7. MANAGEMENT AND MONITORING OF ACTUAL AND POTENTIAL ENVIRONMENTAL EFFECTS

7.1 APPROACH TAKEN

Chapter A.6 – Assessment of Environmental Effects of this substantive application assesses the actual and potential effects of the BPCP, drawing on specialist technical assessments prepared by independent experts (including peer reviews) and informed by engagement with mana whenua regarding cultural values. Those assessments identify the nature and scale of potential effects and recommend measures to avoid, remedy or mitigate, or otherwise manage adverse effects where practicable.

To meet the FTAA expectation for a clear, integrated, and enforceable management framework, this Management and Monitoring section brings together those topic-specific effects management recommendations. It outlines the overall approach to effects management across all environmental effects of the BPCP, providing certainty as to how recommended measures will be implemented, performance verified over time, and further responses triggered where necessary throughout construction, operation, closure and rehabilitation.

The overall approach to managing environmental effects follows a cascading effects management hierarchy, consistent with national, regional, and district planning frameworks and recognised best practice for large-scale mining projects.

This approach is reflected throughout the Project's design, assessment, and proposed management framework, including refinements to mine layouts, infrastructure alignments (such as the UWHR), construction methodologies, and rehabilitation strategies.

In relation to ecology in particular, the technical assessments acknowledge that, notwithstanding robust avoidance, mitigation and rehabilitation measures, residual ecological effects will remain for some ecological values. The REP and other positive ecological responses address those residual effects and are designed to support long-term biodiversity outcomes. Bathurst therefore proposes a comprehensive suite of measures to manage adverse effects on terrestrial, wetland, and freshwater ecological values within and beyond the Project footprint, including within the pest-exclusion fenced areas.

Bathurst's expert advisors' recommendations have informed the development of a robust and integrated suite of proposed consent conditions, provided in **Part E** of this application. These conditions, and the management measures that underpin them, have also been shaped by engagement with mana whenua, DOC, WCRC and BDC. This engagement has

ensured that the proposed management framework is appropriate, proportionate and capable of effectively managing Project effects.

Bathurst will implement the Project in accordance with those conditions, supplemented by management plans (provided as a final draft and included in **Part G** of this application), to ensure effective management measures are applied consistently throughout construction, operation, rehabilitation and closure.

Overall, Bathurst and its technical expert advisers consider that the BPCP can be undertaken in a manner that appropriately manages unavoidable adverse environmental effects. Where residual effects remain – particularly for ecological values and water-related matters – they will be addressed through a structured and monitored programme designed, where possible, to deliver long-term benefits that outweigh impacts, while also supporting the purpose of the FTAA to enable projects of regional and national significance.

7.2 MEASURES PROPOSED

The key measures proposed by Bathurst to manage identified effects are set out in **Table 7-2** below. These measures apply the effects management hierarchy and relate to actual and potential effects remaining after initial (and ongoing) avoidance and minimisation have been incorporated into Project design (e.g. the proposed alignment of the UWHR). Collectively, they comprise an integrated management framework addressing the full range of potential and actual adverse effects arising from the Project.

Key measures proposed by Bathurst include, but are not limited to:

- Implementation of a comprehensive water management system to capture, reuse and appropriately treat mine-impacted water (including treatment post-closure where required);
- Preparation and implementation of detailed water management plans covering construction, operation and closure phases of the Project;
- Adoption of a coordinated suite of ecological management plans, including plans addressing avifauna, lizards, terrestrial invertebrates, pest plants and mammalian pests;
- Utilisation of erosion and sediment control measures during site establishment and operation;
- Implementation of adaptive erosion and sediment control measures based on clean-water diversion, staged earthworks, sediment retention devices, rapid stabilisation of exposed areas, and trigger-based monitoring and response during rainfall events;

- Design and construction of ELFs to limit sulphide mineral oxidation and AMD risks;
- Risk-based material classification, tracking and placement controls to ensure acid-forming materials are preferentially encapsulated within ELFs, and lower-risk materials are reserved for cover systems, drainage interfaces and other sensitive locations;
- Progressive rehabilitation and ELF design to avoid, remedy or mitigate adverse landscape and visual effects;
- Limits and controls on noise, vibration and light spill;
- Traffic management measures to minimise adverse effects on public roads and users;
- Measures to minimise dust, particulate and gaseous emissions to protect amenity and receiving environments;
- Protection of listed historic heritage and archaeological sites where practicable, and recording and investigation of sites affected (in accordance with the HHMP);
- Implementation of archaeological authority requirements, accidental discovery protocols, heritage recording and monitoring, and a structured heritage enhancement and stakeholder engagement framework through the HHMP; and
- A comprehensive rehabilitation and closure framework, secured through rehabilitation bonds.

7.2.1 Rehabilitation

Rehabilitation is embedded into the BPCP from the outset as a core design and operational requirement with clear, measurable outcomes. This approach is based on Bathurst's ongoing rehabilitation work at Stockton, which in turn has been informed by many years of developing and refining methods required to achieve successful outcomes in demanding West Coast conditions.

Mine layouts, sequencing, and infrastructure placement have been developed alongside rehabilitation objectives so that final landforms, drainage patterns, and post-mining land uses are considered simultaneously with resource extraction. Progressive rehabilitation is required to commence as soon as practicable following disturbance, ensuring the total area of exposed land at any one time is kept as low as is practicable and cumulative effects minimised.

A key component of the Project's rehabilitation approach is prioritising VDT wherever practicable. The rehabilitation framework includes a target that at least 15% of the total new rehabilitated area within the Project Area will be rehabilitated using VDT. VDT transfers intact soils and vegetation communities directly from mined areas to rehabilitation areas,

preserving soil structure, seed banks, micro-habitats, and low-mobility fauna, and substantially accelerating ecological recovery compared with conventional rehabilitation methods. Where VDT is not feasible due to engineering or scheduling constraints, rehabilitation will be undertaken using direct soil transfer, planting and habitat enhancement techniques designed to establish stable, indigenous ecosystems over time.

Rehabilitation requirements are embedded within annual mine planning and aligned with the Rehabilitation Management Plan ("**RMP**"), ensuring that operational decisions remain consistently linked to closure outcomes throughout the life of the Project. Rehabilitation is intended to deliver enduring outcomes, including the re-establishment of self-sustaining ecosystems, integration with the REP (as discussed further below), reinstatement of recreational access where appropriate, and the creation of positive long-term environmental and community legacies.

At a strategic level, the RMP frames rehabilitation as one of the Project's principal long-term effects management tools, not simply an end-of-mine activity. It is intended to create safe and stable post-mining landforms that support self-sustaining indigenous ecosystems, reduce AMD generation and erosion risk, restore ecological connectivity, and blend more sympathetically with the surrounding Buller Plateaux landscape. The plan identifies a suite of target post-mining ecosystem types - including forest, shrubland, pākihi, wetlands, tarns and rockfield habitats and links those outcomes to landform slope, drainage, substrate depth and rehabilitation method so that final vegetation patterns respond to the same ecological drivers that shape the natural plateaux environment.

The RMP also introduces measurable closure criteria and a progressive works programme to ensure that rehabilitation performance can be demonstrated over time rather than assumed. These criteria address matters such as indigenous plant cover, species richness, weed control, fauna habitat attributes, wetland extent and the reinstatement of stream length and habitat complexity. They are supported by annual planning, rehabilitation resource tracking, and biodiversity outcome monitoring, enabling methods to be adapted where outcomes are not tracking as intended. Completion of rehabilitation will be assessed against rehabilitation outcomes and completion criteria contained within the RMP and associated conditions (provided in **Part E**). In this way, rehabilitation performs a dual role in the Project: it progressively reduces operational and closure risks, while also providing a pathway for the re-establishment of indigenous ecosystems and ecological processes over time. While rehabilitated areas may not fully replicate the characteristics of the ecosystems they replace, the objective is to achieve stable, functional and self-sustaining outcomes that perform well in the long term.

7.2.2 Residual Effects Package

As outlined in **Chapter A.6 – Assessment of Environmental Effects**, any residual ecological effects of the BPCP that remain after applying the effects management hierarchy will be addressed through the comprehensive REP. This package is deliberately designed to address those residual effects by delivering landscape-scale biodiversity enhancement, including pest exclusion fenced areas, intensive and extensive predator and weed control, and outcome-focused long-term monitoring, supported by adaptive management.

Overall, the REP covers approximately 26,259 ha[30] and is structured as a multi-tiered system that combines predator-free refuges (pest exclusion areas), intensive pest suppression zones, targeted weed management, and landscape-scale buffering to reduce reinvasion pressure and extend ecological benefits across the wider receiving environment (Alliance Ecology, 2026a). The key components are summarised below.

- Pest exclusion fenced areas (~911 ha): Four fenced areas are proposed on the Buller Plateaux - Denniston North (47.3 ha), Coalbrookdale (154.4 ha), Mt Augustus (14.6 ha), and Whirlwind Rise (694.9 ha). These sanctuaries are intended to be maintained long term. Within the fences, the objective is to achieve predator- and ungulate-free conditions, alongside weka removal/exclusion and ecological weed control, to create high-certainty refugia for predator-sensitive taxa and secure source populations for future dispersal and recovery. The pest exclusion areas, and obligations for actions within them, will be maintained for 50 years (from the date of the construction of the last area).
- Blackburn–Pakihi intensive ground-control area (~1,505 ha): This area will receive year-round, multi-species ground-based suppression (trap and bait networks), supported by aerial control and ungulate management. The purpose is to have pest knockdowns at sufficiently regular intervals to limit rebound between cycles, and thus to protect a responsive mosaic of lowland forest and pākihi wetland/shrubland habitats that support threatened and at-risk fauna.
- Weed management (~9,431 ha total, including ~6,713 ha treated as compensation): Weed control is proposed across the Weed Management Area, including ~6,713 ha within compensation sites and ~2,718 ha within the consenting footprint to support rehabilitation. The programme targets priority environmental weeds (including gorse, broom, wilding pine, heath rush, Spanish heath and others), which will support the maintenance or increase in indigenous dominance and reduce the risk of ecosystem

[30] The areal extent of pest or weed control includes approximately 1,363 ha of mammalian pest control undertaken for ecological rehabilitation within the existing Stockton Mine, which is currently being undertaken.

state change in vulnerable open habitats and disturbed margins. It also includes measurable objectives such as progressive reductions and eradication/surveillance targets, including "zero density" goals for specified categories by defined dates.

- Wider managed "halo" landscape (~25,000 ha): A broad surrounding landscape will be managed using a baseline three-year aerial 1080 cycle, with flexibility for mast-responsive operations, supported by ongoing ground-based control (notably stoat control) to keep predator pressure low between aerial events. This halo reduces reinvasion pressure on core sites and expands benefits to wider forest and catchment habitats, including across a landscape intended to support kiwi recruitment and forest bird recovery.

The overarching intent is to shift ecological trajectories away from ongoing decline driven by introduced predators/browsers and weeds, and toward stabilisation and recovery, while maintaining viable indigenous populations so that rehabilitated areas can be recolonised over time.

Baseline monitoring on the Buller Plateaux indicates rodent and mustelid activity is present and widespread, and often above thresholds typically associated with biodiversity recovery. Without intensified control, predator pressure is expected to continue to constrain recovery and drive declines in sensitive taxa. In that counterfactual scenario, periodic mast-driven irruptions would be expected to exacerbate impacts, increasing extinction risk for predator-sensitive species over the medium to long term, alongside ongoing weed spread that can progressively degrade vulnerable open habitats.

By contrast, the scale and intensity of the REP is expected to deliver net positive outcomes for many native birds (such as roroa) and some invertebrates (particularly the *Powelliphanta* snail species) by improving survival and recruitment sufficiently to support population growth, even where habitat extent is reduced in the short- to medium-term. Predator-free sanctuaries provide the highest-confidence gains for predator-sensitive taxa, because they remove predation pressure entirely within secured refuges and maintain those conditions over the long term.

These measures will also deliver indirect but significant benefits for freshwater systems, also by improving catchment condition, reducing erosion pressure and enhancing ecosystem resilience. Importantly, the scale and longevity of these measures mean they generate ecological and water-quality benefits that would not occur under the base-case scenario.

In addition to the biodiversity enhancement and residual effects measures proposed as part of the BPCP, Bathurst remains committed to implementing the remaining biodiversity

components of the Escarpment Mine Compensation Package in accordance with the existing DOC Access Arrangement. Bathurst will continue to make compensation payments to DOC in accordance with the agreed payment schedule, with DOC responsible for delivery of the DPPA, DBEA and HBEA initiatives. All heritage-related compensation commitments associated with the Escarpment Mine have already been completed.

Continuing these existing biodiversity commitments alongside the proposed REP means some overlap occurs between historical compensation measures and the biodiversity outcomes proposed for the BPCP. This includes approximately 57.7 ha of the original 107 ha DOC AA compensation footprint that is proposed to be disturbed as part of the BPCP, as well as the 4,990 ha DBEA pest and predator control area, which is wholly contained within the REP's broader landscape-scale pest management area.

Bathurst intends to work with DOC, WCRC and BDC to determine an appropriate approach to these areas of overlap. The objective will be to recognise existing commitments, avoid unnecessary duplication of management actions, and ensure that available resources are directed toward achieving the greatest practicable biodiversity outcomes across the wider Buller Plateaux landscape.

7.2.3 Water Management

Water management is a central element of the BPCP and has been a defining consideration in both Project design and the assessments undertaken. The Project has been developed within a complex hydrological and geochemical setting that includes both long-modified mining environments and near-natural headwater catchments. In response, Bathurst and its team of experts have adopted a comprehensive, risk-based and adaptive water-management framework that integrates prevention, mitigation, rehabilitation and compensation across all phases of mining.

A fundamental feature of the approach is the clear distinction between the existing Stockton Sub-Area and other BPCP Sub-Areas (MFS, ESE and UWHR). At Stockton, surface water and groundwater systems have been substantially modified by historic underground and opencast mining, and AMD represents an entrenched legacy issue. In contrast, the extension areas are characterised by largely natural hydrological regimes and high-value receiving environments, though with some existing contamination from historic mining. This distinction has informed the application of two complementary strategies: a recovery- and betterment-focused approach at Stockton and a prevention- and protection-focused approach in the extension areas.

Throughout Project development, the effects management hierarchy has been rigorously applied. Avoidance has been prioritised through iterative mine design, staging and

infrastructure siting to reduce unnecessary disturbance to waterways and catchments. Where avoidance is not practicable, effects are minimised through design-led solutions, including clean-water diversions, careful material handling and staged development. Mitigation and remediation measures are then applied to manage remaining effects, with residual impacts addressed through a comprehensive residual effects and enhancement framework.

A key component of the Project's water-management strategy is the strict separation of clean water and mine impacted water. Across all Project areas, upslope runoff (i.e., clean water) is intercepted and diverted around disturbed areas wherever practicable, often utilising designed clean-water drains, thereby maintaining natural flow pathways and reducing the overall volume of water requiring management or treatment. Water that does come into contact with disturbed materials (i.e. mine impacted water) is captured within a controlled network of sumps, drains and storage facilities to allow for treatment prior to discharge to the receiving environment.

The primary water management issues arise from the potential for AMD and sediment to contaminate water. AMD management has been addressed primarily through source control, particularly in the extension areas where prevention is the primary focus. Potentially acid-forming materials are selectively handled and placed within ELFs designed to limit oxygen and water ingress, thereby reducing the generation of AMD at source. These landforms are constructed progressively and capped in accordance with conservative design criteria. Where AMD is generated, treatment systems are implemented to neutralise acidity and remove dissolved metals before discharge.

The AMD Engineered Landform Management Plan further strengthens this approach by confirming that ELFs are not simply storage areas for overburden but engineered source-control landforms designed such that the final landform will be geochemically and geotechnically stable. Their design incorporates risk-based material classification, selective placement and encapsulation of PAF and HAF materials, low-sulfur outer shells, underdrainage and seepage collection systems, clean-water diversion, cover systems and progressive rehabilitation intended to limit oxygen ingress and net percolation over the long term.

The Project integrates both active and passive water treatment systems over its life. During construction and operations for the extension areas, active treatment plants manage mine impacted water and sediment prior to discharge. As mining progresses toward closure, treatment progressively transitions towards passive systems such as mussel shell reactors and polishing ponds. The transition from active to passive treatment is performance-based and supported by monitoring and compliance requirements, rather than being linked solely

to the cessation of mining activities. This staged approach ensures continuity of water quality management while supporting long-term resilience and reducing reliance on energy-intensive systems. At Stockton, continued operation of the existing AMD treatment infrastructure, coupled with new water treatment infrastructure proposed for the Millerton area, will enable the ongoing management and progressive improvement of legacy AMD-affected waterways, avoiding deterioration that would otherwise occur under the base-case scenario. Those existing and ongoing Stockton-specific management arrangements are addressed through the Stockton Mine AMD Environmental Management Plan and related Stockton water management planning, which provide the overarching framework for AMD treatment, monitoring, adaptive management within the Stockton Sub-Area.

Given the exceptionally high rainfall and steep terrain of the Buller Plateaux, sediment management has been a key focus of Project design and assessment. Construction-phase erosion and sediment controls are implemented to manage short-term risks associated with vegetation clearance and earthworks, while permanent treatment systems address operational-phase sediment loads. Discharge structures are designed to regulate timing and flow rates so that treated water is released in a manner consistent with natural hydrological variability. Infrastructure has been sized to accommodate high flow rainfall events and incorporates allowances for projected climate-change impacts.

That approach is reinforced by the Erosion and Sediment Control Plan for Land-Disturbance Activities, which adopts a deliberately conservative design basis for the high-rainfall West Coast environment and applies adaptive management to land disturbance, including earthworks, road construction and associated infrastructure areas. The plan emphasises minimising exposed areas, staging works to reduce open-earth footprints, separating clean water from sediment-laden runoff, deploying sediment retention ponds and other treatment devices, and rapidly stabilising exposed surfaces through topsoiling, hydroseeding, erosion-control matting, direct transfer of slash or vegetation, as appropriate. It also provides for site-specific erosion and sediment control plans, hold points, as-built verification, and pre- and post-rainfall inspections, so that controls can be refined quickly when monitoring indicates performance is below expectations.

Protection of aquatic ecosystems is addressed through an integrated framework that links hydrology, water quality and ecology. Stream diversions and culverts are designed to minimise habitat disruption, maintain channel stability, and provide passage for aquatic fauna (specifically kōura) where practicable. In the extension areas, site-specific water quality values and compliance limits have been developed using a weight-of-evidence ecotoxicological framework that accounts for the naturally acidic, low-ionic-strength nature

of the plateaux streams. These limits, together with defined levels of ecological protection, provide a robust basis for managing discharges and monitoring effects.

At Stockton, the approach to aquatic ecology management is necessarily different, reflecting the long history of mining, the presence of legacy AMD sources, and the fact that a number of receiving environments are already modified or recovering rather than unimpacted. Management is therefore focused not only on avoiding further adverse effects, but also on supporting a long-term recovery or betterment trajectory for aquatic ecosystems affected by historic and contemporary mining. This is achieved through continued active and passive treatment of AMD, controlled management of mine-impacted water, capping and rehabilitation of disturbed materials, and targeted water-quality and ecological monitoring designed to track changes in stream condition over time.

The Stockton framework classifies waterways according to their current and predicted recovery status, including water-quality impacted, recovering and recovered streams. This classification is informed principally by pH and dissolved aluminium, which are key indicators of AMD-related ecological stress in BCM streams, while recognising that naturally acidic conditions mean pH alone is not a complete indicator of ecological health. The monitoring programme is therefore adaptive and evidence-based, with greater emphasis on performance monitoring in impacted or recovering streams, and compliance-based ecological assessment as streams reach recovered status. Ecological monitoring includes macroinvertebrates, fish, periphyton, bryophytes, kōura where present, sediment quality and habitat condition, supported by reference sites to provide context for assessing recovery.

In this way, the Stockton aquatic ecology management framework links water management, AMD treatment, ecological thresholds and long-term water quality and biological monitoring into a single improvement-focused programme. It enables management responses to be refined as water quality improves, or when monitoring indicates that recovery is not tracking as predicted. This approach is intended to support progressive improvement in aquatic ecosystem condition across affected Stockton catchments, including the Ngākawau, Mangatini, St Patrick and Millerton waterways, while also providing a robust basis for demonstrating whether AMD source control, treatment and rehabilitation measures are delivering the anticipated ecological outcomes.

Closure planning has been embedded from the earliest stages of Project development. Progressive rehabilitation during operations reduces disturbance and supports early stabilisation of landforms. At closure, the completion of reshaping and rehabilitation of disturbed areas will be completed to form stable, self-sustaining landforms, with reinstated stream channels, riparian planting and the creation of tarns and lakes where appropriate.

Long-term passive treatment systems and extended monitoring programmes ensure that any residual water-quality risks are effectively managed post-closure and that ecological improvement trajectories are verified and supported.

Implementation of this framework is underpinned through a comprehensive suite of management plans that address construction, operation and closure. All key water (and ecological related) management plans have been prepared by suitably qualified experts, and final draft versions have been submitted with this application to provide certainty and enable conditions to directly require their implementation.

Clear recommendations around ELF construction also provide an important bridge between active operations and closure. In the new mining areas, detailed geochemical characterisation has informed a prevention-focused AMD management strategy based on material classification, selective handling and placement, encapsulation of potentially acid forming materials, engineered drainage controls, and progressive rehabilitation. The ELFs are a central component of this approach and are designed to limit oxygen ingress and water infiltration, thereby reducing sulphide oxidation and AMD generation at source. Their performance will be verified through monitoring of seepage quantity and quality, oxygen ingress, cover-system performance and landform stability, enabling management measures such as lift design, cover materials, alkaline amendment rates, encapsulation practices and drainage controls to be refined where required. At Stockton, where AMD management is focused on managing existing mine-affected environments and ongoing rehabilitation of historically disturbed areas, similar monitoring and adaptive management processes support the continued optimisation of landforms, treatment systems and closure measures. In this way, the ELF framework provides an important link between operational AMD management and closure by supporting both the prevention of future AMD generation in the new mining areas and the long-term stabilisation and rehabilitation of existing disturbed areas.

More specifically, the AMD Water Management Plan adopts a structured framework that distinguishes clean water, mine-impacted water, treated water, closure waterbodies and groundwater, with monitoring, operational controls and performance criteria tailored to each. Across MFS, ESE and UWHR, the framework centres on separating clean and mine-impacted water, containing and treating contact water, managing seepage from ELFs, and transitioning from active treatment during operations to passive treatment systems where appropriate during closure and post-closure. Particular emphasis is placed on minimising AMD generation at source and managing risks through the careful scheduling, placement and encapsulation of higher-risk materials. At Stockton, the same framework operates within a different context, where management is directed towards the ongoing treatment of mine-impacted water, management of legacy AMD sources, sludge handling, rehabilitation

of historic disturbances and progressive improvement of affected waterways where practicable. Across all Project areas, monitoring results will be used to verify performance and inform adaptive management responses. The framework also recognises that, in this high-rainfall environment, controlled bypasses and spill mechanisms may be required during defined high-flow events; these are anticipated, monitored and managed through an effects-based compliance framework. Together, these measures provide an integrated approach that addresses both the prevention of future AMD impacts in the new mining areas and the ongoing management of existing AMD-related effects within the Stockton Sub-Area.

Overall, the BPCP water-management framework is integrated, conservative and proportionate to the scale and sensitivity of the receiving environment. It reflects a thorough understanding of both legacy and potential future effects, and combines prevention, treatment, rehabilitation and residual effects into a coherent strategy. It is also expressly adaptive, applying a Plan–Do–Check–Act approach supported by reference, compliance and performance monitoring so that management can be refined in response to observed conditions. On that basis, the Project provides confidence that actual and potential water-related effects can be avoided, mitigated, or appropriately managed throughout construction, operation, and long-term post-closure.

7.2.4 Management of Effects on People and Places

The BPCP has been developed within a landscape that is not only environmentally complex, but also deeply shaped by more than a century of coal mining, settlement, recreation and community life. The Project therefore engages with heritage and cultural values, recreational use and social networks that are long-established and strongly interconnected. In recognition of this context, the Project has adopted a management framework that does not seek merely to mitigate individual effects in isolation, but instead works to maintain continuity, manage change over time, and protect the social and cultural fabric of West Coast communities.

A central theme across all three domains – heritage, recreation, and social and community values – is that the BPCP represents a continuation and evolution of an existing mining landscape, rather than a sudden or unfamiliar transformation. The Project builds on existing land use, established access arrangements, historic associations and community relationships, while incorporating comprehensive mitigation, residual effects and enhancement measures to address unavoidable effects and ensure long-term positive outcomes.

7.2.4.1 Management of Effects on Historic Heritage Values

The Buller Plateaux is recognised as a nationally significant historic mining landscape, containing a dense concentration of archaeological sites, historic structures, mine workings, transport infrastructure, and settlement remnants associated with late nineteenth and early twentieth-century coal mining. These values are fundamental to the identity of the Denniston and Stockton Plateaux and form part of a broader regional heritage narrative.

The BPCP has been designed with a clear understanding that many historic heritage features are spatially coincident with the coal measures that underpin the Project's viability. As a result, while avoidance has been undertaken wherever practicable through iterative mine planning, some loss or modification of historic features is unavoidable. In this context, the Project's approach to heritage management has moved beyond simple avoidance and mitigation and instead applies a comprehensive framework of documentation, investigation, interpretation, offsetting, and long-term enhancement.

Detailed historic heritage and archaeological assessments have been undertaken to identify sites and values across all Project areas. These assessments have informed mine design and staging, enabling avoidance or minimisation of effects where practicable. Where direct impacts cannot be avoided, the Project provides for systematic recording, investigation and salvage in accordance with the Heritage New Zealand Pouhere Taonga Act and accepted archaeological practice.

Importantly, the Project recognises that heritage values extend beyond individual sites to encompass the wider mining landscape and its stories. To address cumulative and residual effects, Bathurst has committed to establishing a Historic Heritage Enhancement Fund, which will support conservation, interpretation, access, and education initiatives across the wider Denniston and Stockton heritage landscape. This includes support for oral history projects, improved interpretation of historic mine sites, enhanced public access to heritage areas post-mining, and collaboration with local museums, DOC, iwi, heritage groups and councils. Through this approach, the Project seeks not only to manage adverse effects, but to strengthen understanding, accessibility and appreciation of heritage values over the long term.

That framework is operationalised through the Historic Heritage Management Plan, which applies a project-wide approach to identification, avoidance where practicable, pre-construction survey and recording, archaeological monitoring, and site-specific protocols for each Sub-Area. Where pre-1900 archaeological sites may be affected, archaeological authority processes and archaeological management procedures are triggered before works commence. Across all Sub-Areas, the framework also requires baseline recording of features that may be affected, physical protection and exclusion measures for retained sites

near disturbance areas, annual condition monitoring of selected retained heritage features, and clear accidental discovery procedures for archaeological remains, kōiwi tangata, taonga tūturu and non-Māori mining artefacts. The Historic Heritage Enhancement Fund will be supported by an ongoing Heritage Stakeholders Group, providing a mechanism for stakeholder input into heritage enhancement priorities and opportunities throughout the life of the Project.

7.2.4.2 Management of Effects on Cultural Values

Te Rūnanga o Ngāti Waewae have been, and will continue to be, engaged with extensively throughout all stages of the BPCP (as well as through the existing mining operations on the Buller Plateaux). The CIA prepared by Ngāti Waewae identifies the importance of this collaborative, partnership-based approach between Ngāti Waewae and Bathurst to appropriately manage effects on cultural values. This includes maintaining ongoing engagement and providing for Ngāti Waewae participation in governance, advisory, and technical processes, as well as in decision-making on matters of cultural significance. The recommendations emphasise the need to ensure that cultural values are recognised and protected not just during operations, but over the long term, including through Ngāti Waewae involvement in the governance and delivery of biodiversity offset and residual effects measures.

Ngāti Waewae seek active participation in environmental management and monitoring, particularly in relation to water quality, groundwater, and aquatic ecosystem health. This includes providing monitoring reports for review and incorporating cultural indicators such as mauri into monitoring frameworks. The development of cultural health indices and the progressive integration of mātauranga Māori into monitoring, interpretation, and reporting are also key components of the recommended approach.

In relation to rehabilitation and biodiversity management, the recommendations provide for Ngāti Waewae involvement in the design and implementation of rehabilitation works, including incorporation of mātauranga Māori where practicable. This includes the use of indigenous, locally sourced species, effective pest and weed management, and transparency through provision of annual plans, monitoring results, and opportunities for site visits. Ngāti Waewae also seek assurance that offset and residual effects measures will be delivered as proposed, and that they will be kept informed of, and involved in, these activities.

The recommendations in the CIA further include recognition of specific cultural commitments, such as the continued exclusion of Mt William South from development, and the provision of opportunities for Ngāti Waewae whānau to participate in project outcomes where appropriate.

An Accidental Discovery Protocol will be implemented to manage the potential discovery of kōiwi, artefacts, and other sites of cultural significance. This will require works to cease in the vicinity of any discovery, protection of the site, and prompt engagement with Ngāti Waewae and relevant authorities to determine appropriate management. Overall, these measures are intended to ensure a culturally responsive approach to managing effects, with Ngāti Waewae actively involved in environmental stewardship and decision-making.

7.2.4.3 Management of Effects on Recreational Values

The Buller Plateaux is also a valued recreational area, supporting a range of activities including walking, mountain biking, four-wheel driving, hunting, heritage tourism and informal recreation. These activities already, in part, coexist with existing mining operations and, in many cases, are shaped by access controls, safety requirements and staged land use.

The BPCP acknowledges that mining activities will result in localised and temporary disruption to some recreational opportunities, particularly during periods of active mining and infrastructure development. However, the Project has been designed to manage these effects in a staged, transparent and adaptive manner, ensuring that recreational access is retained wherever practicable and reinstated or enhanced over time.

A key element of the Project's recreational management approach is the recognition that effects are largely temporary and spatially limited. While certain routes and areas will require restrictions during active mining for safety reasons, other areas of the Plateau will remain accessible, and alternative routes or locations will remain available. Progressive rehabilitation plays an important role in restoring recreational values, with rehabilitated landforms, tracks and access routes progressively returned to use as mining advances.

To support ongoing engagement and responsive management, the Project proposes establishing a RUG to enable regular communication with recreational users, advocacy groups, and agencies. This forum provides a mechanism to manage access arrangements, address concerns, coordinate temporary closures, and identify opportunities to enhance post-mining recreation. In addition, the Project includes commitments to managed access, reinstatement of routes following mining and rehabilitation, and, where appropriate, support for off-site recreational and tourism opportunities in cases of short-term displacement.

Over the longer term, the Project is expected to deliver net benefits for recreation through the retention and enhancement of access across rehabilitated areas, improved track infrastructure, legacy use of mine roads, and integration of heritage interpretation with recreational experiences. In this way, the BPCP manages recreational effects not simply as

a constraint to be minimised, but as a value to be actively supported through staged planning and long-term land use outcomes.

7.2.4.4 Management of Social and Community Values and Networks

Social and community considerations sit at the heart of the BPCP, reflecting the central role that mining has played, and continues to play, in the social, economic and cultural life of the West Coast. Communities such as Westport, Denniston, Millerton and surrounding settlements have evolved alongside mining activity for more than a century, and the continuation of mining at Stockton and the Buller Plateaux is deeply connected to employment, population stability, community infrastructure and regional resilience.

The Project's social management framework recognises that abrupt cessation of mining would have significant and immediate adverse consequences for households, local businesses, community services and social networks. The base-case scenario for mine closure would result in loss of employment, reduced household income, population decline, and erosion of the social systems that support community well-being. Maintaining continuity of operations through the BPCP, therefore, plays a critical role in sustaining these networks and avoiding social disruption.

Comprehensive social and economic assessments undertaken for the Project demonstrate that the BPCP supports stable employment, income security and workforce continuity, with the majority of employees residing locally and contributing directly to community life. This stability underpins participation in schools, clubs, and volunteer organisations, as well as emergency response capabilities, and supports the viability of key regional services and infrastructure. The Project also contributes to social resilience through ongoing community investment, volunteering, support for emergency management, and material contributions to local initiatives.

The Project places strong emphasis on maintaining its Social Licence to Operate through ongoing engagement, transparency and responsiveness. Engagement is not limited to formal consultation at the application stage, but is embedded as a continuing process throughout construction, operation and closure. This includes engagement with iwi, local authorities, community organisations, recreational users and residents, ensuring that concerns are identified early and managed collaboratively.

Importantly, closure planning and long-term transition form part of the Project's social framework. Early consideration of closure allows communities to plan for the eventual wind-down of mining activities in a managed way, reducing shock effects and supporting a positive legacy. Continued engagement during closure phases ensures that rehabilitation outcomes, land reuse and access arrangements align with community aspirations.

7.2.5 Bonds

Bonds provide an important safeguard for both regulators and the community by ensuring that sufficient funds are available to complete rehabilitation and closure obligations if Bathurst, or any future approval holder, is unable to do so. In that event, the bond provides financial assurance that the Project can be safely closed and disturbed land rehabilitated in accordance with the relevant approval requirements.

Bonding is a well-established and widely used mechanism within the New Zealand mining sector and forms a key component of the Project's overall closure and rehabilitation framework.

The proposed bonds will be held for the benefit of the relevant regulators. Any decision to call on a bond will require agreement by the regulatory parties for obligations within their respective jurisdictions.

7.2.5.1 Existing Bonding at Stockton Mine

The existing Stockton Mine, including the Cypress area, is already subject to established bonding arrangements that were put in place by the Crown following the acquisition of the former Solid Energy assets.

Bathurst does not propose any fundamental changes to these existing arrangements. New mining activities within the Stockton Sub-Area will continue to be covered by the current bond framework, which is reviewed and updated annually to reflect the extent of disturbance requiring rehabilitation. Additional bonding associated with the BPCP will therefore primarily relate to the REP approved through the FTA approvals process and the proposed extension areas.

7.2.5.2 Proposed Non-AMD Rehabilitation Bonding Conditions

No additional bonding is required under the proposed consents for non-AMD rehabilitation liabilities within the Stockton Sub-Area.

Bonding for non-AMD rehabilitation will continue under the arrangements established through the *Deed Relating to Bonding* dated 24 August 2017, as varied on 12 August 2025, and as may be further amended from time to time by agreement between BT Mining Limited, the West Coast Regional Council ("**WCRC**"), and the Buller District Council ("**BDC**").

BT Mining Limited will be required to procure and execute the amendments necessary to ensure that the replacement of CML 37 150 and ACMLs 37 150/02 and 37 150/03 with a new mining permit, together with the granting of new regional and district consents, is appropriately reflected in the deed.

As a minimum, the amended deed will provide that BT Mining Limited must not exercise any land use consent granted for the Stockton Sub-Area until the required amendments have been completed.

The Crown provided a Crown Indemnity to BT Mining Limited upon acquisition of the Stockton Mine in 2017 through the Deed of Indemnity entered into between the Crown, Solid Energy New Zealand Limited, WCRC and BDC on 17 September 2015. BT Mining Limited subsequently assumed Solid Energy's position under that arrangement.

Under the indemnity framework, the Crown has placed funds into escrow to meet historical non-AMD rehabilitation liabilities associated with the mine. As rehabilitation works are completed, BT Mining Limited is entitled to draw upon those funds.

The *Deed Relating to Bonding* establishes a mechanism whereby BT Mining Limited provides a bond in favour of WCRC and BDC for the difference between:

- The total assessed non-AMD rehabilitation liability; and
- The value of the Crown Indemnity funds available at that time.

As this framework is currently operating effectively and provides an appropriate level of financial assurance, Bathurst proposes that it remain in place.

The deed will, however, require amendment to reflect the expiry of the existing coal mining licences and the granting of new resource consents. Those amendments must be completed before any new land use consents for the Stockton Sub-Area are exercised.

7.2.5.3 AMD Rehabilitation Bonding

No additional AMD rehabilitation bonding is proposed for the Stockton Sub-Area.

AMD liabilities will continue to be managed through the existing arrangements established under the *Deed of Commitment Relating to the Rehabilitation of Stockton Mine Acid Mine Drainage* dated 31 December 2016, as varied and restated on 8 September 2025.

Under that deed, the Crown assumed responsibility for AMD arising from coal mining activities undertaken by Solid Energy New Zealand Limited and its predecessor, State Coal Mines, prior to 31 December 2016. BT Mining Limited remains responsible for AMD generated from mining activities undertaken from 1 January 2017 onwards and provides a terminal bond in respect of those liabilities.

While BT Mining Limited remains responsible for the site, it must continue to manage and treat all mining-related AMD. Treatment costs attributable to the Crown's historical liability are reimbursed by the Crown in accordance with the deed.

Following completion of non-AMD rehabilitation and satisfaction of the relevant deed requirements, BT Mining Limited is required to transfer ownership of the mine to the Crown, make the required terminal payment, and relinquish responsibility for the site. At that point, the Crown assumes ongoing responsibility for AMD treatment and management.

For the MFS, ESE and UWHR Sub-Areas, the proposed rehabilitation bonding arrangements are described in the *Bond Process Description* prepared by Lane Associates Ltd (2025), included in **Part B** of this application.

7.2.5.4 The Regulators

The Project involves a number of regulatory agencies and landowners with overlapping responsibilities.

The BDC and WCRC will administer the relevant resource consents. BDC will also grant access arrangements over those areas of Council-owned land located within the proposed Stockton mining permit area.

The Crown, through LINZ and/or DOC as applicable, owns land within the ESE, MFS and UWHR Sub-Areas, along with land associated with the proposed pest exclusion areas. The Crown will therefore be responsible for granting access arrangements and other approvals relating to those areas. DOC also has separate responsibilities in relation to concessions and wildlife authorities.

Given these overlapping regulatory and landownership interests, Bathurst considers it important that the Project does not become subject to multiple bonds for the same rehabilitation obligation. Equally, Bathurst seeks to avoid duplication or inconsistency between obligations imposed through resource consents, access arrangements, concessions and wildlife authorities.

As discussed above, existing AMD and non-AMD bonding arrangements at Stockton and Cypress will remain in place.

For the MFS, ESE and UWHR Sub-Areas, Bathurst proposes establishing a single bond for each area in favour of the relevant regulators, including WCRC, BDC and the Crown (through LINZ and/or DOC as applicable). Each bond would secure all obligations arising under the relevant approvals, regardless of whether those obligations originate from resource consents, access arrangements, concessions or wildlife authorities.

The regulators would retain the ability to call upon the bond in accordance with their respective statutory functions.

This approach is consistent with other New Zealand mining projects. For example, the Escarpment Mine currently operates under a single bond held jointly by BDC, DOC and WCRC in relation to both its resource consents and access arrangements.

7.2.5.5 The Applicants

The Project encompasses areas where mining rights are currently held by Bathurst and its subsidiary companies, together with BT Mining Limited. As discussed earlier in this application, for the purposes of the Project these entities are collectively referred to as Bathurst.

Although the companies currently maintain separate bonds for their individual operations, a coordinated bonding framework is proposed for the BPCP. Four bonds are anticipated, being one each for:

- Stockton;
- UWHR;
- MFS; and
- ESE.

The principal distinction from existing arrangements is that the relevant Bathurst entities will collectively assume responsibility for providing the required bond security.

Bathurst's role in the process is limited to establishing and maintaining the required surety. Once provided, the bond operates as an arrangement between the bond provider and the regulators. Bathurst has no ongoing role in administering the bond itself.

Accordingly, while the proposed framework differs from existing arrangements in terms of the entities responsible for providing security, it has little practical effect on the operation of the bonding process.

7.2.5.6 Bond Purpose

The purpose of each bond is to provide financial assurance that closure, rehabilitation and any associated post-closure management can be completed should Bathurst fail to meet its statutory obligations.

In the unlikely event of default or abandonment, the bond would provide regulators with immediate access to sufficient funds to undertake the required closure and rehabilitation works through an appropriately qualified contractor.

Because rehabilitation liabilities vary over time as disturbance areas expand and previously disturbed areas are progressively rehabilitated, the bond quantum will be reviewed annually to ensure that the level of security remains appropriate to the outstanding rehabilitation obligations.

7.2.5.7 Trust

Bathurst is proposing to establish a trust to assume responsibility for certain long-term obligations associated with ecological rehabilitation, residual effects management, predator control and the ongoing management of pest exclusion areas.

If established, the trust would be governed by a Board comprising not fewer than five trustees. Unless otherwise agreed by the regulators, the trustees would include:

- One representative from the Department of Conservation
- One representative from the Buller District Council;
- One representative from the West Coast Regional Council; and
- Two representatives from Te Rūnanga o Ngāti Waewae (Tangata Whenua Trustees).

If Bathurst wishes the trust to assume responsibility for any long-term obligations associated with the REP, the trust must first be established with objectives that include meeting those obligations and that are generally consistent with the trust deed appended as Schedule A to the proposed consent conditions (set out in **Part E**).

Subject to agreement by the regulators, one or more obligations secured by a bond may subsequently be transferred to the trust. Upon transfer, the corresponding bond obligation would cease, and the relevant portion of the bond would either be cancelled or reduced accordingly. Responsibility for those obligations would then rest solely with the trust.

Bathurst would report the value of the trust to the regulators upon transfer of obligations and every five years thereafter for the duration of mining operations.

7.2.5.8 Summary

Bathurst has adopted the bond assessment methodology developed by Lane Associates Ltd (2025) for determining the required bond quantum for each project area. That methodology provides the basis for calculating annual bond requirements and has been incorporated into the proposed conditions of consent contained in **Part E** of this application.

7.2.6 Management Plans

The various approvals to be granted are underpinned by an extensive and integrated suite of management plans that collectively provide the operational framework for avoiding, managing, and monitoring actual and potential environmental and social effects throughout the life of the Project. These plans are not standalone documents prepared solely for compliance purposes; rather, they are practical, interlinked tools that guide day-to-day decision-making, construction practices, operational controls, monitoring, and long-term closure outcomes.

Key management plans have been prepared in final draft form in advance of submitting this substantive application and are informed by detailed technical assessment and independent peer review. This approach provides upfront transparency and demonstrates how effects will be addressed in practice, while recognising that these plans will be further refined and finalised after approvals are granted to reflect consent conditions and any additional requirements. The submission of advanced draft plans enables effects to be clearly identified and addressed through proposed conditions that require their implementation.

The management plans are structured to reflect the differing characteristics of Project phases – construction, operation, and closure – while maintaining continuity through shared objectives, performance standards and adaptive management processes. Together, they form a coherent management system that is responsive to site-specific conditions, informed by ongoing monitoring, and capable of being refined over time where necessary, including throughout the processing of this substantive application. **Table 7-1** below summarises the management plans that will be implemented as part of the Project's overall obligations framework:

Table 7-1: BPCP Management Plans

Document Reference	Management Plan Title	Author/s
BPCP-ENV-PLN-050	Conceptual Mine Closure Strategy[31]	IEMA
BPCP-ENV-PLN-008	Weed Management Plan	EcoLogical Solutions
BPCP-ENV-PLN-002	Rehabilitation Management Plan	EcoLogical Solutions

[31] The Mine Closure Management Plan required by the proposed conditions expands upon and gives effect to the Conceptual Mine Closure Strategy through a progressively refined closure planning process.

Document Reference	Management Plan Title	Author/s
BPCP-ENV-PLN-003	Avifauna Management Plan	EcoLogical Solutions
BPCP-ENV-PLN-004	Powelliphanta Management Plan	Lloyds Ecological Consulting
BPCP-ENV-PLN-009	Biodiversity Outcome Monitoring Plan	Alliance Ecology
BPCP-ENV-PLN-022	Pest Control and Elimination Plan	Alliance Ecology
BPCP-ENV-PLN-005	Lizard Management Plan	Alliance Ecology
BPCP-ENV-PLN-007	Biosecurity Management Plan	EcoLogical Solutions
BPCP-ENV-PLN-006	Aquatic Ecology Management Plan	Earth Sciences New Zealand
BPCP-ENV-PLN-010	AMD: Water Management Plan	MWM
BPCP-ENV-PLN-011	AMD: ELF Management Plan	MWM
BPCP-ENV-PLN-013	Erosion and Sediment Control Plan for Land-Disturbance Activities	Bathurst
BPCP-ENV-PLN-012	Water Infrastructure Design Plan	Bathurst
STO-ENV-PLN-016	Stockton Mine AMD Environmental Management Plan (including Mangatini Sump Management Plan; McCabes Sump Management Plan; MW16 Sump Management Plan)	Bathurst
STO-ENV-PLN-013	Stockton Mine Water Environmental Management Plan	Bathurst
STO-ENV-PLN-027	Millerton Block Water and AMD Management Plan	Bathurst
STO-TEC-PHMP-002	Stockton Mine Ground and Strata Instability Principal Hazard Management Plan	Bathurst
BPCP-ENV-PLN-020	Historic Heritage Management Plan (including appended Archaeological Management Plan)	Clough & Associates

Document Reference	Management Plan Title	Author/s
BPCP-ENV-PLN-019	Traffic Management Plan	IEMA
BPCP-ENV-PLN-018	Lighting and Visual Amenity Management Plan	IEMA
BPCP-ENV-PLN-017	Dust Management Plan	Tonkin + Taylor
BPCP-ENV-PLN-016	Noise, Blasting and Vibration Management Plan	IEMA
BPCP-ENV-PLN-015	Waste Management Plan	IEMA
BPCP-ENV-PLN-014	Hazardous Substances Management Plan	IEMA
STO-ENV-PLN-029	Ngākawau OEMP (dust, noise, water, lighting)	IEMA

Typically, the management plans required by the conditions of resource consents are certified by the Council prior to the commencement of construction. As outlined in the sections above, the proposed management of effects of the BPCP will largely be controlled and implemented through the various management plans that are proposed and required by the conditions of these consents. A number of the management plans will relate to areas that overlap between the responsibilities of the regional and district councils, as well as in some cases (such as the Wildlife Permits, Concessions and AAs), DOC, Heritage NZ, LINZ and/or NZPAM.

Given the scale of the Project and the range of activities it spans, Bathurst is also proposing an independent peer review process for the management plans required for the construction, operation, and closure of the BPCP.

The management plan certification process is set out in proposed conditions MP1-MP16 and shown in **Figure 7-1** below. Bathurst will nominate an independent, Suitably Qualified and Experienced Person(s) to form the independent Peer Review Panel for the Project. The Panel will be approved by the relevant consent authorities and have relevant experience in large-scale mining operations and/or rehabilitation-type activities.

For those management plans identified in the proposed conditions (in **Part E**), Bathurst will submit the relevant plans to the Peer Review Panel for review prior to certification. Other

management plans will be prepared and certified in accordance with the proposed management plan framework and consultation requirements. The Panel will provide technical guidance and recommendations on the management plan(s). Once reviewed, Bathurst will amend the management plans where appropriate and submit the management plan to the relevant council (depending on the jurisdiction and the activities covered in the management plan as outlined in **Table 7-1** above) for certification. A report prepared by the Panel will accompany the management plan for certification. This report will set out how the management plan, in the opinion of the Panel reviewer, meets its intended objectives and is (or is not) consistent with the condition requirements and outcomes. The proposed certification process will ensure that the effects associated with the Project are appropriately managed and provided for.

As part of this process and reflecting the nature of the Project and the range of statutory approvals required, DOC and Te Rūnanga o Ngāti Waewae have an important and ongoing role in informing a number of management plans. Engagement with both parties is already underway as part of the BPCP's development and will continue throughout the refinement, finalisation, and implementation of these plans.

Recognising the complexities associated with multiple approval pathways and the involvement of several statutory decision-makers, DOC is not proposed as a certifier of management plans within the condition framework. Instead, both DOC and Te Rūnanga o Ngāti Waewae will continue to be engaged as technical and cultural commentators, including through opportunities to review and provide input on relevant draft and final management plans. This approach ensures that DOC's technical expertise and statutory interests, along with Te Rūnanga o Ngāti Waewae's cultural values and mātauranga Māori, are appropriately incorporated into the management plan framework, while maintaining a clear, efficient, and workable certification process through the relevant consent authorities.

MANAGEMENT PLANS CERTIFICATION PROCESS FLOW CHART

1. MANAGEMENT PLANS (MP1)

24 management plans are required and are grouped as follows

GENERAL OPERATIONAL

1. Noise, Blasting and Vibration **(B)**
2. Lighting and Visual Amenity **(B)**
3. Dust **(B, W)**
4. Waste **(W)**
5. Hazardous Substances **(B, W)**
6. Ngākawau Operational Environmental **(B, W)**
7. Traffic Management Plan **(B)**
8. Historic Heritage **(B)**
9. Archaeological **(B)**

ECOLOGY

10. Weed **(B)**
11. Pest Control and Elimination **(B)**
12. Biosecurity **(B, W)**
13. Avifauna **(B)**
14. *Powelliphanta* Snail **(B)**
15. Lizard **(B)**
16. Biodiversity Outcome **(B, W)**
17. Rehabilitation **(B, W)**
18. Aquatic Ecology **(W)**

WATER

19. AMD Water **(W)**
20. AMD Engineered Landform **(W)**
21. Erosion and Sediment Control Plan for Land Disturbance Activities **(W)**
22. Water Infrastructure Design **(W)**
23. Stockton Mine Environmental Water **(W)**
24. Stockton Mine AMD Environment **(W)**, along with the sub-plans **(W)**:
    i. Millerton Block Water and AMD
    ii. Mangatini Sump
    iii. McCabes Sump
    iv. MW16 Sump

MP16. CERTIFICATION

Note: the Regional and/or District Council responsible for certifying or recertifying each management plan listed in Condition MP1

(B) *Buller District Council*

(W) *West Coast Regional Council*

2. TRANSITIONAL ARRANGEMENTS (MP2)

1. Continue existing activities under current approved plans — no expansion
2. Within 40 working days: submit a transition programme to Council
3. Identify current plans and their replacement MP1 plans
4. Set out consultation, review, certification and implementation timeframes
5. Within 12 months: submit replacement plans for certification, unless Council approves a later date.

3. ESTABLISH PEER REVIEW PANEL (MP3)

Upon Project Commencement Notice:

1. Nominate 3–4 Suitably Qualified and Experienced Person covering:
   - Geochemistry/AMD
   - Civil/geotechnical engineering
   - Aquatic ecosystems/water quality
   - Rehabilitation/terrestrial ecology
2. Provide evidence of qualifications and independence
3. Councils appoint the Peer Review Panel
4. The Approval Holder pays all costs.

4. PLANS REQUIRING PEER REVIEW (MP4)

Before certification, the following Plans MUST be reviewed by the Peer Review Panel (via MP7):

1. MP11 Pest Control and Elimination
2. MP17 Rehabilitation
3. MP18 Aquatic Ecology
4. MP16 Biodiversity Outcome
5. MP19 AMD Water
6. MP20 AMD Engineered Landform
7. MP23 Stockton Mine Environmental Water
8. MP24 Stockton Mine AMD Environment (and all 4 sub-plans)

5. DEPT. OF CONSERVATION CONSULTATION (MP5)

For the 10 ecology/heritage plans listed, at least 20 working days before submission for peer review/certification:

- MP8 Historic Heritage
- MP10 Weed
- MP11 Pest Control and Elimination
- MP12 Biosecurity
- MP13 Avifauna
- MP14 *Powelliphanta* Snail
- MP15 Lizard
- MP16 Biodiversity Outcome
- MP17 Rehabilitation
- MP18 Aquatic Ecology

6. TE RŪNANGA O NGĀTI WAEWAE CONSULTATION (MP6)

Before peer review/certification:

1. Invite Te Rūnanga o Ngāti Waewae to identify which MP1 plans they wish to review
2. Provide draft plan(s) and allow 15 working days for comments
3. Include written comments received (if any) and a response table with submission

If no comments received within 15 working days, proceed.

7. PEER REVIEW (MP7)

1. Submit draft plan to the Peer Review Panel at least 15 working days before certification
2. Panel checks the plan for compliance, outcomes and good practice
3. Panel provides a written review within 15 working days
4. Address reasonable recommendations from the Panel.

8. SUBMIT FOR CERTIFICATION (MP8)

Submit to the relevant Council at least 15 working days before commencement.

1. For MP4 plans, include:
   - Peer Review Panel report
   - Response to Panel recommendations
   - DoC consultation material (MP5 and MP6)
   - Final management plan
2. For plans outside MP4: Ensure the plan is prepared by a Suitably Qualified and Experienced Person.

9. COUNCIL DECISION (MP9)

If Council:

1. requests changes, or
2. declines to certify

Approval Holder must amend and resubmit.

Except as provided in MP2, DO NOT commence any activity to which the plan relates until it is certified in writing.

10. CONSISTENCY REQUIREMENT (MP10)

Each management plan submitted for certification must be consistent with the draft plan from the FTAA application except to the extent amended to:

1. Align with these conditions, or
2. Incorporate accepted comments from the Peer Review Panel, the relevant Council(s), DoC, or Te Rūnanga o Ngāti Waewae.

11. & 12. POST-CERTIFICATION REQUIREMENTS (MP11-12)

MP11 – Keep the latest certified copy of each plan onsite at all times and update within 5 working days of any certified amendment

MP12 – If any conflict or discrepancy exists between a management plan and the conditions of this approval, the conditions prevail.

13. MINOR AMENDMENTS (MP13)

- Minor amendments are allowed if they remain consistent with the plan and approval conditions
- Notify Council in writing at least 10 working days before implementing the amendment
- Council has 5 working days to determine if the amendment is material
- Material amendments must follow the MP14 process
- Keep a record of all minor amendments.

14. MATERIAL AMENDMENTS (MP14)

- Material amendments require Council review and written certification before implementation
- Amendments must be consistent with the management plan and approval conditions
- Complete required consultation and peer review before submission
- Submit to Council at least 15 working days before the proposed activity starts
- Do not start the activity until the amendment is certified in writing.

15. POST-CERTIFICATION REQUIREMENTS (MP11-12)

MP15 – An existing certified management plan remains in effect until any replacement plan or material amendment is certified in writing.

During the Construction phase, management plans focus on preventing short-term, high-risk effects associated with vegetation clearance, earthworks, stream diversion, infrastructure installation, and increased activity levels. Construction-specific water, erosion, and sediment control plans establish clear procedures for managing runoff, sediment mobilisation, and accidental discharges, with defined responsibilities and trigger-based responses. Ecological management plans require pre-clearance surveys, species-specific protocols, and staged disturbance to minimise habitat loss and fauna mortality. Heritage and archaeological management plans guide site investigations, monitoring, and protocols for accidental discoveries, ensuring heritage values are appropriately addressed before and during ground disturbance. Together, these plans ensure that construction effects are tightly controlled, localised and temporary, and that the infrastructure required to manage operational effects is established early.

In particular, the Erosion and Sediment Control Plan establishes an adaptive, land disturbance management framework based on SQEP-approved site-specific plans, regular inspections, pre-rain event checks, rainfall-triggered monitoring, and rapid corrective actions where sediment controls are underperforming. This provides an important practical bridge between high-level management commitments and on-the-ground implementation in the steep, high-rainfall conditions of the Buller Plateaux.

As the Project transitions into the operational phase, the Erosion and Sediment Control Plan remains relevant to land disturbance activities, whilst other management plans become the primary mechanism for managing cumulative and long-term effects. Water Management Plans and AMD-specific plans, govern the separation of clean and mine-impacted water, the operation of treatment systems, discharge controls, and monitoring requirements. These plans are supported by ecological and water quality monitoring programmes that verify compliance and performance. Similarly, dust, noise, traffic and lighting management plans set operational limits, monitoring requirements and response procedures to ensure effects on amenity and human health remain within acceptable bounds.

Operational ecological management plans - including those for aquatic ecology, terrestrial fauna, vegetation, weeds and pests seek to translate assessment outcomes into practical controls such as buffer zones, staging rules, access restrictions, biosecurity protocols and rehabilitation requirements. These plans are closely integrated with annual mine planning, ensuring that effects management informs mine sequencing rather than responding to it retrospectively. Where management relies on performance outcomes rather than fixed methods, adaptive management provisions allow controls to be refined in response to monitoring results.

Social, recreation and heritage management plans operate in parallel during operations, providing structure for ongoing engagement and continuity. Social management frameworks embed regular communication with communities, iwi and stakeholders, support workforce stability, and formalise commitments to community investment and emergency response capability. Recreational management plans guide access arrangements, temporary closures, route reinstatement, and engagement with user groups, ensuring recreational values are managed transparently and adaptively. Heritage management plans continue to guide interpretation, recording, and enhancement initiatives, reinforcing the Project's commitment to preserving and communicating heritage values beyond the immediate mining footprint.

More specifically, the Historic Heritage Management Plan provides a structured implementation framework that includes engagement with the Project Archaeologist before earthworks commence, the inclusion of heritage constraints in disturbance plans, provision for GPS-based exclusion areas and physical fencing around retained features, and annual reporting of archaeological work, discoveries, and artefact custodianship. It also establishes a Heritage Stakeholders Group to provide an ongoing forum for communication with Heritage New Zealand, DOC, Te Rūnanga o Ngāti Waewae, councils, museums and local heritage groups, and it commits to a Historic Heritage Enhancement Fund to support long-term conservation, interpretation, research, public access and heritage education initiatives beyond the immediate mine footprint.

Beyond active mining, the BPCP's management plans place strong emphasis on closure and post-closure outcomes. This will be given effect through a Mine Closure Management Plan ("**Closure Plan**"), which will be prepared, implemented, maintained and updated over the life of the Project as a live document. The Closure Plan will set out, for each Project Sub-Area and for any staged closure area, the applicable closure objectives, completion criteria, closure works, monitoring, maintenance, adaptive management and contingency measures required to achieve and demonstrate those outcomes. It will also address the decommissioning, removal, remediation, retention or transfer of infrastructure, hazardous materials, wastes, access tracks, culverts, drains, bridges, water bodies, passive treatment systems and any other features proposed to remain following closure.

The closure framework is directed toward ensuring that each Project Sub-Area is left in a condition that is safe, stable, self-sustaining and compatible with the surrounding landscape, ecological values, cultural values, water management requirements and any agreed ongoing public or management access. In practical terms, this requires final landforms to be physically and geotechnically stable, free-draining and not subject to material erosion, scour, mass movement or other instability; PAF and HAF materials to be identified, segregated, encapsulated, capped or otherwise managed to minimise AMD

generation and contaminant mobilisation; surface water and groundwater effects to be managed so that applicable compliance limits and water quality objectives are met; and retained lakes, wetlands, tarns, treatment systems and other water bodies to be physically and chemically stable and non-toxic to aquatic life.

The RMP is also central to that closure framework. It links mine planning, landform design, resource salvage, VDT, revegetation, fauna habitat creation, stream reinstatement, and biodiversity monitoring into a single, progressive programme, so that closure outcomes are built incrementally throughout the life of the Project rather than deferred to the end. Importantly, progressive rehabilitation will be expressly required through the proposed conditions and will operate alongside clear limits on the extent of disturbance that may remain open within any Project Sub-Area at any one time. This will ensure that rehabilitation is not treated as an end-of-mine activity but as an integral and ongoing operational requirement that constrains mine sequencing, reduces the total active disturbance footprint, and requires that completed or inactive areas be rehabilitated as soon as practicable. Rehabilitation is required to establish indigenous vegetation communities appropriate to the local environment and the intended rehabilitation domain, including native forest, shrubland, pākihi, wetland, and rockfield ecosystems, as applicable. Monitoring will continue into the post-closure period to confirm that vegetation cover, species composition, habitat features, weed and pest levels, ecosystem development, landform stability, and water quality are tracking toward and ultimately achieving the relevant completion criteria.

The level of detail in the Closure Plan will increase as each Project Sub-Area approaches closure. For areas not anticipated to close within five years, the plan may remain strategic, identifying intended outcomes, principal methods and further investigations required. For areas within five years of closure, or where permanent cessation of mining has occurred, the plan will be updated to provide sufficient detail to guide implementation and support certification. Any Final Closure Plan submitted for certification will need to be supported by as-built plans, final landform surveys, geotechnical confirmation, surface water and groundwater monitoring data, evidence of compliance with water quality and discharge criteria, ecological monitoring results, QA/QC records for closure works, and records confirming the removal, remediation, containment or lawful retention of infrastructure, hazardous substances, contaminated materials and residual wastes.

The closure outcomes will also be tailored to the characteristics of each Project Sub-Area. At Stockton, closure will focus on reshaping, capping and revegetating disturbed areas, while retaining, operating, maintaining, replacing or decommissioning active and passive AMD treatment systems as required to achieve the applicable water quality objectives. In the MFS and ESE Sub-Areas, ELFs will be constructed with PAF/HAF encapsulation, capping,

compaction, drainage control and seepage management, with active treatment continuing until monitoring demonstrates that passive systems and final landform performance are sufficient to maintain compliance. At ESE, the final lake, wetlands, drainage and treatment features will need to be physically and chemically stable and protective of downstream receiving environments. For the UWHR, closure will focus on reducing the haul road corridor to the minimum width required for any agreed post-closure access or management function, removing or recontouring redundant pavement and laydown areas, reinstating stable drainage patterns, revegetating disturbed surfaces and restoring indigenous vegetation and habitat connectivity.

Where any closure completion criterion has not been achieved, ongoing monitoring, maintenance, treatment, repair, revegetation, weed and pest control, replacement planting or other remedial measures will continue until the relevant criterion is met. In this way, the closure and rehabilitation framework provides both a clear pathway to progressive closure and a robust mechanism for demonstrating, through evidence and certification, that long-term environmental, water quality, ecological, cultural, public safety and land-use outcomes have been achieved.

Importantly, the management plan framework also incorporates plans designed to address residual and cumulative effects that cannot be fully mitigated on site. The REP together with Biodiversity, Pest and Weed Management Plans, provide a long-term, landscape-scale response. These plans are designed to endure beyond the Project's operational life and are fundamental to delivering lasting environmental, cultural and social benefits.

Across all phases, the management plans are bound together by a common adaptive management philosophy. Monitoring programmes generate data that is regularly reviewed against defined objectives, performance standards, and trigger levels. Where monitoring identifies unexpected outcomes or emerging risks, management responses can be implemented promptly and refined over time. This approach ensures that the management system remains responsive to actual conditions on the ground rather than being constrained by static assumptions made at the time of application.

For water management in particular, this adaptive framework is supported by a monitoring regime that differentiates background, compliance, performance and reference-site monitoring, allowing discharge quality, treatment performance, seepage behaviour and receiving environment responses to be tracked through all project phases and used to trigger timely management responses where required.

The outcomes of this water management will also directly inform terrestrial ecological management, particularly in relation to rehabilitation, soil development, and the maintenance of functional linkages between aquatic and terrestrial systems. Terrestrial

ecological management plans translate this information into practical controls, including habitat design, buffer establishment, staging of disturbance, and revegetation approaches that respond to water quality and hydrological conditions. In this way, water quality monitoring acts as a key feedback mechanism within the adaptive management framework, supporting the refinement of terrestrial management measures and strengthening the integration of land and water outcomes to achieve long-term ecological resilience and biodiversity objectives.

In summary, the management plans prepared for the BPCP form an integrated, life-of-project framework that provides clear, practical controls to operationalise conditions with clear, measurable objectives and requirements. They provide certainty around how effects will be managed, accountability through defined responsibilities and monitoring, and flexibility through adaptive management. Taken together, they demonstrate that the Project has been designed not only with a clear understanding of its potential effects, but with a robust system in place to manage those effects effectively from construction through to long-term closure.

A summary of the proposed mitigation strategies, management plans, requirements and monitoring obligations is set out in **Table 7-2** below.

Table 7-2: Summary of Key Management and Monitoring Measures for the BPCP

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Cultural Effects		
Potential effects on matters of importance to Te Rūnanga o Ngāti Waewae, and their relationship with ancestral lands and water.	Additional details to be confirmed following further engagement with Te Rūnanga o Ngāti Waewae. Implementation of an accidental discovery protocol and practices as described in this Table under the Historic Heritage and Archaeology heading.	Details to be confirmed following further engagement with Te Rūnanga o Ngāti Waewae.
Hydrological Effects		
Hydrological and water-quality effects arising from altered runoff pathways, mine-impacted water generation, sediment mobilisation, and controlled high-flow discharges.	Apply a risk-based water management framework that separates clean water from mine-impacted water, uses clean water diversions and staged collection systems, and provides phase-specific treatment through portable systems during construction, active water treatment plants during operations, and passive treatment systems during closure and post-closure. Implement adaptive erosion and sediment controls during land disturbance and infrastructure construction, including staged earthworks, sediment retention ponds, clean-water diversion drains, dirty-water drains, rapid stabilisation of exposed surfaces, and site-specific erosion and sediment control plans that can be refined as conditions change.	Undertake background, compliance, performance and post-closure monitoring of flows, seepage, treatment performance and receiving water quality. Use monitoring results and trigger-based responses to refine treatment, storage, discharge controls and other management measures over time, and to verify both compliance and any water-quality improvement achieved through interception of legacy discharges. The proposed water monitoring sites at Stockton and at the extension areas (ESE, MFS and UWHR) are shown in **Figures 7-2 and 7-3** below, respectively. Full versions of these plans are included in **Part D – Project Maps and Figures**.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	Manage ELFs and disturbed areas to minimise AMD generation and seepage, and provide controlled bypass or spill mechanisms only during defined high-flow events where full capture and treatment is not practicable. In the Stockton Sub-Area, these measures are complemented by the continuation of active and passive treatment, management of legacy AMD sources, and adaptive monitoring and reporting for long-term recovery.	

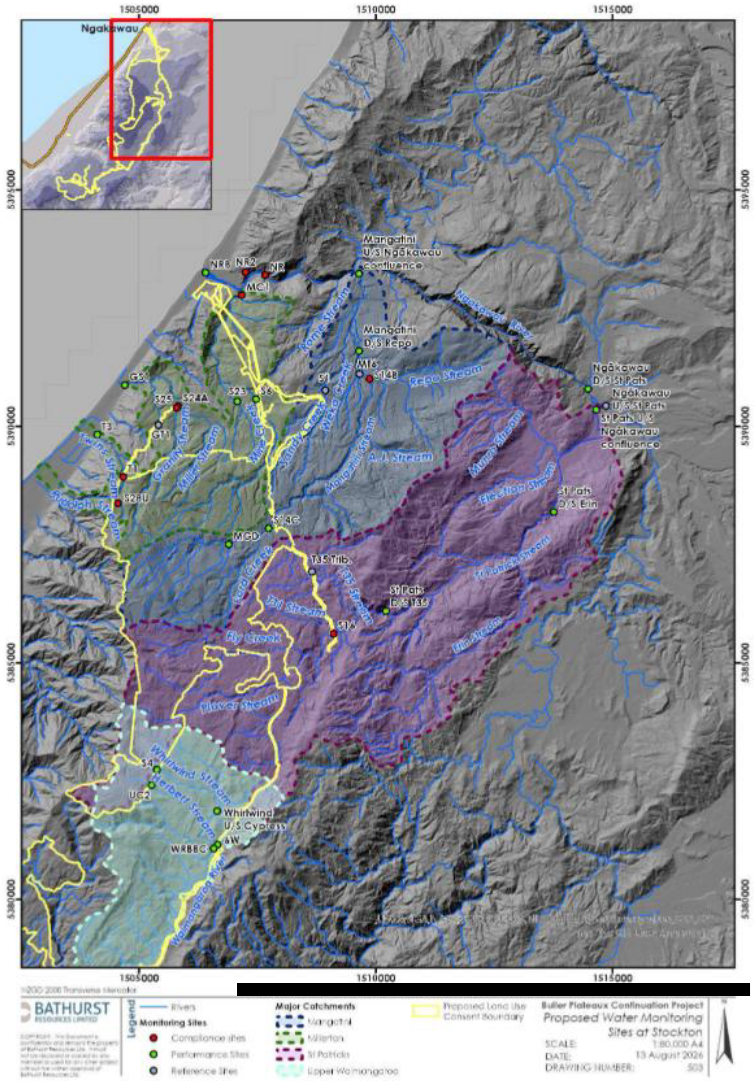

Figure 7-2: Proposed Water Monitoring Sites at Stockton

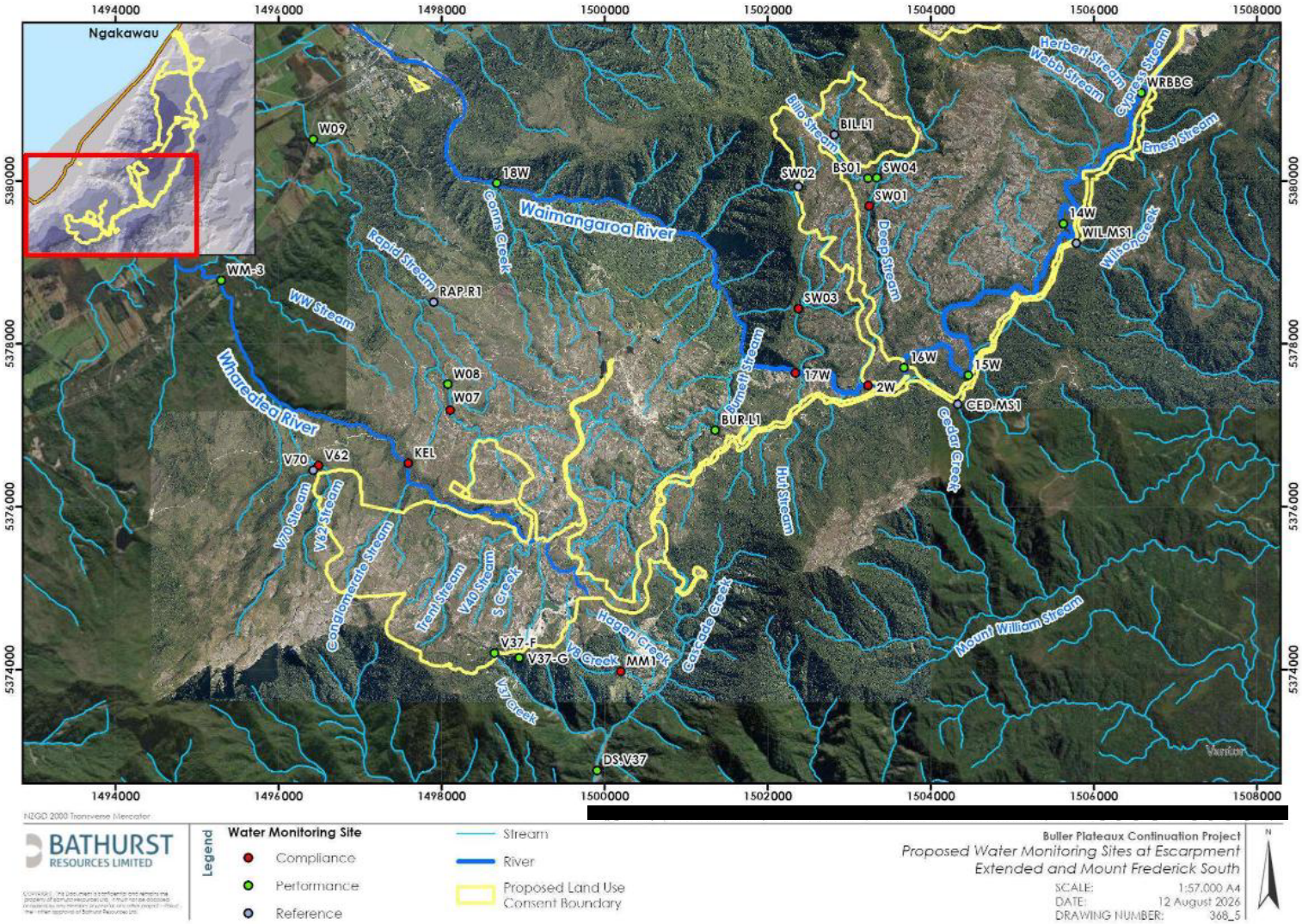

Figure 7-3: Proposed Water Monitoring Sites at ESE, MFS and UWHR

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Generation of AMD.	Progressive encapsulation of PAF materials within ELFs. Capture and treatment of mine impacted water using active and passive systems. Ongoing management of legacy AMD sources.	Routine monitoring of mine impacted water, receiving waters and seepage for pH, metals, sulphate and conductivity. Long-term post-closure monitoring of receiving waters.
Seepage from ELFs affecting surface water or groundwater quality.	ELF design, construction and material placement to minimise sulphide oxidation and seepage generation. Collection and treatment of seepage where required.	Seepage and down-gradient water quality monitoring. Adaptive management triggered where trends indicate increasing contaminant loads.
Potential effects on aquatic biota from mine-derived contaminants.	Maintenance of water quality within Project-specific guideline values derived for protection of aquatic biota. Treatment of mine impacted water prior to discharge.	Periodic review of water quality and ecological response data. Adaptive management where risks to sensitive taxa are identified.
Aquatic Ecology / Freshwater Quality Effects		
Alteration of aquatic habitat during construction.	Design and construct ELFs to minimise acid generation and sediment mobilisation. Relocate highly valued fauna (e.g. kōura) prior to disturbance. Undertake VDT where practicable, to retain riparian vegetation for reuse in stream reinstatement.	Monitoring to be undertaken as per the Aquatic Ecology Management Plan (provided in **Part G**), which includes: > Inspection of disturbed reaches following works; > Verification of fauna relocation outcomes; and > Adaptive management where required
Road construction impacts during the construction phase.	Minimise waterway crossings through route selection. Use NAF material for bulk fill areas, where available. Install geosynthetic clay liners above high-risk fills.	Post-construction inspection of culverts and crossings, including following major rainfall events. Remedial works where performance issues are identified.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	Install appropriately sized culverts to maintain flow, and to facilitate kōura passage where practicable. Apply erosion and sediment controls during land disturbance.	
Sediment release during construction.	Install and maintain sediment retention ponds, silt fences, traps and other site-appropriate erosion and sediment controls in accordance with the Erosion and Sediment Control Plan and site-specific plans. Isolate clean water from disturbed areas through diversion drains and perimeter controls, stage works to minimise exposed areas, and rapidly stabilise exposed surfaces using topsoil replacement, hydroseeding, erosion control matting, slash or VDT, as appropriate. Achieve ≥100 mm visual clarity prior to discharge, with chemical flocculation or other treatment responses available where monitoring indicates additional treatment is required.	Routine inspections and turbidity/clarity monitoring. Adaptive refinement of controls where monitoring indicates elevated sediment risk.
Changes to water quality during construction.	Refuel and store machinery, fuel and chemicals away from waterways to reduce spill risk. Collect and securely store any chemically contaminated wastewater for appropriate disposal. Maintain spill prevention kits, containment equipment and contingency procedures at all construction areas. Treat low-pH waters, where encountered, to a pH suitable for the receiving environment prior to discharge.	Inspect construction areas for adherence to spill prevention and refuelling controls. Confirm treatment effectiveness for any low-pH water prior to release, with corrective action implemented where required.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Stream diversion and in-stream works (including mortality of biota at the site of minor in-channel works) during construction.	Construct temporary diversion channels or install culverts to maintain hydrological connectivity and continuous downstream flow during stream realignment, removal or culvert installation. Relocate aquatic biota, where practicable, prior to instream works. Stabilise and rehabilitate disturbed banks and channels as soon as practicable following works to prevent erosion and sediment release.	Inspect diversion channels and reinstated banks during works and following rainfall events. Confirm stability and reinstatement effectiveness and implement remedial works if erosion or instability is identified.
Potential passage barriers for aquatic fauna during construction.	Design all culverts and crossing structures in accordance with Project-specific guidance to facilitate upstream passage of kōura.	Inspect culvert structures after major flood events and no less than annually to identify scour, blockage or passage issues. Undertake remedial works promptly where issues are identified.
Noise, vibration, and light disturbances to aquatic ecology during construction.	Avoid heavy machinery use and blasting near streams where practicable. Design temporary and permanent lighting to minimise attraction of adult winged insects, particularly in proximity to waterways and riparian margins.	Review construction practices and lighting where effects on aquatic or riparian habitats are observed, with adaptive management implemented as required.
Stream habitat destruction during the operational phase.	Prior to stream removal, relocate aquatic fauna and salvage streambed substrates for use. Return treated mine impacted water to affected sub-catchments to maintain downstream connectivity.	Verification of stream loss and reinstatement extents. Monitoring of reinstated reaches post-construction. Use of the stored substrates in post-mining stream habitat restoration to support recolonisation. Adaptive modification of channel form, substrates or flows where required.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Erosion and sediment inputs during the operational phase.	Manage as per during construction phase, following good erosion and sediment control practices as defined in the BPCP's ESCP (Bathurst, 2026y).	Conduct regular inspections and maintenance of erosion and sediment control structures, particularly after heavy rainfall events, to ensure continued effectiveness. Monitor turbidity and fine sediment deposition at selected monitoring sites and adapt mitigation activities (which may include potentially flushing smaller streams) if necessary. Use findings to inform adaptive management and monitoring frequency.
AMD and water contamination during the operational phase.	Capture and treat mine impacted water using active or passive treatment systems to maintain Project-specific water quality targets. Maintain sufficient storage, conveyance and treatment capacity to manage mine-impacted water and storm events, ensuring discharges meet Project-specific water quality targets for the protection of aquatic ecosystems.	Monitor water quality and aquatic biota throughout the active mining phase to detect and respond to marked changes in environmental parameters/indicators (through Trigger Action Response Plans).
Hydrological alterations during the operational phase.	Maintain hydrological continuity in diverted streams. Sustain minimum flows. Design diversions to mimic natural flow variability. Regulate treated water releases during low-flow periods. Stabilise diversion banks.	Flow monitoring at key sites. Adaptive management of diversion operations and release regimes based on monitoring results.
Loss of riparian vegetation (in mined areas near	Progressive rehabilitation of mined areas near streams, including VDT to replace vegetation.	Inspection of rehabilitated margins to verify vegetation establishment and stability.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
streams) during the operational phase.		Adaptive replanting or enhancement where riparian recovery objectives are not met.
Nutrient enrichment and periphyton blooms during construction and operation.	Manage nutrient inputs associated with mining activities through operational controls (e.g. blasting) and rehabilitation activities (e.g. fertiliser application). Implement nutrient monitoring and adaptive management responses when receiving water thresholds are exceeded, including review of blasting practices, explosive management, fertiliser application rates and timing, and other potential nutrient sources, to minimise the risk of eutrophication and periphyton proliferation.	Monitoring of nutrient concentrations and periphyton growth in receiving waters. Trigger-based responses are to be implemented when thresholds are exceeded, with review of contributing activities and mitigation effectiveness.
Noise and human activity near waterways during the operational phase.	Mitigate in accordance with measures applied for construction noise and lighting. Apply Check-Clean-Dry protocols for all personnel and contractors working in and around the Buller River and prior to entering waterways within the mining footprint to prevent didymo spread.	Periodic review of compliance with noise, lighting and biosecurity protocols. Investigation and corrective action if biosecurity breaches or nuisance effects are identified.
Water quality improvements (positive effects) during the operational phase.	Add treated mine water to Cascade Creek via V8 Creek (tributary) and seal off historic underground adit drainage. Improvements in ecological condition in upper reaches of Cascade Creek expected following improvements in water quality and instream habitat (by reducing load of precipitate-forming metals).	Ongoing monitoring of water quality and ecological condition in Cascade Creek to verify improvements relative to baseline conditions.
Impacts to aquatic ecology following permanent stream loss in the	Reinstate streams and/or waterbodies as mining infrastructure is removed and ELFs are finalised, including channels with	Long-term monitoring of reinstated aquatic habitats to confirm stability, habitat function and recolonisation success, with adaptive enhancement where recovery objectives are not met.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
closure/post-closure phase.	appropriate instream habitat complexity and planted riparian margins to stabilise banks and provide shading. Where appropriate, create ponds, tarns or closure waterbodies. Support recolonisation through targeted translocation of kōura, bryophytes and aquatic macroinvertebrates where required.	
Impacts to aquatic ecology in respect to sediment and residual sediment quality in the closure/post-closure phase.	Stabilise and revegetate final ELFs and disturbed areas. Cap exposed waste rock and other disturbed surfaces with soil and vegetation to minimise erosion, sediment generation and contaminant mobilisation, while maintaining appropriate mine water management controls. Retain selected settling ponds in the ESE and MFS Sub-Areas as long-term polishing systems to reduce sediment and metal loads during closure.	Monitoring of sediment sources, settling pond performance and downstream receiving environments, with adaptive measures implemented where legacy sediment effects persist.
AMD contamination and treatment performance in the closure/post-closure phase.	Maintain water treatment until AMD loads reduce to environmentally acceptable levels. Transition from active treatment (water treatment plants) to passive treatment (mussel shell reactors) when conditions allow, with systems sized to accommodate post-closure contaminant loads and high-rainfall conditions. Implement monitoring and adaptive management to address any identified effects of elevated pH on bryophytes associated with AMD treatment.	Implement monitoring and adaptive management to address any identified effects of elevated pH on bryophytes associated with passive AMD treatment. Assess closure success through long-term water quality and ecological monitoring until performance meets consented thresholds.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Altered stream morphology and hydrology in the closure/post-closure phase.	Reconnect or reinstate temporary watercourses diverted during operations. Design retained pit lake outlets to overflow safely and mimic natural downstream flow patterns.	Ensure reconstructed reaches have habitat structure, hydraulic stability, and resilience to high-flow events. Monitor channel form and flow behaviour post-closure, with adaptive re-profiling or modification where required to improve resilience and ecological function.
Stockton specific	Manage Stockton waterways through an improvement-focused framework, including active and passive AMD treatment, clean-water diversion, controlled capture and treatment of mine-impacted water, capping of disturbed materials, rehabilitation, and progressive reduction of AMD sources where practicable. Classify streams as impacted, recovering or recovered using pH and dissolved aluminium as key indicators, while recognising naturally acidic BCM conditions.	Undertake adaptive water-quality and ecological monitoring to track improvement over time, including pH, dissolved aluminium, relevant metals, turbidity, macroinvertebrates, fish, periphyton, bryophytes, kōura where present, habitat, and sediment quality. Use monitoring results, reference sites and periodic reviews to refine AMD treatment, rehabilitation, discharge management and closure measures where improvement is not tracking as predicted.
Terrestrial Ecology and Wetland Effects (including Terrestrial Invertebrates, Avifauna and Lizards)		
Vegetation disturbance - 341 ha direct impact on terrestrial habitat, plus additional edge effects.	Refine construction methods and timing of clearance. Salvage and relocation operations. Progressive rehabilitation using VDT, native planting and landform diversification. Specific management and creation of habitat for threatened and at risk species (including bryophytes). Staged remediation. Management of edge effects through planting, biosecurity and weed control.	Monitoring of rehabilitation establishment, vegetation composition, wetland extent and habitat attributes in accordance with the RMP and Biodiversity Outcome Monitoring Plan. Verification of rehabilitation success against defined closure criteria, including indigenous plant cover, species richness, weed thresholds, fauna habitat features and ecosystem trajectory. Adaptive refinement of rehabilitation methods where monitoring shows outcomes are not tracking as intended.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Direct and indirect effects on natural inland wetlands, including pākihi, flushes, seeps, tarns and wetland shrubland.	Avoid and minimise wetland loss and degradation through iterative mine planning, clear disturbance boundaries, staged clearance, erosion and sediment controls, clean-water diversion, spill prevention, dust management, weed and pest control, and maintenance of wetland hydrology where practicable. Where disturbance cannot be avoided, prioritise VDT and direct transfer of wetland vegetation, soils, seedbanks, bryophytes, lichens and microhabitats to suitable rehabilitation areas. Rehabilitate disturbed areas progressively to re-establish indigenous wetland, pākihi, tarn and seep-like habitats where practicable, recognising that natural inland wetlands comprise a substantial component of the disturbance footprint and include high-value naturally uncommon ecosystems.	Monitor wetland rehabilitation establishment, hydrological function, vegetation composition, weed presence, wetland extent, bryophyte/lichen habitat, fauna habitat features and the performance of VDT/direct transfer areas. Use monitoring to confirm whether wetland and pākihi rehabilitation is tracking toward intended closure outcomes, including indigenous dominance and self-sustaining ecosystem function, and adapt rehabilitation methods, planting, hydrological controls, weed control or pest control where outcomes are not being achieved. Undertake outcome-based monitoring across rehabilitation areas and REP sites to confirm whether wetland, pākihi and associated biodiversity outcomes are being delivered over time. Monitoring should track wetland condition, indigenous vegetation dominance, weed reduction, pest control effectiveness, habitat quality for wetland fauna and threatened/at-risk species, and whether the REP, including Blackburn–Pākihi, is delivering sufficient biodiversity gains to address residual wetland losses and time-lag effects.
Residual loss of terrestrial vegetation and delayed habitat replacement.	Implement offset and residual effects measures (as per the REP) including expansive weed control across the Weed Management Area, landscape-scale pest control, and habitat protection to compensate for time-lag effects between clearance and habitat replacement. Avert loss of vegetation at Mt William.	Outcome-based monitoring to confirm net vegetation benefits across offset and residual effects areas through time.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Actual and potential adverse effects on Great Spotted Kiwi/Roroa, as well as on some wetland birds and forest birds.	Mitigation: > Methods of habitat clearance (including timing where practicable); > Close monitoring of affected individuals and management if required (e.g. to move a kiwi out of an area to be cleared). Remediation: > Provision of fauna habitat as part of rehabilitation.	Additional offset/residual effects measures proposed by Bathurst include: > Mammalian pest/weed control; and > Exclusion fences. These result in net positive outcomes, and reverse the decline which would otherwise be occurring.
Inadvertent injury to or death of avifauna (including roroa and weka).	This will be managed in accordance with the AvMP, including: > Pre-clearance detection protocols and avoidance of bird breeding season where practicable; > By August 2027, attach radio transmitters to at least 50% of roroa detected and map territories; > Undertake staged capture and translocation of weka into pest-free enclosures (North Denniston by 2027, Coalbrookdale by 2030, Mt Augustus and Whirlwind by 2034) in accordance with DOC translocation standards as well as the appropriate Wildlife Act Authorisation conditions.	Monitoring actions in accordance with the AvMP, including: > Post-release monitoring of translocated weka for at least 12 months, with a minimum 80% survival target; > Annual reporting and five-yearly independent ecological audits to confirm that the Project delivers net positive avifauna outcomes within 10 years of intensive pest control and no later than 35 years from consent commencement; > Within 12 months of construction of the UWHR, minimise bird–vehicle strike and road-kill incidents through: o Mapping of high-risk zones (i.e. areas where roads intersect known bird habitat values) and informing all drivers using the UWHR of the location of these areas and the need to drive with care; and > Real-time reporting of all wildlife incidents, with quarterly monitoring showing zero repeated incidents at identified hotspots.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Actual or potential adverse effects to lizards.	Mitigation: > Methods of habitat clearance (including timing where practicable); and > Salvage and relocation. Remediation: > Provision of habitat as part of rehabilitation.	Additional offset/residual effects measures proposed by Bathurst include: > Mammalian pest/weed control; and > Exclusion fences. Implementation of these measures will result in net positive outcomes to lizards.
Potential adverse effects to lizards during handling, sampling and transport.	This will be managed in accordance with the LMP, including: > Limiting handling to be kept to a minimum, and to be undertaken only by experienced personnel operating under a Wildlife Act Authority; and > Applying strict animal welfare protocols including short holding times (under 24 hours), appropriate containers, cover and moisture.	Review of handling outcomes and incident reporting, with procedural refinement if required.
Actual and potential adverse effects to terrestrial invertebrates (including *P. patrickensis*).	Mitigation: > Salvage and relocation of snails. Remediation: > Creation of predominantly indigenous vegetation as part of rehabilitation.	Additional offset/residual effects measures proposed by Bathurst include: > Mammalian pest/weed control; and Exclusion fences.
Snail habitat loss, degradation and mortality.	This will be managed in accordance with the PSMP, including: > Avoiding disturbance to snail habitat where not essential for mine construction;	Monitoring to be undertaken in accordance with the PSMP, including: > Monitoring of snail populations and habitat condition; and

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	> Use of VDT wherever practicable. Where VDT is not feasible, strip and directly transfer soils and vegetation to final laydown sites; > Salvage and relocate snails where avoidance is not possible, prioritising pest exclusion areas; > Reduce habitat degradation through dust suppression, drainage design, and exclusion of public vehicle access during mine life.	> Ongoing research and adaptive management to improve the outcome of rehabilitation by planting and/or seeding.
Biosecurity / Pest Management		
Introduction or spread of unwanted pest species within the Project Area (including the Blackburn-Pākihi offset and residual effects area).	Implementation of the Biosecurity Management Plan (prepared in accordance with proposed consent condition BIO3), with pest surveillance treated as a shared responsibility across all personnel ("see something, say something"). Provide site inductions and refresher training on target species and reporting procedures. Establish a reporting system for suspected incursions. Designated Bathurst staff to monitor external intelligence sources (e.g. iNaturalist, media) at least monthly. Field staff will be trained and equipped to record and sample suspected pest species, with identification confirmed by the Weed Management Team.	Ongoing and adaptive management responding to emerging threats and regional spread of invasive species. Review and update biosecurity responses as new risks emerge nationally or locally.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
The presence of pest invertebrates (including ants and wasps) affecting rehabilitation and ecological outcomes.	Monitor nurseries, plant hardening-off areas and rehabilitated sites in accordance with the Biosecurity Management Plan, using traps, artificial refugia and baits. Undertake inspections at least three times per year and prior to plant transfer. Implement immediate incursion response and control where previously unrecorded species are detected, including targeted control such as Vespex and Vespulid wasps by trained and approved users.	Species-specific monitoring following eradication for a minimum of three years. Where eradication is not feasible or would result in unacceptable non-target effects, manage the pest as established and adjust control strategies accordingly.
Introduction or spread of plague skinks.	In accordance with the Biosecurity Management Plan, monitor for plague skinks using pitfall traps at off-site nurseries and high-risk locations across the plateaux, including roads, construction areas, stockpiles and active mining areas.	Undertake targeting monitoring following high-risk activities such as plant transfers or tyre movements. Review monitoring results and implement adaptive response measures where plague skinks are detected.
Introduction or spread of aquatic pest species (e.g. didymo) and the potential impact to waterbodies.	Managed in accordance with the Biosecurity Management Plan, including the monitoring of natural and artificial streams, sumps, WTPs and tarns, that are accessed during a given year. Implementation of Check-Clean-Dry protocols for all personnel working in or around waterways. Use eDNA sampling where appropriate to support early detection.	Annual inspection of accessed waterbodies and review of biosecurity status informed by field checks, eDNA results and ad-hoc reporting from personnel.
Impacts of exotic weeds within the Weed Management Area (WMA).	Managed through the implementation of the Buller Plateaux and Blackburn Pākihi Weed Management Plan ("**WMP**", prepared in accordance with proposed consent condition WEM3) across the WMA to prevent, contain and reduce weed infestations.	Monitoring of weed control effectiveness and infestation extent, with adaptive management to prioritise high-risk species and areas.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	Apply early-intervention control to isolate infestations, address historic weed legacy issues, and support the establishment of indigenous vegetation in rehabilitated and undisturbed areas.	Review outcomes to ensure the establishment of indigenous vegetation and long-term ecosystem resilience.
Geotechnical Matters and Natural Hazard Effects		
Risks such as slope instability, subsidence, rock mass variability, and loss of long-term landform integrity associated with disturbed materials and ELFs.	Managed through SQEP-led design processes and implementation of Ground and Strata Instability Principal Hazard Management Plans (GSI PHMPs). These plans provide a framework for geotechnical risk assessment, design criteria and Factors of Safety, monitoring programmes, slope performance criteria, inspection regimes, management of historic underground workings, critical controls, contingency measures and Trigger Action Response Plans (TARPs). Engineering controls, landform design, drainage management and progressive rehabilitation will be applied to maintain geotechnical stability throughout construction, operation, rehabilitation and closure.	Undertake ongoing geotechnical inspections, survey verification, slope performance monitoring, groundwater and seepage monitoring, design-conformance reviews and landform performance monitoring. Monitoring results will be assessed against defined trigger levels, including rainfall and deformation triggers where appropriate, with corrective actions implemented through TARPs and adaptive management processes. Periodic geotechnical review will be undertaken to confirm the continuing validity of design assumptions and update risk assessments where required.
Landscape, Natural Character and Visual Amenity Effects		
Physical and perceptual landscape effects from mining activities.	Effects (particularly during construction and operation) will be managed through design refinement and progressive rehabilitation to integrate final landforms with the surrounding Buller Plateaux landscape.	Review of landform development and rehabilitation performance during operations and post-closure. Residual visual effects are expected to reduce progressively over time, with no to low residual effects anticipated within approximately 10-50 years following mine closure.
Effects on associative landscape values, including historic and	Where loss or modification of historic and archaeological features cannot be avoided, effects will be managed through measures	Ongoing rehabilitation and pest exclusion areas will retain and enhance landscape integrity in the long term.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
archaeological features, and recreation amenity.	outlined in the HHMP (see Historic Heritage and Archaeology section of this table). Mining will result in short-term adverse effects on recreational values due to access restrictions, altered experiential qualities, and visual and noise intrusion.	Progressive rehabilitation and offsets will support restoration of access, with opportunities for enhanced recreation, heritage interpretation and legacy use of roads and infrastructure following mine closure.
Noise and Vibration Effects		
Actual and potential adverse effects from operational noise, including coal handling.	Implement the Noise, Blasting and Vibration Management Plan, including application of best practicable option (BPO) measures at all times. This includes appropriate operation of all equipment, keeping workshop doors closed at night where practicable, replacement of work or defective components, maintenance of mufflers, and lubrication of moving machinery to avoid squeaks and squeals. Routine inspection and ongoing maintenance of mobile plant, equipment and infrastructure to minimise excessive, impulsive, or tonal noise, and to identify and address potential noise sources. Management of operational activities, including scheduling, spatial separation, and zoning of activities, to reduce potential noise effects on nearby sensitive receptors where practicable. Compliance with approved operating hours for relevant activities. Enforcement of on-site speed restrictions to minimise noise from haulage and service vehicles.	Noise compliance monitoring will be undertaken where required to demonstrate compliance: > At representative locations near the nearest relevant sensitive receptors, including residential dwellings at Millerton and Denniston, or at any other locations required to assess compliance at a notional boundary; and > Following receipt of a substantiated noise complaint or where there is a material change in operations, activity location, or equipment that may affect noise emissions and monitoring is required to demonstrate compliance. Monitoring will be conducted by suitably qualified experienced personnel, in accordance with *NZS 6801:2008 Acoustics – Measurement of Environmental Sound* and *NZS 6802:2008 Acoustics – Environmental Noise*, taking into account operational, meteorological, and site conditions at the time of monitoring. Results will be assessed against applicable noise limits and consent conditions. Quality assurance and quality control (QA/QC) measures will be implemented, including calibration and maintenance of

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	Routine monitoring of noise, blasting, and vibration, where required, to verify compliance with applicable standards and consent conditions. Where relevant, assessment and management of helicopter noise (excluding emergency use) in accordance with *NZS 6807:1994 Noise Management and Land Use Planning for Helicopter Landing Areas*.	equipment in accordance with manufacturer specifications and relevant standards[32], use of standardised site-specific procedures, and routine review of monitoring data to confirm compliance and identify trends or anomalies.
Potential adverse effects from blasting noise, airblast and ground vibration (generally expected to be minor at residential receptors).	In accordance with the Noise, Blasting and Vibration Management Plan, the following measures will be implemented to manage blasting and vibration effects: > Conducting blasting within regulated hours; > Controlled blast design, including charge control, timing, and setback distances, to manage airblast and ground vibration effects; > Regular inspection and maintenance of blasting equipment; > Routine blast monitoring, including recording of blast date, time, and duration; and > Advance notification to relevant landholders prior to blasting, where required.	Blasting and vibration compliance monitoring will be undertaken, where required, at the following locations and in the following circumstances: > At or near the boundary of the nearest identified sensitive receptors, including residential dwellings at Millerton and Denniston and any identified sensitive heritage structures; > At locations where additional verification data is required. Blasting and vibration monitoring will: > Measure airblast overpressure and ground vibration, including PPV; > Be undertaken in accordance with Appendix J of *AS 2187.2:2006 Explosives – Storage and Use, Part 2: Use of Explosives*; and

[32] Including *NZS 6801:2008 Acoustics – Measurement of Environmental Sound, NZS 6802:2008 Acoustics – Environmental Noise*, and *AS 2187.2:2006 Explosives – Storage and Use, Part 2: Use of Explosives*.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
		> Use appropriately calibrated equipment operated by trained and competent personnel. Monitoring results will be recorded and assessed against applicable consent limits for human comfort and the protection of sensitive heritage structures.
Transportation (Roading and Traffic) Effects		
Adverse traffic effects during construction and operations.	Mitigation measures will be in accordance with the implementation of the Traffic Management Plan for all construction and operational activities, including: > Coordination of construction movements and deliveries to avoid heavy vehicle clustering where practicable and schedule delivery-intensive activities to avoid peak recreational periods; > Promoting shared transport options (e.g. buses and carpooling) for construction crews where practicable; > Applying site-specific driver protocols, including giving way to school buses, reduced speeds on unsealed roads, and management of vehicle movements to minimise interaction with recreational users of the Denniston Track.	Review traffic performance and respond to complaints or incidents in accordance with the Traffic Management Plan. Adjust scheduling, routing or controls where monitoring identifies recurring or unacceptable traffic effects.
Adverse traffic events during abnormal or unplanned events.	Manage all traffic movements in accordance with the Traffic Management Plan, including: > Monitoring of pavement condition and wear on affected public roads in consultation with NZTA and BDC;	Ongoing liaison with road controlling authorities during and following abnormal events. Reviewing road condition and traffic performance and implementing remedial actions as required.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	> Where events extend beyond a short duration, working with road controlling authorities to agree monitoring, maintenance and repair requirements; and > Repairing any damage to BDC-managed roads attributable to Project traffic and providing advance notification to affected authorities and communities where practicable. Consistent with the Heads of Agreement between Bathurst and BDC, any required maintenance and repair works on affected public roads will be undertaken through agreed procedures between the parties, with Project-related costs funded by Bathurst.	
Abnormal coal haulage via Millerton Road between Stockton and Ngākawau.	Coordinate truck movements to avoid two-way conflicts on narrow sections above the railway crossing. Implement driver communication protocols to reduce the risk of conflicts between trucks and light vehicles, consistent with measures successfully applied during the August 2025 aerial ropeway suspension.	Monitor effectiveness of coordination and communication measures during use of Millerton Road and refine controls if conflicts or safety issues arise.
Increased construction traffic on the Denniston Track.	Install new road markings and signage on Denniston Track at the Denniston Road / Burnetts Face Road / Boswell Street intersection. Maintain and repair the Denniston Track Road pavement to ensure safety for all road users, with an agreed road maintenance and repair plan developed between Bathurst and BDC. A pre-construction road condition survey will be undertaken, and any road upgrades, maintenance and repair works required as a	Monitor road condition and safety performance and review maintenance requirements throughout the construction period. Undertake ongoing road condition monitoring against agreed baseline conditions and implement maintenance and repairs where required.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	consequence of Project traffic will be managed in accordance with the Heads of Agreement between Bathurst and BDC.	
Localised road safety issues at Burnetts Face Road and Whareatea Mine Road	Implement targeted safety improvements, including widening Burnetts Face Road at small-radius curves to achieve a minimum sealed carriageway width of 6.6 m, and widening the Whareatea Mine Road/Burnetts Face Road intersection to allow safe two-way truck movements. Improvements to ensure safety: > Widen Burnetts Face Road at small radius curves between Denniston and Whareatea Mine Road to provide a minimum sealed carriageway width of 6.6 m.	Inspect upgraded sections to confirm safety performance and implement further improvements if required.
Potential adverse impacts due to traffic at ESE.	Prepare and implement a site-specific ESE Traffic Management Plan addressing construction and operational traffic effects.	Monitor traffic performance in accordance with the ESE Traffic Management Plan and apply adaptive management where required.
Lighting Effects		
Adverse lighting effects from mobile lighting towers.	Manage mobile lighting towers in accordance with the approved Lighting and Visual Amenity Management Plan. Towers will be restricted to a maximum height of 12 m, oriented downward and away from residences and public roads where practicable, and used only for the minimum duration required to complete the relevant activity.	Review use, positioning and duration of mobile lighting towers through routine inspections, with adjustments made where unnecessary light spill or nuisance effects are identified.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	The number of towers operating concurrently will be minimised, and towers will be removed or relocated once activities are complete to avoid unnecessary night-time illumination.	
Adverse lighting effects from fixed lighting.	Design and operate fixed lighting in accordance with the Lighting and Visual Amenity Management Plan, limiting lighting to what is required for safety and operations. All fixed luminaires will be directed downward with zero upward tilt, achieve no more than 1% upward light emission (or a maximum of 1,000 candelas in any direction), and be integrated with infrastructure layout to reduce landscape prominence.	Periodic inspection of fixed lighting to confirm compliance with design standards and lighting performance specifications, with refinement where adverse effects are identified.
Potential adverse night-time visual effects in relation to vehicle lighting.	Manage vehicle lighting in accordance with the Lighting and Visual Amenity Management Plan by using dipped headlights on site roads (including the UWHR) where safe to do so, avoiding unnecessary use of high-beam or auxiliary lighting, and prohibiting vehicle-mounted flashing safety lights on public roads.	Review vehicle lighting practices through operational inspections and incident reviews, with corrective actions implemented where effects on amenity are identified.
Waste (including Tyre Storage) Effects		
Potential adverse effects from generation, storage and disposal of general and non-hazardous solid waste.	Managed in accordance with the Waste Management Plan, with a focus on minimising waste generation and maximising reuse and recycling. Waste will be segregated at source, stored in clearly labelled and managed areas to avoid litter, odour and nuisance effects, and removed regularly from site using licensed contractors to approved off-site facilities.	Routine inspections and audits in accordance with the Waste Management Plan to verify compliance and effectiveness of mitigation measures. Investigation of complaints and application of adaptive management, including activation of TARPs where required.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	No general or non-hazardous solid waste will be disposed of to land on site.	
Potential adverse effects associated with storage and management of waste tyres	Management will be in accordance with the Waste Management Plan and associated Waste Tyre Management Procedure. Tyres will only be stored within designated tyre storage areas and designed to comply with NES-STO requirements, including limits on stockpile size, separation distances and fire management risk. Tyres will be tracked, managed and removed from site at end-of-life via approved contractors, including the Tyrewise product stewardship scheme or equivalent recycling options.	Monitoring of tyre storage areas and tyre inventories to confirm compliance with storage and fire-risk requirements. Implementation of TARPs where indicators of increased risk or non-compliance are identified.
Hazardous Substances Effects		
Spills or leaks of hazardous substances during transport, unloading or storage (including fuels, chemicals and corrosive liquids).	Management in accordance with the Hazardous Substances Management Plan, including the following measures: > Transport hazardous substances in accordance with the Land Transport Rule: Dangerous Goods 2005; > Store hazardous liquids in approved, bunded facilities with secondary containment where required; > Move hazardous substances promptly into designed storage areas following delivery; > Locate tanks and storage areas to drain to on-site treatment or containment systems; and	Routine inspections of storage, bunds and drainage systems. Incident reporting and review following any spill or near-miss, with adaptive management where required.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	> Implement Emergency Response Plans, including spill kits and trained personnel.	
Spills during refuelling of equipment or tanks.	Design, test, certify and maintain refuelling systems in accordance with HSW-HS regulations. Implement pre-start checks and refuelling procedures in controlled areas that drain to the on-site network. Use dry-break couplings, overfill protection systems and interlocks where applicable. Maintain spill kits at refuelling locations and ensure staff are trained in spill response.	Inspection of refuelling systems and procedures. Review of spill incidents and activation of Emergency Response Plan where necessary.
Fire or explosion risks associated with flammable liquids, oxidisers and explosives.	Design, test and maintain flammable liquid storage, oxidiser facilities (e.g. ANE, AN Prill) and explosives magazines in accordance with HSW-HS and WorkSafe requirements, including separation distances, lightning protection and restricted access. Prohibit ignition sources and incompatible materials. Maintain small inventories of highly flammable substances. Implement Emergency Management Plans with firefighting and evacuation provisions.	Regular inspections, inventory controls and auditing of hazardous substance facilities. Review emergency preparedness and response arrangements following drills or incidents.
Dust and Air Quality (including GHG) Effects		
Dust arising from vehicle movements on unpaved	Implement the Dust Management Plan, with active use of water carts on trafficked haul routes and working areas during dry	Routine visual monitoring of haul roads and working areas to assess dust and road condition.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
haul roads and working areas.	conditions, including along the main haul routes from Station #2 to Station #5 (aerial ropeway headworks and feed) and the UWHR. Manage vehicle speeds to suit conditions and maintain haul road surfaces to minimise potholes and corrugations that exacerbate dust generation.	Monitoring will be carried out daily during higher-risk months (November-March) and weekly at other times, with corrective actions implemented promptly where excessive dust is observed.
Dust arising from stockpiles, exposed surfaces, excavation, loading, tipping and rehabilitation activities.	Location of stockpiles centrally and set back from sensitive receptors where practicable. Compacting overburden stockpiles to create a crust and minimise wind entrainment. Minimising drop heights, handling damp material where possible, and modifying dozer operations if dust becomes excessive. Progressive rehabilitation, including reshaping, topsoiling and revegetation, will permanently stabilise disturbed areas and eliminate ongoing dust sources.	Monitoring of weather conditions will be undertaken in accordance with the Dust Management Plan, with continuous weather monitoring at multiple on-site meteorological stations to inform operational decisions. Dust deposition monitoring at representative residential, recreational, ecological and background locations, with monthly sample collection and assessment against the MfE (2016) reporting level. Results will be reviewed and additional controls implemented where levels approach or exceed the reporting value, with results also included in annual reporting to the WCRC.
Dust arising from processing plant operations.	Design and operate the processing plant in accordance with the Dust Management Plan, including centralised plant and stockpile location, use of collection hoods on coal breakers, covered conveyors, minimised drop heights and transfer points, selection of least wind-affected stockpiles, and minimisation of coal rehandling.	The complaints procedure for dust-related incidents will be in accordance with the Dust Management Plan, including investigation, corrective action, staff training, auditing and review.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Dust arising from drill and blasting operations.	Pack blast holes with inert material to contain explosive energy and minimise dust ejection. Avoid blasting during temperature inversions or when strong winds are directed towards sensitive receptors, where practicable.	Review blasting practices and environmental conditions during and after blasting events, and modify procedures if dust effects are identified.
Dust arising from rehabilitation.	Rehabilitation is a mitigation measure to control dust. The mined area is progressively reshaped, covered with topsoil and revegetated. This permanently stabilises the surfaces and eliminates it as a dust source.	None.
Effects from GHG emissions.	GHG mitigation and management are embedded in the Project through a range of design and operational measures and through the implementation of Bathurst's Sustainability, Energy Use and GHG Emissions Strategy (2026e). This includes minimising haul distances and road gradients through an optimised mine layout (including use of the UWHR), progressively electrifying infrastructure and suitable vehicles, and reducing emissions through fleet upgrades, investment in lower-emission equipment, and use of biofuels where practicable. Additional measures include participation in supplier sustainability programmes to support adoption of hybrid and electrified machinery, maintaining infrastructure to avoid embodied emissions, optimising maintenance and fuel efficiency, backfilling to reduce haulage emissions, and investigating alternative reagents (such as magnesium oxide) to reduce process-related CO_2 emissions.	Monitoring and future actions focus on improving emissions understanding, enhancing long-term carbon outcomes, and supporting adaptive management over the life of the Project. This includes active management and improved quantification of fugitive coal seam methane emissions through planned drilling and gas monitoring to develop site-specific emission factors, alongside ongoing review of emissions performance through corporate and Project-specific reporting over the life of the Project, with periodic updates to reduction and mitigation strategies. The Project also incorporates progressive rehabilitation, VDT, and establishment of permanent forestry to increase carbon sequestration, supporting ongoing emissions offsetting and continuous environmental performance improvement.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Historic Heritage and Archaeological Effects		
Modification or destruction of archaeological sites.	A general Heritage NZ Archaeological Authority will be applied for under Section 44 of the HNZPT Act to cover all aspects of the BPCP in relation to pre-1900 archaeological sites. The Archaeological Management Plan will be implemented to manage potential archaeological effects to pre-1900s sites, including: > Pre-commencement requirements; > Earthworks phase requirements; > Procedures to follow if archaeological sites are exposed when the Project Archaeologist is not present; > Protocols relating to kōiwi tangata (human remains); > Protocols relating to Māori artefacts (taonga tūturu); and > Post-earthworks phase requirements. All archaeological work will be undertaken by, or under the supervision of, a suitably qualified Archaeologist.	
Modification or destruction of heritage sites.	All works will be undertaken in accordance with the Historic Heritage Management Plan (HHMP), including pre-construction survey and recording, archaeological monitoring where required, accidental discovery protocols, and procedures for the recording, retrieval, analysis and custodianship of archaeological and heritage material.	> To address residual and cumulative effects on heritage values, Bathurst has committed to establishing and administering a Historic Heritage Enhancement Fund to support future conservation, interpretation, documentation, public access and education initiatives across the wider Denniston and Stockton heritage landscape.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	The HHMP also provides for physical protection and exclusion measures around retained features near disturbance areas, engagement with a Project Archaeologist, and annual monitoring of selected heritage features in proximity to active works. A Heritage Stakeholders Group will provide a structured forum for communication with heritage agencies, iwi, local museums and heritage organisations throughout the life of the Project.	> The HHMP also anticipates ongoing dissemination of new heritage information and research results to Heritage New Zealand, DOC, councils, Te Rūnanga o Ngāti Waewae, local archives and heritage organisations, together with annual reporting on archaeological work and artefact management. > Potential enhancement initiatives include oral history projects, improved public interpretation, support for local museums and archives, conservation of selected heritage features, and restoration or enhancement of public access to heritage areas following mining.
Adverse effects on historic heritage at Stockton.	Effects will be managed in accordance with the relevant proposed consent conditions and the HHMP, including: > Pre-commencement protocols; > Construction and operational phase protocols; and > Closure phase protocols.	Bathurst has committed to residual effects funding for future Denniston historic enhancement work. Recommended additional initiatives for future historic enhancement work include: > Support the development and maintenance of an additional heritage recreation opportunity offsite. Re-establishing public access from the west to historic mining and milling sites at Charming Creek would appear to be an immediate priority; > The completion of the outstanding Final Authority report on archaeological work at Mine Creek Settlement and Infrastructure site (L28/17) required under condition of Archaeological Authority No 2009/327, including one article detailing an aspect of the results of the investigation prepared to a professional standard of publication; and

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
		> The retention and custodianship of artefacts recovered during archaeological work at Mine Creek Settlement and Infrastructure site (Lw8/17) will be finalised in consultation with Bathurst, the Northern Buller Museum Granity (items from Stockton) and Kawatiri Westport Museum (where appropriate).
Adverse effects on historic heritage at ESE.	Effects will be managed in accordance with the relevant proposed consent conditions and the HHMP, including: > Pre-commencement protocols; > Construction and operational phase protocols; and > Closure protocols.	Bathurst has committed to establishing and administering a Historic Heritage Enhancement Fund for future Denniston historic enhancement work. Recommended additional initiatives for future historic access work include: > Ongoing management of high priority items identified in the Denniston Conservation Plan (e.g. re-establishing public access to the Banbury Mine portal); > Historic management and developed public access to additional areas of the Denniston Plateau (e.g. areas within the Denniston settlement) that highlight, preserve and interpret the social history of the plateau, such as the bowling green, bath house, dam and tennis court; > Oral history recording and the development of a Denniston Plateau Sound Trail or geo-located audio tour of historic mining sites and areas to enhance the visitor experience to the Denniston Plateau Historic Area. > Cleaning up of the Sullivan Mine site, conservation work on the winder (possibly the construction of a roof) and mine tubs,

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
		and development of track network to allow visitation during and after mining.
Adverse effects on historic heritage at MFS.	Effects will be managed in accordance with the relevant proposed consent conditions and the HHMP, including: > Pre-commencement protocols; > Construction and operational phase protocols; and > Closure protocols.	Bathurst has committed to residual effects funding for future Denniston historic enhancement work. Recommended additional initiatives for future historic enhancement work include: > Ongoing levels of management of high priority items identified in the Denniston Conservation Plan (e.g. re-establishing public access to the Banbury Mine portal); > Historic management and public access to additional areas of the Denniston Plateau (e.g. Koranui Incline, Iron Bridge Mine, Kiwi Mine and Deep Creek Mine); > Further research of the Taipo Mine (and the associated Iron Bridge, Kiwi and Deep Creek Mines), particularly oral history and the examination of mining records in Archives New Zealand and Westport Coal Company material at the Hocken Library; and > Funding for oral history recording and the development of a Denniston Plateau Sound Trail or geo-located audio tour of historic mining sites and areas to enhance the visitor experience to the Denniston Plateau Historic Area.
Adverse effects on historic heritage at UWHR.	Effects will be managed in accordance with the relevant proposed consent conditions, and the HHMP, including: > Pre-commencement protocols;	

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	> Constructional and operational phase protocols; and > Completion phase protocols. The UWHR has also been designed to avoid impacting on all the historic features and archaeological sites within the Heritage NZ Listed Area and TTPP scheduled – Denniston Historic Area, including extensive and significant early settlement and coal mining remains at Burnetts Face and Coalbrookdale and the main surface remains of the Iron Mine Bridge and Kiwi Mine.	
Recreation, Tourism and Public Access Effects		
Displacement or restriction of recreation opportunities on the Denniston Plateau (including Mount Rochfort, Mackley Track and associated trails).	Establish a Recreation Users Group ("**RUG**") comprising representatives of recreation interests (e.g. mountain biking, trail running, walking, four-wheel driving, heritage tourism), land managers (DOC, LINZ) and Bathurst. The RUG will provide ongoing input into recreation and tourism management, staging of access restrictions, rehabilitation opportunities, and communication with users throughout the LOM. The Recreational Enhancement Fund will provide a mechanism to support recreational projects and opportunities within the Buller Plateaux and surrounding areas where appropriate.	Ongoing engagement with the RUG, with issues, recommendations and agreed management responses recorded and reviewed periodically. Periodic independent recreation reviews and visitor surveys will be undertaken to assess recreation use patterns, access arrangements and future recreation opportunities over time.
Reduced or modified 4WD and motorised access to Mount Rochfort and the	Maintained managed 4WD access to Mount Rochfort and the Mackley Track through ongoing liaison with the NZ Four Wheel Drive Association and the Combined 4WD Clubs Inc.	Review access arrangements through the RUG and liaise with 4WD clubs.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Mackley Track during mining.	Establish a minimum number of public and club access days annually, with the ability to apply for additional event-based access. Provide clear online information on access protocols, safety requirements and approvals.	Consider enabling a commercial 4WD operation, consistent with existing arrangements (e.g. Outwest Tours).
Effects on walking, cycling and trail running access across the UWHR area.	Provide marked pedestrian crossings where walking tracks intersect the UWHR (e.g. Myra's Track to Mount William). Maintain walking and cycling access to the Mackley Track by constructing a shared path parallel to the UWHR with clearly marked crossings, signage and information.	Monitor use of crossings and shared paths. Review safety performance and user feedback and refine crossings, signage or management measures as required.
Short-term safety effects on recreational users during blasting and other high-risk activities.	Manage blasting effects on publicly accessible areas (e.g. Coalbrookdale Walk) through temporary access closures, warning signage, advance notification and exclusion zones in accordance with Bathurst safety procedures. Schedule blasting to avoid peak recreation periods where practicable.	None.
Reduced recreational amenity due to altered access, perception of industrial activity or limited information.	Provide online and on-site information about remaining recreation opportunities, access restrictions, alternative routes, and safety requirements. Improve wayfinding and interpretation signage, including promotion of heritage values and unaffected trails. Maintain access to established tracks within the Coalbrookdale pest exclusion area.	Periodic review of signage, online information and user understanding through the RUG and visitor feedback mechanisms.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Residual displacement of walking, cycling and trail-based recreation from the Mount Rochfort area.	Support and deliver off-site recreational enhancement initiatives, including development or enhancement of alternative regional recreation opportunities, where appropriate, to address temporary displacement of trail-based recreation. Collaborate with DOC and community groups to identify suitable opportunities.	Review uptake and effectiveness of off-site recreation options through periodic assessment of recreation patterns and user feedback.
Rehabilitation / Post-Closure Effects		
Failure to achieve intended rehabilitation and closure outcomes (including ecological, landform and water management outcomes).	Implement the RMP to deliver progressive rehabilitation and closure, including creation of stable landforms, reinstatement of streams and riparian margins, establishment of self-sustaining indigenous ecosystems, and construction of wetland and tarn habitats where appropriate. Rehabilitation will be undertaken in accordance with defined ecosystem targets (including forest, shrubland, pākihi, wetland, tarn and rockfield habitats) and quantified closure criteria (such as indigenous vegetation cover, species richness, weed thresholds and habitat attributes). A prioritised rehabilitation methodology will be applied, including VDT, salvage and reuse of soils and vegetation, and planting of locally sourced indigenous species, with rehabilitation integrated into mine planning to minimise the area of open disturbance at any one time. Integrate rehabilitation with landform design and water management to reduce erosion, sediment generation and AMD risks and support long-term site stability and ecological function.	Undertake long-term monitoring of landform stability, water quality, vegetation establishment, wetland extent, reinstated streams and fauna habitat outcomes against defined RMP closure criteria until those criteria are achieved. Implement permanent, stratified monitoring plots and outcome-based ecological monitoring to assess vegetation cover, species composition, ecosystem function and weed presence. Use annual rehabilitation work plans, monitoring reports and adaptive management processes to refine methods where outcomes are not tracking as intended, and to confirm progressive achievement of closure outcomes.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Risk of Bathurst defaulting on its obligations.	Implement the Conceptual Mine Closure Strategy, RMP and associated bond framework so that closure obligations are progressively planned, funded and capable of being completed under all circumstances.	Undertake bond reviews and reporting. Provide for regulatory oversight and the ability for bonds to be called upon to complete closure and rehabilitation works if required.