanaminerals.com>  
**Sent:** Wednesday, 24 September 2025 1:33 pm  
**To:** Sally Clarkson  
**Cc:** Marie Burton; [REDACTED] [REDACTED]  
**Subject:** Re: Bendigo-Ophir Gold Project  
**Attachments:** Section 3 - BBOGP Working Draft Substantive Application Report - Project Description (24 September 2025).pdf; DisturbanceAggregatedFootprint\_poly250330\_ST2028.zip

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Sally,

Thanks for your email. Please see attached the GIS spatial data of our disturbance aggregated footprint, as requested.

With regards to the stages of land disturbance - I have attached an updated project description for your reference- if you refer to section 3.24, it discusses the project timeframes and has a breakdown of the different stages with maps, which should answer your questions.

Kind regards,

[REDACTED]

---

**From:** Sally Clarkson <sclarkson@doc.govt.nz>  
**Sent:** Tuesday, September 23, 2025 5:09 PM  
**To:** [REDACTED]@santanaminerals.com>  
**Cc:** Marie Payne <mpayne@doc.govt.nz>  
**Subject:** Bendigo-Ophir Gold Project

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Hi [REDACTED]

We have had some queries from DOC's internal team involved in this project and I wonder if you are please able to provide responses. I have set the queries out below, relating to both land disturbance/earthworks and GIS files.

**Land Disturbance Queries:**

I note that the draft Project Description provided to DOC includes the maximum disturbance footprint as being 'worst-case' scenario (568 ha) but we are wondering if it is possible to provide some further details with regard to the intended disturbance – specifically how land disturbance activities will be staged and the intended timeframes. If available, areas would also be useful (I have noted some below).

By my reading of the Project Description, land disturbance will be required for the following activities. What have I missed?

- Establishment of the 'early works' activities at the Ardgour Terrace Site – including temporary construction workers accommodation, geology compound; admin buildings; car parking areas; laydown areas etc – 27 ha
- Realignment of a section of Thomson Gorge Rd (to facilitate access to the Ardgour Terrace Site)
- RAS open pit – 64.3 ha (life of mine = 6 years)
- SRX open pit – 15 ha
- Srex open pit – 1 ha
- CIT open pit – 13.8 ha
- Exploration drilling – 0.5-1 ha (staged)
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- Tailings Storage Facility – 61 ha
- Shepherds silt pond and seepage collection sump
- Aggregate pits x2 – 3 ha each
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- New and upgraded road access to site
- Haul roads

Could you please send through any information available relating to the staging and timeframes for the land disturbance activities.

#### **GIS Data Request:**

Our vegetation advisor has asked if it would be possible to provide a GIS file of the project site showing the spatial extent of any buffers incorporated into the project footprint?

Please let me know if you have any questions. Your help is greatly appreciated.

Kind regards  
Sally

**Sally Clarkson**  
Senior Planner Fast Track Applications  
Whare Kaupapa Atawhai | Conservation House  
18 Manners Street  
Te Whanganui-a-Tara | Wellington

## Email correspondence 40

**From:** s9(2)(a) [REDACTED]@santanaminerals.com>  
**Sent:** Tuesday, 23 September 2025 2:17 pm  
**To:** Sally Clarkson  
**Subject:** Re: Bendigo-Ophir Gold Project

Hey Sally,

We don't have a mine rehab plan for recreation- just the 'Landscape Closure Plan' which is in the document under appendix two (they are one and the same).

Many thanks,

s9(2)(a) [REDACTED]

---

**From:** Sally Clarkson <sclarkson@doc.govt.nz>  
**Sent:** Tuesday, September 23, 2025 2:09 PM  
**To:** s9(2)(a) [REDACTED]@santanaminerals.com>  
**Subject:** RE: Bendigo-Ophir Gold Project

**Caution:** This Email is from an EXTERNAL source. Please exercise caution. DO NOT open attachments or click on links from unknown senders or unexpected email.

Hi s9(2)(a) [REDACTED]

Our recreation advisor who is inputting into the proposal has noted that the Recreation Assessment contents page (as well as a page at the end of the assessment for Appendix 2: Mine rehabilitation plan for recreation) includes reference to a rehabilitation plan for recreation. Do you know anything about this and if we could have a copy?

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**Matakanui Gold Limited Bendigo-Ophir Gold Project  
Recreation Assessment  
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Thanks for your assistance.

Sally

---

**From:** [s9(2)(a)]@santanaminerals.com>

**Sent:** Thursday, 18 September 2025 4:26 pm

**To:** Sally Clarkson <sclarkson@doc.govt.nz>

**Subject:** Fw: Bendigo-Ophir Gold Project

Hi Sally,

Hope you are well,

Thanks for your email. You have noticed an error in the report- so thank you for pointing that out to us- we had not picked that one up!

To confirm, there is no 'Mine Rehabilitation Plan for Recreation'. Just the 'Landscape Closure Plan' that is included in the document itself.

Also confirming that you have the most up to date copy.

Kind regards

s9(2)(a)

---

**From:** s9(2)(a) <[redacted]@santanaminerals.com>  
**Sent:** Tuesday, September 16, 2025 4:32 PM  
**To:** s9(2)(a) <[redacted]@santanaminerals.com>  
**Subject:** FW: Bendigo-Ophir Gold Project

Hi [redacted], do you mind assisting Sally please?

[redacted]  
s9(2)(a)



[redacted]  
s9(2)(a)

[www.santanaminerals.com](http://www.santanaminerals.com)

[redacted]  
s9(2)(a)

15a Chardonay Street, Cromwell, 9310

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---

**From:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Sent:** Tuesday, 16 September 2025 4:16 pm  
**To:** s9(2)(a) <[redacted]@santanaminerals.com>  
**Subject:** Bendigo-Ophir Gold Project

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Hi [redacted]  
s9(2)(a)

I hope you are well. I have a couple of questions for you in relation to the Recreation Assessment prepared by Rob Greenaway & Associates.

- The assessment includes Appendix 2: Mine rehabilitation plan for recreation. Is it possible to have a copy of this plan? It has been prepared by Boffa Miskell. I note that we have a copy of the Landscape Mitigation Plan, also prepared by Boffa Miskell, but this does not appear to be the document referred to.
- Is this the most up to date version of the Rec Assessment, noting that the cover page says June 2025 but the report says June 2024, Final?

Thanks [redacted]  
s9(2)(a)

Sally

**Sally Clarkson**

Senior Planner Fast Track Applications  
Whare Kaupapa Atawhai | Conservation House  
18 Manners Street  
Te Whanganui-a-Tara | Wellington  
*Please note: My work days are Mondays and Tuesdays*



Department of  
Conservation  
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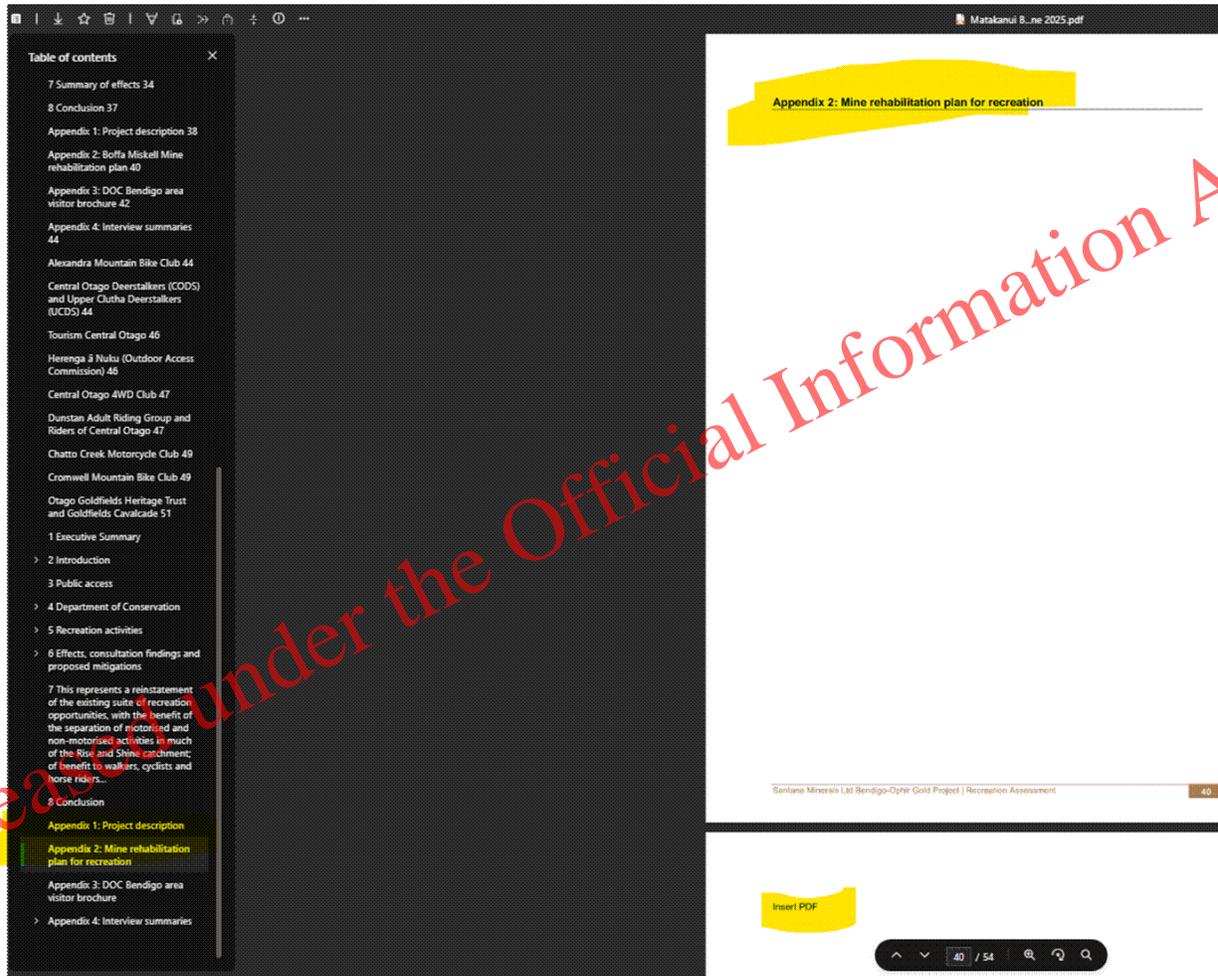
Released under the Official Information Act

**From:** Meg Embleton-Muir  
**Sent:** Friday, 19 September 2025 10:05 am  
**To:** Sally Clarkson  
**Subject:** RE: Bendigo-Ophir Gold Project

Hi Sally

That doesn't line up with what's in the recreation assessment document. Can you ask them to check against the screenshot below.

Thanks  
Meg



**From:** Sally Clarkson <sclarkson@doc.govt.nz>  
**Sent:** Friday, 19 September 2025 9:51 am  
**To:** Meg Embleton-Muir <memuir@doc.govt.nz>  
**Subject:** FW: Bendigo-Ophir Gold Project

Kia ora Meg,

I hope you are well.

Please see **s9(2)(a)** response below responding to the queries you raised in relation to the Recreation Assessment.

Let me know if you need anything else or have any further questions.

Regards  
Sally

From: s9(2)(a) <[REDACTED]@santanaminerals.com>  
Sent: Thursday, 18 September 2025 4:26 pm  
To: Sally Clarkson <sclarkson@doc.govt.nz>  
Subject: Fw: Bendigo-Ophir Gold Project

Hi Sally,

Hope you are well,

Thanks for your email. You have noticed an error in the report- so thank you for pointing that out to us- we had not picked that one up!  
To confirm, there is no 'Mine Rehabilitation Plan for Recreation'. Just the 'Landscape Closure Plan' that is included in the document itself.

Also confirming that you have the most up to date copy.

Kind regards

s9(2)(a)

---

From: s9(2)(a) <[REDACTED]@santanaminerals.com>  
Sent: Tuesday, September 16, 2025 4:32 PM  
To: s9(2)(a) <[REDACTED]@santanaminerals.com>  
Subject: FW: Bendigo-Ophir Gold Project

Hi s9(2)(a) do you mind assisting Sally please?

s9(2)(a)

**SANTANA MINERALS LIMITED** | **MATAKANUI GOLD LIMITED**

s9(2)(a)

[www.santanaminerals.com](http://www.santanaminerals.com)

s9(2)(a)

15a Chardonnay Street, Cromwell, 9310

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---

From: Sally Clarkson <sclarkson@doc.govt.nz>  
Sent: Tuesday, 16 September 2025 4:16 pm  
To: s9(2)(a) <[REDACTED]@santanaminerals.com>  
Subject: Bendigo-Ophir Gold Project

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Hi s9(2)(a)

I hope you are well. I have a couple of questions for you in relation to the Recreation Assessment prepared by Rob Greenaway & Associates.

- The assessment includes Appendix 2: Mine rehabilitation plan for recreation. Is it possible to have a copy of this plan? It has been prepared by Boffa Miskell. I note that we have a copy of the Landscape Mitigation Plan, also prepared by Boffa Miskell, but this does not appear to be the document referred to.
- Is this the most up to date version of the Rec Assessment, noting that the cover page says June 2025 but the report says June 2024, Final?

Thanks s9(2)(a)

Sally

**Sally Clarkson**

Senior Planner Fast Track Applications  
Whare Kaupapa Atawhai | Conservation House  
18 Manners Street

Te Whanganui-a-Tara | Wellington

*Please note: My work days are Mondays and Tuesdays*



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**From:** Laurence Barea  
**Sent:** Tuesday, 23 September 2025 2:38 pm  
**To:** s9(2)(a) Darcy Liddell; John Roberts;  
mtocher@lizardexpertnz.co.nz; Marie Burton; Pene Williams  
**Subject:** RE: Lizard workshop BOGP

Hi, I am not a herpetofauna expert and don't think I am needed at this meeting. I have talked with Marie about outsourcing the offsetting / compensation as I am at capacity.

Ngā mihi,  
I work Monday to Thursday  
Dr Laurence Barea  
Principal Advisor  
Biodiversity Systems and Performance Team  
Department of Conservation | Te Papa Atawhai [www.doc.govt.nz](http://www.doc.govt.nz)  
s9(2)(a)

---

**From:** s9(2)(a)@santanaminerals.com>  
**Sent:** Tuesday, 23 September 2025 11:43 am  
**To:** Darcy Liddell <dliddell@doc.govt.nz>; John Roberts <jroberts@doc.govt.nz>;  
mtocher@lizardexpertnz.co.nz; Marie Burton <mpayne@doc.govt.nz>; Pene Williams  
<pwilliams@doc.govt.nz>; Laurence Barea <lbarea@doc.govt.nz>  
**Subject:** Lizard workshop BOGP

Hello all,

I am just trying to organise a lizard workshop for the Bendigo Ophir Gold Project, and just wondering what is everyone's preference is- to meet in person or over a team's call? Where is everyone based? I assume we are all spread out over the country, rather than Central Otago based.

Kind regards,

s9(2)(a)

Santana Minerals | Cromwell, NZ

s9(2)(a)

| W: [www.santanaminerals.com](http://www.santanaminerals.com)



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**From:** Pene Williams  
**Sent:** Tuesday, 23 September 2025 1:06 pm  
**To:** s9(2)(a) Darcy Liddell; John Roberts;  
mtocher@lizardexpertnz.co.nz; Marie Burton; Laurence Barea  
**Subject:** RE: Lizard workshop BOGP

Kia ora s9(2)(a)

Thank you for the invitation, I don't consider this is a workshop which I would need to attend, as I will follow up with others post any hui.

Kind regards/ Kā mihi,  
Pene

**Pene Williams** ([she / her](#))

Senior Solicitor | Rōia Matua – Legal Services | Ngā Ratonga Ture

Dunedin | Ōtepoti Office

Phone Waea DDI: s9(2)(a)

Level 1, John Wickliffe House | 265 Princes Street | Dunedin | P O Box 5244 | Dunedin 9054

[www.doc.govt.nz](http://www.doc.govt.nz)



**From:** s9(2)(a)@santanaminerals.com>

**Sent:** Tuesday, 23 September 2025 11:43 am

**To:** Darcy Liddell <dliddell@doc.govt.nz>; John Roberts <jroberts@doc.govt.nz>;  
mtocher@lizardexpertnz.co.nz; Marie Burton <mpayne@doc.govt.nz>; Pene Williams  
<pwilliams@doc.govt.nz>; Laurence Barea <lbarea@doc.govt.nz>

**Subject:** Lizard workshop BOGP

Hello all,

I am just trying to organise a lizard workshop for the Bendigo Ophir Gold Project, and just wondering what is everyone's preference is- to meet in person or over a team's call? Where is everyone based? I assume we are all spread out over the country, rather than Central Otago based.

Kind regards,

s9(2)(a)

Santana Minerals | Cromwell, NZ

s9(2)(a) | W: [www.santanaminerals.com](http://www.santanaminerals.com)

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MATAKANUI  
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**From:** Ann Rodgers <Ann.Rodgers@codc.govt.nz>  
**Sent:** Tuesday, 23 September 2025 11:51 am  
**To:** Shay McDonald; Sally Clarkson; Fiona Garrett  
**Subject:** RE: Bendigo-Ophir Gold Project

Hi Sally/Shay

The three days identified by Shay work for me also.

Regards

Ann

**Ann Rodgers**  
Principal Policy Planner



s9(2)(a)

✉ Ann.Rodgers@codc.govt.nz  
📍 1 Dunorling Street, Alexandra 9320  
🌐 www.codc.govt.nz

If you have received this email and any attachments to it in error, please take no action based on it, copy it or show it to anyone. Please advise the sender and delete your copy. Thank you.

---

**From:** Shay McDonald <Shay.McDonald@orc.govt.nz>  
**Sent:** Tuesday, 23 September 2025 10:38 am  
**To:** Sally Clarkson <sclarkson@doc.govt.nz>; Ann Rodgers <Ann.Rodgers@codc.govt.nz>; Fiona Garrett <Fiona.Garrett@codc.govt.nz>  
**Subject:** RE: Bendigo-Ophir Gold Project

Hi Sally,

Thanks for getting in touch. I agree a meeting would be useful. Of your suggested times I can do:

- Thursday 2nd Oct 2-4pm
- Friday 3rd Oct anytime
- Monday 6th Oct 1-2pm

I believe Ann is currently on leave. I've included Fiona Garrett in my reply, as she'll be able to let you know when Ann is back or if someone else would attend on her behalf.

Thanks,

Shay



**Shay McDonald**

**Principal Consent Planner**  
Consents

s9(2)(a) | [Shay.McDonald@orc.govt.nz](mailto:Shay.McDonald@orc.govt.nz)

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**From:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>

**Sent:** Tuesday, 23 September 2025 10:33 am

**To:** Shay McDonald <[Shay.McDonald@orc.govt.nz](mailto:Shay.McDonald@orc.govt.nz)>; [Ann.Rodgers@codc.govt.nz](mailto:Ann.Rodgers@codc.govt.nz)

**Subject:** Bendigo-Ophir Gold Project

[Caution: External Email] This email originated from outside ORC. Do not click links or open attachments unless you trust the sender and know the content is safe. Use the Phish Alert Button to report this email if you think it is suspicious.

Kia ora Shay and Ann,

I am following up on recent emails regarding the Bendigo Gold Mine project and specifically, pre-lodgement consultation, under the Fast Track Approvals Act. I have been working with the project lead (Marie) here at DOC reviewing the technical information provided to us from Santana and providing high-level feedback on that information.

We thought it would be beneficial to meet and have a general discussion with you both (with a focus on areas of mutual interest; compensation and offsetting; landscape assessments (CODC); and freshwater assessments (ORC)).

I have checked calendars from this end and suggest the following time slots. If you could both please advise your availability for the following times that would be great. Happy to provide more options if required.

- Tuesday 30<sup>th</sup> Sept 1-2pm
- Thursday 2<sup>nd</sup> Oct 2-4pm
- Friday 3<sup>rd</sup> Oct anytime
- Monday 6<sup>th</sup> Oct 1-2pm

Kind regards  
Sally

**Sally Clarkson**

Senior Planner Fast Track Applications  
Whare Kaupapa Atawhai | Conservation House  
18 Manners Street  
Te Whanganui-a-Tara | Wellington

*Please note: My work days are Mondays and Tuesdays*



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## Email correspondence 43

**From:** Marie Burton  
**Sent:** Monday, 22 September 2025 5:04 pm  
**To:** Nicholas Dunn; Rogan Colbourne; Warren Chinn; Carl Jones; Darcy Liddell; Liz Williams; Pene Williams; John Roberts; Matt Schmidt; Clare Fleming; Debbie Lewis; DLVC\_FIELDLAB - MAX M L CROWE; Mandy Tocher  
**Cc:** Richard Ewans; Laurence Barea  
**Subject:** RE: Bendigo Weekly Catch Up - Project Team

Hi again,

Thanks all for your input and feedback at the Wildlife session today.

Here is where I have saved my notes – please feel free to add any observations/your own notes too

 [Notes from Santana Wildlife Session 22 Sept 2025.docx](#)

Kind regards,

Marie

**Marie Payne**

Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

-----Original Appointment-----

**From:** Marie Burton  
**Sent:** Monday, 22 September 2025 4:09 pm  
**To:** Nicholas Dunn; Rogan Colbourne; Warren Chinn; Carl Jones; Darcy Liddell; Liz Williams; Pene Williams; John Roberts; Matt Schmidt; Clare Fleming; Debbie Lewis; max@fieldlab.nz; Mandy Tocher  
**Cc:** Richard Ewans  
**Subject:** Canceled: Bendigo Weekly Catch Up - Project Team  
**When:** Thursday, 25 September 2025 11:00 am-11:40 am (UTC+12:00) Auckland, Wellington.  
**Where:** Microsoft Teams Meeting; HOK-Whitcombe  
**Importance:** High

Hi all,

s9(2)(a)

so cancelling this meeting. The applicant confirmed in our meeting today that they will not be lodging at the end of Sept but in the coming weeks.

Sally will continue to work on collating our feedback to the applicant and may send out a summary of your feedback to review shortly.

One of the key things from reviewing feedback to date is ensuring that where we have identified issues or considerations we set out clearly the impacts of this on the project i.e. the issue / residual effects and how in DOC's view this should be addressed e.g. at a high level.

See you next week.

Kind regards,

Hey,

Just moving this reoccurrence from 12pm, every week I will aim to send out an update and mini agenda prior to the meeting so that it peoples time is utilised as efficiently as possible.

Kind regards,

Marie

---

**Microsoft Teams** [Need help?](#)

[Join the meeting now](#)

s9(2)(k)

---

**Dial in by phone**

s9(2)(k)

**From:** Marie Burton  
**Sent:** Monday, 22 September 2025 1:23 pm  
**To:** Max Crowe  
**Subject:** RE: FW: DOC Feedback on draft concession proposals - Bendigo Ophir Gold FT Project

Hey Max,

The conversation is touching on lots of pest/weed control already – so not sure if you would also find this useful?

Kind regards,

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Marie Burton  
**Sent:** Monday, 22 September 2025 11:44 am  
**To:** 'Max Crowe' <max@fieldlab.nz>  
**Subject:** RE: FW: DOC Feedback on draft concession proposals - Bendigo Ophir Gold FT Project

Thanks Max – do you have a mob number happy to text you or if you want to join for all and just have the meeting running in the background. I will leave it with you.

Kind regards,

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Max Crowe <max@fieldlab.nz>  
**Sent:** Monday, 22 September 2025 11:43 am

To: Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

Subject: Re: FW: DOC Feedback on draft concession proposals - Bendigo Ophir Gold FT Project

Hi Marie,

Yes, happy to join for that part of the session.

Cheers,

Max

On Fri, Sep 19, 2025 at 2:42 PM Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)> wrote:

Hey Max,

Please see the below response from Satana – would you just want to join for that part of the session?

Kind regards,

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



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*Te Papa Atawhai*

---

From: s9(2)(a) <[s9\(2\)\(a\)@santanaminerals.com](mailto:s9(2)(a)@santanaminerals.com)>

Sent: Friday, 19 September 2025 2:28 pm

To: Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

Cc: s9(2)(a) <[s9\(2\)\(a\)@santanaminerals.com](mailto:s9(2)(a)@santanaminerals.com)>

Subject: Re: DOC Feedback on draft concession proposals - Bendigo Ophir Gold FT Project

Hey Marie,

OK noted- We can do the concessions on another day. Our planner is going to attend both anyway, so we are flexible in that regard. He will still be there to answer any questions that do come up.

Yes, deer and goats have been included in our pest surveys and management plans.

Cheers

---

**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Sent:** Friday, September 19, 2025 2:04 PM

**To:** s9(2)(a) <[REDACTED]> <[\[REDACTED\]@santanaminerals.com](mailto:[REDACTED]@santanaminerals.com)>

**Subject:** RE: DOC Feedback on draft concession proposals - Bendigo Ophir Gold FT Project

**Caution:** This Email is from an EXTERNAL source. Please exercise caution. DO NOT open attachments or click on links from unknown senders or unexpected email.

Hey [REDACTED]

Just tried to give you a quick call –following up on the below as we won't have the right people in the room for a broader concessions discussion (e.g. Actual and potential effects on wildlife of the proposed concession)

I also got a very specific question from one of our advisors after viewing the agenda which was..." whether mammalian herbivores are included in scope – for the mammalian pest management topic?" – they are providing terrestrial ecology support and are figuring out if attending this would be appropriate. If you can confirm that would be helpful thanks.

Kind regards,

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: [REDACTED]



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*Te Papa Atawhai*

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---

**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Sent:** Thursday, 18 September 2025 3:29 pm

**To:** s9(2)(a) <[REDACTED]> <[\[REDACTED\]@santanaminerals.com](mailto:[REDACTED]@santanaminerals.com)>

**Subject:** RE: DOC Feedback on draft concession proposals - Bendigo Ophir Gold FT Project

Thanks s9(2)(a) <[REDACTED]>

I was under the impression concessions and conditions were going to be covered off in a separate session – or is this more specifically the assessment of biodiversity effects in relation to the concessions?

Kind regards,

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a) <[REDACTED]>



Department of Conservation  
*Te Papa Atawhai*

---

**From:** s9(2)(a) <[REDACTED]> <[\[REDACTED\]@santanaminerals.com](mailto:[REDACTED]@santanaminerals.com)>

**Sent:** Thursday, 18 September 2025 2:59 pm

**To:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Subject:** Re: DOC Feedback on draft concession proposals - Bendigo Ophir Gold FT Project

Hi Marie,

You should have received an updated calendar invite with the agenda- but please see attached also.

See you on Monday.

Kind regards,

s9(2)(a)

---

**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Sent:** Thursday, September 18, 2025 2:07 PM

**To:** s9(2)(a) <[REDACTED]> <[\[REDACTED\]@santanaminerals.com](mailto:[REDACTED]@santanaminerals.com)>

**Cc:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>

**Subject:** DOC Feedback on draft concession proposals - Bendigo Ophir Gold FT Project

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Hey s9(2)(a)

Please find attached DOC's feedback on the concessions proposals and conditions.

As you will see the feedback is at a relatively high-level (noting some of the considerations we have raised might be addressed elsewhere in the documents you have provided) and that there are a few key issues we would like to work through further. I'm happy to discuss/take a call, but also suggest (as I think you are planning anyway) that working through in a meeting/workshop setting might work best?

Kind regards,

Marie

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

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--

FIELDLAB

biodiversity restoration and monitoring specialist

[max@fieldlab.nz](mailto:max@fieldlab.nz)

s9(2)(a)

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## Email correspondence 45

**From:** Marie Burton  
**Sent:** Monday, 22 September 2025 12:24 pm  
**To:** John Roberts; Pene Williams  
**Cc:** Sally Clarkson; Jenni Fitzgerald  
**Subject:** Marie on leave next week

Hey all,

s9(2)(a)

I was going to email the project team and let them know any urgent/key issues – they should get in touch with Jenni and for any more project specific questions could they email (John – cc'd in Pene and Sally (noting Sally is only mon-tues). Is this OK?

At the moment we are collating the expert feedback in relation to invertebrates, lizards, heritage, freshwater and avifauna (Rogan is working on avifauna which we haven't received yet). I am also seeking to clarify their intended lodgement date today at the Wildlife session.

Kind regards,

**Marie Payne**

Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

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# Email correspondence 46

**From:** Marie Burton  
**Sent:** Monday, 22 September 2025 11:53 am  
**To:** Pene Williams; Lynn Adams; Darcy Liddell  
**Cc:** Lynn Hansberry  
**Subject:** RE: Bendigo-Ophir Gold Project biodiversity subgroup meeting - brief legal advice

s9(2)(h)

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**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Pene Williams <pwilliams@doc.govt.nz>

**Sent:** Monday, 22 September 2025 11:29 am

**To:** Lynn Adams <ladams@doc.govt.nz>; Darcy Liddell <dliddell@doc.govt.nz>; Marie Burton <mpayne@doc.govt.nz>

**Cc:** Lynn Hansberry <lhansberry@doc.govt.nz>

**Subject:** RE: Bendigo-Ophir Gold Project biodiversity subgroup meeting - brief legal advice

Kia ora koutou,

s9(2)(h)



Kind regards/ Kā mihi,

Pene

**Pene Williams** (she / her)

Senior Solicitor | Rōia Matua – Legal Services | Ngā Ratonga Ture  
Dunedin | Ōtepoti Office

Phone Waea DDI: s9(2)(a)

Level 1, John Wickliffe House | 265 Princes Street | Dunedin | P O Box 5244 | Dunedin 9054

[www.doc.govt.nz](http://www.doc.govt.nz)



**From:** Lynn Adams <[ladams@doc.govt.nz](mailto:ladams@doc.govt.nz)>

**Sent:** Monday, 22 September 2025 10:39 am

**To:** Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; Darcy Liddell <[dliddell@doc.govt.nz](mailto:dliddell@doc.govt.nz)>; Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Cc:** Lynn Hansberry <[lhansberry@doc.govt.nz](mailto:lhansberry@doc.govt.nz)>

**Subject:** RE: Bendigo-Ophir Gold Project biodiversity subgroup meeting

Hi Marie

s9(2)(h)

Lynn

---

**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Sent:** Friday, 19 September 2025 11:58 am

**To:** Lynn Hansberry <[lhansberry@doc.govt.nz](mailto:lhansberry@doc.govt.nz)>

**Cc:** Lynn Adams <[ladams@doc.govt.nz](mailto:ladams@doc.govt.nz)>; Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; Darcy Liddell

<[dliddell@doc.govt.nz](mailto:dliddell@doc.govt.nz)>

**Subject:** FW: Bendigo-Ophir Gold Project biodiversity subgroup meeting

Hi Lynn(s),

s9(2)(j)

Kind regards,

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Mandy Tocher <[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz)>

**Sent:** Thursday, 18 September 2025 3:40 pm

**To:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Subject:** RE: Bendigo-Ophir Gold Project biodiversity subgroup meeting

s9(2)(j)

Thanks for your patience!  
Mandy



LizardExpertNZ

**Mandy Tocher**

*B.Sc., M.Sc. (Hon), Ph.D., M.Plan. (Dist).*

*RMA hearings commissioner*

Herpetologist

s9(2)(a)

[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz) Email

[www.lizardexpertnz.co.nz](http://www.lizardexpertnz.co.nz) Web

[www.facebook.com/lizardexpertNZ](https://www.facebook.com/lizardexpertNZ) Follow Me



---

**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Sent:** Thursday, 18 September 2025 3:31 pm

**To:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>; Max Crowe <s9(2)(a)>; Mandy Tocher <[mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz)>; Rogan Colbourne <[rcolbourne@doc.govt.nz](mailto:rcolbourne@doc.govt.nz)>; Warren Chinn <[wchinn@doc.govt.nz](mailto:wchinn@doc.govt.nz)>; Darcy Liddell <[dliddell@doc.govt.nz](mailto:dliddell@doc.govt.nz)>

**Cc:** Nicholas Dunn <[ndunn@doc.govt.nz](mailto:ndunn@doc.govt.nz)>; DLVC\_FIELDLAB - MAX M L CROWE <[max@fieldlab.nz](mailto:max@fieldlab.nz)>; Richard Ewans <[rewans@doc.govt.nz](mailto:rewans@doc.govt.nz)>

**Subject:** RE: Bendigo-Ophir Gold Project biodiversity subgroup meeting

Hey all,

Please see the agenda for Monday, I have gone back and asked if the concessions/conditions relates specifically to biodiversity, I'll ask them to remove and organise.

Nicholas – I note no mentioned of freshwater values/species so don't believe you attendance is required.

Kind regards,

Marie

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)

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# Department of Conservation

## *Te Papa Atawhai*

-----Original Appointment-----

**From:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>

**Sent:** Tuesday, 16 September 2025 9:32 am

**To:** Sally Clarkson; Sally Clarkson; Max Crowe; Mandy Tocher; Rogan Colbourne; Warren Chinn; Darcy Liddell; Marie Burton

**Cc:** Nicholas Dunn; DLVC\_FIELDLAB - MAX M L CROWE; Richard Ewans

**Subject:** Bendigo-Ophir Gold Project biodiversity subgroup meeting

**When:** Thursday, 18 September 2025 3:00 pm-4:00 pm (UTC+12:00) Auckland, Wellington.

**Where:** Microsoft Teams Meeting; WGN - 1.01 Tuatara (Seats 6, Full AV)

Hi everyone,

Marie has asked me to set up a weekly meeting for the biodiversity experts on the project team for Bendigo. Going forward, the intention is that the meetings will be on a Monday afternoon (depending on availability, I'll send a separate invite out soon).

The purpose of these meetings will be to:

- Identify and discuss common themes/gaps
- Align on the technical details of the proposal
- Address any gaps or issues
- Share knowledge to ensure a consistent and co-ordinated approach.

Regards,  
Sally

---

**Microsoft Teams** [Need help?](#)

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s9(2)(k)

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**Dial in by phone**

s9(2)(k)

**From:** Marie Burton  
**Sent:** Thursday, 18 September 2025 4:09 pm  
**To:** Laurence Barea  
**Subject:** RE: Bendigo-Ophir Gold Project biodiversity subgroup meeting

Hey Laurence,

This might be something I need to follow up as compensation is going to be an issue for consideration (not necessarily at this meeting/no need to attend). Who would I send a request to for someone to be assigned to the project team from compensation perspective?

Kind regards,

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Laurence Barea <larea@doc.govt.nz>  
**Sent:** Thursday, 18 September 2025 4:06 pm  
**To:** Marie Burton <mpayne@doc.govt.nz>  
**Subject:** RE: Bendigo-Ophir Gold Project biodiversity subgroup meeting

Hi Marie, I had no invite to this meeting. I have not been assigned to this case as far as I am aware.

Ngā mihi,  
I work Monday to Thursday  
Dr Laurence Barea  
Principal Advisor  
Biodiversity Systems and Performance Team  
Department of Conservation | Te Papa Atawhai [www.doc.govt.nz](http://www.doc.govt.nz)  
s9(2)(a)

---

**From:** Marie Burton <mpayne@doc.govt.nz>  
**Sent:** Thursday, 18 September 2025 3:57 pm  
**To:** Sally Clarkson <sclarkson@doc.govt.nz>; DLVC\_FIELDLAB - MAX M L CROWE <max@fieldlab.nz>; Mandy Tocher <mtocher@lizardexpertnz.co.nz>; Rogan Colbourne <rcolbourne@doc.govt.nz>; Warren Chinn <wchinn@doc.govt.nz>; Darcy Liddell <dliddell@doc.govt.nz>; Laurence Barea <larea@doc.govt.nz>

Cc: Nicholas Dunn <[ndunn@doc.govt.nz](mailto:ndunn@doc.govt.nz)>  
Subject: RE: Bendigo-Ophir Gold Project biodiversity subgroup meeting

Hey all,

Thanks for your time again this afternoon.

Actions out of the meeting:

Marie to:

- o s9(2)(h)
- o Request GIS file of buffer footprint from applicant
- o Follow up request for timeframes around disturbance and works
- o Confirm what specific mammalian pest management will be covered in the meeting on Monday and let Max know

Tech advisors to:

**Continue assessment of technical advice**

- Sources: [Ecology](#) provided by applicant (will useful to have reviewed prior to Monday) there is also a summary of the other reports provided here [Technical Report Summary - Bendigo-Ophir Gold Project.docx](#) and a more succinct overview of their proposal document here: [Section 3 - Project Description Summary.docx](#)
- [BHV feedback on assessments and application documents template - please save a copy.docx](#) This is a template to help guide feedback don't worry about using it if you have already provided feedback it's a tool and not a 'strict' template. It might also provide some more guidance around how conservation values are being assessed as part of the FTAA

Key focus on

- o Biodiversity values – summary / do they align with DOC's view
- o critical issues/questions/gaps

**Provide commentary on biodiversity effects in relation to concession proposals**(high level)

- Source: [DOC Feedback on concessions proposals and conditions Sept 2025.pdf](#)
- We have already fed back to the applicant that they need to do this as part of an effects assessment for the concessions so with that in mind our feedback should be high level

Biodiversity focus: e.g. Wildlife Avifauna		
Concession	Key values	High level feedback/commentary
Come In Time Battery Access Concession Proposal through the Bendigo Historic Reserve		

Ardgour Rise Concession Area Proposal		
SH8 Concession Area Proposal		
<i>Willow Concession Area</i>		

**Marie Payne**

Senior Advisor Fast Track Applications  
 Te Whanganui-a-Tara | Wellington  
 Mobile: s9(2)(a)

**Marie Payne**

Senior Advisor Fast Track Applications  
 Te Whanganui-a-Tara | Wellington  
 Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atarau*

-----Original Appointment-----

**From:** Sally Clarkson <sclarkson@doc.govt.nz>

**Sent:** Tuesday, 16 September 2025 10:05 am

**To:** Sally Clarkson; Sally Clarkson; DLVC\_FIELDLAB - MAX M L CROWE; Mandy Tocher; Rogan Colbourne; Warren Chinn; Darcy Liddell; Marie Burton

**Cc:** Nicholas Dunn

**Subject:** Bendigo-Ophir Gold Project biodiversity subgroup meeting

**When:** Occurs every Monday effective 22/09/2025 until 15/12/2025 from 11:00 am to 11:30 am (UTC+12:00) Auckland, Wellington.

**Where:** Microsoft Teams Meeting; WGN - G.05 Totorore (Seats 4, Full AV)

Weekly meeting for the biodiversity experts on the project team for Bendigo.

The purpose of these meetings will be to:

- Identify and discuss common themes/gaps
- Align on the technical details of the proposal
- Address any gaps or issues
- Share knowledge to ensure a consistent and co-ordinated approach.

Marie – G.05 is not available on 13 October but I have booked 1.02 instead.

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s9(2)(k)

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s9(2)(k)



Department of Conservation  
*Te Papa Atawhai*

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## Email correspondence 48

**From:** Marie Burton  
**Sent:** Thursday, 18 September 2025 3:31 pm  
**To:** Sally Clarkson; Max Crowe; Mandy Tocher; Rogan Colbourne; Warren Chinn; Darcy Liddell  
**Cc:** Nicholas Dunn; DLVC\_FIELDLAB - MAX M L CROWE; Richard Ewans  
**Subject:** RE: Bendigo-Ophir Gold Project biodiversity subgroup meeting  
**Attachments:** Angenda -DOC & MGL Catch up- BOGP- 22nd September 2025.docx

Hey all,

Please see the agenda for Monday, I have gone back and asked if the concessions/conditions relates specifically to biodiversity, I'll ask them to remove and organise.

Nicholas – I note no mentioned of freshwater values/species so don't believe you attendance is required.

Kind regards,

Marie

**Marie Payne**

Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

-----Original Appointment-----

**From:** Sally Clarkson <sclarkson@doc.govt.nz>  
**Sent:** Tuesday, 16 September 2025 9:32 am  
**To:** Sally Clarkson; Sally Clarkson; Max Crowe; Mandy Tocher; Rogan Colbourne; Warren Chinn; Darcy Liddell; Marie Burton  
**Cc:** Nicholas Dunn; DLVC\_FIELDLAB - MAX M L CROWE; Richard Ewans  
**Subject:** Bendigo-Ophir Gold Project biodiversity subgroup meeting  
**When:** Thursday, 18 September 2025 3:00 pm-4:00 pm (UTC+12:00) Auckland, Wellington.  
**Where:** Microsoft Teams Meeting; WGN - 1.01 Tuatara (Seats 6, Full AV)

Hi everyone,

Marie has asked me to set up a weekly meeting for the biodiversity experts on the project team for Bendigo. Going forward, the intention is that the meetings will be on a

Monday afternoon (depending on availability, I'll send a separate invite out soon).

The purpose of these meetings will be to:

- Identify and discuss common themes/gaps
- Align on the technical details of the proposal
- Address any gaps or issues
- Share knowledge to ensure a consistent and co-ordinated approach.

Regards,  
Sally

---

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s9(2)(k)

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**Dial in by phone**

s9(2)(k)



Department of Conservation  
*Te Papa Atawhai*

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**Agenda**

To: Department of Conservation

From: Matakanui Gold Limited

Date: Monday 22<sup>nd</sup> September 2025

Time: 1-3pm

Re: Bendigo Ophir Gold Project

	Item	who	Time
1	Introductions	All	5min
2	General Introduction and update to BOGP. <ul style="list-style-type: none"> <li>• General overview of project</li> <li>• Update on FTA</li> </ul>	s9(2)(a) [redacted] (MGL s9(2)(a) [redacted])	5 min
3	Concessions and conditions	s9(2)(a) [redacted] (MGL [redacted])	30 min
4	<ul style="list-style-type: none"> <li>• Lizard values &amp; management</li> <li>• Avifauna values &amp; management</li> <li>• Mammalian pests &amp; management</li> <li>• Terrestrial invertebrates &amp; management</li> <li>• Wildlife approvals</li> </ul>	s9(2)(a) [redacted] (MGL Ecologists)	1hour
5	Summary/wrap up	All	20 min

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<[pamarshall@doc.govt.nz](mailto:pamarshall@doc.govt.nz)>; Tracey Grose <[tgrose@doc.govt.nz](mailto:tgrose@doc.govt.nz)>; Liz Williams <[lwilliams@doc.govt.nz](mailto:lwilliams@doc.govt.nz)>  
**Subject:** Record of approvals given under the Bendigo covenant - beyond the 2017-23 exploration ones

Morning Marie - you ask:

*John – in terms of the covenant and any approvals for activities the department/MOC may have approved within the covenant area, how would this information be kept at a district level?*

I'm guessing you also want to not just where we store these, but also if there actually are other approvals beyond the 2017-23 exploratory approvals?

(i) Where are they kept?

- Our approvals under the covenant are unlikely to have been recorded in the Permissions Database (as they are not concessions) and the days of keeping a paper file in the basement of the District Offices that outlives staff coming and going for this sort of thing are gone. Maybe there is a legacy one still in the Wanaka or CO Office that hasn't gone off to long term storage
- Pauline – you are probably best placed to know the answer to Maries question if there still is a central local vessel that might hold this info?

Out of scope



JR

---

**From:** Marie Burton  
**Sent:** Friday, 19 September 2025 8:35 am  
**To:** Carl Jones <[cajones@doc.govt.nz](mailto:cajones@doc.govt.nz)>  
**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Thanks Carl – one the of other things we need to do is pull the data on existing permissions/concessions across the PCL – we will have to do this for our report writing anyway so we may as well do it now and share that data with Satana (privacy details redacted). There is a bit of a working process for this - I will send the shape files to GIS/Anna Ginnaw's team. Any thoughts let me know.

Out of scope

s9(2)(h)

Keen to hear you thoughts.

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

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**From:** Liz Williams  
**Sent:** Friday, 19 September 2025 12:25 pm  
**To:** Marie Burton; Pene Williams; Carl Jones  
**Cc:** John Roberts; Tracey Grose  
**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback - brief legal advice re covenant conditions

In terms of affected parties, interesting question. I don't think that under the Conservation Covenant approval process that 'other landowners' that the conservation covenant applies to are consulted on decisions made by the Minister – I think this statutory process requires only approval from the Minister. I know for another conservation covenant interested parties were consulted with, but this was because they were original signatories of the covenant (Tasman Accord example). s9(2)(h) Under the Fast Track it would be the panel's decision.

For RMA considerations, affected parties approval is decided on whether the development would have more than minor effects on adjoining properties rather than other parties of the conservation covenant – this is decided on by the Council in usual process rather than DOC. So not sure it would be a consideration for our s53 comments it would be more about the effects of the activity on the values of the site that the covenant protects and whether these can be adequately avoided/remedied/mitigated/offset/compensated for in line with the policies/objs of the higher order documents - or though under the Fast Track Act this would need to be considered in light of the purpose of the Act having the greatest weight.

But approving such an activity could definitely set a precedent if the Conservation Covenant is altered/allows an activity of this scale in terms of future possible uses of land within the covenant area – could possibly cover it from this angle? I'll have a bit more of a think about this. s9(2)(h)

---

**From:** Liz Williams  
**Sent:** Friday, 19 September 2025 12:01 pm  
**To:** Marie Burton <mpayne@doc.govt.nz>; Pene Williams <pwilliams@doc.govt.nz>; Carl Jones <cjones@doc.govt.nz>  
**Cc:** John Roberts <jroberts@doc.govt.nz>; Tracey Grose <tgrose@doc.govt.nz>  
**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback - brief legal advice re covenant conditions

Hi Marie

If the covenant was revoked, then I imagine they would apply for a subdivision consent as part of their FT application to provide for an access road with a proposal to vest it to the District Council. Council would need to agree to this. Out of scope  
( ). We would definitely advocate for it to be Council that takes it on to manage/maintain as a council road – they will have particular standards in terms of grading/widths/drainage for the road based on level of use/location.

Re the covenant approvals – from my understanding there are two processes of how activities get approved within the Conservation Covenant area. One is through the local district office

whereby landowners request permission to undertake an activity under the conservation covenant and DOC provides a letter granting approval for a building platform or removal of some trees etc. The other process is where they request a partial revocation or surrender of the conservation covenant over specific parts of the site and the SLM team get involved to register this against the title/update LINZ. Out of scope

s9(2)(a)(i)

. Just to note as well – the Central Otago District Plan has rules in the plan that exclude the land that was part of the tenure review (so includes Bendigo Station/Conservation Covenant area) from the ONL and indigenous vegetation clearance rules. It is our understanding that this is because the Plan acknowledges (as a method of the Plan) that this land is protected by other mechanisms (i.e what occurred out of the land tenure reviews). So, there may be certain types of development that didn't need a resource consent as it was a permitted activity under the CODC Plan BUT that would have required approval under the conservation covenant.

Out of scope

For my s53 comments I would be looking at the conservation values the Covenant protects and stating that the relevance of the conservation covenant as the CODC Plan uses these other mechanisms as a method in the plan to protect Section 6 values. Out of scope

Does that answer your question?

Cheers  
Liz

---

**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Sent:** Friday, 19 September 2025 10:05 am

**To:** Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; Carl Jones <[cajones@doc.govt.nz](mailto:cajones@doc.govt.nz)>

**Cc:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Liz Williams <[lwilliams@doc.govt.nz](mailto:lwilliams@doc.govt.nz)>

**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback - brief legal advice re covenant conditions

Hey Pene,

s9(2)(h)

s9(2)(h)

I hope that makes sense but happy to take a call if helpful.

Kind regards,

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Rene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>

**Sent:** Friday, 19 September 2025 8:44 am

**To:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>; Carl Jones <[cajones@doc.govt.nz](mailto:cajones@doc.govt.nz)>

**Cc:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>

**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback - brief legal advice re covenant conditions

Mōrena Marie,

s9(2)(h)

Kind regards/ Kā mihi,

Pene

**Pene Williams** (she / her)

Senior Solicitor | Rōia Matua – Legal Services | Ngā Ratonga Ture  
Dunedin | Ōtepoti Office

DDI: s9(2)(a)

[www.doc.govt.nz](http://www.doc.govt.nz)

---

**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Sent:** Friday, 19 September 2025 8:35 am

**To:** Carl Jones <[cajones@doc.govt.nz](mailto:cajones@doc.govt.nz)>

**Cc:** Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>

**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

---

**From:** Marie Burton

**Sent:** Friday, 19 September 2025 8:35 am

**To:** Carl Jones <[cajones@doc.govt.nz](mailto:cajones@doc.govt.nz)>

**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Thanks Carl – one the of other things we need to do is pull the data on existing permissions/concessions across the PCL – we will have to do this for our report writing anyway so we may as well do it now and share that data with Satana (privacy details redacted). There is a bit of a working process for this - I will send the shape files to GIS/Anna Ginnaw's team. Any thoughts let me know.

John – in terms of the covenant and any approvals for activities the department/MOC may have approved within the covenant area, how would this information be kept at a district level?

s9(2)(h)

Keen to hear you thoughts.

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Carl Jones <[cjones@doc.govt.nz](mailto:cjones@doc.govt.nz)>  
**Sent:** Thursday, 18 September 2025 12:32 pm  
**To:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Hi Marie,

I have finished making some comments. There maybe other special conditions needed relative to a specific proposal when details become clearer.

Ngā mihi (*with thanks*)

**Carl Jones**

Senior Permissions Advisor | Kaitohutohu Whakaaetanga

Hokitika Shared Service Centre - *Te Wahanga Ratonga Pokapu o Hokitika*  
10 Sewell Street, Hokitika 7810

Department of Conservation - Te Papa Atawhai

s9(2)(a)

---

**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Sent:** Wednesday, 17 September 2025 6:02 pm  
**To:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Matt Schmidt <[mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz)>; Carl Jones <[cjones@doc.govt.nz](mailto:cjones@doc.govt.nz)>; Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>  
**Cc:** Liz Williams <[lwilliams@doc.govt.nz](mailto:lwilliams@doc.govt.nz)>; Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>; Tracey Grose <[tgrose@doc.govt.nz](mailto:tgrose@doc.govt.nz)>  
**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Thanks all for the feedback to date. I have made updates to the document to reflect balanced with considerations of the FTAA.  [Concessions feedback 16 Sept 2025](#)

**Matt** – keen to discuss the track proposal further with you tomorrow – I acknowledge we may not support the proposal but also aware they may just lodge the proposal as is / or propose restricting access with no new track – I am keen to get your views on this scenario. I have made it clearer that the proposed is not a desirable outcome for DOC given the Heritage values and the issue requires further engagement.

s9(2)(h)

**Carl** – Also I put some time in your calendar for review – noting that if you can also review the attachment of conditions from the conditions library and add/delete anything relevant to attachment A.

I need to get this out to the applicant tomorrow afternoon.

Kind regards,

**Marie Payne**

Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



**Department of Conservation**  
*Te Papa Atawhai*

**From:** John Roberts <jroberts@doc.govt.nz>

**Sent:** Wednesday, 17 September 2025 12:43 pm

**To:** Matt Schmidt <mschmidt@doc.govt.nz>; Marie Burton <mpayne@doc.govt.nz>; Carl Jones <cajones@doc.govt.nz>; Pene Williams <pwilliams@doc.govt.nz>; Meg Embleton-Muir <memuir@doc.govt.nz>

**Cc:** Liz Williams <lwilliams@doc.govt.nz>; Sally Clarkson <sclarkson@doc.govt.nz>; Tracey Grose <tgrose@doc.govt.nz>

**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Below from Matt is reflective of my latest comments – if we are only providing high level feedback at this time then we need to ramp our thinking up to that level and *lead* with that stuff as we would normally do with any pre-app – eg statutory tests an application needs to meet; and the things that might preclude our consideration of what is proposed (as I describe in my last email and Matt leans into below) rather than with effects/conditions

My apologies in not identifying this tack earlier - my brain has been a little too much engaged on other things the last few weeks! (Out of scope [redacted])

JR

**From:** Matt Schmidt <mschmidt@doc.govt.nz>

**Sent:** Wednesday, 17 September 2025 11:03 am

**To:** Marie Burton <mpayne@doc.govt.nz>; Carl Jones <cajones@doc.govt.nz>; Pene Williams <pwilliams@doc.govt.nz>; John Roberts <jroberts@doc.govt.nz>; Meg Embleton-Muir <memuir@doc.govt.nz>

**Cc:** Liz Williams <lwilliams@doc.govt.nz>; Sally Clarkson <sclarkson@doc.govt.nz>; Tracey Grose <tgrose@doc.govt.nz>

**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Morena all

I have read through the document and will make some changes to the track (1) and veg (2) clearance concession applications in the Bendigo Historic Reserve plus make a few edits to the SH8 (3) concession. A few mindful notes below, however, regarding our feedback for the track proposal (1).

Looking at the proposed track through the Bendigo Historic Reserve (1), there needs to be more emphasis that this place is a **Historic Reserve** and the primary values being affected by the proposal are the historic/heritage values. The importance of the historic/heritage values need to be identified clearly at the very top of the tables in the feedback and not left to the bottom. Recreational and biodiversity values are important, but the function of the Historic Reserve is to conserve the historic heritage values and the landscape in which they lie. We need to ensure that the applicant gets this.

I am also concerned that for the track through the Historic Reserve we are asking for more information to consider the proposal...why? The applicants' goal is to provide an alternate access to the Come-In-Time Battery which it does not need....so then why are we requesting more information and "...feel that it would be beneficial to further explore the existing conservation values"?

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s9(2)(g)(i)

Na

Matt



Dr Matthew Schmidt  
Senior Heritage Advisor | Kaitohu Matua Taonga Tuku Iho  
**Department of Conservation | Te Papa Atawhai**  
Ōtepoti | Dunedin Office, Level 1, John Wickliffe House, 265 Princes Street, Dunedin  
Ph. s9(2)(a) | Email [mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz) | doc.govt.nz

Our vision is for New Zealand to be the greatest living space on Earth | Kāore he wāhi i tua atu i a Aotearoa, hei wahi noho i te ao



International Correspondent for the Asia-Pacific Cultural Centre for UNESCO

**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Sent:** Wednesday, 17 September 2025 12:23 am

**To:** Carl Jones <[cajones@doc.govt.nz](mailto:cajones@doc.govt.nz)>; Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>; Matt Schmidt

<[mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz)>

Cc: Liz Williams <[lwilliams@doc.govt.nz](mailto:lwilliams@doc.govt.nz)>; Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>

Subject: Bendigo-Ophir Gold Project - Concessions feedback

Hi all,

I have collated our feedback in relation to the concessions information provided by the applicant to date. I feel like the feedback is repetitive in parts i.e. we need more information before we can really dig into these conditions – but I think that is the message we need to convey.

### Task

If you could please review by COB today (17/09/2025) it would be much appreciated – if this won't be possible please let me know and we can work out how to manage. This has been quite a big task collating all our feedback and apologies for the speedy turnaround request, I am happy to discuss this with the applicant but I am aware they have workshops with their planners today and tomorrow.

### Link

[Concessions feedback 16 Sept 2025](#)

### Notes for review

- Please review with comments and track changes
- As explained in the document the feedback is pitched at a high-level and is reflective of the timeframes provided
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- Any other comments etc...welcome

Any questions please let me know – also happy to set up a meeting to discuss in the afternoon if that's the best way to progress further.

Kind regards,

Marie

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Ataturangi*

Released under the Official Information Act

**From:** Marie Burton  
**Sent:** Thursday, 18 September 2025 1:56 pm  
**To:** Pene Williams; Matt Schmidt; John Roberts; Carl Jones; Meg Embleton-Muir  
**Cc:** Liz Williams; Sally Clarkson; Tracey Grose  
**Subject:** RE: Bendigo-Ophir Gold Project s9(2)(h)

Hey all,

Thanks for your work on this again.

Links to the PDF's being sent to the applicant are here: [☐ PDF's sent to applicant](#)

Any further questions/comments let me know.

Kind regards,

Marie

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Pene Williams <pwilliams@doc.govt.nz>  
**Sent:** Thursday, 18 September 2025 9:58 am  
**To:** Matt Schmidt <mschmidt@doc.govt.nz>; Marie Burton <mpayne@doc.govt.nz>; John Roberts <jroberts@doc.govt.nz>; Carl Jones <cajones@doc.govt.nz>; Meg Embleton-Muir <memuir@doc.govt.nz>  
**Cc:** Liz Williams <lwilliams@doc.govt.nz>; Sally Clarkson <sclarkson@doc.govt.nz>; Tracey Grose <tgrose@doc.govt.nz>  
**Subject:** RE: Bendigo-Ophir Gold Project s9(2)(h)

Ata m̄rie Marie, ata m̄rie koutou,

s9(2)(h)

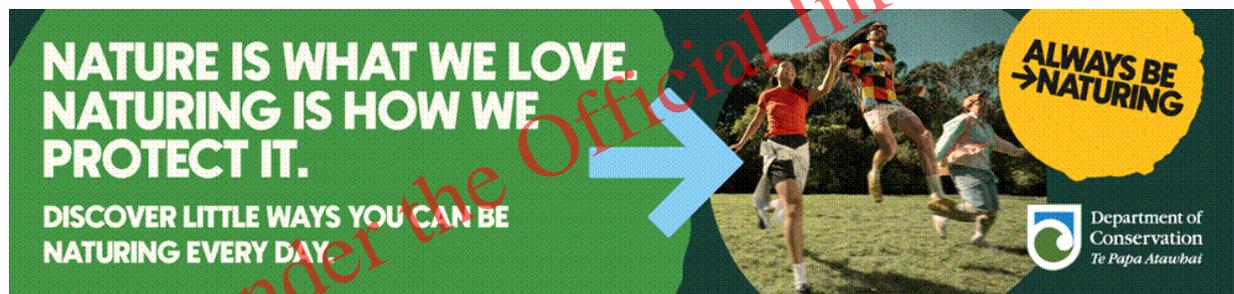
Released under the Official Information Act

s9(2)(h)

I've made some other tweaks to clarify. Talk later,

Kind regards/ Kā mihi,  
Pene

**Pene Williams** (she / her)  
Senior Solicitor | Rōia Matua – Legal Services | Ngā Ratonga Ture  
Dunedin | Ōtepoti Office  
Phone Waea DDI: s9(2)(a)  
Level 1, John Wickliffe House | 265 Princes Street | Dunedin | P O Box 5244 | Dunedin 9054  
[www.doc.govt.nz](http://www.doc.govt.nz)



**From:** Matt Schmidt <[mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz)>  
**Sent:** Thursday, 18 September 2025 9:08 am  
**To:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>; John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Carl Jones <[cjones@doc.govt.nz](mailto:cjones@doc.govt.nz)>; Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>  
**Cc:** Liz Williams <[lwilliams@doc.govt.nz](mailto:lwilliams@doc.govt.nz)>; Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>; Tracey Grose <[tgrose@doc.govt.nz](mailto:tgrose@doc.govt.nz)>  
**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

I'm free after 3pm today and tomorrow between 11.30am and 1pm.

In this instance, better to have no formed track through the Reserve to the battery than consider something that clearly has issues from the outset and has not gone through the required best practice heritage evaluation. This is not a recreation or biodiversity call, this is a heritage call as the values in the Historic Reserve will absolutely be compromised with this proposal as it stands. There are alternatives in accessing the Come-In-Time Battery, the current access is used as it is simply the closest and most convenient. If the current access was lost, we would go through the accepted track planning process through the Historic Reserve as we would for any proposed trail by a group or company.

---



Dr Matthew Schmidt  
Senior Heritage Advisor | Kaitohu Matua Taonga Tuku Iho  
**Department of Conservation | Te Papa Atawhai**  
Ōtepoti | Dunedin Office, Level 1, John Wickliffe House, 265 Princes Street, Dunedin  
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**International Correspondent for the Asia-Pacific Cultural Centre for UNESCO**

**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Sent:** Wednesday, 17 September 2025 6:02 pm

**To:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Matt Schmidt <[mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz)>; Carl Jones <[cajones@doc.govt.nz](mailto:cajones@doc.govt.nz)>; Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>

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**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Thanks all for the feedback to date. I have made updates to the document to reflect balanced with considerations of the FTAA. [Concessions feedback 16 Sept 2025](#)

**Matt** – keen to discuss the track proposal further with you tomorrow – I acknowledge we may not support the proposal but also aware they may just lodge the proposal as is / or propose restricting access with no new track – I am keen to get your views on this scenario. I have made it clearer that the proposed is not a desirable outcome for DOC given the Heritage values and the issue requires further engagement.

s9(2)(h)

**Carl** – Also I put some time in your calendar for review – noting that if you can also review the attachment of conditions from the conditions library and add/delete anything relevant to attachment A.

I need to get this out to the applicant tomorrow afternoon.

Kind regards,

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>  
**Sent:** Wednesday, 17 September 2025 12:43 pm  
**To:** Matt Schmidt <[mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz)>; Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>; Carl Jones <[cajones@doc.govt.nz](mailto:cajones@doc.govt.nz)>; Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>  
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**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Below from Matt is reflective of my latest comments – if we are only providing high level feedback at this time then we need to ramp our thinking up to that level and *lead* with that stuff as we would normally do with any pre-app – eg statutory tests an application needs to meet; and the things that might preclude our consideration of what is proposed (as I describe in my last email and Matt leans into below) rather than with effects/conditions

My apologies in not identifying this tack earlier - my brain has been a little too much engaged on other things the last few weeks! ( Out of scope )

JR

---

**From:** Matt Schmidt <[mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz)>  
**Sent:** Wednesday, 17 September 2025 11:03 am  
**To:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>; Carl Jones <[cajones@doc.govt.nz](mailto:cajones@doc.govt.nz)>; Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>  
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**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Morena all

I have read through the document and will make some changes to the track (1) and veg (2) clearance concession applications in the Bendigo Historic Reserve plus make a few edits to the SH8 (3) concession. A few mindful notes below, however, regarding our feedback for the track proposal (1).

Looking at the proposed track through the Bendigo Historic Reserve (1), there needs to be more emphasis that this place is a **Historic Reserve** and the primary values being affected by the proposal are the historic/heritage values. The importance of the historic/heritage values need to be identified clearly at the very top of the tables in the feedback and not left to the bottom. Recreational and biodiversity values are important, but the function of the Historic Reserve is to conserve the historic heritage values and the landscape in which they lie. We need to ensure that the applicant gets this.

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s9(2)(g)(i)

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Matt



Dr Matthew Schmidt  
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**Sent:** Wednesday, 17 September 2025 12:23 am  
**To:** Carl Jones <[cajones@doc.govt.nz](mailto:cajones@doc.govt.nz)>; Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>; Matt Schmidt <[mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz)>  
**Cc:** Liz Williams <[williams@doc.govt.nz](mailto:williams@doc.govt.nz)>; Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Subject:** Bendigo-Ophir Gold Project - Concessions feedback

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Kind regards,

Marie

**Marie Payne**  
Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

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## Email correspondence 51

**From:** Carl Jones  
**Sent:** Thursday, 18 September 2025 1:26 pm  
**To:** Marie Payne  
**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Hi Marie,

Suspension is normally dealt with under our standard conditions (not special) and covers wider than just a breach of condition so I'm unsure why it is suggested and how to amend so as not to conflict with the standard conditions if they would apply anyway?

Regards the contact condition and one other I have recalled please see below:

- *The concessionaire will, at least 7 days prior to undertaking works on Public Conservation Land, inform the XXX District Office at xxxx@doc.govt.nz of the date, duration and location of the proposed works.*

I don't recall this either which is likely appropriate?

- **Waste, fuels and hazardous substances**

1. *Any waste or rubbish, including organic waste, must be contained, separated at source if recyclable, placed in a designated area, removed and disposed of in an appropriate manner / at an authorised facility at regular intervals/weekly and on completion of the activity to ensure it does not become a contaminant or present a potential hazard to wildlife.*
2. *The Concessionaire will comply with all Hazardous Substances and New Zealand Organisms Act 1996 (HSNO) regulations and requirements for the storage of hazardous substances, including fuel:  
<http://www.business.govt.nz/worksafe/information-guidance/guidance-by-industry/hsno>. Storing greater than 50 litres of petrol will require approval from the Grantor.*
3. *The Concessionaire will ensure that any refuelling, lubrication and/or maintenance and mechanical repairs on any machinery are undertaken in an appropriate area where any spillages can be contained. No refuelling is to take place within 10m of any waterway.*
4. *In the event of any hazardous substance spill the Concessionaire must:*
  - (a) *Take all practicable measures to stop the flow of the substances and prevent further contamination of Land or water; and*
  - (b) *Immediately contain, collect and remove the hazardous substances and any contaminated material, and dispose of all such material in an appropriate manner / at an authorised facility; and*
  - (c) *Notify the Grantor as soon as practicable; and*
  - (d) *Undertake any remedial action to restore any damage to the soil; and*
  - (e) *Take all measures to prevent any reoccurrence.*
5. *The Concessionaire is not permitted to light any open fires on the Land.*

Ngā mihi (with thanks)

**Carl Jones**

Senior Permissions Advisor | Kaitohutohu Whakaaetanga

Hokitika Shared Service Centre - *Te Wahanga Ratonga Pokapu o Hokitika*

10 Sewell Street, Hokitika 7810

Department of Conservation - Te Papa Atawhai

Tel: s9(2)(a)

---

**From:** Marie Burton <mpayne@doc.govt.nz>

**Sent:** Thursday, 18 September 2025 12:55 pm

**To:** Carl Jones <cajones@doc.govt.nz>

**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Thanks Carl really helpful feedback.

- In relation to the remediation of a breach comment – shall I remove that or do I need to add Suspension (Remediation of a breach of condition) in the heading to clarify?
- In relation to your comment about adding in a condition to notify before start of works do you have an example I can add in?

Once we have addressed these points I think we are good to go. Thanks again.

Kind regards,

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Carl Jones <cajones@doc.govt.nz>

**Sent:** Thursday, 18 September 2025 12:32 pm

**To:** Marie Burton <mpayne@doc.govt.nz>

**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Hi Marie,

I have finished making some comments. There maybe other special conditions needed relative to a specific proposal when details become clearer.

Ngā mihi (*with thanks*)

**Carl Jones**

Senior Permissions Advisor | Kaitohutohu Whakaaetanga

Hokitika Shared Service Centre - *Te Wahanga Ratonga Pokapu o Hokitika*

10 Sewell Street, Hokitika 7810

Department of Conservation - Te Papa Atawhai

Tel: s9(2)(a)

---

**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Sent:** Wednesday, 17 September 2025 6:02 pm

**To:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Matt Schmidt <[mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz)>; Carl Jones <[cajones@doc.govt.nz](mailto:cajones@doc.govt.nz)>; Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>

**Cc:** Liz Williams <[lwilliams@doc.govt.nz](mailto:lwilliams@doc.govt.nz)>; Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>; Tracey Grose <[tgrose@doc.govt.nz](mailto:tgrose@doc.govt.nz)>

**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

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s9(2)(h)

**Carl** – Also I put some time in your calendar for review – noting that if you can also review the attachment of conditions from the conditions library and add/delete anything relevant to attachment A.

I need to get this out to the applicant tomorrow afternoon.

Kind regards,

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

Email correspondence 52

**From:** Marie Burton  
**Sent:** Thursday, 18 September 2025 10:29 am  
**To:** Matt Schmidt  
**Cc:** John Roberts  
**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Thanks Matt,

And thank you for your input, I have amended our response placing much greater empathises on the points you raise and hopefully this opens the door to further discussion with the applicant rather than them continuing with the proposal.

I'll try and give you a call at 3pm but if its tomorrow no problem.

Kind regards,

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanqanui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Matt Schmidt <mschmidt@doc.govt.nz>  
**Sent:** Thursday, 18 September 2025 8:55 am  
**To:** Marie Burton <mpayne@doc.govt.nz>  
**Cc:** John Roberts <jroberts@doc.govt.nz>  
**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Morena Marie

I am at a hui but will try and find some time today.

- Tracks through Historic Reserves need detailed planning as you really need to plan carefully what outcome you are seeking, what experience are you wanting and the impacts on heritage and the landscape. s9(2)(a)(i)

[Redacted content]

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- Recreation's views have little weight for this application. This is a Historic Reserve and intimate knowledge of where and why new tracks will go through a Reserve is a heritage call. I know this area very well, so rec can't really comment on the appropriateness of a track through a Historic Reserve unless they have visited the location and gone through the planning process with heritage as the lead.
- [REDACTED] s9(2)(g)(i) [REDACTED]  
[REDACTED] If, for example, a cycleway group put in an application for this track with the lack of info and discussion beforehand with DOC, DOC would likely send the proposal back.

Na

Matt



Dr Matthew Schmidt  
Senior Heritage Advisor | Kaitohu Matua Taonga Tuku Iho  
Department of Conservation | Te Papa Atawhai  
Ōtepoti | Dunedin Office, Level 1, John Wickliffe House, 265 Princes Street, Dunedin  
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International Correspondent for the Asia-Pacific Cultural Centre for UNESCO

**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Sent:** Wednesday, 17 September 2025 3:20 pm  
**To:** Matt Schmidt <[mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz)>  
**Cc:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>  
**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Hey Matt,

Keen to catch up quickly when you have a spare 5 minutes. A couple of points I just want to talk through more with you:

- If it came down to it – would it be better to have no alternative track, i.e. if they simply proposed to cut of the existing access to the reserve?
- Out of scope  
[REDACTED]

Kind regards,

Marie

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Matt Schmidt <[mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz)>

**Sent:** Wednesday, 17 September 2025 11:03 am

**To:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>; Carl Jones <[cajones@doc.govt.nz](mailto:cajones@doc.govt.nz)>; Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>

**Cc:** Liz Williams <[lwilliams@doc.govt.nz](mailto:lwilliams@doc.govt.nz)>; Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>; Tracey Grose <[tgrose@doc.govt.nz](mailto:tgrose@doc.govt.nz)>

**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Morena all

I have read through the document and will make some changes to the track (1) and veg (2) clearance concession applications in the Bendigo Historic Reserve plus make a few edits to the SH8 (3) concession. A few mindful notes below, however, regarding our feedback for the track proposal (1).

Looking at the proposed track through the Bendigo Historic Reserve (1), there needs to be more emphasis that this place is a **Historic Reserve** and the primary values being affected by the proposal are the historic/heritage values. The importance of the historic/heritage values need to be identified clearly at the very top of the tables in the feedback and not left to the bottom. Recreational and biodiversity values are important, but the function of the Historic Reserve is to conserve the historic heritage values and the landscape in which they lie. We need to ensure that the applicant gets this.

I am also concerned that for the track through the Historic Reserve we are asking for more information to consider the proposal...why? The applicants' goal is to provide an alternate access to the Come-In-Time Battery which it does not need....so then why are we requesting more information and "...feel that it would be beneficial to further explore the existing conservation values"?

If this track proposal was to provide access to or promote a particular heritage value or heritage aspect of the Historic Reserve that has not been provided for previously and warrants more infrastructure in the landscape to access it, then we would consider such an application, but this concession is not for that purpose. In addition, for a track proposal through a Historic Reserve, we would typically meet on site with the applicant even before giving feedback on an application and, from that visit, whether the idea is

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going to fly or not will be made clear. In this case, a site visit is not required as the proposal does not have any merit in the first place.

s9(2)(g)(i)

Na

Matt



Dr Matthew Schmidt  
Senior Heritage Advisor | Kaitohu Matua Taonga Tuku Iho  
**Department of Conservation | Te Papa Atawhai**  
Ōtepoti | Dunedin Office, Level 1, John Wickliffe House, 265 Princes Street, Dunedin  
Ph. s9(2)(a) | Email [mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz) | doc.govt.nz

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International Correspondent for the Asia-Pacific Cultural Centre for UNESCO

**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Sent:** Wednesday, 17 September 2025 12:23 am

**To:** Carl Jones <[cjones@doc.govt.nz](mailto:cjones@doc.govt.nz)>; Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>; Matt Schmidt <[mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz)>

**Cc:** Liz Williams <[lwilliams@doc.govt.nz](mailto:lwilliams@doc.govt.nz)>; Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>

**Subject:** Bendigo-Ophir Gold Project - Concessions feedback

Hi all,

I have collated our feedback in relation to the concessions information provided by the applicant to date. I feel like the feedback is repetitive in parts i.e. we need more information before we can really dig into these conditions – but I think that is the message we need to convey.

### Task

If you could please review by COB today (17/09/2025) it would be much appreciated – if this won't be possible please let me know and we can work out how to manage. This has been quite a big task collating all our feedback and apologises for the speedy turnaround request, I am happy to discuss this with the applicant but I am aware they have workshops with their planners today and tomorrow.

## Link

[Concessions feedback 16 Sept 2025](#)

## Notes for review

- Please review with comments and track changes
- As explained in the document the feedback is pitched at a high-level and is reflective of the timeframes provided
- Meg – there are some recreational comments you might want to flick your eye over, they convey our discussion yday and I am sure John can input too.
- Attachment A) takes example conditions from the FT conditions library which was prepared by policy and legal based on existing approvals – I have pulled out what may be relevant but [@Carl Jones](#) [@Pene Williams](#) I would appreciate if you could reflect on the conditions library and add in anything else that's relevant/delete anything that isn't relevant in to this attachment. The conditions library can be found here: [docCM - Fast Track Approvals Conditions Library](#).
- In the cover email I will advocate that we work through these issues as part of further engagement and provided we get more info or time to review the info provided further we can become more specific – ideally, we want to see an application document for the concessions
- Although our preference would potentially be that some of these proposals aren't concessions, they could apply as is and we have to consider that as we feedback
- The Section 78 conditions have been approved by MOC the 'draft' watermark on the document is in relation to the guidance note which Siobhan and Jenni are 'approving' tomorrow – previously reviewed by legal although it has been amended slightly during sign out since legal review
- Any other comments etc...welcome

Any questions please let me know – also happy to set up a meeting to discuss in the afternoon if that's the best way to progress further.

Kind regards,

Marie

## Marie Payne

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)

## Email correspondence 53

**From:** Marie Burton  
**Sent:** Wednesday, 17 September 2025 2:50 pm  
**To:** John Roberts; Carl Jones; Pene Williams; Meg Embleton-Muir; Matt Schmidt  
**Cc:** Liz Williams; Sally Clarkson  
**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Thanks John (and Matt),

I am going through the feedback now. Just an initial observation, although part 3B of the Conservation act is a criteria for assessment again the greatest weight is given to the purpose of the FTAA, which means that they don't need to meet all of the tests in the Cons Act as they normally would for a concession/they are not considered in the same way (I don't believe the applicant has to provide commentary on this as part of a concession application either).

I do remain conscious of framing too given an applicant can technically make the applications whether we support the specific activity or not, so our feedback needs to be focused on how we would assess that proposal in the context of the act for decision makers to consider (being transparent about that) and ideally open the door for further discussion now.

As I go through the feedback, I will sharpen it in line with the requirements of the FTAA noting your points below John (and Matt) I will also advocate for a workshop type situation to work through these issues as part of the response.

The other note is the 3<sup>rd</sup> party engagement, as engagement is very prescribed in the act we can't direct them to engage with a 3<sup>rd</sup> party pre-lodgement but we can advocate for it, we also can't undertake that engagement as part of our process either (particularly given constraints on sharing information).

I'll get back to everyone with a reviewed document.

Kind regards,

Marie

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



# Department of Conservation

## *Te Papa Atawhai*

**From:** John Roberts <jroberts@doc.govt.nz>

**Sent:** Wednesday, 17 September 2025 12:24 pm

**To:** Marie Burton <mpayne@doc.govt.nz>; Carl Jones <cajones@doc.govt.nz>; Pene Williams <pwilliams@doc.govt.nz>; Meg Embleton-Muir <memuir@doc.govt.nz>; Matt Schmidt <mschmidt@doc.govt.nz>

**Cc:** Liz Williams <lwilliams@doc.govt.nz>; Sally Clarkson <sclarkson@doc.govt.nz>

**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Hi Marie – my comments below (and a few others) are inserted into the shared document.  [Concessions feedback 16 Sept 2025](#)

Appreciate the balance here of providing high level feedback at this time and not getting too much into the detail at this time – so I've tried to ramp my comments to the big-ticket tests that an application needs to meet – see below – rather than assuming we will simply go down the track of looking at effects and conditions with our comments pitched in that direction right off the bat.

### **Big picture things:**

s9(2)(g)(i)

- (i) CIT - they really need to consider alternatives to the proposed new access track to the CIT battery – a look at the map and sat photo shows other access possible, mostly across Bendigo Station lands (instead of pcl as proposed).
  - Good that we can link this point to s17U(4) of the Cons Act as one of the tests to meet for us to grant a concession. They have not explored that test.

-

*The Minister shall not grant any application for a concession to build a structure or facility, or to extend or add to an existing structure or facility, where he or she is satisfied that the activity—*

*(a) could reasonably be undertaken in another location that—*

*(i) is outside the conservation area to which the application relates; or*

(ii) is in another conservation area or in another part of the conservation area to which the application relates, where the potential adverse effects would be significantly less

(i) State Highway 8 -- seeking a 10 yr concession for (essentially) an in perpetuity state highway upgrade is odd – they need to consider a disposal of the pcl required, do the physical work and have NZTA take over

- Pene may take a different view but we can link the need to meet the test of S17U(3) *The Minister shall not grant an application for a concession if the proposed activity is contrary to the provisions of this Act or the purposes for which the land concerned is held.*
- The pcl surrounding the Lindis Bridge is section 25 stewardship
- The high level test = While stewardship land does not yet have a specific Purpose we are required to *manage* it consistent with s25 *Management of stewardship areas - Every stewardship area shall so be managed that its natural and historic resources are protected.* We could take the view that issuing a concession to turn pcl into a state highway upgrade is unlikely to be consistent with s25 and so we recommend that disposal be explored by Santana as a better option. More costly for Santana that just seeking a concession

(ii) Ardgour CA - likewise with the replacing of the CODC administered TG Road.

- What they should do is explore disposal of the bit of pcl they need for the replacement of this through the Ardgour CA , do the upgrade and have the CODC take it over. More costly for Santana that just seeking a concession

(iii) Stakeholder engagement

- If they still seek concessions for these activities, they would need to engage well with stakeholder groups ahead of lodging concession applications – the OGHT; hunter and 4WD clubs – and demonstrate to us that the adverse effects on those rec and historic values have been identified and can be managed

Test = s17U ( c) *any measures that can reasonably and practicably be undertaken to avoid, remedy, or mitigate any adverse effects of the activity and*

s17U2(a) *The Minister may decline any application if the Minister considers that—(a) the information available is insufficient or inadequate to enable him or her to assess the effects (including the effects of any proposed methods to avoid, remedy, or mitigate the adverse effects) of any activity, structure, or facility;*

Hope this is helpful

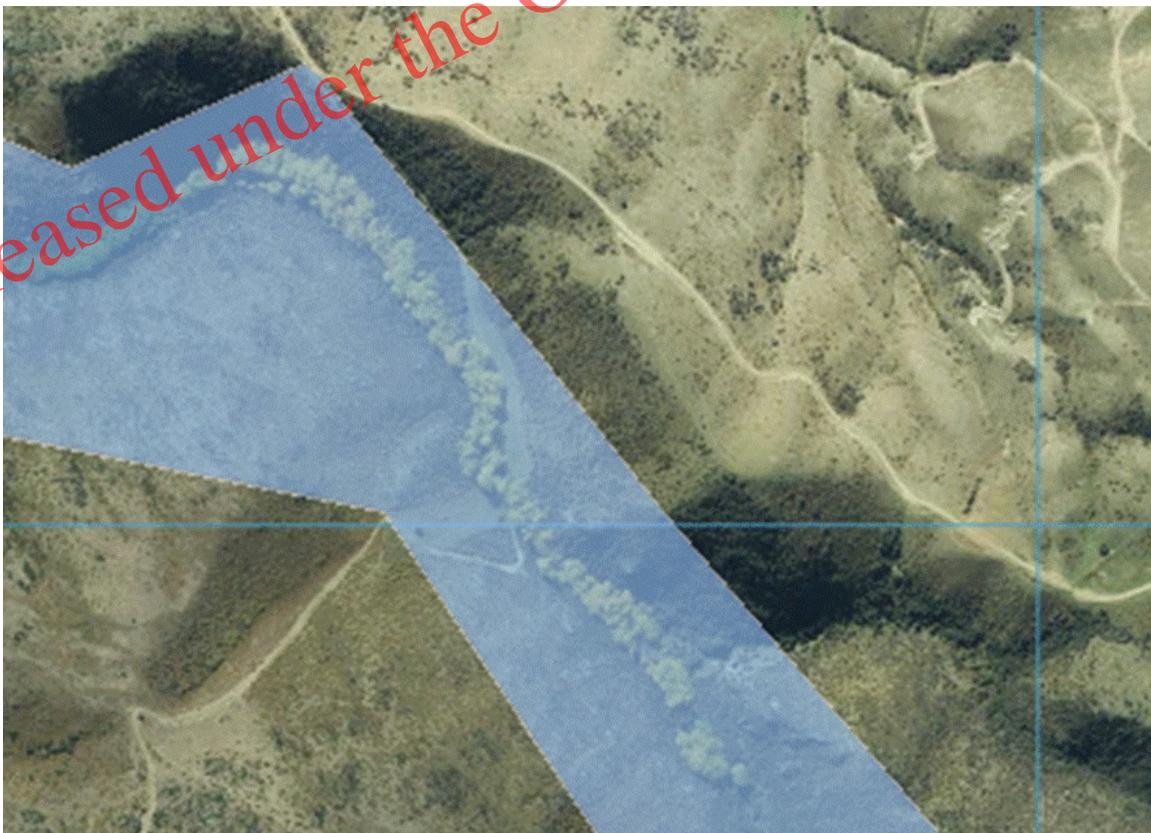
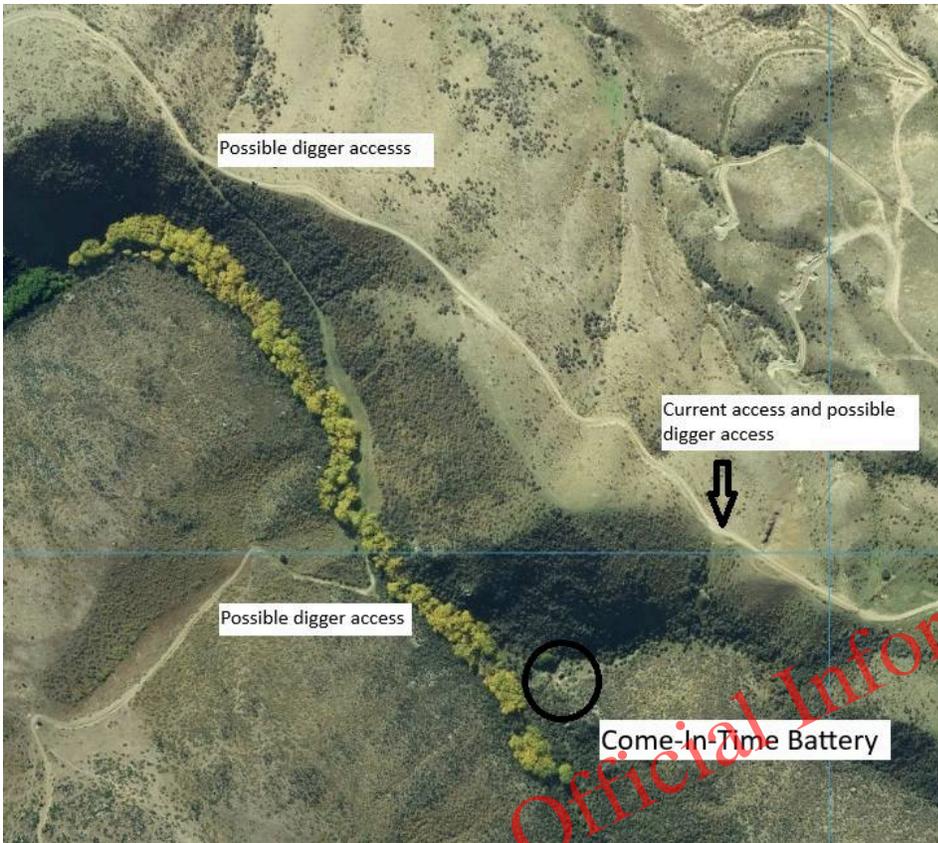
## Email correspondence 54

**From:** Matt Schmidt  
**Sent:** Wednesday, 17 September 2025 12:43 pm  
**To:** John Roberts; Marie Burton; Carl Jones; Pene Williams; Meg Embleton-Muir  
**Cc:** Liz Williams; Sally Clarkson  
**Subject:** RE: Bendigo-Ophir Gold Project - Concessions feedback

Yes, plenty of alternatives are possible IF a historic recreational access was needed but wander at will in the Reserve up the creeks is one of the drawcards as people can discover heritage sites in the landscape.

FYI. Below is a map of alternative access points discussed I think in 2024 when DOC & OGHT were looking at using a digger to fix the stone walls at CIT Battery.

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Dr Matthew Schmidt  
Senior Heritage Advisor | Kaitohu Matua Taonga Tuku Iho  
**Department of Conservation | Te Papa Atawhai**  
Ōtepoti | Dunedin Office, Level 1, John Wickliffe House, 265 Princes Street, Dunedin  
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**Sent:** Wednesday, 17 September 2025 12:24 pm

**To:** Marie Burton <mpayne@doc.govt.nz>; Carl Jones <cajones@doc.govt.nz>; Pene Williams <pwilliams@doc.govt.nz>; Meg Embleton-Muir <memuir@doc.govt.nz>; Matt Schmidt <mschmidt@doc.govt.nz>

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-

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JR

---

**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Sent:** Wednesday, 17 September 2025 12:23 am  
**To:** Carl Jones <[cajones@doc.govt.nz](mailto:cajones@doc.govt.nz)>; Pene Williams <[pwilliams@doc.govt.nz](mailto:pwilliams@doc.govt.nz)>; John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>; Matt Schmidt <[mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz)>  
**Cc:** Liz Williams <[lwilliams@doc.govt.nz](mailto:lwilliams@doc.govt.nz)>; Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Subject:** Bendigo-Ophir Gold Project - Concessions feedback

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- Any other comments etc...welcome

Any questions please let me know – also happy to set up a meeting to discuss in the afternoon if that's the best way to progress further.

Kind regards,

Marie

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

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## Email correspondence 55

**From:** Marie Burton  
**Sent:** Friday, 19 September 2025 11:08 am  
**To:** Lynnell Greer; Meg Embleton-Muir  
**Subject:** RE: Bendigo Ophir Gold - Fast-track project

Hi Lynnell,

The 7<sup>th</sup> of October will work 😊

Let me know if there is anything specific or any particular questions you/the team would like me to cover off, otherwise I'll provide an overview and we can just have a Q&A / discussion following.

Kind regards,

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Lynnell Greer <lgreer@doc.govt.nz>  
**Sent:** Wednesday, 17 September 2025 3:46 pm  
**To:** Marie Burton <mpayne@doc.govt.nz>; Meg Embleton-Muir <memuir@doc.govt.nz>  
**Subject:** RE: Bendigo Ophir Gold - Fast-track project

Hi Marie,

Thank you. The team had an introduction before the work started but it would be good for a refresher now we have 5 on the books.

How are you places for Tuesdays 30 Sept or 7<sup>th</sup> Oct at 11.30am?

The team has a regular session for discussions on these improve/ change of management subjects.

Let me know and I'll send an invite.

Thanks for the offer.  
Lynnell

---

**From:** Marie Burton <mpayne@doc.govt.nz>  
**Sent:** Wednesday, 17 September 2025 3:04 pm  
**To:** Lynnell Greer <lgreer@doc.govt.nz>; Meg Embleton-Muir <memuir@doc.govt.nz>  
**Subject:** Re: Bendigo Ophir Gold - Fast-track project

Hi Lynnell,

We met with Meg who provided some really helpful feedback. In that discussion Meg mentioned that exposure to Fast-track processes had been limited to date for your team.

If it would be helpful I'm happy to meet with the team and provide a Fast-track overview and where recreation input will likely fit into the process?

I am away next week but available after that, it would perhaps be 30/45 min session.

Kind regards,

Marie  
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---

**From:** Lynnell Greer <lgreer@doc.govt.nz>  
**Sent:** Monday, September 15, 2025 12:48:10 PM  
**To:** Marie Burton <mpayne@doc.govt.nz>; Meg Embleton-Muir <memuir@doc.govt.nz>

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Cc: Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Subject:** RE: Bendigo Ophir Gold - Fast-track project

Hi Marie,

I am looping Meg into this discussion as she will connect with you and work it through.

Thanks Lynnell

---

**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Sent:** Monday, 15 September 2025 11:51 am  
**To:** Lynnell Greer <[lgreer@doc.govt.nz](mailto:lgreer@doc.govt.nz)>  
**Cc:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Subject:** RE: Bendigo Ophir Gold - Fast-track project

Hey Lynnell,

Apologies I was trying to catch you to discuss this last week but it didn't line up.

But yes, I think you have captured below, this one is probs a 'medium' in terms of rec input now. We have some tasks we would like to progress with e.g. the applicant has provided the recreational assessments as below and has also identified they wish to relocate walking tracks and limit public access – we would like to understand the impacts of these proposals.

We have also been working closely with District Ops (John Roberts) and Matt Schmitt (Heritage), who are both in the project team (although Matt is seeking to use an external to support). Both have some recreational oversight too.

If its helpful, please give me a call today I am relatively free.

Kind regards,

Marie

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Lynnell Greer <[lgreer@doc.govt.nz](mailto:lgreer@doc.govt.nz)>  
**Sent:** Thursday, 4 September 2025 3:59 pm  
**To:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Cc:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Subject:** RE: Bendigo Ophir Gold - Fast-track project

Hi Marie,

Thanks for this.

Still keen to understand timeframe for immediate work verse longer timeframe.

Currently we have three applications in SSI all on Meg – **Out of scope** and this one (probably somewhere in between)?

Keen to understand to manage workloads as it might need to go to another team member.

Thanks Lynnell

---

**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Sent:** Thursday, 4 September 2025 3:22 pm  
**To:** Lynnell Greer <[lgreer@doc.govt.nz](mailto:lgreer@doc.govt.nz)>

**From:** Marie Burton  
**Sent:** Thursday, 18 September 2025 2:21 pm  
**To:** Nicholas Dunn  
**Cc:** Emily Funnell  
**Subject:** RE: Placeholder meeting on Wildlife Approvals - Bendigo H

Hi Nicholas,

As mentioned in the meeting earlier I have asked the applicant to confirm and they have not yet got back to me, I followed this up again this morning. I'll let you know as soon as I have an update.

Kind regards,

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Nicholas Dunn <ndunn@doc.govt.nz>  
**Sent:** Thursday, 18 September 2025 2:10 pm  
**To:** Marie Burton <mpayne@doc.govt.nz>  
**Cc:** Emily Funnell <efunnell@doc.govt.nz>  
**Subject:** RE: Placeholder meeting on Wildlife Approvals - Bendigo H

Hi Marie,

Just following up on this, could you please confirm whether or not freshwater matters will be discussed at this meeting on Monday 22 September. If fish passage is to be discussed, another freshwater person may need to be organised to attend this meeting as well.

Regards

Nicholas

-----Original Appointment-----

**From:** Marie Burton <mpayne@doc.govt.nz>  
**Sent:** Friday, 12 September 2025 16:15  
**To:** Warren Chinn; Rogan Colbourne; Nicholas Dunn; Mandy Tocher  
**Cc:** DLVC\_FIELDLAB - MAX M L CROWE; Charlotte Grey; Darcy Liddell  
**Subject:** Placeholder meeting on Wildlife Approvals - Bendigo H

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**When:** Monday, 22 September 2025 13:00-15:00 (UTC+12:00) Auckland, Wellington.

**Where:** Microsoft Teams Meeting

Hey team,

Just putting a placeholder in here for meetings re-wildlife with the applicants' ecologists. Warren/Rogan (apologies I noted that your preferred was Tues but just realised I am on leave – will this work?) Charlotte, Darcy is away this week, but I wondered if you might be about to step in for the meeting (I can brief you) just in case any permissions focused questions pop up.

Nicholas I will confirm whether they will be seeking to discuss Freshwater species/approvals in this meeting – noting your calendar is blocked out so a separate meeting on this (if required would work better?). Max I also wondered whether these meetings would overlap with your expertise and whether for fullness you should attend.

Kind regards,

Marie

---

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s9(2)(k)

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**Dial in by phone**

s9(2)(k)



Department of Conservation  
*Te Papa Atawhai*

[Org help](#) | [Privacy and security](#)

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## Email correspondence 57

**From:** Pauline Marshall  
**Sent:** Wednesday, 17 September 2025 11:26 am  
**To:** John Roberts  
**Subject:** Peer Review Request - Response Letter - Public Enquiry - MGL - Bendigo CC  
**Attachments:** Response Letter - s9(2)(a) - Bendigo Conservation Covenant - September 2025.docx; FW: Santana at Bendigo

Hi JR,

Could you please do a quick review of my draft letter (attached)? After some consideration I have decided to keep it short and sweet.

Feel free to comment/edit.

PS – I have also attached the original email enquiry for reference.

Thanks,  
Pauline

---

**From:** John Roberts <jroberts@doc.govt.nz>  
**Sent:** Wednesday, 3 September 2025 4:30 pm  
**To:** Pauline Marshall <pamarshall@doc.govt.nz>  
**Cc:** Andrew Watt <awatt@doc.govt.nz>  
**Subject:** Hey Pauline - welcome back - want some work?

Ha! A couple of Bendigo things have come in – both fairly straightforward but I'm struggling to get to them

- Out of scope

- A reply to a question that is not an OIA but still needs some thought given to the reply to give the right context re- our landscape assessment of previous exploration proposals up to but not including SRX– see attached .

How are you placed to do these?

The Head one needs to be done by the 19<sup>th</sup> Sept.

Let me know

Thanks

JR

**From:** Meg Embleton-Muir  
**Sent:** Tuesday, 16 September 2025 4:28 pm  
**To:** Sally Clarkson  
**Subject:** RE: Rec Values - FW: In confidence - Proposed Santana /Bendigo concessions on pcl to come out of FT - our chance for pre-app comment on these now - includes brief legal comments

s9(2)(a)

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**From:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Sent:** Tuesday, 16 September 2025 4:10 pm  
**To:** Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>  
**Subject:** RE: Rec Values - FW: In confidence - Proposed Santana /Bendigo concessions on pcl to come out of FT - our chance for pre-app comment on these now - includes brief legal comments

Hi Meg,

I have not seen the Boffa Miskell Mine Rehabilitation Plan for Recreation referred to in the Rec Assessment. This sort of thing, unfortunately, has happened a few times (documents referred to but not provided to DOC, yet).

I will follow up with Santana and let you know. I'll also check about the report date (suspect it's a typo).

Sally

---

**From:** Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>  
**Sent:** Tuesday, 16 September 2025 3:43 pm  
**To:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Subject:** RE: Rec Values - FW: In confidence - Proposed Santana /Bendigo concessions on pcl to come out of FT - our chance for pre-app comment on these now - includes brief legal comments

Thanks Sally, this report refers to a PDF appendix from Boffa Miskell on site reinstatement but it's not included in the document. Was it provided, and if not, could we get a copy in order to comment on the report. I also note that the report says is 2025 but the cover says June 2024. Could you confirm with the applicant that's the current before we comment? Thanks!

---

**From:** Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Sent:** Monday, 15 September 2025 4:39 pm  
**To:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>  
**Cc:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Subject:** RE: Rec Values - FW: In confidence - Proposed Santana /Bendigo concessions on pcl to come out of FT - our chance for pre-app comment on these now - includes brief legal comments

Hi Meg

See the link below for the Recreation Assessment we have received from the applicant.

 [Matakanui Bendigo-Ophir recreation assessment Final 12 June 2025.pdf](#)

Regards  
Sally

---

**From:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>  
**Sent:** Monday, 15 September 2025 4:23 pm  
**To:** Meg Embleton-Muir <[memuir@doc.govt.nz](mailto:memuir@doc.govt.nz)>  
**Cc:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>; Sally Clarkson <[sclarkson@doc.govt.nz](mailto:sclarkson@doc.govt.nz)>  
**Subject:** Rec Values - FW: In confidence - Proposed Santana /Bendigo concessions on pcl to come out of FT - our chance for pre-app comment on these now - includes brief legal comments

Hi Meg – thanks for joining the team - see the 4 x concession proposals – the CIT Battery and the new road to Thomsons Saddle being the key ones where rec values come in.

See Matt Schmidt's feedback attached about the CIT proposal

There may be a recent Santana produced Rec Values report (that considers the wider covenant area for which we will be making comment on also) to support their FT application that is available for our viewing – Sally or Marie best placed to point you at that if this is the case.

See the PDF attached that is the original summary of values at Bendigo that informed the early version of tenure review back in the 1990's. There is mention of rec values on pages 13-14. Although very dated in some ways perhaps not much has changed – the values associated with the access provided by the Thomsons Gorge road – 4WD access over Thomsons Saddle and access to the surrounding conservation areas for heritage appreciation (including on Bendigo Station as allowed for in the covenant especially in the Rise and Shine Area) walking etc

JR

---

**From:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>  
**Sent:** Tuesday, 9 September 2025 12:37 pm  
**To:** Charlie Sklenar <[csklenar@doc.govt.nz](mailto:csklenar@doc.govt.nz)>; Tracey Grose <[tgrose@doc.govt.nz](mailto:tgrose@doc.govt.nz)>  
**Subject:** In confidence - Proposed Santana /Bendigo concessions on pcl to come out of FT - our chance for pre-app comment on these now - includes brief legal comments

Hi both – see these draft proposals from Santana for activity they seek on pcl in the Bendigo area

- Changing the access to the Come In Time Battery to go through the Bendigo Historic Reserve
- Changing the alignment of the Thomsons Gorge Road from the valley to move it to the north via Ardgour Station and then through the Ardgour Cons Area dropping down to Thomsons Saddle
- Changing the alignment of the State Highway at the Lindis Bridge, needing some of the adjoining pcl at that area
- Willow removal through the Bendigo Historic Reserve and associated MS of the Bendigo Creek

## Email correspondence 59

**From:** Marie Burton  
**Sent:** Tuesday, 16 September 2025 7:13 am  
**To:** Sally Clarkson; John Roberts  
**Subject:** RE: Rec Values - FW: In confidence - Proposed Santana /Bendigo concessions on pcl to come out of FT - our chance for pre-app comment on these now - includes brief legal comments

Thanks both,

Just a quick note – when we are sending project files can we always make sure we are linking to the workflow channel (I know it's not an issue for the rec report in this case), just to ensure that everyone is seeing the latest version of the documents. I've added Meg to the teams channel too.

Out of scope

Kind regards,

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Sally Clarkson <sclarkson@doc.govt.nz>  
**Sent:** Monday, 15 September 2025 4:39 pm  
**To:** John Roberts <jroberts@doc.govt.nz>; Meg Embleton-Muir <memuir@doc.govt.nz>  
**Cc:** Marie Burton <mpayne@doc.govt.nz>  
**Subject:** RE: Rec Values - FW: In confidence - Proposed Santana /Bendigo concessions on pcl to come out of FT - our chance for pre-app comment on these now - includes brief legal comments

Hi Meg

See the link below for the Recreation Assessment we have received from the applicant.

 [Matakanui Bendigo-Ophir recreation assessment Final 12 June 2025.pdf](#)

Regards  
Sally

---

**From:** John Roberts <jroberts@doc.govt.nz>  
**Sent:** Monday, 15 September 2025 4:23 pm  
**To:** Meg Embleton-Muir <memuir@doc.govt.nz>  
**Cc:** Marie Burton <mpayne@doc.govt.nz>; Sally Clarkson <sclarkson@doc.govt.nz>

**From:** Marie Burton  
**Sent:** Tuesday, 16 September 2025 3:54 pm  
**To:** Jenni Fitzgerald  
**Subject:** RE: Priority project updates

Bendigo

- The applicant has advised they plan to lodge at the end of Sept; however, this seems unlikely given the timing of upcoming workshops.
- DOC has received several draft assessments and partial application information from the applicant over the last 1-2 months.
- DOC's project team has been providing feedback on these assessments in the context of the FTAA whilst identifying any key considerations/critical issues.
- The applicant is hosting technical workshops the first is for Wildlife and scheduled next week.
- The applicants draft application documents indicate that they will seek to amend and not completely revoke the existing covenant (previously unknown).
- There is a high level of media attention/public interest continues for this project
- We are in the process of setting up a meeting with District and Regional Councils to discuss application.

Out of scope



Kind regards,

Marie

**Marie Payne**  
Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

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**From:** Jenni Fitzgerald <jefitzgerald@doc.govt.nz>

**Sent:** Tuesday, 16 September 2025 2:46 pm

**To:** Amy Robinson <arobinson@doc.govt.nz>

**Cc:** Marie Burton <mpayne@doc.govt.nz>

**Subject:** RE: Priority project updates

Out of scope

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**From:** Amy Robinson <amrobinson@doc.govt.nz>

**Sent:** Tuesday, 16 September 2025 2:45 pm

**To:** Jenni Fitzgerald <jefitzgerald@doc.govt.nz>

**Cc:** Marie Burton <mpayne@doc.govt.nz>

**Subject:** RE: Priority project updates

Out of scope

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**From:** Jenni Fitzgerald <jefitzgerald@doc.govt.nz>

**Sent:** Tuesday, 16 September 2025 2:35 pm

**To:** Emma Fahey <efahey@doc.govt.nz>; Marie Burton <mpayne@doc.govt.nz>; Asher Cook <acook@doc.govt.nz>; Amelia Wilkinson <amwilkinson@doc.govt.nz>; Gen Hewett <ghewett@doc.govt.nz>

**Cc:** Amy Robinson <arobinson@doc.govt.nz>

**Subject:** Priority project updates

Hi all

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Can I please have a short para on each of your projects as listed below? This is for the FT Governance Group meeting and I need to circulate tomorrow (sorry). I just need high level – e.g. what it is, where it's up to and key risks/issues. Going forward, these will be used to inform any escalation (e.g. to Penny or MOC) and will happen monthly.

Out of scope



Bendigo

Out of scope



**Jenni Fitzgerald**

Manager Fast Track Applications

Te Papa Atawhai | Department of Conservation

Whare Kaupapa Atawhai | Conservation House

18 - 32 Manners St | PO Box 10 420, Wellington 6143

Phone: +s9(2)(a)

[www.doc.govt.nz](http://www.doc.govt.nz)

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**From:** Marie Burton  
**Sent:** Tuesday, 16 September 2025 2:49 pm  
**To:** Sally Clarkson  
**Subject:** RE: Recreation Assessment - Bendigo

Thanks Sally,

So it sounds like there effects assessment is broad and they haven't drilled down into the detail of effects of each concession e.g. how safe are the proposed tracks/how much would they be used?

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

---

**From:** Sally Clarkson <sclarkson@doc.govt.nz>  
**Sent:** Tuesday, 16 September 2025 2:24 pm  
**To:** Marie Burton <mpayne@doc.govt.nz>  
**Subject:** Recreation Assessment - Bendigo

Hi Marie

I've just had another look through this assessment with concessions and their effects, in mind. I note the following:

- The report acknowledges that a concession is expected to be obtained through the FT process to ensure access is provided for the public over the southern end of Ardgour Conservation Area (as proposed for alternate access to Thomson Gorge Rd)
- Report assesses expected effects but does not seem to tie them directly to concessions sought
- Report assesses visual amenity effects on visitors to the Bendigo Historic Reserve; and noise, traffic, explosion hazards and lighting effects in relation to publicly accessible areas
- Report assesses existing recreational values, and those values expected as a result of the proposal

Does that help at all?

**Sally Clarkson**

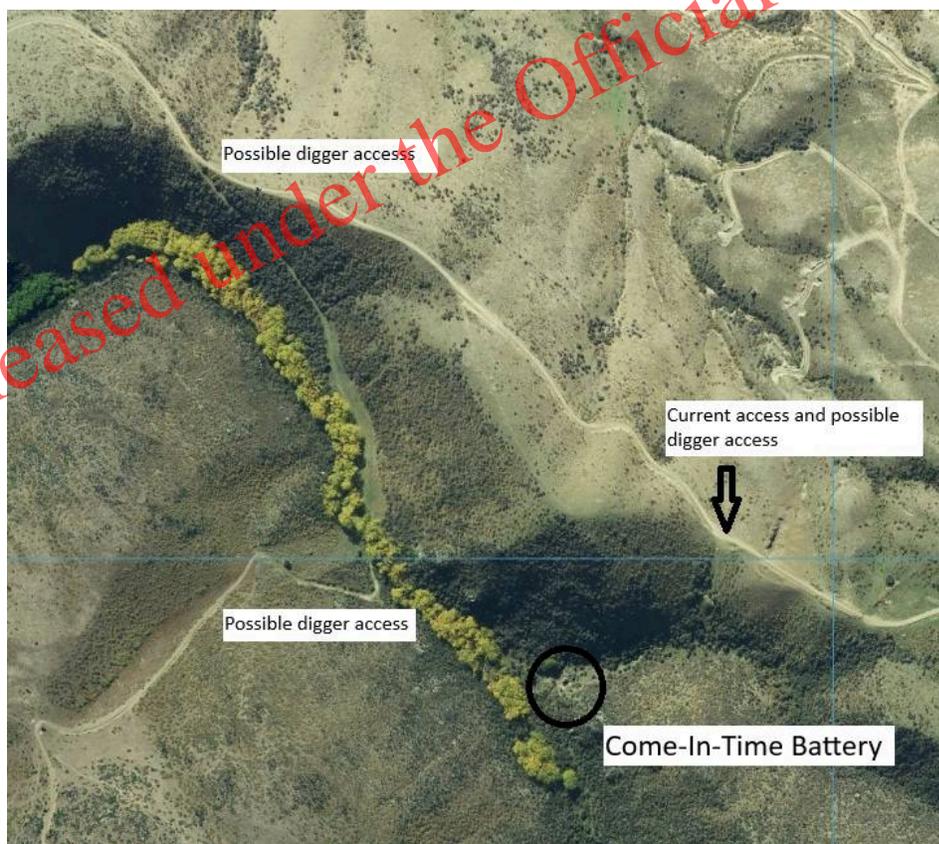
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**From:** Matt Schmidt  
**Sent:** Tuesday, 16 September 2025 10:23 am  
**To:** John Roberts; Meg Embleton-Muir; Charlie Sklenar; Marie Burton; Sally Clarkson  
**Cc:** Tracey Grose  
**Subject:** RE: Media Statement: Santana Minerals and Shepherds Creek Road Access

One puzzle here regarding Come-in-Time access. When I was discussing the restoration of the stamper battery on site with OGHT I think in 2024, modification of the current access or a new access tagged onto existing tracks into the creek was discussed to get a large digger into the site to lift the rocks for the rock walling repair and then to tidy up access (see pick below).

A large new track was certainly not on the cards, quite the contrary as there are heritage features hidden all through the area. Do you think they have the wrong end of the stick here? I made it clear that improving or making a new access would need some tight planning with Ops which their archaeologist s9(2)(a) also emphasised.

We need to talk to OGHT as soon as possible. It's not like them to do media like this even if a big company is sponsoring them for various events. I now sure they have the full picture.



-----  
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Dr Matthew Schmidt  
Senior Heritage Advisor | Kaitohu Matua Taonga Tuku Iho  
**Department of Conservation | Te Papa Atawhai**  
Ōtepoti | Dunedin Office, Level 1, John Wickliffe House, 265 Princes Street, Dunedin  
Ph. s9(2)(a) | Email [mschmidt@doc.govt.nz](mailto:mschmidt@doc.govt.nz) | doc.govt.nz

Our vision is for New Zealand to be the greatest living space on Earth | Kāore he wāhi i tua atu i a Aotearoa, hei wahi noho i te ao



International Correspondent for the Asia-Pacific Cultural Centre for UNESCO

**From:** John Roberts <jroberts@doc.govt.nz>  
**Sent:** Tuesday, 16 September 2025 10:00 am  
**To:** Meg Embleton-Muir <memuir@doc.govt.nz>; Matt Schmidt <mschmidt@doc.govt.nz>; Charlie Sklenar <csklenar@doc.govt.nz>; Marie Burton <mpayne@doc.govt.nz>; Sally Clarkson <sclarkson@doc.govt.nz>  
**Cc:** Tracey Grose <tgrose@doc.govt.nz>  
**Subject:** Media Statement: Santana Minerals and Shepherds Creek Road Access

Thanks Tracey – this is most helpful information

Meg/Matt – for your consideration wrt our feedback to Santana about their concession proposals for:

- (i) a concession to re-route the access to the CIT Battery

I'm surprised that the OGHT are 'encouraged' by this longer form access – but maybe they don't have the detail yet or have an alternative for their own purposes with Santana? Tracey – I understand the OGHT do a lot of work on the CIT Battery so can't imagine a 3km access track through the Bendigo HR would be great for them vs. the current version?

- (ii) closing the Thomsons Gorge (Shepherds Ck) road and re-routing to the north

The OGHT naturally express the importance of access to the values along the existing road in the valley along the existing route – so a real question about how to maintain that when that access doesn't seem to have a fit with the mining operations. The OGHT may not have visibility of Santana's proposal to re-route to the north, or maybe Santana doesn't actually want to close off access along the valley altogether?

Charlie – somewhere in this mix I think our feedback needs to be informed by the 'stakeholders' eg the OGHT as a voice of the public we are tasked to represent – so the obvious thing here is to have a chat with them, although am mindful of not jumping too far ahead at this time also.

If we do want to inform our feedback to Santana by having a chat with the OGHT then although it sounds like the OGHT might have at least some visibility of the same info we do, we would just need to check in with s9(2)(a) to confirm if it's OK to discuss their CIT and new road proposal with OGHT. A three way seems logical – us, Santana and OGHT to talk this through and inform our feedback to Santana ahead of them lodging their FT package, if Santana are happy to do that?

Marie/Sally – just conscious of process and the bigger picture here – think you have something else in mind wrt engaging with Santana more generally?

If you think engaging on this more narrow part of things is a good idea, the first step would be for me to contact s9(2)(a) and ask her if - to inform our view on these proposals - we can meet with the OGHT to discuss the 2 x Santana proposals between the three parties. If that's a go then you (Charlie) contact the OGHT to arrange to meet? A chance also to talk to Santana separately about the highway realignment also.

This is the sort of stuff if not handled well with us create churn for us all as it's stuff we 'own' wrt the bits on pcl, more so perhaps than the issues to do with the effects of mine itself that will have others involved (eg ORC, CODC, F&B etc)

JR

---

**From:** Tracey Grose <[tgrose@doc.govt.nz](mailto:tgrose@doc.govt.nz)>  
**Sent:** Tuesday, 16 September 2025 9:22 am  
**To:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>  
**Subject:** FW: FYI - Media Statement: Santana Minerals and Shepherds Creek Road Access

Morena

Just FYI at present – with some helpful context.  
Ngā mihi Tracey



**Tracey Grose**  
**Senior Ranger – Community** | Kaitiaki Matua, Ao Hapori  
**Te Papa Atawhai** Department of Conservation  
Central Otago district office  
1 Ballantyne Road | Wanaka | Otago 9382  
s9(2)(a) | E: [tgrose@doc.govt.nz](mailto:tgrose@doc.govt.nz) | W: doc.govt.nz

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**From:** Wanaka VC <[wanakavc@doc.govt.nz](mailto:wanakavc@doc.govt.nz)>  
**Sent:** Tuesday, 16 September 2025 8:33 am  
**To:** Charlie Sklenar <[csklenar@doc.govt.nz](mailto:csklenar@doc.govt.nz)>; Tracey Grose <[tgrose@doc.govt.nz](mailto:tgrose@doc.govt.nz)>  
**Subject:** FYI - Media Statement: Santana Minerals and Shepherds Creek Road Access

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**From:** Warwick Hawker <[warwick@pisarangeestate.co.nz](mailto:warwick@pisarangeestate.co.nz)>  
**Sent:** Monday, 15 September 2025 4:52 pm  
**To:** [warwick@pisarangeestate.co.nz](mailto:warwick@pisarangeestate.co.nz)  
**Subject:** Media Statement: Santana Minerals and Shepherds Creek Road Access

You don't often get email from [warwick@pisarangeestate.co.nz](mailto:warwick@pisarangeestate.co.nz). [Learn why this is important](#)  
Good afternoon,

Attached for your information is a Media Statement issued by the Otago Goldfields Heritage Trust regarding recent media coverage relating to the proposed Santana Minerals gold mine in Otago's Dunstan Mountains and the associated Shepherds Creek access issue.

Regards,

Warwick Hawker  
President  
Otago Goldfields Heritage Trust  
Phone: s9(2)(a)  
E-mail: [warwick@pisarangeestate.co.nz](mailto:warwick@pisarangeestate.co.nz)

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## MEDIA STATEMENT

### Otago Goldfields Heritage Trust – Santana Minerals and Shepherds Creek Road Access

#### FOR IMMEDIATE RELEASE

The Otago Goldfields Heritage Trust (OGHT) wishes to clarify its position following recent media coverage regarding the proposed Santana Minerals mining project and the Shepherds Creek road access issue.

#### Clarification of OGHT Position

The OGHT notes that comments attributed to its former president Martin Anderson in recent media reports represent his personal views and do not reflect the official position of the Trust. The OGHT does not oppose the proposed mining project by Santana Minerals Ltd.

#### Our Focus: Heritage Access and Preservation

The OGHT's primary concern remains ensuring continued public access to the significant 19th-century gold mining heritage sites in the Shepherds Creek area, including the Rise and Shine, Come in Time, and Shrek deposits. These sites represent important elements of Central Otago's goldfields history that should remain accessible to the public for educational and heritage purposes.

#### Sponsorship

The OGHT has for many years been the benefactor of sponsorship from gold mining companies and individuals. We welcome this sponsorship as it supports our ability to maintain and interpret goldfield heritage sites throughout Otago. Santana Minerals is currently supporting the OGHT's hosting of the World Gold Planning Championships to be held in Cromwell in September 2026. The OGHT is also encouraged to know that Santana Minerals is planning to provide alternative, improved, public access to the Come in Time heritage site and undertake stabilisation work that is required there.

#### Collaborative Approach

The Trust believes that heritage preservation and responsible resource development can coexist when approached collaboratively. We remain open to working constructively with all stakeholders—including Santana Minerals, the Central Otago District Council, and the Outdoor Access Commission—to find solutions that:

- Maintain public access to heritage sites
- Respect legitimate property rights
- Support appropriate heritage interpretation and protection

- Follow proper legal processes

### **Way Forward**

The OGHT encourages all parties to work within existing legislative frameworks to resolve the current access issues. We support the Outdoor Access Commission's guidance that any changes to public access should include appropriate alternative arrangements that preserve access to heritage sites.

The Trust remains committed to its core mission of preserving and interpreting Otago's goldfields heritage for current and future generations.

### **Contact:**

Warwick Hawker, President, Otago Goldfields Heritage Trust

E-mail: warwick@pisarangeestate.co.nz

---

*The Otago Goldfields Heritage Trust is a charitable organization dedicated to preserving and promoting the understanding of Otago's gold mining heritage.*

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**From:** Marie Burton  
**Sent:** Friday, 12 September 2025 4:20 pm  
**To:** s9(2)(a)  
**Cc:** s9(2)(a) Jenni Fitzgerald  
**Subject:** RE: Draft concessions and conditions

Hey s9(2)(a)

Looks like 1-3pm will work on the 22<sup>nd</sup> Sept – if you could send through an invite too Warren Chinn [wchinn@doc.govt.nz](mailto:wchinn@doc.govt.nz); Rogan Colbourne [rcolbourne@doc.govt.nz](mailto:rcolbourne@doc.govt.nz); Mandy Tocher [mtocher@lizardexpertnz.co.nz](mailto:mtocher@lizardexpertnz.co.nz) Charlotte Grey [cgrey@doc.govt.nz](mailto:cgrey@doc.govt.nz)

We will have a Lizard, Avifauna and Invertebrates expert present.

Apologies as per my email earlier in the week bit of a rush to get concessions feedback with you today but will be aiming for early next week. We are just finalising some work on the departments Section 78 conditions (FTAA) and I am trying to align that, so I can provide you with that condition set at the same time (this will be relevant to consider in relation to these approvals).

Happy to discuss on Monday if helpful.

Kind regards,

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

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**From:** s9(2)(a) <s9(2)(a)@santanaminerals.com>  
**Sent:** Wednesday, 10 September 2025 2:34 pm  
**To:** Marie Burton <mpayne@doc.govt.nz>; Jenni Fitzgerald <jefitzgerald@doc.govt.nz>  
**Cc:** s9(2)(a) <s9(2)(a)@santanaminerals.com>  
**Subject:** Re: Draft concessions and conditions

Hey Marie,

Will be wildlife 😊

Yes, we can cover heritage/recreation in the covenant session.

---

**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Sent:** Wednesday, September 10, 2025 2:26 PM  
**To:** s9(2)(a) <[REDACTED]@santanaminerals.com>; Jenni Fitzgerald <[jefitzgerald@doc.govt.nz](mailto:jefitzgerald@doc.govt.nz)>  
**Cc:** s9(2)(a) <[REDACTED]@santanaminerals.com>  
**Subject:** RE: Draft concessions and conditions

**Caution:** This Email is from an EXTERNAL source. Please exercise caution. DO NOT open attachments or click on links from unknown senders or unexpected email.

Thanks [REDACTED]

In terms of ecology is there any specific focus e.g. Wildlife/wetlands or is it intended to be all encompassing?

I am assuming heritage/recreation can be included in the covenant session?

Kind regards,

Marie

**Marie Payne**  
Senior Advisor Fast Track Applications  
Te Whanganui-a-Tara | Wellington  
Mobile: [REDACTED]



Department of Conservation  
*Te Papa Atawhai*

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**From:** [REDACTED] <[REDACTED]@santanaminerals.com>  
**Sent:** Wednesday, 10 September 2025 10:37 am  
**To:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>; Jenni Fitzgerald <[jefitzgerald@doc.govt.nz](mailto:jefitzgerald@doc.govt.nz)>  
**Cc:** [REDACTED] <[REDACTED]@santanaminerals.com>  
**Subject:** Re: Draft concessions and conditions

Hi Marie,

Further to my email below, I have some options for a second date also for the week of 22nd September- this one will be with our ecologists.

**Please note**, if your team would prefer to do both meetings that week (of 22<sup>nd</sup> September)- we can make that work also.

Monday 22<sup>nd</sup> September- anytime between 11am and 4pm  
Tuesday 23 September - midday- onwards  
Wednesday 24 September- anytime between 10am and 3pm  
Thursday 25 September - any time after 10am  
Friday 26 September any time after 10am

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**From:** [REDACTED] <[REDACTED]@santanaminerals.com>  
**Sent:** Tuesday, September 9, 2025 4:48 PM  
**To:** Marie Payne <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>; Jenni Fitzgerald <[jefitzgerald@doc.govt.nz](mailto:jefitzgerald@doc.govt.nz)>  
**Cc:** [REDACTED] <[REDACTED]@santanaminerals.com>  
**Subject:** Re: Draft concessions and conditions

Hey Marie,

I have heard back from our planner, so can provide some options for next week for one part of it (compensation/offsetting/concessions- planning type stuff) and then will wait to hear back from our ecologists regarding biodiversity side of it.

Monday 15<sup>th</sup> after 2.30pm  
Tuesday 16<sup>th</sup> after 2pm  
Friday 19<sup>th</sup> 10am- 1pm or after 3.30pm

Kind regards,

[REDACTED]

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**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>  
**Sent:** Tuesday, September 9, 2025 1:24 PM  
**To:** [REDACTED] <[REDACTED]@santanaminerals.com>; Jenni Fitzgerald <[jefitzgerald@doc.govt.nz](mailto:jefitzgerald@doc.govt.nz)>  
**Subject:** RE: Draft concessions and conditions

**Caution:** This Email is from an EXTERNAL source. Please exercise caution. DO NOT open attachments or click on links from unknown senders or unexpected email.

Sounds good [REDACTED], the more notice for our team the better so the following week is ideal.

Kind regards,

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile: s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

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**From:** s9(2)(a) <[redacted]@santanaminerals.com>

**Sent:** Tuesday, 9 September 2025 1:05 pm

**To:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>; Jenni Fitzgerald <[jefitzgerald@doc.govt.nz](mailto:jefitzgerald@doc.govt.nz)>

**Subject:** Re: Draft concessions and conditions

Thanks Marie, just waiting to hear back from our planner and ecologists- as to possible dates. We have a two-day workshop next week, so that is going to limit our availability unfortunately, but will do our best to fit it in- otherwise may be the following week.

Kind regards,

s9(2)(a)

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**From:** Marie Burton <[mpayne@doc.govt.nz](mailto:mpayne@doc.govt.nz)>

**Sent:** Monday, September 8, 2025 4:50 PM

**To:** s9(2)(a) <[redacted]@santanaminerals.com>; Jenni Fitzgerald <[jefitzgerald@doc.govt.nz](mailto:jefitzgerald@doc.govt.nz)>

**Cc:** John Roberts <[jroberts@doc.govt.nz](mailto:jroberts@doc.govt.nz)>; Charlie Sklenar <[csklenar@doc.govt.nz](mailto:csklenar@doc.govt.nz)>; s9(2)(a)

s9(2)(a) @santanaminerals.com>; s9(2)(a) @santanaminerals.com>

**Subject:** RE: Draft concessions and conditions

**Caution:** This Email is from an EXTERNAL source. Please exercise caution. DO NOT open attachments or click on links from unknown senders or unexpected email.

Hey s9(2)(a)

Thanks for your emails.

### Concessions email

- We have a team looking at the concession information and we will get back to you with some feedback – aiming for Friday but this could take longer, I will let you know how we are tracking later in the week.
- DOC also has mandatory/standard conditions to manage risk/crown liability in relation to FT applications; these are the conditions which DOC recommend or direct a panel to apply. I am working with our permissions advisor to identify conditions of relevance here and will include in our feedback.

### Presentation/workshops

- if you could propose some dates for next week this would be good. I will ask our experts to accommodate as a priority (I think splitting into biodiversity/concessions & covenant (as they both fall under Schedule 6) would be good and perhaps a general meeting where we could discuss other issues e.g. compensation/offsetting approach?
- We are in the process of summarising feedback on
  - Heritage
  - Lizards
  - Fauna/ecology
  - And concessions but now reviewing in relation to the above

And will get this through to you before the meetings.

Any questions please call or let me know.

Kind regards,

**Marie Payne**

Senior Advisor Fast Track Applications

Te Whanganui-a-Tara | Wellington

Mobile s9(2)(a)



Department of Conservation  
*Te Papa Atawhai*

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**From:** s9(2)(a)@santanaminerals.com>

**Sent:** Monday, 8 September 2025 11:03 am

**To:** Marie Burton <mpayne@doc.govt.nz>; Jenni Fitzgerald <jefitzgerald@doc.govt.nz>

**Cc:** John Roberts <jroberts@doc.govt.nz>; Charlie Sklenar <csklenar@doc.govt.nz>; s9(2)(a)

s9(2)(a)@santanaminerals.com>; s9(2)(a)@santanaminerals.com>

**Subject:** URAT concessions and conditions

Hi Marie, Jenni,

As promised, please see attached our various draft DOC concessions and conditions relating to our fast track application. Our planners have left a gap for DOC's standard terms and conditions.

If possible, can you please provide any review comments back to us by COB Friday 12<sup>th</sup> September.

Many thanks,

s9(2)(a)

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**Template for DOC SME project feedback – FT projects**

This is a template to facilitate our DOC Project team SME’s providing their expert feedback on reports, assessments and draft application documents provided by applicants. Guidance notes are in yellow and should be deleted once the template is populated, this document sets out a structure for providing feedback but please amend and add areas if required to capture the information you feel is relevant.

Please save a copy of this template (naming with your expertise area) into the relevant area of feedback in the project folder.

<b>Date</b>	
<b>FT Project</b>	
<b>Advisor</b>	

**Subject matter area:** e.g. BHV – Heritage

**Summary statement:** Key findings and critical issues/opportunities identified through reviewing the information provided and any caveats to the advice provided.

**Documents reviewed:**

<b>Name</b>	<b>Link</b>
<b>Heritage assessment – example</b>	<a href="#">Heritage Assessment.pdf</a>
<b>Draft Wildlife application document</b>	XXXXX

**SME Feedback Areas:** Please provide in accordance with the headings below

**Scope**

- Will/Does the scope of the information provided adequately inform the application? (e.g. if its an assessment does it cover the relevant conservation considerations (e.g have appropriate surveys/studies informed the work, any critical/key gaps).

**Values assessment**

- values assessment (see Section 3 below for further guidance) this is an area of work which is developing and is key in understanding how we will quantify DOC’s view on appropriate mitigations and offsetting/compensation
- Section 3 is a set of tools so that we can provide feedback consistently with developing evaluation tools – it is intended only as guidance and if you have concerns please contact FT project lead for further advice.

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- Initially we are looking for a high-level values assessment – the detail in the tools below may go beyond that so please use with discretion.

### **Effects analysis**

- based on the information provided what is DOC position on how effects have been determined, is it adequate are their key/critical gaps/opportunities – these would likely be broken down into relevant areas/topics for consideration, does DOC have a different view on the effects

### **Effects management**

- at a high level what scale types of avoidance, mitigation, compensation or offsetting should be considered to manage these effects
- Working on specifically what we would anticipate as a specific mitigation/offsetting/compensation provision will come later but please include ideas to reflect on

### **Reflecting on the provisions of the Fast-track approvals act**

- The different schedules in the FTAA relate to the information requirements (information the applicant has to provide in their application), what DOCs reports need to provide comment on (but they are not limited to this – noting commentary outside of this may be weighted differently) should reflect a panels decision making criteria.
- See Section 2 below for specific schedules of the Fast-track approvals act in relation to approvals (e.g. Wildlife, concessions, freshwater fisheries). FT project team lead can provide more direction and context in relation to these schedules and more generally the FTAA.
- Our commentary should reflect these aspects e.g. is the information the applicant has provided adequate to meet/inform these information requirements, enable DOC to write reports and subsequently inform a panels decision. If not what are the gaps/issues?
- If you are reviewing an assessment rather than a draft application this our commentary in this space is likely limited but we might be able to identify key considerations e.g. that haven't been covered by an assessment and therefore we would anticipate could mean information requirements aren't meet (however the applicant may have more information which they haven't shared with DOC to date (it may exist).

**Section 2:** Relevant schedules of the FTAA

Schedule 6 - Approvals relating to Conservation Act 1987, Reserves Act 1977, Wildlife Act 1953, and National Parks Act 1980

Schedule 7 - Approvals relating to Wildlife Act 1953

Schedule 9 - Approvals relating to complex freshwater fisheries activities

Schedule 11- Approvals relating to Crown Minerals Act 1991

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### Section 3: Tools to inform conservation values assessment

#### Biodiversity values assessment tools

As previously noted work in this area to provide consistent criteria for assessing values is on going – the tables and links below are tools to assist project team SME’s in doing this – but are not definitive. If you have further questions about how to reflect on values in your assessment please contact your project team lead for further advice. There is a separate table for Freshwater considerations below.

**Table 1: Indigenous terrestrial vegetation, ecosystems and habitats of indigenous fauna, including wetlands where they form a mosaic with terrestrial ecosystems**

Criterion	Definition	Key assessment principles	Assessment Attributes	DOC commentary in relation to proposal
Representativeness	The extent to which indigenous biodiversity is typical or characteristic of the natural diversity of the relevant Ecological District	<ul style="list-style-type: none"> <li>includes seral (regenerating) indigenous vegetation that is recovering following natural or induced disturbance, provided species composition is typical of that type of indigenous vegetation</li> <li>Fauna habitat should be considered in terms of how well it supports the typical suite of indigenous animals that would occur in the present-day environment. Habitat of indigenous fauna may be indigenous or exotic</li> </ul>	<ol style="list-style-type: none"> <li>The degree to which indigenous vegetation has ecological integrity that is typical of the character of the ecological district</li> <li>The degree to which habitat that supports a typical suite of indigenous fauna is characteristic of the habitat type in the ecological district and the species expected for that habitat type in the ecological district</li> </ol>	

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- |  |   |  |  |
|--|---|--|--|
|  | <ul style="list-style-type: none"><li>• May include commonplace indigenous vegetation and the habitats of indigenous fauna, which is where most indigenous biodiversity is present. It may also include degraded indigenous vegetation, ecosystems and habitats that are typical of what remains in depleted ecological districts. It is not restricted to the best or most representative examples, and it is not a measure of how well that indigenous vegetation or habitat is protected elsewhere in the ecological district</li><li>• When considering the typical character of an ecological district, any highly developed land or built-up areas should be excluded</li><li>• Needs to consider indigenous vegetation and habitats that are representative of the full range and extent of ecological diversity across all environmental gradients in an ecological district, such as</li></ul> |  |  |
|--|---|--|--|

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		climate, altitude, landform, and soil sequences. The ecological character and pattern of the indigenous vegetation in the ecological district should be described by reference to the types of indigenous vegetation and the landforms on which it occurs		
Diversity & Pattern	The extent to which the expected range of diversity and pattern of biological and physical components within the relevant ecological district is present	<ul style="list-style-type: none"> <li>Diversity of biological components is expressed in the variation of species, communities, and ecosystems. Biological diversity is associated with variation in physical components, such as geology, soils/substrate, aspect/exposure, altitude/depth, temperature, and salinity.</li> <li>Pattern includes changes along environmental and landform gradients, such as ecotones and sequences.</li> <li>Natural areas that have a wider range of species, habitats or communities or wider environmental variation due to ecotones, gradients, and sequences in the context of the</li> </ul>	<ol style="list-style-type: none"> <li>The degree of diversity of indigenous species, vegetation, habitats of indigenous fauna or communities in the context of the ecological district</li> <li>The quality of indigenous ecotones, complete or partial gradients or sequences.</li> </ol>	2.

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		ecological district, rate more highly under this criterion.		
Rarity & Distinctiveness	The presence of rare or distinctive indigenous taxa, habitats of indigenous fauna, indigenous vegetation or ecosystems	<ul style="list-style-type: none"> <li>Rarity is the scarcity (natural or induced) of indigenous elements: species, habitats, vegetation, or ecosystems. Rarity includes elements that are uncommon or threatened.</li> <li>The list of Threatened and At Risk species is regularly updated by the Department of Conservation. Rarity at a regional or ecological district scale is defined by regional or district lists or determined by expert ecological advice. The significance of nationally listed Threatened and At Risk species should not be downgraded just because they are common within a region or ecological district.</li> <li>Depletion of indigenous vegetation or ecosystems is assessed using ecological districts and land environments.</li> <li>Distinctiveness includes distribution limits, type localities, local endemism, relict</li> </ul>	The degree to which: <ol style="list-style-type: none"> <li>an area provides for habitat of an indigenous species that is listed as Threatened or At Risk (declining) in the New Zealand Threat Classification System lists</li> <li>an indigenous vegetation type or an indigenous species occurs that is uncommon within the region or ecological district</li> <li>an indigenous species or plant community at or near its natural distributional limit occurs</li> <li>indigenous vegetation is present that has been reduced to less than 20 per cent of its pre-human extent in the ecological district, region, or land environment</li> <li>indigenous vegetation or habitat of indigenous fauna occurs in naturally uncommon ecosystems</li> <li>the type locality of an indigenous species occurs</li> </ol>	

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		distributions, and special ecological or scientific features.	7. a distinctive assemblage or community of indigenous species occurs 8. a special ecological or scientific feature occurs	
Ecological Context	The extent to which the size, shape, and configuration of an area within the wider surrounding landscape contributes to its ability to maintain indigenous biodiversity or affects the ability of the surrounding landscape to maintain its indigenous biodiversity	<ul style="list-style-type: none"> <li>Includes the characteristics that help maintain indigenous biodiversity (such as size, shape, and configuration) in the area</li> <li>Includes the contribution the area makes to protecting indigenous biodiversity in the wider landscape (such as by linking, connecting to or buffering other natural areas, providing 'stepping stones' of habitat or maintaining ecological integrity)</li> </ul>	The degree to which an area: <ol style="list-style-type: none"> <li>has a robust size and a compact shape</li> <li>is well-buffered</li> <li>provides an important full or partial buffer to, or link between, one or more important habitats of indigenous fauna or significant natural areas</li> <li>is important for the natural functioning of an ecosystem relative to remaining habitats in the ecological district.</li> </ol>	

**Freshwater assessment**

- Locate site in ArcReader. Note a site (assessment unit) may be one or several polygons.

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- b. Go through assessment steps below
- c. Make brief text comment on each of 4 ecological significance criteria, where relevant (see table below).
- d. Make overall assessment of significance (High, Medium, Low) \*. Apply the highest significance from the evaluation of each criterion. *Do not reduce significance assessment made by Terrestrial experts (but can increase)*
- e. If necessary, make comment on the quality of information

\*Note: Low rank if no FW systems or values present or predicted, and small parcel size.

Ecological significance criteria	Data/Resources to assess	ArcReader layers to open	What to look for	DOC commentary
Representativeness	1. Check for wetland, lake, river or estuary presence	<ul style="list-style-type: none"> <li>• Aerial imagery</li> <li>• Topo50_Sl</li> <li>• REC1 -&gt; RC_Classification</li> <li>• FENZv1 wetlands current typology</li> <li>• Estuaries -&gt; NZ coastal hydrosystems classification</li> </ul>	Are any freshwater systems present that need to be evaluated, and if so, what type?	

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	2. Check for wetland, lake, river or estuary significance in Ecological District	<ul style="list-style-type: none"> <li>• Management -&gt;</li> <li>Boundaries -&gt;</li> <li>Ecological districts</li> </ul>	Are the FW systems a good example of 'natural state' environment for that region? Are there many others like it in that region? Natural wetlands are rare (nationally) so if they are present they are significant.	
	3. Check for wetland, lake or river naturalness	<ul style="list-style-type: none"> <li>• Aerial imagery</li> <li>• Species -&gt;</li> <li>Macroinvertebrates</li> <li>-&gt; Predicted Invertebrate MCI -&gt;</li> <li>Contemporary Invertebrate MCI</li> </ul>	Are the FW systems in their natural state or are they modified based on aerial photography? Are the FW systems in their natural state based on predicted MCI score = higher MCI = high naturalness for streams.	
Diversity and Pattern	4. Check for ecosystem/habitat diversity and pattern	<ul style="list-style-type: none"> <li>• Aerial imagery</li> </ul>	Do the FW ecosystems in the land parcel support a range of habitat types?	
	5. Check for species diversity	<ul style="list-style-type: none"> <li>• Fish -&gt; NZFFD</li> <li>• Fish -&gt; spawning sites</li> <li>• Threatened invertebrates</li> </ul>	Would you expect the FW ecosystem to support relatively good species diversity?  If no species records in the parcel, look in similar habitats nearby, and upstream and	

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		<ul style="list-style-type: none"> <li>Species -&gt; Water birds</li> </ul>	downstream in the catchment and similar catchments for migratory species. Supply species list here (diversity)	
Rarity and distinctiveness	6. Check for threatened freshwater/land environments and rare ecosystems	<ul style="list-style-type: none"> <li>Terrestrial -&gt; LENZ Threatened environments classification</li> <li><a href="#">Naturally Uncommon Ecosystems</a></li> </ul>	<p>Are the FW ecosystems situated in a region of highly threatened habitat?</p> <p>Are any of the FW ecosystems a Naturally Rare/Uncommon ecosystem type in NZ?</p>	
	7. Check for actual or predicted threatened species presence	<ul style="list-style-type: none"> <li>NZFFD</li> <li>Threatened invertebrates</li> </ul>	Threatened species present = high ranking. High proportion of known distribution of at risk species in parcel or several at risk species present = high ranking.	
Ecological context (size, shape, connectivity, buffering)	8. Evaluate ecological context	<ul style="list-style-type: none"> <li>Aerial imagery</li> <li>Other public conservation land</li> <li>Nga Awa -&gt; DOC Nga Awa sites</li> </ul>	Look at the catchment and management context. Does the area provide an important ecological buffer, or connectivity, that supports the ecological health of adjacent or downstream FW ecosystems?	

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		<ul style="list-style-type: none"> <li>• EMUs</li> <li>• Wetland, River, Lake Estuary mapping</li> <li>• Community restoration</li> <li>• Nga Whenua (Māori covenant/protected areas)</li> </ul>	E.g. If within a Nga Awa catchment, supports connectivity for fish passage, or has important role in buffering downstream wetlands, lakes or estuary = high ranking.	
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#### Other sources

- A framework for guiding appropriate compensation or offsets for impacts of mining on conservation values - [DOCDM-1092234](#)
- [Guidance on Good Practice Biodiversity Offsetting in New Zealand - August 2014](#)
- [Attachment 1 - DOC Biodiversity Assessment Criteria.docx](#)
- Significance measures for ecosystems:
  - [The Threatened Environment Classification for New Zealand 2012: a guide for users](#)
  - [Department of Conservation guidelines for assessing significant ecological values](#)

#### Cultural and heritage assessment

Historic - [Assessing the archaeological values of historic places: procedures, methods and field techniques](#) – p12

- Benefits measures for assets - Note that s76 of the Crown Minerals Act allows for compensation to include "a sum by way of solatium for loss of privacy and amenities". This provision is a further justification for assessing compensation for loss of human benefits.

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## A further tool

Assessment of cultural and heritage values will depend on the sites in question and what (if any) knowledge may be held about that area/site and reflecting on the assessment provided.

Conservation of a place should be based on an understanding and appreciation of all aspects of its cultural heritage value, both tangible and intangible. All available forms of knowledge and evidence provide the means of understanding a place and its cultural heritage value and cultural heritage significance. Cultural heritage values include any scientific or educational value ascribed to a site.

Cultural and heritage values should be understood through consultation with connected people, systematic documentary and oral research, physical investigation and recording of the place, and other relevant methods. All relevant cultural heritage values should be recognised, respected, and, where appropriate, revealed, including values which differ, conflict, or compete.

Places of cultural heritage value would in general, have:

- (i) have lasting values and can be appreciated in their own right;
  - (ii) inform us about the past and the cultures of those who came before us;
  - (iii) provide tangible evidence of the continuity between past, present, and future;
  - (iv) underpin and reinforce community identity and relationships to ancestors and the land;
- and
- (v) provide a measure against which the achievements of the present can be compared.

For sites having a particular heritage or cultural scientific or educational value, a description of the value and its significance is required (e.g. geological/ landform).

For more info: [ICOMOS NZ Charter](#)

For geological importance, the Geopreservation Inventory should be looked at - [MAIN Trust Maps](#)

**Recreational assessment** - working progress and may consider RMA definition of Amentity

- Site of low biological or/and cultural, or/and landscape or/and geological values
- Low level of alignment with strategic objectives/visitor network strategy
- Low level of social license for retaining/acquiring and high level of social license for exchanging/not acquiring
- Site is highly modified with low ecological and/or heritage values
- The location has low use including by local community
- Non-legal access or informal access
- Landscape?

Considerations	DOC Commentary on PCL
Alignment with strategic objectives/visitor network strategy	
Social license – for PCL, social license for exchanging away the land, and for the land offered, social license for acquiring the land	
Rarity of experience within the region	
Use level (for PCL)/anticipated use level (for land offered)	
Level of access (eg tracks)	
Natural hazard/climate risk	

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How do any heritage or biodiversity values affect the visitor experience (for land offered, how might heritage or biodiversity values affect the visitor experience?)	
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Notes from Satana Wildlife session 22/09/2025

### Short overview of project and timeline – Wildlife

- 568 ha
- Open pit underground majority of infrastructure in Shepards valley
- 4 main pits
  
- Different stages
  - Development
  - Operation – main bulk of activity
  - Active closure

Ecological enhancement area

- Two fully fenced areas
- Targeted pest control

Management plan – each plan species a specific species

- 610ha variable quality habitat will be lost 480 ha will be rehabilitated (native dominated landscapes) livestock management and pest management.
- 130 ha which can not be rehabilitated are predominately the pits
- Trial reinstating cushion fields if cushion field habitat type
- Also using rock piles and rubble pits- 1 every 5ha
  
- Offset and compensation – positive benefits outside the footprint 2000+ HA
  
- 889 – outside the footprint – pest control
  
- Adgour Restroation area 1200ha – pretty close to impact site – pest control and weed control
  
- Two pest exclusion fences – the Bendigo area 29ha – Ardgall – 38ha – good lizard recovery in these areas supplemented with more rocky outcrops

## Invertebrates

- A new species
- Megadronus found inside the footprint – and how they will be managed
- A new species of harpolis that was inside the DDF
- Species that was thought to be extinct – found at 800m and up -not many records to demonstrate it is found in low lying areas
- Community structure – how would you encompass it? It's a mix moths large component – flightless component and patchy
- Is it a stable community – difficult to answer looking over multiple years species assembles different over the summer
- Small diversity but large numbers
  - Snails – have not identified -desktop study – will check I naturalist
  - 419 taxa – 219 species – different 40% difference
- Didn't survey earthworm samples – rehabilitation focus particularly earthworms, might wipe them out might need to find the proportion of invertebrates and seed them - question back – you can spread out the soil oxygenate it

## Plant pest management plan

- Focuses on all land outside of fenced areas/sanctuaries
- Outcomes are
- Outcomes are set out in higher level management plans and the detail is contained to specific management plans e.g. how they are going to achieve that
- Translocation of key species in to the sanctuary areas
- Monitoring and reporting where will that be codified –
  - how will it work ? Management plans will be dealing with monitoring
  - Parts of the plan have monitoring thresholds – e.g. if they are breached the controls will happen
  - Net lot through to net gain – applied offsetting
  - Biodiversity outcome monitoring plan
- Operational monitoring for pest control – what will happen if we achieve it and what will happen if we don't
- Same with the weed control

## Approach to management plans

- Conditions capture all the management plans that have been prepared and asking the plans to be certified as part of the process

- Reflected in the consent condition the objective of the plan and the key environmental outcome to be achieved
  - Yet to be developed – site specific erosion and sediment control plans
  - Ardgour rise for example management plan would be certified subsequently
- Outside of sanctuaries no mice control
  - Releasing outside the fence in a pest control area where mice can not be controlled

#### Lizards

- Surveyed over 5000ha – and the balance other side 650 person hours –
- 610ha of land where there would be direct disturbance
- Key messages
  - Only found the 3 species
- Keen to have a discussion with DOC around level of salvage for other large projects
- Expecting up to 500,000 but hard to be specific salvage within the project footprint and provide assurance within the footprint to the degree possible
- Then would end up with lots of lizards which need to be relocated – wide and far across a huge area to avoid impacts on existing lizards
- No guarantee lizards would survive – can't deal with mice at the scale they need to
- Salvaging and relocation would need to be in the warmer month and that won't impact mining project delivery
- What has been proposed is salvage 100,000 lizards – considering this mitigation
- 'Avoidance' – difficult to do in this instance i.e. primary avoidance has been on cushion field and scrublands
- 25 yrs (even with habitat improvement) would take a long time for lizards to come back – if ever
- Would just at risk species be targeted -? Question currently grappling
- Assuming net loss outcomes for lizards –
- What the approach was on taken on the near by site
- 

#### Avifauna

- Falcons and pipets – need to be careful targeting toxins at the right time the falcons may eat the mice

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- Pipets likely to be disturbed by mining – they like rough pasture land and would come back quickly
- Falcon – nesting sites in the area – making sure they are not nesting whilst going to be doing mining
  
- How progressed are management plans?
- Freshwater fisheries approvals

#### Compensation

- Not planning on using compensation model tests/professional judgement and have line itemed with judgement.
- Net loss outcome or it could go either way –
- Looked at offsetting – looked at tests for BCM and then defaulted to profession opinion
- Cushion fields – not appropriate to compensate
  - Doing everything that they can to avoid, remedy, minimise effects – don't have certainty – doing everything that can be done – well how is the gap bridged?
  - Net loss outcome – how explicit that is
- Providing for protection and perpetuity – covenant is being explored

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## **Section 3 – BOGP Working Draft Substantive Application Report – Project Description**

Notes:

- Green highlighted sections may be of particular interest
- Text in red font are things to note/be aware of

This document provides a summary of the DRAFT Project Description provided to DOC and dated 24 September 2025. The Project Description is saved here:

[Section 3 - BBOGP Working Draft Substantive Application Report - Project Description \(24 September 2025\).pdf](#)

### ***Project Description (section 3)***

- Proposed activities associated with the approvals sought
- Some technical reports refer to additional activities that are no longer part of the project. All activities and approvals sought are described in the Project Description i.e. any components described in technical reports and not in the Project Description are to be disregarded
- Activities described in Project Description are 'worst-case' scenario and cover maximum disturbance footprint (applicant has and will continue to refine and reduce the footprint during detailed design)

### ***Project Benefits (section 3.1)***

- Extensive exploration work has identified orebodies with gold deposits estimated to contain approx. 1.15 million ounces of gold
- Development of RAS, SRX, SRE and CIT orebody deposits
- Significant regional and national economic benefits due to foreign investment, exports, employment opportunities & contribution to Otago economy
- Anticipated annual gold production rate of 125,000 oz & revenue of approx. \$5.3 billion over 9.2 years
- Creation of approx. 364 jobs (peak of 485) – skilled and unskilled. Flow on benefits for jobs in local businesses across region and SI more widely (additional approx. 509 indirect jobs)
- See section 3.1 for rest of benefits

## **Project Overview (section 3.2)**

- New gold mine, ancillary facilities and environmental mitigation measures on Bendigo and Ardgour Stations in Dunstan Mts
- Majority of activities will be located in Shepherd's Valley with general and administration area located on adjoining Bendigo / Ardgour terraces
- Open pit methods at each deposit & underground mining at RAS to access deeper deposits
- Maximum disturbance footprint of 568 ha

### **Key activities:**

- Staged establishment of RAS open pit and underground mine – will remain as pit lake at closure
- Establishment of CIT open pit – backfilled with waste rock from RAS open pit and rehabilitated at completion of mining activities
- Establishment of SRE open pit – progressively rehabilitated with waste rock before becoming an engineered landform (ELF) for adjoining SRX open pit
- Establishment of engineered tailings storage facility (TSF) in upper reach of Shepherds Valley (SV) (including clean & dirty water diversions and seepage collection sump) which will utilise overburden waste rock from development of RAS open pit to form heavily protected buttress for SV ELF
- Establishment of 3 ELFs to permanently store overburden waste rock – SV ELF, SRX ELF & Western ELF
- Conventional hard-rock gold processing plant in lower reach of SV, associated processing infrastructure & ancillary activities including establishment of all-purpose Shepherds Service Corridor & realignment of Shepherds Creek to form the Shepherds clean water diversion channel (CWDC)
- Establishment of mine offices, laboratory, ablution blocks, car parks, workshops and equipment servicing infrastructure at Ardgour terrace site
- Establishment of temporary topsoil, vegetation and brown rock stockpiles & storage areas around project site
- Comprehensive earthworks for exploration purposes within SRX gold deposit
- Taking of groundwater from Bendigo Aquifer via lawfully established bores & proposed new bore. Water to be conveyed to processing plant via a pipeline over approx. 6.5 km
- Establishment of Shepherds Silt Pond at base of Shepherds ELF and water storage tank(s) for use at processing plant, dust suppression and drinking water supply
- Establishment of supporting infrastructure / activities within project site, such as
  - upgrade of Ardgour Rd & Thomson Gorge Rd to provide improved access to BOGP
  - internal mine access and haul roads
  - water pipelines & underground utilities

- electricity supply from Lindis Crossing & Matilda Rise
- Proposed temporary closure of parts of Thomson Gorge Rd (TGR), enhancement of TGR east of the project & permanent closure of paper road in lower SV whilst mining operations & rehabilitation services are undertaken
- Fenced & secure explosives and detonators, magazines and explosive emulsion mixing facilities (located outside mining operations area on Bendigo / Ardgour Terraces)
- Establishment of non-operational infrastructure on Bendigo / Ardgour Terraces including
  - temporary construction workers accommodation (partly in form of caravan park)
  - general security buildings
  - first aid and admin offices
  - geology complex – including core and sample storage area, offices and laboratory
  - waste management areas
  - contractor laydown yards
  - substation
- Establishment of 2 aggregate pits on existing agricultural land on Bendigo / Ardgour terraces
- No proposed mining activities on PCL however the following activities will be undertaken to maintain and / or improve public access and amenity:
  - Establishment of Ardgour Rise across Ardgour Station to provide public access through to Manuherikia Valley
  - Replacement walking route to CIT battery
  - Upgrades to intersection of SH8 & Ardgour Rd
  - Crack willow management within Bendigo and Clearwater Creeks
  - All necessary activities that are ancillary to those above
- Damming, diverting and reclamation of watercourses and the establishment of various clean and dirty water diversion channels around mine components
- Any additional ecological measures e.g. salvaging TBC
- Undertaking of mine remediation and closure activities

Note: a more detailed description of each of these components is provided in following sections

## **Site Rationale and Functional Needs (section 3.3)**

### **High level summary:**

- Mining can only occur where gold resource is located
- Gold deposits located within the Otago schist and associated with the mineralised Rise and Shine Shear Zone (RSSZ) which juxtapose lower greenschist facies TZ3 and mid to upper greenschist facies TZ4 schists. This geology dictates location of mine
- Further assessment in relation to functional need to located aspects of the project in locations that result in loss of river and wetland extent and values, or affect biodiversity, are provided in another section of report – we don't have access to this
- Easily accessible from nearby towns – no need for fly-in-fly-out and permanent camps
- Temporary construction workers camp for up to 80 people will need to be established for up to 2 years during construction – may include temporary caravan park (up to 20 caravans). Located alongside admin offices & other non-operational components on the Ardgour Terrace
- Water will be supplied from combination of consented and proposed new bores at Bendigo Aquifer approx. 6 km west of project site
- Site is close to Clyde Dam Hydro Power Scheme – supply of power to the mine will bring forward major upgrade by Aurora Power that will increase power supply and reliability to Central Otago

## **Early Works (section 3.4)**

### **High level summary:**

- Resource consent application to CODC alongside FT application
- Early works application seeks to enable early construction of support facilities including
  - temporary construction workers accommodation
  - geology compound & admin buildings within Ardgour Terrace Site – including truck stop, induction building and office; medical facility, carparking areas & construction laydown areas
  - earthworks associated with realignment of section of TGR to facilitate access to Ardgour Terrace Site

These activities covered by the early works consent application are also sought to be authorised through FT substantive application. As required by s94 FTAA if the early works consent has not been granted by the time the substantive application is lodged, it will be withdrawn

### **Open Pit Mining (section 3.5)**

- Will occur at RAS, CIT, SRX and SRE gold deposits. Open pit lifespan expected to be approx. 8 years
- Open pit blasting will occur only during day shift & will initially deliver ore to the processing plant at expected rate of up to 1.2 million tonnes per year – but able to be expanded up to 1.8 million tonnes per year

#### **Rise and Shine Open Pit (section 3.5.1)**

- Mined by both open pit & underground methods. Both methods will be independent & can be developed in parallel
- RAS open pit disturbance area approx. 64.3 ha
- Final pit design approx. 200 m deep at the highwall, 1000 m long and 800 m wide
- Crest elevation of open pit approx. 700 m mRL; base of pit elevation approx. 395 mRL



Figure 3-2: Illustration of the Rise and Shine Open Pit

- Tables 3-1 & 3-2 indicative inventories – pit will be mined in 5 stages
- Figures 3-3 & 3.4 material movements per year

#### **SRX Open Pit (section 3.5.3)**

- Shallow open pit with disturbance area of approx. 15 ha
- Final pit design approx. 88 m deep, 650 m long and 250 m wide. Pit will be dewatered during mining
- Pit will be open approx. 12-15 months as RAS open pit is nearing completion
- Once mining is complete, SRX pit will be rehabilitated to a pit lake, which will overflow to Rise and Shine Creek at its NW extent

- Pit lake will form over time. Vegetation cover will be established where benches intersect natural land surface to soften intersection between natural landform and pit walls



- Figure 3-5: Indicative SRX Open Pit and SRX Engineered Landform Design
- Table 3-3 indicative inventory
- Figure 3-6 total material mined per month
- Surface water from Rise and Shine Valley (i.e SRX and SRE open pits) will discharge into the Rise and Shine Creek which then flows into Clearwater Creek and then Bendigo Creek
- RAS open pit will intercept the Rise and Shine Creek and an engineered diversion channel will be constructed to maintain baseflow of the creek & minimise water entering RAS open pit during flood conditions
- Diversion channel will be open channel which will require wider pit bench but will convey greater flows around the pit.

Note: EGL (2025e) presented 2 options for diversion channel around RAS pit – Matakanui going with wide, open channel as part of substantive application

(cannot locate a report by EGL...)

### **Srex East Open Pit (section 3.5.3)**

- Small open pit located in footprint of SRX ELF
- Disturbance area of approx. 1 ha, 100 m long and 100 m wide
- After being mined, pit will be backfilled with overburden from adjoining SRX open pit and then covered by SRX ELF

### **Come-In-Time Open Pit (section 3.5.4)**

- Shallow pit with disturbance area approx. 13.8 ha
- Final pit design approx. 300 m long and 535 m wide

- Pit will be dewatered during mining and have duration of 12-15 months
- Mining of CIT pit scheduled to occur towards end of mine life (at year 5 or later) if the “threatened spring annuals vegetation” found on and in the vicinity of the pit footprint have been found in sufficient numbers elsewhere or have been successfully propagated
- Further details on spring annuals in Applied Research Plan (ARP)  
[Applied Research Plan - herbfields.pdf](#)
- Following completion of mining, pit will be backfilled with overburden directly from RAS open pit or one of the ELF's
- Rehabilitation of final profile of backfilled pit will be directed by ARP which seeks to deliver rehab outcomes that include threatened spring annuals



Figure 3-7: Indicative Come in Time Open Pit Design

### **Open Pit Mining Fleet (section 3.5.5)**

- Drilling operations divided into 2 distinct zones – ore and bulk waste zones
- Details on pit mining fleet

### **Rise and Shine Underground Mining (section 3.6)**

- Underground mine targets continuation of orebody down plunge (generally N, NW) beneath open pit
- Underground portals located in SV – upstream of main processing plant & downstream of pit, Shepherd's ELF and TSF
- Workshops & associated offices located on purpose-built platform within western extent of Shepherds ELF footprint
- Blasting will occur as required on 24-hour basis. Unlikely to be heard or felt outside project site
- Life of mine expected to be 6 years

- Proposed to commence in month 19 of overall processing, 3 years after RAS open pit commences
- Initial ore will be stockpiled & timed to commence feed to processing plant as processing rate expands to 1.8 mill tonnes per year

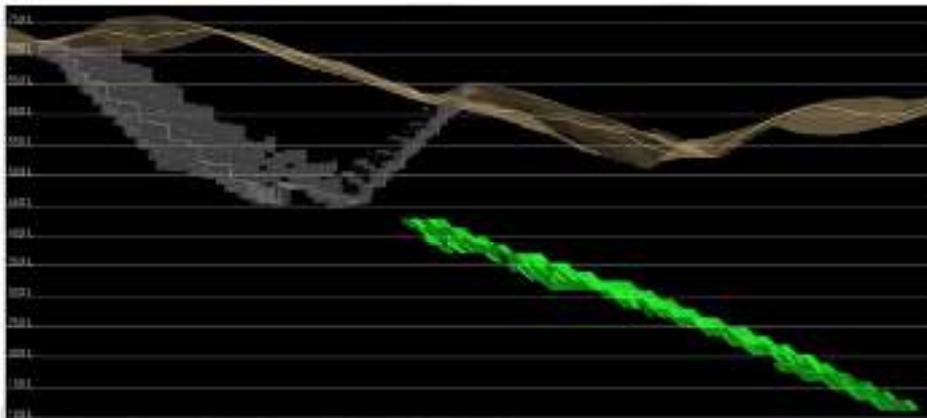


Figure 3-8: Section View of Proposed Stopping Layout for Rise and Shine Underground

Open pit (grey) and underground mine (green)

- Further details on underground mining process including those relating to
  - Access (3.6.2)
  - Ventilation (3.6.3)
  - Mining fleet (3.6.4)
  - Dewatering (3.6.5)

### **Exploration drilling (section 3.7)**

- Life of RAS underground mine could potentially be extended to increase annual production rate
- Surface exploration drilling to continue – as part of MEP60311
- Further consents / authorisations will be applied for, outside FTAA
- Extensive earthworks (0.5 to 1.5 ha) to be undertaken for exploration purposes – within SRX gold deposit in proximity to SRX and SRE open pits as part of substantive application
- Earthworks undertaken in staged manner with progressive restoration of worked areas

### **Erosion and sediment control (section 3.8)**

- Proposed erosion and sediment control measures included as part of overall application document

- Measures include clean water diversion channels and bunds, sediment retention ponds, decanting earth bunds, staged stripping of ELF and TSF footprints, dust suppression etc

### **Processing facilities and supporting infrastructure (section 3.9)**

- Processing plant, supporting infrastructure and ancillary activities located across two areas
  - Shepherd's Valley site – reclamation of section of Shepherds Creek to establish all-purpose service corridor (visually screened). 6.2 ha area to accommodate processing plant and supporting infrastructure. Total area of SV site, including processing plant site, will cover approx. 23.3 ha
  - Ardgour Terrace site – 27 ha area located outside SV on agricultural land, containing non-operational infrastructure including admin building, security and medical facilities, warehousing, geology complex, temporary construction workers accommodation etc



Figure 3-13: Overview of the Shepherds Valley Site and Ardgour Terrace Site for the Bendigo-Ophir Gold Project

#### **Shepherds Valley Site – processing plant and supporting infrastructure (section 3.9.1)**

- SV site comprised of 2 distinct areas – Shepherds Service Corridor and Processing Plant Area

##### **Shepherds Service Corridor (section 3.9.1.1)**

- Approx. 3.1 km of Shepherds Creek proposed to be reclaimed to establish service corridor – permanently realigned against northern (true right) valley wall in form of

diversion channel (Shepherds CWDC) – channel design to achieve natural flow features including placement of rocks, soil & salvaged plants

- Corridor will enable safe routing of power, raw & potable water, comms, wastewater, tailings, TSF decant water, seepage and light vehicles
- Corridor will be constructed in early part of project development phase
- Surface water runoff from corridor will be captured in sediment retention pond(s)
- Functional need to reclaim sections of Shepherds Creek (and associated tributaries) assessed in Boffa Miskell (2025a)

#### **Processing plant area (section 3.9.1.2)**

- Site platform established to accommodate processing plant and supporting infrastructure/buildings (1000 m long and 120 m wide)
- Processing plant will be conventional hard rock gold processing plant using Carbon-in-Leach. Processing rate = 1.2 mill tonnes/year initially expandable to 1.8 mill tonnes when RAS underground mine comes into production
- ROM pad located east of processing plant – will serve as central stockpile area for ore to be temporarily stored after being extracted before being sent to plant for further treatment. Pad will contain up to 14 days of stockpiled ore to provide buffer between mines and processing plant
- ROM pad sloped to ensure all surface water runoff is captured in dedicated sediment retention pond(s)
- Low grade ore stockpiled in dedicated area within Shepherds ELF footprint. Surface runoff to be directed to Shepherds Silt Pond prior to release into Shepherds CWDC
- Processing plant to operate 24 hours/day with specially designed lighting
- Tailings pumped to tailing storage facility
- Figure 3-13 = general arrangement of processing plant
- In addition to processing plant and ROM pad, SV site will also include establishment of various other facilities including temp facilities(portacoms); goods warehouses; light and heavy vehicle workshops; fuel storage; cement paste plant & mobile concrete batching plant

#### **Closure and Rehabilitation (section 3.9.1.3)**

- Processing plant and associated infrastructure will be removed as part of mine closure. Some infrastructure and services (e.g. power, water, small sheds) may be retained under agreement with Station owners
- Water Treatment Plant will be established towards the end of mine life & located within processing plant footprint
- SV Service Corridor will be retained. Surface features removed (pipelines and sediment retention ponds) while buried services will remain. Corridor will be reprofiled to facilitate surface runoff from surrounding area into SV Stream Diversion

**Ardgour Terrace Site (section 3.9.2)**

- ATS will contain non-operational infrastructure including admin office (550 m<sup>2</sup>), geology office, core storage area, construction camp (50 persons but expandable to 80 persons), WWTP, laydown areas etc – Figure 3-17
- Will have own water supply & ww treatment

**Shepherds Creek Stream Diversion (section 3.10)**

- Establishment of Shepherds Creek Service Corridor (SCSC) will require reclamation of approx. 1.3 km of Shepherds Creek
- To enable continued capture and conveyance of surface flows through SC catchment, SC to be diverted along northern extent of SCSC and into rehabilitated stream diversion known as Shepherds Stream Diversion

Released under the Official Information Act

## Summary of reports provided by Santana Minerals as part of pre-lodgement consultation

- Santana have provided a register of the assessments / technical reports etc that are being prepared in support of the substantive application.
- Reports included on the Document Register but not made available to DOC, as of 20/10/25:
  - Ecology – numerous reports (habitat impact, terrestrial invertebrate MP, avifauna MP...)
  - Water (hydrology management plan)
  - Geochemistry
  - Contaminated land
  - Landscape Rehabilitation Plan
  - Mine rehab overview and ecological values post-rehab
  - Cultural Impact Statement
  - Social Impact Statement
  - Planning – fast track application

### 26.8.25 UPDATE:

Two reports received and summarised in the table below:

- Lizard Values Assessment prepared by RMA Ecology Ltd (sent to Mandy 1.9.25)
- Vegetation Values Assessment prepared by RMA Ecology Ltd (sent to Max Crowe 26.8.25)

### 28.8.25 UPDATE:

Two reports received and summarised in the table below:

- Avifauna Values Assessment prepared by RMA Ecology Ltd (sent to Rogan 1.9.25)
- Wetland Values Assessment prepared by RMA Ecology Ltd (sent to Max 1.9.25)

### 1.9.25 UPDATE:

Updated addendum received and summarised in the table below:

- Economic impacts of the BOGP – updated for June 2025 pre-feasibility study

### 6.10.25 UPDATE:

Management plan received and summarised in the table below:

- Lizard Management Plan (sent to Mandy)

Report title & author	Report scope / summary	Potential effects relate to	Mitigations included / recommended	DOC interest	DOC delegation	Technical expert reviewed (Y/N) <i>Please also include link to your comments. Save here: <a href="#">Technical Experts Assessments</a></i>
<p><b>AIR QUALITY</b></p> <p><b>Assessment of Environmental Effects from the discharge of contaminants into air</b></p> <p>Author: Pattle Delamore Partners Ltd Date: 5 June 2025 Job ref: C051440001 <a href="#">Air Quality Assessment of Effects.pdf</a></p>	<p>Air quality assessment for dust and gaseous emissions</p>	<p>Ecological:</p> <ul style="list-style-type: none"> <li>Native annual herbs found within 100m of key dust sources (refer to fig 33, p81)</li> <li>Species not identified in report</li> <li>Impact of dust discharged on herbs will be high for plants within 100m of key dust sources, moderate for plants located 100-200m and low on plants &gt;200m</li> <li>Assessment = not expected to pose any toxicological effects to flora</li> </ul> <p>Amenity:</p> <ul style="list-style-type: none"> <li>Dust being deposited on surfaces – less than minor</li> </ul> <p>Health:</p> <ul style="list-style-type: none"> <li>Particulate matter &amp; gaseous contaminants inhaled by people</li> </ul>	<ul style="list-style-type: none"> <li>Air Quality Management Plan (AQMP) – purpose and intended content/structure (section 13, p105) – see below for AQMP which has now been completed</li> <li>Scope &amp; type of conditions of consent (section 14, p106)</li> </ul> <p>Nothing specific suggested in draft AQMP or as part of consent conditions seems to relate directly to ecological effects</p>	<ul style="list-style-type: none"> <li>Ecological effects (section 10). Ecological survey has been undertaken in project area. Native annual herb found</li> <li>Native herb fields to be re-established at the completion of mining activities. Details not provided as to what this would involve – will presumably be included in relevant ecology report(s)</li> <li>DOC may wish to suggest conditions of consent in relation to re-establishment</li> </ul>	<p>Vegetation – Richard Ewans</p>	<p>Terrestrial ecosystem &amp; botanical comments – allocated to external contractor Max Crowe (Field Lab)</p>
<p><b>AIR QUALITY</b></p> <p><b>Air Quality Management Plan</b></p> <p>Author: Pattle Delamore Partners Ltd Date: July 2025 Rev: FINAL-R1 <a href="#">Air Quality Management Plan.pdf</a></p>	<p>Summary of key information on sources, mitigation and monitoring of air contaminants.</p> <p>Actions and measures to ensure that (proposed) conditions of consent can be met in relation to dust discharges</p>	<p>As noted above for Assessment</p>	<ul style="list-style-type: none"> <li>Dust / gaseous air contaminants monitoring</li> <li>Watering systems</li> <li>Meteorological monitoring</li> </ul>	<ul style="list-style-type: none"> <li>May be interested in relation to effects on vegetation – not specifically covered by AQMP</li> </ul>	<p>Vegetation – Richard Ewans</p>	
<p><b>AQUATIC ECOLOGY</b></p> <p><b>Bendigo Ophir Gold Project: Assessment of Effects on Aquatic Ecology</b></p> <p>Author: Water Ways Consulting Date: June 2025</p>	<ul style="list-style-type: none"> <li>Aim of report = characterise streams, aquatic fauna and adjacent watercourses &amp; assess effects on the streams (in particular</li> </ul>	<ul style="list-style-type: none"> <li>Complete loss of habitat that is either buried or excavated</li> <li>Stream diversions</li> <li>Changes to stream flow</li> <li>Changes in water quality</li> </ul>	<p>Report does not discuss potential mitigation, offsetting or compensation</p>	<ul style="list-style-type: none"> <li>Loss of stream habitat, stream diversions, changes to stream flow and water quality</li> <li>Assessment of Effects section 6, p72</li> </ul>	<p>Freshwater – Nicholas Dunn</p>	<p>Yes.</p> <p><a href="#">MEMO - Fast Track – FTA107 – Bendigo-Ophir Gold Project – freshwater advice – N Dunn 240825 - DOC-10432564.docx</a></p>

Report title & author	Report scope / summary	Potential effects relate to	Mitigations included / recommended	DOC interest	DOC delegation	Technical expert reviewed (Y/N) <i>Please also include link to your comments. Save here: <a href="#">Technical Experts Assessments</a></i>
Report No. 38-2024A <a href="#">250528 Aquatic Assessment Report Bendigo FINAL.docx</a>	Shepherds Creek and Rise & Shine Creek) <ul style="list-style-type: none"> <li>Watercourse mapping</li> <li>Stream State Assessment</li> <li>Fish assessment (electric fishing, historic data and eDNA)</li> <li>Macroinvertebrates (previous data, samples, eDNA)</li> </ul>			<ul style="list-style-type: none"> <li>Refer fig 5, p24 which shows water courses and conservation area</li> </ul>		
<b>BOND</b> <b>Bendigo-Ophir Gold Project Bond Introduction</b> Author: Lane Associates Ltd Date: 27 May 2025 <a href="#">Matakanui Bond Introduction-e.pdf</a>	<ul style="list-style-type: none"> <li>Matakanui expecting consent conditions that require a bond to cover cost of rehabilitation of site post-closure</li> <li>Outlines the process used for quantifying cost of rehabilitation of the site (&amp; bond payable)</li> </ul>			Bond jointly held by ORC and CODC and perhaps DOC	Concessions permissions advisor – Carl Jones  <b>Potentially we need a commercial team member here for the concession component too.</b>	Y - N/A to Permissions/ Commercial given mine isn't on PCL. (CJ)  <a href="#">Bendigo-Ophir Gold FT - Permissions Pre-App Comments.docx</a>
<b>ECOLOGY</b> <b>Mammalian Pest Survey</b> Author: Habitat NZ Ltd Date: May 2025 Project No. 1801-1123 <a href="#">20250515 BOGP Mammalian Pest Report v001.pdf</a>	<ul style="list-style-type: none"> <li>Survey of mammalian pests across 5000ha ecological study area (ESA). ESA made up of project study area and surrounding landscape (outside area of direct impact from mining) but may be used for offsetting or compensation purposes</li> </ul>	<ul style="list-style-type: none"> <li>Presence of pests in ESA</li> <li>Pests consuming:               <ul style="list-style-type: none"> <li>native vegetation including at risk – declining species</li> <li>native vertebrates (native skinks)</li> <li>invertebrates</li> </ul> </li> </ul>	None – survey informs AEE	Impacts on vegetation, native vertebrates and invertebrates from pests present in vicinity	Vegetation – Richard Ewans Invertebrates – Warren Chinn Lizards – Mandy Tocher (contractor)  It is shown on the Landscape Mitigation Plan (page 288 of the Mine Closure Plan) (see below) that lizards will be relocated to one of two pest exclusion areas. Presume more details are included in the AEE (ecology) and Lizard Management Plan, neither of which we currently have access to.	

Report title & author	Report scope / summary	Potential effects relate to	Mitigations included / recommended	DOC interest	DOC delegation	Technical expert reviewed (Y/N) <i>Please also include link to your comments. Save here: <a href="#">Technical Experts Assessments</a></i>
	<ul style="list-style-type: none"> <li>Provides baseline of pest community within ESA</li> <li>Pests detected include feral cats, deer, goats &amp; pigs, hedgehogs, mice, mustelids, possums, rabbits and rats</li> </ul>					
<p><b>ECOLOGY</b></p> <p><b>Native Bat Survey</b></p> <p>Author: Habitat NZ Ltd</p> <p>Date: May 2025</p> <p>Project No. 1217-2401</p> <p><a href="#">20250515 BOGP Native Bat Survey Final v001.pdf</a></p>	<ul style="list-style-type: none"> <li>Native bat survey across ESA</li> <li>No bats found but occasional presence cannot be ruled out</li> </ul>	Report concludes bats not likely to be affected by proposed mining activities and no further consideration of bats required	None – survey informs AEE	<ul style="list-style-type: none"> <li>Report notes that DOC records indicate long-tailed bats may be present in the immediate area of Dunstan Mountains</li> <li>National Bat Database indicated single isolated long-tailed bat record 2km south of survey area. As it was close to site, it indicated that long-tailed bats could be present. However, record was removed from database due to degree of uncertainty around validity of recording. Following this, closest recording of bat activity is at least 60km from site</li> </ul>	<p>Darcy Liddell – would you be able to look into this please.</p> <p>Does it look like it may warrant a bat expert? Do we think they may actually need a permission?</p> <p>We can request expertise if needed.</p> <p><b>We do not have a bat expert for this project currently.</b></p>	<p>Yes.</p> <p>Darcy's comments saved here: <a href="#">Technical Expert Assessment – Darcy Liddell – Permissions Ad.docx</a></p>
<p><b>ECOLOGY</b></p> <p><b>Terrestrial Invertebrate Survey</b></p> <p>Author: Habitat NZ Ltd</p> <p>Date: May 2025</p> <p>Project No. 1801-1123</p> <p><a href="#">20250519 BOGP Terrestrial Invertebrate Survey Final v001.pdf</a></p>	<ul style="list-style-type: none"> <li>Creates baseline of terrestrial invertebrate communities located within ESA</li> <li>Results demonstrate the area's invertebrate biodiversity and emphasise importance of thoughtfully addressing potential</li> </ul>	Impacts on native invertebrates found in study area	None – survey informs AEE	<ul style="list-style-type: none"> <li>Impacts on native invertebrates found in study area</li> <li>222 native species found including 18 notable species: <ul style="list-style-type: none"> <li>- Moths (Threatened &amp; At-Risk)</li> <li>- 4 new species (1x weevil &amp; 3x ground beetles)</li> </ul> </li> </ul>	Invertebrates – Warren Chinn	

Report title & author	Report scope / summary	Potential effects relate to	Mitigations included / recommended	DOC interest	DOC delegation	Technical expert reviewed (Y/N) <i>Please also include link to your comments. Save here: <a href="#">Technical Experts Assessments</a></i>
	consequences of mining operations			<ul style="list-style-type: none"> <li>- 9 at-risk species (including moths, grasshopper)</li> <li>- 1 unassessed moth species – thought to be of conservation importance</li> <li>• Key findings pages 6-7</li> </ul>		
<p><b>ECOLOGY</b> <b>Vegetation Values Assessment</b> Author: RMA Ecology Ltd Date: 8 August 2025 Report No. 2352 <a href="#">2352 Matakanui vegetation values 8August2025.issued.pdf</a></p>	<ul style="list-style-type: none"> <li>• Forms basis of an Ecological Effects Assessment (prepared by Alliance Ecology Ltd – we haven't been provided with a copy thus far)</li> <li>• Describes vegetation values</li> <li>• Report concludes that disturbance footprint contains very high ecological value &amp; ecologically significant vegetation communities including at least 48 nationally or regionally at-risk or threatened plant species</li> <li>• Field survey undertaken over 16 months</li> </ul>	<ul style="list-style-type: none"> <li>• Physical clearance of vegetation</li> <li>• Fragmentation</li> <li>• Loss of buffering to vegetation communities (&amp; edge effects)</li> <li>• Introduction and spread of weeds</li> <li>• Deposition of dust on vegetation</li> <li>• Farming practices may result in change to vegetation communities</li> <li>• Alterations to surface and ground water hydrology</li> </ul>	None – values assessment feeds into the Ecological Effects Assessment	<ul style="list-style-type: none"> <li>• Impacts from vegetation clearance in project area</li> <li>• Loss of at-risk and threatened species</li> </ul>	Vegetation – Richard Ewans	<p>Terrestrial ecosystem &amp; botanical comments – allocated to external contractor Max Crowe (Field Lab)</p> <p>Max's assessment saved here: <a href="#">BOGP_preapp_vegetation_advice_20250905.docx</a></p>
<p><b>ECOLOGY</b> <b>Lizard Values Assessment</b> Author: RMA Ecology Ltd Date: 5 August 2025 Report No. 2352</p>	<ul style="list-style-type: none"> <li>• Describes lizard values within direct disturbance footprint (DDF) &amp; compares the values to those of surrounding ESA</li> </ul>	<ul style="list-style-type: none"> <li>• Habitat clearance, temporary loss of habitat</li> <li>• Net loss of some habitats that may not be able to be replicated in rehabilitation areas e.g. herbfield-cushionfield</li> </ul>	None discussed directly	<ul style="list-style-type: none"> <li>• Impact on lizard populations within the DDF</li> </ul>	Lizards – Mandy Tocher	<p>Yes</p> <p><a href="#">BHV feedback on assessments and application documents Bendigo Ophir Gold Project - Lizards.docx</a></p>

Report title & author	Report scope / summary	Potential effects relate to	Mitigations included / recommended	DOC interest	DOC delegation	Technical expert reviewed (Y/N) <i>Please also include link to your comments. Save here: <a href="#">Technical Experts Assessments</a></i>
<a href="#">2352 Matakanui lizard values 5August2025.issued.pdf</a>	<ul style="list-style-type: none"> <li>Three native species were recorded in DDF &amp; ESA</li> <li>No frogs or exotic lizards were detected</li> <li>McCann's skink, Kawerau gecko &amp; tussock skink</li> </ul>	<ul style="list-style-type: none"> <li>Disruption to lizard communities through salvage &amp; relocation</li> <li>Injury and/or death to a small portion that are not relocated prior to habitat removal</li> </ul>				
<p><b>ECOLOGY</b></p> <p><b>Lizard Management Plan</b></p> <p>Author: Alliance Ecology</p> <p>Date: 24/09/2025 (V4)</p> <p><a href="#">Lizard Management Plan September 2025.pdf</a></p>	<ul style="list-style-type: none"> <li>Avoid or minimise adverse effects on indigenous lizards during construction and operation of mine</li> <li>Sets out methods for avoiding and minimising adverse effects</li> <li>Handling of lizards; capture, relocation and release from DDF; and inadvertent injury and death and accidental discovery (threatened species)</li> </ul>	<ul style="list-style-type: none"> <li>Described in section 4.2 of LMP</li> <li>Vegetation and habitat loss</li> <li>Habitat edge effects/degradation</li> <li>Direct mortality or injury</li> <li>Habitat fragmentation and isolation</li> <li>Disturbance relating to noise, vibrations or dust</li> </ul>	<ul style="list-style-type: none"> <li>General refinement of DDF through detailed design and construction methodology</li> <li>Refining stockpile and infrastructure locations to minimise impacts on rocky outcrops</li> <li>Seasonal constraints on vegetation and habitat clearance within 'high' and 'moderate' value lizard habitat earmarked for salvaging</li> <li>Habitat clearance protocols</li> <li>Habitat clearance salvage and relocation operations for all 3 legally protected species</li> <li>Measures to address effects on lizards and other terrestrial biodiversity values that cannot be avoided or minimised set out in: <ul style="list-style-type: none"> <li>Landscape and Ecological Rehabilitation MP (LERMP)</li> <li>Ardgour Restoration Area MP (ARAMP) and</li> <li>Matakanui Sanctuary MP (MSMP)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Management of lizards (relocation etc)</li> </ul>	Lizards – Mandy Tocher	Yes

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<p><b>ECOLOGY</b></p> <p><b>Avifauna Values Assessment</b></p> <p>Author: RMA Ecology Ltd</p> <p>Date: 8 August 2025</p> <p>Report No. 2352</p> <p><a href="#">2352 Matakanui avifauna values 8August2025.issued.pdf</a></p>	<ul style="list-style-type: none"> <li>Ecological context</li> <li>Desktop assessment of avifauna values</li> <li>Field survey of terrestrial, wetland &amp; aquatic avifauna values</li> <li>Bird species inventory</li> <li>Assessment – distribution, abundance &amp; species richness</li> </ul>	<ul style="list-style-type: none"> <li>Effects on avifauna values (included in AEE, still to come)</li> <li>Habitat loss &amp; degradation</li> <li>Direct mortality</li> <li>Disturbance effects</li> <li>Vehicle strike</li> <li>Habitat fragmentation / loss of ecological connectivity</li> <li>Electrocution</li> </ul>	None discussed directly – will be included in the AEE	<p>Entire report including:</p> <ul style="list-style-type: none"> <li>Executive summary, p6</li> <li>Figure 2, p12 (DDF v ESA)</li> <li>Purpose &amp; scope (section 1.2), p13</li> <li>Ecological study area (section 1.3), p14</li> <li>Methods (section 2.0), p16</li> <li>Results (section 3.0), p24</li> <li>Potential effects (section 4.0), p49</li> </ul>	Avifauna – Rogan Colbourne	
<p><b>ECOLOGY</b></p> <p><b>Wetlands Values Assessment</b></p> <p>Author: RMA Ecology Ltd</p> <p>Date: 8 August 2025</p> <p>Report No. 2352</p> <p><a href="#">2352 Matakanui wetland values.8August2025.issued.pdf</a></p>	<p>Report is limited to assessing wetland ecological values &amp; provides brief summary of potential effects to consider in the Assessment of Environmental Effects (still being prepared).</p> <ul style="list-style-type: none"> <li>Wetland values – 290 natural inland wetlands identified in ESA</li> <li>Methods used to investigate wetland extent and type</li> <li>Ecological context of ESA &amp; wider Dunstan Mts</li> <li>Classification/description of wetlands</li> <li>Wetland plant species inventory</li> <li>Assessment of wetland condition</li> </ul>	<ul style="list-style-type: none"> <li>Loss of wetland area</li> <li>Reduction in condition of wetlands (due to earthworks and vegetation clearance)</li> <li>Surface &amp; ground water diversion</li> <li>Indirect effects – discharges to Fstreams &amp; wetlands</li> </ul>	None discussed directly – will be included in the AEE	<p>Entire report including:</p> <ul style="list-style-type: none"> <li>Executive summary, p6</li> <li>Introduction (section 1.0)</li> <li>Methods (section 2.0)</li> <li>Results (section 3.0)</li> <li>Potential effects (section 4.0)</li> </ul>	Terrestrial ecology / botany – Max Crowe	<p>Max's assessment saved here: <a href="#">BOGP_preapp_vegetation_advice_20250905.docx</a></p>

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	& value/significance					
<b>ECONOMIC</b> <b>Bendigo-Ophir Gold Project Socio-Economic Baseline Assessment</b> Author: Rationale Ltd Date: 3 May 2024, Rev 2.0 <a href="#">BOGP_SE Baseline v2.0 final.pdf</a>	Provides a baseline describing existing socio-economic context without the project (will form a baseline on which future socio-economic impact assessments can be undertaken)	Community and environmental values			Potentially RMA?	
<b>ECONOMIC</b> <b>Economic Impacts of the Bendigo-Ophir Gold Project</b> Author: Benje Patterson Date: Feb 2025, Version 5 <a href="#">Economic impacts of the Bendigo-Ophir Gold Project_FINAL (1).pdf</a> Addendum received 1.9.25 <b>Memo – economic impacts of the Bendigo-Ophir Gold Project updated for pre-feasibility study – June 2025</b> <a href="#">Memo - Economic impacts of BOGP updated for June 2025 Pre-Feasibility Study.pdf</a>	Quantifies potential economic impacts of project (including environmental mitigation)  Expected cumulative direct GDP effects of the mine on Otago economy projected to be \$5.8 billion (June 2025) – up from \$4.5 billion (Nov 2024 study)				Could be applicable for concession fee fixing (Commercial team).	Y - N/A to Permissions/ Commercial - mine not on PCL (CJ)
<b>HERITAGE</b> <b>Archaeological Management Plan (AMP)</b> Author: NZ Heritage Properties Ltd	AMP outlines procedures to be followed to manage	<ul style="list-style-type: none"> <li>Modification of archaeology</li> <li>Archaeological features present (stone huts, hut/house terraces, dam,</li> </ul>	Archaeological Management Plan	How impacts will be managed on archaeological features present	Heritage Advisor – Matt Schmidt (looking to outsource)	Yes. <a href="#">Fastrack - Matt Schmidt review of heritage assessments.docx</a>

Report title & author	Report scope / summary	Potential effects relate to	Mitigations included / recommended	DOC interest	DOC delegation	Technical expert reviewed (Y/N) <i>Please also include link to your comments. Save here: <a href="#">Technical Experts Assessments</a></i>
Date: 13/5/2025, Rev A <a href="#">Archaeological Management Plan.pdf</a>	impacts on archaeology <ul style="list-style-type: none"> <li>• Read in conjunction with Heritage Assessment – see below</li> <li>• Archaeological Authority has been applied for through HNZPT to modify archaeology</li> <li>• AMP includes:               <ul style="list-style-type: none"> <li>- Responsibilities for archaeologist &amp; contractor</li> <li>- On-site briefings</li> <li>- Areas where approved person must be present</li> <li>- Timeframes/st and down periods</li> <li>- Archaeology to be protected</li> <li>- Requirements for recording of features or deposits encountered</li> </ul> </li> </ul>	revetted road, affected portion of water races etc)		(entire report is useful)		
<b>HERITAGE</b> <b>Heritage Assessment</b> Author: NZ Heritage Properties Ltd (Naomi Woods & Claire Thorrold) Date: 11/04/2025, Rev A <a href="#">Heritage Assessment.pdf</a>	<ul style="list-style-type: none"> <li>• Heritage assessment of project area</li> <li>• Numerous archaeological sites present – including some discovered/record</li> </ul>	<ul style="list-style-type: none"> <li>• Numerous archaeological sites identified including some protected under the existing covenant. Some previously unrecorded sites discovered during site survey work</li> </ul>	<ul style="list-style-type: none"> <li>• Recommendations made for archaeological authority p5-6 and for consent p6-9</li> <li>• Archaeological Management Plan (separate doc)</li> </ul>	<ul style="list-style-type: none"> <li>• Heritage values present, expected impacts/management</li> <li>• Executive Summary p3-5</li> <li>• Methodology – section 3</li> </ul>	Heritage Advisor – Matt Schmidt	Yes. See link above.

Report title & author	Report scope / summary	Potential effects relate to	Mitigations included / recommended	DOC interest	DOC delegation	Technical expert reviewed (Y/N) <i>Please also include link to your comments. Save here: <a href="#">Technical Experts Assessments</a></i>
	ed during site survey	<ul style="list-style-type: none"> <li>Heritage values: effects assessed as low to medium-high</li> <li>Heritage values: magnitude of impact assessed as 'no impact' to major</li> <li>Effects on archaeology (structure(s), where applicable and subsurface): partial or full removal</li> <li>Areas of highest heritage values (Bendigo Covenant Area &amp; Bendigo Quartz Reef Historic Area) fall outside project footprint &amp; will not be impacted by proposed works</li> </ul>		<ul style="list-style-type: none"> <li>Historical background – section 5</li> <li>Previous investigations – section 6</li> <li>Site surveys – section 7</li> <li>Heritage values – section 9</li> <li>Assessment of effects – section 10</li> <li>Mitigation outlined in Section 10.1.3</li> </ul>		
<b>HERITAGE</b> <b>Heritage Assessment: Construction Camp</b> Author: NZ Heritage Properties Ltd (Naomi Woods) Date: 13/2/2025, Rev B <a href="#">Heritage Assessment.pdf</a>	Heritage assessment relating to part of project area for construction camp & admin area (sites G41/4, G41/5, G41/6 & G41/790)	Impacts on four sites (including 1 previously unrecorded) located within part of project area where camp & admin area will be constructed <ul style="list-style-type: none"> <li>Effects on heritage values – low to med-high with magnitude of impact ranging from no impact to major</li> </ul>	Recommendations made p3-5	Heritage values present & likely impacts <ul style="list-style-type: none"> <li>Methodology – section 3</li> <li>Historical background – section 5</li> <li>Previous investigations – section 6</li> <li>Site surveys – section 7</li> <li>Heritage values – section 9</li> <li>Assessment of effects – section 10</li> </ul>	Heritage Advisor – Matt Schmidt	Yes. See link above.
<b>HERITAGE</b> <b>Magazine and Emulsion Tank (short report)</b> Author: NZ Heritage Properties Ltd (Naomi Woods) Date: 28/03/2025 <a href="#">Magazine and Emulsion Tanks.pdf</a>	Identify the presence and nature of any heritage sites within proposed location of magazine and emulsion tank (desktop assessment)	No previously recorded archaeological sites present	3x recommendations made p2	N/A – no sites present however may wish to review report to ensure agreement with conclusions reached	Heritage Advisor – Matt Schmidt	Yes. See link above.
<b>HERITAGE</b> <b>Ardgour Rise Realignment (short report)</b>	Identify the presence and nature of any heritage sites within	No previously recorded archaeological sites present	3x recommendations made p2-3	No sites present however may wish to review report to ensure	Heritage Advisor – Matt Schmidt	Yes. See link above.

Report title & author	Report scope / summary	Potential effects relate to	Mitigations included / recommended	DOC interest	DOC delegation	Technical expert reviewed (Y/N) <i>Please also include link to your comments. Save here: <a href="#">Technical Experts Assessments</a></i>
Author: NZ Heritage Properties Ltd (Naomi Woods) Date: 17/04/2025 <a href="#">Ardgour Rise Realignment.pdf</a>	Ardgour Rise road realignment (desktop assessment)			agreement with conclusions reached		
<b>HERITAGE</b> <b>Come-in-Time CIT Battery Access Track (short report)</b> Author: Claire Thorrold Date 17/04/2025 <a href="#">Come In Time battery access track area.pdf</a>	Identify the presence and nature of any heritage sites within the CIT battery access track area desktop assessment)	23 previously recorded archaeological sites present within the track or within 20m of the track however all sites will be avoided during the works	3x recommendations made p4-5	Sites present but not impacted however may wish to review report to ensure agreement with conclusions reached	Heritage Advisor – Matt Schmidt	Yes. See link above.
<b>CLOSURE</b> <b>Bendigo-Ophir Gold Project Plan</b> Author: Mine Closure Management PTY Ltd Date: 5 June 2025 Ref: J-NZ0454-002-R-Rev1 <a href="#">Bendigo-Ophir Gold Project Mine Closure Plan.pdf</a>	<ul style="list-style-type: none"> <li>Describes strategies to be implemented to manage closure risks and to meet proposed closure outcomes</li> <li>Closure outcomes include cultural heritage, revegetation, hydrology, hydrogeology (pit lakes) ...</li> <li>Post-mine land use (PMLU) = to return majority of land to pastoralism with areas of ecological uplift in line with current surrounding and underlying land use</li> </ul>	<ul style="list-style-type: none"> <li>Closure of mine and how impacts will be minimised, landform remediated etc</li> </ul>	<p>Suggested conditions of consent included – section 3.2, p24</p> <ul style="list-style-type: none"> <li>revegetation of native species where appropriate</li> <li>PMLU will be developed in consultation with landowners, regulatory bodies etc</li> </ul>	<ul style="list-style-type: none"> <li>Closure outcomes summary p5-6. Also refer to table 7, p38</li> <li>DOC identified as stakeholder relevant to closure planning (section 4.1, p27)</li> <li>Rehabilitation management (landform surface treatment, seed management, planting strategies, fauna habitats) section 9.6, p55</li> <li>C.3.6 fauna, p131</li> </ul>	<p><b>Carl? Concessions/Legal?</b></p> <p>Richard Ewans – revegetation elements</p> <p>Matt Schmidt – heritage elements</p> <p>Nicholas Dunn – freshwater</p>	<p>Y - N/A to Permissions – mine not on PCL. District/Legal will have interest given current covenant values needing protection. (CJ)</p> <p>Max (botany) has commented on the vegetation aspects.</p> <p>Max's assessment saved here: <a href="#">BOGP_preapp_vegetation_advice_20250905.docx</a></p>
<b>LIGHTING</b> <b>Exterior Lighting Report</b> Author: Cosgroves Date: 15/05/2025	Expected effects and mitigation of exterior lighting			TBC	<p><b>May be relevant in relation to birds (and bats?).</b></p> <p>Birds – Rogan Colbourne.</p>	

Report title & author	Report scope / summary	Potential effects relate to	Mitigations included / recommended	DOC interest	DOC delegation	Technical expert reviewed (Y/N) <i>Please also include link to your comments. Save here: <a href="#">Technical Experts Assessments</a></i>
Ref: CQ24020, Rev C <a href="#">CQ24020 BOGP Exterior Lighting Report Rev C FINAL.pdf</a>						
<b>NOISE</b> <b>Assessment of Noise and Vibration Effects</b> Author: Marshall Day Acoustics Date: 13 May 2025 Ref: Rp 001 R02 20230685 <a href="#">Assessment Of Noise &amp; Vibration Effects_FINAL.pdf</a>	Assessment of operational noise and vibration	Noise and vibration	Consent conditions (noise limits, management plan etc)	TBC	<b>As above. Unsure if noise effects would be relevant to avifauna.</b> Birds – Rogan Colbourne.	
<b>NOISE</b> <b>Noise and Vibration Management Plan</b> Author: Marshall Day Acoustics Date: 27 June 2025 Rev: R02 <a href="#">Noise and Vibration Management Plan.pdf</a>	Outlines strategies and procedures to manage and mitigate noise and vibration	Noise and vibration		TBC	<b>As above. Unsure if noise effects would be relevant to avifauna.</b> Birds – Rogan Colbourne.	
<b>RECREATION</b> <b>Recreation Assessment</b> Author: Rob Greenaway & Associates Date: June 2024 <a href="#">Matakanui Bendigo-Ophir recreation assessment Final 12 June 2025.pdf</a>	<ul style="list-style-type: none"> <li>Effects assessment on recreation values and opportunities in Rise and Shine and Shepherds Creek catchments and those accessed via Thomson Gorge Rd</li> </ul> <p>(Thomson Gorge Rd is regionally significant thoroughfare &amp; setting for cycling, horse riding, hunting and four-wheel driving)</p>	<ul style="list-style-type: none"> <li>Loss of access to important recreation activities – access will be lost during establishment and operation of mine</li> <li>Temporary loss of access to Come in Time (CIT) battery</li> </ul>	<ul style="list-style-type: none"> <li>Mine rehabilitation plan = reinstate the recreation opportunities which currently exist e.g. cycle/walking/equestrian track</li> </ul> <p>Measures proposed to mitigate loss of access along Thomson Gorge Rd:</p> <ul style="list-style-type: none"> <li>Developing Ardgour Rise as alternative access</li> <li>Viewing area of mine activity</li> <li>Maintenance of existing access to Ardgour and Bendigo Conservation Areas</li> <li>Alternative walking access to Come in Time battery (via Bendigo Historic Reserve)</li> <li>Consideration of cycle traffic on Ardgour Rise</li> </ul>	Impacts on recreational values including loss of access Proposed mitigation for loss of access etc Section 4 (DOC)	<b>Could relate to concession fees (Commercial)/Revocation of the covenant)?</b> <b>We don't have a recreation advisor on the current team – identifying resource in progress</b>	Y - Permissions comments relate to relocation of access onto PCL. (CJ) See link above.

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<b>TRAFFIC</b> <b>Integrated Transport Assessment (ITA)</b> Author: Stantec Date: 13 May 2025 Project/file: 310206156 <a href="#">Integrated Transport Assessment.pdf</a>	Travel impacts of proposal, how it affects existing roads etc, including mitigation measures	<ul style="list-style-type: none"> <li>Access to recreation and heritage sites within PCL</li> </ul>	<ul style="list-style-type: none"> <li>Project Traffic Management Plan to manage construction traffic effects while site is established</li> <li>Traffic Management Plan</li> <li>Improvements to road network connecting to SH8 (safety improvements, road widening, barriers etc, alternate route)</li> </ul>	Access to recreation and heritage sites as a result of the proposal & the proposed mitigations  <b>Roading changes</b>	<b>Recreation advisor?</b>	Y - Need to involve SLM to swap/dispose of land/change purpose. (CJ)  See link above.
<b>TRAFFIC</b> <b>Access Road Construction Traffic Management Plan (TMP)</b> Author: Matakanui Gold Limited Date: 23.05.2025, Rev 1 <a href="#">Integrated Transport Assessment.pdf</a>	<ul style="list-style-type: none"> <li>CTMP = ensure safe &amp; efficient movement of vehicles, pedestrians and cyclists in and around the work site</li> <li>Includes strategies, signage and control measures to protect road users and workers during construction phase</li> </ul>			Not relevant	<b>Recreation advisor?</b>	
<b>GROUNDWATER</b> <b>Groundwater Existing Environment &amp; Effects Assessment</b> Author: Kōmanawa Solutions Ltd Date: 30.04.2025 Report No. Z24002BOG-1 <a href="#">Groundwater - existing environment &amp; effects assessment.pdf</a>	Assessment of effects on groundwater (abstraction, diversion, use and return)	Groundwater		<b>Would DOC be interested in impacts on groundwater?</b>  Report describes aquatic ecology & wetlands, but info has come from another report (Assessment of Effects on Aquatic Ecology, Water Ways Consulting)	Nicholas Dunn – is DOC interested in commenting on groundwater effects?	Nicolas has commented briefly on groundwater but has suggested DOC defers to council in this regard (tbc if this is appropriate).
<b>GROUNDWATER</b> <b>Groundwater Bore Take Effects Assessment</b> Author: Kōmanawa Solutions Ltd	Assessment of effects on mine bore water supply	Groundwater		<b>Would DOC be interested in impacts on groundwater?</b>	As above.	Nicolas has commented briefly on groundwater but has suggested DOC defers to council in this regard (tbc if this is appropriate).

Report title & author	Report scope / summary	Potential effects relate to	Mitigations included / recommended	DOC interest	DOC delegation	Technical expert reviewed (Y/N) <i>Please also include link to your comments. Save here: <a href="#">Technical Experts Assessments</a></i>
Date: 30.04.2025 Report No. Z24019SML-3 <a href="#">Groundwater - bore take effects assessment.pdf</a>						
<b>GROUNDWATER</b> <b>Groundwater Modelling Analysis for Mining Bendigo-Ophir Deposit</b> Author: Kōmanawa Solutions Ltd Date: 12.05.2025, version 2.0.1 <a href="#">Groundwater modelling analysis.pdf</a>	Modelling results			Not relevant		Nicolas has commented briefly on groundwater but has suggested DOC defers to council in this regard (tbc if this is appropriate).
<b>SURFACE WATER</b> <b>Surface Water &amp; Catchment Existing Environment &amp; Effects Assessment</b> Author: Kōmanawa Solutions Ltd Date: 15/05/2025 Report No. Z24002BOG-2 <a href="#">Surface water &amp; catchment - existing environment &amp; effects assessment.pdf</a>	Existing hydrological environment & assesses the effects of the proposal on the flow or volume of surface water (surface water hydrological assessment)	Surface water		Not relevant	Nicholas Dunn – may wish to review and/or comment	Yes. <a href="#">MEMO - Fast Track – FTA107 – Bendigo-Ophir Gold Project – freshwater advice – N Dunn 240825 - DOC-10432564.docx</a>
<b>SURFACE WATER</b> <b>Water Quality Compliance Limits Report</b> Author: Greg Ryder Consulting Date: 30 July 2025 Version: 4.2 (Final) <a href="#">Water Quality Compliance Limits Report.pdf</a>	Recommendations relating to water quality compliance limits to establish thresholds for chemical indicators of water quality	Water quality from mining activities		Water quality	Freshwater – Nicholas Dunn	Yes. See link above.
<b>LANDSCAPE</b> <b>Landscape, Natural Character and Visual Effects Assessment</b> Author: Boffa Miskell Date 11/07/2025 <a href="#">Landscape, Natural Character and Visual Assesment.pdf</a>	Effects assessment relating to landscape, visual and natural character effects	Landscape effects during operation and beyond – pits, engineered landforms, haul roads, buildings/structures, Thomson Gorge Rd realignment  Visual effects from private viewpoints, dwellings, roads, conservation areas  Natural character effects – creek catchments (creeks)	Landscape Mitigation Plan p184 & 185	Does briefly describe pest exclusion areas (1 <sup>st</sup> paragraph p35 and section 6.5.3.13 p41)  Also note the broader interests of the covenant.	RMA if relevant/potentially covenant related SLM.	

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<b>LANDSCAPE</b> <b>Visual Simulations</b> Author: Boffa Miskell Date: 08/07/2025	Visual simulations from various locations showing views (existing, during operations and at closure)	Visual effects on landscape and natural character	N/A			
<b>LANDSCAPE</b> <b>Landscape Mitigation Plan</b> Author: Boffa Miskell Date: 11 July 2025	1 page graphic plan	Visual effects	Included on plan		RMA if relevant. SLM – potentially related to the covenant.	
<b>LANDSCAPE</b> <b>Applied Research Plan (for conservation management, rehabilitation and expansion of cushionfield)</b> Author: Manaaki Whenua – Landcare Research Date: June 2025 <a href="#">Applied Research Plan - herbfields.pdf</a>	Management actions to enhance the area and size of herbfields	Removal of up to 92ha of herbfields from project area – significant ecological impacts	Management at 3 levels (broad/whole site; paddock; and small patch). ARP has 6 components p5	Management and replacement of herbfields – entire report useful/relevant	Richard Ewans – vegetation	Max's assessment saved here: <a href="#">BOGP_preapp_vegetation_advice_20250905.docx</a>