BATHURST
RESOURCES LIMITED

# Sustainability, Energy Use and Greenhouse Gas Emissions

## Buller Plateaux Continuation Project

**July 2026**

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# 1.0 Introduction

## 1.1 Bathurst Resources Limited

Bathurst Resources Limited and its subsidiary companies ("**Bathurst**") is New Zealand's largest coal mining company, with mining facilities in the West Coast, Waikato and Southland. It produces more than 2 million tonnes of coal each year for export and domestic markets.

## 1.2 Buller Coal Plateaux Continuation Project

Bathurst is committed to effective environmental management and sustainability in all areas of the company's business, to achieve industry best practice in managing the environmental impacts of mining and processing operations.

Bathurst is seeking authorisations through the Fast-track Approvals Act 2024 ("**FTA Act**") to progress the development of coal resources across the wider Buller Plateaux (which comprises both the Stockton Plateau and the Denniston Plateau), as part of the Buller Plateaux Continuation Project ("**the Project**" or "**BPCP**").

The purpose of the Project is to secure the approvals necessary to retain the existing infrastructure and mining operations associated with the Stockton mine and provide access to additional mining areas across the Buller Plateaux as the coal resources in the current mine areas are depleted and further coal resources for blending are required.

The Project intends to produce approximately 20 million tonnes of product coal over the next two decades, thereby supporting the mining industry's ongoing economic resilience contribution on to the West Coast (and New Zealand) during this period.

# 2.0 Uses of Bathurst's Products

More than 80 percent of the coal produced by Bathurst across its operations is metallurgical, a high-quality coal used for steel making. Coal produced by the Project is planned for sale into the export market for use primarily in steelmaking processes.

Steelmaking coal is critical to the global energy transition, as it is required for the production of solar panels, wind turbines, electric vehicles, electrical semiconductors, large-scale batteries and other innovations that will form part of the shift to a lower-carbon economy.

Bathurst is working towards a climate change goal of having 90% of its annual earnings from steel making coal. Bathurst supports a just transition to a lower-emissions global economy and recognises that steel is critical to assisting the global challenge of decarbonisation.

## 2.1 Properties of Coal from the Buller Plateaux

As mining works through the coal resources, the product quality changes. Initially production will be similar to the current Stockton coal product portfolio, being predominantly semi-hard Ro(max), high vitrinite, very low ash but higher sulphur. In 2023, Bathurst quantified the emissions savings by using one of its iron and steel manufacturing customers in India as a case study. The Indian customer blends

the Stockton coal with Australian and Indian coals, because the low ash high vitrinite content Stockton coal reduces their fuel use, the rate of slag formation in the furnace, and also improves the coke strength in the furnace. In reducing fuel use, they also save on costs. Bathurst's analysis confirmed that at this single plant alone, the benefits of using Stockton coal amounts to an annual reduction of $CO_2$ emissions of 145,000 tonnes ($tCO_2$). This reflects a reduction in the blast furnace fuel rate of 14.24 kilograms of coal per tonne of hot metal produced, at an annual plant production of 3.6 million tonnes (Mt) of hot metal.

Bathurst then extrapolated this result to its total export coal business of around 1.1 Mt per year, which equates to an average 315,000 $tCO_2$ emissions avoided each year. Bathurst obtained independent verification of these results from SGS Laboratories Limited. The report stated the derived emissions reductions are fairly calculated for the premium Stockton blend, which is Bathurst's export coal specification.

In future, a new hard coking coal rank, high vitrinite, moderate ash and lower sulphur will be produced. With a lack of investment in new coking coal products, the "Whareatea" HCC will contribute to coke strength (which also drives coke rate & hence $CO_2$ emissions in a furnace) through higher rank and high vitrinite, but will be moderate ash and lower sulphur. See below for an integrated assessment of value in use emissions savings over time.

The global steel industry contributes an estimated 7 to 11 percent of world greenhouse gas emissions. Several alternative, lower-emissions technologies are being investigated, including replacing coal with hydrogen to reduce iron ore. While the early signs show some promise, the technology is many years away from being able to be used commercially and at scale with a number of technical challenges to be overcome and requiring an enormous amount of green electricity. Even if the alternatives become readily available, it will take decades to convert the world's existing iron and steel plants to new technologies, noting many plants in China (produces over half the world's steel) and India (second largest producer) are relatively young. Coal remains an important input to the steel industry (remaining a critical mineral in the EU) and the International Energy Agency projects demand for steel to continue increasing.

Steel is also a major requirement in providing alternative technology solutions to reduce $CO_2$ emissions. For example, a five-megawatt wind turbine requires on average 900 tonnes of steel, and the average electric vehicle contains 0.9 tonnes of steel. Further, finished steel is infinitely recyclable via the Electric Arc Furnace with few extra emissions, meaning it is a sustainable product over its lifetime. And as steel intensity in an economy matures, more recycling occurs and there is much lower requirement for virgin iron units (made from raw materials using coke).

## 2.2 Buller Coal Project Value in Use Emission Assessment

Coke rate in a blast furnace is predominantly driven by coke strength (CSR, M10 & M40) and coke ash (direct impacts of fuel dilution and wasted energy, but also increased slag bulk). The balance of these positives and negatives drives the value in use of a coal, and hence emissions and pricing.

Products from Stockton have always had a significant advantage of being very low ash, even though the Ro(max) (and hence coke strength) has declined and sulphur concentration has increased as the mine progressed.

Production scenarios run in blending optimisation software with the objective to limit the coke ash in Buller products to improve the value in use, hence emissions savings were conducted.

As the low ash products derived from the Stockton area are depleted and the comparable low ash Mt Fred South coal is incorporated and blended with high ash but higher Ro(max) Denniston coals, the sulphur in Denniston coal is lower which reduces the need to add limestone into the furnace to absorb sulphur into the slag. The balance of all these changes can be assessed using value in use modelling, with coke rate savings converted to reduction in $CO_2$ emissions per tonne of Buller coal used in the blend.

Value in Use modelling has been undertaken to understand the potential coke rate savings for the coking coal products. Products assessed are:

- Stockton PHCC transitioning to var PHCC
- Stockton Alpine transitioning to var Alpine
- Whareatea SHCC transitioning to Whareatea HCC
- Granity transitioning to var Granity
- HACC (nominal E-Commodities)
- SSCC

The same modelling process as reviewed in the SGS audit of Greenhouse Gas Savings using Alpine coal in a coke blend (report 2022) was used in the current assessment, with some modifications to incorporate new information. Sulphur is maintained in hot metal by increasing limestone into the furnace, which offsets some of the ash saving benefits where sulphur is high. An Indian stamp charge blend was modelled noting this is the key growing market for steel production and hence coking coals.

Coals were selected as substitution candidates based primarily on similar Ro(max) on the assumption the new coal would fulfil a similar role in the blend. Value in Use substitutions modelled were:

- PHCC replacing Goonyella, Cook Hard & Broadmeadow (average of 3 HCC type coals)
- Alpine replacing Kestrel b & Gregory (average of 2 SHCC type coals)
- WSHCC replacing Blackwater, Dawson met & Isaac SHCC (average of 3 SHCC type coals)
- WHCC replacing Goonyella, Cook Hard & Broadmeadow (average of 3 HCC type coals)
- Granity replacing Raspadskaya, Integra & Maules Creek (average of 3 SSCC type coals)
- SSCC replacing Raspadskaya, Integra & Maules Creek (average of 3 SSCC type coals)

Calculated coke savings were converted to a $CO_2$ savings basis using stochiometric ratios assuming full oxidation of carbon in coke to $CO_2$. The derived $CO_2$ savings were then divided by the tonnes of replacement coal in the blend to get a tonnes of savings per tonne of substituting coal (PHCC, Alpine, WSHCC, WHCC, Granity HACC & SSCC respectively). The calculated emission saving factors are as follows:

- PHCC – 0.314 tonnes reduction per tonne of PHCC in blend
- Var PHCC – 0.246 tonnes reduction per tonne of var PHCC in blend
- Alpine – 0.374 tonnes reduction per tonne of Alpine in blend
- Var Alpine – 0.340 tonnes reduction per tonne of Alpine in blend
- WSHCC – 0.065 tonnes reduction per tonne of WSHCC in blend
- WHCC – 0.128 tonnes reduction per tonne of WHCC in blend
- Granity – 0.241 tonnes reduction per tonne of Granity in blend
- VAR Granity – 0.210 tonnes reduction per tonne of var Granity in blend

- HACC – 0.102 tonnes reduction per tonne of HACC in blend
- SSCC – 0.353 tonnes reduction per tonne of SSCC in blend

In the early years of the Buller project plan, the emissions reduction of delivered by continued sales of low ash coal (dominated by Stockton area production) remains substantial at ~270,000t/a emissions reduction per annum. Once the Alpine product is removed from the product mix, leaving a combination of PHCC, Whareatea and Granity/ HACC, the annual estimated emissions reduction drops to ~200,000t/a. With the cessation of PHCC production in 2035 and focus on Whareatea HCC, emissions savings drop to ~120,000t per annum.

# 3.0 Operational Sustainability

As an organisation, Bathurst continues to monitor its energy use and strive to improve and become more efficient where it can. Bathurst acknowledges that while its products play a critical role in achieving a low-carbon future and supporting a just transition, its operations have impacts on the environment.

Bathurst is consistently working to enhance energy efficiency across its operations. Energy consumption, particularly diesel fuel, remains a significant operational input.

To reduce fuel consumption, Bathurst has introduced Esso Diesel Efficient fuel at the Ngakawau coal loadout facility. Esso Diesel Efficient increases fuel economy by 2% versus unadditized diesel. The introduction of Esso Diesel Efficient Fuel at Ngakawau and the continued use of this fuel across the BT Mining sites has resulted in 652,390 litres less diesel used, compared with standard diesel during FY2024, and a corresponding reduction in annual $CO_2e$ emissions of 1,769 tonnes.

Bathurst's procurement team undertook an assessment of its mine fleet in FY2024 and identified machinery changes that would improve efficiency and save on fuel. One example includes replacing a R994 excavator with a new PC2000-11R excavator, which results in significant fuel savings. The R994 uses around 178 litres/hr, while the new PC2000-11R uses only 111 litres/hr. This reduces annual fuel use and $CO_2$ emissions by approximately 201,000 litres of diesel and 545 $CO_2e$ tonnes of emissions for one piece of equipment. Bathurst is working with an equipment supplier to improve the sustainability of its fleet across all operations.

Bathurst has also completed a review following 12 months of operating two new Sandvik New Zealand Leopart DI650i drills at the Stockton mine. The previous drills used 90 litres of diesel per hour, while the Sandvik drills operate at 65 litres per hour, reducing emissions by more than 67 kilograms of $CO_2e$ every hour of operation, reducing Stockton's carbon footprint.

# 4.0 Greenhouse Gas Emissions

Bathurst's greenhouse gas ("GHG") emissions stem from three key sources:

- Diesel to extract coal at the mine sites, as well as freight to customers;
- Electricity for coal processing, water treatment plants and mine management systems;
- Coal seams produce small amounts of fugitive emissions (e.g. methane), which are released into the air during mining.

Reported (BRL 2024) Scope 1 and Scope 2 emissions at Stockton for FY2023 and FY2024 are as follows:

*Table 1: Stockton Scope 1 and Scope 2 emissions (BRL 2024)*

| Site: | FY24 Scope 1 emissions ($t/CO_2e$) | FY23 Scope 1 emissions ($t/CO_2e$) | FY24 Scope 2 emissions ($t/CO_2e$) | FY23 Scope 2 emissions ($t/CO_2e$) |
|---|---|---|---|---|
| Stockton | 56,277 | 48,734 | 662 | 703 |

Scope 1 direct emissions are direct GHG emissions from sources owned or controlled by Bathurst, and relate to fuel consumption, blast emissions and gas emissions from transformers, along with fugitive emissions from coal production. Scope 2 emissions relate to indirect GHG emissions from the generation of purchased energy that the organisation uses. Scope 2 emissions from electricity use are significantly lower, because more than 80% of New Zealand's national grid generation is from renewable sources like hydroelectricity and wind.

An estimate of the annual scope for the project was undertaken by consultants PDP.

Details are included in the Greenhouse Gas Assessment Report (PDP 2026). The estimated scope 1 and 2 GHG emissions ($tCO_2$-e) are summarised as totals by area in Table 2:

*Table 2: Summary of Total GHG Emissions (TCO2-e) by Project sub-area – 2028-2042 (source PDP 2026)*

| Area | Total GHG Emissions ($TCO_2$-e) |
|---|---|
| Escarpment Extension (ESE) | 791,222 |
| Mount Frederick South (MFS) | 145,536 |
| Stockton (STE) | 74,826 |
| Upper Waimangaroa Haulroad (UWHR) | 62,593 |
| Other (diesel support and equipment relocation) | 157,009 |

# 5.0 Monitoring and Reporting

Environmental monitoring and reporting are an integral part of Bathurst's operations. Specialist environmental staff are employed, and there is an emphasis on making all staff aware of their environmental obligations through inductions and ongoing training.

Bathurst's reporting of Scope 1 and 2 emissions is consistent with Global Reporting Initiative (GRI) guidelines. In accordance with GRI, Bathurst have reported carbon dioxide in its GHG emissions calculations as $CO_2e$. Bathurst also accounts for gas emissions from electrical transformers and use of explosives.

# 6.0 Emissions Trading Scheme

BRL are continuing to make improvements, implementing more robust monitoring and reporting mechanisms will ensure transparency and accountability in achieving emission reduction goals.

All coal producers, including Bathurst, are mandatory participants in the New Zealand Emissions Trading Scheme ("**ETS**"). Under the ETS, Bathurst is required to remit emission units (also referred to as 'carbon credits' or 'New Zealand Units' (NZU)) to the Government on an annual basis.

Accordingly, Bathurst participates in the New Zealand ETS, purchasing emission units which are then surrendered to the New Zealand Government. The number of units are required to be remitted relates to emissions that result directly from the mining activities and the emissions from the burning of Bathurst's coal products in New Zealand.

In 2025 Bathurst committed to registering 405 hectares (ha) of rehabilitation as permanent forestland at Stockton Mine earning 'carbon credits' and reducing its emissions unit obligations.

# 7.0 Emissions Reductions Opportunities

Bathurst is committed to an Emissions Reduction Strategy (ERS) that considers the opportunities to reduce operational emissions for the Project. The aim being to assess solutions that will both increase, resiliency to climate change hazards and reduce, emissions that cause climate change.

The major emissions sources for the operation of the Project are from extraction transport and processing, due to the use fossil fuel, and from coal seam gas.

Consideration of emissions reduction opportunities and favourable design factors for the Project are outlined below.

## 7.1 Investment in new lower (or zero emission equipment)

We continue to identify other ways we can play a part in being a solution to the challenge of climate change, including working with others to maximise our collective effort. A significant proportion of our mining fleet is supplied by Caterpillar Inc. In 2024, BRL signed up to participate in Caterpillar Inc's Pathways to Sustainability programme. The Caterpillar Pathway to Sustainability Workstream is a comprehensive programme designed to support mining, quarry, and aggregate industry customers in their energy transition journeys. This four-year programme will provide Bathurst with holistic learning opportunities, energy transition project advisement and additional benefits related to sustainable product access.

The programme focuses on six strategic areas: strategy, people, product, process, technology, and infrastructure. The emphasis of the programme is on understanding each participating company's sustainability objectives. Providing participants with information and tools that will help them understand where they are on their own unique journeys and where energy transition strategies may need to be customised to meet their unique needs and environments. By leveraging technology, reducing machine lifecycle waste, and implementing fleet-bridging strategies, the program aligns with BRL's Sustainability Goals to significantly reduce site emissions. Caterpillar workstreams categories to consider include:

**Fuel Source Innovations**

- Hydrogen Fuel: Research and development are ongoing to integrate hydrogen as a viable fuel source for mining equipment. It was noted that the volumes, transportation, and storage issues around hydrogen have made it prohibitive under current technology.
- Liquid Natural Gas (LNG): Caterpillar has explored the use of LNG to power mining vehicles, offering a cleaner alternative to diesel with lower emissions but again that the volumes, transportation, and storage issues around LNG have made it prohibitive under current technology.
- Biofuels – some carbon emissions reduced during manufacturing, but no decrease in greenhouse gases.

**Modular designs**

- Equipment and Machines are designed with modular components that can be easily upgraded or replaced as technology advances. This approach ensures that machines remain relevant and efficient over a longer lifespan.

**Electrification, Hybrid and Flexible Equipment or Power Options**

Trials for energy emission reducing equipment including hybrid models that can switch between battery/mains power and conventional fuel sources allows for flexibility in various job site conditions.

**Adoption of Renewable Energy Sources**

- Potential for increased use of renewable energy sources such as solar, wind, and hydroelectric power for their operations to meet targets set by Government.
- Electrification of Equipment Transitioning from diesel-powered equipment to electric or hybrid alternatives for reducing direct $CO_2$ emissions.
- Trial of Emission Reducing equipment – such as Hydrogen fuelled pumps and lighting sets as they become available.

**Collaboration Across Industries**

Collaboration between mining companies, equipment manufacturers, and technology providers is essential for developing integrated solutions.

BRL is participating in Tyrewise programme and efficiency initiatives:

- Tyre life is extended significantly under Global Tyre Solutions (GTS) management, who specialises in providing world standard Off The Road (OTR) tyre services for the heavy industry sector. With GTS management, with large haulage tyres typically reaching 7,500–10,500 hours avg, compared to 4,000–4,500 hours avg at unmanaged sites.
- This improvement results in fewer tyres consumed per machine, reducing both capital and operational expenditure.
- Each earthmover tyre weighs 1.5 to 3 tonnes — so reducing consumption yields significant $CO_2$ and raw material savings.

- Correct inflation pressure is maintained to reduce rolling resistance, improve fuel efficiency, and lower emissions.
- VBOX™ data logger analysis and compound-specific product selection ensure tyres are matched to site-specific loads, speeds, and temperatures for optimal performance.
- Onsite repair and proactive maintenance reduce premature removals and help achieve full casing potential.
- GTS is a partner of Tyrewise, New Zealand's government-backed tyre stewardship scheme, ensuring 100% responsible recycling of end-of-life tyres.
- The combined effect of longer service life, fewer failures, and reduced fuel burn supports lower carbon output, reduced downtime, and a more sustainable operation overall.

# 8.0 Proposed Project Mitigation Measures and Positive Features

Table 3, Table 4 and Table 5 below list project mitigation measures by activity taken to either reduce GHGs, and maintain or increase carbon sinks, we note that these aspects are not mutually exclusive but go together for overall consideration of climate change aspects for the project.

*Table 3: Proposed project positive features – Project footprint*

| To Limit the Project Footprint and Project Area the Project Has Been Designed To: | Mitigation Measure to Reduce GHGs | Mitigation Measure to Increase Carbon Sinks |
|---|---|---|
| Cluster new ESE project components, including the open pit, stockpiles for ROM coal, water treatment ponds, and ancillary facilities such as the Maintenance Facility, and Administration Building along existing access tracks. | YES | YES |
| Align linear Project features (such as powerlines, roads, water distribution) into a common right-of- way (ROW);<br>• Benefit of UWHR access corridor - Potential for third party to run a fibre internet cable upgrade/resilience for Stockton and any residents down the line<br>At cessation of coal haulage operations, it is proposed the UWHR access corridor reverts to a combination of recreational access along with ongoing Transpower access through to the point where the Mackley Track diverges.<br>• As Transpower will require intermittent and ongoing access with heavier vehicles, it is proposed that the road from Burnett's Face through to the point where the Mackley Access Track diverges be maintained in its full constructed geometry (8.6m running surface).<br>• The remaining sections in the North beyond the Mackley Track, and in the south between Escarpment and Burnett's Face present opportunity for public recreational amenity and | | YES |

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|---|---|---|
| provide the basis for valuable loop circuits accessing remote back country these could be -reduced to a single lane light vehicle track or biking track with the road shoulders reprofiled and planted in appropriate native vegetation.<br>• Public amenity may range from bicycle and pedestrian access though to 4WD. The desired or targeted end use however is yet to be finalised through stakeholder consultation and can be easily accommodated by the proposed approach to repurposing of the UWHR profile. | | |
| Use existing Coal Processing and Transport Infrastructure:<br>• Features placed within existing footprints to limit the clearing of vegetation.<br>• Utilising the existing plant and infrastructure at Stockton (wash plant and aerial ropeway) and Ngakawau (rail loadout) will avoid the embodied carbon associated with the construction of a new CHPP, stockpile area and rail loadout if were to be established in an entirely new location (a 2010 feasibility study located purpose built for ESE on coastal strip).<br>• Also delays the end-of-life emissions associated with decommissioning the existing equipment and plant. | | YES |
| Minimise the length of haul roads, access roads, and where possible is a Mine Engineering design objective as reduces fuel, road maintenance, rehabilitation liability and total number of trucks required, hence diesel burnt per tonne, use or improve existing roads where practical;<br>Alternatives for the coal haulage to the Stockton CHPP from ESE considered the existing public road network. There were several reasons including safety why the public not selected as main haul route, considering greenhouse gas emission the UWHR is clearly best option:<br>• Coal haul from Esc to CHPP via public road - 41km (deltaZ 820m climb from sea level)<br>• Coal haul to Ngakauwa 26km (deltaZ -640m down)<br>• Coal haul to CHPP via UWHR 19km (deltaZ 181m climb) | YES | YES |
| • Limit the UWHR Access Corridor to a single lane for rigid mining trucks (allow movement between Stockton and ESE but wide enough for safe passing of road coal haulers), utilises existing road alignments where practical. The footprint of the private haul road is materially reduced due to the smaller width of the road train units when compared with heavy mine haulage equipment.<br>• Limit the MFS Access Corridor to a single lane width up to edge of active mine area. Dual lane required for Health and Safety reasons in active pits. | YES | YES |
| ESE requires surface water attenuation (ponds or sumps) in order capture and treat mine affected surface runoff (in the proposed water treatment plant). This is a potential opportunity to supply a more consistent water supply to the Kaiwateri Power Station. An Initial assessment was completed by BRL in October 2025 | YES | |

| | | |
|---|---|---|
| inputs and assumptions were:<br>• Small weir/dam directs the water into the pipe<br>• The pipe has continuously fall with no climb anywhere along the route.<br>• Pipe flow is fully dependent on the Whareatea flow at the intake.<br>The assessment presented that there is an opportunity to improve the water supply especially through summer months. Overall result showed that the additional water supply from ESE project can increase consistency by 25% - assuming that the full pipe flow is achieved about 32% of the year. | | |
| Bathurst initiated trials to replace Calcium Carbonate (Limestone) CaCO with Magnesium Oxide MgO to reduce $CO_2$ generated from lime based AMD water treatment systems.<br>Bathurst have initiated trials to use MgO for pH adjustment of AMD, as it provides potential to reduce pumping power requirements and sludge handling costs.<br>BRL are monitoring potential use of MgO from calcining serpentine using biomass fuel relatively close to the ESE mine site which produces no CO2 from the rock, compared to tonne Co2 for every tonne of limestone (CaCO3) burned to make a tonne of CaO. This might provide longer term GHG emissions/reduction.<br>As a byproduct of the MgO production, magnetite could/would also be produced, and could become a long term replacement for magnetite used in the Stockton CHPP, which is currently sourced from Tasmania, saving significant transport energy costs and GHG emissions. | YES | |
| Bathurst have worked with a supplier to develop alternative supplies of CaO from the Nelson area, to supplement supplies from Dunback in North Otago. The Nelson supplier uses biomass rather than coal to calcine the limestone, and it is a ~500km round trip, rather than a 1280km round trip to make. | | |
| Initial development activities for ESE Water Treatment Plant – reduce embodied emissions by reuse of the some of the major components from existing mothballed Stockton Black Water Treatment Plant.<br>During production MFS & ESE WTPs – are modular designs to allows scaling as required, efficient use of materials, power and reagents. | YES | |
| Place reclamation material stockpiles if can't be placed directly on a completed landform wherever practical (surface soil and veg slash, woody debris) within development areas such as the open pit, backfill and haul roads to avoid additional disturbance. | | YES |

| | | |
|---|---|---|
| Backfill of overburden rock (non-coal) back filled into the open pit voids, reduces the new disturbance footprint of expit overburden Landforms (ELF)<br>Escarpment Extension a total of 87.2M bcm of non-coal material placed in pit voids out of 149.1M bcm.<br>Mount Frederick South a total of 14.7M bcm of non-coal material placed in pit voids out of a total expected volume of 16.1M bcm. | | YES |

*Table 4: Proposed project positive features-Reclamation Measures*

| Reclamation Measures | Mitigation Measure to Reduce GHGs | Mitigation Measure to Increase Carbon Sinks |
|---|---|---|
| **The following reclamation measures have been incorporated into the mine design:** | | |
| Use progressive reclamation techniques to limit the amount of disturbance at any given time by sequencing the open pit and stockpiles to the extent feasible, backfilling of open pit where possible, directly placing reclamation materials, and placing excavated materials on previously disturbed areas. | | YES |
| Salvage reclamation materials (surface soil, woody debris, and overburden), for later use in accordance with the Reclamation and Closure Plan. | | YES |
| Vegetation direct transfer (VDT) where possible. | YES | YES |
| Expansion of local nursery to increase from 50,000 to 150,000 plants (move from previous Christchurch to Westport to grow plants). | YES | |

*Table 5: Proposed project positive features-Project Implementation*

| Project Implementation | Mitigation Measure to Reduce GHGs | Mitigation Measure to Increase Carbon Sinks |
|---|---|---|
| The following measures have been incorporated into the mine development: | | |
| Initially diesel generators will supply power to the new ESE infrastructure, these are planned to be replaced with mains reticulated power in ~2030 once a new substation is constructed at Waimangaora and powerlines extended to mine site infrastructure | | YES |
| Where practicable portacoms will be relocated from Stockton to ESE and MFS for amenities buildings, reducing the number of new buildings required, and transport costs of those buildings | | |

| | | |
|---|---|---|
| Consistent with current Stockton operations, use vans and buses to transport employees from Westport to the mine sites and then straight to crib huts instead of transfer to admin area then out to workface. | YES | |

## 8.1 Estimation of fugitive coal seam methane emissions

Coal is a microporous and unconventional reservoir for natural gas. Absorbed gas (mainly methane) can remain in coal until disturbed by mining. Coal gas storage of different coal can vary depending on formation, depth, rank and quality.

During a recent drilling programme in December 2025 BRL drilled and undertook specialised gas testing for fugitive gas (using an independent contractor) on one hole in the MFS sub area (DC40). Accordingly, using conversion factors laid out by the International Climate Change Protocols (ICCP), all the measured $tCO_2e/t$ were substantially below the government figure, indicating that mining from Deep Creek will emit much lower fugitive emissions than assumed in the regulations (averaged Deep Creek 0.0062 $tCO_2e/t$ compared to the government nominal figure of 0.514 $tCO_2e/t$).

Details on the drilling and gas testing programme and analysis are found in the PDP Buller Plateaux Continuation Project Greenhouse Gas Assessment Report 2026 (PDP 2026, Appendix D). This indicates that further need to quantity gas content in coal from across the Buller Project resource in an understanding and estimating fugitive coal emissions.

BRL are planning further infill resource and geotechnical drilling programs that include gas sampling and testing (using an independent contractor) in order to improve the precision of estimation fugitive emissions within the BPCP coal seams. The programme will require specialist testing equipment and experienced external staff with the objective of developing a Unique Emission Factor for the Buller Plateaux coals.

# 9.0 References

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