BATHURST
RESOURCES LIMITED

Waste Management Plan

Buller Plateaux Continuation Project

August 2026

BPCP-ENV-PLN-015 Rev0

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Glossary of Terms and Abbreviations

Term	Definition
ACML	Ancillary Coal Mining Licence
AEO	Authority to Enter and Operate
AWP	Annual Work Plan
Bathurst	Bathurst Resources Limited, including its subsidiary companies BT Mining Ltd, Bathurst Coal Ltd, and Buller Coal Ltd
BPCP	Buller Plateaux Continuation Project
BDC	Buller District Council
Buller Plateaux	A collective reference to the Stockton Plateau and Denniston Plateau
CML	Coal Mining Licence
DoC	Department of Conservation
EMS	Environmental Management System
ESE	Escarpment Extension (a project sub area)
FTAA	Fast-track Approvals Act 2024
GM	General Manager
HSEC	Health Safety Environment and Community
km	Kilometre
m	Metre
m^3	Cubic metres
MFS	Mount Frederick South (a project sub area)
MP	Mining Permit
NES-STO	National Environmental Standards for Storing Tyres Outdoors 2021
New Zealand Waste List (L-Code)	A national coding system that classifies waste types in New Zealand and identifies whether they are hazardous or non-hazardous.
Non-hazardous waste	Waste that does not display hazardous properties such as toxicity, flammability, or corrosivity.
Refuse	General discarded solid waste that is no longer wanted or useful, typically mixed office or municipal rubbish.
SEMP	Site Environmental Management Plan
SEP	Stakeholder Engagement Plan
SSE	Senior Site Executive
TARP	Trigger Action Response Plan
The Project	The Buller Coal Plateaux Continuation Project
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) is seeking approvals through the Fast-track Approvals Act 2024 (FTAA) for the Buller Plateaux Continuation Project (BPCP or the Project).

This Waste Management Plan (also referred to as the "Plan") sets out the objectives, risks, mitigation measures, responsibilities, monitoring, reporting and training requirements for managing waste and waste related effects arising from the development, operation and maintenance of the Project.

The Project involves continuation of mining beyond existing approvals and the spatial extension of operations into additional areas. Accordingly, this Plan documents current waste management practices and applies them consistently across the Project area, with additional measures required to address new waste generation and storage locations.

This Plan applies to non-hazardous maintenance, administrative and other ancillary wastes generated by the Project. Waste tyres are included within the scope of this Plan as a regulated non-hazardous waste stream. The quantities of tyres anticipated to be generated and stored require compliance with the Resource Management (National Environmental Standards for Storing Tyres Outdoors) Regulations 2021 (NES-STO), which is assessed in the Outdoor Tyre Storage Technical Assessment – Buller Plateaux Continuation Project (Tonkin & Taylor, December 2025). This Plan has been prepared in accordance with the recommendations of that assessment.

This Plan does not apply to overburden, coal rejects or other mined materials that are managed as part of mining, earthworks and rehabilitation activities. This Plan also does not include hazardous wastes, which are managed under the BPCP-ENV-PLN-014 Hazardous Substances Management Plan.

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 the controls to:

- Minimise waste generation and litter during all phases of the BPCP;
- Maximise reuse and recycling opportunities where practicable;
- Avoid, remedy or mitigate adverse effects associated with waste storage, handling, transport and disposal, including risks associated with outdoor tyre storage;
- Demonstrate compliance with applicable waste related consent conditions and NES-STO requirements (for tyre storage).

2.0 Project Description

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.**

2.1 Operations

The Project involves coal extraction across multiple operational areas on the Stockton and Denniston Plateaux, linked by the Upper Waimangaroa Haul Road (a Project sub-area), 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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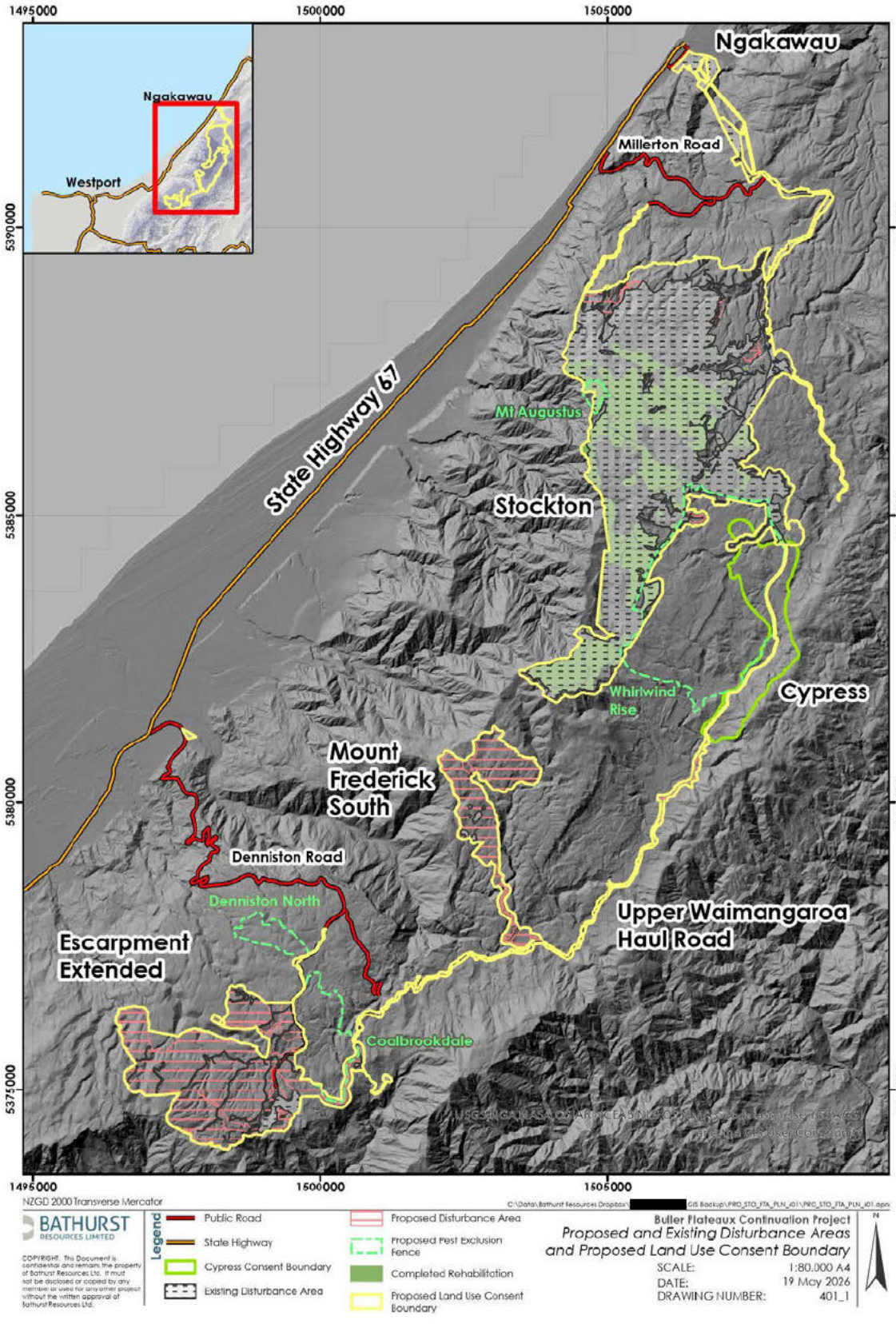

Figure 1: Proposed and Existing Disturbance Areas and Proposed Land Use Consent Boundary for the Project

2.2 Waste Generation Sources

Non-hazardous wastes are generated as part of routine mining support and infrastructure activities associated with the Project.

Primary waste generation sources and associated waste types include:

- Workshops and maintenance facilities:
  - Scrap metal components (e.g. worn parts, buckets, rollers, drilling rods);
  - Used cables, hoses and rubber products;
  - Waste oil filters and air filters (non-hazardous components);
  - General packaging materials associated with parts and consumables.
- Tyre handling, servicing and storage areas:
  - End-of-life heavy/earthmoving, medium and light vehicle tyres;
  - Damaged or unserviceable tyres awaiting assessment or disposal.
- The Ngākawau Rail Loadout Facility, offices, crib facilities and amenities:
  - General refuse (food scraps, packaging, mixed non-recyclable waste);
  - Paper and cardboard;
  - Recyclable plastics and aluminium cans.
- Plant servicing and laydown areas:
  - Pallets and timber packaging;
  - Plastic wrapping and strapping;
  - Miscellaneous non-hazardous solid materials associated with equipment delivery and servicing, e.g. worn or damaged tools.
- Supporting infrastructure associated with coal handling and haulage:
  - Minor quantities of solid maintenance waste generated during routine upkeep of infrastructure and facilities.

Non-hazardous waste generated across the Project will be segregated and temporarily stored at Stockton Limbo pad in designated waste storage areas prior to removal from site. Waste will then be transported to the Westport Transfer Station and other approved off-site facilities for recycling, treatment or disposal.

Figure 2, **Figure 3** and **Figure 4** show the locations of waste generation sources within the Project footprint, including waste tyre storage areas, for Stockton (including the Ngākawau Rail Loadout Facility), Mount Frederick South (MFS), and Escarpment Extension (ESE), respectively.

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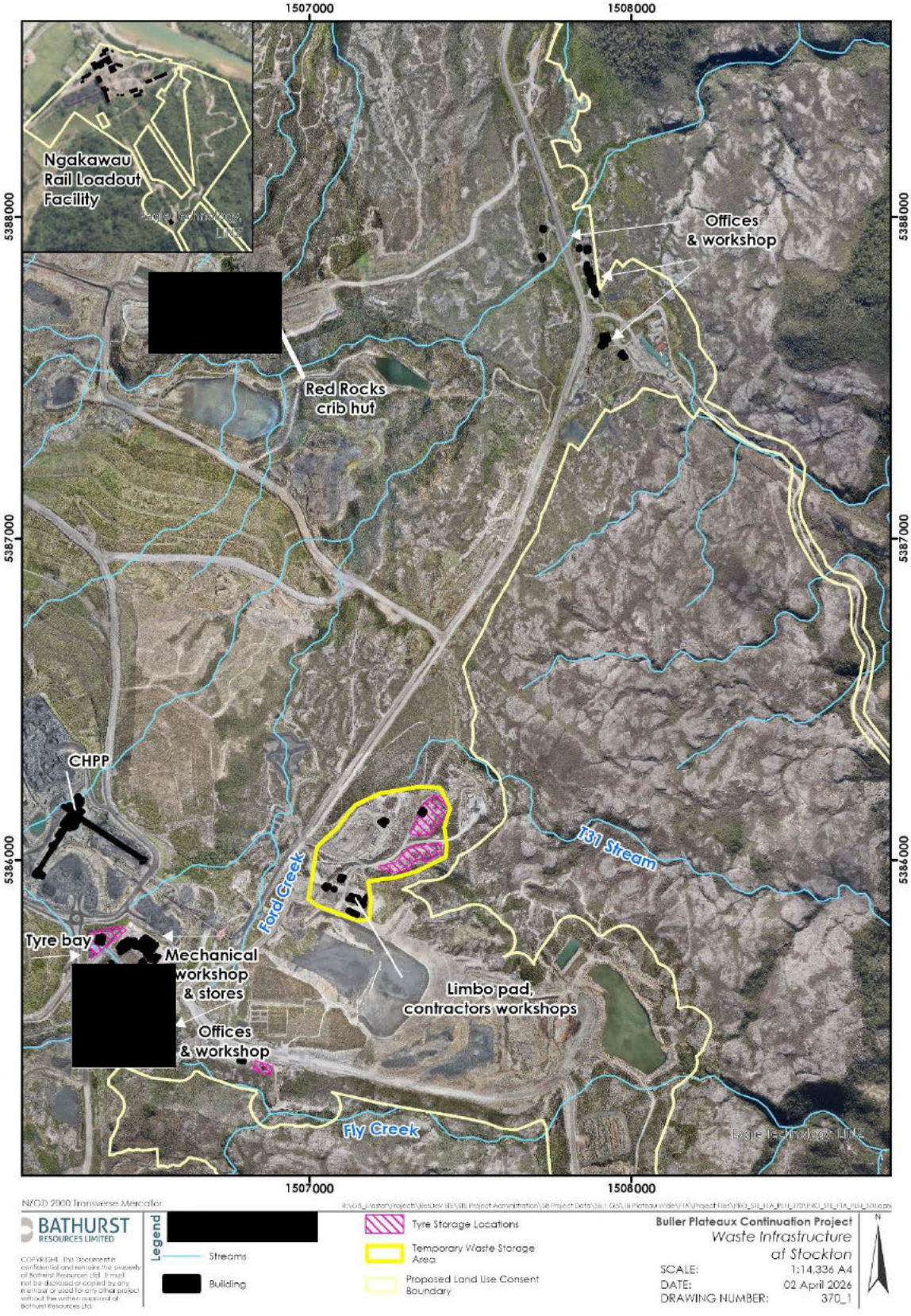

Figure 2: Stockton Waste Generation Locations and Tyre Storage Areas

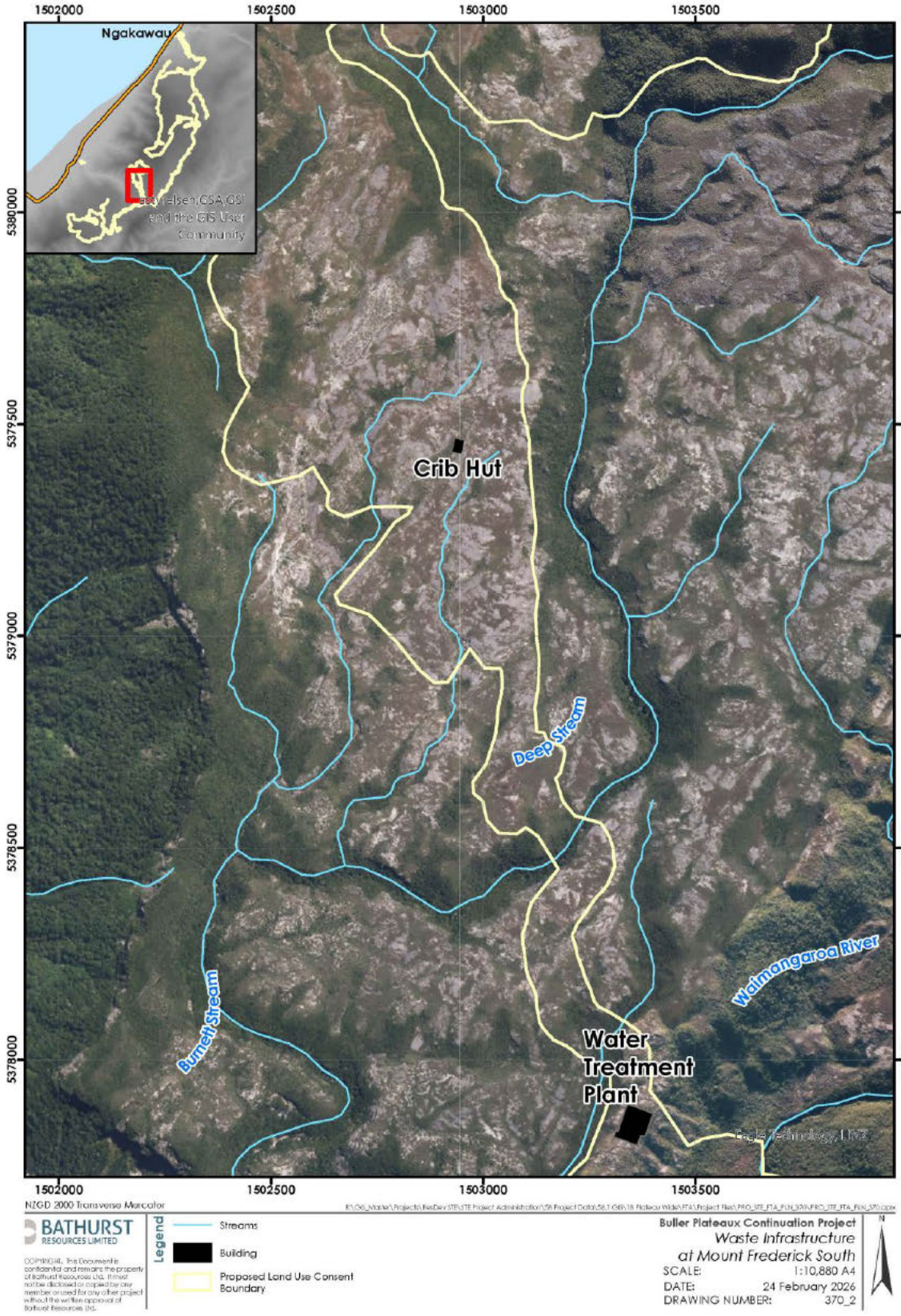

Figure 3: MFS Waste Generation Locations

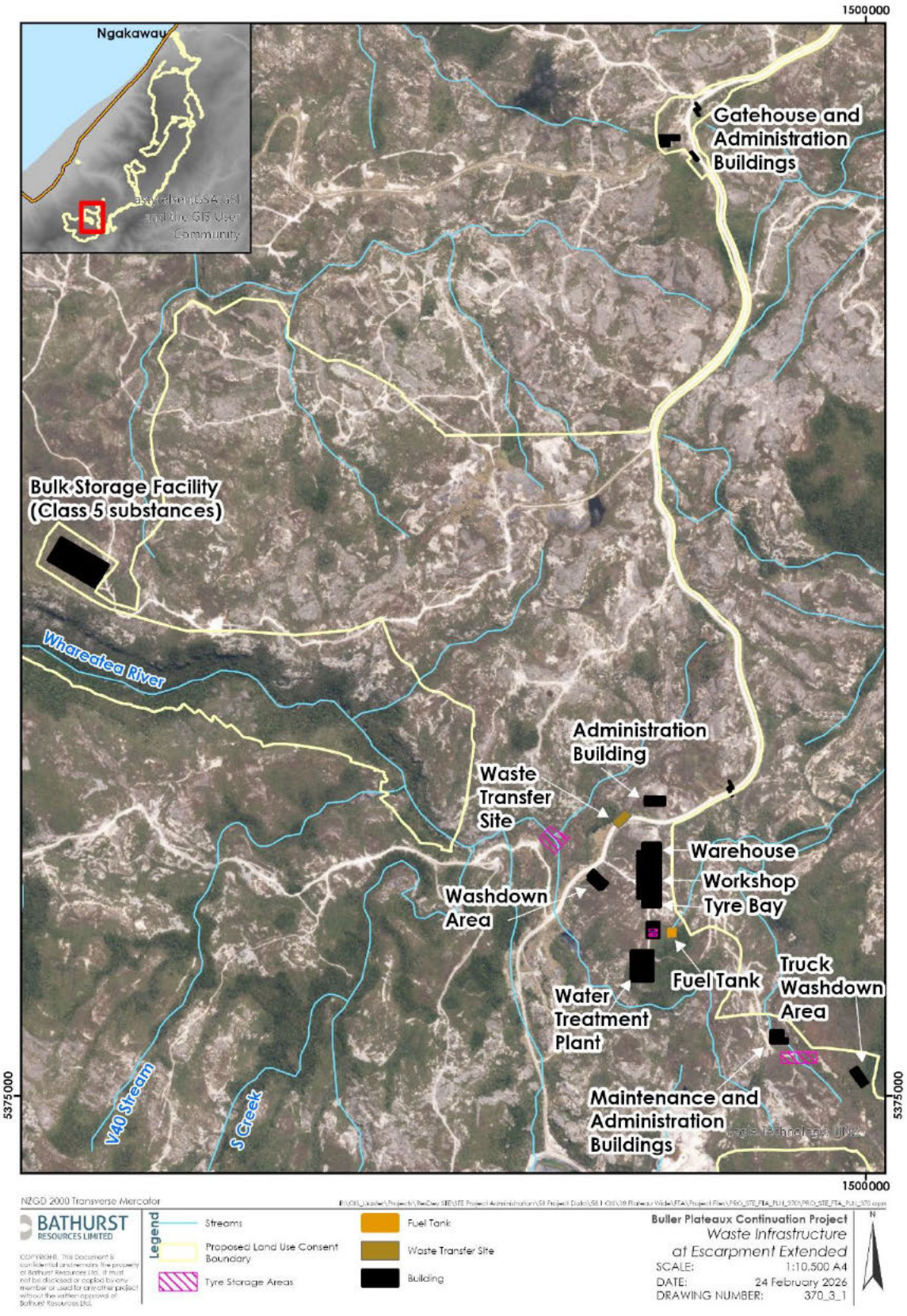

Figure 4: ESE Waste Generation Locations and Tyre Storage Areas

3.0 Statutory Requirements

This Plan has been prepared to address the statutory requirements relevant to waste effects associated with the BPCP, to support the FTAA application.

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

3.1 Legal Framework and Consent Requirements

For the purposes of this Plan, consent conditions specifically relating to waste are limited to those associated with the storage of waste tyres, which are regulated under the NES-STO and relevant resource consents.

Consent requirements relevant to this Plan are listed below in **Table 1**.

Table 1: Consent requirements relevant to this Plan

Condition no.	Condition Description	Reference in Plan

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

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3.2 Standards and Guidelines

Standards and/or guidelines relevant to this Plan are listed below in **Table 2.**

Table 2: Standards and guidelines relevant to this Plan

Standard/Guideline	Relevance
Waste and Resource Efficiency Strategy (New Zealand Government, 2025)	Presents the Government's priorities for minimising waste and improving waste management.
West Coast Regional Waste Minimisation and Management Plan (Buller, Grey and Westland District Council, 2018) (Draft)	Outlines regional objectives and approaches for efficient and effective waste management and minimisation across the West Coast region.
Waste Assessments and Waste Management and Minimisation Planning - A Guide for Territorial Authorities (NZ Ministry for the Environment, 2015)	Provides non-statutory guidance on waste management and minimisation planning principles relevant to the preparation and implementation of waste management plans.
Resource Management (National Environmental Standards for Storing Tyres Outdoors) Regulations 2021 (NES-STO)	Regulates the outdoor storage of tyres, including requirements for stockpile size and configuration, separation distances, fire risk management, access for firefighting, and runoff control. See **Section 3.2.1** for more details.

3.2.1 Key NES-STO Requirements

Key requirements of the NES-STO relevant to this Plan include:

- Outdoor tyre storage greater than 20 m^3 (cubic metres) must comply with permitted activity conditions or obtain resource consent;
- Tyre stockpiles must not exceed 3 metres (m) in height;
- Tyre storage must be set back from sensitive receptors, including water bodies, drinking water sources, and the coastal marine area (typically 20-50 m depending on receptor);
- Tyres must be stored above groundwater levels and managed to minimise contaminant discharge; and
- Non-compliance with these requirements or storage greater than 100 m^3 requires resource consent as a restricted discretionary activity.

Additional guidance (e.g. stockpile configuration, fire separation distances, and stacking methods) is provided in supporting guidance documents and is applied as good practice within this Plan.

4.0 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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5.0 Management Approach

This section outlines the risk-based approach adopted by Bathurst to manage waste 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***.

5.1 Sources and Effects

Waste generation sources associated with the Project are described in **Section 2.2**.

The potential non-hazardous waste risks arise from the generation, temporary storage and off-site removal of maintenance, administrative and ancillary wastes, including waste tyres.

Risks have been identified having regard to:

- The type and scale of waste generated;
- The location of waste storage areas within operational environments; and
- The regulatory requirements applying to specific waste streams, particularly outdoor tyre storage under the NES-STO.

The key potential risks are summarised in **Table 3.**

Table 3: Key risk associated with waste

Source (caused by)	Potential effect (risk)
General waste generation from offices, crib facilities and amenities	Litter, poor site housekeeping, attraction of pests if waste is not adequately contained or removed
Maintenance activities in workshops and servicing areas	Accumulation of non-hazardous maintenance waste leading to poor housekeeping or nuisance effects
Temporary storage of general waste prior to off-site removal	Wind-blown litter or visual nuisance if waste is not stored in designated containers
Inadequate segregation of recyclable and non-recyclable waste	Increased waste volumes requiring disposal and reduced resource recovery
Temporary storage of waste tyres	Fire risk associated with tyre stockpiling
	Potential contaminated runoff and non-compliance in the event of a fire or unmanaged storage conditions
Inappropriate layout or management of tyre storage areas	Increased fire spread risk, reduced access for firefighting response, inadequate runoff control, and potential non-compliance with stockpile or separation requirements
Delayed removal of waste tyres from site	Excessive stockpiling beyond intended storage capacity, resulting in increased fire risk and potential non-compliance

Source (caused by)	Potential effect (risk)
Failure to apply consistent waste management practices across operational areas	Increased likelihood of unmanaged waste effects

5.2 Management and Mitigation Measures

Waste effects associated with the Project will be managed through a combination of existing operational practices (including waste segregation and handling), and updated waste disposal arrangements involving the removal of waste from site by waste contractors or Bathurst personnel. These measures are supported by standard operating procedures, monitoring and response measures. The approach is designed to minimise waste generation, avoid adverse effects, and support compliance with applicable regulatory requirements.

Waste management measures are guided by the principles of the waste management hierarchy, prioritising waste avoidance, reduction, reuse and recycling before disposal. These principles are applied through a continuous improvement approach and are embedded throughout the waste management measures set out in this Plan (refer to **Figure 5**).

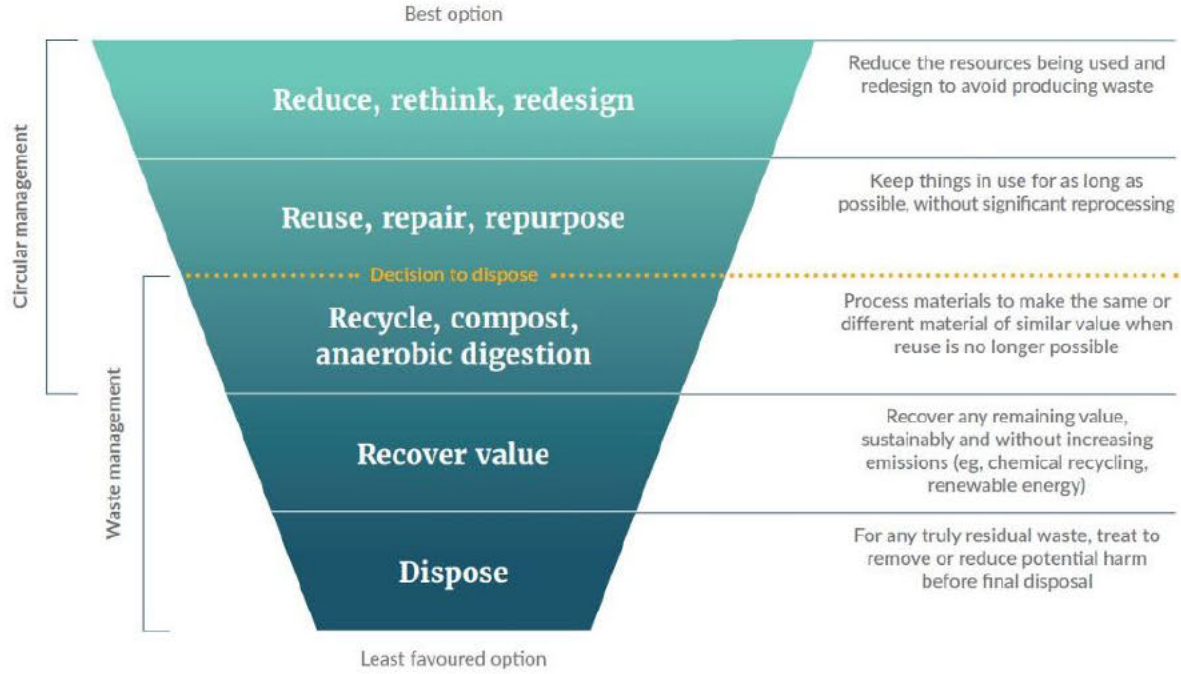

Figure 5: Waste hierarchy (source: Ministry for the Environment. 2023 Te rautaki para | Waste strategy)

5.2.1 Waste Classification

Waste classification under this Plan provides the framework for identifying, segregating, storing and removing waste streams in a consistent and practical manner across the site. Classification is used to determine the appropriate on-site storage method, segregation requirements and off-site recycling or disposal pathway for each waste stream.

Waste generated by the Project is classified in accordance with the New Zealand Waste List (L-Code), which assigns waste types based on the activity or process generating the waste (for example, offices, workshops, maintenance or plant servicing). The L-Code system distinguishes between hazardous and non-hazardous wastes and supports consistent record keeping and off-site disposal by waste contractors or approved transport arrangements.

For the purposes of this Plan, non-hazardous wastes are grouped into the following practical categories, which are reflected in on-site segregation and storage arrangements:

- **General refuse**: mixed non-hazardous wastes generated from offices, crib facilities and amenities that cannot be readily reused or recycled and are removed off site for disposal;
- **Recyclable wastes**: non-hazardous materials that can be segregated for recycling, including metals, plastics, timber, rubber products and other recoverable materials;
- **Waste tyres**: managed as a distinct non-hazardous waste stream due to the quantities generated and specific regulatory requirements for outdoor storage; and
- **Other non-hazardous solid wastes**: maintenance and operational wastes that require specific handling or recycling pathways, such as scrap metal, cables, rubber products and plastic components.

Waste classification informs:

- The segregation of waste at source using labelled bins, skips or designated laydown areas;
- The use of temporary waste storage areas;
- The selection of waste contractors for recycling or disposal; and
- Waste tracking and record keeping, including quantities removed from site.

No waste is disposed of to land on site. All waste and recyclable materials are removed off site for recycling, treatment or disposal at approved facilities.

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5.2.2 Waste management

5.2.2.1 General Refuse

General refuse will be managed in accordance with the waste management hierarchy, with an emphasis on minimising waste generation and maximising opportunities for reuse and recycling prior to disposal.

The following measures apply:

- General refuse will be segregated from recyclable and recoverable waste streams at source;
- Refuse will be placed in clearly labelled bins or skips located within designated waste storage areas;
- Refuse storage areas will be managed to prevent litter, odour and nuisance effects;
- General refuse will be removed from site regularly by waste contractors or Bathurst personnel and transported to approved off-site facilities; and
- No general refuse will be disposed of to land on site.

Figure 6 provides an example of on-site waste segregation infrastructure (e.g. labelled bins) used to support separation of waste streams for off-site removal.

Temporary waste storage or transfer areas will be used at Stockton and Escarpment Extended (ESE) to support waste segregation and removal. These facilities comprise hardstand areas with designated bunkers or bins that allow for the separation of waste streams and enable efficient loading for off-site transport.

Figure 6: Bins used for waste segregation by Bathurst.

5.2.2.2 *Non-Hazardous Solid Wastes*

Non-hazardous solid wastes are segregated by material type to prioritise reuse and recycling where practicable, with residual material removed off site for disposal.

The following measures apply:

- Non-hazardous solid wastes will be segregated at source based on material type;
- Designated bins, skips or laydown areas will be used for storage of solid waste streams;
- Reusable materials will be prioritised for reuse on site or off site where practicable;
- Solid wastes not suitable for reuse will be removed from site by waste contractors or Bathurst personnel and transported to approved facilities for recycling or disposal; and
- No non-hazardous solid waste will be disposed of to land on site.

5.2.2.3 *Waste Tyres*

Waste tyres are managed as a regulated non-hazardous waste stream due to the quantities anticipated to be generated and stored over the life of the Project.

The following measures apply:

- Waste tyres will only be stored outdoor within designated tyre storage areas.
- Outdoor tyre storage will be undertaken in accordance with the relevant approved management plans and procedures, which include:
    - Bathurst, May 2025, Stockton Mine Operational Waste Management Procedure (STO-ENV-PRO-028); and
    - Bathurst, Jan 2025, Stockton Mine Disposal and Storage of Heavy/Earthmoving, Medium and Light Vehicle Tyres Procedure (STO-ENV-PRO-040).
- Tyre storage areas will be located and maintained so they are accessible for firefighting vehicles and machinery, with adequate firefighting water and/or foam available on site at all times;
- Adequate tyre-fire firefighting response material will be provided including water carts.
- All runoff from outdoor tyre storage areas (including firefighting runoff) will be captured and directed to the mine water treatment system, with storage areas located on low-permeability surfaces to minimise infiltration;
- No outdoor tyre stockpile will exceed 20 metres in length, 6 metres in width and 3 metres in height;
- Tyre stockpiles will be configured in accordance with NES-STO guidance (e.g. tyres either barrelled or laced to reduce air gaps).
- Heavy/Earthmoving Vehicle Tyres stored outdoors will be stacked no more than three tyres high (approximately 2 metres high) to reduce the risk of falling tyres;

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- Outdoor tyre storage areas will be separated by at least 20 metres from any other tyre storage area, any other waste storage area, any buildings or infrastructure, and any dense vegetation;
- Waste tyres will be tracked, managed and removed from site in accordance with established procedures and contractor arrangements;
- End-of-life tyres will be removed from site through the Tyrewise product stewardship scheme and/or other approved recycling options. Legacy tyres not covered by the Tyrewise scheme will be managed through alternative approved disposal or recovery pathways, as required;
- Where practicable, waste tyres may be reused on site for operational purposes (e.g. safety markers, bunding or traffic delineation), provided they are in active use and not accumulated or stored in a manner that would trigger NES-STO requirements;
- Additional fire risk mitigation measures may be implemented, where practicable, consistent with industry good practice. This will include locating tyre storage areas away from potential ignition sources (such as fuel storage or hazardous substances), and maintaining clear separation from surrounding infrastructure; and
- A Trigger Action Response Plan (TARP) (see **Section 7.0**) will be implemented to respond to indicators of increased risk or potential non-compliance.

5.3 Waste Disposal Facilities

Waste and recyclable materials generated by the Project will be removed off site for recycling, treatment or disposal at approved facilities by waste contractors or Bathurst personnel.

Off-site disposal and recovery facilities include regional landfills, transfer stations and recycling facilities operated by local authorities or licensed providers. Facilities used will be determined by the waste type and contractor arrangements in place at the time of removal.

No waste disposal facilities are located within the Project area, and no waste will be disposed of to land on site.

5.4 Waste Contractors

Waste contractors will be engaged for the collection, transport and processing of non-hazardous waste generated by the Project. Bathurst personnel may also transport non-hazardous waste directly to approved facilities in accordance with site procedures.

The following measures apply:

- Contractor performance will be monitored to confirm compliance with applicable requirements;
- Waste tracking records and disposal documentation will be retained to support compliance monitoring and reporting;

- Waste storage areas will be maintained to enable safe and efficient collection; and
- Waste management arrangements may be reviewed and refined over time to improve operational efficiency, including consideration of alternative infrastructure or service delivery models.

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6.0 Monitoring

Waste management measures will be monitored by means of inspections and audits including investigation of complaints and assessment of the effectiveness of mitigation measures.

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

Waste monitoring under this Plan is implemented in accordance with applicable consent conditions (see **Section 3.1**), relevant standards (see **Section3.2**), and Bathurst's established monitoring procedures.

6.1 Routine Inspections

Routine waste inspections will be undertaken monthly within operational and infrastructure areas, in accordance with Bathurst's environmental inspection processes.

Additional inspections or targeted monitoring may be undertaken where:

- A substantiated waste-related complaint is received;
- A material change to waste generation, storage, handling or disposal occurs;
- Monitoring is required to confirm compliance with consented limits or NES-STO requirements (including tyre storage); or
- Non-compliance or emerging risk is identified through routine inspections or audits.

Inspections will include, as relevant:

- General housekeeping – presence of litter, wind-blown waste or nuisance conditions;
- Waste segregation – correct use of labelled bins, skips and laydown areas and absence of cross-contamination;
- Storage adequacy – suitability and capacity of waste storage areas and frequency of removal;
- Tyre storage – compliance with approved storage areas and layouts, including:
    - access for firefighting vehicles and machinery;
    - availability of firefighting water and/or foam;
    - stockpile height and footprint;
    - separation distances;
    - condition of storage surfaces; and
    - runoff containment and drainage.

Inspection findings and corrective actions will be recorded, assigned and tracked through Bathurst's site systems. Toolbox talks may be used to communicate outcomes and reinforce good practice.

6.2 Waste Audits

A waste audit will be undertaken annually to:

- Identify major waste streams and sources;
- Estimate quantities generated, reused, recycled and disposed;
- Review effectiveness of segregation and storage practices; and
- Identify opportunities for improvement or additional training.

Audit findings will be used to inform updates to this Plan and to benchmark waste management performance over time.

6.3 Waste Tracking and Record Keeping

Bathurst will maintain a Waste Register to support tracking, reporting and continuous improvement, proportionate to the scale and nature of waste generated.

Records will include:

- Waste type and classification;
- Estimated quantities removed from site (where practicable);
- Transport details, where relevant; and
- Disposal or recycling destination;

Waste receipts and contractor documentation will be reviewed periodically to confirm compliance with applicable regulatory requirements and this Plan.

Waste data will be reviewed annually in conjunction with waste audits to assess alignment with the waste management hierarchy and identify opportunities to reduce, reuse or recycle waste.

The level of detail recorded will be aligned with operational requirements and available information, to ensure effective management without unnecessary administrative burden.

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7.0 Trigger Action Response, Incidents and Complaints Management

This Plan is supported by a TARP that provides a structured, risk-based approach for responding to waste related incidents, operational observations, and community complaints associated with the Project. The TARP supports timely identification and management of waste 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 or operational observations, waste related incidents or near-misses, or community complaints.

Response actions are implemented in accordance with the trigger levels and actions set out in **Table 4.**

Table 4: Trigger Action Response Plan (TARP)

Trigger	Action
Level 1 - Observation or Minor Issue	
Minor waste management issues identified during routine inspections, audits or monitoring (e.g. minor housekeeping issues, incorrect bin use, low-level waste accumulation), or isolated, non-substantiated complaints with no material environmental effect.	• Review waste management practices and housekeeping controls in the affected area; • Reinforce waste segregation, storage and handling requirements with relevant personnel, where required; • Implement minor corrective actions (e.g. relabelling bins, relocating waste to designated areas, arranging additional waste removal); and • Record the issue and actions taken.
Level 2 – Repeated Issue or Substantiated Complaint	
Repeated Level 1 triggers or substantiated complaints indicating ineffective waste management practices (e.g. recurring poor segregation, excessive accumulation of waste, tyre storage approaching capacity or not aligned with approved layouts).	• Implement corrective actions to address the identified issue (e.g. increased waste removal frequency, changes to storage configuration, improved segregation controls); • Undertake targeted inspections or audits to confirm effectiveness of corrective actions; • Notify relevant internal management and, where appropriate, affected stakeholders; and • Investigate and document root causes, actions and outcomes.
Level 3 – Significant Waste Management Incident	
A significant waste related incident, including a tyre fire, uncontrolled release of waste, material non-compliance with consent or NES-STO requirements, or an event requiring regulatory notification.	• Undertake a detailed investigation and review of waste management controls and procedures; • Modify or suspend relevant activities where required to prevent further risk; • Implement incident or emergency response procedures in accordance with site systems; • Notify regulators and relevant authorities as required; and • Document outcomes and implement additional mitigation measures before activities recommence, where appropriate.

7.1 Complaints Management

Bathurst will maintain a Community Complaints Register to record all complaints relating to waste.

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 non-compliance or poor practice is identified; and
- Document investigation outcomes and communicate findings to the complainant.

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

7.2 Incident Management

Waste related incidents include situations where inspections, operational observations or complaints identify an unplanned event, safety risk, or potential non-compliance with this Plan.

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

- Modification or temporary cessation of relevant activities;
- Implementation of corrective and preventive actions;
- Notification to regulators or other relevant authorities, where applicable; and
- Internal investigation to identify root causes and prevent recurrence.

Records of waste related incidents, complaints, inspections, and response actions will be maintained in accordance with the Site Environmental Management Plan (SEMP).

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8.0 Adaptive Management

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

Information from routine inspections, monitoring, audits, complaints and incident responses will be reviewed by the Environmental Manager to confirm compliance with this Plan and applicable consent conditions, assess the effectiveness of controls, and identify trends or emerging risks. Where required, waste management measures may be refined in response to operational changes, monitoring outcomes, stakeholder feedback or identified non-compliance.

Monitoring outcomes and any changes to controls will be communicated to site personnel through toolbox talks or other appropriate forums. Additional inspections may be undertaken to verify the effectiveness of revised measures. This process supports continuous improvement in waste management performance across the Project.

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9.0 Reporting

9.1 Internal Reporting

Non-hazardous waste monitoring outcomes will be compiled and reported to internal management on a 12-monthly basis within the Environmental Management System (EMS) Management Review Process. The Environmental Manager will be responsible for scheduling this review and presenting performance against the Plans objectives (as outlined in **Section 1.2**).

Non-hazardous waste related community complaints will be recorded in the Community Complaints Register and managed in accordance with the Community Complaints Procedure.

9.2 External Reporting

Non-hazardous waste related monitoring information will be provided to the relevant regulatory authorities where required by consent conditions or upon request, and in response to incidents or complaints where reporting is appropriate.

9.2.1 Annual Work Plan (AWP)

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

9.2.2 Annual Monitoring Report

Bathurst will prepare and submit an Annual Monitoring Report in accordance with AWP requirements and applicable approval conditions. The reporting period will typically cover a 12 month period, generally from April to March, unless otherwise agreed. Initially this may be for a different period depending on the commencement date.

As appropriate, non-hazardous waste management activities, incidents, complaints, and monitoring outcomes will be documented in the Annual Monitoring Report. This will include a summary of compliance with outdoor tyre storage requirements.

At the time of submission, Bathurst will also advise of any material changes proposed to non-hazardous waste management arrangements and the anticipated timeframe for implementation of those changes.

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10.0 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 waste 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.

10.1 Roles and Responsibilities

Key roles and responsibilities associated with this Plan are outlined in **Table 5**.

Table 5: Responsible personnel and tasks

Position	Accountable Task
Site Senior Executive (SSE) / General Manager (GM)	• Overall accountability for implementation of this Plan; • Allocating adequate resources to support implementation of this Plan; • See that waste generation is considered in procurement of new materials, infrastructure, and assets; • Endorses significant management responses where required; and • Clearly communicate waste responsibilities in all contracts with suppliers.
Environmental Manager	• Primarily responsible for implementation and administration of this Plan; • Maintaining records of the quantities, types and source/destination of waste removed from the site (including waste receipts and contractor documentation); • Actively promoting the waste management hierarchy to all site personnel; • Coordinate waste inspections and investigations, where required; • Manage waste related incidents, complaints and corrective actions; • Coordinate internal and external reporting obligations under this Plan; • Maintain liaison with regulatory authorities as required; • Monitor for updates to the NES-STO; • Overseeing the periodic review of this Plan; and • Notify the General Manager of matters requiring review or amendment of this Plan.
Health and Safety Manager	• Support site implementation of waste related safety requirements, including safe storage practices and emergency response readiness for tyre storage areas (as applicable).
Training Supervisor	• Coordinate training for employees and contractors on waste management responsibilities and procedures under this Plan.

Position	Accountable Task
Supervisors	• Responsible for day-to-day operations being undertaken in accordance with the mitigation and management measures set out in this Plan; • Manage waste contractors on site to ensure waste handling, storage and removal activities are undertaken in accordance with this Plan and site procedures; • Identify and respond to operational activities that may increase waste effects; • Monitor the effectiveness of waste management measures and report issues as required; and • Implement corrective actions as directed.
All personnel	• Comply with site procedures and controls relevant to waste management; • Report any waste related issues, complaints, or incidents to their supervisor; and • Participate in inductions and toolbox talks relevant to the requirements of this Plan.

10.2 Training and Inductions

Waste management requirements will be included in the Mine Induction Package and induction process for all personnel.

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

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

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

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11.0 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 complaints related to waste;
- Following significant incidents or non-compliance;
- Following relevant legislative changes;
- At the request of the regulator.

11.1 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 6**). 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 6: Document management

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

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12.0 References

- *Bathurst Resources Limited (2025). Buller Coal Plateaux Continuation Project – Project Description (Draft V4)*
- *Ministry for the Environment. 2023. Te rautaki para | Waste strategy. Wellington: Ministry for the Environment. https://environment.govt.nz/news/waste-strategy/*
- *Tonkin & Taylor. (2025). Outdoor Tyre Storage Technical Assessment – Buller Plateaux Continuation Project. Prepared for Bathurst Resources Limited.*
- *Westland District Council, Grey District Council, & Buller District Council. (2024). Draft West Coast Regional Waste Management and Minimisation Plan 2024–2030. https://www.westlanddc.govt.nz/media/zs1fixot/draft-west-coast-regional-waste-management-and-minimisation-plan.pdf*

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Attachment 1: Summary of Commitments

Commitment ID	Commitment	Section Reference

Summary of commitments and conditions to be inserted upon issue of final decision.

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