BATHURST RESOURCES LIMITED

Hazardous Substances Management Plan

Buller Plateaux Continuation Project

August 2026

BPCP-ENV-PLN-014 Rev0 – Issued Version

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Glossary of Terms and Abbreviations

Term	Definition
ACML	Ancillary Coal Mining Licence
ANE	Ammonium nitrate emulsion
Argoshield	A shielding gas mixture, typically used in welding.
AWP	Annual Work Plan
Bathurst	Bathurst Resources Limited, including its subsidiary companies BT Mining Ltd, Bathurst Coal Ltd, and Buller Coal Ltd
BDP	Buller District Plan
Blasting precursors	Materials used in preparing explosives, such as ammonium nitrate products, gasser, diesel, and paraffin oil.
BPCP	Buller Plateaux Continuation Project
Buller Plateaux	A collective reference to the Stockton Plateau and Denniston Plateau
CaO	Calcium oxide, also called quicklime
$Ca(OH)_2$	Calcium hydroxide, also called hydrated lime
Certified Handler	A person who holds the required regulatory certification to manage certain hazardous substances
ChemAlert	Bathurst system used for maintaining and accessing hazardous substances inventories and Safety Data Sheets
CHPP	Coal Handling Processing Plant
Class 1 explosives	Hazard classifications covering explosives such as packaged explosives, boosters, and detonators
Class 3.1 flammable liquids	Hazard classification for flammable liquids such as diesel and petrol
Class 5 oxidising substances	Hazard classification for oxidisers used in blasting and other activities
CML	Coal Mining Licence
Controlled Substance Licence	A regulatory licence required for certain controlled hazardous substances.
Corrosive water treatment chemicals	Chemicals used in water treatment that can cause corrosion and require specific containment and handling controls
Diesel tank farm, or fuel farm	A designated fuel storage area for diesel
Double-skinned tank	A tank with two walls designed to provide built-in secondary containment
Ecotoxic fuels	Fuels classified as harmful to ecosystems if released
EMS	Environmental Management System
Emergency response systems	Systems, equipment, and procedures used to respond to incidents such as spills, leaks, and fires
EPA	Environmental Protection Authority
ESE	Escarpment Extended Project sub-area
Exothermic	A reaction that releases heat. In the Plan, this refers to lime slurry preparation
Fire-fighting foam	Foam used in fire suppression and emergency response
Flocculants	Chemicals used to help suspended particles settle out of water during treatment
FTAA	Fast-track Approvals Act 2024
Gasser	A blasting-related substance used in explosive mixtures

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Term	Definition
GM	General Manager, also referred to as the SSE
HSEC	Health, Safety, Environment, and Community
HSG2	Approved Code of Practice for the Storage of Class 3.1 Flammable Liquids
HSNO	Hazardous Substances and New Organisms Act 1996
Hydrated lime / lime slurry	Calcium hydroxide used in water treatment and processing systems
km	Kilometres
LDP	Lime Dosing Plant, a facility where lime is prepared and/or dosed into water treatment systems
Magnesium oxide	A potential future water treatment chemical identified in the Plan
Magnetite	A substance used in coal processing and separation
MFS	Mount Frederick South Project sub-area
Mine-affected water	Water influenced by mining activities that may require treatment before discharge or reuse
MP	Mining Permit
Ngākawau Facilities	The Ngākawau Rail Loadout Facility and the associated Aerial Ropeway
Oil-water separator	Infrastructure that separates hydrocarbons from water before discharge or further treatment
Oxidising substances	Substances that can intensify combustion and are regulated because of their hazardous properties.
Paraffin oil	An oil used in blasting-related processes at Stockton
pH modifiers	Chemicals used to adjust acidity or alkalinity in water treatment systems, such as caustic soda and lime slurry
Primary containment	The main storage vessel or container holding the hazardous substance
Project sub-area	Discrete geographic areas within the Project footprint representing individual mine areas or operational zones, including Stockton (including the Ngākawau Facilities), ESE, MFS, and UWHR
Quicklime	Calcium oxide used in water treatment and processing
SDS	Safety Data Sheet
Secondary containment	A backup containment system, such as bunding or double-skinned tanks, designed to capture spills or leaks from primary storage
Self-bunded	A tank with integrated secondary containment
SEMP	Site Environmental Management Plan
SEP	Stakeholder Engagement Plan
Spill kit	A set of materials and equipment used to contain and clean up spills
SSE	Site Senior Executive
Stationary tank	A fixed tank used to store hazardous substances at a particular location
Stockton	Stockton Project sub-area
Substations	Electrical infrastructure areas where transformer and insulating oils are used
Sulphuric acid	A corrosive chemical used in certain site processes, including water treatment
Sump / treatment sump	A pit or basin used to collect runoff, spills, or drainage for treatment or containment
TARP	Trigger Action Response Plan

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Term	Definition
The Project	The Buller Plateaux Continuation Project
Toolbox talks	Short operational briefings used to communicate safety, environmental, and procedural matters to site personnel
TTPP	Te Tai o Poutini Plan
UWHR	Upper Waimangaroa Haul Road Project sub-area
Water treatment chemicals	Chemicals used to improve water quality, including pH modifiers, flocculants, and metal chelating agents
WCRC	West Coast Regional Council

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1.0 Introduction

1.1 Purpose

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

This Hazardous Substances Management Plan (also referred to as the "Plan", or HSMP) outlines the objectives, risks, management controls, responsibilities, and training requirements for managing hazardous substance related effects associated with the Project.

This Plan applies to the Stockton, Mount Frederick South (MFS), Escarpment Extended (ESE), the Upper Waimangaroa Haul Road (UWHR) and the Ngākawau Facilities. Cypress is excluded from this Plan and is not subject to any requirements or obligations, as all resource consents for the Cypress area are current and a separate, up-to-date suite of management plans is maintained for that area.

This Plan has been prepared in accordance with the recommendations from the *Hazardous Substances Technical Assessment, Buller Plateaux Continuation Project,* by Tonkin & Taylor Ltd, March 2026.

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

1.2 Objectives and Scope

The objectives of this Plan are to set out controls to:

- Apply a risk-based approach to the identification, assessment, and management of hazardous substance related environmental effects;
- Avoid, remedy, or mitigate adverse environmental effects associated with hazardous substances, including effects on land and water from spills, leaks, or uncontrolled releases;
- Establish management measures for the storage, handling, transport, containment, and disposal of hazardous substances in accordance with consent conditions and relevant legislation;
- Define roles, responsibilities, and competency requirements for personnel involved in hazardous substances management;
- Provide processes for spill response, emergency management, and the management of new or modified hazardous substances; and
- Establish monitoring, inspection, auditing, and reporting processes to support ongoing compliance with this Plan.

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2.0 Project Description

2.1 Overview

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

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

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

The proposed Project consent boundary is shown in **Figure 1**.

2.2 Operations

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

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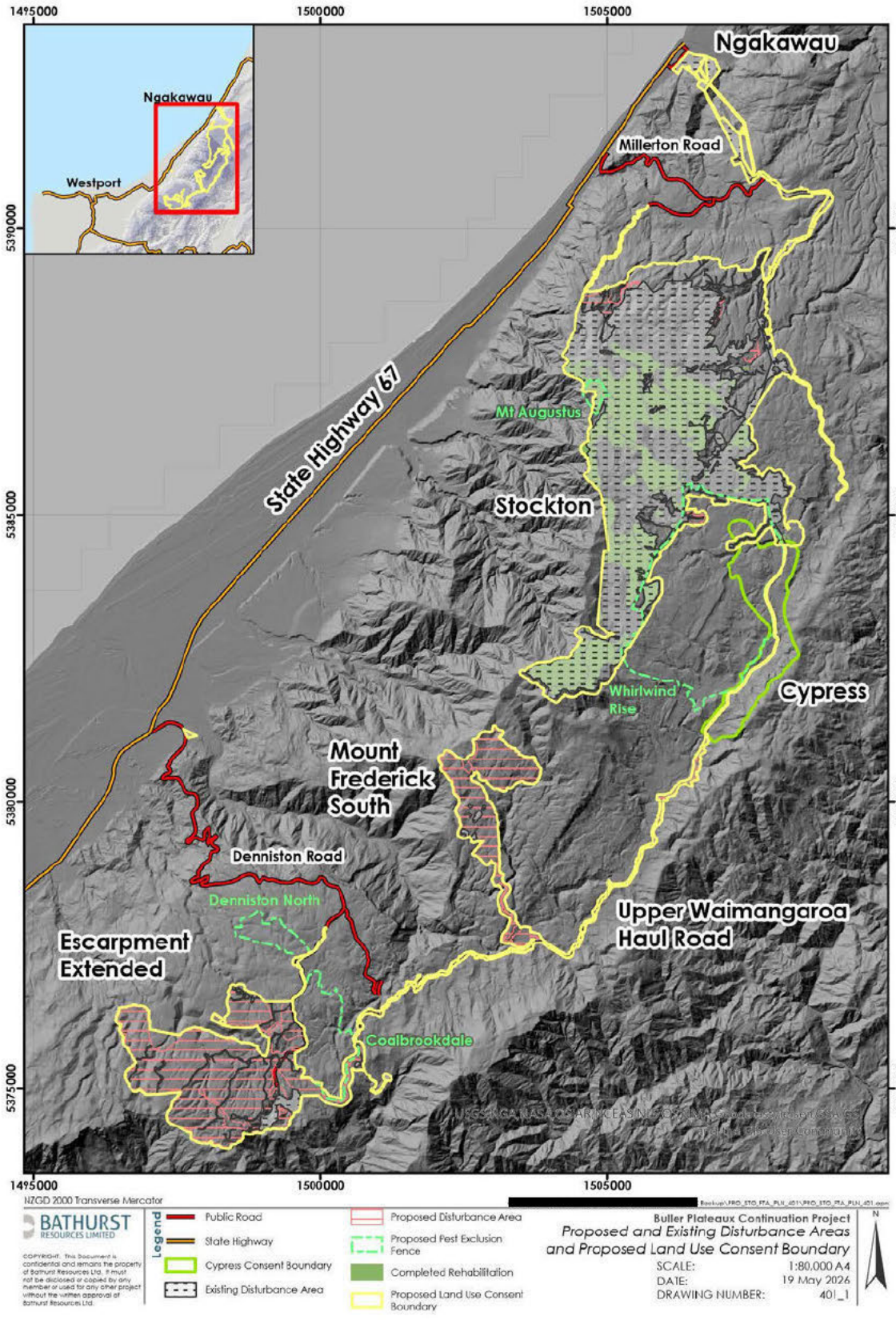

Figure 1: Proposed and Existing Disturbance Areas and Proposed Land Use Consent Boundary for the Project

2.3 Hazardous Substances

The Project involves the ongoing use, storage, handling, and transport of hazardous substances associated with existing and proposed coal mining activities across the Buller Plateaux. Hazardous substances associated with the Project are summarised in **Table 1**, including the primary substances used, stored, and handled across Project activities. **Figure 2** to **4** identify the locations of key infrastructure and facilities where hazardous substances are stored, handled, or used, including fuel storage areas, explosive magazines, water treatment plants (e.g. lime dosing plants), workshops, and substations. These locations correspond to the activity-based groupings outlined in **Table 1**.

Table 1: Hazardous Substances Associated with Project Activities

Project activity	Corresponding locations	Hazardous Substances	General Description
Blasting activities	[redacted]		Blasting is a core part of mining operations. Explosives and related materials are stored in dedicated areas and used to break rock. These materials are handled and prepared on site prior to use.
Fuel storage and refuelling	Fuel farms / refuelling areas	Diesel, petrol, diesel used for generators, and diesel associated with blasting operations	Fuel is stored and used to operate vehicles, equipment, and generators. Diesel is stored in bulk and distributed across the site, with smaller amounts of other fuels used where required. Helicopter refuelling using Jet A-1 is managed as a hazardous-substance activity associated with fuel storage and refuelling.
Plant and equipment maintenance	[redacted]		Workshops and maintenance areas use a range of substances to service and repair equipment, including oils, greases, cleaning products, and repair materials. Gases are used for activities such as welding and cutting. Batteries are used in vehicles, mobile plant, and equipment, and may contain hazardous materials such as acids and heavy metals or present fire risk if damaged. These substances are stored and handled within designated maintenance and workshop areas.
Water treatment and sediment control			Water treatment systems use chemicals to improve water quality before discharge or reuse. These include substances used to adjust pH and assist with settling and removal of contaminants.

Project activity	Corresponding locations	Hazardous Substances	General Description
Coal processing and handling	[redacted]		Coal processing uses substances to support separation and water management processes. These are used within the processing plant and associated systems.
Electrical infrastructure and utilities	Substations	Transformer oils and insulating oils (typically non-hazardous under standard classification)	Used within substations and electrical equipment for insulation and cooling. These systems are closed-loop and typically contain non-hazardous insulating oils, but a loss of containment could result in localised environmental contamination.
Emergency response	Emergency Response Training (ERT) building	Fire-fighting foam and emergency response systems	Used for fire suppression and emergency response. Stored on fire trucks, water carts, or in fixed systems.
General site operations	Gatehouses, administration buildings, bath houses, crib huts, warehouses and workshops	Packaged hazardous substances used across site, including paints, solvents, aerosols, fuels, cleaning agents and other miscellaneous products	A range of smaller quantities of hazardous substances are used across the site for general activities such as cleaning, maintenance, and repairs. These are typically packaged products used as needed.
General site maintenance and pest control	Project wide (as required)	Herbicides and rodenticides	Used for weed and pest control activities. Typically stored and handled in small quantities by contractors in accordance with relevant requirements.

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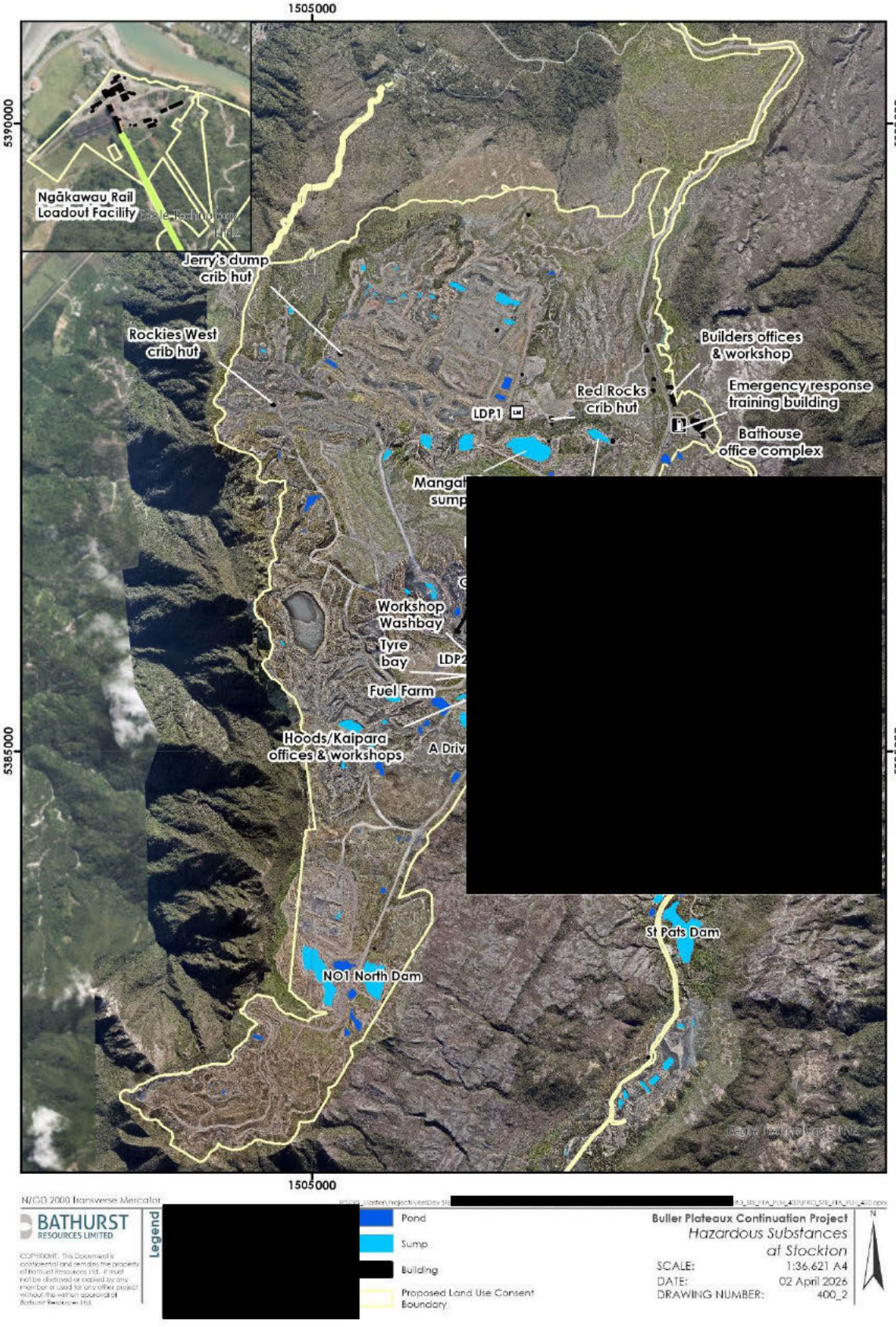

Figure 2: Locations of key infrastructure associated with hazardous substance storage and use at Stockton

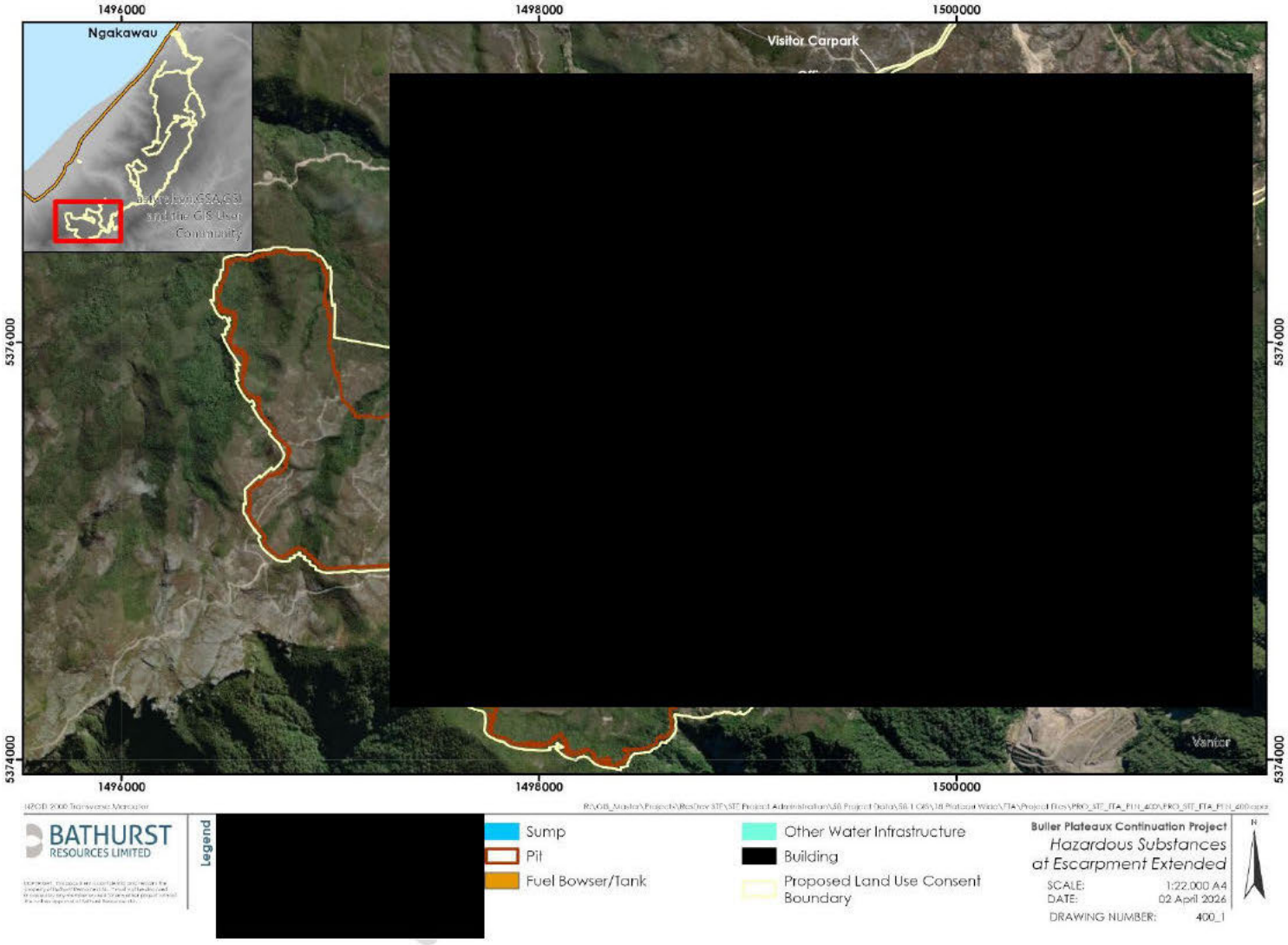

Figure 3: Locations of key infrastructure associated with hazardous substance storage and use at ESE

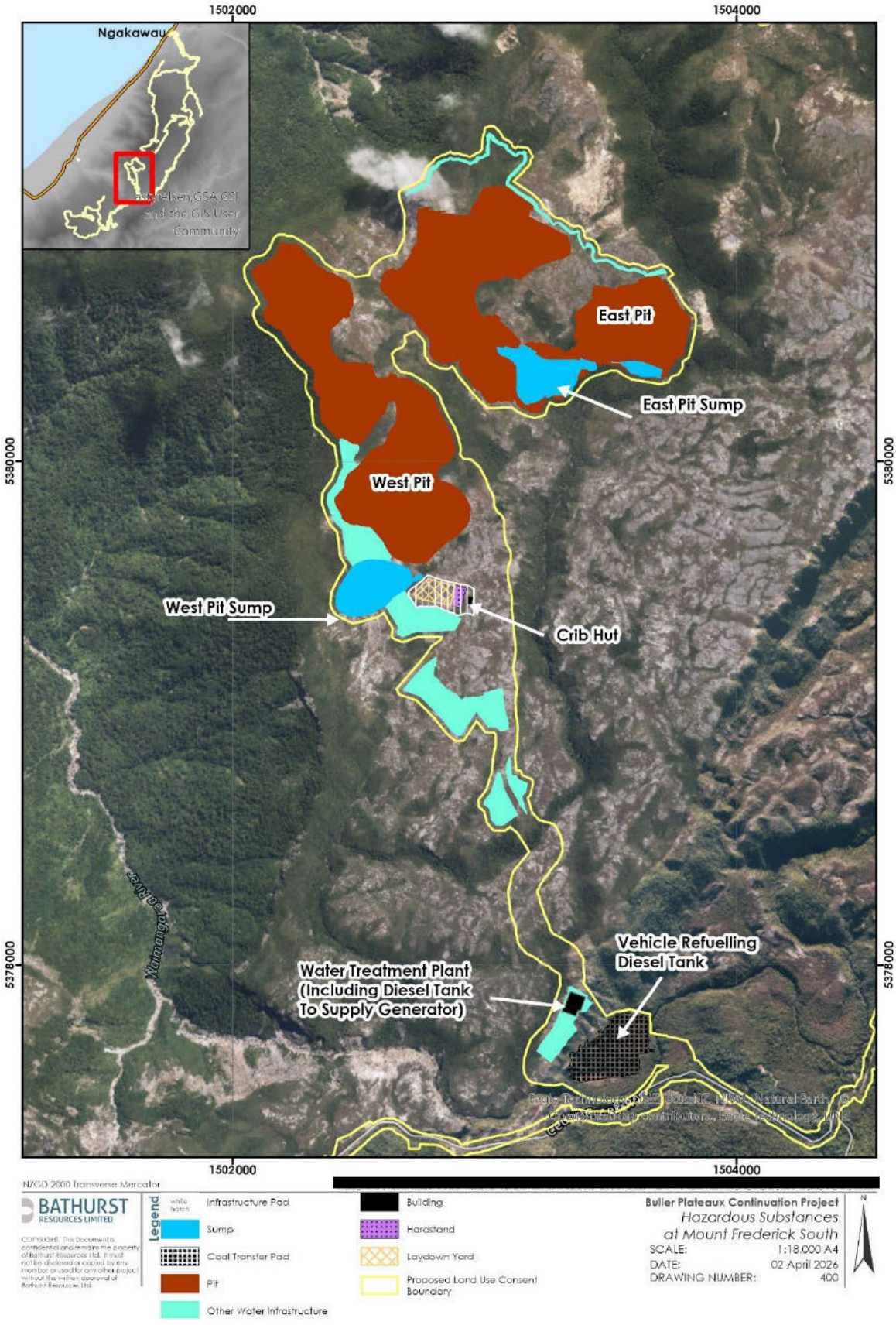

Figure 4: Locations of key infrastructure associated with hazardous substance storage and use at MFS

3.0 Environmental Setting

The Buller Plateaux has been subject to extensive historic and ongoing coal mining activities for over 130 years. At Stockton, the environment is characterised by long established mining operations, with previously disturbed land and established infrastructure where hazardous substances are routinely stored, handled, and managed. This includes maintenance workshops and service bays, fuel storage and refuelling systems, explosives storage and preparation areas, and coal handling and processing facilities. These areas incorporate established controls such as bunded storage, self-bunded tanks, and systems for managing contaminated runoff, including sediment sumps and oil-water separators. Water management infrastructure is also present, including treatment systems and sediment control structures that manage mine-affected water using treatment chemicals such as lime and flocculants. The locations of these existing activities are shown in **Figure 2** and will generally remain unchanged as part of the Project.

In contrast, parts of the Denniston Plateau are less disturbed, with more intact landforms and natural systems, and limited existing use of hazardous substances.

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4.0 Statutory Requirements

This Plan has been prepared to meet the statutory requirements for managing hazardous substance related environmental effects associated with the BPCP, to support the FTAA process.

This section identifies the relevant legislative framework, consent conditions, and applicable standards and guidelines that inform the management of hazardous substances and associated environmental effects during Project activities.

4.1 Legal Framework and Consent Requirements

Consent conditions relevant to this Plan are presented in **Table 2**.

Table 2: Consent conditions relevant to this Plan

Condition no.	Condition Description	Reference in Plan

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

4.2 Standards and Guidelines

The standards and guidelines relevant to hazardous substance management for the Project are summarised in **Table 3**. These documents reflect industry good practice that supports the management measures outlined in this Plan (see **Section 6.2**).

Table 3: Standards and guidelines relevant to this Plan

Standard/Guideline	Relevance
WorkSafe New Zealand (2017). Managing Hazardous Substances in the Workplace: A Guide for Businesses	Provides practical guidance for identifying hazardous substances, assessing risks, and implementing controls for storage, handling, labelling, and emergency management. This guidance supports the management of fuels, chemicals, and other hazardous substances used across mining, processing, and maintenance activities within the Project.
WorkSafe New Zealand. Approved Code of Practice for the Storage of Class 3.1 Flammable Liquids (HSG2)	Provides requirements and good practice for the storage and handling of flammable liquids such as diesel and petrol. Relevant to bulk fuel storage, refuelling activities, and fuel handling across the Project.
WorkSafe New Zealand. Approved Code of Practice for the Storage and Handling of Explosives *(or current WorkSafe explosives guidance, as applicable)*	Provides good practice for the storage, handling, and use of explosives. Relevant to blasting activities undertaken as part of mining operations, including management of Class 1 explosives and Class 5 oxidisers.
Environmental Protection Authority (EPA). Hazardous Substances Compliance Guide / Hazardous Property Controls Guidance (2017)	Provides guidance on applying hazardous substance controls, including containment, segregation, and environmental protection measures. Relevant to the storage and use of water treatment chemicals (e.g. lime, flocculants) and other ecotoxic or corrosive substances used on site.

Standard/Guideline	Relevance
WorkSafe New Zealand. Secondary Containment Systems for Above Ground Hazardous Substance Storage (Guidance)	Provides guidance on the design and management of bunding and secondary containment systems. Relevant to fuel storage areas, chemical storage, and containment of hazardous liquids to prevent releases to land and water.
Buller District Plan (BDP)	Includes provisions for hazardous substances storage and use, including requirements for containment, drainage to treatment systems, and preparation of management and spill response plans.
Te Tai o Poutini Plan (TTPP)	Provides objectives and policies for managing hazardous substances, focusing on minimising risks to the environment and human health and ensuring appropriate siting, design, and operation of facilities.

5.0 Stakeholder Consultation

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

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

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

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6.0 Management Approach

This section outlines the risk-based approach adopted by Bathurst to manage hazardous substance related effects associated with the Project. The approach integrates existing operational practices, consent requirements, monitoring, and management responses to minimise adverse effects and achieve compliance.

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

6.1 Sources and Effects

This Plan focuses on the management of hazardous substance related environmental effects associated with the Project, including potential effects on land, surface water, and groundwater resulting from spills, leaks, or uncontrolled releases.

The key sources of hazardous substances and their associated potential environmental effects are summarised in **Table 4**. These risks reflect the continuation and spatial extension of existing mining activities and inform the mitigation and management measures described in **Section 6.2**.

Table 4: Key risks associated with hazardous substances

Source (caused by)	Potential effect (risk)
Fuel storage and refuelling	• Contamination of land from spills or leaks; and • Contamination of surface water or groundwater from uncontrolled releases.
Storage and handling of hazardous liquids	• Localised soil contamination from spills or leaks; and • Discharge of contaminants to water from inadequate containment or drainage.
Water treatment and chemical dosing systems	• Contamination of land or water from leaks, overflows, or system failures.
Explosives storage and use	• Localised contamination of land from misfires or spills; and • Potential for contaminants to enter surrounding environments if not appropriately managed.
Transport and transfer of hazardous substances	• Spills during transport or transfer resulting in contamination of land or water.
Workshops and maintenance activities	• Contamination of land or drainage systems from spills, leaks, or poor handling practices.

6.2 Mitigation and Management Measures

Hazardous substance related environmental effects associated with the Project will be managed through a combination of design controls, operational practices, containment systems, and response procedures. The mitigation measures set out below are designed to prevent spills, leaks, and uncontrolled releases, and to minimise potential effects on land, surface water, and groundwater.

6.2.1 Storage and Containment Requirements

Hazardous substances will be stored and contained in designated areas with appropriate systems to prevent uncontrolled releases to the environment, including discharges to land and water, and in accordance with applicable legislative and regulatory requirements, including:

- The Hazardous Substances and New Organisms Act 1996 (HSNO);
- The Health and Safety at Work (Hazardous Substances) Regulations 2017;
- The Health and Safety at Work (Mining Operations and Quarrying Operations) Regulations 2016;
- The Environmental Protection Authority's Hazardous Substances (Hazardous Property Controls) Notice 2017; and
- Any other relevant legislation, standards, and requirements identified in the certified Hazardous Substances Management Plan.

Hazardous substances will be managed in accordance with applicable regulatory controls, including the segregation of incompatible substances, maintenance of appropriate separation distances, and securing of storage areas to prevent unauthorised access where required (e.g. explosives storage). Stationary container systems requiring compliance certification (e.g. bulk fuel storage tanks and diesel tank farms) will hold current compliance certifications in accordance with the Health and Safety at Work (Hazardous Substances) Regulations 2017, including maintenance of records of certification issue and expiry dates. All equipment refuelling, lubrication, and mechanical repairs will be undertaken at least 20 m from a waterbody and within an area that provides sufficient mitigation measures to ensure that no spillages into water occur

All areas where hazardous liquids are stored or used will be provided with secondary containment systems capable of containing at least 110% of the stored volume, excluding in-situ refuelling and maintenance of mobile equipment, where alternative operational controls are applied.

Where secondary containment is not practicable for existing infrastructure (e.g. existing lime slurry tanks at Stockton), alternative engineered controls will be implemented to ensure any leaks or spills are captured and directed to controlled systems, such as diversion to the on-site water treatment system, consistent with site-specific design and operational controls.

Containment systems will include the use of double-skinned tanks or bunded storage, as appropriate to the substance and storage method, and in accordance with applicable regulatory requirements.

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All new containment tanks used to store ecotoxic fuels or corrosive water treatment chemicals will be double-skinned or located within bunded areas. New sulphuric acid tanks [redacted] treatment plants will be double-skinned. Lime slurry tanks at [redacted] will be located within concrete bunded areas with capacity for at least 110% of the tank volume, noting that double-skinned tanks are not appropriate due to the exothermic nature of lime slurry preparation.

Hazardous substances will be stored in a manner that prevents adverse reactions and uncontrolled releases, including the use of appropriate storage containers and systems.

Storage areas will be designed and maintained to prevent uncontrolled discharges, including directing drainage to containment systems, sumps, or water treatment infrastructure where applicable, so that any loss of containment is captured and directed to controlled systems.

6.2.2 Handling and Use of Hazardous Substances

Hazardous substances will be handled, transferred, and used by trained and competent personnel in a manner that minimises the risk of spills, leaks, and environmental contamination.

Handling and transfer activities will be undertaken using appropriate equipment and procedures to reduce the likelihood of accidental releases. Designated handling areas will be used where practicable, particularly for higher-risk substances.

Refuelling activities will be managed using engineered and operational controls to prevent spills and minimise the risk of any discharge to land or water, including the use of automatic shut-off nozzles and overfill prevention systems. All equipment refuelling will be undertaken at least 20 m from a waterbody and within an area that provides sufficient mitigation measures to ensure that no spillages into water occur. Where practicable, refuelling areas will be designed to contain and direct spills to appropriate containment or treatment systems.

For in-situ refuelling, operators will inspect equipment, fittings and hoses after refuelling to identify leaks or faults, and will record the volume of fuel and other fluids dispensed in accordance with the Bathurst Standard Work Procedure for Servicing Mobile Plant and Equipment in the Field.

Helicopter refuelling will be undertaken in bunded helipad areas by personnel trained in emergency response procedures. Jet A-1 will not be stored overnight at helipads and any unconsumed fuel will be removed from the helipad at the end of each flying day. Helicopters undertaking refuelling activities will be equipped with spill kits appropriate to the activity.

Controls will be implemented during loading, unloading, and transfer of hazardous substances to prevent releases, including the use of appropriate containers, monitoring of transfer activities, and prompt response to any loss of containment.

6.2.3 Water Treatment Chemicals Management

Temporary water treatment systems will be established during the construction of the proposed mining areas to manage sediment runoff and associated water quality effects. These systems may

utilise treatment chemicals, including pH modifiers (e.g. lime slurry, caustic soda and magnesium oxide) noting that some treatment agents (e.g. magnesium oxide) may not be classified as hazardous but are managed to prevent environmental effects.

Water treatment chemicals will be stored, handled, and used in a manner that prevents uncontrolled releases to the environment, including discharges to land and water. During construction and operation, these substances will be stored in bunded or otherwise contained areas that drain to treatment sumps, containment ponds, or the site water treatment system. Any spills or leaks will be captured and directed to controlled systems so that discharges to land and water are avoided.

Lime slurry systems will be designed and operated to manage the exothermic reaction associated with lime mixing, including appropriate storage and containment systems that maintain structural integrity and prevent releases. Lime slurry tanks at [redacted] will be located within concrete bunded areas with capacity for at least 110% of the tank volume. Sulphuric acid tanks at [redacted] will be double-skinned.

Operational controls will be implemented to manage dosing systems, prevent overflows, and direct any releases to ensure they are contained and directed to appropriate treatment infrastructure.

6.2.4 Site-Specific Infrastructure and Controls

Specific design and operational controls will be implemented at key locations to manage hazardous substance risks and prevent environmental contamination.

At the Stockton Mine, areas surrounding the lime slurry tanks at [redacted] will be upgraded and recontoured so that any leaks or spills are diverted back into the on-site water treatment system, rather than relying solely on secondary containment structures.

At ESE, the diesel tank farm will be designed to drain to sumps fitted with oil-water separators, ensuring that hydrocarbons are removed prior to discharge into the on-site water treatment system.

Explosives storage and handling areas will be designed and operated in accordance with applicable regulatory requirements, including the use of certified storage facilities for Class 1 explosives, maintenance of appropriate separation distances, and implementation of security measures to prevent unauthorised access. Class 5 oxidising substances and blasting precursors will be stored, handled, and prepared within designated mixing and preparation areas, with controls in place to manage compatibility, prevent spills, and ensure safe handling and use.

These measures are integrated into site infrastructure and operational controls so that any loss of containment is captured and managed, including during site-based activities such as refuelling, lubrication, and mechanical servicing. All equipment refuelling, lubrication, and mechanical repairs will be undertaken at least 20 m from a waterbody and within an area that provides sufficient mitigation measures to ensure that no spillages into water occur.

6.2.5 Spill Prevention and Response

Measures will be implemented to prevent, contain, and respond to spills or leaks of hazardous substances to minimise environmental effects.

Spill kits appropriate to the types and volumes of hazardous substances present will be provided at storage, handling, and refuelling locations and maintained in a ready-to-use condition. Personnel will be trained in the use of spill response equipment and procedures.

Procedures will be in place for the immediate containment, clean-up, and disposal of spilled materials, including the recovery of contaminated soils and liquids and their classification, storage, transport, and disposal at appropriately authorised facilities in accordance with **Section 0**.

Spill response measures will be integrated with site emergency management systems and procedures, including emergency response planning, escalation protocols, and coordination with emergency services. These measures include:

- Trigger Action Response Plan (TARP), see **Section 8.0**;
- STO-HST-PRO-098 Chemical and Hydrocarbon Spill Response Procedure;
- STO-HST-PCP-002 Emergency TARP (v5.2); and
- Stockton Mine Emergency Management Principal Control Plan.

These documents define response actions, roles and responsibilities, escalation pathways, and coordination with emergency services to manage incidents and minimise environmental effects. Spill response actions will be initiated as soon as practicable following identification of a spill or loss of containment, in accordance with site procedures and emergency response requirements.

Bathurst will review and update the existing Emergency Management Principal Control Plan before commissioning relevant UWHR, MFS and ESE operations, including review and revision for site-specific ESE and MFS considerations where required. Site personnel will be trained and drills undertaken as required by the updated plan.

6.2.6 Waste Management and Disposal

Hazardous wastes will be managed and disposed of in a manner that avoids, remedies, or mitigates adverse effects on the environment and in accordance with relevant legislative and consent requirements.

Hazardous wastes may include, but are not limited to:

- Waste oils, fuels, and oil water;
- Contaminated soils and absorbent materials (e.g. from spill response);
- Chemical residues and unused hazardous substances;
- Empty or partially full hazardous substance containers;
- Workshop wastes (e.g. solvents, degreasers, paints, and cleaning agents); and

- Hazardous components associated with plant and equipment maintenance.

Hazardous waste will be:

- Segregated and stored in designated areas with appropriate containment systems (e.g. bunded areas or sealed containers) to prevent leaks, spills, and cross-contamination;
- Labelled and managed in accordance with relevant hazardous substance classifications and Safety Data Sheet (SDS) requirements;
- Handled by trained and competent personnel using appropriate equipment and procedures to minimise the risk of environmental contamination; and
- Regularly removed from site and transported by appropriately licensed contractors to facilities authorised to receive and treat or dispose of hazardous waste.

Where practicable, hazardous waste will be minimised through:

- Efficient use of hazardous substances;
- Reuse or recycling of materials (e.g. waste oil recovery); and
- Selection of less hazardous alternatives where feasible.

Any hazardous waste generated from spill response or incident clean-up, including contaminated soils or materials, will be collected, stored, and disposed of at appropriately authorised facilities.

6.2.7 Management of New or Modified Hazardous Substances

Any new hazardous substances proposed to be introduced to the Project, or changes to the type, quantity, or use of existing hazardous substances, will be subject to a review process prior to procurement and use.

This process will include:

- Identification of hazardous properties and potential environmental effects;
- Review of applicable regulatory requirements, including storage, handling, and containment controls;
- Assessment of compatibility with existing storage systems and site infrastructure;
- Review of SDS and update of the hazardous substances inventory;
- Internal review and approval in accordance with site procedures; and
- Identification of any additional mitigation or management measures required.

Where changes result in a material increase in risk or require modification to existing controls, management measures under this Plan will be reviewed and updated as necessary in accordance with the adaptive management framework (see **Section 9.0**).

6.2.8 Transport of Hazardous Substances

Hazardous substances will be transported to, from, and within the Project in a manner that minimises the risk of spills, leaks, or environmental contamination, and in accordance with applicable dangerous goods transport requirements.

Transport of hazardous substances will:

- Be undertaken by appropriately qualified and authorised personnel or contractors;
- Comply with applicable regulatory requirements for the transport of dangerous goods, including classification, packaging, labelling, and documentation requirements;
- Be carried out using suitable vehicles, containers, and packaging appropriate to the substance and volume being transported; and
- Include appropriate documentation, labelling, and segregation of incompatible substances during transport.

On-site transport and transfer activities will be managed to minimise spill risk, including the use of designated routes where practicable, appropriate handling procedures, and prompt response to any loss of containment, in accordance with site procedures and operational controls.

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6.2.9 Labelling, Signage, Certification and Records

Hazardous substances will be clearly labelled and identified in accordance with applicable classification and regulatory requirements to support safe handling, storage, and emergency response.

Storage and handling areas will include appropriate signage to:

- Identify the presence and type of hazardous substances;
- Communicate relevant hazards and precautions; and
- Support emergency response personnel in identifying risks.

Hazardous substance containers and storage systems will be labelled in accordance with SDS and relevant regulatory requirements. Signage is or will be located at the entrance to a site and at the specific building or tank in which the substances is located. The information displayed at the specific storage areas will include hazard pictograms and statements, precautionary statements (such as "Keep away from heat, hot surfaces, sparks, open flames and other ignition sources" for flammable substances) and immediate emergency response actions.

Hazardous substance storage systems requiring compliance certification (including bulk fuel storage tanks, diesel farm tanks, and other stationary containment systems used for hazardous substances) will hold current compliance certifications, confirming that systems meet applicable design, installation, and operational requirements. A register of compliance certifications (including issue and expiry dates) will be maintained for applicable hazardous substance storage systems.

A compliance certificate verifies that the design and installation meet requirements for foundation stability, secondary containment, pressure management, liquid fill level management and monitoring of the interstitial space (for double skinned tanks) to detect any leaks.

A hazardous substances inventory will be maintained by Bathurst for the Project, identifying the type, quantity, and location of substances stored and used on site. SDS will be maintained and made readily accessible at relevant locations, using site systems (e.g. ChemAlert or equivalent) where applicable.

Records of compliance certifications (including issue and expiry dates), inspections, hazardous substances inventory, and hazardous waste disposal will be maintained by Bathurst in accordance with its Environmental Management System (EMS) and regulatory requirements.

Existing fuel tanks will be inspected by a specialist contractor on a two-monthly basis, or the equivalent inspection regime will be implemented and recorded under Bathurst systems.

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7.0 Monitoring

Monitoring is undertaken to verify compliance with consent conditions, assess the effectiveness of mitigation and management measures, and provide early identification of potential hazardous substance related environmental issues. Monitoring outcomes inform operational decision-making and, where relevant, activation of the TARP.

Monitoring is implemented in accordance with applicable consent conditions (see **Section 4.1**), relevant standards (see **Section 0**), and Bathurst's established monitoring procedures.

7.1 Routine Inspections

Inspections will be undertaken across the Project to verify the implementation of hazardous substance mitigation and management measures, including the condition and performance of storage, containment, and handling systems. Inspections will also confirm the integrity and effectiveness of containment systems (including bunding and drainage controls) and identify any damage, deterioration, or conditions that may increase the risk of spills or environmental contamination.

This will include inspection of:

- Storage areas, including tanks, bunds, and storage containers;
- Refuelling, lubrication, and mechanical repair areas, including confirmation that these activities are undertaken at least 20 m from a waterbody and that appropriate spill mitigation measures are available and maintained;
- Water treatment systems and associated chemical storage areas; and
- Spill response equipment and containment systems.

Inspection findings will be documented in accordance with Bathurst's environmental management procedures. Records will include inspection outcomes, identified issues, and any corrective actions implemented to address non-compliance or minimise the risk of adverse environmental effects.

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8.0 Trigger Action Response, Incidents and Complaints Management

This Plan is supported by a TARP that provides a structured, risk-based approach for responding to hazardous substance related incidents, operational observations, and community complaints associated with the Project. The TARP supports timely identification and management of hazardous substance risks by linking observed issues to proportionate response actions and integrates with Bathurst's existing incident and complaints management systems.

Triggers for response may arise from routine inspections, operational observations, hazardous substance incidents or near-misses, community complaints, or changes in site activities or conditions.

Response actions are implemented in accordance with the trigger levels and actions set out in **Table 5**.

Table 5: Trigger Action Response Plan (TARP)

Trigger	Action
Level 1 – Observation or Minor Issue	
Isolated observations of minor issues or early indicators of control degradation (e.g. small spills contained on site, minor leaks, near-misses with no environmental impact, or minor defects in containment systems such as bund damage, reduced freeboard, or minor seepage).	• Review site conditions and operational controls; • Reinforce procedures or practices as required; • Implement minor corrective actions where necessary; • Notify relevant site personnel; and • Document findings and actions taken in safety management system (i.e. INX).
Level 2 – Minor Incident or Repeated Issue	
Repeated Level 1 triggers, substantiated complaints, or incidents resulting in limited environmental impact (e.g. contained spills requiring clean-up)	• Implement corrective actions to address the identified issue; • Undertake targeted inspections to confirm effectiveness; • Notify relevant internal personnel and, where appropriate, external stakeholders; and • Investigate and document root causes, actions and outcomes.
Level 3 – Serious Incident	
A significant hazardous substance incident resulting in actual or potential off-site environmental effects, significant contamination, fire, or any event requiring emergency response or regulatory notification.	• Activate emergency response procedures in accordance with site systems; • Contain and manage the incident to minimise environmental effects; • Notify regulators and relevant authorities as required; • Undertake a detailed investigation and review of management measures; • Modify or suspend activities as required; and • Implement additional mitigation measures prior to recommencing affected activities.

8.1 Complaints Management

Bathurst will maintain a Community Complaints Register to record all complaints relating to hazardous substance management and associated environmental effects.

Complaints will be managed in accordance with Bathurst's Complaints Management Procedure. Hazardous substance related complaints will be investigated and responded to in a timely manner.

In the event of a complaint, Bathurst will:

- Acknowledge receipt of the complaint within two (2) working days;
- Investigate the complaint and undertake a site inspection where appropriate within five (5) working days;
- Implement corrective actions where required; and
- Document investigation outcomes and communicate findings to the complainant.

Complaints will be assessed to determine whether activation of the TARP is required.

8.2 Incident Management

Hazardous substance incidents include any unplanned event involving spills, leaks, fires, unauthorised access to hazardous substances (including Class 1 explosives), or uncontrolled releases that may result in environmental effects or non-compliance with this Plan.

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

- Containment and clean-up of hazardous substances to prevent environmental contamination;
- Modification or temporary cessation of activities to manage risk;
- Implementation of corrective and preventive actions;
- Notification to regulators or relevant authorities, where required; and
- Investigation to identify root causes and prevent recurrence.

All hazardous substance incidents, including spills and fires, must be reported immediately, with an incident report completed within 24 hours.

Reporting thresholds for hazardous substance incidents are identified with reference to BDP requirements, including 20 litres to waterways or 300 litres to land. Where these thresholds are exceeded, the Environmental Manager will be notified, and external reporting requirements will be fulfilled (see **Section 10.1**).

Records of incidents, complaints, inspections, and response actions will be maintained in accordance with the Site Environmental Management Plan (SEMP) and Bathurst's incident management systems.

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9.0 Adaptive Management

Adaptive management will be applied to support the ongoing effectiveness of hazardous substance management measures achieving the requirements of the conditions over the life of the Project.

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

- Changes in construction activities or methods;
- Inspection findings or observed trends;
- Community complaints or stakeholder feedback; or
- Identified non-compliance or emerging hazardous substance risks.

Relevant outcomes will be communicated to site personnel through toolbox talks or other appropriate forums to reinforce good practice. Where required, follow-up inspections or reviews will be undertaken to confirm the effectiveness of any revised controls.

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10.0 Reporting

Reporting is undertaken to document hazardous substance management activities, monitoring outcomes, and incidents to demonstrate compliance with applicable consent conditions, and support the ongoing environmental management of potential hazardous substance effects associated with the Project.

Reporting in accordance with this Plan is proportionate to the scale and nature of monitoring undertaken and is aligned with the risk-based monitoring framework set out in **Section 7.0**.

10.1 External Reporting

External reporting will be undertaken in response to hazardous substance incidents that result in, or have the potential to result in, adverse environmental effects.

Where required, Bathurst will notify relevant regulatory authorities in accordance with applicable regulatory requirements and Bathurst's incident management procedures.

Reporting thresholds for hazardous substance incidents are identified with reference to BDP requirements. Where these thresholds are exceeded, external reporting will be undertaken as applicable (refer to **Section 8.2**).

10.2 Internal Reporting

As outlined in previous sections, hazardous substance management information, including inspection outcomes, incidents, and complaints, will be recorded and managed through Bathurst's EMS.

This information will be used to support internal reporting, management review, and continuous improvement of hazardous substance management practices.

10.2.1 Annual Work Plan

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

10.2.2 Annual Monitoring Report

Bathurst will prepare an Annual Monitoring Report in accordance with Project approval requirements. The report will summarise hazardous substance management activities, including incidents, inspection outcomes, complaints, and any identified trends or changes to management measures.

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11.0 Roles, Responsibilities, and Training

Effective implementation of this Plan relies on clearly defined roles, responsibilities, and appropriate training for all personnel involved in Project activities. Bathurst is committed to ensuring that all employees and contractors understand their responsibilities in managing hazardous substance related environmental effects and are aware of the processes for monitoring, response, and escalation.

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

11.1 Roles and Responsibilities

Key roles and responsibilities associated with this Plan are outlined in **Table 6**.

Table 6: Responsible personnel and tasks

Position	Accountable Task
Site Senior Executive (SSE) / General Manager (GM)	• Overall accountability for implementation of this Plan; • Provide adequate resources for hazardous substance management; and • Endorses significant management responses where required.
Environmental Manager	• Primarily responsible for implementation and administration of this Plan; • Coordinate inspections, incidents, complaints and reporting in accordance with this Plan; • Maintain liaison with regulatory authorities, as required; • Notify the General Manager of matters requiring review or amendment of this Plan; and • Work with the Health and Safety Manager to ensure hazardous substance management systems that appropriately manage environmental risks.
Health and Safety Manager	• Oversee hazardous substance management systems under the Health and Safety framework; • Work with the Environment Manager to maintain alignment between environmental and health and safety requirements, including training, emergency response, and hazardous substance handling; • Maintain the hazardous substances inventory and SDS register, ensuring information is current and accessible; • Oversee hazardous substance approvals prior to introduction to site; • Maintain records of compliance certifications for hazardous substance storage systems, including tracking issue and expiry dates; and • Verify personnel are trained and competent in hazardous substance handling, including where specific competencies or certifications are required.
Supervisors	• Day-to-day implementation of this Plan; • Implement hazardous substance management controls and good practice; • Identify and respond to issues, including spills or non-compliance; • Confirm hazardous substances are used, stored, and handled in accordance with approved procedures and SDS; • Maintain the integrity and availability of spill kits and other emergency response equipment; and • Report incidents and support appropriate response actions.

Position	Accountable Task
All personnel	• Comply with site procedures for hazardous substance management; • Use hazardous substances in accordance with SDS and training provided; and • Report incidents, spills, or unsafe conditions. • Participate in training and follow instructions for safe handling and storage.

11.2 Training and Inductions

Hazardous substance management requirements will be included in site inductions for all personnel involved in Project activities.

Ongoing awareness will be supported through toolbox talks and other appropriate forums, including:

- Hazardous substance management controls and good practice;
- Incident response and spill management procedures;
- Lessons learned from incidents or complaints; and
- Changes to activities, controls, or response procedures.

Personnel involved in the storage, handling, and management of hazardous substances will be appropriately trained and competent for the tasks they undertake.

Hazardous substances requiring specific competency or regulatory control will be managed by personnel holding relevant certifications, including Certified Handlers or Controlled Substance Licences, in accordance with applicable regulatory requirements.

Training records will be maintained in accordance with Bathurst's management systems.

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12.0 Document Management

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

- Following any major operational change;
- Following receipt of substantiated hazardous substance related complaints;
- Following significant incidents or non-compliance;
- Following relevant legislative changes;
- At the request of the regulator.

A copy of this Plan will be available on the project website.

12.1 Change Register

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

Reasons for changes will be documented in the document management table (see **Table 7**). Superseded versions will be retained for record purposes and marked as obsolete. Each revised version will be issued with a unique version number and date to prevent the use of outdated documents.

Table 7: Document management

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

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13.0 References

- Bathurst Resources Limited (2025). Buller Plateaux Continuation Project – Project Description (V4).
- Bathurst Resources Limited. STO-HST-PCP-002 Emergency TARP.
- Bathurst Resources Limited. STO-HST-PRO-098 Chemical and Hydrocarbon Spill Response Procedure.
- Bathurst Resources Limited. STO-TEC-PHMP-005 Explosives Principal Hazard Management Plan.
- Bathurst Resources Limited. Stockton Mine Emergency Management Principal Control Plan.
- Buller District Council (2011). Buller District Plan. Available at: https://bullerdc.govt.nz/planning/district-plan/
- Environmental Protection Authority (2017). Hazardous Substances (Hazardous Property Controls) Notice.
- Environmental Protection Authority (2017). Hazardous Substances Compliance / Hazardous Property Controls Guidance.
- Hazardous Substances and New Organisms Act 1996.
- Health and Safety at Work (Hazardous Substances) Regulations 2017.
- Health and Safety at Work (Mining Operations and Quarrying Operations) Regulations 2016.
- West Coast Regional Council (2023). Te Tai o Poutini Plan.
- WorkSafe New Zealand (2017). Managing Hazardous Substances in the Workplace: A Guide for Businesses.
- WorkSafe New Zealand. Approved Code of Practice for the Storage and Handling of Explosives.
- WorkSafe New Zealand. Approved Code of Practice for the Storage of Class 3.1 Flammable Liquids (HSG2).
- WorkSafe New Zealand. Secondary Containment Systems for Above Ground Hazardous Substance Storage.

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Attachment 1: Summary of Commitments

Commitment ID	Commitment	Section Reference

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

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