



Social Impact Assessment

Buller Plateaux Continuation Project Fast Track Approval Act Application

Prepared for

Bathurst Resources Limited



BT Mining Ltd



May 2026

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26 May 2026



Executive Summary

Introduction

1. This report presents a Social Impact Assessment (SIA) addressing the regional and national effects of the Buller Plateaux Continuation Project (BPCP), proposed by BT Mining Limited and Bathurst Resources Limited [BRL] (as joint venture partners), and BRL's subsidiary companies, Bathurst Coal Ltd and Buller Coal Ltd. All of these entities are collectively referred to as 'Bathurst' in this report. The Project is located in the West Coast Regional Council (WCRC) and Buller District Council (BDC) areas.
2. The SIA has been prepared as part of a Fast Track Approvals Act (FTAA) application, and forms part of the Assessment of Environmental Effects (AEE) for the Project. The purpose of the FTAA is to '*facilitate the delivery of infrastructure and development projects with significant regional or national benefits*'.

Purpose and scope of SIA

3. Schedule 5, Clause 7(a) of the Fast-track Approvals Act 2024 requires an assessment of an activity in relation to:
 - a. Any effect on the people in the neighbourhood, and, if relevant, the wider community, including any social, economic or cultural effects¹.
 - b. Any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations².
 - c. Any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations³.
4. The SIA also has reference to Section 5(2) of the *Resource Management Act 1991* which defines the purpose of that Act, i.e. sustainable management, as being, *inter alia*, the 'use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety. . . '.
5. Accordingly, the purpose of the SIA is to assist with answering the following questions:
 - a. Whether or not the Project will generate significant regional or national social benefits⁴ and if so, what is the nature⁵ of those benefits?
 - b. What will be the social impacts of the Project on people in the neighbourhood, and if relevant, the wider community?⁶

¹ FTAA Schedule 5, 7(a).

² FTAA Schedule 5, 7(d).

³ FTAA Schedule 5, 7(g).

⁴ The facilitation and delivering of projects with regional or national benefits is the purpose of the FTAA and is core consideration of the necessary assessment by the Expert Panel.

⁵ Section 81(4), FTAA.

⁶ Schedule 5, clause 7(a), which states the requirements of an assessment of an application to be determined by an Expert Panel.



- c. Whether the adverse impacts are sufficiently significant to be out of proportion to the Project's regional or national benefits?⁷
6. The SIA is one of the various expert reports that are contributing towards the consolidated Assessment of Environmental Effects (AEE) for the Project. Those other reports assess adverse effects that themselves entail social impact elements, and likewise those reports propose mitigation and other positive measures that could be assessed resulting in positive social benefit. It is important to ensure that the adverse and positive social impacts are not double counted by being included in this SIA and in those other reports. Aigis Group has received advice that this approach of avoiding such 'double-counting' is consistent with Expert Panel interpretations issued to date under the FTAA.
7. The identified social benefits of the Project:
 - a. Are assessed against a counterfactual (alternative or 'base' case) of mining ceasing on the Buller Plateaux by 31 March 2027, as described in Section 1.1.
 - b. Address countervailing effects and benefits that arise from the Project that are not identified and assessed as adverse impacts in other specialist technical assessments forming parts of the AEE.
8. The SIA reports and assesses the social impacts relating to the effects identified in the technical reports. The social impacts identified and addresses in this SIA are *not additive* to the impacts identified in technical reports but represent stakeholder and community views on the potential effects of those impacts on them.
9. There are economic impacts closely associated with the potential social impacts identified in this SIA. Accordingly, the SIA should be read together with the Economic Impact Assessment (EIA) that has also been prepared by Aigis Group.

Summary Project description

10. The Project will enable approximately 20 million tonnes of export coal to be extracted from the various sites across the Buller Plateaux, with 96% of the coal to be used in steelmaking (metallurgical or 'coking' coal), and the balance sold as thermal coal for energy production. The BPCP comprises:
 - a. **Stockton:** Comprising the existing Stockton Mine, two proposed pest exclusion fenced areas and includes the Ngakawau Rail Loadout and associated Aerial Ropeway;
 - b. **Escarpment Extended:** Opencast mining with a combination of existing opencast pit (Escarpment), mining old underground workings (Whareatea) and an extension into unworked areas (Whareatea West);
 - c. **Mount Frederick South:** A new opencast mining area with initial mining through old underground workings;
 - d. **Upper Waimangaroa Haul Road:** The road connecting the Stockton Mine with the Mount Frederick South and Escarpment Extended operations; and

⁷ Section 85(3), which requires consideration of this question if the Expert Panel is considering declining the application.



- e. **Cypress:** Continuation of the existing Cypress Mine authorised under existing consents; however, Wildlife Act authorities are required to be renewed, as well as variations to existing conditions to ensure overall integration with the BPCP.
11. Section 1.1 provides a detailed description of the temporal assumptions adopted in the SIA. The 16-year production period referenced in the SIA is based on the production schedule for the BPCP provided by Bathurst for preparation of the EIA. Notwithstanding the direction of Bathurst to maintain 2026 as the nominal commencement year, this 16-year period falls within the approximate 20-year timeframe for mining and construction operations identified in the AEE, bearing in mind the potential for variation in production rates over the duration of the Project. An additional period of decommissioning, remediation and rehabilitation will take place after the end of mining, prior to site relinquishment, resulting in the 20+ year Project duration nominated in the AEE. This subsequent activity would be subject of consents separate to this FTAA application.

The counterfactual (alternative or ‘base case’)

12. The counterfactual scenario or ‘base case’ against which the Project must be assessed is that current coal mining licences, ancillary coal mining licences and consents progressively expire, and no new consents for Buller Plateaux operations are granted. If the Project is not approved, the operations at Stockton and Cypress Mine will cease at the expiry of the existing Stockton Coal Mining Licence (CML) and Ancillary Coal Mining Licence (ACML) on 31 March 2027. In this case, after decommissioning, remediation and rehabilitation works, which would be subject of the grant of further consents, and a monitoring and maintenance period, all site operations would effectively cease. The range of social and economic benefits and costs relating the mine would also cease to accrue to the local and regional communities in particular, but also to New Zealand generally.
13. Although eventual cessation of mining on the plateaux is inevitable, the FTAA application facilitates continuing mining operations for approximately 20 years, followed by the period of decommissioning, rehabilitation and closure activity. This will sustain Bathurst as a regionally large business and allow the social contributions of it and its workforce to be maintained until this time. This may also support the various levels of government in preparing the West Coast Region and Buller District for the eventual transition away from the significant socioeconomic presence and contributions of coal mining.

Methodology adopted

14. The content of the SIA has been prepared with reference to the New South Wales (NSW) Government *Social Impact Assessment Guideline for State Significant Projects, February 2023*. The principles and methods on which the NSW guideline is based are also consistent with those propagated by the International Association for Impact Assessment (IAIA) and the Environment Institute of Australia and New Zealand Inc. (EIANZ). Bathurst has received independent advice that the use of the NSW guideline is appropriate for this Project.



15. The SIA is based on a combination of social science research methods, including primary and secondary source research and modelling of different project outcome scenarios. Secondary source material includes, for example, demographic data and other supporting material in relation to defining the areas of influence for the Project, explaining the application of social impact assessment practices and presenting supporting evidence from relevant sources.

Primary research elements

16. Bathurst has conducted a research project to assess the local social and economic effects of the existing Stockton mine in the Buller District Council (BDC) and West Coast Regional Council (WCRC) areas. The research identified that given the proximity of the existing Stockton Mine and operations proposed under BPCP to Westport and its immediately surrounding settlements, impacts are particularly concentrated in the Westport area. This is an important consideration from the perspective of the distribution and relative effect of the social impacts of the Project.
17. The research included an internal workforce survey. The outputs of the survey provide insights into the interactions of the Bathurst workforce within Stockton Mine/BPCP Buller primary and West Coast secondary regional areas. The research also established that a significant proportion of these workforce interactions take place in the mine's Westport local area. These interactions entail social contributions to the local Westport, regional and district communities as a whole, and in relation to specific activities and organisations within these communities.
18. The research also included several programs of engagement with a range of Westport, BPCP Buller primary and West Coast secondary regional area stakeholders, and specific interested stakeholder groups. The engagement methods used included structured and unstructured interviews, workshops, and community 'drop in' information sessions.
19. Project-specific engagement was also undertaken with various stakeholder groups, representing a broad range of interests in the Project.

Summary of key findings

20. The social benefits of the Project would largely accrue to the identified regional areas (i.e. WCRC, BDC, and, locally, Westport and its surrounding settlements). National level benefits would also result, such as the provision of additional public services that would be supported through payment of taxes and royalties from the Project, for example. However, in the broad national context, these national level social benefits are assessed as not being significant.

Assessment of regional community attitudes towards mining and Bathurst

21. The primary research outputs established that Bathurst's operations are generally seen as being socially and economically positive in the Westport local, and primary and secondary regional areas and have good levels of community support, noting that this support is not universal across these communities. As a result, it was concluded that on balance, Bathurst has established a generally accepted Social Licence to Operate (SLO) within the Westport local, and BPCP primary and secondary regional area communities.



22. The bases of this SLO are the contributions to the community through employees and their involvements in their communities, Bathurst commercial engagements with businesses in Westport, and the BPCP Buller primary and West Coast secondary regional areas, and the level of community support activity (financial and in-kind contributions) that Bathurst provides. In the absence of mining operations, there is a general recognition that there is no immediate, apparent industry of similar scale that could support the social and economic function of Westport and the Buller primary and West Coast secondary regional areas to the same extent as mining on the plateaux.
23. Notwithstanding that Bathurst is assessed as having established its SLO in Westport, and the BPCP Buller primary and West Coast secondary regional areas, some opposition to coal mining has also been identified in these areas. The SIA also identifies that opposition to mining exists beyond these primary and secondary regional areas, across other parts of New Zealand. This includes opposition from specific organisations representing parts of the population that actively object to coal mining. Both regional and more dispersed opposition to coal mining are generally based on opposition to the mining of fossil fuels for use as energy sources, and the physical effects of mining on the environment.
24. With respect to opposition within the Westport local, BPCP Buller primary and West Coast secondary regional areas, the investigations supporting the SIA indicate that this is a minority view. However, there are plateaux users in the Westport and Buller primary regional areas in particular, who may be affected by impacts on environmental and aesthetic values, and how they are able to access and use the plateaux, for example. These are assessed as tangible impacts.
25. With respect to people from other areas who oppose mining, these impacts are intangible, but can be characterised as ‘non-use’ values, such as the ‘existence value’ of knowing that an environmental asset exists, without necessarily directly visiting or experiencing that asset (i.e. the plateaux).
26. Regarding opposition focused on the mining of fossil fuels, approximately 96% of coal produced through current and proposed mining under the Project involves extraction of metallurgical (coking) coal as an industrial mineral, to be exported for use in steel production, noting that processing of the coal does involve the generation of some emissions. The remaining 4% of coal produced will be export thermal (steaming) coal used for energy production. Opposition to coal mining is most commonly focused on its contribution to energy generation and the resulting emissions. This does not apply to the substantial majority of BPCP product.

Extent of regional social impacts

27. The Stockton Mine workforce survey demonstrates that the significant majority of the workforce lives within WCRC secondary regional area. This is assumed to remain the case for the Project and will continue to have a significant impact on the social structure and functionality of Westport and its surrounding settlements, the BDC primary regional area, and to a lesser extent, WCRC secondary regional area. Based on the survey outputs, the assumed total BPCP workforce in each of the three areas is:
 - a. West Coast Region – 375 workers.



- b. Buller District – 372 workers.
 - c. Westport area – 326 workers.
28. A total of 775 people reside in workforce members' households, the majority of whom live in BDC (96%) and Westport and its immediate surrounds (84%). These people are direct beneficiaries of the employment provided by Bathurst, and the social and economic stability that is supported by workers' incomes. As recognised by the OECD, the benefits of family and/or household financial stability extend to the capacity for social inclusion and achievement of personal aims, which are seen as positive outcomes for the individual and the social environment in which they live. The numbers of residents in work force households will naturally vary over time. There may also be a temporary increase in the number of other members of workers' households during the construction stage, although the propensity for this cannot be assessed with any certainty, as it is dependent on the decisions and structure of individual households.
29. Workers and their fellow household and/or family members are engaged in education and employment, and a variety of social and community activities and organisations. These involvements contribute to the social functionality and cohesion of the regional communities. This is particularly the case in the Westport area, in which the majority of the workforce resides.
30. The economic effects of the BPCP also have broader positive social implications, which can also be inferred through the example of workforce incomes. For example, the 2023 Bathurst West Coast workforce survey identified an average of 57% of 'take home pay' as self-reported expenditure in company employees' local economies. The BPCP EIA assesses annual workforce expenditure in the BPCP primary regional area at around \$11.7 million, including Bathurst and contractor workers' incomes. This is estimated at around \$9.8 million for the Westport local area. The Ministry of Business, Innovation and Employment (MBIE) *Aotearoa New Zealand's Employment Strategy* (MBIE 2025) summarises the generally acknowledged positive outcomes of employment in the following terms: *'Work is an important part of our lives generating lifetime and intergenerational benefits. It contributes to the physical, mental, cultural and financial wellbeing of workers and their families. Work provides people with opportunities to use, develop and pass on their skills and knowledge. It creates a sense of purpose, helps build social connections and networks and has a positive impact on people's physical and mental health'*⁸.
31. Stakeholder feedback has emphasised that there are some outcomes of Bathurst's current presence in Westport, and the BPCP Buller primary and West Coast secondary regional areas that have the potential to cause substantial primary and secondary regional-scale problems, were mining not to continue. Bathurst's role in emergency management, such as its contributions to Civil Defence operations in the most recent major flooding event in July 2021 is an apparent example of this, with relevant stakeholders clearly being of the belief that response capability would be likely to be inadequate in the absence of Bathurst's contributions of human, capital and time resources.

⁸ <https://www.mbie.govt.nz/business-and-employment/employment-and-skills/employment-strategy/aotearoa-new-zealands-employment-strategy>



[REDACTED]

33. An important potential source of impacts on Westport and the Buller primary regional area community in particular relates to the anticipated influx of workers during the construction stage. This is specifically relevant to the Westport local area community. This may be mitigated to some extent if some part of the workforce is already resident in Westport or other parts of the Buller primary regional area. These effects would be temporary, but in terms of current housing market constraints, the increase is likely to increase demand for rental properties in particular, which may also place upward pressure on rents. Bathurst has investigated the current circumstances and options for managing workforce accommodation (August 2025). The findings indicate that there is likely to be sufficient capacity to manage any temporary demand for accommodation during the construction stages. It is recommended that Bathurst should continue to monitor capacity as construction activity nears commencement, should the BPCP be granted consent to proceed.

[REDACTED]

35. The SIA identifies opposition to mining generally as an adverse impact of the Project. This was identified at both regional and more dispersed geographic levels and was interpreted as extending to opposition to the existing Bathurst operations and the Project. Opposition to the use of coal for energy generation is a key element of this opposition. Despite the fact that 96% of the Project product would be metallurgical ('coking') coal, it is likely that this opposition will remain.
36. With respect to the physical effects of mining, remediation and rehabilitation activities will occur during and after the Project. It is noted that these activities include remediation of legacy impacts of historic mining on the plateaux, such as for acid mine drainage (AMD). Bathurst undertakes this work on behalf of the government. If the Project did not proceed, the government would need to make alternative arrangements to remediate these effects. It is likely that this would exceed the cost of current work because it would require a procurement process and establishment of an alternative contractor for the work. In



addition to procurement costs, there may also be some loss of accumulated knowledge in respect of the work required on the sites.

37. The Project presents an opportunity to extend the life of an established and to some substantial extent, socially accepted, industrial activity in the Westport area Buller District and West Coast Region. This may serve to facilitate a better planned and more orderly transition over the greater timeframe proposed for the Project, prior to the eventual mine closure, when compared with the base case scenario of 31 March 2027 closure.

Conclusions

38. Both positive and adverse impacts of the Project are considered in the SIA. On this basis, it is concluded that, on balance, the overall impacts of BPCP are assessed as being positive for the continued social and economic functionality and wellbeing of the local, district and regional communities.
39. There are also beneficial social outcomes for New Zealand, although these can be characterised as indirect, such as government provision of services that would be supported by additional taxes, royalties, and other payments. It is noted that these are of substantially less significance when compared with the district and regional level outcomes.
40. Overall, it is concluded that the Buller Plateaux Continuation Project will result in significant social benefit at each of the three regional levels. This benefit will be particularly concentrated in the Westport local and BPCP Buller primary regional area, with substantial benefits also for the BPCP West Coast Regional Council secondary regional area.



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Abbreviations

ACML	Ancillary Coal Mining Licence
AEE	Assessment of Environmental Effects
AMD	Acid Mine Drainage
ANZSIC	Australian and New Zealand Standard Industrial Classification
BDC	Buller District Council
Bathurst	Bathurst Resources Limited, its joint venture partners & subsidiaries
BPCP	Buller Plateaux Continuation Project ('the Project')
BRL	Bathurst Resources Limited
CML	Coal Mining Licence
DIDO	Drive In – Drive Out
DOC	Department of Conservation
DWC	Development West Coast
EIA	Economic Impact Assessment
EIANZ	Environment Institute of Australia and New Zealand Inc.
FIFO	Fly In – Fly Out
FTAA	Fast-track Approvals Act 2024 (legislation)
FY	Financial Year (1 July to 30 June)
GDP	Gross Domestic Product
IAIA	International Association for Impact Assessment
LoM	Life of Mine
MBIE	Ministry of Business, Innovation and Employment
N/A	Not available
NSW	New South Wales
NVIA	Noise and Vibration Impact Assessment
NZ	New Zealand
NZAIA	New Zealand Association for Impact Assessment
PV	Present Value
RMA	Resource Management Act 1991 (legislation)
SIA	Social Impact Assessment
SLO	Social Licence to Operate
StatsNZ	Statistics New Zealand
WCRC	West Coast Regional Council



1 Purpose of report

This report presents a Social Impact Assessment (SIA) addressing the regional and national effects of the Buller Plateaux Continuation Project (BPCP or “the Project”), proposed by Bathurst Resources Limited (including its subsidiary companies Bathurst Coal Ltd and Buller Coal Ltd, and joint venture company BT Mining Limited). These entities are collectively referred to as ‘Bathurst’ in this report.

The SIA has been prepared as part of a Fast Track Approvals Act 2024 (FTAA) application and forms part of the Assessment of Environmental Effects (AEE) for the Project. The SIA addresses the purpose of the Act, with respect to establishing the regional or national significance of the Project. From the perspective of social impacts, the SIA focuses on regional impacts. This focus is discussed further in Section 2.

Schedule 5, Clause 7(a) of the Fast-track Approvals Act 2024 requires an assessment of an activity in relation to:

- Any effect on the people in the neighbourhood, and, if relevant, the wider community, including any social, economic or cultural effects⁹.
- Any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations¹⁰.
- Any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations¹¹.

The SIA also has reference to Section 5(2) of the *Resource Management Act 1991* which provides for, *inter alia*, the ‘use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety. . . ‘.

In meeting these requirements, the purpose of the SIA is to assist with answering the following questions:

- Whether or not the Project will generate significant regional or national social benefits¹² and if so, what is the nature¹³ of those benefits?
- What will be the social impacts of the Project on people in the neighbourhood, and if relevant, the wider community?¹⁴

⁹ FTAA Schedule 5, 7(a).

¹⁰ FTAA Schedule 5, 7(d).

¹¹ FTAA Schedule 5, 7(g).

¹² The facilitation and delivering of projects with regional or national benefits is the purpose of the FTAA and is core consideration of the necessary assessment by the Expert Panel.

¹³ Section 81(4), FTAA.

¹⁴ Schedule 5, clause 7(a), which states the requirements of an assessment of an application to be determined by an Expert Panel.

- Whether the adverse impacts are sufficiently significant to be out of proportion to the Project's regional or national benefits?¹⁵

The SIA is one of the various expert reports that are contributing towards the consolidated Assessment of Environmental Effects (AEE) for the Project. Those other reports assess adverse effects that themselves entail social impact elements, and likewise those reports propose mitigation and other positive measures that could be assessed resulting in positive social benefit. It is important to ensure that the adverse and positive social impacts are not double counted by being included in this SIA and in those other reports. Aigis Group has received advice that this approach is consistent with Expert Panel interpretations issued to date under the FTAA.

The SIA describes the existing demographic context, and the social and socioeconomic contributions of Bathurst's current operations at Stockton Mine and its supporting sites. This analysis is then used as the basis for describing the projected ongoing effects and contributions of extended operations associated with the BPCP. The information is then used to discuss the social significance of the Project in the regional and national contexts, as is required under the FTAA.

A brief description of the Project is presented in this section. Given the complexity of the Project, it is recommended that the full BPCP Project Description should be referred to for further detail.

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

Broadly, the Project will enable approximately 20 million tonnes of export coal to be mined (with 96% of the coal being used in steelmaking, and the remaining 4% sold as thermal coal). At a high level, the following activities are proposed:

- Construction of the Upper Waimangaroa Haul Road (UWHR) and establishment and development of infrastructure;
- Mining operations;
- Rehabilitation and active closure; and
- Passive closure and monitoring.

The activities summarised above are anticipated to occur across a period of approximately 20+ years. It is proposed that activities at each sub-area will occur in a staged manner, generally following the sequence set out above, but not across all sub-areas concurrently¹⁶. The relevant sub-areas are:

- **Stockton:** Comprising the existing Stockton Mine, two proposed pest exclusion fenced areas and includes the Ngakawau Rail Loadout and associated Aerial Ropeway;

¹⁵ Section 85(3), which requires consideration of this question if the Expert Panel is considering declining the application.

¹⁶ Source: BPCP Project Description Section 5, April 2026.



- **Escarpment Extended:** Opencast mining with a combination of existing opencast pit (Escarpment), mining old underground workings (Whareatea) and an extension into unworked areas (Whareatea West);
- **Mount Frederick South:** A new opencast mining area with initial mining through old underground workings;
- **Upper Waimangaroa Haul Road:** The road connecting the Stockton Mine with the Mount Frederick South and Escarpment Extended operations; and
- **Cypress:** Continuation of the existing Cypress Mine authorised under existing consents; however, Wildlife Act authorities are required to be renewed, as well as variations to existing conditions to ensure overall integration with the BPCP.

It is important to note that the activities described above represent a ‘greatest extent’ scenario, including the maximum disturbance footprint for the BPCP. Bathurst has and will continue to refine the footprint of the key mine components during detailed design and exploration to reduce environmental impacts to the extent practicable and improve the efficiency and effectiveness of the mining operations. Furthermore, a small number of activities associated with the BPCP, namely water and dust monitoring, and pest exclusion fenced areas, will occur outside the sub-areas across the Plateaux¹⁷.

1.1 Temporal assumptions, parameters and effects

Along with the SIA, Aigis Group also prepared the Economic Impact Assessment (EIA) for the BPCP. A significant characteristic of these two reports is that they are closely linked and in various respects, interdependent. There are social impact considerations that also have economic impact aspects and vice-versa, thus the frequently used characterisation of certain impacts as being ‘socioeconomic’ in nature. Because of the interdependencies between the SIA and the EIA, the following assumptions used to allow quantification of economic impacts for the Project are also assumed for assessing related social impacts. For example, the social and economic implications of the influx of an additional temporary workforce during BPCP construction in Westport are clearly temporally linked.

The temporal and related assumptions that are foundational to the comparative assessment method described above are:

- As is standard economic assessment practice, analysis commences with a ‘zero year’, although this does not generally infer a ‘zero’ economic value for that year, particularly in the context that the BPCP will involve continuation of current operations at Stockton Mine.
- The economic analyses for the EIA were largely prepared during 2025, using data current at that time as a basis, including various key assumptions for economic variables.
- There is inherent uncertainty regarding the duration of statutory processes for the Project application and, if approved, Project initiation. Bathurst has directed that the EIA be based on the assumption of 2026 as the ‘zero year’ for the Project, although the Project is likely to commence later than 2026.

¹⁷ Source: BPCP Project Description Section 5, April 2026



- The 16-year production period reported reflects the production schedule for the BPCP provided by Bathurst for preparation of the EIA. Notwithstanding the direction of Bathurst to maintain 2026 as the nominal commencement year, this 16-year period falls within the 20+ year timeframe for mining and construction operations, bearing in mind the potential for variation in production rates over the duration of the Project. It is also noted that in the production schedule provided, construction is assumed as occurring concurrent with ongoing production at Stockton Mine. Because of the links between the EIA and the SIA, this nominal period is the basis of reporting in the SIA.
- In the BPCP planning material provided by Bathurst (from which the production schedule was sourced), the two periods of construction activity were identified as being between 2026 to 2027 and 2030 to 2031). As is the case with BPCP initiation, it is likely that these periods will differ from those assumed in the SIA and EIA. However, in order to allow a temporal link between the construction period and its social and economic effects (such as potential temporary impacts on local housing occupation and broader availability), the temporal planning assumptions provided by Bathurst have been used.

1.2 The counterfactual scenario - alternative (base) case

The alternative or base case against which the Project must be assessed is that the current Coal Mining Licence (CML) and Ancillary Coal Mining Licence (ACML) will expire on 31 March 2027, and no new consents for Buller Plateaux operations are granted. In this case, after a period of decommissioning, remediation and rehabilitation works, all site operations would effectively cease. As is the case with corresponding works for the BPCP, those works would be subject of separate consents to the existing CML and ACML. The range of social and economic benefits that arise from Stockton Mine would also cease to accrue to the local and regional communities in particular, but also to New Zealand generally.

Although eventual cessation of mining on the plateaux is inevitable, the FTAA application facilitates continuing mining operations for approximately 20 years¹⁸, with a subsequent period of decommissioning, rehabilitation and closure activity thereafter. This will sustain Bathurst as a regionally large business and allow the social contributions of it and its workforce to be maintained until this later time. This will also provide additional time to enable the various levels of government to prepare the West Coast Region and Buller District for the eventual transition away from mining as a major regional socioeconomic contributor.

¹⁸ In both the BPCP and base cases, decommissioning and remediation/rehabilitation works, and a subsequent period of monitoring and/or maintenance of the work would follow. As noted in Section 1.1, the



2 Methodology

The content of the SIA has been prepared with reference to the New South Wales (NSW) Government *Social Impact Assessment Guideline for State Significant Projects, February 2023*. The principles and methods on which the NSW guideline is based are also consistent with those propagated by the International Association for Impact Assessment (IAIA) and the Environment Institute of Australia and New Zealand Inc. (EIANZ). Bathurst has received independent advice that the use of the NSW guideline is appropriate for this Project¹⁹. As a NSW-based firm, Aigis Group is familiar with the application of this guideline to mining projects and considers that the guideline is appropriate for use for this Project. Annexure 4 includes a statement of authorship which identifies the firm's experience in social impact and related assessments for mining projects and other projects of comparable scale and significance.

For the purposes of clarity, it is important to note that term 'impact', as used in impact assessment practice, refers to all forms of impacts. The NSW guideline states that: **'Social impacts may be both positive and negative, direct and indirect, or tangible and intangible'** (2023:8). Accordingly, the SIA uses the term impact inclusively when discussing impacts generally and identifies the nature of specific impacts when these are addressed.

IAIA states that; *'Projects can create opportunities and benefits for people, but at the same time they can also create harmful effects. Typically, projects are never uniformly good or bad, there is a differential distribution of costs and benefits within nearby communities'* (2015:1). The SIA adopts this statement as characterising the potential of the Project for creating social impacts across the identified social areas of interest.

This approach also entails consideration of the 'precautionary principle', which is defined as; *'Where there are threats or potential threats of serious social impact, lack of full certainty about those threats should not be used as a reason for approving the planned intervention or not requiring the implementation of mitigation measures and stringent monitoring'*²⁰. The precautionary principle must also be applied in the context of the 'uncertainty principle', which in summary is; *'it must be recognised that our knowledge of the social world and of social processes can never be fully complete because the social environment and the processes affecting it are changing constantly, and vary from place to place, and over time'*²¹.

In applying these concepts to assessing the Project, a fundamental characteristic of the BPCP is that it represents the continuation of a longstanding and currently operational industrial activity in the Buller District and West Coast Region. As such, the potential positive and negative impacts of the Project are well understood within these communities. This accumulated knowledge has provided a

¹⁹ Bathurst commissioned a peer review of the SIA. As part of that process, the peer reviewer stated that the use of this guideline was appropriate. The peer review is to be lodged as part of the AEE. Aigis Group's response to certain matters raised in the peer review is included in this SIA, at Annexure 7.

²⁰ Vanclay, F. 2003. International Principles for Social Impact Assessment, *Impact Assessment and Project Appraisal* volume 21, number 1, March 2003, pages 5-11. Beech Tree Publishing, Surrey, UK.

²¹ *ibid*.



key input into the planning of the Project, to the effect that the impacts of the Project are likely to be consistent with those created by previous and current activity on the plateaux.

In order to assess the Project from these perspectives, the objectives of the SIA are to:

- Define the social areas of influence of the Project (Section 2.3), and its baseline social characteristics (Section 3).
- Report on engagement conducted with key stakeholders and stakeholder groups. The outcomes of this engagement are reported in Section 5, except where otherwise specifically noted). The engagements include:
 - Bathurst workforce;
 - West Coast Regional Council, and its three constituent territorial authority areas, with particular emphasis on Buller District Council²².
 - Other infrastructure and service providers.
 - Iwi representatives.
 - Development West Coast.
 - Community organisations (e.g. heritage groups).
 - Potentially affected landholders.
 - Business community representatives.
 - Specific interested stakeholders and groups, such as regular users of the plateaux (e.g. recreational users).
 - Environmental groups (e.g. Environment Defence Society).
- Identify social risks and impacts of the Project and the people who may perceive and/or experience those risks and impacts, based on engagement outcomes, social baseline information, and other relevant published information and data. The identification of risks and impacts and their effects is based on the impact categories identified in the NSW SIA guideline. The categories are shown in Table A. The corresponding categories from the New Zealand Association for Impact Assessment (NZAIA) are included for reference. This establishes that the approach taken is based on a generally accepted analytical structure²³.
- Assess the relative distributions of risks and impacts.
- Assess the effectiveness of proposed avoidance, management and mitigation proposals in respect of Project risks and impacts.
- Where appropriate, propose additional approaches that may contribute to risk and impact management.
- Summarise the balance of positive and adverse impacts in a benefit statement for the Project.

The SIA is based on the use of several social science research methods. These include:

- Interviews and surveys.
- Workshops and focus groups.

²² The other two councils are Grey District Council and Westland District Council.

²³ For example, IAIA (2015:2), based on: Vanclay, F. 2003 International Principles for Social Impact Assessment. Impact Assessment & Project Appraisal 21(1), 5-11. <http://dx.doi.org/10.3152/147154603781766491>



- Modelling of different scenarios.
- Comparative studies.
- Trend extrapolation.

Annexure 3 identifies and describes the application of these methods within the SIA.

The identified benefits of the Project:

- a. Are assessed against a counterfactual of mining ceasing on the Buller Plateaux by 31 March 2027, as described in Section 1.1.
- b. Address countervailing effects and benefits that arise from the Project that are not identified and assessed as adverse impacts in other specialist technical assessments forming parts of the AEE.

The purpose of the above clarification is to ensure that, in assessing the potential materiality of the Project's social costs and benefits, those costs and benefits are not "double counted", having been addressed in other specialist technical reports. The SIA reports social impacts relating to the effects identified in the technical reports. The social impacts identified and addressed in this SIA are *not additive* to the impacts identified in technical reports but represent stakeholder and community views on the potential effects of those impacts on them.



Table A: Social impact categories

Table A: Social impact categories			
NSW DPHI Guideline Category	Description	NZAIA Category	Description
Way of life	Includes how people live, how they get around, how they work, how they play and how they interact each day.	Way of life	Lifestyles, work, interactions, and recreation
Community	Includes composition, cohesion, character, how the community functions, resilience, and people's sense of place.	Culture	Belief systems, customs, values, language, or dialect
Accessibility	Includes how people access and use infrastructure, services and facilities, whether provided by a public, private, or not-for profit organisation	Community	Cohesion, stability, character, services, and facilities
Culture	Both indigenous and non-indigenous, including shared beliefs, customs, practices, obligations, values and stories, and connections to land, waterways, places and buildings.	Political and governance systems	The extent to which people are able to participate in decisions that affect them, the level of democratization, and resources provided for this purpose
Health and wellbeing	Includes physical and mental health especially for people vulnerable to social exclusion or substantial change, psychological stress resulting from financial or other pressures, access to open space and effects on public health	Environment	Air and water quality, availability and quality of food, levels of hazard or risk, dust and noise exposure, adequacy of sanitization, physical safety, and access to and control over resources.
Surroundings	Includes ecosystem services such as shade, pollution control, erosion control, public safety and security, access to and use of the natural and built environment, and aesthetic value and amenity	Health and wellbeing	Physical, mental, social, and spiritual wellbeing
Livelihoods	Includes people's capacity to sustain themselves through employment or business	Personal and property rights	Particularly where people are economically affected, or experience personal disadvantage e.g., a violation of their civil liberties, human rights, and customary rights
Decision-making systems	Includes the extent to which people can have a say in decisions that affect their lives, and have access to complaint, remedy, and grievance mechanisms.	Fears and aspirations	Perceptions about safety, fears about the future of their community, and aspirations for their future and the future of their children.

Content source: NZAIA 2025; and NSW DPHI 2023, with relevant amendments for the Project context.



2.1 Application to Project SIA

Substantively, the SIA presents the following material:

- A regional baseline social profile for the West Coast Regional and Buller Local Authority Council areas as the main study areas of interest for the Project. As is appropriate in the context of the FTAA legislation, the regional and district level data are compared with those for New Zealand, as the broad study area of comparison. A national comparison is also appropriate given that the mining industry attracts the interest of various parties in other parts of New Zealand beyond the direct district and region.
- A profile of the existing Stockton workforce and their contributions to the regional and local communities and economies. The profile draws on primary research comprising a workforce survey conducted in December 2023 and a contemporaneous series of interviews with local and regional stakeholders in respect of these contributions. These are described further in Section 2.2.
- Relevant socioeconomic measures drawn from the Economic Impact Assessment (EIA) for the Project, which Aigis Group has also prepared.
- A projection of the impacts that may result from the continuation of operations proposed in the Project. This includes an assessment of the social risk profiles for the various impacts. The risk assessment is based on the material presented in the SIA and takes into consideration outcomes under both the Project approval and the current ‘base case’ situation, based on existing consents. The ameliorating effects of proposed impact management and mitigation initiatives is also assessed.

The aim of this approach is to present the positive and adverse social impacts of both the BPCP and the base case, to allow a balanced assessment of the two alternatives. A second outcome is that the relative interests of the regional and district communities and impacts on these are assessed in comparison with other stakeholder groups that are not necessarily resident in the area, as noted above. This is an important comparison, because it also addresses the relative immediacy of impacts on these local/regional and the more remote interested groups. This distinction is discussed in SIA Sections 2.4, 6.4.1 and 6.4.2.

2.2 Description of primary research inputs

The primary research is based on the survey of the Bathurst workforce conducted in December 2023. The survey gathered socioeconomic data, which was used to develop a profile of the workforce’s contributions to, and engagement in, the local community and economy. This included both qualitative and quantitative measures. The survey and its structure are discussed in greater detail in Section 4.

A series of stakeholder interviews was conducted in November and December 2023. These focused mainly on key regional and district community organisations but also included some local business operators in the Westport area. It is noted that these interviews were organised by Bathurst. The aims were to obtain an understanding of the community’s qualitative views on the level of social



involvement and economic contribution of Bathurst's employees, and those arising from the company's direct impacts in conducting business in the region. Bathurst has also initiated a program of engagement with a wide range of stakeholder groups, specifically in relation to the BPCP. At the time of finalisation of this report, this program was continuing. The information obtained was used to assess the extent to which Bathurst has established a regional 'Social Licence to Operate'.

The SIA also draws on the EIA, which was also prepared by Aigis Group. There is a close relationship between the social and economic (i.e. socioeconomic) effects of this and any similar project, as economic activity is one key measure of the wellbeing and behaviour of a community and its members. As one of the largest individual business entities in the West Coast Region and the Buller District, Bathurst's activities are of relatively substantial scale in this regional context. Consequently, its activities have socioeconomic impacts that correspond to this relatively large regional scale.

2.3 Determination of Project study areas

This section compares demographic data for the West Coast Regional and the Buller District Council areas and New Zealand as a whole²⁴. The district, regional, and national populations form different elements of the Project's 'study area', with each locality having its own set of stakeholders and beneficiaries. The purpose of the FTAA is to facilitate the delivery of infrastructure and development projects of regional or national benefit. The demographic data describe the social baseline context for the Project within these study areas, noting that the distribution of impacts varies across the three.

Because the Project is located in the Buller District and the majority of its impacts are concentrated in the Buller District area, limited emphasis is placed on effects within the other two territorial authorities within the WCRC area (Grey District Council [GDC] and Westland District Council [WDC]). It is noted however, that the stakeholder interviews conducted as part of the primary research task included interviews with elected representatives and senior management personnel from WCRC, GDC and WDC. These engagements provided evidence that the West Coast Region as a whole has interests in, and benefits from, Bathurst's operations.

Data are generally extracted from the most recent (2023) Statistics New Zealand (StatsNZ) Census, unless otherwise identified. Social and economic profiles produced by Infometrics for the West Coast Region, Buller District and the included comparisons with New Zealand have also been used as source material. Generally, where other alternative data is used, it is the most recently available data produced by StatsNZ, Infometrics or other relevant public agencies, the sources of which are presented in the relevant in-text and footnote references, and in the references at the end of the report. As noted above, the social baseline situation is principally presented through the demographic profile, for relevant elements of the study areas.

²⁴ New Zealand is referred to as 'NZ' in tables and figures.



The Project includes two construction periods (nominally 2026 to 2027, and 2030 to 2031)²⁵. The construction stages of the Project will require accommodation and related services for workers from other areas, which may have some temporary effects. Bathurst has conducted an audit of accommodation availability, focused on the Westport area, being the nearest settlement to the Buller Plateaux and the area most likely to experience any impacts. The findings of the audit are reported in Section 6.4.3.

2.4 Impact distribution across study areas

As noted in Section 2.3, BPCP impacts will be differentially distributed across the three study areas, but with particular emphasis on the Buller District and the West Coast Region. In terms of nomenclature, there is a potential conflict between the meaning of ‘regional’ under the FTAA, and its application to the Project, given that one of the main geographical areas identified as a study area is a regional council area (to wit, West Coast Regional Council). That conflict is realised to an extent in relation to describing the study areas in the SIA. The following sections discuss this and the relationships between the ‘regional’ study areas, with a view to resolving this conflict.

2.4.1 Buller District

The existing Stockton Mine and the other BPCP sites are located within the Buller District. The mine is located approximately 15 kilometres from Westport. With respect to any physical impacts of mining, it is evident that proximity to the mine will be positively related to the magnitude of these impacts.

Westport is the largest settlement in the Buller District and is its administrative and commercial centre. Statistics New Zealand (StatsNZ) data indicate that around 57% of the Buller District population lives in the Westport Statistical Area Level 3 (SA3). Around 43% of the SA3 population lives in Westport itself.

Data from the workforce survey (SIA Section 4) shows that 84% of the Bathurst workforce survey sample lived in Westport or its immediate surrounds. This is essentially predictable, because of the spatial dispersal of other settlements in Buller District, and the need for Bathurst to practice workforce fatigue management. In addition, the nearest settlement of scale is the larger Greymouth, which is approximately 100 kilometres from Westport by road. Therefore, Westport is the logical, preferred residential location, based on convenient access to the services offered in a township of Westport’s size. Bathurst also purchases various goods and services from businesses based in the Buller District, and particularly Westport.

In the absence of the BPCP (i.e. the base case of mine closure in March 2027), there is a prospect that a material proportion of the Bathurst workforce will necessarily leave the area to find

²⁵ It is noted that the commencement of the Project may be later than that on which the Project has been modelled for the purposes of the FTA application. Bathurst has directed that the EIA be based on the assumption of 2026 as the ‘zero year’ for the Project, although the Project is likely to commence later than 2026. Assessed effects of the BPCP would remain the same regardless of commencement allowing for consent processes and Project initiation, assuming that the proposed Project economic assumptions remained the same. Therefore, it is unlikely that later commencement would materially change the net beneficial outcomes.



alternative employment (refer to SIA Section 6.3 for a discussion of various impacts). With no apparent substitute industry of scale, the reduction in population at the end of mining on the plateaux may result in lower demand, and potential diminution of service levels provided in Westport for the remaining population. As noted, because Westport is the administrative and commercial centre for the Buller District as a whole, this is likely to be relevant to the entire Buller District population.

For the purposes of this report, the Buller District is assessed as being the ‘BPCP Buller primary regional area’.

2.4.2 West Coast Region

As BDC is a constituent district council within WCRC, it follows that the effects of BPCP on the Buller District are also effects applying to the West Coast Region. Consistent with the approach taken in Section 2.4.1, most effects of current mining and that planned under the BPCP are less apparent than for the Buller District. Nevertheless, a proportion of Bathurst workforce members live in parts of the West Coast Region outside of the Buller District. Bathurst also conducts business with firms in other parts of the West Coast Region, such as Greymouth.

For the purposes of this report, the West Coast Region is assessed as being the ‘BPCP West Coast secondary regional area’.

2.4.3 References to regional and district council areas

Where the SIA discusses BDC and WCRC as geographic governmental divisions, these are referred to as the ‘council areas’. For example, this applies to discussion of demographic information, as it is recorded and presented on that basis. Accordingly, depending on context, a reference to BDC council area is a reference to the Buller District, and a reference to WRC council area is a reference to the West Coast Region.



3 Existing social environment

3.1 Personal characteristics

Table 1 presents summary demographic data for the populations of BDC, WCRC and New Zealand. The data describe personal characteristics of the population. All data for BDC and WCRC relate to these respective council areas.

Table 1: Demographic profile; Person characteristics, WCRC & BDC council areas

Table 1: Demographic profile; Person characteristics, WCRC & BDC council areas			
	BDC (%²⁶)	WCRC (%)	NZ (%)
Population (2023 Census)	10,446	33,390	4,993,923
Male	51.3	50.8	49.4
Female	48.7	49.2	50.6
Median Age	52.0 years	48.1 years	38.1 years
0-14 years	14.7	16.3	18.7
15-29 years	11.5	13.5	19.4
30-44 years	15.1	16.8	20.7
45-59 years	21.5	21.6	18.6
60-74 years	27.2	23.1	15.3
75+ years	10.0	8.8	7.3
15-64 years	58.9	61.1	64.7
Ethnic Groups²⁷			
European	90.6 ²⁸	89.7	67.8
Māori	13.0 ²⁹	13.5	17.8
Asian	3.3	4.0	17.3
Pacific peoples	1.7	1.6	8.9
Middle Eastern/ Latin American/ African	0.6	0.5	1.9
Other ethnicity	2.2	2.2	1.1
Birthplace³⁰			
New Zealand	87.9	86.8	71.7
Languages spoken³¹			
English	98.1	97.8	95.4
te reo Māori	1.8	1.8	3.7

²⁶ Highlighted data excepted.

²⁷ 'Includes all people who stated each ethnic group, whether as their only ethnic group or as one of several. Where a person reported more than one ethnic group, they have been counted in each applicable group' (Statistics NZ).

²⁸ Calculated as a proportion of total population, for comparison between BDC and WCRC. Totals do not tally to 100%. This applies to all subsequent categories.

²⁹ Data reported as recorded. In respect of small differences in totals, Statistics NZ states that: 'this data [sic] has been randomly rounded to protect confidentiality. Individual figures may not add up to totals and values for some data may vary in different text, tables and graphs'.

³⁰ Some Statistics NZ subgroups are further aggregated for birthplace, language and relationship status. Based on total people stating birthplace, not total population.

³¹ Includes respondents who nominated more than one language; therefore, totals differ from population counts. Percentages recorded against population



	BDC (%)	WCRC (%)	NZ (%)
Legally registered relationship status³²			
Never married	32.3	33.3	34.9
Married (not separated)	46.3	46.9	48.1
Separated	0.4	3.8	3.5
Divorced or dissolved	10.4	9.6	7.9
Widowed	6.7	6.4	5.6

Data source: Stats NZ Census 2023 (2025)/ Infometrics 2025

3.1.1 Observations on demographic data – person characteristics

Key points from the data in Table 1:

- There are relatively more male than female residents in both the BDC and WCRC areas, which is atypical when compared to most larger populations, e.g. the total population for New Zealand. There is evidence to indicate that this may be influenced by regional industry structure, which features a predominance of jobs that are often occupied by males.
- The regional and district council area populations are notably older than the national population. Higher median ages for Buller and West Coast council areas demonstrate this, with the medians being increased by lower proportions of people under 15 years (14.7% [BDC] and 16.3% [WCRC] compared with 18.7% for NZ,) and higher proportions of people aged 60 years and over (37.2% [BDC] and 31.9% [WCRC] compared with 22.6% for New Zealand). The higher median ages are apparent in Figure 1 below, which compares WCRC and BDC council areas, and New Zealand. Figure 1 also clearly demonstrates the progressive ageing of the population, which has been more rapid in the WCRC and BDC areas, compared with New Zealand.
- BDC and WCRC council areas are relatively culturally homogenous when compared with New Zealand as a whole, with around 90% of the population born in New Zealand and approximately 91% being of European descent. There are higher proportions of people of European descent, lower proportions of people of Māori descent, and generally lower levels for other ethnicities, as compared with the New Zealand demographics. The lower level of diversity may be considered as typical of a relatively small and comparatively remote areas such as the BDC and WCRC council areas, with less in- and out-migration.
- Cultural homogeneity is also indicated by language most commonly spoken. This is strongly concentrated on English (approximately 98% for both the BDC and WCRC council areas), with other languages, including te reo Māori, being notably less common than among the national population.
- Registered relationship status is considered an indicator of population stability in an area. With the exception of widowed people, those experiencing a change in marital status display greater mobility than those whose marital status does not change³³. Married persons are less represented, and divorced persons more represented for BDC and WCRC council areas, compared with the figures for the whole of New Zealand. However, these differences are not at levels suggesting any major inconsistencies with the national benchmarks. Given the

³² Persons aged 15 years and over. Based on total people describing status, not total population.

³³ E.g. Speare & Goldschieder (1987:455-464)



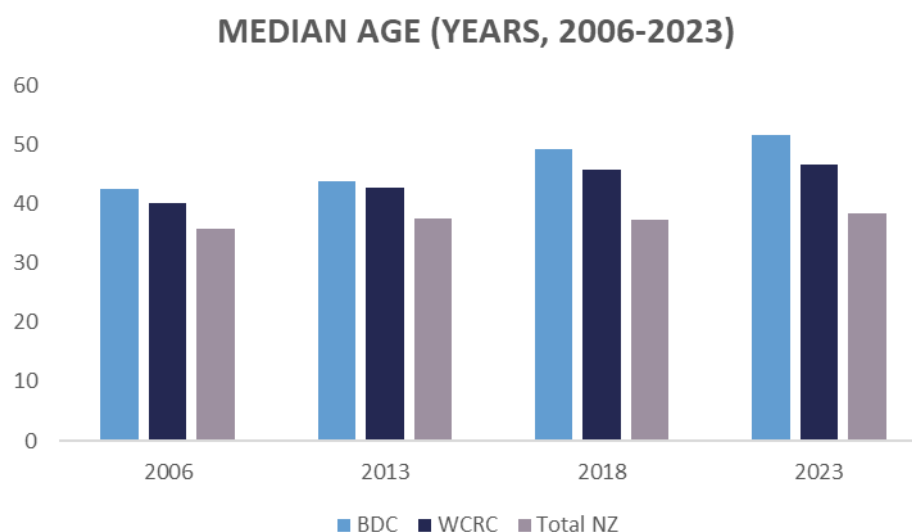
industrial base of the area, the larger proportion of males may be related to this larger number of divorced persons, with males in this group possibly more likely to remain in the area in continuing employment. This may be specifically relevant to occupation in the mining industry, given the geographic element to available employment in the industry.

3.1.2 Additional data on age structure

Figure 1 presents the median age data for each of the WCRC constituent district council areas and compares these to the median age for New Zealand as a whole. The data are from the 2006, 2013 and 2018 Censuses. The 2023 data are from estimated regional population data as of 30 June 2023.³⁴ Points of note are:

- BDC council area has the highest median age at each comparison point and shows a consistent increasing trend. This infers that the BDC population has progressively aged over time.
- The 2023 median age for BDC council area is 6.8 years older than for WCRC council area and 16.7 years higher than for New Zealand.
- In the 10 years between 2013 and 2023, the BDC median age increased by 10.7 years. WCRC increased by 5.1 years while New Zealand remained essentially stable.

Figure 1



The older populations in the two council areas are a consequence of the combination of both more, older-aged, and fewer younger-aged residents (refer to Table 1). Figures 2 and 3, show change by age group for the BDC and WCRC council areas respectively, over time. Table 2 shows the supporting cumulative changes for each age group of BDC and WCRC (2006-2023). The age groups up to 59 years declined for both regional populations. The declines were greater for BDC council area than for the WCRC council area. Both populations had significant proportional increases in the groups

³⁴ StatsNZ Subnational population component changes and median age (RC, TA), as of 30 June 2018-2023.
< <https://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE7510> >



covering people 60 years and over, demonstrating the ageing of the BDC and WCRC council area populations.

Figure 2

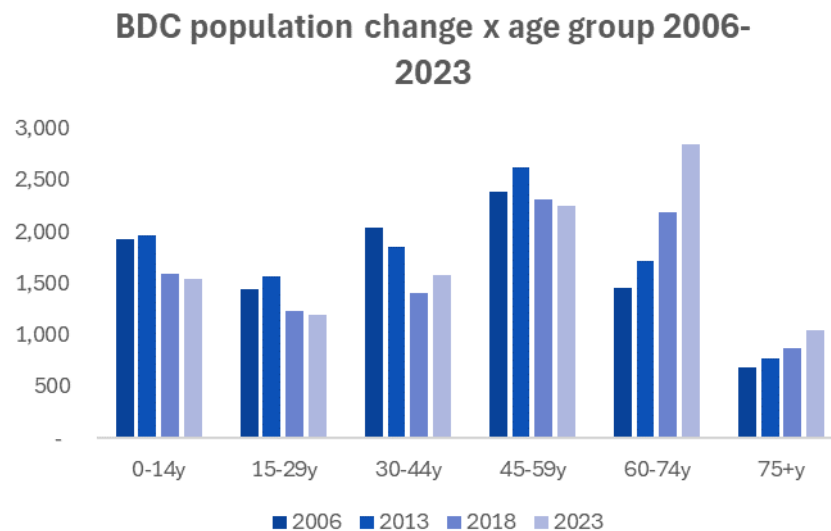


Figure 3

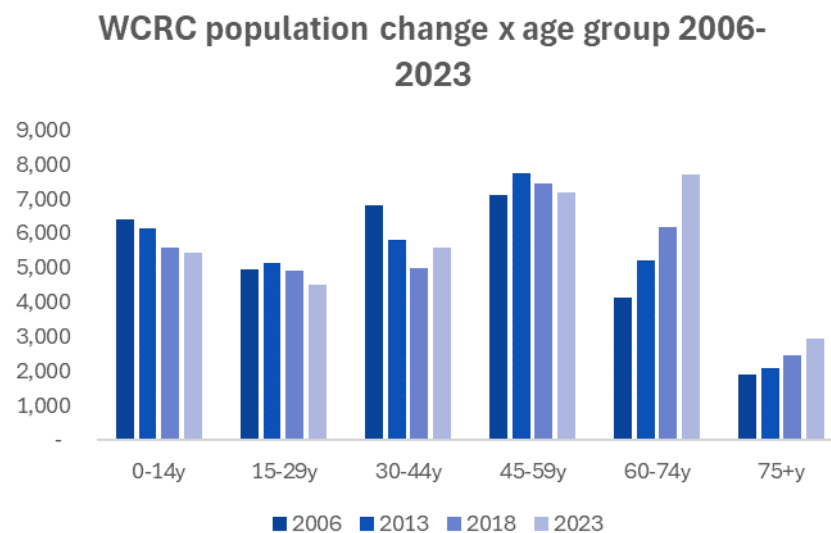


Table 2: Cumulative population change by age group, BDC & WCRC³⁵ 2006-23

Table 2: Cumulative population change by age group, BDC & WCRC 2006-23 (%)						
	0-14y	15-29y	30-44y	45-59y	60-74y	75+y
BDC	-20.3	-16.9	-22.8	-5.9	96.1	51.3
WCRC	-14.9	-8.9	-18.0	1.3	85.9	54.1

³⁵ Council areas



3.1.3 Socioeconomic implications of regional population ageing

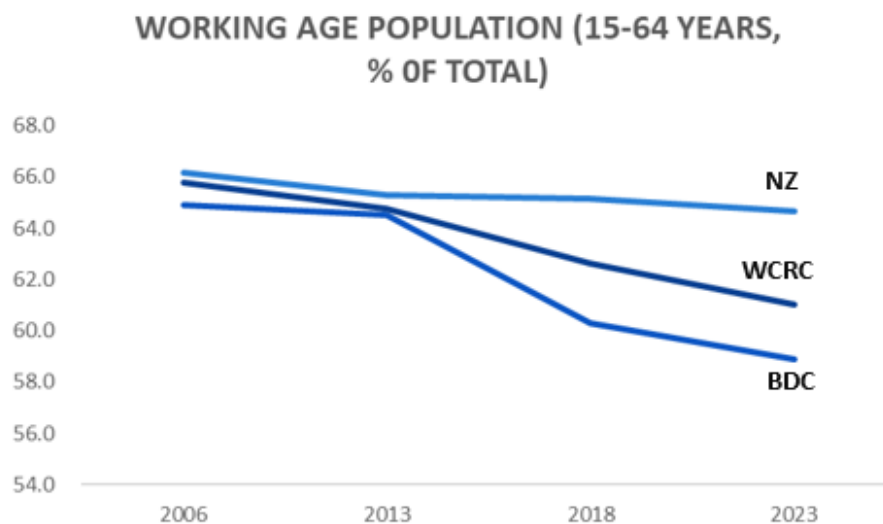
A further effect of the progressive ageing of the population that is relevant to the socioeconomic circumstances of BDC and WCRC primary and secondary regional areas respectively, in regard to the BPCP, is the decline in the size of the working-age population (people aged 15-64 years). In part, this is likely to be attributable to 'natural attrition', occurring as people retire from the workforce. As is the case with the total population decrease, the decline in the working age population is more apparent in BDC council area than in the WCRC council area. The declining regional measures contrast with those for New Zealand, which has declined at a distinctively lower rate (BDC -9.3%; WCRC -5.7%; New Zealand -1.5% between the 2006 and 2023 Censuses). This 'background' decline provides context regarding the importance of sustaining employment opportunities such as Bathurst's ongoing operations, which would contribute to the economic and social stability and sustainability of the BDC and WCRC economies, as the BPCP primary and secondary regional areas, respectively. It is probable that any significant reduction in Bathurst's operations and employment would further deplete the BDC BPCP primary regional area's working age population, in particular. This is based on the prospect that some proportion of the workforce would need to relocate to find comparable alternative employment. This may be exacerbated by the other employed people in workers' households also leaving the area; and a decline in business for Bathurst's regionally located suppliers and contractors, which may also reduce employment levels and the benefits associated with employment.

Table 3: Decline in working age population 2006-2023

Table 3: Decline in working age population 2006-2023			
	BDC	WCRC	NZ
	15-64 years (%)	15-64 years (%)	15-64 years (%)
2006	64.9	65.8	66.2
2013	64.7	64.8	65.3
2018	60.8	62.6	65.1
2023	55.6	60.1	64.7

Data source: StatsNZ 2025

Figure 4



Population projections set out in Section 3.4 indicate that predicted population decreases for the BDC and WCRC council areas over time will also likely result in further simultaneous population ageing and decline in the size of the working age population, which may have adverse socioeconomic consequences³⁶. The Project presents an opportunity to extend the life of an established, and to some substantial extent socially accepted, industrial activity in the district and region. This may serve to facilitate a better planned and more orderly transition over the greater timeframe proposed for the Project, prior to the eventual mine closure, when compared with the base case scenario of March 2027 closure. As noted, the effects of population ageing are discussed further in Section 3.4.

3.2 Qualification, employment and income data

3.2.1 Qualification levels

Level of qualification, or educational attainment, particularly occupationally related education and training, is a determinant of employment prospects and thus long term financial and social stability, and quality of life for individuals and households. With respect to employment, this facilitates several beneficial outcomes. The OECD *Better Life Index, New Zealand*, observes that; *‘Having a job brings many important benefits, including; providing a source of income, improving social inclusion, fulfilling one’s own aspirations, building self-esteem and developing skills and competencies’*³⁷.

³⁶ Poot (2007) investigated the impacts of immigration (refer to Section 3.1.1 of the SIA) and population ageing on regional competitiveness, observing that; ‘Remoteness continues to have a negative impact on economic performance . . .’ [2007:4]; ‘Broadly, high levels of immigration coincide with higher economic growth . . .’ (2007:5); and; ‘Furthermore, since labour mobility (geographic, occupational, industrial or job to job) is inversely related to age, population ageing may also lower productivity through slowing down structural adjustment in the economy’ (2007:9)



Table 4 presents the highest level of qualification attained for the BDC and WCRC council areas and the nation from the 2023 census. The data show that Level 4 certification is more common for BDC and WCRC, compared with New Zealand. This level of education equates to trade-level qualifications, considered as consistent with the regional industry base. There is also a notably higher proportion of persons without qualifications living in the BDC council area (at 30.1% of the population) compared with the WCRC council area (27.1% of the population) and New Zealand as a whole (at 17% of the population).

There are lower proportions of those with a bachelor's degree within the BDC and WCRC council areas (at 5.8% and 6.8% of these populations respectively), compared with New Zealand (at 13.7% of the population). Subsequent discussion of the BDC and WCRC council areas' industry employment structure offers evidence that the lower proportion of people holding these qualifications may be associated with the greater availability of employment opportunities within the BDC and WCRC council areas that do not necessarily require degrees. For occupations that do require degrees, it is assumed that the prevalence of these is a function of demand consequent to the sizes of the BDC and WCRC council areas' populations.

Table 4: Demographic profile; highest qualification (2023 Census)

Table 4: Demographic profile; highest qualification (2023 Census)			
	BDC (%)	WCRC (%)	NZ (%)
No qualification	30.1	27.1	17.0
Level 1 certificate	15.1	14.3	10.5
Level 2 certificate	10.0	10.9	9.3
Level 3 certificate	8.8	8.8	10.6
Level 4 certificate	9.6	9.9	8.3
Level 5 diploma	4.0	4.9	4.6
Level 6 diploma	3.6	4.2	4.6
Bachelor's degree & other level 7	5.8	6.8	13.7
Post-graduate & honours degrees	2.3	2.9	5.3
Master's degree	1.0	1.3	3.4
Doctorate degree	0.2	0.3	0.8
Overseas secondary school qual.	2.4	2.3	5.5

Data source: StatsNZ 2025

3.2.2 Labour force status

The most recent labour force data are presented in Table 5. The regional and national data shown are for the 31 March quarter 2025. StatsNZ aggregates the regional data to 'Tasman, Nelson, Marlborough, West Coast', which impacts their application to analysis focused on the West Coast solely. To the extent that the data are applicable, there are variations to the national measures. The employment rate and participation rate are lower than for New Zealand generally. Conversely, the favourable measures of unemployment and underutilisation³⁸ are lower in the aggregated region

³⁸ StatsNZ summarises underutilisation as: 'Labour underutilisation reflects the total number of people in the labour force who are not being fully utilised, as well as some who are outside of the labour force who can be



and therefore better than the national situation. The ‘not in the labour force’ measure is higher for the region than nationally. Noting the limitations due to regional aggregation, the WCRC and BDC council areas’ population age profiles discussed previously suggests a likelihood that the older regional population, and the accompanying probability that there is a larger proportion of retired residents (no longer in the workforce) in the region may be contributing factors.

Table 5: Demographic profile; labour force status, March 2025

Table 5: Demographic profile; labour force status, March 2025		
	Regional³⁹(%)	NZ (%)
Employment rate	66.8	67.2
Underutilisation rate	11.3	12.3
Unemployment rate	3.8	5.1
Labour force participation rate	69.5	70.8
Not in the labour force	30.5	29.2

Data source: StatsNZ May 2025

3.2.3 Occupation

Table 6 presents the workforce occupational structure for the BDC and WCRC council areas, and New Zealand. The data shows that employment in traditional ‘blue collar’ industries (i.e. machinery operators and labourers combined) is higher in BDC council area (28.1%) and WCRC council area (22.7%) compared with New Zealand as a whole (15.8%). Employment in traditional ‘white-collar’ industries (i.e. professionals, clerical and administration workers combined) is lower in the BDC (21.9%) and WCRC (29.0%) council areas respectively, compared with New Zealand as a whole (35.7%). These results are interpreted as being a consequence of a lower population creating lower demand for professional services, as noted in Section 3.2.1.

With respect to the higher proportions of labourers in the BDC and WCRC council area workforces, these positions may require no formal qualification. This may in part explain proportional qualification levels (as noted in Section 3.2.1). A further factor may be related to the comparatively older population of the BDC council area. Recognition of qualifications changes over time, and qualifications attained many years ago by older residents may no longer be recorded, reported or compliant with current classifications.

There is a distinctively high proportion of managers in BDC council area in particular (21.6% based on 2023 Census data) and also for WCRC council area (19.8%). The proportion for New Zealand is 17.8%. This is likely to be a consequence of the predominance of small enterprises in the comparatively less diversified district and regional economies. This is apparent in the 2024 data (Infometrics, 2025), which record the combined proportion of the workforce who are self-employed as 19.4% for BDC council area, 17.8% for WCRC council area, and 15.5% nationally. The higher proportion of managers must also be considered in the context of regional industry structure and

considered ‘potential labour supply’. A detailed explanation of underutilisation is provided by StatsNZ: *Introducing underutilisation in the labour market* (2016). <https://www.stats.govt.nz/methods/introducing-underutilisation-in-the-labour-market>

³⁹ Tasman, Nelson, Marlborough, West Coast, as noted in text.



business sizes. 24.4% of BDC council area businesses are in the agriculture, forestry and fishing ANZSIC industry grouping, compared with 22.6% for the WCRC council area, and 10.0% for New Zealand⁴⁰. Considering these data, it is noted that primary producers such as farm businesses are commonly managed by their owners, which may in part explain the relatively high proportion of managers.

Table 6: Demographic profile; Occupation, WCRC & NZ (2024), BDC (2023)⁴¹

Table 6: Demographic profile; Occupation, WCRC & NZ (2024), BDC (2023)			
	BDC	WCRC	NZ
	%	%	%
Managers	21.6	19.8	17.8
Professionals	16.7	20.3	25.1
Technicians and trade workers	13.5	12.1	12.6
Community & personal service workers	9.8	9.0	9.4
Clerical and administration workers	9.5	8.7	10.7
Sales workers	6.9	7.3	8.7
Machinery operators and drivers	9.0	7.9	5.2
Labourers	13.2	14.9	10.6

Data source: StatsNZ/Infometrics 2025

In the context of mining, the significantly higher proportion of machinery operators and drivers is consistent with the regional industrial base, which includes mining, other extractive sectors, forestry, and agriculture. A similar observation can be assumed in respect of the larger proportions of labourers, particularly in respect of agricultural employment.

Table 7 presents mean annual earnings (from employment) and per capita income data for the WCRC and the BDC council areas and compares it to earnings and income across the whole of New Zealand. The WCRC and BDC council areas have lower levels of earnings and per capita income than nationally. The most likely explanation for the lower regional measures is the distribution of income across the contextually small regional and district populations. The comparatively older populations of the WCRC and BDC council areas may also be factors. This observation is supported by the higher WCRC and BDC council areas' median age data (Figure 2) and more rapidly declining working age populations (Table 3).

Table 7: Demographic profile: income data WCRC & BDC council areas 2024

Table 7: Demographic profile: income data WCRC & BDC areas 2024⁴²			
	BDC \$ p.a.	WCRC \$ p.a.	NZ \$ p.a.
Per capita income	48,563	50,687	51,990
Mean annual earnings	71,295	71,097	78,731

Data source: Infometrics 2025

⁴⁰ Infometrics 2025.

⁴¹ Council areas.

⁴² Infometrics 2025.



3.3 Household and family demographic data

The structure of households and families is another demographic feature for which the BDC and WCRC council areas differ from New Zealand generally. Table 8 includes comparisons for relevant measures of family and household structures for the BDC and WCRC council areas, and New Zealand. The data presented are drawn from the 2023 Census (StatsNZ, 2025).

Table 8: Demographic profile: families & household composition WCRC & BDC council areas; Census 2023

Table 8: Demographic profile: families & household composition WCRC & BDC council areas; Census 2023			
	BDC %	WCRC %	NZ %
Couple without children	55.7	53.1	41.5
Couple with child(ren)	30.2	33.0	42.0
One parent with child(ren)	14.1	13.9	16.5
One family household ⁴³	74.8	76.2	76.4
Two family household	2.9	3.4	7.6
Three or more family household	0.1	0.2	0.8
Other multi-person household	3.7	4.2	5.6
One-person household	17.6	15.1	8.4
Household composition unidentifiable	0.8	0.9	1.2
Mean people/household (count)	2.1	2.2	2.7

The BDC and the WCRC council areas had markedly larger proportions of one-person households at around 17.6% and 15.1% respectively, compared with the national figure of 8.4%. This is likely to have had the effect of reducing the average number of people per household. These outcomes are also consistent with the older population profile and the larger proportions of widowed and divorced people identified in Table 1. A further indicator of the older population is the higher proportion of couple households without children (for example, households in which children, including adult children, have left the household). This is approximately 14 and 12 percentage points higher for BDC and WCRC council areas respectively, compared with New Zealand.

3.4 Population projections

Figure 5 presents historic changes in population⁴⁴ for WCRC council area and its three constituent district councils, compared with New Zealand. The base data are presented in Table 9. New Zealand is represented by the line series and right axis of the chart. The national population has grown by a cumulative 16.7% over the period 2006 to 2023.

⁴³ One and two-family households are further described as 'with or without other people' (Statistics NZ Census 2023).

⁴⁴ The data are 'usually resident populations'.

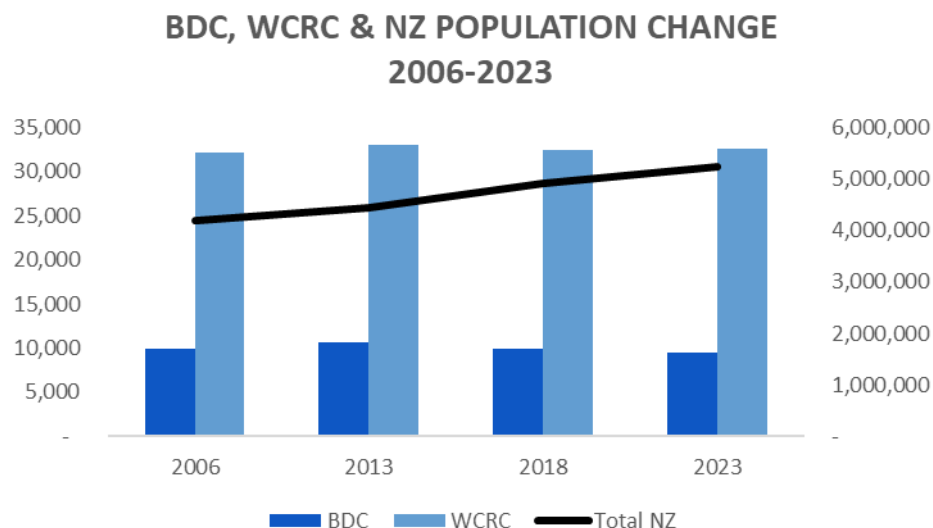


The district and regional populations have fluctuated somewhat but were relatively stable. For example, the BDC council area population increased by 7.9% between 2006 and 2013, and then declined by [-]8.4% between 2013 and 2018 noting that the decline coincides with the change of ownership of Stockton Mine (Solid Energy to Bathurst) in 2015 and the closure of the Holcim cement plant in 2016, both of which involved reductions in district/regional employment. Thereafter, the population recovered by 8.9%. The cumulative effect between 2006 and 2023 was an increase of 7.7%.

A similar but less pronounced pattern occurred for the WCRC council area, with an increase (2.6%) between 2006 and 2013, a subsequent decline of [-]1.8% from 2013 to 2018, and an increase of 5.7% between 2018 and 2023. Overall, cumulative change between 2006 and 2023 was an increase of 6.3%. The cumulative increase for New Zealand between 2006 and 2023 was 24%.

Data presented in the BPCP EIA indicates that the increases and decreases in population for the WCRC and particularly BDC council areas discussed above coincide with rises and falls in economic output for the West Coast mining industry in particular. This is suggestive of the influence of the mining industry over total economic performance in the region, and the associated social impacts that this entails.

Figure 5



Data source: StatsNZ 2025.



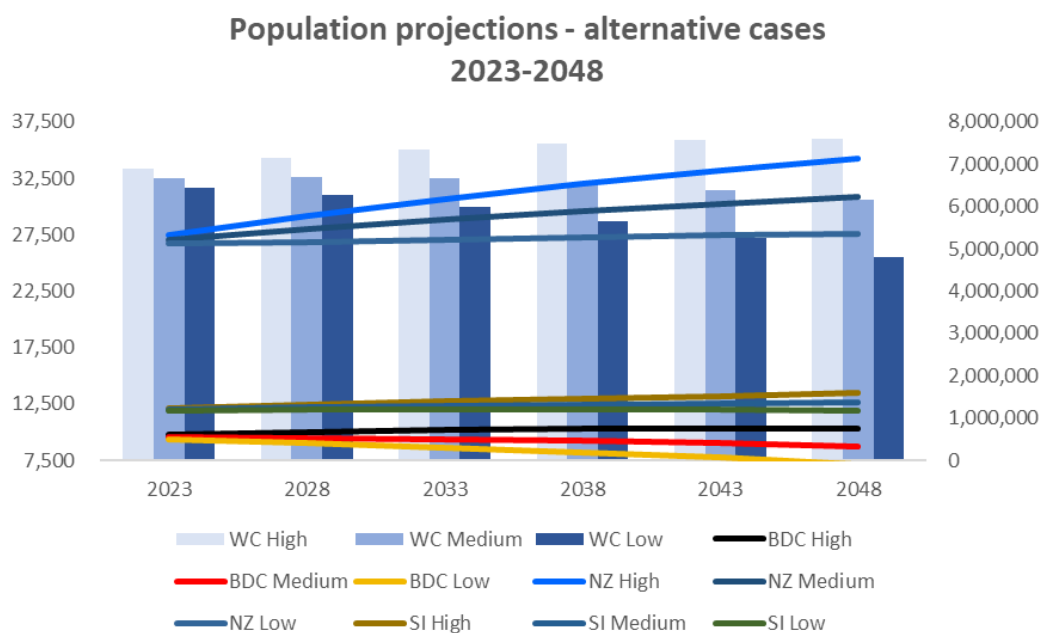
Table 9: Historical population change 2006-2023

Table 9: Historical population change 2006-2023				
Population	2006	2013	2018	2023
Buller	9,940	10,473	9,591	10,446
West Coast	31,326	32,148	31,575	33,390
Total NZ	4,027,947	4,242,048	4,699,755	4,993,923

Data source: StatsNZ 2025.

Figure 7 displays projected population figures for WCRC and BDC council areas to 2043, displaying each of StatsNZ's low, medium and high-growth assumptions⁴⁵. StatsNZ states that, 'Projection assumptions for fertility, mortality, and migration are formulated after analysing short-term and long-term historical trends, information provided by local planners, and current government policy'⁴⁶. The WCRC council area (column series) and BDC council area (lowest line series) trajectories indicate only marginal increases in the best-case scenarios (0.3% and 0.1% respectively), the magnitudes of which are presented in Table 10. These projections differ from those at a national level, which are represented by the upper line series, and which indicate sustained growth in all three scenarios.

Figure 7



Data Source: Stats NZ 2025. WCRC & BDC populations counted on left vertical axis; NZ population counted on right vertical axis.

⁴⁶ StatsNZ 2025. Subnational population projections 2018 (base) – 2048 update. 12 December 2022.
< <https://www.stats.govt.nz/information-releases/subnational-population-projections-2018base2048-update/#assumptions> >



Table 10: Population growth rate projections WCRC & BDC council areas 2018-2048 (average annual change [%])

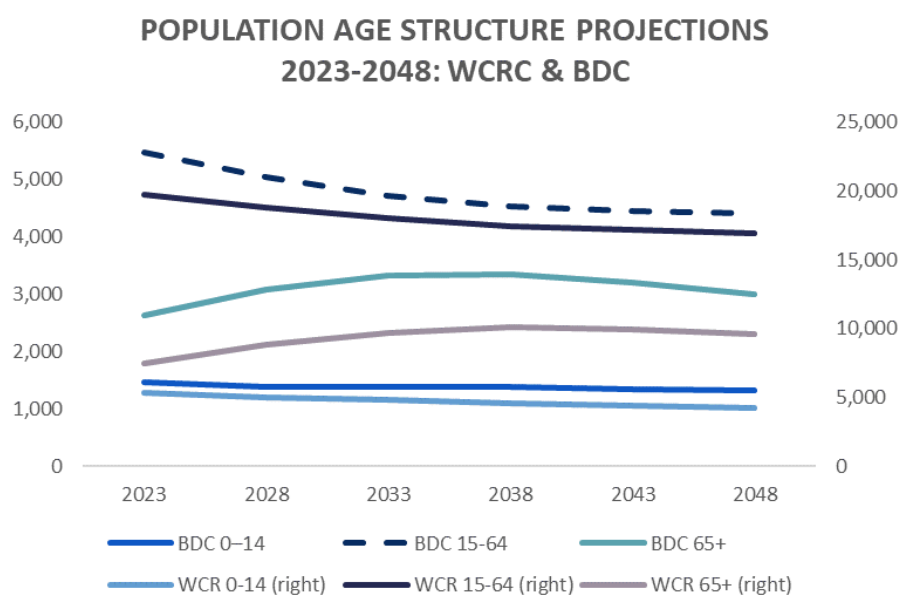
Table 10: Population growth rate projections WCRC & BDC council areas 2018-2048 (average annual change [%])			
	Low (%)	Medium (%)	High (%)
NZ	0.4	0.7	1.0
South Island	0.1	0.6	1.1
WCRC	-0.9	-0.3	0.3
BDC	-1.3	-0.6	0.0

Population projections indicate that the regional and district populations will not replicate the increases expected at a national level, or for the South Island. Growth assumptions are lower for BDC council area than for WCRC council area as a whole.

The potential projected decreases would ordinarily result in a decline in economic activity, as demand falls, consequent to smaller populations. The potential fall in economic activity is likely to be exacerbated by the simultaneous ageing of the populations, their associated, relatively limited financial resources, and declining working age populations. Projections for population and household age structures (Figures 8 and 9) demonstrate these predicted trajectories.

Figure 8 demonstrates that only the 65-years and older populations are projected to increase during the period 2023 to 2048 within the WCRC and the BDC council areas, noting that BDC council area is predicted to increase marginally to around 2033, plateau and then decline from 2038 onwards, signalling a potential decline in total population.

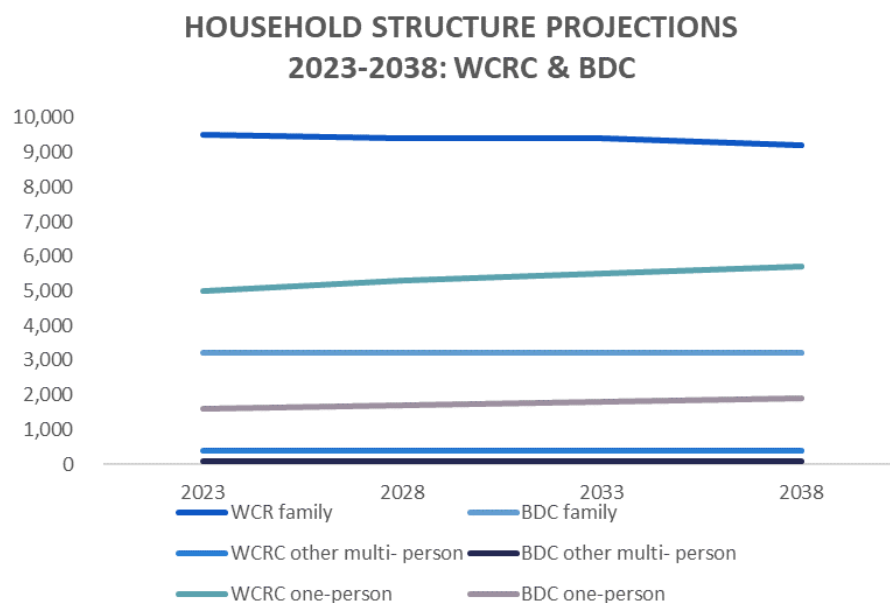
Figure 8



Data source: Stats NZ 2025

Figure 9 shows modest increases in one-person households only, for the region and the district. The BDC council area increase (around 19%) is proportionally higher than the WCRC council area projection (14%). As has been established, these households are also characteristic of older populations. This provides additional evidence of projected population ageing over this period, with the implied declines in services required to sustain socioeconomic district and regional economic status.

Figure 9



Data source: Stats NZ 2025

In the context of these structural demographic change projections, it is essential that public policy provides the conditions for maintaining industries that support additional economic activity in the West Coast region. Failure to do so is likely to result in the loss of services and facilities associated with declining demand, which would further discourage growth and regional sustainability, from both economic and social perspectives. There have been relatively recent, sharp declines in BDC population that coincided with significant industrial change⁴⁷, which provide evidence of such effects. The EIA for the Project, which this report references, demonstrates that mining is a significant economic contributor in Buller and West Coast as the BPCP primary and secondary regional areas, respectively, and is one of the key industries in maintaining the scale and socioeconomic contributions of the working-age population. The relationship between employment and social and economic advantage was discussed in Section 3.2.1.

⁴⁷ Refer to the working age population data reported in SIA Table 4 and Figure 3.



3.5 StatsNZ wellbeing statistics

High level StatsNZ wellbeing measures are presented in Table 11. As noted earlier, the regional data are aggregated to include Nelson, Tasman, Marlborough and West Coast regions, and must therefore be applied to the specific circumstances of the WCRC region with appropriate caution. The mean ratings for each of the three measures are lower for the aggregated region than for New Zealand as a whole. As the ratings are based on a zero to ten scale, the variances for each measure do not appear large enough to suggest any significant divergence between the region and New Zealand.

Table 11: 2023 Summary wellbeing statistics (StatsNZ 2024)

Table 11: 2023 Summary wellbeing statistics (StatsNZ 2023)⁴⁸		
	New Zealand	Nelson/Tasman/ Marlborough/ West Coast
	Mean ratings	
Overall life satisfaction	7.6	7.2
Overall life satisfaction, 5-year expectation	8.1	7.9
Family wellbeing	7.6	7.4

3.6 2023 New Zealand Socioeconomic Deprivation Index (NZDep2023)

StatsNZ describes the NZDep2023 as combining: *‘values for a range of geographic areas with various concepts, such as ethnic group, home ownership, occupation, and dwelling dampness, to provide insights into the people and households within each area’* (StatsNZ 2025). NZDep2023 scores are presented in deciles (graduations of 10%). StatsNZ (2025) notes that; *‘the higher the deprivation decile, the more socioeconomically deprived the area’*.

The Buller District comprises eight Statistical Areas Level 2 (SA2s). Five of these (Westport North, Westport South, Buller Coalfields, Inangahua and Reefton had index scores of 9. The other SA2 scores were Karamea (8), Westport Rural (4) and Charleston (6)⁴⁹.

The scores indicate that some areas in BPCP Buller primary regional area are nominally less socioeconomically advantaged than others. It is noted that this issue was raised in local stakeholder engagement⁵⁰. Because the Project proposes a continuation of established activity in the BPCP Buller primary regional area (and the broader BPCP West Coast Region secondary regional area), it is assessed as unlikely that there would be any material change on the circumstances of vulnerable

⁴⁸ Released 25 September 2024.

⁴⁹ The University of Otago (2025) provides the following caution in respect of interpreting the index data: *‘A view is sometimes expressed in reference to NZDep that ‘it is disgraceful that still 10% of areas are most socioeconomically deprived’. Please note that 10% of areas will always fall into the most socioeconomically-deprived decile of NZDep scores—NZDep is designed to measure relative socioeconomic deprivation, not absolute socioeconomic deprivation’*.

⁵⁰ One attendee at the community information sessions raised this issue. Engagement with social services provider Homebuilders, based in Westport (November 2023) also identified some areas of deprivation. However, it was also stated that the influence of mining on the Westport area was socioeconomically positive.



parts of the community, due to the Project, if approved. Regarding the base case scenario (cessation of mining in 2027), Annexure 5 presents a case study on the effects of previous major industrial ‘shocks’ in the BPCP Buller primary regional area and in the Westport area in particular. The study demonstrates the substantial socioeconomic changes that followed these shocks. The base case would represent a change in current circumstances, and as a consequence, impacts on vulnerable parts of the community may result in this instance.

3.7 Summary of comparative demographic profile

There are clear differences in demographic structure between the BDC and WCRC council areas, and the total New Zealand population, several of which are relevant to assessing the Project.

The district and regional populations are older when compared with New Zealand and are projected to continue to age and for the BDC council area, potentially decline in population size over the coming decades. This will result in a corresponding, gradual decrease in the working age population. It is probable that these processes would be accelerated by earlier closure of Bathurst’s operations on the Buller Plateaux. In addition to the direct effects of the absence of a business of Bathurst’s relative regional scale (including employment and other commercial activity), the derived economic activity supported by Bathurst’s operations would also be lost to the district and region. As defined by the OECD (refer to Section 3.2.1 of the SIA), there are various economic and social benefits that employment would sustain, for employee households and for the regional and local communities more generally. The economic aspects of the Project, including those that contribute to positive social outcomes are discussed in detail in the Project EIA.

As noted, the Project would entail similar socioeconomic effects to current operations. Therefore, the Project of itself is considered as being unlikely to alter vulnerability of the community generally, or of specific sections of the community. Conversely, the base case would result in a significant change. It is considered as likely that this would result in adverse impacts. The potential for such outcomes is discussed in further analyses presented in this SIA.



4 Primary data: Bathurst West Coast Workforce Survey

4.1 Introductory comments

An employee survey was conducted in late 2023 to develop a demographic and socioeconomic description of Bathurst's workforce employed in the Buller District. This survey was the second time that the workforce was surveyed for this purpose, the first being in 2018. The survey results contribute to further understanding of the social and economic circumstances in the West Coast Region and Buller District. The aim of the research was to illustrate the extent of workforce contribution to, and participation in, the BDC and WCRC economies and communities. The following information describes the structure of the survey, its implementation and the survey results.

4.2 Method

4.2.1 Description of approach

The aim of the survey was to contribute to a workforce profile complementing the regional and company profiles, which do not otherwise adequately illustrate the socioeconomic engagements of employees with the communities in which they live. The survey objective was to obtain and introduce additional data to the corporate knowledge base that usually is not recognised or gathered but is important because it provides a qualitative and quantitative description of the more localised socioeconomic effects of employment with Bathurst. This is augmented by Bathurst internal data that provide a complementary description of the company's commercial interactions in the areas in which its operations are located. This element of the study was considered to be critical to describing the extent of socioeconomic effects of the one mining operation in the Buller district and West Coast region. This applies to both the existing Stockton Mine (corresponding with the base case for the SIA), and the BPCP.

With respect to interpretation of the term 'region' in the following data and figures, this refers to the West Coast Regional Council area. The relevant question in the survey instrument asked for the respondents' residential 'town/locality'. Respondents' residential locations were then located within their residential district and regional council areas. In relation to analysing the effects of these locations, they can also be appropriately considered as the BDC BPCP primary regional area and WCRC BPCP secondary regional area. This distinction is made where appropriate in the following material.

The underlying hypotheses were that a large proportion of the workforce is resident in the BDC and WCRC council areas. Based on this foundational hypothesis, it was further assumed that these workers and their households undertake a proportion of their economic activities (e.g. consumption through purchase of necessities) in the district and regional economies. Given the relative isolation of BDC and WCRC council areas, the assumption was that this proportion was likely to be reasonably substantial.

Similarly, given their connection to their location of residence, these households also engage in a range of social activities that they generally value in terms of their quality of life, and which also in many instances provide often unacknowledged value to the community in which they live. In certain



instances, the curtailment of these engagements due to the departure of households from a community impose notional, practical and in some cases financial costs on that community, in the form replacing the lost community contribution. For example, the loss of a trained Civil Defence volunteer may necessitate the recruitment and training of a replacement volunteer, or, in the circumstances that the original volunteer was not replaced, a loss of capability/capacity. Against the baseline situation where the Project is not approved and the existing Coal Mining Licences and approvals expire in March 2027, the earlier cessation of mining would accelerate the substantial structural and functional changes to the Buller primary and West Coast secondary BPCP regional areas' socioeconomic circumstances.

In order to test the research hypotheses, a questionnaire was developed which sought to establish the extent of the workforce's social and economic interactions and connectedness with regional communities. The method is a descriptive research approach. It was assumed that not all workforce members would be available at the time of the survey, therefore the outputs are a sample of the workforce more generally, albeit a proportionally large sample by usual research standards.

4.2.2 Limitations of method

As the research method was fundamentally qualitative, the research was not designed to enable detailed testing of the results for statistical validity or probability. However, as acknowledged, for the purposes of the analyses, descriptive methods were generally adopted. Based on the design of the survey questions, response variables were generally categorical in nature, consistent with the demographic nature of the research. The survey was assumed as being a sample of the workforce, given that at any given time, some part of the workforce is likely to be away from work. Further on sampling and sample size is included in Section 4.4.

4.3 Administration of survey

The Bathurst workforce survey was undertaken in December 2023. The survey was administered to Bathurst's West Coast workforce at the following sites:

- Stockton Mine.
- Ngakawau Fixed Plant Site.
- Bathurst Westport Office.

Responses were also received from personnel nominally employed at the following sites:

- Escarpment Mine.
- Cascade Coal.

The survey instrument was provided to participants as a hard-copy questionnaire, which was collected on completion and returned to the Westport office for data processing. This method was considered as being most suitable for eliciting a high response rate, as it was conducted on site at the operational sites during pre-shift meetings, at which the majority of the workforce was present. The collective presence of the workforce at the pre-shift meetings also allowed an explanation of the rationale for the survey and clarification of specific questions.



4.4 Statistical information – survey outcome

At the time of the survey, Bathurst had a nominal workforce of 317 people. Survey instruments were distributed to and returned by 232 employees. This is 73% of the total direct Bathurst employees for West Coast operations. In addition, Bathurst also had an average of 72 full-time equivalent (FTE) contractor employees engaged on its West Coast sites. 51 valid responses from contractor employees were also received, comprising approximately 71% of the average contractor workforce. This resulted in an overall total of 283 valid responses for the entire workforce⁵¹, with a response rate of 72% of the current workforce⁵². This response rate compares favourably with generally accepted standards. A response rate of this order provides significant validation to the findings for the primary research.

4.4.1 Socioeconomic benefits of employment

An underlying premise of the research was that workers' engagements with their local communities generally have positive impacts. *Aotearoa New Zealand's Employment Strategy* (MBIE 2025) summarises the generally acknowledged positive outcomes of employment in the following terms: *'Work is an important part of our lives generating lifetime and intergenerational benefits. It contributes to the physical, mental, cultural and financial wellbeing of workers and their families. Work provides people with opportunities to use, develop and pass on their skills and knowledge. It creates a sense of purpose, helps build social connections and networks and has a positive impact on people's physical and mental health'*⁵³.

4.5 Relevant survey findings

4.5.1 Workforce composition

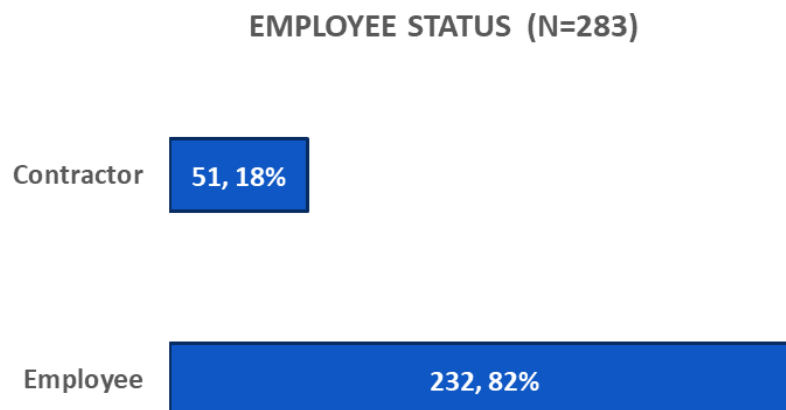
As noted in the description of the survey statistics (Section 4.4), the workforce was comprised of direct employees of Bathurst and contractors to Bathurst working at Bathurst sites. The composition of the workforce is presented in Figure 10. Approximately 82% of the surveyed workforce were direct Bathurst employees. The remaining 18% were contractors. It is noted that a substantial proportion of the contractor roles at Stockton are basically full time equivalent (i.e. Stockton is the only site these workers work at).

⁵¹ In this report, the workforce refers to the total of direct Bathurst and contractor employees.

⁵² Valid responses may not however, include answers to all questions. Consequently, there is variation in the reported total number of responses for some questions and variables.

⁵³ <https://www.mbie.govt.nz/business-and-employment/employment-and-skills/employment-strategy/aotearoa-new-zealands-employment-strategy>

Figure 10



4.5.2 Workforce residential tenure in region & time employed in industry

Figure 11 shows the duration of workers' residential tenure in the West Coast council area, noting that this is mostly concentrated in Westport and its surrounds, within the Buller District council area. Summarising Figure 11, around 66% of the workforce has lived within the West Coast council area for more than 10 years. As subsequent data on home ownership will demonstrate, this indicates that the workforce is socially and economically invested in the Buller and/or West Coast council areas.

Figure 11

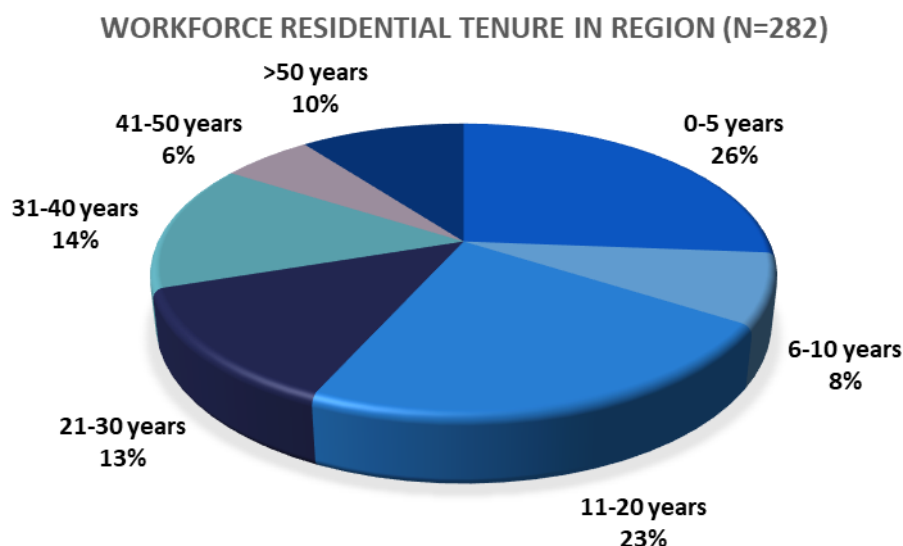


Figure 12 shows industry employment tenure. 54% of the workforce has worked in the mining industry for more than ten years. Given the relative scarcity of opencast mining activity elsewhere in New Zealand, there is some likelihood that the employment opportunities provided by Stockton Mine may influence workers to remain in the BPCP primary (Buller) or secondary (West Coast) regional areas. It is noted, however, that 35% of respondents had worked in the industry for five

years or less. Other survey data found that 73% of respondents had been in their present job for five years or less, which is interpreted as indicating a relatively high level of employee turnover.

Figure 12

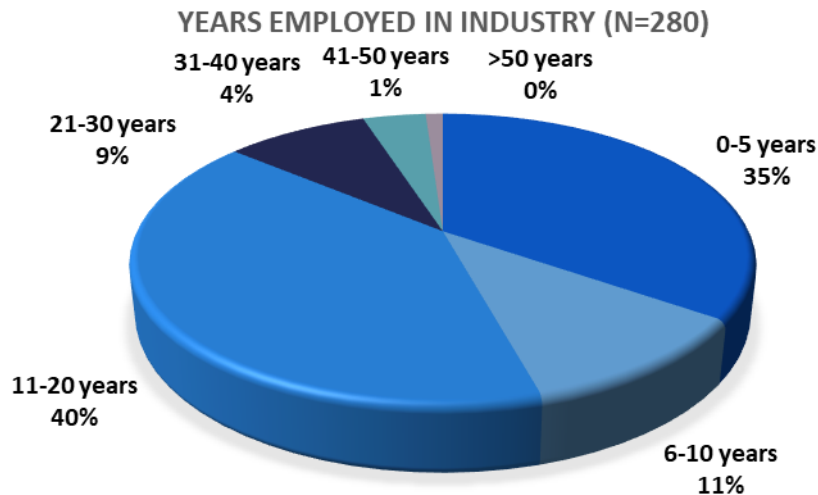
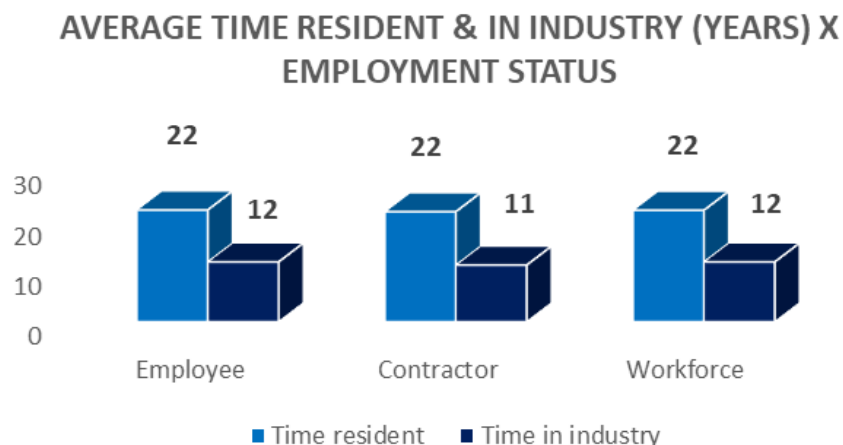


Figure 12(a) compares the averages of the data from Figures 11 and 12. The data are similar for each group, with contractor time in the industry (less one year) being the only divergence. This is substantially a consequence of skewing caused by the much larger number of Bathurst employees than of contractor workers.

Figure 12(a)



Associations between variables were tested using Pearson product-moment correlation coefficient (r) tests. These produced:

- A moderate positive correlation between time resident in the area and industry tenure ($r = +0.37$). This indicates that responding longer term mining industry workers are more likely to have lived in the Buller primary or West Coast secondary regional areas for longer.



- A weak correlation between time living in respondents' residential location and time in the current job ($r = +0.23$). This indicates that although time resident and time in the current job increase together, the relationship is less clear than for the time resident/industry tenure test. This is interpreted as being consistent with the relatively high proportion of workers with five or less years' service in their current jobs (73%).
- For reference, there was moderate positive correlation between industry tenure and time in current job ($r = +0.45$). This was the strongest correlation and indicates that time in the industry and time in the current job both increase together. This is considered as an expected outcome.

Overall, the data suggest a cohort of 'veteran' resident employees, and a cohort of employees who are new to their employment and to residence in the BPCP Buller primary, or West Coast secondary regional areas.

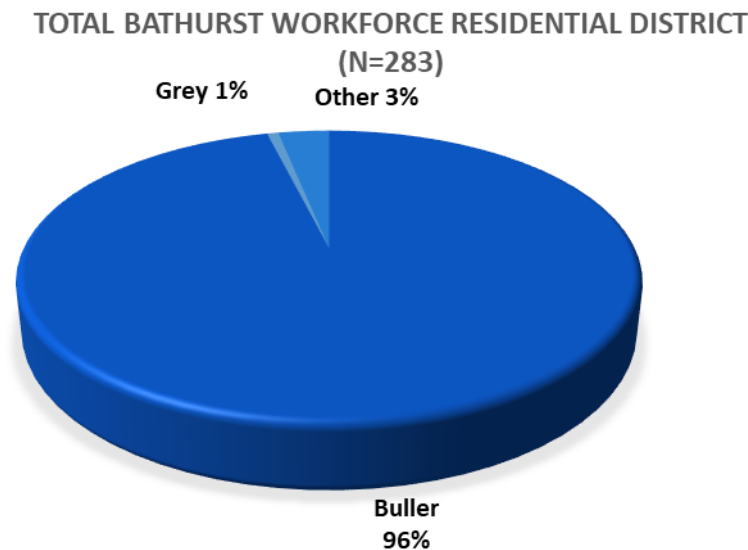
4.5.3 Workforce residential district (district council area)

A further measure of the extent to which the workforce is embedded in the region is the Local Authority area in which they reside. Residence in the relatively close proximity to the mine implies a level of participation in the local community, through a range of social activities and in the local economy, via regular household activity. These characteristics are investigated in greater detail in subsequent sections of the survey report.

The data on residential location demonstrates a very high concentration of residency in the immediate surrounds of the operations which this survey canvassed, with 96% of workforce respondents (Figure 13) living in the BPCP Buller primary regional area. This is interpreted as adding support to conclusions on the specialisation of mine employees and their decisions to reside close to suitable employment. The relative geographic isolation of the West Coast and its component district council areas must also be recognised as a contributing factor to this workforce characteristic⁵⁴. This isolation is also a factor in terms of practicality for employees, in terms of fatigue management and 'journey to work' time, for example.

⁵⁴ The actual proportion for Grey District in Figure 13a is 0.4%.

Figure 13



4.5.4 Workforce residential location – Westport and surrounds

Westport is the ‘natural’ residential centre for Bathurst’s West Coast workers, being the nearest township to Stockton Mine, and the other parts of the Buller Plateaux forming parts of the Project. All other settlements in the BPCP Buller primary regional area are small. Although detailed survey data did indicate that some workers live in these smaller settlements, workers’ homes were mainly clustered around Westport, as the Buller District’s commercial centre. This is discussed in more detail in Section 2.4.1.

Figure 14 demonstrates the effect of this proximity on the residential location of both employees and contractors. 84% of the workforce sample lived in Westport or its immediate surrounds, within the BPCP Buller primary regional area. As will be substantiated in subsequent analyses, this has a significant positive impact on the social functionality and economic prosperity of Westport, and, as the largest settlement in the BDC council and BPCP primary regional areas more generally. These impacts therefore also contribute to the broader economic circumstances of BPCP West Coast secondary regional area. These analyses will also demonstrate reasonable levels of social contributions that workers and their households make to the local community. These economic and social engagements serve to improve the cohesion, wellbeing and prosperity of Westport as the main population, commercial and administrative centre of BDC council area, and as the effective centre of the WCRC council area mining industry, given its proximity to Buller Plateaux operations, which are the largest in the West Coast Region.

In terms of the relative regional and district scale of Bathurst’s employment, it is noted that the BPCP is projected to maintain similar employment levels to those for current Stockton Mine operations. The Project will employ a full-time equivalent workforce of 317 direct employees and 71 contractor employees (that is, 388 positions in total). These are equivalent to current employment



levels. Compared with the most current Buller District and West Coast Regional council area data⁵⁵, the BPCP would account for:

- For BDC, as the BPCP primary regional area, 75.5% of filled jobs in the BDC mining industry; and 8.6% of all BDC filled jobs.
- For WCRC, as the BPCP secondary regional area, 55.7% of filled jobs in the WCRC mining industry; and 2.3% of all WCRC filled jobs.

By comparison, the New Zealand mining industry accounts for 0.2% of New Zealand's total filled jobs. In this context, mining employment is a relatively significant industry at the BPCP primary and secondary regional area levels, when compared with New Zealand as a whole.

Industry structure information for employment is aggregated to ANZSIC Level 1 industry groups. This precludes direct comparison between the BPCP and other existing individual businesses which are large employers. However, based on the data most recently published by Infometrics (2025)⁵⁶ excluding the mining industry, BPCP, with a workforce of 388, would employ more workers than:

- 15 of the other 18 industry groups in BDC council area.
- 5 of the other 18 industry groups in WCRC council area.

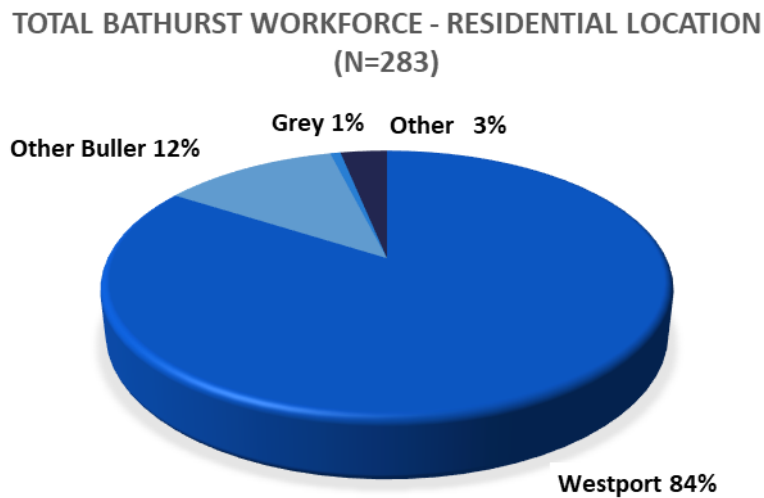
This is a further indicator of the significance of the BPCP within the Buller primary and West Coast secondary regional areas.

In the context of a single business entity operating in the BPCP Buller primary regional area and the West Coast secondary regional area, these are significant contributions. While Stockton Mine and the BPCP have positive socioeconomic implications while operating, the relative scale of these data also indicates the vulnerability of the BPCP West Coast secondary regional area, and the BPCP Buller primary regional area in particular to the eventual end of mining. The BPCP would delay this eventuality, and therefore facilitate the planning and actions required to achieve a satisfactory transition to the both the BPCP primary (Buller) and secondary (West Coast) regional areas' post mining futures.

⁵⁵ Source: Infometrics 2025.

⁵⁶ The data are for the year to March 2024.

Figure 14



4.5.5 Workforce household characteristics

Sections 4.5.2 to 4.5.4 establish that a substantial part of the workforce is long-term resident in the BPCP West Coast secondary regional area, and more specifically in Westport and its immediate surrounds, within the BPCP Buller primary regional area. Figure 15 shows the housing tenure status for the workforce and its constituent parts. There was a greater proportion of contractors renting their places of residence (25.5%) than is the case for employees (19.9%). Employees are more likely to own or to be buying their homes under mortgage (80.1% compared with 74.5% for contractors). These are to some extent expected outcomes, particularly in light of the relationships between work and residential tenure (Section 4.5.2).

Home ownership is generally associated with positive socioeconomic outcomes. New Zealand Housing Foundation research findings are that *‘Homeownership, as opposed to renting, is often significantly associated with positive health, crime, and educational outcomes in studies, usually even after controlling for a range of variables including socio-economic status and income. This means that the findings pertaining to better outcomes as a result of greater security of tenure, either through rental or ownership, cannot simply be discounted on the basis of the wealth of the household’*⁵⁷.

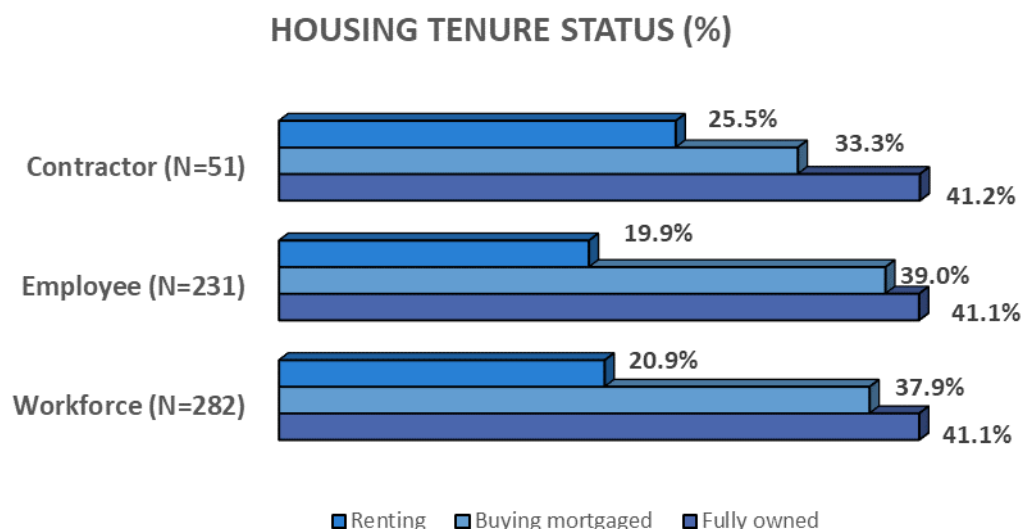
Similarly, Motu Research (2011) found that *‘home-ownership exerts considerable positive impact in the formation of social capital in New Zealand communities’*; and *‘homeowners have an incentive to engage in the local community in order to preserve or enhance the value of their housing asset’*⁵⁸.

The various primary data (survey and stakeholder interviews) provide evidence that this is the case in the BDC and WCRC areas.

⁵⁷ <https://www.treasury.govt.nz/sites/default/files/2024-05/pc-ing-fcfa-sub-027-housing-foundation.pdf>

⁵⁸ <https://www.motu.nz/our-research/urban-and-regional/housing/homeownership-and-social-capital-in-new-zealand>

Figure 15



Other survey data produced evidence of a level of worker turnover, based on the relatively large proportion of workers who had been employed in their current job for relatively short periods (73% for 0 to 5 years, and 89% for up to 10 years). The change in housing tenure status between the previous workforce survey in 2018 (refer to Section 4.1) and the 2023 survey also provides supporting evidence. A comparison of data from the two surveys is presented in Table 12. The changes in ownership under mortgage and renting have changed significantly for employees in particular. There are several potential explanations for these changes, including workforce turnover as noted, and also increases in the worker households having moved between ownership under mortgage, and full ownership.

Table 12: Comparison of housing tenure survey data 2018 & 2023 (%)

Table 12: Comparison of housing tenure survey data 2018 & 2023 (%)						
	Fully owned		Buying mortgaged		Renting	
	2018	2023	2018	2023	2018	2023
Employee	33.0	41.1	56.7	39.0	10.3	19.9
Contractor	25.9	41.2	44.4	33.3	29.6	25.5
Workforce	31.5	41.1	54.1	37.9	14.4	20.9

4.5.6 Workforce investment in housing

Table 13 estimates the investments of workforces in owner-occupied properties within the BDC and WCRC council areas. Table 13 couples housing status with mean house values to demonstrate the extent to which the workforce is financially invested in the West Coast Region, and by inference, given residential distribution, the Buller District. The average nominal price was obtained from Infometrics data (2025). Because the significant majority of direct and contractor workers living in WCRC council area actually live in the Buller District, the average price for BDC council area (\$369,525) was assumed for estimation purposes. It is noted that individual properties of respondents may be worth more or less than the average values used. Despite this, the use of the



mean price as an assumption of residential value is considered appropriate for developing an indicative assessment.

The breakdown of employee tenure type (counts) is based on the proposed Project workforce of 317 employees and 71 contractors (total mining workforce of 388 people), to which the 2023 survey tenure proportions from Table 19 are applied. The results for the Project are:

- 98% of Bathurst employees live in the WCRC council area, which for the Project is 311 people.
- 90% of contractor employees live in the BDC council area, which for the Project is 64 people.
- 96.7% of the total workforce lives in the BDC council area, which for the Project is 375 people.

It is noted that the estimates in Table 13 should be considered as being contingent. This is due to the fact that BDC and WCRC council areas' property markets are likely to fluctuate significantly over the duration of the Project. Pricing will vary over the period, as may the balance between availability of properties available for purchase and rental in the BPCP primary and secondary regional areas. The use of the mean property price accounts for variations as between individual properties (size, age, location, condition etc.), to some extent. As a result, the assessments are included for information only.

Table 13: Indicative workforce investment in residential property

Table 13: Indicative workforce investment in residential property						
Price assumption	Mean price BDC 2024					
	\$369,525					
	Fully owned		Buying mortgaged		Total invested	
	Count	\$ value ('000)	Count	\$ value ('000)	Count	\$ value ('000)
Employee	128	47,299	122	45,082	250	92,381
Contractor	27	9,977	22	8,130	49	18,107
Workforce	155	57,276	144	53,212	299	110,488

Data source: Aigis Group 2025⁵⁹; Infometrics 2025; Bathurst workforce survey 2023.

Indicatively, the workforce may have around \$110 million invested in principal places of residence, based on the assumptions set out above. Mining industry workforces are often perceived as having comparatively high levels of mobility, with workers prepared or able to work remotely from their place of residence (e.g. fly-in, fly-out [FIFO] and drive-in, drive-out [DIDO] employment). This is evidently not the case for a substantial proportion of Bathurst's West Coast workforce, however it may apply to some proportion of the construction workforce during the relevant stages of the Project. The comparatively small scale of New Zealand's coal mining industry and its geographic concentration in distinct resource-rich areas of the country, such as the West Coast Region, are contributing factors to the evidently lower level of labour mobility characterising this workforce, than is the case internationally.

⁵⁹ BPCP Economic Impact Assessment



4.5.6.1 Indirect economic benefit of owner-occupied housing

In addition to the investment in the purchase and occupation of workforce members' homes, these households also typically spend on the upkeep, maintenance and in some instances capital improvement of their dwellings. This spending is assumed to vary depending on the age and condition of an individual property. Other factors may also influence the level of spending, such as availability of labour and materials. This may be particularly relevant in the case of the BPCP Buller primary regional area, given its small population and relative isolation. These locational factors may also increase the likelihood that activity would involve local or regional suppliers and contractors. Indicatively, these costs may be in the order of 0.5% to 2% of the house value (excluding land) per year⁶⁰.

4.5.7 Workforce rental activity

In addition to the workforce's proprietorial investment in real estate, members of the Bathurst workforce who are renting residences in the BPCP primary or secondary regional areas make a further contribution to the regional economy. Given the relative isolation of the West Coast Region, it is likely that some proportion of rental property stock is also owned by residents of the BPCP Buller primary and West Coast secondary regional areas, some of whom may also be Bathurst employees. Table 14 quantifies rental contribution, based on annualised average nominal weekly rents for WCRC and BDC council areas. The assessment is based on mean rent data for 2024, published by Infometrics.

Table 14: Indicative workforce rental expenditure on residential property

Table 14: Indicative workforce rental expenditure on residential property						
Rent	Buller 2024					
Weekly	\$403					
Annualised	\$20,956					
	Employee		Contractor		Workforce	
	Count	\$ value ('000)	Count	\$ value ('000)	Count	\$ value ('000)
Totals	62	1,299	17	356	79	1,655

Data source: Aigis Group 2025; Infometrics 2025; Bathurst workforce survey 2023.

Renting employees may contribute around \$1.7 million per year into the BPCP primary and/or secondary regional areas noting (as above) that some proportion of rental stock is likely to be owned by residents of the BPCP primary and secondary regional areas. Table 15 provides an estimate of cumulative rental activity. This assumes total annual rent from Table 14 and the average industry tenure of renting employees of 5.6 years (extracted from the survey data).

⁶⁰

https://www.google.com/search?q=How+much+does+the+average+NZ+household+spend+on+home+maintenance%3F&oq=How+much+does+the+average+NZ+household+spend+on+home+maintenance%3F&gs_lcrp=EgZjaHJvbWUyBggAEEUYOdIBCjlxMjk4ajBqMTWoAgiwAgE&sourceid=chrome&ie=UTF-8



Table 15: Indicative annualised rent x industry tenure

Table 15: Indicative annualised rent x industry tenure

Total workforce rent p.a.	Average industry tenure, renters	Total rental estimate
\$1,655,000	5.6	\$9,268,000

Over an average period of employment of approximately 5.6 years, Bathurst workforce members who rent are estimated to potentially contribute around \$9.3 million to the economies of the BPCP primary and secondary regional areas. As noted above, it is likely that some proportion of this economic benefit accrues to the BPCP primary or secondary regional area residents who own properties that are rented by mine workforce members. Generally, it is assumed that a reasonable part of the rental incomes for these properties would be used to repay any financing of the property. However, as noted in Section 4.5.6.1, some income would be spent in the BPCP primary and secondary regional areas' economies on maintenance and upkeep, for example, which would further support the socioeconomic benefits relating to the additional activity and employment supported, as identified by the OECD (SIA, Section 3.2.1) and MBIE (SIA, Section 4.4.1).

Because the numbers of employees and contractor workers are projected to remain relatively similar to current levels, so too the existing structure of workers' owner occupation and rental tenancy is assumed as likely to remain relatively comparable. It is noted, however, that at least some level of variance will occur over time, such as those relating to frictional effects of individual workers commencing or leaving employment with the Project.

Section 6.4.3 discusses the implications of the shorter-term increases in workforce size during construction stages of BPCP. Section 6.4.3 reports that these stages are assessed as possibly introducing pressures into the housing market in Westport in particular, although research conducted by Bathurst does suggest that these effects may be managed within existing capacity in the BPCP Buller primary regional area.

Household composition data (Table 16) also demonstrate some differences between the employee and contractor groups. However, these may not be as significant as may be expected and generally, the larger groups (living with a partner and living with a partner and children) were relatively similar. In summary:

- There is a larger proportion of contractors living alone (22.4% compared with 15.1% for employees), which is interpreted as a predictable outcome, as some of these may be DIDO workers, for example.
- Contractors were also more highly represented in the group 'living part time with other family', although the significance of this is unclear.
- Around 8.6% of employees lived in share houses, whereas no contractors reported doing so. The survey data also included a question on whether multiple people in the same household worked for the same employer. There were a small number of these for the employee sample, indicating that multiple Bathurst employees occupy some share houses.



Table 16: Household composition data

Table 16: Household composition data			
	Workforce (N=281)	Employees (N=232)	Contractors (N=49)
Alone	16.4%	15.1%	22.4%
w/partner	32.4%	32.8%	30.6%
w/partner & kids	34.9%	34.9%	34.7%
w/other family	6.4%	6.5%	6.1%
Part-time w/other family	2.8%	2.2%	6.1%
Share house	7.1%	8.6%	0.0%

Figure 16 presents a breakdown of age groups within households of the Bathurst West Coast workforce. Figure 17 provides a comparable breakdown for the general population of BDC and WCRC council areas. The age groupings for the survey-generated data in Figure 16 differ from those based on Census data which are presented in Figure 17. Most specifically, the younger age groups (ages ranging from 0 to 24 years) do not match identically, with some differences between these.

The workforce age distribution (Figure 16) is clearly distinguished from BDC and WCRC council areas' age distributions (Figure 17). This is particularly evident through the higher proportion of younger residents (approximately 33%) associated with the Bathurst workforce households, compared with BDC council area (approximately 22%) and WCRC council area (approximately 26%). Conversely, the older population for workforce households (13.7%) is significantly lower than the corresponding data for BDC council area (approximately 56%) and WCRC council area (approximately 47%). This is further demonstrated by comparing household sizes for the workforce (2.8 people per household) and BDC/WCRC council areas (2.3 people per household). Clearly, older households are less likely to have resident children, and these older households are more prevalent in the general population of the two council areas than in the workforce-aged households surveyed.

Figure 16

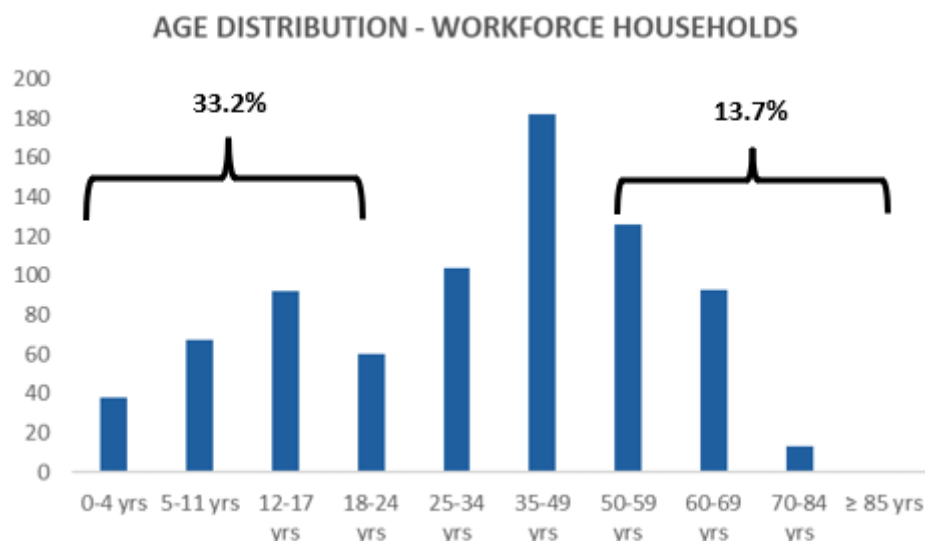
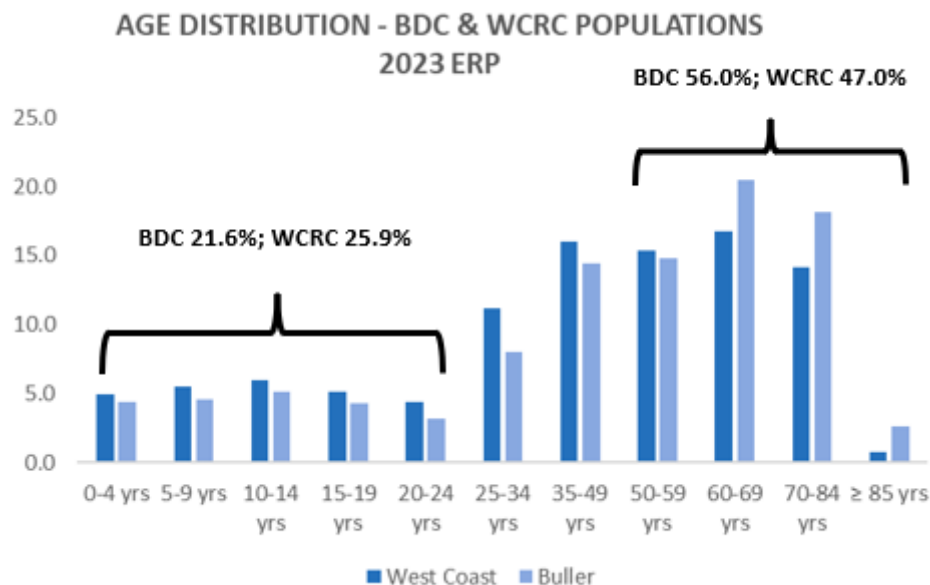


Figure 17



Caution is necessary in comparing the data for the younger age groups due to the identified differences in aggregations. However, as Figures 16 and 17 indicate, there is a significantly larger proportion of younger people aged up to 24 years resident in the workforce households. This finding is consistent with the larger average household sizes for Bathurst workforce members compared with the WCRC and BDC council areas generally.

A total of 775 people resided in respondent workforce members' households at the time of the survey. They are direct beneficiaries of the employment provided by Bathurst, and the social and economic stability that is supported by workers' incomes. As recognised by the OECD, the benefits of family and/or household financial stability extend to the capacity for social inclusion and achievement of personal aims. The numbers of these residents will naturally vary over time. There may also be a temporary increase in the number of other members of workers' households during the construction stage, although the propensity for this cannot be assessed with any certainty, as it is dependent on the decisions of individual households and their household compositions.

4.5.8 Workforce expenditure in the BPCP primary and secondary regional area economies
The estimated numbers of BPCP workers who will live in the three regional areas are:

- West Coast Region – 375 workers.
- Buller District – 372 workers.
- Westport area – 326 workers.

SIA Section 3.2.1 and SIA Section 4.4.1 identified the positive effects of work, as defined by OECD and MBIE, respectively. A key element of these benefits is the incomes earned by worker households, and the positive effects these have on the individual household and on the socioeconomic engagements of these households in their local communities.



As has been observed in relation to other workforce characteristics, the relative isolation of the Buller District and the West Coast Region council areas generally, is likely to result in residents spending comparatively large proportions of their disposable incomes in the BPCP primary or secondary regional areas, due to the relative lack of convenient access to alternative options. For example, Westport, where the majority of the Bathurst West Coast workforce resides, is approximately 100 kilometres from Greymouth, which is the largest settlement and commercial centre in WCRC council area⁶¹.

Detailed assessments of the economic effects of employment for the Project are presented in the EIA lodged with the AEE. The EIA also compares outcomes under the Project and those in the case that BPCP does not proceed. Given the link between work and advantageous economic and social outcomes, it is appropriate to summarise some of the EIA data on income for the purposes of the SIA.

4.5.8.1 Gross and after-tax incomes

These compare with reported mean annual earnings⁶² of \$71,097 for WCRC and BDC council areas.

Converted to after-tax incomes, the EIA estimates are \$67,000 for Bathurst employees and \$61,000 for contractor workers. For the mean regional income, after-tax income is approximately \$47,600 per worker. The estimated after-tax wage premium of Project employment is around \$19,000 (Bathurst employees) and \$13,000 (contractors) per year more than the regional average.

Compared with average income measures for WCRC and BDC council areas, these higher incomes generate greater aggregate income in the region. This in turn supports further economic activity and thus increases the distribution of the social benefits identified by OECD and MBIE, across other parts of the BPCP primary (Buller) and secondary (West Coast) regional area communities and economies.

4.5.8.2 Disposable income and local expenditure

Workforce survey responses from Bathurst employees identified an average of 57% of their 'take home pay' being spent in their local economies, where they live within the BPCP primary or secondary regional areas. For contractor survey respondents, the proportion was 53.3%. Combining these, the BPCP EIA includes an estimate of workforce disposable income (employees and contractor workers) of around \$19.2 million annually⁶³. When adjusted for the reported proportions spent in the BPCP primary or secondary regional areas, this totals around \$10.8 million in each year of the

⁶¹ Greymouth is located in the Grey District Council area.

BPCP. As noted in Section 4.5.8 and other sections of the SIA in relation to MBIE and OECD analyses, work and the associated incomes contribute to the social, as well as economic wellbeing of households.

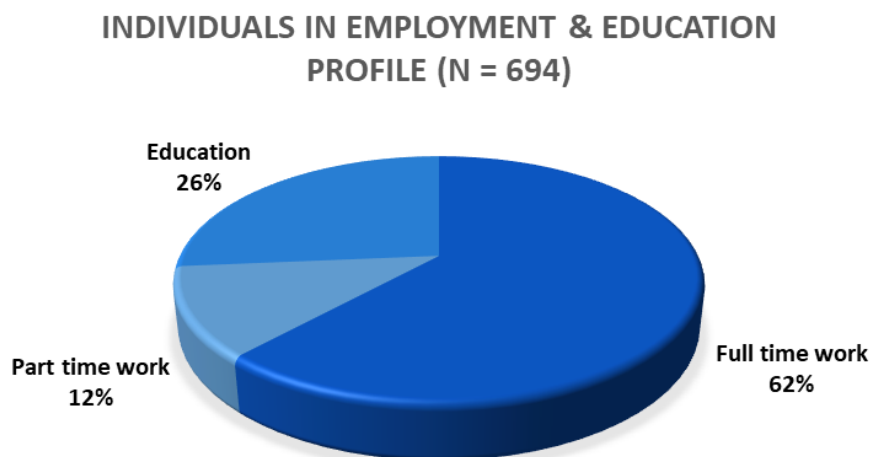
Incomes and the expenditure they support are recurrent, and thus support the economy annually, noting that the construction stage is shorter than the duration of the total mining program and therefore these impacts will only apply during that stage⁶⁴. Subject to possible changes in workforce size over the course of the Project, the socioeconomic benefits of mining-related incomes would be sustained over the longer period proposed under the Project, namely, over 20+ years.

The relative economic scale of Bathurst’s business in the BPCP Buller primary and West Coast secondary regional areas, particularly as an employer, results in no apparent substitute industry or sector of comparable scale being present, to support such a level of direct employment and related positive derived effects in the BPCP primary and secondary regional areas.

4.5.9 Employment and education participation

Approximately 89.5% of the 775 household members associated with the Bathurst workforce sample are engaged in education as enrolled students or are engaged in full time or part time employment. The breakdown of the data for those employed or participating in formal education is presented in Figure 18.

Figure 18



The breakdown of household members associated with the Bathurst workforce that participate in employment and education indicates a relatively small proportion of part-time employees compared with full-time employees. The 26% of residents in the sample who are in education are generally likely to be young people, and particularly children in early childhood and school education. As

⁶⁴ There are two construction stages within the Project program, currently scheduled from 2026 to 2028 and 2030 to 2031.



identified in Figure 16, around 33% of workforce household occupants are 24 years or younger, and 25% are aged between 5 and 17 years, which approximates compulsory school age.

Collectively, approximately 66% of the total of non-mining household members and 84% of the respondent sample, such as partners and adult children, are employed either full-time or part-time in the BPCP primary or secondary regional areas. These household members make further economic contributions to those noted for direct and contract Bathurst workforce members, as they support further employment in related industries and businesses in the BPCP Buller primary and West Coast secondary regional areas. These people are also likely to enjoy the social benefits of employment (SIA, Sections 3.2.1 and 4.4.1) and these may effectively be increased by households having more than one income. The Project would contribute to maintaining these socioeconomic benefits over the longer proposed life of mine, as compared with the base case.

4.5.10 Community participation

Members of a resident workforce such as Bathurst's are often contributors to, and/or participants in the local communities in which they live. This includes volunteering as well as various involvements with other organisations such as sport, arts and cultural groups. Generally speaking, these community contributions are not quantitatively valued, yet they remain tangible contributions, that in the absence or departure of an individual or household engaged in such roles, may require their replacement by another person or people, as noted in Section 4.2.

At a national level, Stats NZ (2017)⁶⁵ valued such contributions for 2016 in the following terms: *'Volunteers contributed over 13.5 million hours for organisations over the previous four weeks. At the current minimum hourly adult wage rate of \$15.75 an hour, this would equate to over \$213 million every four weeks'*^{66,67}.

Although they are largely qualitative, the social benefits of such participation are also significant. StatsNZ reports that *'Kiwis who belonged to a group, club, or organisation were more likely to rate their overall life satisfaction as 'high' (85 percent) than those who did not belong (80 percent). Similarly, those who belonged to a group were more likely to feel that the things they do in life are worthwhile (90 percent compared with 84 percent who did not participate)'*⁶⁸.

In the context of these data, on a BPCP Buller primary regional area scale in particular, the Bathurst workforce makes valuable contributions to the communities in which the workforce resides. Table 17 summarises the nature and extent of these contributions. In total, 112 respondents (39% of the survey sample) provided 170 responses across all categories of community involvement and reported that their households participated in 271 activities in their area of residence noting the concentration of these in the BPCP Buller primary regional area. These activities ranged from sports to community services and general recreational groups.

⁶⁵This report remains available on the StatsNZ website (2024).

⁶⁶ <https://www.stats.govt.nz/reports/volunteering-and-donations-by-new-zealanders-in-2016>

⁶⁷ The data are based on the output of the 2016 General Social Survey.

⁶⁸ <https://www.stats.govt.nz/reports/kiwis-participation-in-cultural-and-recreational-activities>



Table 17: Summary of workforce community engagement (N = 112)

Table 17: Summary of workforce community engagement (N = 112)			
Category	Example organisations/activities	Number of respondents	Number of engagements
Sports	Rugby, netball, cycling & specific sports clubs.	69	150
Service	SPCA, Surf Lifesaving Club, charities.	16	16
Community	Playgroups, Council.	14	20
Recreation	Rifle Club, Fishing Club.	11	10
Emergency Services etc.	Civil Defence, LandSAR, Fire & Emergency NZ.	39	53
Cultural	Music, dance, theatre groups etc.	10	10
Social (clubs etc).	Workingman's club, RSA etc.	1	1
Schools	School Board, Parents Group etc.	7	7
Mining industry	Mines Rescue.	3	3
Totals	-	170	271

Figures 19 and 20 illustrate the distribution of responses in regard to community contributions and participation. Figure 18 presents percentages for a count of responses for each category by survey participants. As previously noted, approximately 40% of workforce households are actively involved in their communities, in particular multiple sports clubs, and other bodies in the BPCP Buller primary regional area in particular. The differences in proportions for involvement in sport between Figures 19 and 20 are a consequence of respondents and/or their households being involved in multiple sports, which is evident in the larger proportion for sports in Figure 20, compared with Figure 19. This result is not as apparent for other engagement categories.

Emergency services are the second-largest group in terms of the number of respondents and the number of engagements with emergency services organisations. These forms of volunteering provide essential services to the community in times of need. Such roles also involve a level of training and subsequently accumulated experience, which can impose a significant cost of replacing the volunteer in the organisation. For example, training a St John event volunteer requires approximately six months⁶⁹. The community's view on the value of these contributions is addressed in Section 5.3.

⁶⁹ <https://www.stjohn.org.nz/What-we-do/What-we-do-at-a-glance/What-we-do-FAQs/Volunteering-at-events-FAQs/>

Figure 19

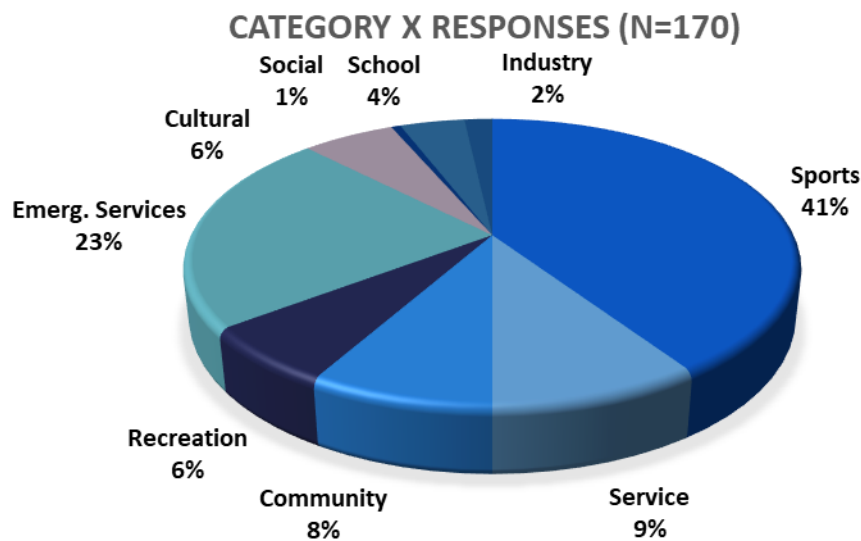
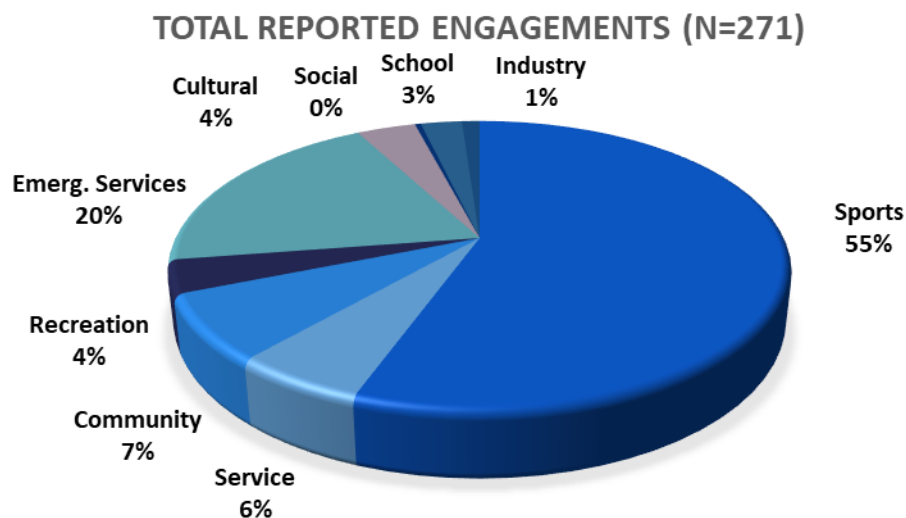


Figure 20



4.6 Summary of survey results and related data

The survey results presented allow an overall description of the workforce as a whole, which can be summarised through the following observations:

- The workforce is 'younger' than the WCRC and BDC council area populations, as a whole, which is to be expected. Workforce members have larger households, with more children on average than the general population. Both of these outcomes are natural consequences of a comparison between a 'working age' population and a general population.
- The average time spent working in the industry would suggest a workforce with specialised skills, which may not otherwise be fully employed in the BPCP Buller primary or West Coast secondary regional areas' labour markets. In the absence of mining at Stockton Mine and in



the longer term, the proposed BPCP, this may exacerbate the existing level of employment underutilisation in the BPCP primary and secondary regional areas.

- In terms of the workforce's ties to the communities in which they live, several measures demonstrating a strong residency profile were shown by the survey; time living in the current residential location (average of 22 years); the proportion of investment in the principal place of residence ($\approx 79\%$ either own or are purchasing); engagement in the community (40% of the surveyed workforce actively involved); and the number of workers' households with other members either employed or in education (90% of respondent workers' households).
- The data on community participation demonstrate that along with being economically active in BPCP Buller primary and West Coast secondary regional areas, the workforce is socially engaged in its communities. These engagements involve a range of activities from emergency services organisations to community and cultural groups and sports clubs. In this way, a significant proportion of Bathurst's workforce contributes to social cohesion and community wellbeing, across the West Coast Region, noting, however, that much of this activity is concentrated in the BPCP Buller primary regional area.
- Taken in the context of the relationship between the economic and social benefits of employment (as acknowledged by the OECD and MBIE, for example), the workforce should be considered as making a significant contribution to BPCP Buller primary regional area and the BPCP West Coast secondary regional area.

5 Community views on the role and contribution of Bathurst and Stockton Mine

5.1 Stakeholder engagement, November & December 2023

As stated in Section 2, primary research for Bathurst operations included structured interviews⁷⁰ with stakeholders during November and December 2023, which were organised by Bathurst. The aim was to obtain stakeholder perspectives on the community's views, and insights on the role of Bathurst in the BPCP Buller primary and West Coast secondary regional areas more generally. The information was gathered for use in subsequent consenting application activity for Stockton Mine, resulting in its use in the current FTAA application. Various parties were interviewed on the basis that they could contribute to informing a collective, representative view of how parts of the community view Bathurst. However, it cannot be inferred that the views reported in this section conclusively represent those of the entire BPCP Buller primary and West Coast secondary regional area communities. It is noted that this is a limitation of any sample-based research method.

In addition to the small proportion of the community that the interviewees represent, it is also acknowledged that there may be or have been some actual or perceived selection bias with respect to identifying some of the parties interviewed. Despite this, it remains that as an exercise in gathering information and insights on social impacts, the responses provided by interviewees are considered to remain legitimate, by virtue of these being the stated views of the organisational representatives or individuals interviewed. As part of conducting such research, it is accepted by the researcher that responses provided are based on professional and/or personal assessments, as may apply to each interviewee. Therefore, because the material reports on the stated views of organisational representatives and individuals, it cannot be validly controverted.

Table 18 identifies the organisations approached. It is noted that the organisations include elected representatives of West Coast Regional Council and its three constituent District Councils (Buller, Grey and Westland). It is considered that these parties in particular were able to provide input on the prevailing views of their respective constituencies.

Certain statutory organisations, such as the Department of Conservation (DOC), were not interviewed as part of this series of engagements. DOC is one of the nominal landholders on the plateaux. As such, Bathurst is in frequent contact with DOC in relation to current and proposed BPCP operations. The same circumstance applies to Land Information New Zealand, in relation to Bathurst's management of legacy acid mine drainage (AMD). Bathurst's position was that engagement as part of this process was unnecessary in this context.

⁷⁰ That is, each interview was conducted using the same set and ordering of questions.



Table 18: List of organisations interviewed, November/December 2023

Table 18: List of organisations interviewed, November/December 2023	
Organisation	Description
Buller Basketball/SME (Photo Patch)	Sports organisation; business
Buller Chartered Accountants	Business
Buller District Council	Territorial Authority (staff)
Buller District Council/ Kawatiri Health	Territorial Authority/ Health service (elected representative/board member)
Buller Electricity	Business/utility
Buller High School/Buller District Council	Education/Territorial Authority (staff/ elected representative)
Civil Defence	Emergency Services
Cosmopolitan Hotel	Business
Development West Coast	Public Agency
Doug Hood Mining	Business (Bathurst contractor)
Fresh Choice Supermarket	Business
Grey District Council	Territorial Authority (staff/elected representative)
Homebuilders	Charitable Trust
LandSAR	Emergency Services
MBC	Business (Bathurst contractor)
Mitre 10/Harness Racing Club	Business; sports organisation
New World Supermarket	Business
NZIMMER	Public Agency
OCS	Business (Bathurst contractor)
PERC/Westreef	Public infrastructure; business
Property Brokers	Business
Ray White	Business
SGS NZ	Business (Bathurst contractor)
St Canice's Catholic School	Education
St John Ambulance	Emergency Services
Talleys	Business ⁷¹
West Coast Regional Council	Regional Authority (staff/elected representative)
Westland District Council	Territorial Authority (staff/ elected representative)
Westport North School	Education
Westport South School	Education

⁷¹ Talleys Group is a joint venture partner in BT Mining. Talley's Westport seafood processing plant is the business unit referred to here.



5.2 Statistical summary of engagement outcomes

A statistical summary of the interview outcomes is included in Table 19. It summarises the matters raised, and the frequency with which they were addressed by the various interview participants. This approach was preferred to providing more detailed information on stakeholder views, because the interviews were aimed at investigating Stockton Mine operations generally, and *did not* specifically address the specifics of the BPCP. The interview outputs remain important to assessing the Project, as they contribute to understanding of the base line situation, against which the Project and the counterfactual case are compared.

5.2.1 Summary observations from community interviews

Overall, the community representatives generally indicated that Bathurst plays a positive role in supporting the BPCP Buller primary and West Coast secondary regional area communities. Because of the range of organisations approached and their different roles in the communities in which they are involved, this support was seen from differing perspectives, by different stakeholders. These perspectives were based on interactions with Bathurst and its workforce. These interactions included direct contributions, including financial and in-kind community support, including substantial contributions to social capacity, such as to medical and educational services. This was particularly apparent for the BPCP Buller primary regional area. The indirect advantages of having a large employer as part of the BPCP Buller primary regional area, paying comparatively high incomes, were also considered positive, particularly from the perspective of business owners, who identified economic onflows to their businesses. Other important contributions were also emphasised, including the provision of competent personnel and equipment in emergency management situations, and maintaining enrolments in schools within the BPCP Buller primary regional area.

Thirty percent (30%) of participants identified being aware of some negative sentiment in relation to mining, within the BPCP Buller primary regional area particularly. This was reported as being exclusively related to the environmental effects of mining. Some also personally raised such impacts but acknowledged that these are unavoidable outcomes of mining. In each instance, the relevant participants expressed views that the adverse social and economic effects of the absence of Stockton Mine (i.e. if it was not operating) would be greater than the adverse impacts of the mining operation. Therefore, the prevailing view was that the continuation of mining, as proposed in the BPCP, would be positive for the BPCP Buller primary, and West Coast secondary regional areas.

This outcome is relevant to consideration of the precautionary and uncertainty principles discussed in Section 2, as they apply to the Project. The former requires that *'the lack full certainty on impacts should not be used as a reason or not requiring the implementation of mitigation measures and stringent monitoring'*⁷² for approval, whereas the latter acknowledges that full knowledge (i.e. certainty), can *'never'*⁷³ be achieved, because of the nature of social phenomena.

⁷² Vanclay (2003)

⁷³ *ibid.*



In applying these concepts to assessing the Project, a fundamental characteristic of the BPCP is that it represents the continuation of a longstanding and currently operational industrial activity in the Buller District and West Coast Region. As such, the potential positive and negative impacts of the Project are well understood within these communities. This accumulated knowledge has provided a key input into the planning of the Project, to the effect that the impacts of the Project are likely to be consistent with those created by previous and current activity on the plateaux.

Viewing the interview outcomes on balance, it is concluded that the WCRC and BDC communities hold generally favourable views of mining as an important historic, current and future industrial contributor to Buller District and the West Coast Region council areas generally. In these respects, there was substantial evidence to conclude that Bathurst has established a ‘Social Licence to Operate (SLO)’ in the BPCP primary and secondary regional areas. Given the effective continuity of impacts that would result from the proposed Project, it is assessed as likely that that this SLO can be maintained over the extended LOM proposed for the BPCP, assuming that the established relationships with the existing BPCP Buller primary and West Coast secondary regional area communities are maintained.

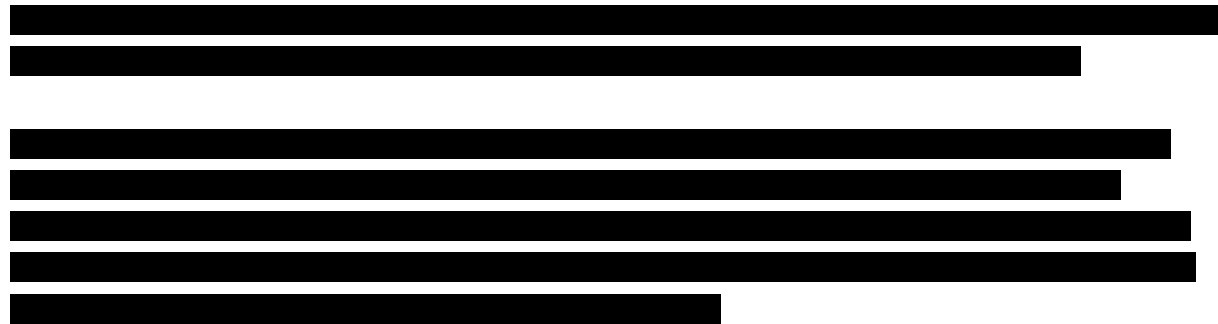


Table 19: Statistical summary of matters discussed in stakeholder interviews – November/December 2023

Table 19: Statistical summary of matters discussed in stakeholder interviews – November/December 2023		
Summary descriptions of matters discussed	Count	% of respondents mentioning matter
General support	29	96.7
Positive for organisation	26	86.7
Positive economically	28	93.3
Positive socially	26	86.7
Critical to economic base	11	36.7
Scale effect of extractives businesses	11	36.7
Positive effects of employee numbers and incomes	17	56.7
Extractives resident workforce is beneficial (vs. FIFO/ DIDO)	6	20.0
Employment opportunities (includes apprenticeships etc.)	12	40.0
Related employees (parent/ partner etc in extractives)	8	26.7
Inter-industry support	2	6.7
Direct economic contributions to organisation/s (as supplier etc.)	11	36.7
Indirect economic contribution to organisation	11	36.7
Direct support to organisation (donations etc.)	7	23.3
Cash/ other contributions to community, events etc.	10	33.3
Need to compete with extractives on employment benefits	5	16.7
Non-cash contributions (e.g. floods), employee volunteering etc.	11	36.7



Summary descriptions of matters discussed	Count	% of respondents mentioning matter
Adverse effects on organisation if no mining/ extractives	28	93.3
Adverse effect on district/ region if no mining/ extractives	29	96.7
Potential service/capacity loss (Midland Rail, air service, port, health & education, electricity costs etc.)	13	43.3
Positive comparison with effects of with Solid Energy demise and/or Holcim departure	15	50.0
Effects on property markets and values	11	36.7
Positive comments on Stockton product and lower emissions use	10	33.3
Positive comments on rehab/ecological etc. performance	10	33.3
Relative scale of mine/ quarries etc in regional land use context	5	16.7
Adverse effects (environmental etc.) argument against extractives	9	30.0
Absence of alternative/ substitute industry/ies	27	90.0
Eventual closure and transition as focus	7	23.3
Observed majority community view is positive	26	86.7
Aware of negative views	15	50.0
Bathurst better performance than previous operators/ other extractives operators also improved	4	13.3
Industry is a good corporate citizen (SLO)	6	20.0
Bathurst & industry could 'tell its story better'	9	30.0



5.3 Bathurst direct stakeholder engagement⁷⁶

Bathurst has initiated a program of engagement with a wide range of stakeholder groups in relation to the BPCP. At the time of finalisation of this report, this program was continuing. Engagement for the Project is necessarily an iterative process. This is a result of the evolution of the Project through the FTAA application development process. It is noted that some of the changes through this process are consequent to the outcomes of engagements with some of the identified stakeholder groups, and with government and statutory authorities, which are charged with the protecting the public interest. With respect to a number of these groups, the Project engagement process is expected to establish channels for communication as the Project progresses if approved.

Engagement with regulators is being undertaken as part of Project development. These engagements principally relate to technical matters, which are addressed in the AEE technical reports in respect of each matter. Similarly, commercial engagements with plateaux infrastructure owners (for example) are also not reported in detail.

5.3.1 Engagement with stakeholder groups

Table A6.1 (Annexure 6) details the groups that have been addressed, the status of each engagement, and comments relevant to social impacts where these have been provided at this stage. As noted, this process is incomplete, which is reflected in the missing detail for some reported engagements. Despite this limitation, Table A6.1 demonstrates the breadth of groups being engaged, with the aim of procuring a range of views on the Project. It is also noted that the Stakeholder Engagement Report (SER) will be completed and submitted as part of the application. The SER provides information on the methodological bases for the engagement program. The outcomes reported in Table A6.1 are based on that methodology. The table also identifies groups with which Bathurst is engaging and in respect of which engagement is insufficiently progressed at present to allow detailed reporting of outcomes.

The aim of the stakeholder engagement strategy is to ensure that effective consultation and engagement has been inclusive of stakeholder groups who have an interest in, are affected by, or potentially vulnerable to the proposed operations, Bathurst developed a comprehensive Stakeholder Engagement Plan (SEP). The SEP provides a broad framework to guide its consultation and engagement activities. Stakeholder engagement has been dynamic in that it has evolved as the

⁷⁶ Information source: Bathurst, March 2026.



project footprint has been refined, findings of specialist and technical assessments have been completed, effects are better understood and in response to questions and feedback by the various stakeholder groups. The key stakeholder groups are listed in Table 20.

Table 20: BPCP Stakeholder Groups

Table 20: BPCP Stakeholder Groups	
Stakeholder Group	Purpose
Stockton and West Coast Employees	Project update Consultation schedule Community feedback
Employee Union Representative	Project update Consultation schedule
Iwi	Effects assessment update Prepare Cultural Impact Assessment
Industry	Effects assessment review to determine impacts / opportunities for industry relating to water, access, and mine operations.
Utility groups	Ensure privately owned infrastructure is protected
Recreation	Minimise effects of mining operations on recreational activities
Environmental Interest Group	Scope of the BPCP and the assessment undertaken, authorisations sought etc.
Heritage	Demonstrate that heritage matters adequately assessed and management strategy in place for LoM
Communities of Interest	Engage with adjacent communities to advise of the BPCP and specific areas of interest and amenity change.
Adjacent Landholders	Identify adjacent landholders in accordance with FTAA requirements.
DOC Concession Holders	Advise concession holders of the BPCP to identify if there are any competing / conflicting interests in concessions held.
Statutory Authorities	Provide overview of the BPCP and identify if there are any potential conflicts arising from the proposed BPCP in relation to recreational fishing, hunting and heritage.
Regulators	Provide overview of the BPCP and engage to seek specific authorisations and permits and agreements required for the FTA approval to be secured.

Recreational access to the plateaux was raised by specific stakeholder groups, and also in workforce engagement. This emphasises both the local importance of this impact, and to an extent the level of integration between Bathurst's people, and the community. Recreational access is a key area of ongoing consultation. The Recreation and Tourism Assessment is discussed in Section 6.5.2.



Engagement with landholders near to the Ngakawau site also resulted in some responses that demonstrate the community's understanding of the balance between positive and adverse effects of current operations and those that the Project will maintain. The Ngakawau site is near to a number of residential properties, and because of its operations (coal receipt and rail loading), is notionally a source of operational impact, such as noise, dust and light impacts. Residences in the area were 'door-knocked'. The four residents who were available to discuss the Project are reported as stating that the Ngakawau site presented 'no issue' to them. However, two residents also identified specific noise impacts, and one made a query about a dust collection monitoring site near their property. In respect of these stakeholders, it is concluded that despite some impacts, overall, the nearby operations do not, on balance, materially, adversely affect these stakeholders.

5.3.2 Community engagement (open)

Table A6.2 (Annexure 6) reports the matters identified by attendees at open community drop-in sessions. Given the location of these sessions, the matters raised were principally in relation to matters of localised interest. These included water management, plateaux access, traffic and transport effects, visibility of Project elements and employment.

The Project impacts raised are addressed in the assessments of social impacts of operational and environmental effects (Section 6.5). The social impact assessments in relation to these impacts are discussed and assessed in Section 7.

5.4 Te Rūnanga o Ngāti Waewae engagement

As mana whenua of Te Tai Poutini, the Papatipu Rūnanga, Te Rūnanga o Ngāti Waewae (Ngāti Waewae) has particular interest in preserving relevant cultural values on the plateaux and in Te Tai Poutini (West Coast) generally. Bathurst is in frequent contact with Ngāti Waewae in relation to matters arising from its operations. Ngāti Waewae has prepared the Cultural Impact Assessment (CIA) for the BPCP. The CIA requires engagement throughout the life of the BPCP, for example; *'Ngāti Waewae does not accept that impacts — however minor — should go unaddressed, and it is essential that ongoing dialogue between BRL and Te Rūnanga o Ngāti Waewae continues throughout all phases of the project'* (CIA 2026:5). Accordingly, it is considered as is incumbent on Bathurst to ensure on its part that this engagement is continued throughout the duration of the BPCP and subsequent related activities. The CIA is discussed further in Section 6.6.

5.5 Summary comments

5.5.1 Bathurst and the 'Social License to Operate'

The evidence gathered strongly indicates that Bathurst has a well-established and broadly accepted 'Social Licence to Operate (SLO)' in the district and region. SLO is described by Edwards and Trafford (2016) as having *'ongoing local community and stakeholder approval or social acceptance of the activities of a corporation'* and that *'such acceptability must be achieved on many levels, but it must begin with, and be firmly grounded in, the social acceptance of the resource development, by local communities'* (2016:2). The example of Ngakawau residents (Section 5.3.1) demonstrates that the existence of an SLO between a community and a business does not imply that there are no impacts



of the business's activity. The SLO is a product of a community assessing the positive and adverse impacts, and concluding that, on balance, the overall contribution of the business is positive, from which the existence of SLO can be identified. The evidence presented in the preceding sections is that this is the case regionally for Bathurst, and that it can continue to play its regionally significant role with a good level of community support.

There is recognition that some community members are opposed to mining generally, including existing operations at Stockton. The identified objections related to the environmental effects of mining. On this basis, a conclusion can be drawn that these people are likely to also be opposed to the extension of mining, as proposed for the Project. However, based on the primary evidence gathered and presented in the SIA, it appears that, on balance, the Project would be perceived by the broad community socially and economically beneficial to the BPCP Buller primary and secondary West Coast regional areas.

6 Impact assessment and prediction

6.1 Preliminary comment on the assessment of social impacts

In assessing the potential for social impacts of the Project, it is necessary to acknowledge the subjective nature of how such impacts may be experienced and/or perceived. For example, in discussing assessment of the significance of social impacts, the Technical Supplement supporting the NSW SIA guideline on which this SIA draws, observes that social impact aspects *'typically have both subjective and objective components, as this will depend on people's individual experiences and/or perceptions as well as technical evaluations'* (2023:12).

Stakeholder views may be informed by individual or collective perceptions and interpretations of how a development or certain aspects of it may be experienced by those stakeholders, or how it may affect them. For example, an effect that is of significant concern to an individual land occupant near a project site may be apparent to that occupant, but not necessarily to other stakeholders.

The extent of effects may also be affected by a range of factors, including relative proximity to the source of effects, or individual experiences with, or beliefs about, activities or projects that are the source of effects. This is the case with respect to the proposed Project. Stakeholders in the BPCP Buller primary, and West Coast secondary regional areas are more likely to experience direct and indirect effects of the Project, whereas more distant interested parties may hold perceptions on some effects but may not experience actual effects. It should also be acknowledged that, despite all reasonable efforts to avoid, mitigate, offset or compensate for effects, some stakeholders may retain their initial positive or negative attitudes or positions on the activities or Project.

6.2 Assumptions supporting impact assessment

Sections 4 and 5 describe the relationships between Bathurst and its workforce, and the local and regional communities and economies. This section describes in detail the assessed outcomes of continuing operations under the BPCP, using existing operations as a basis for the assessments.

As noted in Section 1.1, the alternative, or base case scenario against which the Project must be compared is the discontinuation of mining at Stockton Mine, as its CML and ACML expire by the end of March 2027. Separate consents would be required for mine closure activities, including decommissioning, and remediation and rehabilitation, which would follow after the end of mining.

In this scenario, all socioeconomic benefit from extractive mining on the plateaux would cease. There is also a possibility that some level of social contribution would also be lost, as individual workers and their households made decisions on future employment opportunities, which may entail relocation to other areas. Counterbalancing this outcome, the actual and notional costs of the Project, such as potential impacts on ecology of the plateaux, would be avoided.

6.2.1 Impact summary

Section 7 of the SIA (Table 25) provides an integrated summary of the positive and adverse impacts discussed in Sections 6.3 and 6.4. This includes the categorisation of impacts according to the structure presented in Table A (Section 2)⁷⁷ and identification of proposed impact mitigation. Table A1.1 (Annexure 1) also provides an assessment of the distribution of various impacts across BPCP Buller primary, and West Coast secondary regional areas and New Zealand, as the relevant study areas for the SIA.

6.3 Assessment of positive impacts

6.3.1 Relevant data and findings – Economic Impact Assessment (EIA)

One of the principles of social impact assessment is the use of relevant information and analysis from other assessments to support integration of social, economic and environmental considerations⁷⁸. As noted in Section 2.2, there is a close relationship between the social and economic (i.e. socioeconomic) effects of this and any similar project, as economic activity is one key measure of the wellbeing and behaviour of a community and its members. An example of such a relationship is included in Annexure 2 for reference, which includes an example of the interdependencies between social and economic impact assessments.

The following information summarises key project parameters and assessments of the Project economic effects that have important social impact implications. As described in Section 1.1, the 16-year production period on which the following assessments are based reflects the production schedule for the BPCP provided by Bathurst for preparation of the EIA. Notwithstanding the direction of Bathurst to maintain 2026 as the nominal commencement year, this 16-year period falls within the 20+ year timeframe for mining and construction operations, bearing in mind the potential for variation in production rates over the duration of the Project. Assuming this initial assumption of 2026 as the start point for assessment, the assessed 16-year BPCP duration reported is between 2026 and 2042.

⁷⁷ An alternative version of this structure source from the New Zealand Association of Impact Assessment (NZAIAO) is included in Annexure 1 for further reference.

⁷⁸ NSW DPHI 2023:10).



Because of the regional scale of Stockton Mine and the proposed BPCP, there are also indirect effects on the livelihoods of other workers and households in the BPCP Buller primary and West Coast secondary regional areas. This is due to the additional economic activity that the larger incomes of Bathurst workers provide.

As is discussed in other sections of the SIA, there is good evidence for the positive social impacts of work. From this perspective the positive impacts on livelihoods also support further direct and indirect positive impacts on the way of life of the workers and their communities, through supporting the activities through which they engage. These effects can also be interpreted as positively influencing the communities themselves, principally through their contribution to how the communities function in terms of economic sustainability.

6.3.4 Non-labour expenditure with regional suppliers

An additional measure of the influence that Bathurst has on the local, district and regional economies and communities is the number of suppliers that Bathurst's operations trade with, and the value of those transactions.

[REDACTED]

As a result of these successive rounds of transactions, additional employment is supported. As is the case for direct mining employment, the incomes from these jobs support workers' and their households' social and economic engagements with their communities. The proposed Project stands to extend these benefits over its duration.

These indirect or derived impacts are similar to those of the direct employment and incomes from employment with Bathurst. They directly, positively affect employers' and employees' livelihoods, which notionally leads to further positive effects on the way of life of these people, their households and the community more generally, and also contribute to the socioeconomic functionality of the communities.

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

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employment, noting the substantial majority of those that are located within the BPCP Buller primary regional area. It is acknowledged that workers and their households may ultimately need to make such decisions. However, the significantly greater amount of time afforded by the approval of the BPCP would provide greater opportunity to prepare for meeting these challenges, for both individual households, and as part of the ultimate, broader regional transition from mining as a major regional industry.

6.3.7.1 Delayed effects on school enrolments

The probable departure of workers and their households from the BPCP primary and secondary regional areas resulting from the end of mining is also likely impact on school enrolments in the primary BPCP Buller primary regional area in particular. Because school funding/resourcing generally relates to enrolments, declines in enrolments may cause funding reductions⁸³. Approval for the BPCP would contribute to forestalling such impacts, whereas the base case scenario of mining ending in March 2027 would possibly precipitate impacts at that earlier stage. In attempting to quantitatively assess the potential scale of these impacts, there are variables that notionally limit predictive accuracy. Examples are the decisions made by individual households, and ‘natural’ changes in enrolments over time as children enter, progress through, and leave school education.

6.3.7.2 Indicative assessment of possible delayed education impacts of mine closure

Bearing in mind the limitations noted above, a scenario approach has been taken to quantitatively assessing potential impacts. The fundamental approach is the application of relevant 2023 Bathurst workforce survey findings for school enrolments to the projected workforce for the Project. Enrolments included are for early childhood education (preschool), primary and secondary schools and polytechnic⁸⁴.

The 2023 Bathurst workforce survey determined that:

- 97% of workforce members lived within the BPCP West Coast secondary regional area. 96% of these lived within the BPCP Buller primary regional area.
- 40% of workers’ households residing within the BPCP West Coast secondary regional area had children enrolled in education. On average, each of these households had 1.9 children in education.
- 36% of workers’ households residing within the BPCP Buller primary regional area had children enrolled in education. On average, each of these households had 1.9 children in education.

⁸³ For example, the *Accounting for Schools* website states that; ‘The Ministry of Education provides various types of funding to help schools meet their financial needs, improve resources, and support students. Each funding stream has a specific purpose and is allocated based on different criteria, such as student numbers, school size, and specific educational requirements’.
<https://www.afsl.nz/a-guide-to-ministry-of-education-funding-a-handy-reminder-for-schools#:~:text=The%20Ministry%20of%20Education%20provides%20various%20types,numbers%2C%20school%20size%2C%20and%20specific%20educational%20requirements.>

⁸⁴ There was one person enrolled at Tai Poutini Polytechnic (Greymouth). There were also a number of students identified as attending various tertiary institutions, and primary and secondary schools outside WCRC.



Table 24 shows the application of these data to five scenarios⁸⁵ for arbitrarily determined proportions of worker households leaving the BPCP Buller primary and West Coast secondary regional areas at the end of mining. Due to the residential concentration of the workforce, Buller primary regional area schools, and particularly those in Westport, would be most affected. Table 24a provides an assessment of this projected impact. This is based on the survey counts of students attending Westport primary schools⁸⁶ and Buller High School, which was 161 students (88% of all BDC council area enrolments reported in the survey). An approximate combined number of students enrolled in these schools, based on recent data⁸⁷, was 950 students. As a result, it is concluded that workforce households accounted for around 17% of total enrolments in Westport primary and secondary schools. Potential student departure scenarios are based on this assumption. This is consistent with other key SIA and EIA assumptions based on continuity between the current operations and the Project.

As noted in the preceding sections, these scenarios are based on arbitrary assumptions regarding the extent of impacts. As a result, they are indicative, and do not represent assessments of actual projected impacts. As noted in Section 6.3.8, it is considered that approval of the BPCP would represent a positive outcome, as it would reduce the risk of the relatively imminent, simultaneous loss of a potentially material number of school students. Although mine closure will ultimately have an impact in this regard, the substantially longer project life of the BPCP would permit more time to prepare for that outcome, as part of the ultimate, broader transition from mining as a major industry in the Buller primary and West Coast secondary regional areas.

⁸⁵ 10%, 25%, 50%, 75% and 90%.

⁸⁶ St Canice's, Westport North School and Westport South School.

⁸⁷ BDC and school websites and information provided during stakeholder interviews (December 2023). It is noted that enrolments vary from year to year. Advice from all three primary principals was that there is relatively frequent transfer of students between the three schools.



Table 24: Indicative assessment scenarios departing Bathurst worker households, school enrolments

Table 24: Indicative assessment scenarios departing Bathurst worker households, school enrolments						
Total households leaving	WCRC worker households total	BDC worker households total	WCRC households with students	BDC households with students	Total WCRC students (households x 1.9)	Total BDC students (households x 1.9)
10%	39	38	16	14	30	24
25%	95	94	38	34	72	61
50%	190	188	76	68	144	122
75%	285	282	114	102	217	183
90%	342	339	137	122	260	219
100%	380	376	155	135	289	244

Table 24a: Indicative assessment of impacts on Westport primary and secondary schools

Table 24a: Indicative assessment of impacts on Westport primary and secondary schools			
% households leaving	Total BDC students (from Table 26)	Total Westport students⁸⁸ (88% of total BDC)	Total workforce students (17% of total Westport)
10%	24	21	4
25%	61	54	9
50%	122	107	18
75%	183	161	27
90%	219	193	33
100%	243	214	36

⁸⁸ Primary and secondary students, as per table title.



6.3.7.3 Delayed effects on other employment in worker households

As is the case for school enrolments, Bathurst workers' households also include other members who are employed and are considered as potentially capable of remaining so, should the BPCP be approved. It is likely that the probable departure of some households from WCRC/BDC on mine closure would also involve some proportion of these people vacating their jobs, some of which may not be easily replaced.

It is considered that approval of the Project would contribute to retaining some proportion of these workers, although the extent of this is subject to the circumstances of individual workers and their households. The base case scenario may result in the impacts of material numbers of departing workers occurring significantly earlier, given the March 2027 cessation of mining that current consents require.

These impacts may most directly affect the livelihoods of these workers and their households. Although it is reasonable to assume that people who relocate through necessity may find other employment, there are still probable disruptions and transaction cost effects imposed on these households, which may temporarily affect households' economic and social function. The potential loss of skilled workers may have further effects on community, as employers go through the process of filling vacated positions. This may also affect access to some services, although ideally, such impacts would be temporary.

6.3.7.4 Indicative assessment of possible delayed impacts of mine closure on other working household members

Indicative scenarios for the loss of other workers from WCRC and BDC was derived on similar bases as the approach used for school enrolments.

The 2023 Bathurst workforce survey determined that:

- 97% of workforce survey respondents lived within the BPCP West Coast secondary regional area. 96% lived within the BPCP Buller primary regional area.
- Around 45% of workers providing valid responses the households of included other people working full time. For part time employees, this was around 27%.
- In responding Bathurst workers' households, 96% of other people working were employed within the BPCP West Coast secondary regional area. Around 92% were employed within the BPCP Buller primary regional area.
- There were 0.6 full-time and 0.1 part-time other workers per responding household.

Table 25 shows the potential loss of workers from Bathurst workforce households for the various scenarios also applied to student impacts in Table 24 (i.e., ranging between 10% and 90%). Estimates for Westport are not included in Table 25. However, reportable survey responses indicated that around 69% of other workers were employed in the Westport area.

As is the case with the assessment of student losses, these scenarios are based on arbitrary assumptions regarding the extent of impacts. As a result, they are indicative, and do not represent assessments of actual projected impacts.

As noted in Section 6.3.8, approval of the BPCP would delay the necessity for possibly large-scale relocations of Bathurst workers' households. There are both 'micro' level impacts on individual workers and households and 'macro' level impacts on the BPCP Buller primary regional area community and economy generally, in particular, but also to a lesser extent for the West Coast secondary regional area community. The overall social benefit for BPCP Buller primary and West Coast secondary regional areas is that the approval of the BPCP will maintain the stability of current community structure and function. The approval would also facilitate planning for the ultimate transition from mining at the end of the Project (nominally 2042 for the assessments in this SIA). As noted, this is particularly pertinent to the BPCP Buller primary regional area community.



Table 25: Indicative assessment scenarios departing Bathurst worker households, other household workers

Table 25: Indicative assessment scenarios departing Bathurst worker households, other household workers								
% households leaving	Workers in WCRC	WCRC FT workers	WCRC PT workers	WCRC total workers	Workers in BDC	BDC FT workers	WCRC total workers	BDC total workers
10%	16	9	10	2	11	6	1	6
25%	41	23	25	4	29	14	2	16
50%	82	46	49	8	57	28	5	32
75%	123	69	74	12	86	42	7	49
90%	148	83	89	15	103	50	8	58
100%	164	93	99	16	115	56	9	65

6.3.8 Enhancement of positive impacts

The Project proposal fundamentally involves two alternative scenarios for the future of mining on the Buller Plateaux. As noted in Section 1.1, these are the base case, of mining operations continuing until the expiry of current approvals at the end of March 2027, or the approval of the Project, and continuation of mining through to 2042 as assumed for the assessments in this SIA, or for up to 20 years as identified in the AEE. In each case (base case or BPCP), a subsequent process of decommissioning and rehabilitation of up to five years would follow, which would be subject of separate consent approvals. Given the Project's longer duration, enhancement of positive project outcomes would be achieved through grant of consent, and the continuation of Bathurst's interactions with the BPCP Buller primary and West Coast secondary regional area communities and economies, including continuing its programs of community support.

6.4 Potential adverse impacts

6.4.1 Preliminary comment

As noted in the introduction to the impact prediction and assessment (Section 6.1), social impacts *'typically have both subjective and objective components, as this will depend on people's individual experiences and/or perceptions as well as technical evaluations'* (NSW DPHI, 2023:12). It is pertinent to reiterate these characteristics when considering some of the following impacts. This is because some of the impacts may not be tangibly experienced by affected parties. In such cases, impacts may be based on parties' perceptions, beliefs, or knowledge, for example. This distinguishes some of the following impacts from more tangible impacts, such as the physical effects of mining on the plateaux. Nevertheless, as observed by NSW DPHI, some parties may also be concerned by impacts on the plateaux, without physically visiting the plateaux and experiencing them.

6.4.2 Opposition to coal mining

Engagement with BPCP Buller primary and West Coast secondary regional area stakeholders acknowledged that some level of opposition to Bathurst's operations exists within the Buller District and West Coast Region, particularly regarding the environmental impacts of mining. However, the more common view expressed through primary research activity indicates that, on balance, substantial parts of the community are supportive of Bathurst's operations and would be highly likely to remain so in respect of the Project. This is important because Buller and West Coast are the primary and secondary regional areas for BPCP and are potentially most likely to be exposed to the actual or physical, adverse effects of mining. The evidence gathered and presented indicates a generalised view that the benefits of mining outweigh its costs at the BPCP primary and secondary regional area levels.

From a national perspective, there are organisations representing parts of the population that actively object to coal mining⁸⁹. With respect to the Project, presently there is also opposition to the FTAA legislation. This opposition has been expressed as protest activity at Bathurst sites on a number of occasions. Bathurst has engaged with relevant organisations (e.g. Environment Defence

⁸⁹ For example, World Wide Fund For Nature New Zealand (WWF-New Zealand) 2024: <<https://www.wwf.org.nz/news/climate-change/expanding-coal-mining-21st-century-absurd-selfish-decision> >; Forest and Bird 2024: < <https://www.forestandbird.org.nz/resources/open-letter-minister-bishop> >

Society, and West Coast Conservation Board (WCCB)/Forest and Bird⁹⁰). These engagements are reported in more detail in Annexure 6. It is noted that SIA Section 6.1 includes the statement that; *‘it should also be acknowledged that, despite all reasonable efforts to avoid, mitigate, offset or compensate for effects, some stakeholders may retain their initial positive or negative attitudes or positions on the activities or Project’*. The material reported in Annexure 6 shows this assessment is relevant in relation to the positions put forward by WCCB/Forest & Bird. It is assessed as unlikely that the interests of these groups can be reconciled with the Project.

Therefore, by association, it is concluded that this broader opposition would also apply to the Project specifically. There are various bases expressed for this opposition, including continued mining of fossil fuels for energy and industrial heat generation, and damage to the habitats of native fauna and flora.

It is noted that an indeterminate proportion of opposition to mining is likely to involve people who have never visited or may never visit the plateaux. It remains that despite this, these people may perceive impacts on themselves as a result of mining. Practically, these impacts are intangible but can be characterised as ‘non-use’ values. For example, this may refer to the value that may be ascribed to knowing that an environmental asset on the plateaux remains in existence (its ‘existence value’). From the perspective of categorising impacts, these effects can best be described as cultural impacts, as they relate to the beliefs of the affected parties. For people who are plateaux users, the impacts may also extend to their actual experience of the plateaux surroundings, with respect to impacts on environmental and aesthetic values and how they are able to access and use the plateaux, for example. These are assessed as tangible impacts.

6.4.2.1 Mitigating factors

Regarding opposition focused on the mining of fossil fuels, approximately 96% of coal produced through current and proposed mining under the Project involves extraction of metallurgical (coking) coal as an industrial mineral. This product is exported for use in steel production, noting that processing of the coal for this use also involves the generation of some emissions.

The remaining 4% of coal produced will be export thermal (steaming) coal used for energy production. Opposition to coal mining is most commonly focused on its contribution to energy generation and the resulting emissions. This does not apply to the substantial majority of BPCP product.

Bathurst publishes explanatory material on its management of the effects of its operations⁹¹. Bathurst acknowledges the environmental impacts of its operations and also publishes information

⁹⁰ The engagement with WCCB and Forest and Bird was conducted jointly in a face to face and online meeting, 19 March 2025.

⁹¹ For example, Bathurst Resources Limited website 2024, *Our Story*
< <https://Bathurst.co.nz/our-company/our-story/> >

describing its approaches to management and mitigation of these impacts⁹². The BRL website also invites stakeholder enquiries and provides local email contact details in relation to the Project.⁹³ These resources are continuously available to interested parties, to allow them to access and consider information on Bathurst's operations. This will also apply to operations under the proposed Project.

With respect to managing impacts, the Project proposal includes provision for continuous remediation/rehabilitation works throughout the mining program. These include works on addressing legacy impacts from mining that predates Bathurst's operations on the plateaux. The BPCP will also include a compensation and offset package to address residual impacts of the Project.

Notwithstanding Bathurst's mitigation activities, it must be acknowledged that, given the nature of these impacts, it is likely that opposition to mining will remain. Therefore, regardless of the merits of the Project, it is assessed as likely that it would remain subject of this broader opposition.

6.4.3 Construction stage workforce

During scoping and preliminary work on the SIA, the temporary presence of the additional construction workers required for the project was identified as a potential source of impacts, with particular regard to Westport and its surrounds, within the BPCP Buller primary regional area. This was anticipated as principally affecting community values, in terms of social impacts, as the temporary change in population composition may result in other impacts. Among these, potential effects on people's livelihoods and their way of life were considered as secondary or derived impacts. As is reported in Section 6.4.3.1, primary research was conducted to assess Buller primary regional area's capacity to absorb this change, as a fundamental element of assessing the potential for effects.

Table 25 includes the estimated construction workforce for the two construction periods included in the BPCP program. The labour requirement varies between a high of 168 workers in the first stage (2028) and a low of 43 workers (2032) in the second stage⁹⁴. The average across the construction program is 66 workers. The variation in the number of workers across different stages of the construction program is considered as adding an element of complexity to managing this Project impact.

6.4.3.1 Worker accommodation

Given the practicalities of travel to the mine for work and also Bathurst's obligations regarding workforce fatigue management, worker accommodation in Westport and its immediate surrounds is

⁹² For example, Bathurst Resources Limited website 2024, *Supporting our Environment* < <https://Bathurst.co.nz/our-commitment/supporting-our-environment/> >

⁹³ < <https://bathurst.co.nz/our-operations/buller-project/> >. The Project webpage states, *inter alia*, 'If you wish to register interest in the project to receive updates, or have any specific questions, please email westport@bathurst.co.nz with your details including your preferred method of communication, and we will be in touch'.

⁹⁴ Noting that no construction workforce is required in 2029 under the current program.

the preferred option for accommodating the additional workers required. As a result, any impact is likely to be mainly concentrated in this part of the BPCP Buller primary regional area.

Bathurst has conducted an audit of properties and temporary accommodation (such as motels) that are available in the Westport area (August 2025). The audit was focused on this area because of its proximity to the plateaux and the advantages this offers with respect to fatigue management and worker convenience, as noted above.

The assumed workforce structure for construction program assumes a peak workforce of around 168 people in its second year. For the remainder of the program, worker numbers are projected to range between 43 and 71 people.

The audit identified:

- 187 bedrooms in temporary accommodation (motels etc.), with 290 available beds.
- 22 properties leased by Bathurst, with 57 available bedrooms.
- Up to 35 rental properties available in Westport, with 79 available bedrooms⁹⁵.

As of August 2025, there may be up to 323 bedrooms available in the Westport area. 187 of these rooms are short term accommodation and therefore subject of competition from tourism and other visitation. Development West Coast [DWC] (2025)⁹⁶ data for WCRC council area reports the occupancy rate in commercial accommodation over the 13 months to June 2025 at an average of 38.5%. Buller District level data for this measure were not presented, however if this occupancy rate is indicative for BDC council area, it would indicate that on average, there may indicatively be around 115 available rooms. There are seasonal differences (e.g. occupancy averaged 60% from December 2024 through March 2025). However, the opportunity to secure regular higher occupancy during the construction stages would notionally be attractive to accommodation providers.

The average WCRC council area occupancy rate for short term rental accommodation over the same period was 49.5%. Applied to the audit data this implies around 18 available properties and 40 bedrooms indicatively available.

Combining commercial and short-term rental accommodation, an implied 155 rooms may be available in the Westport area. Noting the peak workforce of 168 workers, and the likelihood that some workers may already live in the BPCP Buller primary/West Coast secondary regional areas, the current situation indicates that there is capacity to manage the temporary workforce within existing stocks.

There is potential for effects on accommodation availability and costs during the construction period specifically. However, this cannot be estimated with any certainty because price effects would be in

⁹⁵ Search conducted through the 'Rentola' website. Alternative information from Realestate.co.nz was 11 properties with 24 available bedrooms. Some properties were listed on both sites.

⁹⁶ [West Coast Destination Insights | West Coast NZ](#)

response to the level of aggregate demand from all sources (e.g. temporary workers, tourism, other visitation), bearing in mind seasonality and potential provider preferences for the more regular occupancy from the workforce. It is considered that as there appears to be available capacity to manage the construction stage influx, accommodation costs would respond according to the combined market factors at any point.

With respect to the longer-term operational stages of the Project, because the BPCP represents a continuation of existing activities, the risk of impacts for other residents in the Westport area in particular is assessed as being relatively low. This is particularly emphasised by Bathurst's stated intention to retain much of its existing workforce as the basis for employment on the Project.

It is understood that although there has been some recent industrial development in the BDC council area and nearby other areas of the WCRC council area, these are not of significant scale, in terms of workforce sizes. This being the case, it is not expected that any material cumulative impacts would arise due to the coincidence of the BPCP construction stages and any other major project. It is noted, however, that there is always the potential for unforeseen circumstances, such as for a major natural disaster to occur, which may have some effects, although these cannot be determined with any certainty.

Workforce accommodation activity would also produce indirect economic benefits, which in terms of aggregate economic activity, may be interpreted as offsetting cost increases associated with accommodation, to some extent. Payments to rental providers and other worker consumption activity would directly and indirectly support other businesses and employment in the Westport area most specifically. It is highly likely that any ancillary or indirect employment would be occupied by local workers in the Westport area. This would extend the benefits of employment identified in other parts of the SIA to these workers and/or their households. Some worker households may move to the BPCP Buller primary or West Coast secondary regional area, which may have extended impacts on school enrolments, other employment, and community activity involvement for example. These impacts are considered as ostensibly being socially positive on the basis that they support worker and household contributions to social capital.

All of these impacts would be likely to be temporary, during the two constructions stages and would vary based on the variances in the numbers of workers engaged in each year of the construction program. Any of these impacts would effectively cease at the end of the construction program. It is noted that in the final two years of the construction program as currently proposed, the numbers of workers are 56 (nominally 2031) and 43 (nominally 2032). This would facilitate a gradual return to more typical social and commercial conditions.

6.4.3.2 Other impacts of temporary construction workforce

The influx of a relatively significant number of temporary residents will also increase demand for access to the range of services normally required by households. Examples include access to retail, medical and ancillary services, public infrastructure, and emergency services if and as required.

The general assumption is that services provided by the private sector (such as retail) will respond to additional demand, by increasing supply. This would be presumed to be the case for the existing supermarkets in Westport, for example.

Publicly funded services may have less capacity to respond to the increased demand. An example is Hato Hone St John. The presumption with such services is that these are available to all people, on the basis of need. Because of their younger age profiles, workforce households may create lower demand than the substantial proportion of older households that are typical in the BDC and WCRC council areas. Bathurst's focus on workplace health and safety should also generally substantially reduce the likelihood of incidents such as workplace injuries, which may also be beneficial in managing service demand.

It is also noted that Bathurst is already a significant contributor to maintaining health service access in the BPCP Buller primary regional area. Section 6.3.5 identifies Bathurst's contributions to key service providers (). In the BPCP primary and secondary regional area contexts, the recurrent contributions made by Bathurst are significant. The continuation of mining will permit these ongoing contributions over the life of the Project, to the benefit of the entire community, including resident and temporary Bathurst workers and their households.

With respect to other potential impacts, a search of New Zealand Police statistics for the Tasman Police District did not produce any evidence with respect to a relationship between temporary workers and increases in offence rates. It is noted that the Tasman Police District covers 70,000 km², and data is aggregated to that level. It is considered as unlikely that workers would create impacts of this nature. This is on the basis of the demands of their employment and related travel to and from the plateaux, and the prospect that when not on work rotation, some proportion of workers may return to their home district/region.

6.4.3.3 Summary of temporary workforce effects

The evidence gathered supports a conclusion that the BPCP Buller primary regional area, and Westport specifically, have the capacity to accommodate the temporary workforce. This may result in some adverse impacts, although these are assessed as unlikely to significantly affect community cohesion, function and character. Furthermore, there is also the prospect of some effects that may contribute positively to the community. As is the case with potential adverse impacts, it is concluded that these may also not be significant, in the context of the temporary nature of the underlying change.

In addition to the assessment that there is adequate accommodation capacity to manage the increase, it is also assessed as likely that the community and economy have the capacity to meet other increases in demand for goods and services. Based on this assessment, on balance, the effects are prospectively positive for the BPCP Buller primary regional area.

6.5 Social impacts of operational and environmental effects

The operational and environmental effects of the Project are addressed in the various specialist assessments included with the AEE. These include assessments in relation to:

- Traffic and transport.
- Recreation.
- Biodiversity/ecology.
- Water resources.
- Air quality.
- Noise.
- Visual impacts.

By definition, each of these assessed effects may involve impacts on particular stakeholders, or communities more broadly. Impacts may include effects on amenity, health and wellbeing, or accessibility, for example.

Each of the specialist reports has been reviewed from the perspective of the treatment of social impacts and have been found to satisfactorily address these aspects. The recommendations for addressing impacts are also included in each report. These are also considered appropriate in each instance, with respect to addressing positive and adverse social impact aspects. In the interests of avoiding repetition of the various report contents, only those aspects assessed as potential sources of social impact are addressed in the following sections. This approach is consistent with the material on methodology on content addressing Section 85(3) of the FTAA (refer to SIA Section 2).

6.5.1 Traffic and transport

Stantec New Zealand has separate Integrated Transport Assessment (ITA) reports for the Denniston Plateau and Stockton Mine elements of the Project. Stantec determined that the most likely source of Project traffic impacts is access to Denniston Plateau, via 'Denniston Track'. Traffic delays and the potential for crashes due to the potential for 'two-way vehicle conflicts' are the two most important forms of impact identified. Stantec also observed that these impacts are more likely to relate to the construction stage, given the greater frequency of heavy vehicle movements, when compared with the operational stage. Both stages are likely to involve greater frequency than is currently the case.

6.5.1.1 Traffic delays

Traffic delays are the impact of greater likely frequency. Social impacts of such delays can be categorised as affecting people's surroundings, in terms of their ability to access and use the relevant sections of public road.

6.5.1.2 Road crashes

Although the risk of serious crashes on Denniston Track is substantially reduced by the low-speed travel demanded by road conditions, the consequences of any serious crash are serious and relate to several social impact categories. Surroundings (vis-à-vis public safety) and health and wellbeing (vis-à-vis physical safety) are of the greatest significance.

Stantec states that *‘If drivers are not alert to the potential conflict, it could contribute to a higher risk of head-on type crashes or run-off road type crashes if drivers need to take evasive action or leave the road when manoeuvring. The injury consequence in the event of these types of crashes could range from minor to serious, particularly if a vehicle went off the road and down a steep drop’*(2025:33).

With respect to road crashes, the New Zealand Ministry of Transport (MOT, 2020) described the social costs of road crashes as follows: *‘Road crashes impose intangible, financial, and economic costs to society. These costs include:*

- *loss of life and reduced quality of life.*
- *reduced output due to temporary incapacitation.*
- *medical, legal, and vehicle damage costs*⁹⁷.

Content from the preceding *New Zealand Government Road Safety Strategy 2020-2030* also states that *‘this social cost is not just the cost on individuals, our health system and the disruption and delay on our road network. It reflects the permanent and profound devastation that deaths and serious injuries have on loved ones, families and whānau, colleagues and workplaces, and communities’* (2019:14).

MOT reported the social cost of road crashes in 2017⁹⁸ as:

- \$36 million in BDC.
- \$94 million in WCRC.

6.5.1.3 Mitigation of traffic impacts

Stantec’s recommendation for development of the Escarpment Extended Traffic Management Plan and the Project-wide Traffic Management Plan are aimed at reducing Project traffic impacts, generally but specifically with respect to likely delays and the potential for crashes. Stantec has also identified opportunities for infrastructure interventions (most particularly passing areas).

These recommendation are endorsed, as it is likely to reduce the risk to safety of users on the road network and contribute to maintaining road network function at levels acceptable to the community. The specific actions would collectively reduce the potential for social impacts for the community and the general public that use the road network, such as those identified by MOT and in the road safety strategy. Viewed from the perspective of current circumstances, notwithstanding the mitigation measures proposed, the mitigated effects are interpreted as resulting in an adverse impact for the public overall, and specifically for users of Denniston Track.

Further to these mitigation recommendations, the Denniston Plateau Access ITA in particular emphasises that the potential for impacts will be substantially greater during the Project

⁹⁷ <https://www.transport.govt.nz/statistics-and-insights/safety-annual-statistics/sheet/social-cost-of-road-crashes>

⁹⁸ Reported in 2017 prices.

construction stage. Because these effects will not extend over the life of the BPCP, the significance of these impacts is likely to be less over the majority of the Project life.

6.5.2 Recreation

The Recreation and Tourism Assessment (RTA) was prepared by Rob Greenaway and Associates (RGA, 2025). Regarding potential social impacts, RGA's findings include:

- *Escarpment Extended Project (ESE). This has the potential to alter recreation opportunities and values on the Denniston Plateau, primarily mountain biking, trail running and four-wheel driving, but also general recreational exploration of the Plateau for a wide range of interests, including scenic and natural history.*
- *The Upper Waimangaroa Haul Road (UWHR), which has the potential to affect mountain biking access and four wheel driving on, particularly, the Mackley Track between the Denniston Plateau and Lyell, and motor bike (including trial bike) access (including trial and trail bikes) and limited four-wheel drive access into the Mount Frederick area.*
- *The remaining areas have little potential for adverse effects on recreation.*

6.5.2.1 Social impacts of potential effects on recreation

Based on the intercept survey data, it is established that some users may variously experience or perceive positive or adverse impacts of the mining on the Plateaux, or a combination of these views. Given the survey method, it is not valid to directly extrapolate these findings onto a larger population. However, the data are instructive in demonstrating the differing perspectives on mining.

From the perspective social impacts, positive responses were most common (46%) and were focused on mining activity and the economic activity it supports; negative views related to general opposition to mining, and/or its environmental impacts (20%). The information presented in the SIA supports an interpretation that the positive views are consistent with the prevailing district and regional communities' positions on mining, whereas the negative views are more broadly consistent with interested parties who may not be familiar with the beneficial, localised effects of mining.

On the evidence reported regarding this sample, social impacts relating to the positive views can be categorised as chiefly relating to effects on livelihoods. As noted, these have particularly localised and regional implications. However, because only 12% of respondents were from the West Coast, this implies at least some positive, broader recognition of the economic importance of the mining industry.

The negative views are best characterised as affecting these respondents' interactions with surroundings. The relatively small proportion of West Coast respondents is also a consideration in respect of the magnitude of these impacts. Because the majority of respondents did not reside regionally, it is a reasonable conclusion that these would generally not regularly visit the region and experience practical impacts. This does not detract from the possibility of some intangible effects being experienced by these people.

The extent to which observations can be made on more frequent user groups such as those identified by RGA is limited due to consultation being incomplete. However, given the nature of the activities described by RGA (four-wheel driving, for example) and the specific impacts on the Mount Rochfort Stewardship Area, the most likely social values to be impacted are way of life and accessibility. The RTA conclusion is that these impacts will be severe over the course of the Project but may not be permanent.

There is also insufficient information available at present on the views of Te Rūnanga o Ngāti Waewae in respect of the Project, because consultation processes remain incomplete. There may be complex issues in respect of this stakeholder group, which may relate to their experiences of community, culture, health and wellbeing and decision-making systems. These potential impacts may need to be further investigated and addressed as consultation reaches an appropriate stage. This is discussed further in Section 6.5.1.

6.5.2.2 Mitigation of recreational impacts

The RTA's overall finding is that 'without mitigation, the Project has the potential for significant adverse effects on recreation' associated with the development of ESE and the UWHR. Impacted users and user groups may include participants in four-wheel drive, motorcycle (trail bike), mountain bike, trail running and walking activities, across several areas of the plateaux. The RTA recommends various mitigation activities, including:

- a formal consultation forum and other consultation;
- focused, managed access arrangements over the Project life;
- provision of educational material on plateaux use opportunities;
- progressive reinstatement of access opportunities on mine closure.

These recommendations are endorsed as part of the SIA. As noted in Section 6.4.5.1, the evidence from the RTA is that the most probable frequent users of the plateaux are most likely to be impacted in respect of their access to the ESE and UWHR. The recommendations on access during mining and reinstatement of access post-mining are expected to contribute to mitigating this impact.

Bathurst has also advised that direct consultation with user group representatives remained ongoing at the time that this report was submitted to Bathurst. For example, Bathurst has commenced engagement with four-wheel drive user groups for plateaux access on a limited number of days, with escorted transition through mining areas.

It is considered that this consultation process can be used as the basis for the ongoing, formalised consultation mechanisms recommended in the RTA. It is recommended that this approach be taken to the current engagement process. Current and ongoing consultation should remain focused on facilitating the management of impacts on all user groups and support development of longer-term structures for managing plateaux visitation and use.

With respect to the RTA mitigation recommendations, it is recommended that Bathurst assess the feasibility of each of these recommendations and pursue those that can be developed and

implemented. The aim is considered as being the facilitation of recreational use, without compromising user safety, and the security of the mine sites and operations.

6.5.3 Ecology/ biodiversity

Potential impacts on ecology and biodiversity, such as habitat disturbance and loss and the effects of this on native flora and fauna may be of concern to residents of BDC/WCRC and to people in other parts of New Zealand and elsewhere. It is noted that impacts on the environment were identified as a negative aspect of mining in the findings of the recreational use intercept survey discussed in Section 6.4.5.1.

A suite of reports on ecology/biodiversity factors has been prepared as part of the AEE⁹⁹. These have been individually reviewed from the perspective of their potential for contributing to social impacts. Each report includes mitigation recommendations for the specific effects addressed. The content of these various reports is not reproduced in the SIA, however a discussion of collective potential effects and mitigation approaches is presented below.

From the general perspective of potential social impacts, potential adverse impacts on terrestrial and other ecology are most appropriately categorised as effects on surroundings, that is, how people's ability to experience or interact with the environment may be affected by the Project. Additionally, there may be cultural impacts perceived or experienced by some parties, in respect of their relationships with the environment. Given the nature of the Project, some of these effects may be long term, or permanent, and thus may also have intergenerational impacts.

Adverse environmental effects may manifest as impacts on people's sense of place, their health and wellbeing as it relates to access to open space, and their surroundings. For users of the plateaux, these impacts can be interpreted as affecting their use values. Non-users of the plateaux who are aware of, or perceive effects, may experience impacts on their non-use values. For example, land disturbance may adversely affect people's perceived existence value in respect of the plateaux environment. As is noted in Section 6.4.2, Bathurst has engaged with relevant interest groups in relation to these impacts. The position of these groups is that notwithstanding proposed and ultimately

⁹⁹ These are:

- ecoLogical Solutions 2025: Buller Plateaux Continuation Project Terrestrial Ecological Impact Assessment Report. November 2025.
- GHD Limited 2025. Stockton Water Management and Impacts Assessment. December 2025.
- Lloyd's Ecological Consulting 2025. An Assessment of the Impacts of the Buller Plateaux Continuation Project on *Powelliphanta patrickensis* Snails and Proposed Effects Management. November 2025.
- National Institute of Water & Atmospheric Research Ltd (NIWA) 2025. Buller Plateau Continuation Project Assessment of Environmental Effects: Aquatic Ecology. July 2025.
- Rough Milne Mitchell (RMM) 2025. Landscape Assessment Report, Buller Plateaux Continuation Project. November 2025.

Te Rūnanga o Ngāti Waewae is one community group that may have specific interests in effects on the plateaux. In addition to the impacts identified above in respect of other stakeholders, Te Rūnanga o Ngāti Waewae may also experience effects on their culture, in particular. Te Rūnanga o Ngāti Waewae is discussed further in Section 6.6.1.

6.5.3.1 Mitigation of ecology/biodiversity impacts

As noted previously, each assessment includes mitigation recommendations for specific ecological/biodiversity. Collectively, these can be characterised as follows:

- Mine design and planning changes consequent to the assessments, intended to reduce the risk of impacts. This includes planned remediation/rehabilitation.
- Other physical mitigation features, such as proposed predator exclusion fencing.
- Impact management plans.
- Compensation and/or offset obligations.

Generally, these mitigation measures are subject of continuing development, with a view to these forming part of the conditions for an approval for the BPCP. As such, in their final form these measures are endorsed on the basis that they will also contribute to mitigating the social impact aspects of each of the primary ecology/biodiversity effects.

6.5.4 Preliminary comment on potential sources of health impacts

The following sections discuss operational effects that may have particularly detrimental impacts on the health of individuals. With respect to the impact categories presented in Table A of the SIA, these are principally characterised as health and wellbeing impacts. However, there may also be secondary impacts that would be captured in the surroundings category. These categories provide the framework for assessment of the following effects.

6.5.5 Air quality

Air pollution can be harmful to ‘human and animal health, and the environment’. The direct adverse impacts of human exposure to air pollution include ‘premature mortality, cardiovascular and respiratory disease, chronic and acute bronchitis, asthma attacks, restricted activity days, reduced lung function and reduced birth weights’¹⁰⁰. In addition to these potential impacts on directly affected individuals, there are indirect costs imposed on the broader community, in terms of the allocation of public and private medical and related resources to the treatment of such conditions.

In addition to assessing the potential for effects on people, the Air Quality Technical Assessment (AQTA, Tonkin and Taylor, 2025) also assesses potential ecological impacts, demonstrating that the Project’s possible effects on the surrounding environment relating to air quality have also been considered. As noted in Table A, any impacts may affect how people experience or are able to interact with their surroundings (i.e. their environment).

¹⁰⁰ NSW DPHI Technical Notes Supporting the Guideline for the Economic Assessment of Mining and Coal Seam Gas Proposals (2023:17).

The AQTA identifies that the inherent and mitigated risks of air quality impacts are low. On this basis, social impacts on the health and wellbeing of the community, and impacts on the surrounding environment, should be characterised as low. Despite this, there may be individuals who are personally more vulnerable to impacts, although the likelihood and extent of this possibility cannot be determined.

6.5.5.1 Mitigation – air quality impacts

It is important to note that the overall conclusion of the AQTA is subject to the implementation of mitigation approaches, which are addressed in the AQTA. This provision is supported from the perspective of managing the social impacts discussed above in relation to air quality.

6.5.6 Noise impacts

Marshall Day Acoustics prepared the Assessment of Noise Effects (ANE) for the Project. Potential effects relating to noise are categorised as potentially affecting the surroundings and the health and wellbeing of receivers who may be exposed to BPCP operations.

The report indicates that potential effects would be most likely to impact on the amenity of residential receivers. In this respect, the ANE concludes that *‘Overall, the Buller Plateaux Continuation Project is expected to have minimal noise effects on surrounding residential areas. The Ngakawau Rail Loadout presents the greatest potential for adverse noise effects; however, residents are already familiar with coal handling activities and the associated soundscape (2025:4)’*.

The findings of the report indicate that the potential for material impacts on nearby receivers is minimal. Accordingly, the potential for associated social impacts is also assessed as being minimal, noting the observed potential for impacts on some individuals noted in relation to air quality impacts, which are not readily assessed (Section 6.5.5).

6.5.6.1 Mitigation – noise impacts

Section 10 of the ANE recommends a suite of consent conditions, the adoption and implementation of which will contribute to impact mitigation. These are technical in nature and are therefore not reproduced here. However, adoption of the recommended conditions for the Project is supported, as it is considered as likely to effectively reduce the risk or magnitude of impacts.

6.5.7 Visual impacts

6.5.7.1 Visual impacts - lighting

Leading Design Professionals Limited prepared the Existing Infrastructure Lighting Effects (EILE) and the Proposed Infrastructure Lighting Effects (PILE) reports for the Project.

The overall conclusions of the EILE are that effects from lighting will be *‘negligible to low, or less than minor’* [2025(a):42]. This relates to existing sites at Stockton Mine and Ngakawau.

The EILE (and the PILE) specifically addresses the potential for amenity impacts (which are categorised as effects on the surroundings of relevant parties) and health effects, which directly relate to the health and wellbeing categories of social impacts.

Regarding potential health impacts, the EILE notes that *‘Excess light at night can negatively affect sleep. However, there will be minimal lighting visible from residential locations as described above, no permanent persistent flashing lights and the lighting complies with the BDP light spill provisions’* However, the report finding is that *‘the effects on health to residents will be negligible, or less than minor’* [2025(a):41].

A second group of people for whom impacts are assessed are motorists. In respect of these people, the EILE finding is that effects will be *‘negligible, or less than minor’* [2025(a):42].

The EILE findings indicate that no material social impacts are likely to result from the operation of existing lighting infrastructure for BPCP.

6.5.7.2 Mitigation – lighting impacts

Approaches for mitigating impacts are presented in Section 7 of the PILE. Briefly, these include operational measures, such as positioning and intensity of lighting, and direct mitigation measures for affected parties (such as funding blinds/curtains for affected residents). Adoption of these measures is recommended.

Based on these findings, and with the recommended mitigation measures implemented, it is concluded that there are unlikely to be material social impacts as a result of proposed infrastructure lighting.

6.5.7.3 Visual impacts - landscape

Landscape impacts associated with the Project are characterised as visual amenity impacts, and within the surroundings category of social impacts. It is noted that for some parties (specifically iwi), there is also the potential for cultural impacts, relating to undisturbed areas. Rough Milne Mitchell (RMM) has prepared a Project Landscape Assessment Report (LAR).

The LAR findings indicate that any material visual impacts would necessitate affected parties being relatively close to the Project areas. This is interpreted as limiting the extent to which social impacts may result in relation to the impacts of mining on the plateaux landscapes. Generally, the potential for impacts is limited. It is also noted that the LAR does not identify potential cultural impacts.

6.5.7.4 Mitigation – landscape impacts

The LAR concludes that mitigation of social impacts relating to landscape effects can be most effectively achieved through the proposed progressive remediation and rehabilitation, both during and post operations, and offset measures to be proposed as part of BPCP.

6.5.8 Archaeological and Historic Heritage

Social impacts relating to Project effects on heritage items are categorised as relating to:

- Surroundings (how people may experience or interact with their surroundings).
- community, to the extent that impacts on heritage items may affect community members' sense of place, for example.

Clough & Associates Ltd prepared the Archaeological and Historic Heritage Assessment (AHHA) for the Project. The AHHA expressly does not address Māori cultural values¹⁰¹. The report assesses potential impacts in each of the areas forming part of the BPCP. Heritage items located in the Project area generally relate to historic mining on the plateaux.

The AHHA includes a significant amount of technical detail, including in its recommendations and conclusions. It is noted that there are certain legislative and regional planning provisions active with respect to certain heritage items. Specific actions include the development of an Archaeological Management Plan or Archaeological Research Strategy; the protection of relevant items; recording of items; and the retrieval of artefacts for preservation.

To the extent that the preservation of heritage and/or archaeological items within the BPCP area may positively impact on interested stakeholders, the AHHA recommendations are endorsed for inclusion in Project planning and execution.

6.6 Te Rūnanga o Ngāti Waewae cultural values

As noted in Section 5.4, as mana whenua of Te Tai Poutini, Ngāti Waewae has particular interests in preserving relevant cultural values on the plateaux and in Te Tai Poutini generally. Ngāti Waewae has prepared the Cultural Impact Assessment (CIA) for the BPCP.

Ngāti Waewae states its priorities with respect to the BPCP as:

- Protecting the headwater streams that flow from maunga.
- Protecting the many small aquatic resources including streams, wetlands and springs.
- Rehabilitating degraded lands and waters.
- Negotiating an Accidental Discovery Protocol.
- Protecting the opportunity to enhance mahinga kai habitats.
- Protecting indigenous biodiversity, in particular taonga species (CIA 2026:5-6).

Bathurst is in frequent contact with Ngāti Waewae in relation to matters arising from its operations and in relation to the BPCP. With respect to this engagement, The CIA states that; *'Bathurst Resources Limited acknowledges and respects the responsibilities of Ngāti Waewae and the central role they hold as kaitiaki of Te Tai Poutini. In progressing the Buller Coal Project (BPCP), Bathurst Resources has expressed a clear commitment and genuine desire to engage meaningfully with Te Rūnanga o Ngāti Waewae, to understand and give proper weight to their cultural values and concerns, and to seek an outcome that is mutually acceptable. This collaborative approach reflects a*

¹⁰¹ AHHA Section 5 (2025:10).

recognition that the sustainable development of any project within the rohe of Ngāti Waewae must be pursued in a manner that honours and respects the tikanga, values, and interests of the iwi. Bathurst Resources views this relationship not as a compliance obligation, but as a meaningful partnership that is fundamental to the responsible and respectful progression of the BPCP' (BPCP CIA, 2026:8).

The CIA establishes the parameters for this engagement as follows; *'Ongoing dialogue with Bathurst and the regulators is important, as well as opportunities to provide input into key matters during the operational phase of the project. Where there are recommendations for management agreements, technical, or community-based working or advisory groups, Ngāti Waewae asks that they are also invited to be included in any such group. This provides an ongoing mechanism to ensure that cultural values can be presented and considered in future decision processes.'* (CIA 2026:17-18).

The CIA discusses various cultural considerations in respect of the BPCP. In each instance, the CIA identifies measures which Bathurst is taking (and which should be continued) and further measures for consideration. It is strongly recommended that Bathurst incorporate such of these further measures as are practical into BPCP planning, and consult with Ngāti Waewae on their adoption.

The CIA also includes a draft Accidental Discovery Protocol for the Project (CIA, Appendix 1). Adoption of this protocol is recommended.

Ultimately, Ngāti Waewae's conclusion is that; *'While the BPCP is complex, the history of mining and other disturbances in the wider area is also recognised, as are the efforts that Bathurst is proposing to minimise the effects and to provide various forms of compensation. From the perspective of Ngāti Waewae and considering the extensive compensation package proposed, project benefits, and any specific cultural matters, overall, these are likely to deliver a better outcome for Ngāti Waewae and Ngāi Tahu whānui, as well as for taonga species and the wider environment'* (CIA 2026:7).

6.7 Cumulative impacts

6.7.1 Introductory observations

The context for assessing cumulative impacts of the Project is that mining on the Plateaux will eventually be discontinued. Consistent with the definition of social impacts presented in Section 2, cumulative impacts may also vary, such as being positive or negative, for example. As such, some cumulative impacts, such as positive economic outcomes reported in the BPCP EIA, should be considered in the context of the additional Project duration, compared with the base case. Other effects, such as on community resilience, and ecological impacts can have longer term effects that will endure beyond the end of mining activity. In either case, effects will be additional to those that would result from the base case scenario of no approval, and mine closure in March 2027.

6.7.2 Views of Te Rūnanga o Ngāti Waewae

As is established in Sections 5.4 and 6.6, the views of Ngāti Waewae are important in understanding the potential for, and nature of cumulative impacts that may have implications for cultural values and therefore be of specific interest to this key stakeholder group. While noting changed 'social,

economic and environmental’ circumstances over time, Ngāti Waewae stated that *‘the cumulative impact of development on these values remains a matter of profound concern’* (2026:5). Such impacts may also be relevant to the broader communities, across the BPCP Buller primary and West Coast secondary regional areas.

As noted in Section 6.6, Ngāti Waewae, as Papatipu Rūnanga, identifies its ongoing role in providing relevant input across the duration of the Project. Ngāti Waewae acknowledges its well-established relationship with Bathurst, which forms the basis for the required ongoing inclusion of Ngāti Waewae’s views on the Project, as it proceeds. The CIA states that *‘Ngāti Waewae remains of the view that provided the proposed mitigation and compensation package is implemented as intended, the Project can be supported’* (2026:21).

6.7.3 Cumulative positive impacts

The Project would sustain the positive socioeconomic impacts established by Stockton Mine’s current operations in the BPCP Buller primary and West Coast secondary regional areas over the longer operating period that it entails. These cumulative impacts are effectively addressed in the comparison between the base case and the Project case. The community would benefit from the additional employment, commercial activities and their indirect effects and Bathurst’s continuing community support contributions, both financial and in-kind. There are relatively apparent, positive direct and indirect effects on peoples’ livelihoods in the BPCP Buller primary and West Coast secondary regional areas. Also, the continuing involvement of the workforce in their communities would contribute to building community cohesion and in some respects, such as emergency response capability and community resilience.

Some of the proposed mitigation measures proposed in the specialist technical reports in the AEE can also be interpreted as having positive cumulative impacts. For example, the consultation approaches suggested in the Project Recreation and Tourism Assessment may facilitate the management of impacts on user groups and support development of longer-term structures for managing plateaux visitation and use.

The means for ensuring that these benefits are enhanced is the approval of the Project. Sustaining the identified positive impacts would be one outcome of approval. Conversely, in the absence of the Project (that is, in the base case scenario of 2027 closure), cumulative positive and adverse effects that the Project would create would not eventuate.

6.7.4 Cumulative adverse impacts

As noted in Section 6.7.1, effects of the Project are additive to those of the base case scenario. Because the Project entails mining across a larger area of the plateaux, effects on cultural and environmental values and peoples’ ability to engage with those values are the most apparent source of cumulative adverse impacts. Some of these impacts will endure beyond the end of mining but will be mitigated to the extent practicable by well-planned and well-executed remediation/rehabilitation of the plateaux. The BPCP proposal also entails the negotiation of a compensation/offsets package. The specific intent of this package is to address the residual impacts

that the BPCP will leave. As this package will form part of an approval if granted, it is presumed that the package will address the public interest, and adequately reflect the scale of residual impacts, in the context of the benefits that the BPCP would produce.

Bathurst publishes information explaining its rehabilitation activities. As this material states, the companies' overall aim is *'To disturb as little area as possible for the shortest period of time'*.¹⁰² This approach therefore notionally reduces the time elapsed between rehabilitation and effective restoration of each site to a state approximating its pre-mining condition. This also reduces the duration and extent of cumulative impacts.

Other impacts assessed as potentially adverse are generally directly related to operations and therefore are assessed as of lower likelihood of creating enduring cumulative effects, as these would cease at the end of the Project.

Collectively, these impacts are most likely to affect peoples' experiences or perceptions in terms of their beliefs about the Project or mining more generally, and/or for plateaux users on their surroundings as they relate to the plateaux and how they are able to engage with those surroundings. The mitigation and compensation/offsetting initiatives may mitigate the cumulative effects, as may remediation across the plateaux, including areas in which legacy impacts are being remediated.

Section 6.4.3 discusses the potential effects of the inflow of construction workers during relevant stages of the Project. These effects are assessed as being temporary and therefore any cumulative impact would relate to the construction periods. It has been assessed as likely that there is capacity to manage these effects. It was also noted that there do not appear to be any other major projects in the BPCP primary or secondary regional areas that are likely to coincide with the BPCP construction stages. Assuming that this likely outcome eventuates, there are unlikely to be cumulative effects of an even larger, temporary workforce being present in the BPCP Buller primary regional area simultaneously.

6.7.5 Summary assessment- net cumulative impacts

The evidence gathered for and presented in this SIA indicates that the BPCP Buller primary and West Coast secondary regional area population largely views the effects of current mining on the plateaux as positive, despite the awareness of its adverse impacts. There are no apparent, external sources of cumulative impact that have been identified at this point, which would materially alter this situation, from the perspective of net cumulative impacts, as the descriptor of the relationship between assessed positive and adverse Project impacts.

It is concluded that the balance of positive and adverse cumulative impacts of the Project itself are similar to those of existing operations, but over the longer proposed duration of operations proposed in the BPCP. The various positive socioeconomic impacts are assessed as being of greater

¹⁰² < <https://Bathurst.co.nz/our-commitment/supporting-our-environment/rehabilitation/> >

magnitude than the adverse impacts, such as those associated with additional land disturbance. Therefore, on balance, it is concluded that the net effects of cumulative impacts of the Project itself will be positive.

At national level, cumulative impacts are also considered as likely to be positive. This is because the BPCP will maintain export activity over the longer period, which is interpreted as a socially favourable outcome for New Zealand, as the tax, royalties and other fees and charges paid to government support the provision of services to the public. In the absence of consent, this flow of benefits will cease.

7 Social impact risk assessment

Table 26 summarises the social impact risks identified in Section 6. The table includes sources of risk and the proposed avoidance, management and mitigation measures for addressing these risks. Table A1.1 in Annexure 1 presents an assessment of the distribution of impacts across the local, regional and national social locations of the Project.

The assessments from Tables 26 and A1.1 are integrated into the social risk assessment table, Table 27. Table 27 includes comparative assessments for both the base case (no approval) and the Project. The table also ascribes a positive, negative or neutral assessment to each impact, as between the two alternative cases. Figures 21 and 22 present the explanatory material on the assessments of likelihood and magnitude for each Project impact, to facilitate interpretation of the findings presented in Table 27.



Table 26: Impact assessment and prediction

Table 26: Impact assessment and prediction – summary			
Identified source of impact	Impact categories affected	Proposed mitigation	Discussion of matters considered in assessment of social impact
Ecological and physical impacts of mining on plateaux (e.g. flora & fauna, land & water, and heritage).	Way of life; Culture; Health & wellbeing; Environment	Progressive rehabilitation/remediation during mining.	The Project entails continuation of the existing activity on the plateaux. Additional land area will be disturbed for mining. The impacts of mining in these areas will be similar to those on existing operational areas but distributed across the various areas included in the BPCP. Operational impacts are likely to be consistent with those of current operations and therefore are generally assessed as unlikely to cause material adverse impacts .
Operational impacts of mining on BPCP sites (e.g. noise, visual amenity, etc).		Post-mining decommissioning, rehabilitation/remediation prior to relinquishment.	
		Remediation of historic/legacy mining impacts (e.g. AMD)	The Bathurst Resources Limited 2024 Annual Report summarises Bathurst’s approach as: <i>‘The early identification and assessment of sustainability matters alerts us to potential risks and opportunities and enables the planning of mitigation and optimisation strategies. These assessments may result in amendments to a project or avoidance of an area if the risk of proceeding is found to be too high’</i> (2024:42) ¹⁰³ .
		Compensation/offset obligations	
		Approval conditions structured to address specific impacts (e.g. consent conditions)	Project planning includes progressive rehabilitation and remediation throughout the extended life of the Project. There will also be a post mining decommissioning and rehabilitation/remediation period of up to five years during which these works would be completed, which would be subject of separate FTAA application/s. It is also noted that Bathurst also has obligations with respect to remediation of certain historic/legacy impacts at Stockton Mine, such as management of acid mine drainage (AMD). An appropriate compensation/offset package is also being formulated with respect to residual/long term impacts.
		Ongoing engagement with relevant stakeholders, agencies and communities.	
			The BPCP proposal also entails the negotiation of a compensation/offsets package. The specific intent of this package is to address the residual impacts that the BPCP will leave. As this package will form part of an approval if granted, it is presumed

¹⁰³ <https://bathurst.co.nz/investors-news/financial-reports/>



Ecological & operational impacts (continued)	that the package will address the public interest, and adequately reflect the scale of residual impacts, in the context of the benefits that the BPCP would produce. Technical reports provide recommendations for mitigation of the relevant impacts, which should be appropriately implemented.
Surroundings; Decision making systems; Bathurst to continue making information publicly available and consider approaches for public engagement in relation to the use of coal produced by the Project. Emphasise the status of coking coal as a national government recognised critical mineral.	Perceptions on other environmental effects of coal mining, particularly in relation to contribution to climate change etc., noting that the Project will produce mainly metallurgical (coking) coal, not thermal (steaming) coal. As stated in various sections of the SIA, there is apparent regional support for current operations, which is considered as likely to continue. There is also a level of general opposition to mining in New Zealand more generally, which should to some extent be mitigated by the use of coal produced by the Project. This includes opposition to the FTAA legislation, as it relates to coal mining. Bathurst publishes explanatory material on its management of the effects of its operations¹⁰⁴. Bathurst acknowledges the environmental impacts of its operations and also publishes information describing its approaches to management and mitigation of these impacts¹⁰⁵. These resources are continuously available to interested parties, to allow them to access and consider information on Bathurst's operations. This will also apply to operations under the proposed Project.

¹⁰⁴ For example, Bathurst Resources Limited website 2024, *Our Story*

< <https://Bathurst.co.nz/our-company/our-story/> >

¹⁰⁵ For example, Bathurst Resources Limited website 2024, *Supporting our Environment*

< <https://Bathurst.co.nz/our-commitment/supporting-our-environment/> >



Table 26: Impact assessment and prediction – summary

Identified source of impact	Identified source of impact	Identified source of impact	Identified source of impact
Employment effects (direct and indirect)	Way of life; Community; Health & wellbeing; Livelihoods	Beneficial impacts of local/regional employment will result if the Project is approved.	Direct employment with Bathurst will support social and economic interactions of workers and their households. This will indirectly support other employment in the region and district, with similar household social and economic onflows. Indirect employment (with contractors, suppliers, service providers etc.) has similar onflows, some with broader distributions (e.g. transport and logistics service providers). These forms of positive impact will be maintained over the extended life of the BPCP. The effects would be significantly greater than would those of the base case, 2027 mine closure. The magnitude of this difference is clearly related to the significant difference in duration of the two mining scenarios.
Short term local and regional social and economic effects of construction workforce	Way of life; Community; Health & wellbeing; Livelihoods	Beneficial impacts of local/regional employment during the construction stages will result if the Project is approved. Bathurst to monitor adequacy of local accommodation capacity, particularly during peak construction workforce stage. Maintain engagement with BDC and other local community stakeholders to monitor any effects.	An accommodation audit for the Westport area(Bathurst) and DWC accommodation occupancy data indicate that there is likely to be sufficient capacity to accommodate the influx of temporary construction stage workers. Any effect may also be reduced by the possibility that some workers may already live in the BDC area. There may be some impacts on commercial and/or short-term rental property prices, as the market responds to any increase in occupancy. This would be beneficial to accommodation providers but may reduce available rooms for other clients. This reduction may be offset by the regular occupancy offered by workers. The additional people living in the area will also increase demand for other services, however it is likely that service providers will respond positively to meeting the additional demand, with an overall positive result in terms of local business activity and employment. As noted, these impacts will be temporary, during construction activity. Once that activity ceases, all impacts are also likely to largely cease.



Table 26: Impact assessment and prediction – summary

Identified source of impact	Identified source of impact	Identified source of impact	Identified source of impact
Commercial activity (direct and indirect)	Way of life; Livelihoods	Beneficial impacts of commercial activity will result if the Project is approved.	Commercial activity between Bathurst and its supply chains supports positive social and economic onflows for business operators, their employees, their households and the study area economies more generally.
Bathurst community support contributions (cash and in-kind)	Community; Health and wellbeing;	Contributions will continue over the life of the Project, if approved.	Recurrent (annual) contributions to key regional organisations (e.g. Buller Health Trust, Buller Resilience Trust and various schools). Bathurst continues to hold a regional 'Social Licence to Operate (SLO)'. Assuming continuation of community support activity, it is likely that this SLO can be maintained.
Buller Plateaux recreational users	Way of life; Community; Accessibility; Surroundings	Access arrangements for relevant user groups under negotiation. Progressive rehabilitation/remediation during mining. Post-mining decommissioning, rehabilitation/remediation prior to relinquishment. Ongoing engagement with relevant stakeholders, agencies and communities.	It is proposed that access to relevant areas of the plateaux for some user groups (e.g. 4WD clubs) would be subject of conditions including limitations on available days of access, and escorted transit through mining areas during BPCP operational stages. Some passive user groups may experience adverse impacts, and some may experience positive impacts. It is likely that mining will permanently adversely affect some recreational use opportunities. However, BPCP rehabilitation and remediation planning, and compensation arrangements, include some proposed actions that may protect habitat (e.g. through exotic weed and pest management that may protect native habitat and species).
Cultural values effects	Way of life; Culture; Community; Health and wellbeing	Ongoing, structured and other engagement with Te Rūnanga o Ngāti Waewae and engagement with other relevant stakeholders, agencies and communities.	The CIA reports that; <i>'From the perspective of Ngāti Waewae and considering the extensive compensation package proposed, project benefits, and any specific cultural matters, overall, these are likely to deliver a better outcome for Ngāti Waewae and Ngāi Tahu whānui, as well as for taonga species and the wider environment (2026:7); and 'Ngāti Waewae remains of the view that provided the proposed mitigation and compensation package is implemented as intended, the Project can be supported' (2026:21).</i>



Table 26: Impact assessment and prediction – summary

Identified source of impact	Identified source of impact	Identified source of impact	Identified source of impact
Traffic and transport	Surroundings; Health and wellbeing	Development and implementation of Escarpment Extended Traffic Management Plan (TMP). Recommendations regarding physical infrastructure (e.g. passing areas).	The greatest sources of potential social impact are identified as traffic delays and road crash risks on Denniston Track. These are more likely to be material during the construction stage. The Denniston Traffic Assessment recommends development of an Escarpment Extended TMP, as part of a broader Project-wide TMP to address impacts and their mitigation. The indicated road improvements on Denniston Track would also contribute to impact mitigation.
Employee contributions to community organisations, activities etc.	Way of life; Community	Employees' social contributions are assumed as likely to continue over the life of the Project, if approved.	The Project will extend employment of the workforce through to the expiry of any extended consents. This will allow workforce members to remain living in the district/region and contribute to the range of community organisations and activities with which they are involved.
Regional/district emergency operations contributions	Way of life; Community; Surroundings		Bathurst has become an integral part of the district/regional response capability in emergency situations (e.g. natural disasters), through provision of personnel and equipment. BPCP extension of operations will preserve this capability. This may also alleviate demand on other public resources in such circumstances.
Long term plateaux impacts (e.g., post-mining landforms and use).	Culture; Community; Surroundings	Progressive rehabilitation/remediation during mining. Post-mining decommissioning, rehabilitation/remediation prior to relinquishment. Remediation of historic/legacy mining impacts (e.g. AMD) Compensation/offset obligations	The Project will result in the disturbance of additional areas of the plateaux. Ever, the BPCP is predicated on a 'greatest extent' basis. Bathurst will continue to refine the Project over its duration, to seek to minimise impacts. How These areas will be progressively rehabilitated throughout the life of mine (LOM). Some proposed compensatory measures (e.g. predator exclusion fencing) may improve some ecology/biodiversity outcomes. The evidence gathered and presented suggests that mining impacts are widely accepted within the region, as they support the socioeconomic benefits of mining. Although there is reported tourism visitation from other areas, the most frequent recreational users of the plateaux are from within the Buller District and West Coast region. It is possible that some frequent users may experience the effects on the plateaux as 'neutral', once unimpeded access is restored.



Long term plateaux impacts (continued)			There is some opposition to mining within the regional communities, and at national level. The nature of this opposition, including an element of non-use values, indicates that the Project will create adverse social impacts. It is assessed as likely that this would remain the case, despite the interventions noted above, which may result in positive outcomes to some extent. The BPCP proposal also entails the negotiation of a compensation/offsets package. The specific intent of this package is to address the residual impacts that the BPCP will leave. As this package will form part of an approval if granted, it is presumed that the package will address the public interest, and adequately reflect the scale of residual impacts, in the context of the benefits that the BPCP would produce.
Cumulative impacts	Way of life; Community; Surroundings	Progressive rehabilitation/remediation during mining. Post-mining decommissioning, rehabilitation/remediation prior to relinquishment. Remediation of historic/legacy mining impacts (e.g. AMD) Compensation/offset obligations Approval conditions structured to address specific impacts (e.g. consent conditions) Ongoing engagement with relevant stakeholders, agencies and communities.	The cumulative impacts of most elements of the Project are assessed as being applicable mainly during the Project (for example the positive socioeconomic benefits of employment). There are some positive impacts (for example, continuing development of community cohesion and resilience) and residual adverse impacts (such as ecological and physical effects) that may endure beyond Project duration. With respect to cumulative physical impacts on the sites, The BPCP is proposed on a ‘greatest extent’ basis. That is; <i>the maximum disturbance footprint for the BPCP. Bathurst has and will continue to refine the footprint of the key mine components during detailed design and exploration to reduce environmental impacts to the extent practicable and improve the efficiency and effectiveness of the mining operations’</i> (BPCP Project Description 2026). Furthermore, Bathurst’s aim to ‘To disturb as little area as possible for the shortest period of time’ should serve to reduce the time over which these cumulative impacts remain. Based on the balance between positive and adverse effects, and their varying levels of duration and materiality in the context of a continuation of existing activities, effects are assessed as neutral.



Table 27: Social risk assessment – Buller Plateaux Continuation Project

Table 27: Social risk assessment – Buller Plateaux Continuation Project			
Project activity/outcome	Without BPCP Project	With BPCP Project	Positive or adverse
Ecological, physical and operational impacts of mining on plateaux sites	A3	A3	
Other perceived impacts, including general opposition to mining	C2	C2	
Employment effects (direct and indirect)	C2	A4	
Short term local and regional social and economic effects of construction workforce	D1	A3	
Commercial activity (direct and indirect)	C2	A4	
Recreational use impacts	B2	B4	
Cultural values effects (BPCP assessed as positive)	D3	B3	
Traffic impacts – road crash risk (construction stage)	D4	C4	
Traffic impacts – traffic delays (construction stage)	C1	B2	
Bathurst community support contributions (cash and in-kind)	D2	A3	
Employee contributions to community organisations, activities etc.	C3	A3	
Regional/district emergency operations contributions	C2	A4	
Long term plateaux impacts (e.g., post-mining landforms and use).	A3	A3	
Cumulative impacts (total Project effects)	A2	A4	
		Positive effect	
		Adverse effect	

Figure 21: Structure for assessment of impacts¹⁰⁶

Table 3 Defining likelihood levels of social impacts

Likelihood level	Meaning
Almost certain	Definite or almost definitely expected (e.g. has happened on similar projects)
Likely	High probability
Possible	Medium probability
Unlikely	Low probability
Very unlikely	Improbable or remote probability

Table 4 Dimensions of social impact magnitude

Dimensions		Details needed to enable assessment
Magnitude	Extent	Who specifically is expected to be affected (directly, indirectly, and/or cumulatively), including any vulnerable people? Which location(s) and people are affected? (e.g. near neighbours, local, regional, future generations).
	Duration	When is the social impact expected to occur? Will it be time-limited (e.g. over particular project phases) or permanent?
	Severity or scale	What is the likely scale or degree of change? (e.g. mild, moderate, severe)
	Intensity or Importance	How sensitive/vulnerable (or how adaptable/resilient) are affected people to the impact, or (for positive impacts) how important is it to them? This might depend on the value they attach to the matter; whether it is rare/unique or replaceable; the extent to which it is tied to their identity; and their capacity to cope with or adapt to change.
	Level of concern/Interest	How concerned/interested are people? Sometimes, concerns may be disproportionate to findings from technical assessments of likelihood, duration and/or intensity.

¹⁰⁶ Figures 21 and 22 source: NSW Department of Planning, Housing & Infrastructure 2023.< <https://www.planning.nsw.gov.au/policy-and-legislation/under-review-and-new-policy-and-legislation/social-impact-assessment> >

Figure 22: Social impact significance matrix

Table 6 Social impact significance matrix

		Magnitude level				
		1	2	3	4	5
Likelihood level		Minimal	Minor	Moderate	Major	Transformational
A	Almost certain	Low	Medium	High	Very High	Very High
B	Likely	Low	Medium	High	High	Very High
C	Possible	Low	Medium	Medium	High	High
D	Unlikely	Low	Low	Medium	Medium	High
E	Very unlikely	Low	Low	Low	Medium	Medium



8 Conclusions and recommendations

8.1 Conclusions

The report assesses the social impacts of the Project at BPCP Buller primary and secondary regional area levels, and also at the national level for relevant impacts. The assessments have been prepared on the basis of a comparison between a baseline case in which the Project is not approved, thus limiting social contribution to the expiry of current consents, and the approval of the Project, which will extend those contributions over the duration of the Project. As the Project essentially involves the continuation of current activity (albeit over a larger land area), it follows that many of the physical impacts on the plateaux will manifest as an extension of existing conditions. Similarly, given that the size of the mining workforce is planned to be essentially similar to that for current Stockton operations, these impacts will also effectively be a continuation of current circumstances.

It is apparent from the analyses that the most material social effects are concentrated in the BPCP Buller primary and West Coast secondary regional areas, when compared with those assessed as being of interest to parts of the New Zealand population. This is to be expected given the relative size and isolation of the primary and secondary regional areas, and the constraints on opportunities for socioeconomic diversification that these involve.

At the Buller primary and West Coast secondary regional area levels, there is substantial evidence to support a conclusion that the Project will be acceptable to these communities, as is the case for existing operations. Importantly, this is also assessed to be the case for the Westport area, as the nearest centre to the Project sites. The report finds that Bathurst has a well-established 'Social Licence to Operate (SLO)' across these areas. The evidence gathered indicates that the Buller primary regional area and Westport area communities in particular recognise that mining does involve adverse impacts but appears to accept that the beneficial impacts to the region, and district and localised levels outweigh the adverse impacts.

Bathurst's SLO is evidently strongly based on its socioeconomic benefits for the Westport, BPCP Buller primary and West Coast secondary regional areas. Bathurst conducts a range of commercial engagements in the Westport, BPCP primary and secondary regional areas that support and stimulate further business and employment. Bathurst also makes substantial contributions to important agencies and organisations in Westport and across the BPCP Buller primary and West Coast secondary regional areas. Stakeholder comment indicates that some of these contributions, such as emergency response capability, have become critical to the community and to community resilience, in Westport and the Buller primary regional area in particular, and that there is no apparent substitute for these contributions. It is also important to note that, accepting a level of inherent variability for these contributions, they are recurrent. Therefore, the Westport, and BPCP primary and regional area communities will benefit over the extended duration of the Project. In the base case scenario, these benefits will decrease and eventually cease, as mining operations cease at the end of March 2027, and post mining activities are conducted and completed, subject to the relevant consents being obtained.



Historic and present mining on the plateaux have clearly changed the character of the mined areas. Notwithstanding previous and continuing remediation and rehabilitation, it is likely that these effects will be perceived as negative by some parties. Within Westport and the BPCP Buller primary and West Coast secondary regional area communities, this land use appears to be a widely accepted consequence of mining. The evidence indicates that the socioeconomically beneficial outcomes of mining are considered as being of greater magnitude than these adverse impacts. It is considered as likely that Bathurst's ongoing management of site impacts is also a factor in the acceptance of the balance between the adverse impacts and benefits of mining.

The AEE also includes specialist reports on various operational impacts, such as noise and visual amenity effects. These effects are largely relevant to limited numbers of residents and other people who may be in the near vicinity of the Project mine sites and infrastructure less frequently. The specialist assessments generally conclude that these effects are largely consistent with those of existing operations and are unlikely to materially affect the relevant stakeholders.

It is acknowledged that there is some opposition to coal mining within local, regional and national communities. Much of this is particularly based on the use of thermal (steaming) coal for energy and industrial heat generation, and its role in creating greenhouse gas emissions, particularly when compared with renewable energy sources.

It is important to emphasise that the substantial majority of BPCP coal product (around 96%) is metallurgical (coking) coal, used in steel production. Although these processes also create emissions, there is no feasible alternative to current production processes at scale, and global demand for steel will continue to increase. The inclusion of coking coal in the MBIE *Critical Minerals List for New Zealand* also demonstrates the importance of this product to the New Zealand economy. It is advisable that Bathurst makes this distinction when dealing with stakeholders. This may encourage more informed views on the BPCP.

8.2 Benefit statement

From the perspective of its social impacts, the most affected stakeholders in relation to the BPCP are those in the Buller primary and West Coast secondary regional area communities. This particularly applies to the communities in Westport and its surrounding settlements. Mining is a long established and integral part of the social and economic structure and function in the BDC and WCRC council areas. Based on the evidence presented in this report, it is concluded that the direct and indirect social impacts of the BPCP will be significantly beneficial for these communities, on balance.

From the national perspective, the continuing mining and supply of coking coal as a critical mineral of national significance is an important factor in demonstrating the Project's assessed beneficial contribution to New Zealand. This produces taxes and other incomes that support the provision of socially beneficial services to the New Zealand public.



Overall, it is concluded that the Buller Plateaux Continuation Project will result in significant social benefit. This benefit will be particularly concentrated in Westport and the BPCP Buller primary regional area (i.e. the Buller District), with substantial benefits also for the BPCP West Coast secondary regional area (i.e. the West Coast Region).

8.3 Recommendations

8.3.1 Direct recommendations of the SIA

8.3.1.1 *Community support*

As noted in Section 8.1, the status of Bathurst's SLO is substantially supported by its socioeconomic contributions in the Westport, BPCP Buller primary and West Coast secondary regional areas. In order to maintain the SLO, Bathurst should commit to continuing its community support activities in their various forms.

8.3.1.2 *Communication with communities within the region*

Bathurst should also continue to actively communicate with the Westport, BPCP Buller primary and the West Coast secondary regional area communities, to ensure that their support is maintained over the duration of the Project. This is consistent with current practice with respect to Stockton Mine operations. It is also likely to become important towards the end of extended operations, assuming approval. Access to established channels of communication will facilitate Bathurst working collaboratively with BDC and WCRC council area stakeholders to ensure outcomes that are consistent with a 'just transition',¹⁰⁷ at the appropriate stage.

8.3.1.3 *Communication with other stakeholders*

Project development has created opportunities for engagement with stakeholders with whom Bathurst may not have formally engaged prior to the Project. The communication channels established during Project development should be actively maintained. This would facilitate in circumstances respect to matters of specific interest to certain stakeholders that may arise during the Project.

8.3.1.4 *Project advocacy*

Some of the information gathered and presented in the SIA indicates that the purpose of mining on the plateaux, and the use of the product coal, may not be well understood. The Project necessarily involves engagement with various stakeholders and interested parties at the national and international levels. These engagements should be used as opportunities for advocating for the mining of metallurgical coal, and its beneficial contribution to social and economic sustainability at regional and national levels.

¹⁰⁷ The concept of a 'just transition' is commonly referenced in relation to the transition to a low emissions economy (e.g. MBIE, 2024: < <https://www.mbie.govt.nz/business-and-employment/economic-development/just-transition> >). The concept is equally applicable to the necessary, eventual socioeconomic transition of the BDC/WCRC areas at the end of mining.



8.3.1.5 Community monitoring

The communications channels established should also be used as a means for monitoring community sentiment on the Project as it proceeds. Mechanisms such as the electronic distribution of information/updates on the Project, brief surveys on community views, and in-person information sessions may be used. Because Bathurst employees are embedded in the Westport community in particular, there will also be opportunities for informal information gathering from other community members. A register could be established to gather this information. The information could then be used to address any issues that are material.

8.3.1.6 Workforce accommodation management

Section 6.4.3 addresses the potential impacts of the influx of construction stage workers to the BPCP Buller primary regional area and the Westport area in particular, during the relevant stages of the Project. With respect to potential impacts on the local housing market in Westport and its surrounding settlements, the research conducted by Bathurst (August 2025) indicates that there may be adequate capacity to manage accommodating the temporary workforce, noting that market conditions may vary over the duration of the construction program. It is recommended that Bathurst monitor this situation and engage with services providers to maximise opportunities for managing accommodation needs.

It is considered that the likely increase in demand for other services that the temporary presence of workers would produce would result in service providers either expanding capacity, or managing any increase through existing capability, including deploying any spare capacity. The overall effects of these impacts are considered as most likely to be positive, as they will notionally support increased business and employment as services are provided to these additional people. It is therefore considered that these effects may be monitored but should not require any specific actions with respect to management or enhancement of effects.

8.3.2 Relevant recommendations from AEE technical reports

Section 6.5 of the SIA provides a summary of the impacts and mitigation proposals identified in other technical reports included in the AEE that are assessed as potentially having social impact implications. It is a recommendation of the SIA that the identified mitigation proposals be adopted where practical. Furthermore, it is recommended that monitoring be included as part of the mitigation proposals, to ensure that the risk of social impacts is managed over the life of the Project.



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Annexure 1: Impact identification and assessment

Table A1.1 Distribution of impacts across study areas

Table A1.1: Assessment of impact distribution							
LEGEND	POSITIVE EFFECT	✓	ADVERSE EFFECT	✘	NEUTRAL EFFECT	∅	
Assessment matter	Description of impact and proposed avoidance, management and mitigation responses			Social impacts potentially indicated	BDC effect	WCRC effect	National effect
Ecological, physical and operational impacts of mining on plateaux sites	The Project entails continuation activity on the plateaux, consistent with current activity, however, additional land area will be mined, and therefore, altered. The impacts of mining in these areas will be similar to existing operations, which the evidence indicates are largely accepted within the region, in the context of the offsetting socioeconomic benefits that Bathurst creates. Remediation and rehabilitation works during and after the mining stage, and a compensation/offset package in respect of residual impacts form parts of the various mitigation measures proposed under BPCP. Technical reports provide recommendations for mitigation of the relevant impacts, which should be appropriately adopted and implemented.			Way of life; Health & wellbeing; Environment	✘	✘	✘
Other perceived impacts, including general opposition to mining.	Perceptions on other environmental effects of coal mining, particularly in relation to contribution to climate change etc., noting that the Project will produce mainly metallurgical (coking) coal, not thermal (steaming) coal. As stated in various sections of the SIA, there is apparent regional support for current operations, which is considered as likely to continue. There is also a level of general opposition to mining in New Zealand more generally, including some opposition within the regional communities. This includes opposition to the FTAA legislation, as it relates to coal mining. This is has included periodic protest action at Bathurst sites. However, there is no evidence to permit a conclusion on the broader extent of this opposition. Because some impacts will remain, it is considered that opposition will also remain.			Environment; Political and governance systems; Fears and aspirations	∅	∅	✘



Other perceived impacts (continued)	Bathurst publishes information on its mining operations that is continuously available to the public and interested parties to accurately inform themselves about various aspects of Bathurst operations. Bathurst also operates a project-specific webpage, which includes a mechanism for receiving enquiries/comments.				
Employment effects: employees and contractors (direct and indirect)	Direct employment with Bathurst will support social and economic interactions of workers and their households. This will indirectly support other employment in the region and district, with similar household social and economic onflows. Indirect employment (with contractors, suppliers, service providers etc.) has similar onflows, some with broader distributions (e.g. transport and logistics service providers). These forms of positive impact will be maintained over the extended life of the BPCP.	Way of life; Community; Health & wellbeing; Personal and property rights	✓	✓	✓
Short term local and regional social and economic effects of construction workforce	The construction stage is expected to create an increase in demand for local accommodation for workers coming into the area. This will create related additional demand for access to other goods and services (e.g., retail, medical, utilities). Research by Bathurst on current market conditions indicates that there may be capacity to manage the additional temporary increase.	Way of life; Community; Health & wellbeing; Personal and property rights	✓	✓	∅
Commercial activity (direct and indirect)	Commercial activity between Bathurst and its supply chains supports positive social and economic onflows for business operators, their employees, their households and the study area economies more generally.	Way of life; Personal and property rights	✓	✓	✓
Bathurst community support contributions (cash and in-kind)	Recurrent (annual) contributions to key regional organisations (e.g. Buller Health Trust, Buller Resilience Trust and various schools. Bathurst continues to hold a regional 'Social Licence to Operate.	Community; Health and wellbeing; Fears and aspirations	✓	✓	∅

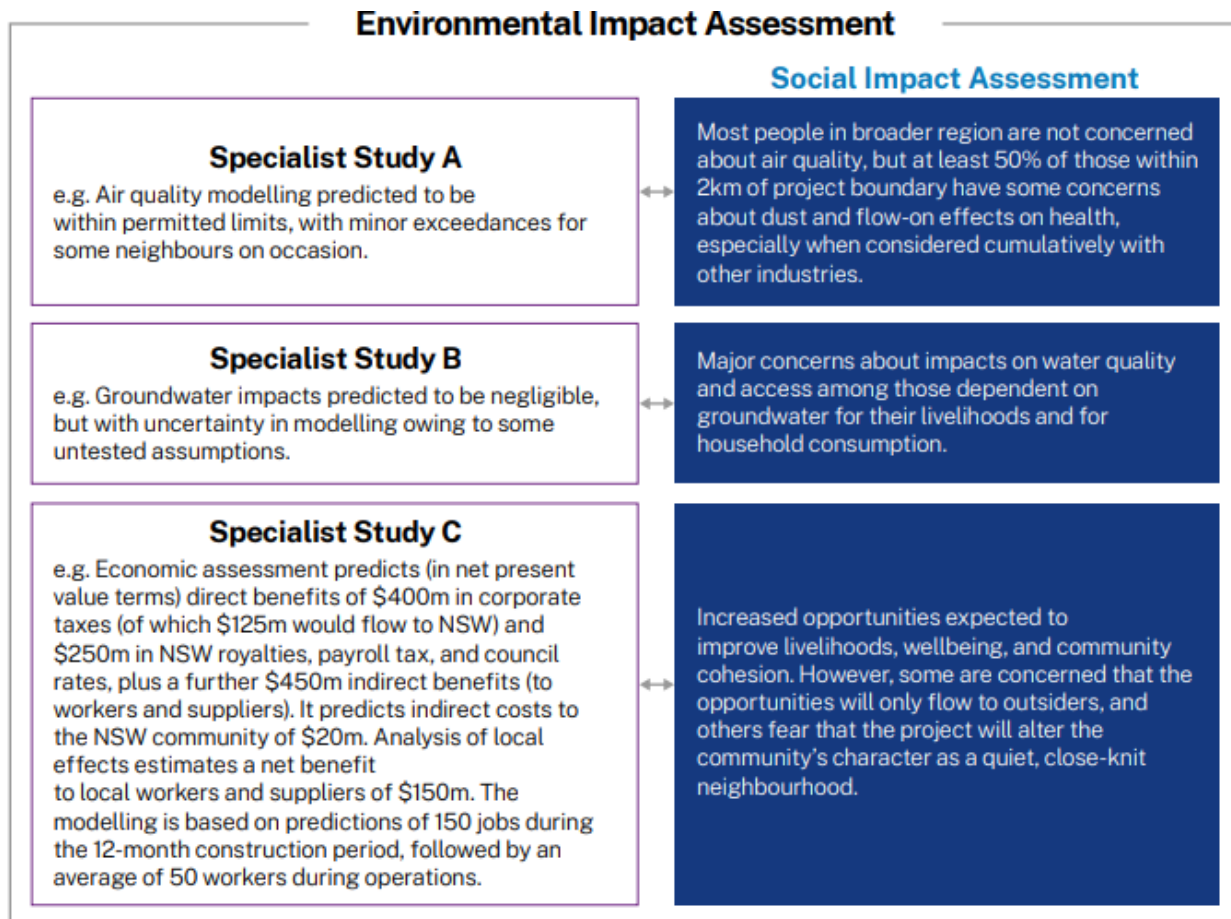


Assessment matter	Description of impact and proposed avoidance, management and mitigation responses	Social impacts potentially indicated	BDC effect	WCRC effect	National effect
Buller Plateaux recreational users	The Recreation and Tourism Assessment (RTA) finding is that “without mitigation the Project has the potential for significant adverse effects on recreation”. Impacted users and user groups may include participants in four-wheel drive, motorcycle (trail bike), mountain bike, trail running and walking activities, across several areas of the plateaux. The RTA recommends various mitigation activities, including: a formal consultation forum and other consultation; focused access arrangements; provision of educational material on plateaux use opportunities; progressive reinstatement of access opportunities on mine closure.	Way of life; Community; Accessibility; Environment	x	x	∅
Cultural values	As manu whenua, Ngāti Waewae have particular interests in preserving relevant cultural values on the plateaux. Ngāti Waewae prepared the BPCP CIA and concluded that; From the perspective of Ngāti Waewae and considering the extensive compensation package proposed, project benefits, and any specific cultural matters, overall, these are likely to deliver a better outcome for Ngāti Waewae and Ngāi Tahu whānui, as well as for taonga species and the wider environment (CIA 2026:7).	Way of life; Culture; Community; Health and wellbeing; Fears and aspirations	✓	✓	∅
Traffic and transport	The Project will result in increased traffic delays and road crash risk on the Denniston Track, particularly during the construction stages. The ITAs include recommendations for addressing potential impacts. These should be adopted and implemented to the extent practicable.	Accessibility; Way of life	x	x	x
Employee contributions to community organisations, activities etc.	BPCP will extend employment of the workforce through to the expiry of any extended consents. This will allow workforce members to remain living in the district/region and contribute to the range of community organisations and activities with which they are involved.	Way of life; Community; Fears & aspirations	✓	✓	∅
Regional/district emergency operations contributions	Bathurst has become an integral part of the district/regional response capability in emergency situations (e.g. natural disasters), through provision of personnel and equipment. BPCP extension of operations will preserve this capability. This may also alleviate demand on other public resources in such circumstances.	Way of life; Community; Environment	✓	✓	✓



Assessment matter	Description of impact and proposed avoidance, management and mitigation responses	Social impacts potentially indicated	BDC effect	WCRC effect	National effect
Long term plateaux impacts (e.g., post-mining landforms and use).	The BPCP extension will result in the disturbance of additional areas of the plateaux. These areas will be rehabilitated at the end of life of mine (LOM). Evidence suggests that these impacts are generally tolerated within the region (although not universally), as they support the socioeconomic benefits of mining, which offsets the adverse impacts. There is some opposition to mining at national level, including within the regional communities, particularly in respect of ‘non-use’ values (e.g. perceived effects), which it is assessed will remain.	Culture; Community; Environment	∅	∅	✖
Cumulative impacts	The cumulative impacts of most elements of the Project are assessed as being applicable mainly during the Project (for example the positive socioeconomic benefits of employment and adverse impacts of land disturbance on the plateaux). There are some positive impacts (for example, continuing development of community cohesion and resilience, and overall impacts on Ngāti Waewae interests) and adverse impacts (such as biodiversity effects) that may endure beyond Project duration. With respect to cumulative physical impacts on the sites, the BPCP is proposed on a ‘greatest extent’ basis; and Bathurst’s aim for its operations is to ‘To disturb as little area as possible for the shortest period of time’ should serve to reduce the time over which these cumulative impacts remain. Based on the balance between positive and adverse effects, and their varying levels of duration and materiality in the context of a continuation of existing activities, effects are assessed as neutral	Community; Environment	✓	✓	∅
			LEGEND		
			Effect assessment	Positive	✓
				Adverse	✖
				≈ Neutral	∅

Annexure 2: Example of relationship between SIA and other Project studies



Source: NSW DPHI 2023: Social Impact Assessment Guideline

Annexure 3: Application of social science methods within the SIA

The New South Wales (NSW) Government *Social Impact Assessment Guideline for State Significant Projects, February 2023* states advises the use of ‘accepted, suitable, qualitative and quantitative social science research methods including workshops and focus groups; interviews and surveys; modelling of different scenarios (e.g. project vs no project); comparative studies; literature reviews; trend extrapolations; and risk/opportunity assessment’ in ‘describing and analysing the predicted nature and scale of likely social impacts for the lifecycle of the project’ (2023:23). Table A3.1 identifies the application of such methods within the SIA.

The following points were considered in the use of these methods and tools:

- The adoption of these methods has been undertaken recognising the status of the NSW Government document as a guideline. As such, there is some implicit recognition that each project will differ, and that the use of methods suggested in the guideline should be tailored to the project specifics.
- Further to the preceding point, although the SIA has been prepared based on the guideline, the prevailing consideration was addressing the relevant requirements of the FTA Act.



Table A3.1: Application of social science methods within the SIA

Table A3.1: Application of social science methods within the SIA		
Description of method	SIA reference/s	Comments on application within SIA
Workshops and focus groups	Section 5.3; Annexure 6	Engagement with key stakeholder groups, canvassing a range of views on the Project.
Interviews and surveys	Section 5.1; Section 5.3; Annexure 6	Engagement with representatives of various community elements (e.g. businesses, schools, social services providers) to obtain first-hand views on the positive and adverse impacts of Stockton Mine and the Project, including in relation to the alternative scenario of mine closure in 2027.
Modelling of different scenarios	Section 1.1 and throughout	Throughout the SIA, the Project outcomes are assessed against the counterfactual alternative outcome of the cessation of mining, nominally on 31 March 2027.
Comparative studies	Annexure 5	The study examines the impacts of previous large scale industrial ‘shocks’ in the Westport area, and assesses the implications of this for the Project
Literature reviews	Not formally included, relevant material and analyses included throughout SIA	The references and footnotes throughout the SIA identify the external sources of information used in the SIA.
Trend extrapolations	Section 3; Section 6; Section 7, Annexure 5.	The SIA assesses the Project against the counterfactual and compares the relative assessed outcomes of the two cases, based on data presented in the SIA, including demographic and historic socioeconomic data (such as in relation to previous industrial shocks) for the regional, district and local areas. The summary material from other technical reports is an important element of these assessments. Because the Project is fundamentally the continuation of existing activity, the base conditions are well understood within these communities and provide a sound basis for predicting Project outcomes
Risk/opportunity assessment	Not formally included, relevant material and analyses included throughout SIA	The SIA compares the likely outcomes of the Project and counterfactual (no project) cases and the risks and opportunities that each entail. Because the Project is fundamentally the continuation of existing activity, the base conditions are well understood within these communities and provide a sound basis for understanding Project and counterfactual case risk, and the relative social impacts assessed for each case.

Annexure 4: Author declaration and supporting material

Aigis Group firm profile

Aigis Group is a small consultancy firm based in Lake Macquarie, New South Wales (NSW). The firm was established in 2004, although the founding partners (Scott Holmes and Mark Sargent) had worked collaboratively on projects since 2002, including social, economic and market research engagements. The firm was established on the basis of its ability to engage the skills of a group of consultants to augment the firm's internal skills as required, and maintains capacity to operate on that basis, as required.

The firm provides a range of research services, including the provision of economic and socioeconomic impact assessments to organisations in the public sector, property development, licensing, mining, and other industries. A summary list of relevant engagements can be provided on request.

Author profile

Dr Mark Sargent (MMktg¹⁰⁸, MBA[Merit], PhD¹⁰⁹) has been the firm's Principal Consultant since 2006 and is the author of this document. Mark's doctoral degree was in politics and specifically, regulatory policy. He has taught public policy at the University of Newcastle, and management at the TAFE Hunter Institute. He has also held a variety of past directorship roles. Mark is a past graduate of the Australian Institute of Company Directors (AICD), and former Affiliate Member (Allied Professional), of the Planning Institute of Australia (PIA).

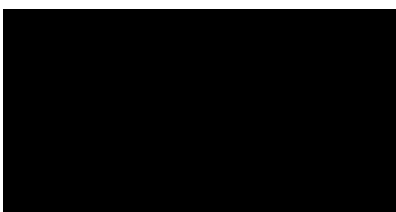
Mark has completed social and economic profiling and impacts research for Bathurst Resources Limited, BT Mining Limited and Minerals West Coast Trust over a period commencing in 2017. This has included conducting the several onsite primary research activities that are reported in the SIA.

Author declaration

The author warrants that:

1. The Social Impact Assessment (SIA) contains all information relevant to the SIA for the Project, which was known to the author at the time of preparation.
2. That none of the information in the SIA is false or misleading.

The author also requires that the reviewer/reader refers to the disclaimer forming part of the SIA (page 1).



Mark Sargent
26 May 2026

¹⁰⁸ Market Research major stream.

¹⁰⁹ Doctor of Philosophy in Politics (Public Policy).

Annexure 5: Brief study: previous significant industrial changes – Buller District

Purpose

This annexure provides material supporting a comparative analysis of previous significant industrial changes in the BDC, and particularly in the Westport area. The counterfactual or base case for the Project is the cessation of mining in early 2027. The material presented considers the consequences of previous events, and the potential implications for Westport and Buller District more generally, on the cessation of mining at Stockton Mine.

Description

Buller District (and by broader association the West Coast Region) have experienced a series of significant industrial change events in the past 15 years. These have been concentrated in the Westport area. Collectively, these events can be appropriately characterised as socioeconomic ‘shocks’. The events included:

- The end of Solid Energy’s management of Stockton Mine.
- The commencement of operations on the Escarpment Project and its subsequent placement into care and maintenance.
- Redundancies at Stockton Mine in response to unfavourable market conditions.
- The closure of the Holcim cement plant.

The decision to close the Holcim plant had been a matter of record for some years prior to the actual closure¹¹⁰. However, its coincidence with the Solid Energy and Stockton Mine issues is assessed as contributing to the overall economic shock.

Table 28 shows these events and their timing, and year-on-year percentage changes, based on data sourced from Infometrics (2025). These are:

- Broad economic measures (GDP, filled jobs and business unit growth).
- Demographics (e.g. population).
- Wellbeing measures (e.g. earnings, income and housing cost measures).

The table shows a period of general decline across these measures that coincides with the series of regional shocks. As is the case at any given time, there may also be other factors influencing the changes in these measures, which limits any definitive, quantitative statements about absolute causality. However, in the context of BDC, the scale of these shocks can be identified with some certainty as significant contributors to the outcomes.

Observations

Observations on the data are:

- Declines in the broad economic measures were generally sustained throughout the period of concurrent and successive shocks. This carries into 2018, which is interpreted as the district economy continuing to recover after this series of events.
- The declines in mean earnings and income measures are interpreted as having been influenced by the decline in the number of filled jobs in the district. The reduction in the higher wages associated with mining employment may also be considered as a contributor to these declines.
- The adverse impacts of disruptions to and/or closure of the major industrial operations may have directly contributed to the decline in business unit growth, in terms of businesses directly trading with them. Also, the associated decreases in jobs would be expected to have manifested as lower aggregate household consumption, which may have also affected business continuation or formation in general.
- The data suggest a relationship between job losses, population decline and the adverse impacts on house values and rents in the immediate term. Departures from the region would notionally increase the available supply of housing and rental stocks, placing downward pressure on prices. This may notionally have been a positive outcome for some existing households in the Westport area, in the form of opportunities to upgrade their place of residence. Property values have recovered in subsequent years. There may be various factors contributing to this, including worker households moving back into the Westport area as issues at Stockton Mine resolved, and the possibility that the fall in values may have attracted some investors into the district.
- Among the factors contributing to these shocks were unfavourable market conditions for Stockton Mine product. Similar circumstances could arise with respect to the BPCP. However, as demonstrated by the continuation of mining since 2016, these effects are temporary and operations at full capacity can resume under suitable conditions, as long as the necessary consents remain in place.

Although these observations may be interpreted as principally describing economic impacts, they also have direct, consequential social impacts. Job losses, declines in individual and aggregate incomes, population and property values can each and collectively impact on the host community's overall wellbeing and functionality. For example, although a reduction in property values may represent a positive opportunity for households, the concurrent reduction in employment and incomes may counter the opportunity.

These effects can be amplified in a small and relatively isolated community and economy, such as Buller District and Westport in particular. Although it is obvious that directly affected households and businesses are affected (i.e. those who lose employment or trade with a large economic entity), the aggregate decrease in activity has 'knock on' effects across the community.

In addition to the statistical evidence in Table 28, it is noted that 50% of the community stakeholders interviewed in 2023 made comparisons between current Stockton Mine operations and the risk of closure, and the impacts of the Solid Energy and Holcim withdrawals from the district and region. Both the quantitative and qualitative evidence demonstrate the significance of having a contextually large, sustainable industrial operation in BDC/WCRC.

The BPCP would effectively establish a significantly later ‘sunset’ date for mining on the plateaux. Based on the evidence presented in this SIA, it is assessed that cessation of mining in 2042, rather than 2027, would contribute materially to supporting better overall outcomes for the regional community.

The proposed extension period presents an opportunity to prepare the district and region for this eventual end of mining on the plateaux. Conversely, cessation of mining at the end of the first quarter of 2027 would create an industrial and socioeconomic shock comparable to those examined in this case study, with no apparent industrial activity of scale to substitute for Stockton Mine’s contributions.



Possible implications for the BPCP

Mining will eventually end on the Buller Plateaux. In the base case scenario, this will occur at the end of the first quarter of 2027, with a substantially lower level of activity over the ensuing period of post-mining activity (i.e. decommissioning and rehabilitation). To support the preparation of this report, the author has directly gathered primary evidence through engagement with Bathurst's personnel and district and regional stakeholders. Bathurst representatives have conducted further engagement and consultation with other stakeholder groups. This is in addition to the external material referenced in the SIA. Based on this material, it is concluded that the Buller District, and to a lesser extent, the West Coast Region, are not adequately prepared for operations ending in March 2027. Furthermore, it is considered that there is insufficient time available to formulate and implement appropriate responses to 2027 closure, notwithstanding Bathurst's cooperative relationships with district and regional authorities.

This outcome would create a lasting regional industrial shock with significant social and economic consequences, which is relatively imminent. Although the actual impacts may be greater or lesser than those observed in the preceding material, based on the evidence presented in this SIA, the outcome would be adverse and significant. It is recognised that the region is experiencing some industrial development, such as mineral sands extraction. However, the evidence presented suggests that there is no industry or individual business unit of appropriate scale that could substitute for Bathurst's activities. This differentiates the base case scenario from the previous industrial shocks observed above, in which disruptions to Stockton Mine were unlikely to become permanent.

Approval of the Project will sustain the opportunities for continued socioeconomic benefit to accrue to the BDC and WCRC economies and communities over the Project life. It would also provide time for the development of a better planned and therefore notionally better executed transition to the district and region's post-mining future, than could be achieved in the base case scenario.



Annexure 6: Bathurst direct engagement – summaries of matters raised

As noted in Section 5.3, engagement is ongoing generally, and with respect to specific stakeholder groups. The material presented in these summary tables is as provided by Bathurst in March 2026. For interest areas in which material is reported for multiple stakeholder group, these are identified collectively by their respective areas of interest (e.g. ‘heritage’), and feedback received from all stakeholders in that interest area is presented.

Engagement with regulators is being undertaken as part of Project development. These engagements principally relate to technical matters, which are addressed in the AEE technical reports in respect of each matter. Similarly, commercial engagements with plateaux infrastructure owners (for example) are also not reported.

Table A6.1: Summary of Bathurst BPCP stakeholder group engagement

Table 20: BPCP Stakeholder Groups		
Stakeholder Group	Purpose	Summary of matters raised by stakeholder group
Stockton and West Coast Employees	Project update Consultation schedule Community feedback	- Observed opposition to the Project and/or FTAA, and potential impacts on BPCP. - Concerns about delays in approval process, which may result in redundancies. - Employees see the approval process as a period of uncertainty. Suggestion that other options for employment may have to be investigated. - Discussion on public and recreational access to the plateaux for various purposes.
Employee Union Representative	Project update Consultation schedule	- Timing of the submission and subsequent timeframe for approval was a key matter discussed as a delay in approval could lead to an impact on coal production levels which would in turn result in a reduction in employment levels. - Possible scenarios impacting on the FTA as an outcome general election to be held in November 2026. - Importance of employment on the West Coast and to maintain employment in areas such as Westport.



Table 20: BPCP Stakeholder Groups		
Stakeholder Group	Purpose	Summary of matters raised by stakeholder group
Iwi	Effects assessment update Prepare Cultural Impact Assessment	- Consultation and engagement are anticipated to continue throughout the application, mine development, and operational phases of the project and then through into mine closure and relinquishment. - Team meeting with Te Rūnanga o Ngāti Waewae to discuss the scope of the BPCP. A copy of the draft Position Description was provided prior to the meeting for review. - The meeting outcomes were that the CIA needed to progress once the effects assessments had been completed.
Industry	Effects assessment review to determine impacts / opportunities for industry relating to water, access, and mine operations.	- These engagements relate to commercial and operational matters and are not further reported here. - In each instance, Bathurst is in continuing consultation/negotiations with these parties.
Utility groups	Ensure privately owned infrastructure is protected	- These engagements are commercial in nature, principally relating to protection of, and access to existing infrastructure on the plateaux. Access is required for repair and maintenance activities. - In each instance, Bathurst is in continuing consultation/negotiations with these parties.



Table 20: BPCP Stakeholder Groups

Stakeholder Group	Purpose	Summary of matters raised by stakeholder group
Recreation	Minimise effects of mining operations on recreational activities	Discussions to date have been positive with both groups acknowledging our project however also want to ensure that some degree of access is maintained. In the initial stages it is proposed that: • A basic level of access to Mt Rochfort and along the UWHR to Mackley Track to be maintained throughout the LoM. It is proposed that this will be via a specified number of days annually, with the ability to apply for additional days for specific events – for both the public and club members. • We envisage that we will develop one protocol that is agreeable to both clubs. • The road to Mount Rochfort will pass through an active mining area and to Mackley Track along approx. 4 kilometres of the UWHR. • The initial basic level of access will be via nominated days where we will escort four-wheel drivers through the specified mining area (or along the UWHR) and then escort again for the return journey. There may be further opportunities to have further access arrangements once operational requirements are better understood. • Further consideration to be developed in partnership with the Clubs is an education piece (online) and wayfinding signage about remaining four-wheel drive opportunities. A stand-alone website would be preferred, with a requirement for Bathurst to maintain it with up-to-date data and minimum response times to queries.



Table 20: BPCP Stakeholder Groups		
Stakeholder Group	Purpose	Summary of matter raised by stakeholder group
Environmental Interest Groups	Scope of the BPCP and the assessment undertaken, authorisations sought etc.	EDS • Clarification on the status of the land across the project application area (PAA) and review of Stewardship Land including will Bathurst submit FTAA while this matter is still under review. • Clarification on submission timeframe (and how above assessment may affect this). • Overview of peer review process that will be implemented and EDS advised of comfort in this process. • Confirmation that a social and economic effects assessment will be undertaken. • Confirmation that projects are bonded to cover rehabilitation and closure. • What is the consultation process with DoC – will they be consulted with? • When is this likely to occur? • Do not want to duplicate process. • Who is the market for the coal (outlined key customer summary and referral to Annual Report) and shareholder split (NZ / overseas). • EDS see consultation as releasing the full AEE and having package of information early would be helpful. EDS key focus is ecology. • Does the proposed life of mine include closure / rehabilitation – yes? • EDS see the biggest loss to ecology is from proposed activity on Escarpment. • Would our proposal include offset as well as rehabilitation. Yes, but scope of offset is unknown at this stage. • Is underground mining an option in areas not previously subject to mining in areas where ecology is high.



Environmental Interest Groups (continued)

WCCB/F&B¹¹¹

- BRL provided an overview of the Project as it stands to date. Reinforced our internal process to ensure robust assessment via independent peer review; consultation with key stakeholders throughout the process (both to inform and discuss impacts and negotiate consenting and compensation packages).
 - There were a number of F&B people listening to the presentation both locals (in person) and online (Head Office and legal F&B staff).
 - Mining will have an impact on the ecological and biodiversity values of the Denniston Plateau which are far greater than the isolated economic benefit. (Important to note that they used this term isolated benefits)
 - Need to protect the Plateau (Denniston) from mining – ongoing mining will mean that these values will be lost.
 - At Stockton the values are gone due to mining; so, the ecological and biodiversity values at Denniston are especially important and should be protected.
 - Re-Classification of stewardship land - noted this process is ongoing (also a question from the Board during BRL presentation how the reclassification will affect the application). They expressed concern that the recommendation was for the Plateau to be reclassified as Conservation Park, meaning that mining can occur. Their position in their submission was that this is not acceptable, and it should be classified as Scientific Reserve.
 - Rehabilitation (no matter how good) does not mean ecosystem restoration. Rehabilitation cannot restore the land once it has been mined.
 - AMD – financial liability to the government is significant (\$3m pa).
 - Some confusion on Council decisions on the original Escarpment Consents and the findings from those and did not really acknowledge the succeeding Court processes. Spoke about the Council panel identified that the area needed to be protected, and they would not allow infrastructure to be included at the site so not to give any indication that
-

¹¹¹ West Coast based F&B members.



Environmental Interest Groups (continued)

mining will be ongoing. (However, this is incorrect and these consents were approved).

- Referenced bioblitz and other information sources - encouraged Board to reach out for assistance in their assessments and advice on the application. Clearly seeking to use the Board as an avenue to convey their position on the proposal through to the decision makers.
- BRL seeking Peer Reviews of all their scientific information, query as to whether some if it is outdated.

The DOC *Conservation Boards'* Newsletter, Issue 36 (July 2025) reported on the meeting as follows; '*FastTrack legislation has attracted attention of the Board with presentations by Bathurst Resources for the Buller Plateaux Continuation project and Westpower for the Waitaha Hydro scheme. Both parties plan to lodge their applications this year. Forest and Bird members also attended the Bathurst Resources presentation and gave a presentation relating to conservation values of the Denniston Plateau*'¹¹².

¹¹²DOC *Conservation Boards'* Newsletter, Issue 36 (July 2025). < <https://www.doc.govt.nz/news/newsletters/conservation-boards-newsletter/> >



Table 20: BPCP Stakeholder Groups		
Stakeholder Group	Purpose	Summary of matters raised by stakeholder group
Heritage	Demonstrate that heritage matters adequately assessed and management strategy in place for LoM	• In terms of cultural heritage matters, an update on Ngāti Waewae and Te Rūnanga o Ngāi Tahu engagement and response to the application would be helpful to enable us to provide more informed advice on the project. • The application may impact the Roroa (Great Spotted Kiwi) and their habitat, which is a legislated taonga species for Ngāi Tahu. Some mention their mitigative efforts and how they would ensure the Roroa and their habitat are protected from the extended mining space and associated activity, would also be needed. • Bathurst and Clough and Associates to provide Heritage New Zealand Pouhere Taonga (HNZPT with the draft archaeological assessment and seek of more informed and detailed feedback on the application. • Bathurst to continue consultation to discuss potential mitigative efforts in respect of archaeology and effects on heritage values. • DOC presented options for restoration/rehabilitation of the Banbury UG Mine – to be closed and walking track installed – currently apparent lack of resources from DOC. Opportunity for compensation here? • Bathurst employee presented overview of the BPCP and indicated once Heritage report completed, to work with Trust for ideas on options for compensation/mitigation. • Briefly discussed options for the Watson’s Mill track re-establishment – general support for this. • The likelihood of artefact finds (predominately mining) and artefact types that may be recovered. • Willingness to consider all artefacts recovered to store, curate and display at the museums (Friends of the Hill (FOTH) - Denniston finds / Northern Buller Museum (NBM) - Stockton finds). • The likelihood of more finds in 19th century mines as opposed to mid-late 20th century mines where all items generally removed. • Neither museum has a developed Artefact Management Plan, but NBM did forward their Concept Plan.



Heritage (continued)	• Commitment to keep on consulting and both FOTH and NBM expressed a willingness to help. • Main issue is the funding for artefact retention / curation / conservation / display for both FOTH (particularly) and NBM and the time involved for volunteers.
Communities of Interest	Engage with adjacent communities to advise of the BPCP and specific areas of interest and amenity change. Ngakawau Hector Reserve Board Trust Feedback • No areas of concern were raised in relation to Bathurst’s use of the reserve and when the Agreement is for renewal it was indicated that there may be an opportunity to strengthen clauses to prevent unauthorised access (in response to current protester activity). • Trucking – Bathurst will maintain the ability to truck in its consent as an alternative and worst-case scenario should the proposed UWHR and rail loading infrastructure cannot be used for any reason (or if the UWHR is completed in time for production needs. This would be the preference for all parties. Both Bathurst and communities suffered the costs and impacts of trucking during the Tawhai tunnel repairs. • Ongoing community support from Bathurst of community projects and facilities is highly valued and appreciated. • In terms of end of mine life discussion there has been a desire expressed in the past by various people to retain some key assets for future generations – for other industry and certainly for tourism. The ones we know are on that list are: • The workshop at Ngakawau – of interest historically but also for other industry or future tourism purposes. • The aerial infrastructure from Ngakawau to Station 5 – of interest for future tourism. • The railway line between Ngakawau and Westport (or from Granity to Westport) – of interest as a commuter option for the workforce and residents in Northern Buller to get to Westport and back and of interest to future tourism. Assistance with a business case for this and early discussions with the decision-makers at KiwiRail would be valuable.



Communities of Interest (continued)		Ngakawau residents • [REDACTED] • [REDACTED] • [REDACTED] • [REDACTED] • [REDACTED] • [REDACTED] • Engagement with 4 residents • 2 residents reported no issue. • 2 residents report no issue overall but identified some noise effects, which can be managed.
Adjacent Landholders	Identify adjacent landholders in accordance with FTAA requirements.	• Bathurst is engaging with a private landholder with respect to acquisition of the subject land.
DOC Concession Holders	Advise concession holders of the BPCP to identify if there are any competing / conflicting interests in concessions held.	• Engagement continuing.
Statutory Authorities	Provide overview of the BPCP and identify if there are any potential conflicts arising from the proposed BPCP in relation to recreational fishing, hunting and heritage.	• Engagement continuing.



Table 20: BPCP Stakeholder Groups		
Stakeholder Group	Purpose	Summary of matters raised by stakeholder group
Regulators	Provide overview of the BPCP and engage to seek specific authorisations and permits and agreements required for the FTA approval to be secured.	Buller District Council 18 – 24-month start-up phase requiring additional truck/traffic along road Denniston to Stockton. [REDACTED] - Need contingencies for weather, rail route unavailable, road route unavailable (Emergency scenarios) - BDC – no major work planned on Denniston Track, just seal maintenance - Options of contributions on per tonne basis used elsewhere - Existing Trucking - HPMV permit now granted for Waimangaroa overbridge - Most issues are through town related to pavement conditions although State Highway has deteriorated, also hours of operation is an issue (to consider for trucking going forward). <u>Ngakawau Road Reserve</u> - Recommend obtain licence to occupy in first instance and then progress with road stopping as this takes time. Joint engagement BDC and WCRC - Construction phasing - increased leniency/recognition of potential for increased risks during the construction phase. - Integration with DOC. - Mine Creek Sump. - What/who experts engaged?



Table A6.2: Community engagement sessions summary¹¹³

Table A6.2: Community engagement sessions summary		
Acid Mine Drainage		
Question/comment	Response	Follow-up
Recent media article about the cost government spent more in 2024 treating historical AMD than received in royalties https://newsroom.co.nz/2024/12/02/all-of-govts-2024-coal-earnings-spent-treating-damages-at-a-single-mine/	- Water management systems in current workings are effective in capturing, monitoring and treating water. - Data shows improvement in water discharge to Ngakawau. - Water entering in historic underground mine workings may not be captured by our water management systems and water with higher acidity can enter the catchment. - BRL is involved in efforts to continually improve Ngakawau River catchment water quality, working with iwi, the Crown and councils will recover Stockton plateau streams impacted by acid mine drainage to a level that will sustain ecology and mahinga kai values within 3 generations (80 years).	Need to formalize company response in relation to recent article. Water treatment and river quality improvements to be articulated to identified stakeholders - downstream users (e.g. fishing), stakeholder group (NRW), Iwi, BDC etc. to become a key message for project performance and closure.

¹¹³ Source: Bathurst Resources Limited 2026. Buller Plateaux Continuation Project, Stakeholder Engagement Report. March 2026



Table A6.2: Community engagement sessions summary

Waimangaroa Water Supply

Question/comment	Response	Follow-up
Will the proposed mining on Deniston Plateau impact on water storage supply for Waimangaroa?	• Showed project plan – Escarpment extended and water supply areas not within proposed mine areas	This is a long-term issue catchment is potentially affected by transport route from Waimangaroa – needs to be addressed.
Opportunity to assist with community issues here as currently costs are ballooning. Council has been trying to address this for 15+years with no solution.		To scope options with Council?
Water bores downstream - animals water vs human water take		Groundwater report to identify far field effects.
Will there be any impact on downstream water quality or quantity (incl. water bores or impact to irrigation for farming)		
	It was explained that the Waimangaroa River is already impacted by AMD seepage from historic mining, however any discharge from future Bathurst Operations would be governed by a suite of consent conditions to manage water quality.	Query existing surface water takes from river upstream and downstream of highway and see who may be impacted.



Table A6.2: Community engagement sessions summary

Haul Road Alignment

Question/comment	Response	Follow-up
Seek clarification on haul road alignment and how will the proposed haul road cross the Waimangaroa River	Haul road alignment still under review – possibly bridge but may realign into Cypress area	- Update once alignment is confirmed - Develop engagement strategy for Waimangaroa community
What is the width of the haul road – seeking understanding of the extent of the ‘upgrade of existing tracks’	Haul road alignment is still under review	Update once alignment is confirmed
Why is it not over the sandstone pavement?	Less ecosystem effect	Nil.
Why do we need an MFS RD and a UWHR?	Driving up to MFS and onto Stockton too high	Nil.

Water Monitoring at Stockton

Question/comment	Response	Follow-up
How is water monitoring undertaken at STO	Plan of water monitoring sites demonstrated the network of the monitoring regime. Monitoring undertaken by a combination of real time monitoring (RTM) and physical monitoring.	Incl water monitoring (current and proposed) in future FTA consultations and cover all sites.



Table A6.2: Community engagement sessions summary

Life of Mine

Question/comment	Response	Follow-up
How much coal is there and at what rate will it be mined each year?	The total estimated coal is 20 million tonnes which will be mined at a rate of up to 900,000 tonnes per year.	Nil.
If approved what will be the life of mining?	The current coal mining license expires in 2027. Bathurst is seeking an extension to mine for a further 25 years. Progressive rehabilitation will be undertaken however final rehabilitation and environmental monitoring will continue beyond that time to ensure that mine closure objectives have been met.	Nil.



Table A6.2: Community engagement sessions summary

Socio-economic

Question/comment	Response	Follow-up
Why should we support this project when all the profits are sent overseas and there is no benefit to the community (reference to poverty in Westport)	Provided an overview of the socio-economic contribution per the project summary (pamphlet). Direct economic benefit is a key factor for Westport – consider impact if the project did not get approved and mining was to cease.	Nil.
How many people will be employed?	The Stockton mine directly employs approximately 390 people. These positions would continue if the Project were approved. Contractors are also engaged to support the mines operation and numbers vary depending on operational requirements.	Maintain key messaging on socio-economic benefits per EIA & SIA.
Will there be a need to employ more mine workers?	It is likely that the current workforce numbers will be retained. However, employment opportunities do arise from time to time and there may be specific campaigns where more mine workers are needed (for example, construction of new extension areas).	Nil



Table A6.2: Community engagement sessions summary

Amenity Impacts		
Question/comment	Response	Follow-up
Waimangaroa landholder asked if they would hear and see the proposed Project given the diverse elements	The technical assessments will determine the potential extent of impact and identify mitigation measures to minimise potential impacts to nearby landholders.	The landholder lives near Collins Road.
Will there be amenity impact at Millerton	We currently manage these at existing operations and are required to comply with regulatory requirements. It is envisaged that the same (or similar) regulatory requirements will be in place.	Need to scope impacts for Millerton Residents as understand there may be some visual and noise impact (particularly from blasting). BRL to consider Millerton community briefing early 2025.
[REDACTED]	Deep Creek Mining Area is unlikely to be visible from the Waimangaroa township, however some indirect light may be seen particularly on cloudy nights.	Nil.
[REDACTED]		
[REDACTED]		
[REDACTED]		
[REDACTED]		
[REDACTED] ?		
Ngakawau Hector Reserve Land		
Question/comment	Response	Follow-up
Ngakawau Hector Reserve Land – issue with TTPP MINZ zone over private residences, and interaction with FTA proposal	Reassured no mining in this area To ensure that final plans do not include private residences	Discuss with Council over easements/private arrangements over Council reserve lands



Table A6.2: Community engagement sessions summary

Approvals - FTA

Question/comment	Response	Follow-up
What is the schedule of development should we get approval	Approx schedule discussed	The Fast-track Approvals Bill passed its third reading in Parliament on Tuesday 17 December. Projects will be accepted from 7 February.
What will happen if we don't get approval	Use current RMA processes, Mine Closure/ongoing rehabilitation	What does plan B look like?



Table A6.2: Community engagement sessions summary

Trucking

Question/comment	Response	Follow-up
When are rail operations scheduled to recommence?	- KiwiRail stated towards the end of January 2025. STO will not be hauling coal from Xmas eve (afternoon) until 6 January. - Locos are on track now assessing safety and maintenance.	Nil.
Can BT consider injecting funds into some of the roads in the community (not referring to main roads / highways)	- Unlikely as the small suburban road network (in smaller villages) is collectively a large network. - How do you prioritise?	Nil.
Haul trucks not coming to a complete stop at the Tyler Road intersection	Noted – will pass on	This issue needs to be incorporated into transport study
Interim trucking Denn to Stockton	To consider T intersection at Denniston –requires signs and consideration of residents	Follow up with Residents once draft proposal developed Also to meet with Denniston Residents Assoc.
How will you transport coal from the proposed new mining areas to the current coal handling facility?	- The Project includes developing a link between the Denniston and Stockton Plateau, for the purpose of transporting coal, mobile plant and personnel between the two areas. - Three options have been considered with the Upper Waimangaroa Haul Road (UWHR) being the preferred option. - The UWHR connects with the Cypress haul road to take coal to the Stockton coal processing plant.	Provide further details once alignment is known; areas / scope of upgrade etc. Need to engage with community re the public road network will most likely need to be utilised for access and to haul coal to Ngakawau and Stockton, while consenting and construction of the haul road is being completed.



Table A6.2: Community engagement sessions summary

Waimangaroa - general

Question/comment	Response	Follow-up
[REDACTED]		Enquiry to be made re costing – may consider a contribution.
[REDACTED]		
[REDACTED]		

Denniston – general

Question/comment	Response	Follow-up
Has there been consultation with other minerals owners on Denniston?		Seek clarification / identify other minerals owners
Gold miners in river - consultation		
CIA Stockton and project		BRL follow up actions initiated.

Other

Question/comment	Response	Follow-up
Where is Hydro scheme project?	With Treasury, not part of FTA	none
Will you progress with Mine Creek Sump under FTA?	probably	None
Why was the somewhere in the Ngakawau River coated in grey material?	Person to supply BW with date and location	Respond once details passed on
Will we mine Marshalls?	Not part of FTA	
[REDACTED]	BRL has followed up with via email to acknowledge request. Stated will investigate further.	BRL follow up actions initiated.
[REDACTED]		
[REDACTED]		
Are we currently looking for workers?	Yes, job adverts are currently posted on Seek and local newspapers etc.	

Annexure 7: Response to matters raised in SIA peer review



BULLER PLATEAUX CONTINUATION PROJECT SOCIAL IMPACT ASSESSMENT Response to matters raised in SIA Peer Review

Introduction

1. This document provides responses to certain matters raised in the Social Impact Assessment (SIA) Peer Review (PR) prepared by Julie Boucher (Just Add Lime [JAL]), for the Buller Plateaux Continuation Project (BPCP).
2. The author wishes to acknowledge Julie Boucher's (JAL) contribution to finalising the SIA. This has supported the preparation of the following additional material.
3. This document specifically:
 - a. Clarifies issues raised in relation to community engagement.
 - b. Responds to issues identified by JAL that may have been addressed in more detail in the SIA.
 - c. Addresses impact management recommendations proposed by JAL.
4. The document addresses these matters sequentially, as presented in the PR.

Community engagement

5. Items 41 to 44 in the PR address community engagement material presented in the SIA. The PR acknowledges that the SIA identifies limitations in respect of stakeholder interview material, noting that the identification of research limitations is standard practice. JAL identifies those limitations as:
 - a. Potential selection bias with respect to parties interviewed.
 - b. The engagement program did not specifically relate to the BPCP.
6. The relevant community engagement material is presented in Sections 5.1 and 5.2 of the SIA (engagement conducted in November and December 2023). Further material on engagement conducted directly by Bathurst in relation to the BPCP is addressed in Sections 5.3 and 5.4 of the SIA, with supporting material presented in Annexure 6.

7. The two limitations apply to the material reported in SIA Sections 5.1 and 5.2. To the knowledge of the author, these limitations do not apply to the engagement material presented in SIA Sections 5.3 and 5.4 and Annexure 6, which was directly conducted by Bathurst, in relation to BPCP and which involved a range of stakeholders.
8. With respect to potential selection bias, this was to some extent unavoidable, given the small populations in the study areas, and the longstanding presence of Bathurst and its workforce within the relevant communities. Furthermore, the stakeholders interviewed included representatives of local and regional governments and other public agencies, which are charged with fostering the interests of the entire communities which they serve. This was considered as mitigating any potential bias to some extent.
9. As is stated in the SIA, the engagement program reported in SIA Sections 5.1 and 5.2 predated commencement of preparation of the BPCP FTAA application. However, the SIA also notes that the outcomes of these interviews were intended for use in subsequent consenting and related activities. The material from the interviews therefore contributed to describing the baseline circumstances, against which the BPCP must necessarily be assessed.
10. Further to the engagement program reported in SIA Sections 5.3 and 5.4, the SIA also identifies that BPCP-specific engagement and reporting were continuing at the time the SIA was completed. Some of this engagement involves stakeholders who are not supportive of mining by Bathurst and/or more generally. It is understood that complete reporting on these engagements will be lodged with the BPCP AEE.

Perspectives

11. PR Item 50 addresses the impacts of perceptions regarding the BPCP. PR Item 50(a) identifies that the community cohesion may differentially affect certain groups in the community. Aspects of community cohesion and the contributions to this that the BPCP is likely to maintain are addressed in various parts of the SIA¹¹⁴. It should also be noted that any changes may either be positive or adverse, depending on the impact and the perspectives of relevant stakeholders.
12. Section 3.6 of the SIA states a conclusion that because the BPCP would essentially entail similar socioeconomic impacts to existing operations, it is considered as unlikely that the circumstances of any specific groups within the community would be materially, differentially impacted by the BPCP, should consent be granted.
13. Conversely, in the counterfactual/base case, if consent was not granted, mine closure would result. There would be general, adverse impacts on the community, and some vulnerable parts of the community may be more susceptible to such impacts. An example is the potential for increases in electricity costs should mining cease (SIA Section 5.2.2). [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
14. PR Item 50(b) addresses impacts on people's perceived ability to participate in processes relating to mining and the BPCP, which may influence or affect their decision-making. It is

¹¹⁴ For example, SIA Sections 4.5.4; 4.5.10; 5.2.1; 5.2.2; 6.3.2; 6.4.3.3; 6.3.5; 6.7.3.



acknowledged that this perspective is not addressed in detail in the SIA. In this regard, Bathurst is continuing with stakeholder engagement in relation to the BPCP. It is also relevant that Bathurst is well-established in the region, in terms of community access, and the effects of mining on the plateaux are well understood within the community.

Precautionary principle

15. PR Item 53 identifies that potential impacts on vulnerable population groups, are ‘less developed’. JAL states that the SIA assessment describes *‘changes to baseline conditions, not impacts, which involve a change in behaviour, material circumstances or lived experience of a person or group of people’*. It should be noted that such impacts may be either positive or adverse.
16. Consistent with the SIA, the author maintains that because the BPCP would fundamentally involve similar effects and impacts to existing operations, including in respect of impact mitigation and management, it is unlikely that the BPCP of itself would result in differing, material impacts (either positive or adverse) on specific parties such as those identified. The closure of the mine in the absence of consent is assessed as likely to adversely impact the community generally, and potentially differentially affect some of the people and groups identified by JAL.
17. The conclusions reiterated above are consistent with the application of the ‘uncertainty principle’ (SIA Section 2), a summary of which is reproduced for convenience: *‘it must be recognised that our knowledge of the social world and of social processes can never be fully complete because the social environment and the processes affecting it are changing constantly, and vary from place to place, and over time’*¹¹⁵.
18. The uncertainty principle is relevant to the assessment of changes in behaviour, material circumstances or lived experience of individuals or groups as proposed by JAL in this instance, in the context that the BPCP is likely to result in similar conditions and impacts to existing operations. Therefore, the responses of particular individuals or groups to the BPCP at these levels may vary significantly.

Comment on prediction and analysis of social impacts

19. PR Item 55 addresses similar issues to PR Item 53. The comments in Points 13 to 16 of this document are relevant to this issue and therefore are not repeated.
20. PR Item 62 states that ‘no negative social impacts of the BPCP not proceeding were found to have high or very high significance’. Impacts are summarily assessed by likelihood and magnitude in Table 27 of the SIA. Impacts in relation to the long term ecological and physical impacts on the plateaux including in relation to use, are assessed as ‘A3’ for the ‘without BPCP’ base case. The resulting impact rating is ‘high’ (magnitude ‘moderate’ and likelihood ‘almost certain’).
21. In relation to PR Item 62, it is important to note that in terms of the *positive* impacts, most of those for the BPCP are assessed as being substantially greater than for the base case scenario,

¹¹⁵ Vanclay, F. 2003. International Principles for Social Impact Assessment, *Impact Assessment and Project Appraisal* volume 21, number 1, March 2003, pages 5-11. Beech Tree Publishing, Surrey, UK.

of mine closure in March 2027. The result is that overall, the BPCP would result in substantially greater net positive outcomes than would the base case.

Comment on impact management, mitigation and measurement

Mitigation and management

22. The recommendations in PR Item 75 are acknowledged as being appropriate additional or supplementary measures to those addressed in the SIA.
23. PR Item 75(a) recommends the establishment of a complaints management system. Although this is not specifically identified in the SIA, there is an extant Bathurst Resources Limited [REDACTED] This includes an Incident Response and Notification Matrix, which in part addresses community complaints. It is recommended that this Standard be updated to more specifically address handling of community/public complaints. Alternatively, a separate Standard may be developed, as proposed by JAL.
24. With respect to PR Item 75(b) (community investment plan), Bathurst advises that it has established and contributes to the Buller Resilience Trust, whose objectives include to assist with the transition from mining in the district.
25. Bathurst further advises that a new group-wide community sponsorship / investments policy is being developed. The policy is currently at internal consultation stage.
26. It is recommended that when complete, these standards and policies should be applied to the BPCP.

Monitoring and reporting

27. PR Item 76 identifies that a Social Impact Management Plan (SIMP) framework is not included in the SIA. The following observations are made:
 - a. A SIMP was discussed with Bathurst during preparation of the SIA and it is agreed by the author that a SIMP should be developed for the BPCP, if the assessment process determines that this is warranted. This is consistent with the additional recommendation proposed in Item 79(a) of the PR.
 - b. Because the BPCP is an extension of the existing Stockton Mine operation, its impacts are assessed as being well understood by the BPCP communities. Therefore, existing impact management practices, and additional BPCP-specific initiatives (including technical report recommendations, such as in relation recreational access to the plateaux, for example) can be used to provide a framework for development of the SIMP.
 - c. A redacted example of a draft SIMP framework prepared by Aigis Group for a non-mining project in New South Wales, Australia, is included in Annexure 1, for reference. Material for one impact is shown. The entire SIMP would entail replication for each impact category, with the relevant, specific detail included.
 - d. It is also noted that the NSW Government SIA guidelines acknowledge that the preparation of a SIMP is largely a ‘*post approval*’ process, which ‘*verifies and refines*



*how social impacts are managed, depending on the conditions of consent or approval*¹¹⁶.

28. PR Item 79(b) recommends the regular publication of BPCP specific material. This is consistent with SIA Section 8.3.1.5, which recommends electronic distribution of information and/or updates on the BPCP. The PR recommendation is supported as presented.

¹¹⁶ NSW Department of Planning, Housing and Infrastructure 2026. Social Impact Assessment Guideline for State Significant Projects. February 2023, page 12.
< <https://www.planning.nsw.gov.au/policy-and-legislation/under-review-and-new-policy-and-legislation/social-impact-assessment> >



ANNEXURE 1: EXAMPLE SIMP FORMAT & CONTENT

Observations

- The SIMP example below (Figure A.1.1) addresses one source of impact risk in relation to the relevant project. For this project, the entire SIMP addressed 16 sources of impact risk, along with supporting material.
- Content was prepared in this format for each source of impact risk.
- The full SIMP also included an impact risk assessment on similar bases to that reported in the SIA Table 27. This is also presented in Figure A1.2 for reference.



Figure A1.1

DESCRIPTION OF IMPACT & IDENTIFIER	SI-01: Potential land use conflict between [REDACTED]
LOCAL/REGIONAL EFFECT	Local
COMMENT (as applicable)	Conflict may occur between [REDACTED] However, [REDACTED] uses are 'not intrinsically incompatible'.
Category/ies of impact	Health and wellbeing
Project lifecycle	Ongoing
Who will be affected?	[REDACTED]
Mitigation or enhancement	Condition (4) requires provisions relating to: (a) [REDACTED] [Refer Operational Management Plan Section]. (b) [REDACTED] [Refer Operational Management Plan Section] (c) [REDACTED] [Refer Operational Management Plan Section]. (d) [REDACTED] [Refer Operational Management Plan Sections].
Desired community outcome	Reduce risk relating [REDACTED]
Responsibility	[REDACTED] External party actions are not the responsibility of [REDACTED]. However, implementation of the Plan of Management provisions set out below should form the basis of [REDACTED]'s involvement in resolving any issues.
Measuring effectiveness (indicators and target)	Reduction in adverse event reports [REDACTED]
Method (data and source)	Compliance with Operational Management Plan/Plan of Management Sections: 4.2 [REDACTED] 4.6 [REDACTED] 4.7 [REDACTED] 4.8 [REDACTED] 5.4 [REDACTED] 5.5 [REDACTED] 5.6 [REDACTED] 5.7 [REDACTED] 5.8 [REDACTED] 5.9 [REDACTED] 5.11 [REDACTED] 5.12 [REDACTED] Adverse Event Reports [REDACTED]

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