

Ngākawau Operational Environmental Management Plan

August 2026

STO-ENV-PLN-029 Rev0

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Glossary of Terms and Abbreviations

Term	Definition
ACML	Ancillary Coal Mining Licence
AEO	Authority to Enter and Operate
ANZECC	Australian and New Zealand Environment and Conservation Council
AS/NZS	Australian Standard/New Zealand Standard
ARMCANZ	Agriculture and Resource Management Council of Australia and New Zealand
AWP	Annual Work Plan
Bathurst	Bathurst Resources Limited, including its subsidiary companies BT Mining Ltd, Bathurst Coal Ltd, and Buller Coal Ltd
BDC	Buller District Council
BDP	Buller District Plan
BPCP	Buller Plateaux Continuation Project
BCZ	Buller Coalfield Zone
Buller Plateaux	A collective reference to the Stockton Plateau and Denniston Plateau
CML	Coal Mining Licence
dB	Decibels
DOC	Department of Conservation
EMS	Environmental Management System
FTAA	Fast-track Approvals Act 2024
HSEC	Health, Safety, Environment, and Community
K	Kelvin, measures the colour appearance of light
km	Kilometres
LAeq	A weighted equivalent continuous sound level
LDP	Leading Design Professionals
Lux	Standard unit of measurement of light level intensity
MP	Mining Permit
Ngākawau Facilities	The Ngākawau Rail Loadout Facility and the associated Aerial Ropeway
NOEMP	Ngākawau Operational Environmental Management Plan
QA/QC	Quality assurance and quality control
SEMP	Site Environmental Management Plan
SEP	Stakeholder Engagement Plan
TARP	Trigger Action Response Plan
The Project	The Buller Plateaux Continuation Project
TTPP	Te Tai o Poutini Plan
UV	Ultraviolet
UWHR	Upper Waimangaroa Haul Road (a Project sub-area)
WCRC	West Coast Regional Council

1.0 Introduction

1.1 Purpose

Bathurst Resources Limited (including its subsidiary companies BT Mining Ltd, Bathurst Coal Ltd, Buller Coal Ltd, and joint venture BT Mining Ltd) (Bathurst) are seeking approvals through the Fast-track Approvals Act 2024 (FTAA) for the Buller Plateaux Continuation Project (BPCP, or the Project).

This Ngākawau Operational Environmental Management Plan (also referred to as the “Plan”, or NOEMP) outlines the objectives, risks, management controls, responsibilities, and training requirements to effectively manage environmental effects associated with the operation of the Ngākawau Rail Loadout Facility and the associated Aerial Ropeway (collectively referred to as “the Ngākawau Facilities”). These facilities form part of the existing coal transport and export infrastructure supporting the Project.

The Ngākawau Facilities are long-established and currently operate under existing approvals. The BPCP does not propose new infrastructure at Ngākawau, rather, it provides for the continuation of existing operations in support of ongoing mining activities on the Buller Plateaux. Accordingly, this Plan documents existing management practices and applies them consistently to support continued compliance as operations continue under the FTAA.

This Plan focuses on those environmental effects that are directly relevant to, and potentially influenced by, the operation of the Ngākawau Facilities, namely water, air (dust), noise, and lighting effects. Other environmental aspects associated with the wider Project (such as traffic, hazardous substances, ecology, land disturbance, waste and rehabilitation) are managed through separate management plans prepared under the Site Environmental Management Plan (SEMP) framework and are not duplicated in this Plan.

This Plan is intended to be a practical operational document for relevant site personnel, contractors, and management, and is to be implemented alongside Bathurst’s broader SEMP and support procedures.

This Plan has been prepared in accordance with the recommendations from the following assessments:

- *BPCP, Existing Infrastructure - Assessment of Environmental Effects – Lighting*, by Leading Design Professionals (LDP), 2026;
- *BPCP Assessment of Noise Effects*, by Marshall Day Acoustics, 2026; and
- *BPCP Air Quality Assessment of Effects*, by Tonkin and Taylor, 2026.

For the purposes of this Plan, a material change refers to changes in activity type, location, equipment, scale, or operating hours that have the potential to alter environmental effects (e.g. noise, dust, or lighting).

A consolidated summary of commitments made under this Plan, including monitoring, management, reporting, and review obligations, is provided in **Attachment 1**.

1.2 Objectives

The objectives of this Plan are to:

- Avoid or minimise water, air, noise, and lighting related effects arising from operation of the Ngākawau Aerial Ropeway and Rail Loadout facilities;
- Set out measures to achieve compliance with applicable water, air, noise, and lighting related limits and requirements related to the operation of the Ngākawau Aerial Ropeway and Rail Loadout facilities specified in relevant consents; and
- Avoid adverse water, air, noise, and lighting-related effects on adjoining properties, infrastructure and identified sensitive receptors.

2.0 Project Description

2.1 Overview

Bathurst is a publicly listed New Zealand coal mining company with a focus on people and long-term environmental sustainability. Bathurst is New Zealand's largest coal mining company, who proposes to mine approximately 20 million tonnes of coal over a 25-year period as part of the Project.

The Project is located on the Stockton Plateau and the Denniston Plateau (collectively referred to as the Buller Plateaux), approximately 15 kilometres (km) northeast of Westport on the West Coast of the South Island.

The Project area includes a combination of Bathurst-owned land, Crown land, and private land, and encompasses both existing and proposed mining areas. Mining activities currently occur within several Coal Mining Licence (CML), Mining Permit (MP), and ancillary coal mining licence (ACML) boundaries that collectively define the operational footprint of the Project.

The proposed Project consent boundary is shown in Figure 1.

2.2 Operations

The Project involves coal extraction across multiple operational areas on the Stockton and Denniston Plateaux, linked by the Upper Waimangaroa Haul Road (UWHR), which enables coal and equipment to be transported from Denniston to Stockton for processing. Mining activities are undertaken on a continuous basis, and include coal extraction, overburden removal, material placement, rehabilitation works, coal transportation and routine maintenance of haul roads and infrastructure.

Coal extracted from the Buller Plateaux is processed and transported using existing infrastructure, including the Ngākawau Rail Loadout and associated aerial ropeway, which enable the transfer of coal from the mine sites to the national rail network.

The Project represents the continuation and spatial extension of existing operations.

2.3 Ngākawau Facilities Overview

The Ngākawau Facilities form a critical component of the Project's coal handling and transport chain, enabling processed coal from the Buller Plateaux to be conveyed via the aerial ropeway and loaded onto rail for transport to off-site export markets.

No new buildings or facilities are proposed at Ngākawau as part of the Project. Ongoing operations will continue to be supported by existing infrastructure, with activities generally consistent with current operational practices.

The Ngākawau Facilities are shown in Figure 2.

2.3.1 Ngākawau Aerial Ropeway

The Ngākawau Aerial Ropeway commences near the Stockton mine gate and extends approximately 2.3 km to the Ngākawau Rail Loadout. The ropeway operates as part of established mine infrastructure and is used to convey coal between 7am and 1am, five (5) days a week. This can change depending on coal production requirements and rail scheduling which could be up to 24 hours seven (7) days a week.

Vehicle access along the ropeway corridor is required for inspection, maintenance, and operational support. Minor earthworks may be undertaken from time to time to maintain access or to support tower and rope maintenance activities.

2.3.2 Ngākawau Rail Loadout

The Ngākawau Rail Loadout forms part of the Project's coal handling and transport chain, receiving coal via the Ngākawau Aerial Ropeway for stockpiling and loading onto trains for transport via rail to the export facilities at Lyttelton Port near Christchurch. A layout of the Ngākawau Rail Loadout is shown in Figure 3.

The Ngākawau Rail Loadout typically operates up to 18 hours per day, Monday to Friday, and loads approximately 19 trains per week. Late-night or other out-of-hours train loading may be required, dependent on KiwiRail scheduling, and may extend beyond midnight on some occasions. Train loading normally occurs between 8 am and 9 pm Monday to Friday, with each train taking approximately 90 minutes to load. A limited amount of shunting is involved.

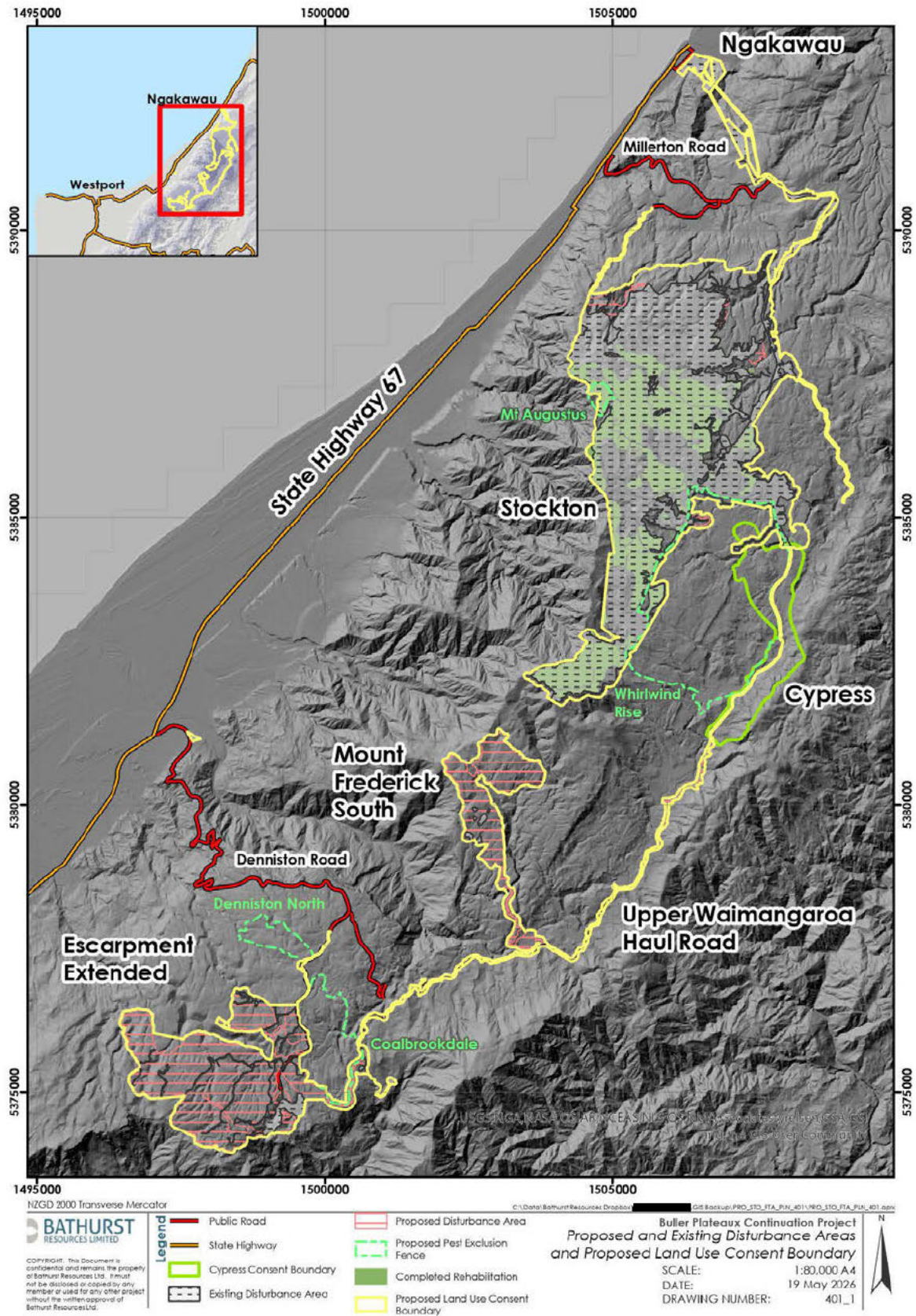


Figure 1: Proposed and Existing Disturbance Areas and Proposed Land Use Consent Boundary for the Project

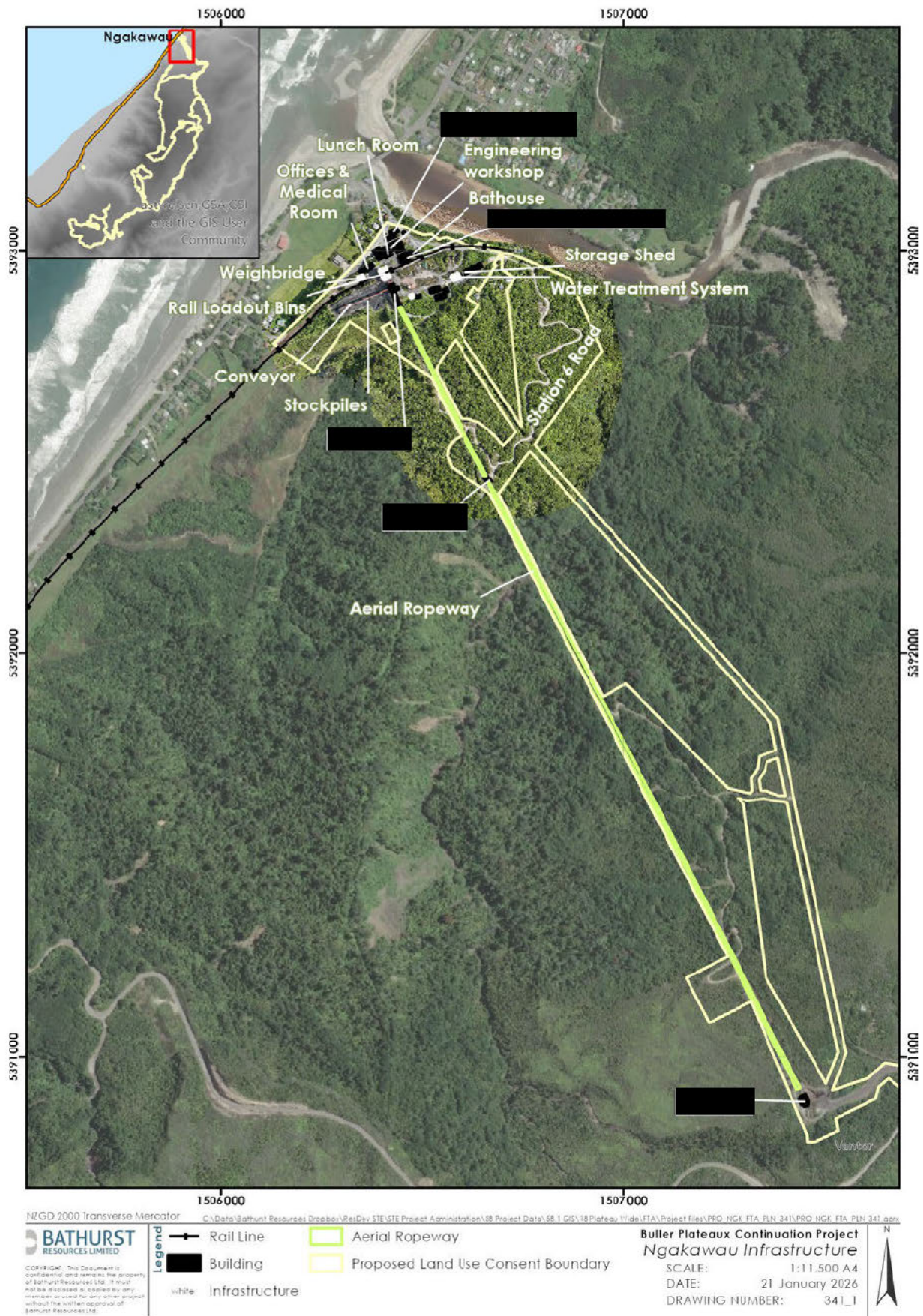
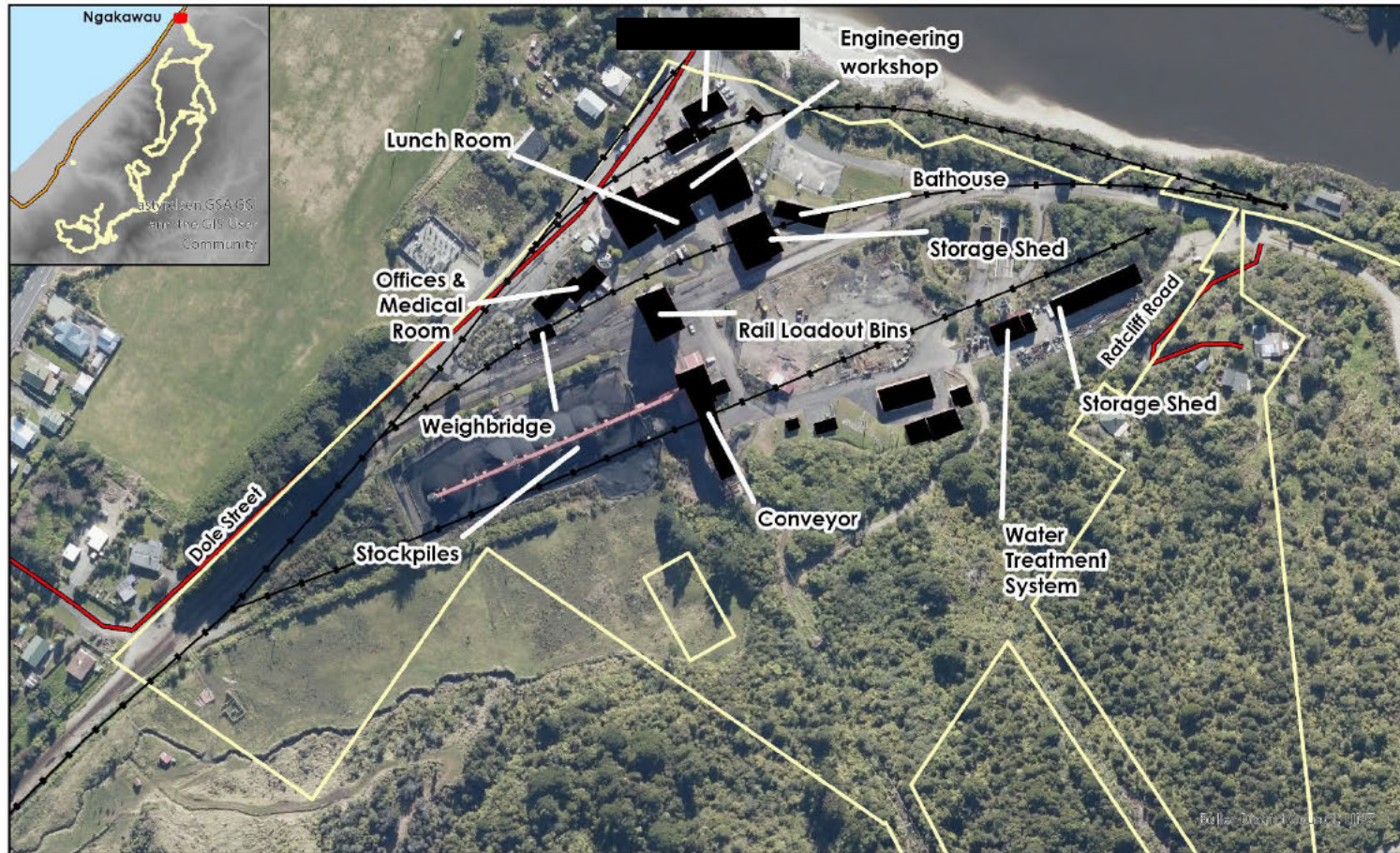


Figure 2: Ngākawau Facilities



11/2020 Transverse Mercator

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- Legend**
- Public Road
 - +— Rail Line
 - Building Footprint
 - Proposed Land Use Consent Boundary

Buller Plateaux Continuation Project
Ngākawau Rail Loadout Facility
SCALE: 1:2,616 A4
DATE: 30 March 2026
DRAWING NUMBER: 072_4



Figure 3: Ngākawau Rail Loadout

3.0 Environmental Setting

3.1 Receiving Environment

The Ngākawau Facilities are located within the small coastal settlement Ngākawau on the West Coast of New Zealand's South Island, where the Ngākawau River discharges to the Tasman Sea. The surrounding environment comprises coastal and forested landscapes, established mining and rail infrastructure, conservation land, and residential development within the township.

Land use in the area reflects the long-standing presence of coal mining and rail transport. Environmental conditions are influenced by high rainfall, coastal winds, and proximity to the marine environment. The Ngākawau Facilities have operated since at least the 1950s and form part of the established receiving environment.

3.2 Sensitive Receptors

Sensitive receptors in the vicinity of the Ngākawau Facilities include residential dwellings, community areas, and locations where people may experience amenity effects from operational activities.

The closest residential receptors are located within the Ngākawau township, including dwellings along Dole Street and Ratcliff Road near the Ngākawau Rail Loadout and railway corridor (as shown in Figure 3). These receptors have been identified and considered in the development of management, mitigation, and monitoring measures under this Plan.

3.3 Existing Environment

3.3.1 Water

The Ngākawau River is the primary surface water feature descending from the Glasgow Range upstream, discharging to the Tasman Sea north of the Ngākawau Facilities. Water quality reflects a combination of natural conditions and historical mining influences within the catchment and supports aquatic habitat and recreational use. The coastal setting is characterised by high rainfall and salt spray typical of the West Coast.

The Ngākawau Facilities interact with the local water environment through both water take and controlled discharge activities associated with coal handling and loadout operations. A small volume of water is abstracted from a nearby stream for operational purposes such as dust suppression, in accordance with Resource Consent RC01104.

Stormwater and process water generated from coal handling areas, stockpiles, and operational surfaces are collected and directed to on-site treatment systems, including settling infrastructure and a lamella treatment system, prior to discharge to the Ngākawau River.

These interactions are managed to minimise sediment and contaminant discharge, maintain water quality in the receiving environment, and achieve compliance with applicable consent conditions.

3.3.2 Air Quality and Dust

Air quality in Ngākawau is generally influenced by coastal winds, low-intensity urban activity and intermittent industrial activity. Localised dust sources include coal handling, stockpiling, vehicle movements, and rail loading operations, particularly during dry, windy conditions. Prevailing winds typically provide effective dispersion, with dust effects generally short-term and localised. Separate to mineral dust created from Ngākawau operations, organic dust impacts have also been recorded at monitoring locations, with the main contribution suspected to be from grass mowing activities at the nearby park.

3.3.3 Noise

The existing noise environment at Ngākawau comprises natural coastal sounds (including surf and birdlife), local traffic noise, and industrial noise associated with the Ngākawau Facilities. The closest and most sensitive residential receptors are dwellings on Dole Street and Ratcliff Road. These locations may experience noticeable noise effects during periods of late-night train loading. At other times, night noise remains below 45 decibels (dB) LAeq¹, and other nearby properties meet applicable project noise limits. Residents are accustomed to the soundscape given the long history of coal operations in the area.

Mining and processing operations on the Buller Plateaux are sufficiently distant from Ngākawau that their noise contribution to the township is negligible.

3.3.4 Lighting

Ngākawau has limited residential street lighting, generally of low intensity and consistent with the scale of the settlement. The Ngākawau Aerial Ropeway is unlit, with industrial lighting concentrated at the Ngākawau Rail Loadout where lighting is used for operational and safety purposes during morning, evening, and night-time activities.

Light spill from the Ngākawau Rail Loadout toward residential properties is limited due to fixture placement, shielding, and intervening vegetation, although operational lighting is visible from some nearby dwellings and public roads. The baseline lighting measurements undertaken as part of the *BPCP Existing Infrastructure – Lighting Assessment* (LDP, 2025) identified a maximum light spill of 1.4 lux² at the nearest residential boundary on Dole Street. This is well within the Operative Buller District Plan (BDP) 10 lux limit, and glare effects were assessed as low and unlikely to distract motorists. Under the Te Tai o Poutini Plan (TPPP) permitted activity boundary limits (where applicable), the night-time limit is 1 lux between 10:00pm and 7:00am. The measured light level at the Dole Street boundary marginally exceeds this night-time limit. However, light levels at dwelling windows are expected to remain low due to the orientation and shielding of lighting fixtures, separation distance to receptors, and intervening vegetation, and are consistent with AS/NZS 4282:2023 guidance for residential amenity.

¹ LAeq is the A-weighted equivalent continuous sound level and represents the energy-averaged noise level over the measurement period.

² Lux is a unit of illuminance that measures the amount of visible light falling on a surface, to quantify light spill at sensitive receptors.

4.0 Statutory Requirements

This Plan has been prepared to address the statutory requirements relevant to Ngākawau facilities, specifically water, air, noise, and lighting effects, to support the FTAA application.

This Plan identifies the applicable legal framework, consent requirements, and standards and guidelines relevant to the management of effects during Project operations.

4.1 Legal Framework and Consent Requirements

The Ngākawau Facilities operate under existing resource consents granted by the West Coast Regional Council (WCRC) under the *Resource Management Act 1991*, which authorise water take and discharge activities associated with the coal handling facility.

Resource Consent RC01104 was granted in 2004 for a duration of 35 years and authorises the abstraction of water from a local creek for operational purposes (including dust suppression), and the discharge of treated and untreated stormwater from the Ngākawau Coal Handling Facility to the Ngākawau River (coastal marine area). The consent includes conditions relating to water treatment, discharge quality, monitoring, reporting, and the management of environmental effects.

RC01104 will remain in place for the Ngākawau Facilities. As part of the BPCP, additional conditions are proposed under the Fast-track Approvals Act 2024 to address environmental effects associated with the continuation of operations.

This Plan has been prepared to support compliance with both the existing RC01104 conditions and the proposed FTAA conditions applicable to the Ngākawau Facilities, as presented in Table 1.

Table 1: Consent conditions relevant to this Plan

Condition	Condition Description	Referenced in Plan

Consent conditions to be inserted upon issue of the final decision.

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4.2 Standards and Guidelines

The standards and guidelines relevant to the management of water, air, noise, and lighting related effects associated with the Ngākawau Facilities are summarised in Table 2. These documents provide the technical framework for measurement, assessment, risk management, and implementation of mitigation measures under this Plan.

Table 2: Standards and guidelines relevant to this Plan

Standard/Guideline	Relevance
BDP	The Ngākawau Rail Loadout is located within an Industrial zone, with adjacent areas zoned Rural and General Rural. The BDP includes provisions relevant to noise, lighting, and other operational effects associated with industrial activities.
TTPP	The combined district plan for the Buller, Grey and Westland districts. It sets objectives, policies, rules, and methods to manage land use activities, including provisions relating to outdoor artificial lighting and noise. The Ngākawau Facilities are zoned under the Buller Coalfield Zone (BCZ) under the TTPP. The lighting provisions applicable to outdoor artificial lighting are those presented in LIGHT-R1 and (where applicable) LIGHT-R4 and LIGHT-R6, which set permitted activity boundary limits (by zone) and require measurement and assessment in accordance with AS/NZS 4282:2023. For rural / coalfield-type zones (including the BCZ where relevant), LIGHT-R4 sets boundary limits of 5 lux (7.00am–10.00pm) and 1 lux (10.00pm–7.00am). Where permitted activity standards are not met, LIGHT-R6 applies (restricted discretionary), including consideration of operational need and the use of measures in a Light Management Plan.
Australian Standard / New Zealand Standard (AS/NZS) 3580.10.1 Methods for Sampling and Analysis of Ambient Air – Gravimetric determination of deposited particulate matter for depositional dust monitoring	Provides standardised methods for the sampling and analysis of ambient air, specifically for the measurement of deposited particulate matter (dust). This standard supports the monitoring of dust deposition associated with coal handling and operational activities at the Ngākawau Facilities and enables assessment of compliance with relevant dust management objectives and environmental performance criteria.
AS/NZS 4282:2023 Control of the Obtrusive Effects of Outdoor Lighting	Provides guidance on the design, placement, and management of outdoor lighting to control light spill, glare, and obtrusive effects, particularly in proximity to residential areas and public roads. This standard supports assessment and management of lighting effects at the Ngākawau Facilities.
NZS 6801:2008 Acoustics – Measurement of Environmental Sound	Defines quantities and procedures for measuring environmental sound in community environments. This standard provides the basis for noise monitoring undertaken to assess operational noise effects from the Ngākawau Facilities.
NZS 6802:2008 Acoustics – Environmental Noise	Sets out procedures for assessing compliance with noise limits and provides guidance for the assessment and management of environmental noise effects from industrial activities.
ANZECC³ & ARMCANZ⁴ (2000) Australian and New Zealand Guidelines for Fresh and Marine Water Quality Water Quality Guidelines	Provides guideline values for the protection of freshwater and marine water quality. Relevant as supporting guidance for managing stormwater discharges from the Ngākawau facilities, where consent conditions reference the protection of receiving environments.

³ ANZECC = Australian and New Zealand Environment and Conservation Council.

⁴ ARMCANZ = Agriculture and Resource Management Council of Australia and New Zealand.

5.0 Stakeholder Consultation

A draft of this management plan was supplied to relevant regulators as part of the FTAA pre-consultation engagement.

The stakeholder consultation regarding associated technical reports and this management plan has been summarised in the Stakeholder Consultation section of the BPCP FTAA main application.

Once this management plan is approved, this section will document all future stakeholder engagement undertaken for subsequent versions.

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6.0 Management Approach

This section outlines the risk-based approach adopted by Bathurst to manage water, air, noise, and lighting related effects associated with the Ngākawau Facilities. The approach integrates existing operational practices, consent requirements, monitoring, and management responses to minimise adverse effects and achieve compliance.

Risk management is undertaken in accordance with the Bathurst Health, Safety, Environment, and Community (HSEC) Framework and the *Bathurst-HST-STD-001 Risk Management Standard*.

6.1 Sources and Effects

Environmental risks associated with the operation of the Ngākawau Facilities arise from established coal handling, transport, and loadout activities and will continue as part of the ongoing operation of existing infrastructure. The nature of activities, operating hours, and sources of potential effects remain consistent with current operations.

The key sources of water, air (dust), noise, and lighting effects and their associated potential environmental effects under this Plan are summarised in Table 3.

Table 3: Ngākawau key risks

Source (caused by)	Potential effect (risk)
Water	
Stormwater runoff from coal handling areas, stockpiles, and hardstand surfaces, lamella discharge water, dust suppression water and runoff from operational activities	- Discharge of sediment or contaminants to the Ngākawau River; - Degradation of receiving water quality; - Effects on aquatic habitats; and/or - Non-compliance with consent conditions.
Air (Dust)	
Coal handling, stockpiling, coal transfer activities, vehicle movements, and rail loadout activities associated with the Ngākawau Facilities, particularly during dry or windy conditions, where dust may be generated if not appropriately controlled.	- Dust deposition on nearby properties; - Reduced local air quality; - Community and landowner complaints; and/or - Exceedance of consent air (dust) criteria.
Noise	
Operation of conveyors, loaders, rail loading equipment, and associated vehicle movements	- Elevated noise levels, particularly during night-time operations;⁵ - Exceedance of consent noise criteria; and/or - Community complaints and amenity effects.
Rail movements and limited shunting activities	Short-term noise events affecting nearby residential receivers.

⁵ Where train loadout extends into the early night-time period, elevated noise levels may occur at a small number of dwellings. These effects are associated with established operations, and nearby residents are familiar with the existing sound environment.

Source (caused by)	Potential effect (risk)
Lighting	
Use of fixed and mobile outdoor lighting for operational and safety purposes	• Localised visibility of operational lighting from nearby dwellings and public roads (notably Dole Street) if not appropriately oriented/shielded; • Potential for minor light spill exceedance at a residential boundary under proposed TTPP permitted standards (where applicable), while maintaining low levels at dwelling windows consistent with AS/NZS 4282:2023; • Potential for sky glow effects and increased visibility of lighting from wider viewpoints, particularly under low cloud or coastal weather conditions; and/or • Reduced night-time amenity if not appropriately managed.

6.2 Mitigation and Management Measures

Water, air (dust), noise, and lighting effects associated with the Ngākawau Facilities will be managed through a combination of established operational controls, monitoring, inspection, and response procedures. Mitigation measures are focused on managing effects at the source, as well as through treatment, monitoring, and responsive management measures, controlling the timing and location of activities, and responding to issues should they arise.

6.2.1 Water

Water related effects are managed through existing stormwater infrastructure, treatment systems, and operational controls at the Ngākawau Facilities, designed and operated to manage runoff from operational areas, minimise the risk of sediment or contaminants entering the Ngākawau River, and achieve compliance with applicable consent conditions.

Water management measures include:

- Maintenance of stormwater management infrastructure, including drains, sediment controls, settling infrastructure, and the on-site lamella water treatment system;
- Treatment of stormwater and process water via the lamella system and associated settling processes prior to discharge to the Ngākawau River;
- Collection and direction of contaminated stormwater from coal handling and operational areas to the treatment system, with clean water diverted away from operational areas where practicable;
- Routine inspections of stormwater controls and treatment systems, including inspections before and after significant rainfall events;
- Prompt maintenance or repair of stormwater and treatment infrastructure where issues are identified;
- Water quality management through operation of the lamella treatment system to control turbidity and suspended solids;

- Reuse and recycling of treated water within the site where practicable to minimise discharge volumes;
- Management of coal handling areas and operational surfaces to minimise accumulation and mobilisation of coal fines into the stormwater system;
- Staff awareness and training in environmental protection practices relevant to water quality management; and
- Procedures to respond to plant failures, system malfunctions, or other events that could result in a breach of consent conditions, including immediate investigation, implementation of corrective actions, and notification in accordance with the Trigger Action Response Plan (TARP) (see Section 8.0).

Water treatment will be managed to ensure that discharges contain only suspended sediments, coal fines, and approved water treatment chemicals (including poly aluminium chloride), unless otherwise authorised. Any proposed change to water treatment chemicals will be notified to the consent authority in writing prior to implementation, including details of chemical composition, storage, dosing systems, and application rates. Water treatment chemicals, fuels, and other hazardous substances will be stored and managed within appropriately bunded and contained areas to prevent spills or uncontrolled discharge to the stormwater system. Refer to *BPCP-ENV-PLN-014 Hazardous Substances Management Plan* for further details. All treatment chemicals will be stored, handled, and applied in accordance with manufacturer specifications. Notification of any change in water treatment chemicals may result in a review of consent conditions in accordance with Section 128 of the Resource Management Act.

Sludge and coal fines accumulated within the treatment system (including settlement tanks, lamella units, and any associated polishing infrastructure) will be removed as required to maintain effective system performance. Records will be maintained of sludge and fines removal, including volumes, dates, and disposal methods. Collected sludge and coal fines will be managed and disposed of within approved on-site facilities in accordance with site procedures and regulatory requirements, consistent with established water treatment practices across the wider Stockton operations.

Discharges from the Ngākawau Facilities will be managed to ensure that, at or beyond 200 metres from the point of discharge, there are no:

- Conspicuous oil or grease films, scums, foams, or floatable materials;
- Conspicuous changes in colour or visual clarity;
- Objectionable odour; or
- Significant adverse effects on aquatic life.

The consent authority will be notified prior to undertaking any modifications or changes to water intake structures or associated water take facilities.

Water quality monitoring is undertaken in accordance with consent requirements and existing monitoring programmes. Additional monitoring or inspections may be initiated in response to complaints, incidents, or identified elevated risk.

6.2.2 Air Quality and Dust

The primary potential source of dust generation at the Ngākawau Rail Loadout is the outdoor coal stockpile area, where coal delivered via the Ngākawau Aerial Ropeway is stored prior to rail loadout. In contrast, coal unloading from the ropeway and loading to rail wagons is undertaken within buildings, which significantly reduces dust generation from these activities. Dust may also be generated during coal handling, stockpiling, transfer, vehicle movements, rail wagon loading and rail departure if not appropriately controlled.

The Ngākawau Facilities will be managed and operated so that discharges of particulate matter to air do not cause offensive or objectionable effects beyond the boundary of the consented area identified in the relevant consent plan.

Sensitive receptors relevant to dust management are identified in Section 3.2.

Dust management at the Ngākawau Rail Loadout is achieved through a combination of engineered controls, operational practices, and routine inspections, including:

- Coal stockpile management, with concrete nib walls and wind mesh fencing installed to reduce wind speeds across the stockpile area;
- Water-based dust suppression, including:
 - Fixed low-level and high-level irrigator sprays located around the stockpile perimeter, within the stockpile area and at the weighbridge;
 - Gantry conveyor sprays to dampen coal prior to stockpiling;
 - Conveyor, chute, and air-ring boom sprays to dampen coal during loading to rail wagons;
 - Water-based suppression (e.g. boom sprays) applied to loaded wagons prior to departure, where required, to minimise dust during rail transport.
- Vehicle and road dust controls, including:
 - Sealed internal roads and grassed areas where traffic, facilities, or storage occur;
 - A site-wide vehicle speed limit of 15 km per hour;
 - Roadside sprays and automated irrigators used to dampen and wash down road surfaces as required;
- Load management, with truck and trailer loads covered prior to departure if there is a need for coal to be transported via road; and
- No modifications will be made to coal storage, handling, or loadout facilities that may increase dust generation without prior approval from the consent authority, where required under applicable consents.

Dust monitoring is undertaken in accordance with consent requirements and existing monitoring programmes. Additional monitoring or inspections may be initiated in response to complaints or identified elevated risk. Mineralogical analysis of dust samples may be conducted where initial depositional dust gauge results are above the relevant reporting level, in order to understand the proportion of dust attributable to the Ngākawau Facilities compared with external sources.

6.2.3 Noise

Noise effects from the Ngākawau Facilities are managed through operational controls, equipment maintenance, and monitoring to minimise effects on nearby sensitive receivers, particularly during night-time activities.

Noise management measures include:

- Application of the best practicable option (BPO) at all times to minimise noise generation, including, but not limited to:
 - Appropriate operation of all equipment;
 - Replacement of worn or defective components;
 - Maintenance of mufflers; and
 - Lubrication of moving machinery to avoid squeaks and squeals;
- Operating in accordance with relevant district noise standards and applicable consent requirements;
- Keeping workshop doors closed at night as far as practicable;
- Prohibiting tonal reversing alarms on Ngākawau site vehicles and equipment, and where reversing alarms are required, using broadband (white noise) reversing alarms or visual warning devices;
- Enforcing on-site speed restrictions to minimise noise from vehicle and train movements, with train speeds limited to walking pace within operational areas;
- Limiting operational zones and activity locations where practicable to contain noise within controlled areas;
- Providing staff training and awareness on noise minimisation practices relevant to their activities; and
- Routine site inspections to confirm noise controls are being implemented and equipment is operating as intended.

Attended noise monitoring is undertaken where required by consent conditions, or in response to substantiated complaints or identified elevated risk, to assess compliance with applicable noise limits and inform management responses.

6.2.4 Lighting

Lighting at the Ngākawau Facilities will be managed to comply with the BDP and TTPP lighting provisions (with the exception of the Dole Street receiver as noted in Section 3.3.4) through the implementation of the following management practices:

- Minimising the number of light sources to those required for safe operations;
- Using directional lighting and shielding so lights are angled downward and focused on work areas;
- Maintaining floodlights in a downward tilt so that the primary beam is not directly visible from nearby dwellings or public roads;
- Maintaining and, where practicable, optimising shielding and orientation of luminaires on the side of the Rail Loadout facing Dole Street to minimise boundary light spill;
- Use of lighting consistent with AS/NZS 4282:2023 to manage glare and obtrusive lighting effects;
- Encouraging lights to be switched off when not required, where safe to do so;
- Undertaking routine inspections and maintenance of lighting infrastructure to support ongoing performance and confirm continued compliance with applicable boundary limits;
- Ensuring any mobile lighting towers are not directed toward residential properties or public roads and do not exceed a height of 12 m;
- Avoiding use of light sources that emit ultraviolet (UV) and blue/green spectrum light, with preference given to warmer spectrum lighting, including warm-white lighting (≤ 2700 Kelvin (K)) where practicable, without compromising safety and operational requirements; and
- Fixed lighting will be selected and installed so that no more than 1% of light is emitted above the horizontal, or alternatively that maximum luminous intensity does not exceed 1,000 candelas in any direction.

7.0 Monitoring

Monitoring is undertaken to verify compliance with consent conditions, assess the effectiveness of mitigation and management measures, and provide early identification of potential water, air (dust), noise, or lighting issues at the Ngākawau Facilities. Monitoring outcomes inform operational decision-making and, where relevant, activation of the TARP.

Monitoring is implemented in accordance with applicable consent conditions (see Section 4.1), relevant standards (see Section 4.2), and Bathurst's established monitoring procedures.

7.1 Compliance Monitoring

7.1.1 Water

Water quality monitoring is undertaken to manage stormwater and process water discharges from the Ngākawau Facilities and to minimise the potential for sediment or contaminant discharge to the Ngākawau River.

Stormwater and process water from the Ngākawau Facilities is treated via the on-site lamella water treatment system and associated settling infrastructure prior to discharge at monitoring point S32B and entry into the Ngākawau River (as shown in Figure 4).

Water quality monitoring will be undertaken in accordance with Table 4 and comprises a combination of discrete sampling and continuous monitoring to assess treatment system performance and discharge water quality.

Monthly discrete sampling will, where practicable, be undertaken during or within three hours following a rainfall event exceeding one hour in duration. A minimum of 12 samples will be collected during each annual monitoring period, with intervals between samples not exceeding six weeks.

Continuous telemetry-based monitoring of turbidity and pH will be undertaken over a defined six-week period annually to support early identification of emerging issues and assess treatment system performance under higher-risk conditions. Monitoring periods will be rotated across different months over time where practicable.

Continuous monitoring equipment will record data at intervals not exceeding 10 minutes and will be calibrated prior to the commencement of each monitoring period and rechecked or recalibrated approximately three weeks after commencement. A minimum of two discrete samples will be collected during each continuous monitoring period.

Rainfall during the previous 24-hour period will be recorded at the time of discrete sampling, and rainfall will be recorded daily during periods of continuous monitoring.

Monitoring results are reviewed by site personnel to confirm effective operation of the treatment system and to inform inspections, maintenance, or corrective actions where required. Visual

inspections of the Ngākawau River in the vicinity of the discharge are also undertaken during routine site activities to identify any observable changes in water clarity.

Table 4: Water quality monitoring requirements

Monitoring Site	Parameters	Frequency	Compliance limits		
			10-sample rolling median	92 nd Percentile Limit	Lower Limit
S32B	pH	Monthly – discrete sampling	-	-	>4
	Total Suspended Solids		50 g/m ³	150 g/m ³	-
	Turbidity		75 NTU	250 NTU	-
			Mean over sampling period	95 th Percentile Limit	
	Turbidity	Continuous for a 6-week period per annum – telemetered.	120 NTU	300 NTU	

Notes:

NTU = Nephelometric Turbidity Unit

g/m³ = grams per cubic metre.

7.1.2 Air Quality and Dust

Dust monitoring is undertaken to manage and control dust emissions from the Ngākawau Facilities, assess potential off-site dust deposition effects on nearby sensitive receptors, and verify the effectiveness of dust mitigation measures.

Compliance monitoring is undertaken using dust deposition gauges installed at representative locations surrounding the Ngākawau Facilities, including nearby residential and community areas, as shown in Figure 4. Dust deposition monitoring is undertaken in accordance with Table 5, with additional monitoring undertaken during the summer season where dust emission potential is elevated, or in response to complaints, elevated monitoring results, observed dust generation, adverse weather conditions, or identified elevated risk.

Dust deposition monitoring results will be assessed against the reporting level set out in Table 5. Exceedance of the reporting level will be managed in accordance with the TARP in Section 8.0.

Table 5: Dust monitoring requirements

Monitoring Site	Parameters	Frequency	Reporting level
WA – Charming Creek Car Park	Depositional dust levels	30-day period*	4 g/m ² / 30 days above background levels
WB – Ngākawau Rugby Field			
WC – Dole Street			

Notes:

*give or take two (2) days in accordance with AS/NZS 3580.10.1 Gravimetric method for deposited matter.

g/m² = grams per square metre.

The reporting level is assessed as 4 g/m²/30 days above background dust deposition levels.

Background dust levels for the purpose of assessing the reporting level will be determined using the 'WR Dust' monitoring site. The WR Dust site is located away from Ngākawau dust generating activities and is considered representative of background conditions (as shown in Figure 4).

Dust samples are analysed by a suitably qualified and accredited laboratory (e.g. SGS or equivalent). Monitoring results are reviewed by site personnel to assess the reporting level, identify trends, and inform the implementation of dust management controls where required. Monitoring results are reported externally where required in accordance with consent conditions.

7.1.2.1 Meteorological monitoring

Meteorological monitoring will be maintained at the Ngākawau Facilities for the duration of the relevant air discharge consent, at the monitoring station shown in Figure 4. Monitoring will include, as a minimum, wind speed, wind direction and rainfall.

Meteorological data will be recorded continuously with date and time stamps. Meteorological data will be reviewed, where relevant, to inform dust management responses, investigation of elevated dust deposition results, assessment of dust complaints, and implementation of corrective actions.

Meteorological monitoring data will be made available to WCRC within 10 working days upon request.

7.1.3 Noise

Noise monitoring will be undertaken where required to demonstrate compliance with applicable noise limits, including:

- At representative locations near the closest residential receptors, including dwellings along Dole Street and Ratcliff Road near the Ngākawau Rail Loadout and railway corridor, or at any other locations required to assess compliance at a notional boundary;
- Following receipt of a substantiated noise complaint; or
- Where there is a material change in operations (including changes to activity type, location, equipment, or operating hours) that may affect noise emissions, and monitoring is required to demonstrate compliance.

Noise compliance monitoring will:

- Be conducted by suitably qualified and experienced personnel;
- Be undertaken in accordance with NZS 6801:2008 Acoustics – Measurement of Environmental Sound and NZS 6802:2008 Acoustics – Environmental Noise; and
- Consider operational, meteorological, and site conditions at the time of monitoring.

Where attended noise monitoring is undertaken, the monitoring locations, parameters, and assessment criteria will be consistent with those set out in Table 6.

Table 6: Noise monitoring requirements

Monitoring Site	Frequency	Parameters	Criteria
Dwellings along Dole Street and Ratcliff Road, or any other locations required to assess compliance at a notional boundary	As required to demonstrate compliance	Daytime noise levels 0700 to 2200 hrs	55 dB LAeq
		Night-time noise levels 2200 to 0700 hrs	45 dB LAeq and 75 dB LAFmax

Notes:

LAeq = equivalent continuous sound level.

LAFmax = maximum A-weighted fast time-weighted sound level.

7.1.4 Lighting

Lighting monitoring will be undertaken where required to demonstrate compliance with applicable lighting limits, including:

- At representative locations near the closest residential receptors, including dwellings along Dole Street and Ratcliff Road near the Ngākawau Rail Loadout and railway corridor, or at any other locations required to assess compliance at a notional boundary;
- Following receipt of a substantiated complaint relating to light spill or glare from the Ngākawau Facilities; or
- Where there is a material change in lighting infrastructure, configuration, or operational use that may affect lighting effects at adjacent properties or public roads and monitoring is required to confirm compliance.

Where monitoring is required, lighting assessments will:

- Be conducted by suitably qualified and experienced personnel; and
- Be undertaken in accordance with applicable district planning provisions and relevant standards, including AS/NZS 4282:2023 – Control of the Obtrusive Effects of Outdoor Lighting, having regard to both boundary limits and (where relevant) light levels at dwelling windows, as well as fixture orientation, shielding, and operational conditions at the time of assessment.

Where lighting monitoring is undertaken, the monitoring locations, parameters, and assessment criteria will be consistent with those set out in Table 7.

Table 7: Lighting monitoring requirements

Monitoring Site	Frequency	Parameters	Criteria
Dwellings along Dole Street and Ratcliff Road, or any other locations required to assess compliance at a notional boundary	As required to demonstrate compliance	Vertical and/or horizontal illuminance (lux), glare observations	• BDP: 10 lux (day or night) measured 2 m inside the adjoining site boundary; • TTPP (where applicable by zone/activity status): 5 lux between 7 am and 10 pm and 1 lux between 10 pm and 7 am at the site boundary; and • Assessment to be undertaken in accordance with AS/NZS 4282:2023.

Notes:

Lux = a unit of measurement for illuminance, representing the amount of visible light falling on a surface.

Where required, measurements may also be undertaken at the closest window of an adjoining dwelling in accordance with AS/NZS 4282:2023 guidance.



Figure 4: Ngākawau Water and Air (Dust) Monitoring Locations

7.2 Routine Inspection

Routine inspections support the proactive management of water, air, noise, and lighting related effects at the Ngākawau Facilities.

Inspections will be conducted by suitably qualified Bathurst personnel and will:

- Identify water, dust, noise, and lighting generating activities;
- Confirm implementation of mitigation measures in accordance with this Plan, including that dust suppression measures are operational where relevant; and
- Identify conditions or activities that may increase the risk of adverse water, air (dust), noise, and lighting effects.

Inspections findings will be communicated to site personnel through toolbox talks or other appropriate forums. Additional inspections may be undertaken in response to changes in activities, adverse weather conditions, elevated monitoring results, observed dust generation, incidents, or substantiated community complaints.

7.3 Quality Assurance and Quality Control

Bathurst will implement quality assurance and quality control (QA/QC) measures to support the accuracy, reliability, and consistency of monitoring undertaken for the Project. These include:

- Collection, preservation, and analysis of water samples in accordance with standard methods for the examination of water and wastewater, or equivalent recognised methodologies;
- Calibration and maintenance of monitoring equipment in accordance with manufacturer specifications and relevant standards, including:
 - NZS 6801:2008 Acoustics – Measurement of Environmental Sound, NZS 6802:2008 Acoustics – Environmental Noise for noise monitoring equipment;
 - AS/NZS 4282:2023 Control of the Obtrusive Effects of Outdoor Lighting for lighting assessments for lighting monitoring equipment;
 - Relevant water quality guidance (including ANZECC & ARM CANZ, 2000) for stormwater and discharge monitoring for water monitoring equipment; and
 - AS/NZS 3580.10.1 Methods for Sampling and Analysis of Ambient Air – Gravimetric determination of deposited particulate matter for depositional dust monitoring.
- Monitoring undertaken by trained and competent personnel using standardised, site-specific procedures appropriate to each monitoring type; and
- Maintenance and review of monitoring records, including site conditions, calibration information, laboratory reports, and instrument settings, to support compliance assessment and identify trends or anomalies.

8.0 Trigger Action Response, Incidents and Complaints Management

This Plan is supported by a TARP that provides a structured, risk-based framework for responding to monitoring results, operational observations, incidents, and community complaints relating to the operation of the Ngākawau Facilities. The TARP supports timely identification and management of risks by linking issues to proportionate response actions and integrates with Bathurst's existing incident and complaints management systems.

Triggers for response may arise from routine inspections or operational observations, incidents or near-misses, exceedance of an applicable consent limit, criterion or reporting level, or community complaints.

Response actions are implemented in accordance with the trigger levels and actions set out in Table 8.

Table 8: Trigger Action Response Plan (TARP)

Trigger	Action
Level 1 - Observation or Minor Issue	
Measured or observed water, air (dust), noise, or lighting indicators approaching applicable consent limits, criteria or reporting levels, or minor, short-term deviations from typical operating conditions with potential to increase effects (e.g. elevated turbidity, elevated noise levels, noticeable light spill).	• Increase frequency or extent of monitoring or inspections, as appropriate. • Review current operations, including equipment use, activity timing, material handling, or lighting configuration. • Implement minor operational adjustments to maintain a buffer to applicable consent limits, criteria or reporting levels (e.g. modify equipment use, adjust dust suppression, re-orient lighting or modify activity timing). • Notify relevant site management and environmental personnel. • Document findings, actions taken and outcomes.
Level 2 - Repeated Issue or Substantiated Complaint	
Repeated Level 1 triggers, substantiated complaints, elevated dust deposition results, or monitoring/inspection outcomes indicating potential exceedance of applicable limits, criteria or reporting levels for water quality, dust, noise, or lighting, and/or increasing risk to residential receivers, the Ngākawau River, or other sensitive receptors.	• Implement immediate corrective actions to reduce effects (e.g. modify or suspend specific activities, increase dust suppression, adjust lighting, undertake equipment maintenance and/or adjust water treatment as relevant). • Undertake targeted compliance monitoring or inspections to confirm effectiveness of corrective measures. • Investigate the cause of the issue, including review of relevant operational information, site conditions, monitoring results and meteorological conditions where relevant. • Notify relevant internal management and, where required by consent conditions or regulatory direction, notify the appropriate regulator and/or affected stakeholders; and • Document corrective actions, implementation timeframes and outcomes.

Trigger	Action
Level 3 - Significant Incident	
A significant issue, including a confirmed non-compliance, exceedance of a consent limit or reporting level requiring regulatory notification, or material adverse effects on sensitive receptors, community amenity, or the receiving environment.	• Cease or restrict the relevant activity that is causing the level 3 trigger, once identified, where necessary to prevent further effects. • Implement emergency or incident response procedures in accordance with site systems. • Notify regulators and affected stakeholders where required by consent conditions or regulatory direction. • Undertake a detailed investigation and review of management measures, including revision of operational controls, mitigation measures, or monitoring requirements. • Document outcomes, corrective actions taken, and timeframes for implementation, and make records available to the relevant regulator upon request where required by consent conditions. Additional mitigation will be implemented before activities recommence where required.

8.1 Complaints Management

Bathurst will maintain a Community Complaints Register to record all complaints relating to water, air (dust), noise, or lighting associated with the Ngākawau Facilities.

Bathurst will maintain a 24-hour contact number for receiving complaints relating to water, air/dust, noise or lighting associated with the Ngākawau Facilities. For dust complaints relating to activities authorised by the air discharge consent, the 24-hour contact number will be published on Bathurst's public website and provided in writing to WCRC and to any person who requests it.

In the event of a complaint, Bathurst will:

- Acknowledge receipt of the complaint within two (2) working days;
- Investigate the complaint and undertake a site inspection where appropriate within two (2) working days;
- Review relevant operational information, monitoring results and meteorological conditions, where relevant;
- Implement corrective actions where non-compliance, ineffective controls, or poor practice is identified;
- Document investigation outcomes and communicate findings to the complainant; and
- Assess whether activation of the TARP is required.

The Community Complaints Register will record, as relevant:

- The date and time the complaint was received;
- The nature of the complaint;
- The location of the alleged effect;
- The activity or operation that may have contributed to the complaint;
- Meteorological conditions at the time of the alleged discharge, where relevant;
- The results of the investigation, including any identified dust sources;
- Corrective actions taken;

- Communication with the complainant; and
- Any communication with WCRC or other regulators.

For dust complaints relating to activities authorised by the air discharge consent, Bathurst will provide WCRC with a copy of the complaint record within 10 working days of receiving the complaint.

8.2 Incident Management

Incidents relating to water, air, noise, or lighting associated with the Ngākawau Facilities include events where monitoring results, observations, or complaints indicate a significant exceedance, unplanned impact, or potential non-compliance, or exceedance of an applicable consent limit, criterion or reporting level.

Incidents will be managed in accordance with Bathurst's incident management procedures and the TARP. Where required, responses may include:

- Operational changes or cessation of activities;
- Implementation of corrective and preventive actions;
- Additional monitoring and/or inspections to confirm corrective and/or preventative actions are effective;
- Investigation of the cause of the incident or exceedance, including review of relevant operational information, monitoring results and meteorological conditions where relevant;
- Notification to regulators; and
- Internal investigation to identify root causes and prevent recurrence.

Records of incidents, complaints, monitoring results, and response actions will be maintained in accordance with the SEMP. Corrective actions and implementation timeframes will be recorded and made available to the relevant regulator upon request where required by consent conditions.

8.3 Non-compliances

In the event of any known breach of compliance of the conditions of consent, the consent holder shall notify the consent authority within 48 hours of the breach being detected. Within five (5) days of any known breach, the consent holder shall provide written notification to the consent authority, which explains the cause of the breach and if the cause was within the control of the consent holder, steps which were taken to remedy the breach, and steps which will be taken to prevent any future occurrence of the breach.

9.0 Adaptive Management

Adaptive management is used to support the ongoing effectiveness of water, air, noise, and lighting controls over the life of the Project.

Information from compliance monitoring, routine inspections, complaints, and incident responses will be reviewed to identify opportunities for improvement. Where necessary, management measures may be refined or adjusted in response to:

- Changes in activities or construction methods;
- Monitoring results or observed trends;
- Community complaints or stakeholder feedback; or
- Identified non-compliance or emerging risks.

Feedback from monthly inspections and monitoring outcomes will be communicated to site personnel through toolbox talks or other appropriate forums to reinforce good practice and influence staff behaviour. Where required, additional inspections will be undertaken to verify the effectiveness of revised controls.

10.0 Reporting

Reporting is undertaken to document monitoring outcomes, demonstrate compliance with applicable consent conditions, and support the ongoing environmental management of water, air, noise, and lighting related effects associated with the Ngākawau Facilities. Reporting in accordance with this Plan is proportionate to the scale and nature of monitoring undertaken and is aligned with the risk-based monitoring framework set out in Section 7.0.

10.1 Internal Reporting

Where monitoring of water, air, noise, and lighting is undertaken, monitoring results and inspection findings will be compiled and reported internally through Bathurst's Environmental Management System (EMS) Management Review Process, generally on a 12-monthly basis.

The Environmental Manager is responsible for scheduling the EMS Management Review and reporting performance against the objectives of this Plan (refer to Section 1.2), having regard to:

- Monitoring undertaken during the reporting period;
- Routine inspection findings;
- Complaints and incident records; and
- Any corrective or preventative actions implemented.

All actual or potential non-compliance with this Plan identified through inspections, monitoring, incidents, or complaints will be recorded and managed in accordance with the SEMP. This includes recording non-compliances, corrective actions, assigned responsibilities, and planned and actual completion dates. Community complaints are recorded in the Community Complaints Register and managed in accordance with the Complaints Management Procedure.

10.2 External Reporting

External reporting will be undertaken where required by consent conditions, regulatory direction, or the FTAA. This may include:

- Submission of monitoring results where monitoring is required by consent conditions;
- Reporting of non-compliant monitoring results, exceedances, or elevated risk in accordance with consent conditions, including notification of any breach within 48 hours of detection and provision of written details within five (5) days;
- Written notification to WCRC within 10 working days of receiving laboratory results where dust deposition monitoring exceeds the reporting level set out in Section 7.1.2, including the monitoring site, result, prevailing meteorological conditions during the sampling period, and any likely cause;
- Provision of dust complaint records to WCRC within 10 working days of receiving a dust complaint, where required by the air discharge consent;

- Provision of meteorological monitoring data to WCRC within 10 working days upon request;
- Inclusion of monitoring outcomes in required annual reporting; and
- Any other reporting or notification required by the relevant regulatory authority.

10.2.1 Monthly Reporting

Where monitoring is required under applicable consent conditions, monitoring results will be reported to the WCRC at monthly intervals.

10.2.2 Annual Work Plan

Prior to undertaking any activities on site, and annually thereafter, BRL shall provide an Annual Work Plan (AWP) to the relevant regulatory authorities.

10.2.3 Annual Monitoring Report

Bathurst will prepare and submit an Annual Monitoring Report two months prior to the expiry of the AWP, or as otherwise required by applicable consent conditions. The monitoring period will generally cover 12 months from April to March to allow for the compilation of monitoring data and preparation of the report for submission prior to the expiry of the AWP. Initially, the reporting period may differ depending on the commencement date of monitoring activities.

Where monitoring has been undertaken during the reporting period, management activities and associated monitoring results will be documented and reported in the Annual Monitoring Report in accordance with applicable consent conditions. The report will, where relevant:

- Summarise and present monitoring data, including statistical analysis and graphical representation;
- Identify trends and compare results with previous monitoring periods;
- Include rainfall and other relevant meteorological data, including wind speed and wind direction where relevant to dust monitoring, elevated dust deposition results, or complaints;
- Describe operational changes, maintenance activities, or improvements that may influence environmental performance, including sludge and fines removal from the treatment system and any changes to dust mitigation measures;
- Identify and discuss any non-compliances, exceedances, elevated dust deposition results, or operational difficulties and the measures implemented to address them;
- Summarise complaints received and actions taken in response;
- Provide commentary on the effectiveness of mitigation measures and any proposed improvements; and
- Document any material changes Bathurst intends to initiate to activities or management measures, including indicative timeframes.

11.0 Roles, Responsibilities, and Training

Effective implementation of this Plan relies on clearly defined roles, responsibilities, and appropriate training for all personnel involved in Project activities. Bathurst is committed to ensuring that all staff, employees, and contractors understand their responsibilities in managing water, air (dust), noise and lighting effects and are aware of the processes for monitoring, response, and escalation.

Responsibilities under this Plan support the management pathway whereby monitoring and observations identify potential issues, triggers are assessed, the TARP is activated where required, and appropriate responses and escalation are implemented.

11.1 Roles and Responsibilities

Key roles and responsibilities associated with this Plan are outlined in Table 9.

Table 9: Responsible personnel and tasks

Position	Accountable Task
Site Senior Executive (SSE) / General Manager (GM)	- Overall accountability for implementation of this Plan; - Provides adequate resources for water, air, noise, and lighting related monitoring and mitigation at Ngākawau; - Maintains oversight of operational performance in relation to water, air, noise, and lighting related effects; and - Endorses significant management responses where required.
Environmental Manager	- Primarily responsible for implementation and administration of this Plan; - Coordinates monitoring in accordance with this Plan, including dust deposition and meteorological monitoring where required; - Reviews monitoring results, inspection findings, and complaints relevant to this Plan, including elevated dust deposition results where relevant; - Oversees implementation of mitigation measures, management responses, investigations and corrective actions where required; - Manages internal and external reporting obligations in accordance with this Plan, including provision of monitoring data and complaint records to WCRC where required by consent conditions; - Reviews monitoring results, inspections and/or community complaints to determine the relevant trigger levels under the TARP; - Coordinates review and update of this Plan, including submission to WCRC for certification where required; and - Develops training material for the Mine Induction Package relating to the requirements for water, air/dust, noise and lighting management.
Ngākawau Fixed Plant Manager	- Responsibility for day-to-day operations being undertaken in accordance with the mitigation and management measures set out in this Plan; - Identify and respond to operational activities that may contribute to water, air, noise, and lighting related effects; - Report any exceedances, incidents, or complaints to the Environmental Manager; - Daily visual checks of the site to confirm dust control requirements and that all necessary dust suppression measures are operational and being implemented, including sprays, irrigators, road controls and stockpile controls; - Implement corrective actions as directed; and

Position	Accountable Task
	Respond to observed dust generation, adverse weather conditions, ineffective dust controls, or complaints by implementing corrective actions in accordance with this Plan and the TARP.
All personnel	- Comply with the Ngākawau procedures and controls relevant to water, air (dust), noise, and lighting management. - Report any water, air (dust), noise, and lighting related issues, complaints, incidents, or ineffective controls to their supervisor. - Participate in inductions and toolbox talks relevant to the requirements of this Plan.

11.2 Training and Inductions

Water, air, noise and lighting management requirements associated with the Ngākawau Facilities will be included in the Mine Induction Package and induction process for relevant personnel.

Ongoing environmental awareness training will be delivered through toolbox talks and other appropriate forums. Toolbox talks will address, as required:

- Mitigation measures and good practice;
- Monitoring outcomes and trends;
- Complaints or incidents and lessons learned; and
- Changes to activities, controls, or response procedures.

This training reinforces the link between monitoring outcomes, trigger identification, and appropriate operational responses under the TARP.

12.0 Document Management

This Plan forms part of the SEMP and will be managed in accordance with *BRL-HST-STD-003 Document Control Standard*. This Plan will be reviewed three (3) yearly or:

- Following any major operational change at the Ngākawau Facilities;
- Following receipt of substantiated complaints relating to water, air (dust), noise or lighting;
- Following significant incidents or non-compliance;
- At the request of the regulator.

Where updates are required to this Plan, the updated Plan will be submitted to WCRC for certification where required by consent conditions. WCRC's certification role is limited to determining whether the Plan gives effect to the conditions of consent.

The certified Plan will be implemented and maintained for the duration of the relevant consent. In the event of any inconsistency between this Plan and the conditions of consent, the conditions of consent prevail.

12.1 Change Register

This Plan is issued, revised, and amended under the authorisation of the SSE/GM. Controlled electronic copies will be available to all workers, and a signed hard copy will be maintained in the Westport document library.

Reasons for changes will be documented in the document management table (see Table 10). Superseded versions will be retained for record purposes and marked as obsolete. Each revised version will be issued with a unique version number and date to prevent the use of outdated documents.

Table 10: Document management

Revision History:			
Date	Version No.	Lead Author	Contributing Authors
19/08/2026	Rev0	IEMA	Bathurst
Version No.:	Detail / Changes:		
Rev0	Issued version.		
Next Planned Review:			

13.0 References

- *Bathurst Resources Limited (2025). Buller Plateaux Continuation Project – Project Description (Draft V4)*
- *BPCP Air Quality Assessment of Effects, Tonkin and Taylor, 2026*
- *BPCP Assessment of Noise Effects, Marshall Day, 2026*
- *BPCP Existing Infrastructure – Stockton and Ngākawau, Assessment of Environmental Effects – Lighting, by Leading Design Professionals (LDP), 2026*
- *Buller District Plan, Buller District Council, 2011. <https://bullerdc.govt.nz/planning/district-plan/>*
- *Te Tai o Poutini Plan (Proposed), West Coast Regional Council, 2023*

DRAFT

Attachment 1: Summary of Commitments

Commitment ID	Commitment	Section Reference

Summary of Commitments to be inserted upon issue of the final decision.

DRAFT