EXECUTIVE SUMMARY

The Buller Plateaux Continuation Project ("**BPCP**" or "**Project**") is a listed project for the purposes of the Fast-track Approvals Act 2024 ("**FTAA**") which is directed toward facilitating infrastructure and development projects that provide significant regional and national benefits. Bathurst Resources Limited, together with the relevant companies within the Bathurst group (**"Bathurst**"), seeks the approvals necessary to continue the existing Stockton mining operation, access replacement coal resources on the Stockton and Denniston Plateaux (together referred to as the "**Buller Plateaux**"), construct and operate associated infrastructure, and implement the environmental management, rehabilitation, closure and residual effects measures described in this application.

The Buller Plateaux has a long history of coal mining, and the Project is not an unconstrained new mining proposal. It is an integrated continuation project, developed in response to the depletion of available blending coal at Stockton and the expiry of key existing mining authorisations on 31 March 2027. It would enable continued use of established Stockton processing, water management and transport infrastructure, while providing staged access to additional coal resources at Escarpment Extended and Mount Frederick South and establishing the Upper Waimangaroa Haul Road to connect those resources with existing infrastructure at Stockton.

Project Overview

The BPCP comprises five interrelated Sub-Areas:

- Stockton, including the continued operation and re-authorisation of the existing mine, processing facilities, water-management systems, aerial ropeway and Ngākawau rail loadout.
- Escarpment Extended, comprising the existing Escarpment Mine area and staged opencast mining into adjacent resources on the Denniston Plateau (and includes the Waimangaroa Storage Yard).
- Mount Frederick South, a new opencast mining area on the southern Stockton Plateau.
- The Upper Waimangaroa Haul Road, providing a private connection between Escarpment Extended, Mount Frederick South and Stockton
- Cypress, which would continue operating under its existing mining approvals, with focused variations sought to existing consent conditions and renewed wildlife authorisations to better enable the achievement of Cypress's biodiversity objectives and obligations, while also aligning those requirements with the broader biodiversity management, restoration and residual effects package proposed as part of the wider Project.

The Project is expected to produce approximately 20 million tonnes of product coal over an operational period of approximately 20 years. Rehabilitation, monitoring and active or passive water treatment would continue beyond the cessation of active mining. Subject to the necessary approvals being granted, Bathurst proposes to commence activities in the second quarter of 2027.

The Sub-Areas are functionally and operationally interdependent. The coal resources available across the Buller Plateaux have different qualities, and the Project relies on blending coal from different areas to meet international metallurgical-coal specifications. Using the existing Stockton coal handling and processing plant, aerial ropeway, Ngākawau rail loadout, and rail/port logistics avoids duplicating major infrastructure elsewhere and materially informs the Project's location and configuration.

Project Need and Benefits

The Project is required because the available Stockton blending resources are being depleted and the existing Stockton coal-mining licences expire on 31 March 2027. Without replacement approvals and access to additional resources, continued production would become operationally and economically unsustainable. The Project provides the only practicable pathway currently available to maintain the existing Stockton operation, maintain use of established processing and logistics infrastructure, and support a managed transition for Buller and the wider West Coast rather than an abrupt cessation of mining activity in 2027.

The Project would deliver significant national and regional benefits. The quantified national economic benefit over the mining phase is estimated at approximately $661 million to $957 million, compared with approximately $72 million to $73 million under the base case where mining ceases when existing approvals expire. Anticipated Crown revenue includes approximately $225 million to $328 million in corporate tax, $21 million to $32 million in royalties, together with licence fees, rates and other government revenues. The Economic Assessment undertaken by AEGIS Group and peer review by Market Economics both conclude that the Project generates substantial additional economic benefits at both national and regional scales and can reasonably be regarded as economically significant within the FTAA framework. These benefits are directly relevant to the purpose of the FTAA, which is directed toward facilitating infrastructure and development projects that deliver significant regional and national benefits.

The Project would sustain around 350–400 direct and contractor jobs, support local contractors and suppliers, maintain household incomes and expenditure across the Buller District, and continue to underpin the viability of regional infrastructure and services. Bathurst is one of the largest private-sector employers in Buller and the West Coast, with the majority of its workforce residing locally. The continuation of mining would avoid a significant near-term

economic contraction, help retain working-age population, skills and investment in the region, and provide communities and government with additional time to plan and implement long-term economic transition arrangements.

The Project also has national strategic significance. Stockton is New Zealand's largest opencast coal mine and a major producer of metallurgical coal, which MBIE identifies as a critical mineral. The Project would sustain exports, support New Zealand's international trade relationships and maintain an important contribution to the national mining sector and export economy.

The Project's significance also derives from the exceptional quality of the Buller Plateaux coal resource. These coals are internationally recognised for their high vitrinite content, low ash and very low phosphorus characteristics, which make them highly valued by steel manufacturers and support the production of strong, high-quality metallurgical coke. These qualities improve blast furnace efficiency, reduce slag generation and lower the quantity of coal required to produce each tonne of steel. As a result, Buller Plateaux coal attracts sustained international demand and plays an important role in efficient steel production.

Steel produced using metallurgical coal remains essential to modern economies and to the infrastructure required for the global energy transition. Steel is a fundamental component of wind turbines, solar energy systems, electricity transmission networks, transport infrastructure, buildings and manufacturing. While technologies such as electric arc furnaces, hydrogen-based steelmaking and other lower-emissions steelmaking pathways are developing, global demand for primary steel is expected to remain substantial for decades, particularly in developing economies where demand cannot be met solely through recycled steel. The Project would therefore support the continued supply of a premium metallurgical coal resource that contributes to the production of steel required for both economic development and renewable-energy infrastructure worldwide.

Importantly, the unique properties of Stockton coal can also contribute to lower emissions intensity in conventional steelmaking. Independent analysis has found that its high vitrinite and low ash characteristics improve coke strength, reduce fuel consumption and lower blast furnace emissions relative to alternative coking coal sources. Verified assessments indicate that existing Stockton coal products can support annual emissions reductions for steelmakers through improved furnace efficiency and reduced coal consumption, providing measurable environmental benefits during the transition toward lower-carbon steel production technologies.

Beyond its economic contribution, the Project would retain the established operator presence at Stockton, including the infrastructure, workforce, equipment, institutional knowledge and technical capability currently used to manage legacy acid mine drainage ("**AMD**"). That

capability is not incidental to the mining operation; it is central to the ongoing management of a significant legacy environmental issue caused by historic Crown mining on the Buller Plateaux. Continued operation would keep the people and systems that understand the site's complex hydrology, historic workings, treatment infrastructure and operational constraints in place, rather than requiring those responsibilities to be transferred abruptly to the Crown or a replacement provider when current approvals expire. It would also preserve the ability to integrate AMD capture, treatment, rehabilitation and closure works with active mining and landform development. In selected areas, mining and associated works would remove, isolate or intercept historic underground workings and unmanaged drainage pathways, with expected water-quality improvements in parts of the Project area.

The Project would also continue progressive rehabilitation, support ongoing landscape-scale biodiversity restoration and pest-control initiatives.

Application and Assessment Approach

The substantive application has been prepared as a single integrated package because the mining areas, haul road, coal processing and logistics infrastructure, water-management systems, rehabilitation obligations, closure arrangements and residual effects measures are functionally connected.

The application seeks the approvals required under the legislation incorporated into the FTAA process, including approvals under the Resource Management Act 1991 (**"RMA"**), Crown Minerals Act 1991, Conservation Act 1987, Wildlife Act 1953, Fisheries Act 1996 and Heritage New Zealand Pouhere Taonga Act 2014 **("HNZPA**").

The approvals package has two central functions. First, it replaces and updates the key Stockton authorisations that expire on 31 March 2027, avoiding a regulatory cliff-edge for the existing operation, including processing, water management, rail loadout, aerial ropeway, rehabilitation, closure and ongoing management of legacy AMD. Secondly, it authorises the additional resources, infrastructure and management measures required for the wider Buller Plateaux Continuation Project.

At a high level, the application seeks the approvals necessary to construct, operate, maintain, rehabilitate, close and monitor the Project, and to implement the associated environmental management, residual effects and compensation measures across the Project area.

The RMA approvals package includes land-use consents, regional water permits, discharge permits and air discharge permits for existing and future mining areas and associated ancillary activities. For Stockton, those approvals are critical because the existing land-use authorisations under the Coal Mining Licence and Ancillary Coal Mining Licences expire on 31 March 2027, and a number of associated regional consents for water management and

discharges expire from around the same period. The FTAA approvals package therefore provides the mechanism for continuity of lawful operations and environmental management at Stockton, while also authorising future mining areas, the Upper Waimangaroa Haul Road and associated Project infrastructure. The RMA approvals are sought under the relevant district and regional planning instruments and applicable national environmental standards.

The RMA approvals sought for the Project, together with the wider approvals package, sit within the FTAA framework, under which the Panel must give greatest weight to the purpose of facilitating infrastructure and development projects with significant regional or national benefits. The relevant planning instruments remain important matters for assessment, but identified tensions with particular policy directions are not determinative when considered alongside the Project's benefits, its location-specific and operational requirements, and the enforceable mitigation, rehabilitation, compensation, monitoring and adaptive management measures proposed. For RMA purposes, the assessment is not advanced on the basis that all adverse effects are avoided or fully counterbalanced. Rather, it recognises that residual effects will remain, particularly for indigenous biodiversity, wetlands, freshwater habitat, landscape values and historic heritage, and assesses whether those effects are appropriately managed in the context of the Project's benefits, proposed conditions, rehabilitation, monitoring, financial assurance and wider residual effects package.

A single Wildlife Act approval is sought to consolidate and replace existing protected-wildlife authorisations across the Project area and associated management areas. That approval would authorise the survey, capture, handling, salvage, relocation, monitoring, research-related handling and, where unavoidable, incidental injury or mortality of protected wildlife associated with construction, operation, rehabilitation and implementation of the residual effects package. It is supported by species-specific management plans for avifauna, lizards and snails, together with the wider biodiversity, pest-control, monitoring and rehabilitation framework.

Concessions are sought under the Conservation Act for activities on Crown Land administered by the Department of Conservation that are ancillary to, but necessary for, the Project. These include concessions for fly-rock deposition, infrastructure and access, water and dust monitoring, pest-exclusion fenced areas and implementation of the residual effects package. The concessions include replacement or consolidation of existing Stockton-related arrangements and new authorisations required for the Denniston Plateau, future mining areas and landscape-scale ecological management. They provide the authorisation framework for activities on conservation land that support safe and effective mining operations, environmental monitoring, access, rehabilitation and long-term biodiversity outcomes.

A Project-wide Archaeological Authority is sought under the FTAA for activities that would otherwise require authorisation under the HNZPT 2014. The authority would cover known

archaeological sites and potential unrecorded archaeological material across the Project area, including mining-related sites at Mine Creek, Iron Bridge and Koranui, and areas where subsurface archaeological material may be encountered during construction or mining. It is supported by the archaeological and historic heritage assessment, the Historic Heritage Management Plan and Archaeological Management Plan, and would provide for archaeological investigation, monitoring, recording, artefact management and accidental discovery procedures.

Freshwater fisheries approvals and dispensations are sought under the FTAA for activities that would otherwise require approval or dispensation under the Freshwater Fisheries Regulations. These relate primarily to culverts and diversion structures associated with the Upper Waimangaroa Haul Road, Mount Frederick South access, pest-exclusion fenced areas and clean-water diversions. The approvals focus on maintaining or providing for kōura passage where practicable, while dispensations are sought where passage is not practicable, where there is no defined watercourse or likely habitat, or where passage would compromise the pest-exclusion function of the structures. The approach is supported by aquatic ecology, hydrology and fish-passage assessments and would be implemented through detailed design, management plans, monitoring and adaptive management.

Crown Minerals Act approvals are sought for the mining permits and access arrangements required to lawfully undertake mining and mining operations across the Project area. Three mining permits are sought: a replacement permit for the Stockton coal mining licence and ancillary licences expiring on 31 March 2027; a new Mount Frederick South mining permit; and a replacement permit for the Sullivan coal mining licence and relevant ancillary licences expiring on 31 March 2027. Associated access arrangements are sought, varied or replaced where mining permit areas overlap Crown land administered by DOC or LINZ, including at Stockton, the Upper Waimangaroa Haul Road, Mount Frederick South and Escarpment Extended. Together, these approvals complete the Crown Minerals framework needed to access the coal resource, continue existing operations, authorise future mining areas, and secure access rights for mining operations, environmental management, monitoring, rehabilitation and closure.

A flow diagram explaining the structure of the Application documentation and how to navigate it is set out below (**Figure 0-1**).

APPROVALS SOUGHT UNDER THE FTAA
and how they are set out in this document

The BPCP is an integrated Fast-track application

The Project comprises interrelated mining areas, infrastructure, environmental management activities, rehabilitation and closure activities, residual effects measures, and approvals under several statutory regimes.

The application should be read as one integrated package

All parts of the application operate together to describe the overall Project and the coordinated approach to assessing, managing and securing the approvals required.

THE STRUCTURE OF THE APPLICATION REFLECTS TWO IMPORTANT CONSIDERATIONS

1

FTAA enables multiple approvals through a single Fast-track process

Because the Project components are functionally connected (mining areas, haul road, processing and logistics infrastructure, water management, rehabilitation, residual effects), they form part of a wider operating and environmental management system across the Buller Plateaux.

2

FTAA schedules require particular information for particular approval types

Common, Project-wide material is presented once, upfront. Later chapters and parts then address the specific requirements for each approval stream.

TO MAKE THE PACKAGE NAVIGABLE, THE APPLICATION IS ORGANISED INTO THE FOLLOWING PARTS

MAIN APPLICATION CHAPTERS – PART A

Part A contains the main application document.

It is the starting point for understanding the Project and the approvals sought.

PART A IS DIVIDED INTO 15 CHAPTERS

1. Project Overview
2. Mining Overview
3. Existing Environment
4. Project Description
5. Application Approach and Structure
6. Assessment of Environmental Effects
7. Management and Monitoring of Effects
8. RMA Approvals
9. RMA Statutory Assessment
10. *Conservation Act 1987* Approvals
11. *Wildlife Act 1953* Authorisations
12. HNZPTA Authorities (Heritage Approvals)
13. *Fisheries Act 1996* Authorisations
14. *Crown Minerals Act 1991* Approvals – Mining Permits
15. *Crown Minerals Act 1991* Approvals – Access Arrangements

A.1 to A.7 – THE FOUNDATION (PROJECT-WIDE MATERIAL)

Chapters A.1 to A.7 form the foundation.

They apply to all approvals under the FTAA and should be read together as the core Project-wide assessment.

THESE CHAPTERS EXPLAIN

- Who the Applicant is
- What the BPCP is and why it is required
- How the different Project sub-areas are connected
- The mining context and coal blending requirements
- The existing and proposed activities
- The environmental setting
- The approach taken to developing and structuring the application
- The actual and potential environmental effects of the Project
- The way those effects are proposed to be avoided, remedied, mitigated, managed, monitored, or otherwise addressed, and
- The management plan and conditions framework that will apply across the Project.

A.8 to A.15 – APPROVAL-SPECIFIC CHAPTERS

The later chapters in Part A address the particular statutory approvals sought under the FTAA. They are organised by approval type so the relevant FTAA schedule requirements and underlying legislative rquirements can be identified and addressed.

These chapters should not be read in isolation. Each relies on, and should be read together with, the Project-wide material in A.1 to A.7 and the other supporting parts (B, C, D, E, F, G and H).

PART B TECHNICAL REPORTS
Detailed technical information that supports the application

PART C PEER REVIEWS
Independent peer reviews of relevant technical reports

PART D MAPS AND FIGURES
Key maps, plans and figures supporting the application

PART E PROPOSED CONDITIONS (MASTER SET)
The proposed conditions applicable to the approvals sought

PART F CONSULTATION MATERIAL
Section 30 and letters from Key Stakeholders

PART G DRAFT MANAGEMENT PLANS
Draft management plans that set out how effects will be managed across the Project

PART H LANDOWNER AND CT RECORDS

Figure O-1: Approvals sought under the Fast-track Approvals Act 2024 (FTAA)

Approvals and Supporting Technical Assessments

The breadth and integrated nature of the Project assessment is reflected in **Figure 0**-2 below. The application is supported by a comprehensive suite of technical reports, specialist assessments, peer reviews and management plans that collectively inform the approvals sought under the FTAA pathway (**Parts B – G**). As illustrated by the matrix, many technical documents are relevant across multiple approval streams, demonstrating the interconnected nature of the Project, its environmental management framework and the comprehensive assessment undertaken to support decision-making.

APPLICATION DOCUMENT AND APPROVAL RELEVANCE MATRIX

	Technical Report, Peer Review Statement & Management Plan	RMA Approvals	Conservation Act Concessions	Wildlife Act Authority	Freshwater Fisheries Act Approvals & Dispensations	Heritage NZ Archaeological Authority	CMA Access Arrangements	CMA Mining Permits
B.1	EcoLogical Solutions – Terrestrial Ecological Impact Assessment Report	●	●	●			●	
B.2	Lloyd's Ecological Consulting – An Assessment of the Impacts of the BPCP on Powelliphanta patrickensis Snails and Proposed Effects Management	●	●	●			●	
B.3	Lloyd's Ecological Consulting – Modelling Trends in Powelliphanta patrickensis Snail Populations on Buller Plateaux	●	●	●				
B.4	Alliance Ecology – Residual Effects Management Report	●	●	●	●		●	
B.5	Alliance Ecology – Pest Mammal Survey	●	●	●			●	
B.6	Pestproof Fences – Possible responses of great spotted kiwi to pest exclusion fences on the Denniston and Stockton Plateaux	●	●	●			●	
B.7	Pestproof Fences – Pest exclusion fencing feasibility report Denniston and Stockton Plateaux	●	●	●	●		●	
B.8	Earth Sciences New Zealand – Assessment of Environmental Effects: Aquatic Ecology	●	●		●		●	
B.9	RMA Science – Water Quality Protection Guidelines	●	●		●		●	
B.10	Earth Sciences New Zealand – Kōura movement ecology and passage requirements	●	●		●			
B.11	Bathurst Resources Limited – Characterisation of Culverts for Kōura Passage	●	●		●			
B.12	Mine Waste Management – AMD Overview Report	●	●	●	●	●	●	
B.13	Mine Waste Management – Sediment Overview Report	●					●	
B.14	Process Flow – Active Water Treatment Testing Report Summary of Water Quality Testing	●					●	
B.15	Process Flow – Active Water Treatment Plant Basis of Design	●					●	
B.16	Mine Waste Management – Hydrological Assessment	●					●	
B.17	Courtenay Environmental – Wastewater Treatment for Escarpment Mine Extension, Denniston Plateau	●					●	
B.18	Courtenay Environmental – On-site wastewater management at Stockton Mine	●					●	
B.19	Bathurst Resources Limited – New Zealand West Coast Coal and Mining Operations A Technical Reference	●	●	●	●	●	●	●
B.20	Rough Milne Mitchell Landscape Architects – Landscape Assessment Report	●	●			●	●	
B.21	Rob Greenaway & Associates – Recreation and Tourism Assessment	●	●			●	●	
B.22	Clough & Associates – Archaeological and Historic Heritage Assessment	●	●			●	●	
B.23	Stantec – Denniston Plateau Access Integrated Transport Assessment	●	●					
B.24	Stantec – Stockton Mine Integrated Transport Assessment	●	●					
B.25	Stantec – SH 67 Kerrs Road Granity LCSIA	●						
B.26	Stantec – SH 67 Granity Ngakawau LCSIA	●						
B.27	Stantec – Millerton Road Ngakawau LCSIA	●						
B.28	Tonkin and Taylor – Air Quality Technical Assessment	●	●	●			●	
B.29	Tonkin and Taylor – Hazardous Substances Assessment	●	●				●	
B.30	Tonkin and Taylor – Outdoor Tyre Storage Technical Assessment	●					●	
B.31	Leading Design Professionals – Existing Infrastructure AEE – Lighting	●	●	●			●	
B.32	Leading Design Professionals – Proposed Infrastructure AEE – Lighting	●	●	●			●	
B.33	Marshall Day Acoustics – Assessment of Noise Effects	●		●		●	●	

	Technical Report, Peer Review Statement & Management Plan	RMA Approvals	Conservation Act Concessions	Wildlife Act Authority	Freshwater Fisheries Act Approvals & Dispensations	Heritage NZ Archaeological Authority	CMA Access Arrangements	CMA Mining Permits
B.34	AIGIS Group – Economic Impact Assessment	●	●	●	●	●	●	●
B.35	AIGIS Group – Social Impact Assessment	●	●	●	●	●	●	●
B.36	Ngāti Waewae – Cultural Impact Assessment	●	●	●	●	●	●	●
B.37	Pattle Delamore Partners – Mount Frederick South Geotechnical Assessment Report Pre-Feasibility Study	●					●	
B.38	Bathurst Resources – Pre-Feasibility Study: Escarpment Extension Geotechnical Assessment	●					●	
B.39	Bathurst Resources – Stockton Mine Executive Summary – Geotechnical	●					●	
B.40	Bathurst Resources – Upper Waimangaroa Haul Road (UWHR) Summary	●					●	
B.41	Pattle Delamore Partners – Geotechnical Assessment A-Drive Borrow Pit, Stockton Mine	●					●	
B.42	Bathurst Resources – UWHR and MFS Access Road Void Assessment	●				●	●	
B.43	Bathurst Resources – Sustainability, Energy Use and Greenhouse Gas Emissions	●						
B.44	Pattle Delamore Partners – Buller Plateaux Continuation Project Greenhouse Gas Assessment Report	●						
B.45	Bathurst Resources – Stockton Supporting Information to Accompany a Subsequent Mining Permit Application for CML 37150 and ACML 3715002		●				●	●
B.46	Bathurst Resources – Sullivan Supporting Information to Accompany a Subsequent Mining Permit Application for CML 37161, ACML 3716102 and ACML 3716103		●				●	●
B.47	Bathurst Resources – Mount Frederick South Supporting Information to Accompany a Subsequent Mining Permit Application		●				●	●
B.48	GHD – Water management and assessment of effects on waterways and water users from BPCP Stockton mining activities	●					●	
B.49	GHD – Hydrogeology of the Stockton area and the assessment of impacts on groundwater from BPCP Stockton mining activities	●					●	
B.50	InStream Consulting – Stockton Plateau Aquatic Ecology: history, thresholds and long-term management	●	●		●		●	
B.51	Bathurst Resources - Acid Mine Drainage History of AMD Management and Proposed Future Management	●			●		●	
B.52	Bathurst Resources – Stockton Mine 80-year water quality forecast	●					●	
B.53	Bathurst Resources – Millerton Water and AMD Management	●					●	
B.54	Bathurst Resources – Stockton Operational AMD Sludge Management	●					●	
B.55	Lane Associates Bond Process Description	●	●	●	●		●	
C.1	Roger MacGibbon – Terrestrial Ecology Peer Review	●	●	●			●	
C.2	Dr Bruce Burns – Vegetation Mapping and Zonation Peer Review	●	●	●			●	
C.3	Dr Robyn Simcock – Rehabilitation, Weeds and Biosecurity Peer Review	●	●	●			●	
C.4	Dr Darryl MacKenzie – Snail Population Peer Review	●	●	●			●	
C.5	Emeritus Professor Jon Harding – Aquatic Ecology Peer Review	●	●		●		●	
C.6	Andrew Rumsby – Water Quality Guidelines Peer Review	●	●				●	
C.7	Dr James Pope – AMD and Sediment Peer Review	●	●				●	
C.8	Dr Dora Avanidou – Hydrogeology Peer Review	●	●				●	
C.9	Craig Vincent – Stockton Hydrogeology Peer Review	●	●				●	
C.10	Tim Mulliner – Hydrology Peer Review	●	●				●	
C.11	Shannon Bray – Landscape and Visual Effects Peer Review	●	●			●	●	
C.12	Dr Neville Ritchie – Heritage and Archaeology Peer Review	●	●			●	●	

	Technical Report, Peer Review Statement & Management Plan	RMA Approvals	Conservation Act Concessions	Wildlife Act Authority	Freshwater Fisheries Act Approvals & Dispensations	Heritage NZ Archaeological Authority	CMA Access Arrangements	CMA Mining Permits
C.13	Greg Akehurst – Economics Peer Review	●	●	●	●	●	●	●
C.14	Julie Boucher – Social Impact Peer Review	●	●	●	●	●	●	●
C.15	Andrew Smith – Geotechnical Peer Review	●	●				●	
C.16	Campbell Stewart – Erosion and Sediment Control Peer Review	●	●		●		●	
G.1	Bathurst Resources – Rehabilitation Management Plan – BPCP-ENV-PLN-002	●	●	●	●		●	
G.2	Bathurst Resources – Avifauna Management Plan – BPCP-ENV-PLN-003	●	●	●			●	
G.3	Bathurst Resources – Powelliphanta Snail Management Plan – BPCP-ENV-PLN-004	●	●	●			●	
G.4	Bathurst Resources – Lizard Management Plan – BPCP-ENV-PLN-005	●	●	●			●	
G.5	Bathurst Resources – Aquatic Ecology Management Plan – BPCP-ENV-PLN-006	●	●		●		●	
G.6	Bathurst Resources – Biosecurity Management Plan – BPCP-ENV-PLN-007	●	●	●	●		●	
G.7	Bathurst Resources – Weed Management Plan - BPCP-ENV-PLN-008	●	●	●			●	
G.8	Bathurst Resources – Biodiversity Outcome Monitoring Plan – BPCP-ENV-PLN-009	●	●	●			●	
G.9	Bathurst Resources – AMD Water Management Plan – BPCP-ENV-PLN-010	●	●				●	
G.10	Bathurst Resources – AMD Engineered Landform Management Plan – BPCP-ENV-PLN-011	●	●				●	
G.11	Bathurst Resources – Water Infrastructure Design Plan – BPCP-ENV-PLN-012	●	●		●		●	
G.12	Bathurst Resources – Erosion and Sediment Control Plan for Land Disturbance Activities – BPCP-ENV-PLN-013	●	●		●		●	
G.13	Bathurst Resources – Hazardous Substances Management Plan – BPCP-ENV-PLN-014	●	●				●	
G.14	Bathurst Resources – Waste Management Plan – BPCP-ENV-PLN-015	●	●				●	
G.15	Bathurst Resources – Noise, Blasting and Vibration Management Plan – BPCP-ENV-PLN-016	●	●	●		●	●	
G.16	Bathurst Resources – Dust Management Plan – BPCP-ENV-PLN-017	●	●	●			●	
G.17	Bathurst Resources – Lighting and Visual Amenity Management Plan – BPCP-ENV-PLN-018	●	●	●			●	
G.18	Bathurst Resources – Traffic Management Plan – BPCP-ENV-PLN-019	●	●				●	
G.19	Bathurst Resources – Historic Heritage Management Plan – BPCP-ENV-PLN-020 (including appended Archaeological Management Plan)	●				●	●	
G.20	Bathurst Resources – Pest Control and Elimination Plan – BPCP-ENV-PLN-022	●	●	●	●		●	
G.21	Bathurst Resources – Conceptual Mine Closure Strategy – BPCP-ENV-PLN-050	●	●	●	●	●	●	
G.22	Bathurst Resources – Stockton Mine Environmental Water Management Plan – STO-ENV-PLN-013	●	●				●	
G.23	Bathurst Resources – Stockton Mine AMD Environment Management Plan – STO-ENV-PLN-016	●	●				●	
G.24	Bathurst Resources – Millerton Block Water and AMD Management Plan – STO-ENV-PLN-027	●					●	
G.25	Bathurst Resources – Ngākawau Operational Environmental Management Plan – STO-ENV-PLN-029	●	●				●	
G.26	Bathurst Resources – Stockton Mine Ground and Strata Instability Principal Hazard Management Plan – STO-TEC-PHMP-002	●					●	

Figure 0-2: BPCP Approval Matrix

Project Description

The Project description adopts a conservative greatest-extent consenting scenario. The current design identifies a total consenting footprint of approximately 2,661 ha across Stockton, the Upper Waimangaroa Haul Road, Mount Frederick South and Escarpment Extended. A substantial part of that area is already disturbed. The quantified disturbance areas sit within the overall approval envelope and are based on current design assumptions. Bathurst will continue to refine mine layouts, infrastructure and work methods within that envelope to avoid and minimise adverse effects where practicable.

The application is supported by a comprehensive suite of technical reports and peer reviews. The assessment of alternatives has considered mining methods, mine layouts and sequencing, transport options, processing strategy, water-management systems, engineered landform locations, infrastructure siting, rehabilitation methods and residual effects responses. The preferred configuration reflects the fixed location and variable quality of the coal resource, the need to achieve product blend specifications, worker safety, existing underground workings, geotechnical and hydrological constraints, ecological and heritage values, use of existing infrastructure and closure outcomes.

Existing Environment

The Buller Plateaux is a distinctive, high-rainfall, sub-alpine environment comprising exposed sandstone pavements, pākihi and other wetlands, shrublands, indigenous forest, steep escarpments and deeply incised streams. The area contains important ecological, landscape, cultural, historic and recreational values. It lies within the Ngākawau Ecological District and supports indigenous plants, birds, lizards, invertebrates and aquatic species, including snails and wetland and coal-measure ecosystems.

Natural inland wetlands are a particularly extensive feature of the proposed disturbance areas. Approximately 52% of the Escarpment Extended disturbance area, 70% of the Mount Frederick South disturbance area and 37% of the Upper Waimangaroa Haul Road footprint have been identified as natural inland wetland. The plateaux also contain naturally acidic, low-nutrient headwater streams. Many upper streams do not have finfish because of steep gradients and waterfalls; however, the assessments identify koura as being present.

The environment is also a long-established mining landscape. Mining has occurred across the Buller Plateaux for more than 130 years. Stockton is a highly modified operational mining environment, while parts of Denniston and Mount Frederick contain historic underground workings, former settlements, tramways, mine portals and other archaeological features. Acid mine drainage from historic mining is a defining environmental issue. Existing treatment and rehabilitation have produced measurable improvements in several Stockton catchments, although other waterways, particularly in the Millerton area, remain significantly affected.

The Project area is within the takiwā of Te Rūnanga o Ngāti Waewae with whom Bathurst has a longstanding relationship. The Cultural Impact Assessment identifies the importance of mana whenua relationships with land and water, rangatiratanga, kaitiakitanga, mauri and mahinga kai, and the need for ongoing cultural participation in environmental management, monitoring, rehabilitation and residual effects measures.

Summary of Key Adverse Effects

The Project would result in significant physical disturbance and unavoidable adverse effects. The principal effects requiring the Panel's consideration are summarised below. The detailed assessment of each effect is set out in Chapter 06 and the supporting technical reports.

Key Issue	Summary of potential and residual effects
Terrestrial and wetland ecology	The Project would involve clearance and fragmentation of indigenous vegetation, natural inland wetlands, pākihi, sandstone pavement and other specialised coal-measure ecosystems. Some affected habitats support Threatened or At-Risk plants, bryophytes, lichens, lizards, birds and invertebrates. Residual effects for several rare or difficult-to-recreate values are assessed as moderate to very high.
Freshwater ecology	The Project would permanently remove approximately 17.1 km of headwater stream habitat, comprising approximately 3.6 km at Mount Frederick South and 13.5 km at Escarpment Extended. Approximately 8.1 km and 12.7 km of stream habitat respectively are proposed to be reinstated. There would be temporal loss and uncertainty regarding the ecological equivalence of reconstructed headwater streams.
Water quality and hydrology	Potential effects include acid mine drainage, sediment and dissolved metals, and changes to surface water, groundwater and flow pathways. The assessment distinguishes between the legacy-affected Stockton environment and the less-modified extension areas, where prevention and protection are central to the water-management approach.
Landscape and visual effects	Effects would be most evident during active mining at Mount Frederick South and Escarpment Extended. Effects are expected to reduce progressively following rehabilitation and removal of mining infrastructure, although some permanent landform change would remain.

Key Issue	Summary of potential and residual effects
Historic heritage	The Project would modify or remove some archaeological and mining-heritage features where avoidance is not practicable. These effects have been assessed in the context of the wider historic mining landscape and the proposed heritage recording, management and enhancement measures.
Recreation and access	The Project would restrict access to parts of the plateaux used for four-wheel driving, walking, cycling, heritage appreciation and other recreation. Access management, communication, reinstatement and enhancement measures are proposed.
Amenity and operational effects	Potential effects relating to noise, vibration, traffic, lighting, dust, waste, hazardous substances, geotechnical stability and natural hazards have been assessed. Subject to the proposed controls, most of these effects are expected to be localised and minor, low or less than minor.
Closure and long-term obligations	Long-term management would be required for acid mine drainage, rehabilitated landforms, passive treatment systems, ecological outcomes and retained infrastructure. Some Stockton water-treatment obligations are expected to continue for many decades.

Measures to Avoid, Minimise, Remedy, Mitigate and Address Effects

The Project has been developed by applying an effects-management hierarchy where practicable. Avoidance and minimisation have informed the location and extent of disturbance, mine layout, infrastructure siting, staging and construction methodology. Where adverse effects cannot be avoided, the Project proposes remediation, mitigation, rehabilitation and measures to address residual effects.

Key measures include clean-water diversions, staged earthworks, erosion and sediment controls, selective handling and encapsulation of acid-forming materials, engineered landforms, active and passive water treatment, progressive rehabilitation, vegetation direct transfer, indigenous planting, fauna salvage and relocation, biosecurity controls, pest and weed management, archaeological recording, managed public access, and controls for noise, vibration, traffic, lighting, dust, waste and hazardous substances.

Rehabilitation is proposed to occur progressively, as soon as practicable once areas reach final landform. It would be guided by defined rehabilitation domains and measurable completion criteria. Vegetation direct transfer would be prioritised where practicable because

it retains soils, seed banks, vegetation structure, microhabitats and some low-mobility fauna. Where direct transfer is not practicable, rehabilitation would use soil transfer, indigenous planting, natural regeneration and habitat enhancement.

The rehabilitation framework recognises that not all affected ecological values can be recreated within the Project timeframe. Monitoring, maintenance and remedial work would continue until applicable completion criteria are achieved, with adaptive management where monitoring shows outcomes are not tracking as intended.

Water Management

Water management is central to the Project. The proposed approach distinguishes between the existing Stockton operation, where the focus is continued treatment, betterment and managed recovery in an existing acid-mine-drainage environment, and the extension areas, where the focus is prevention and protection through source control, separation of clean and mine-impacted water, capture and treatment, site-specific water-quality limits and monitoring.

Potentially acid-forming materials would be classified, tracked and encapsulated in engineered landforms. During operations, mine-impacted water would be captured and treated to manage acidity, sediment and dissolved metals prior to discharge. Movement from active to passive treatment at closure would be based on demonstrated environmental performance and the ability of final landforms and passive systems to maintain required receiving-environment outcomes.

Monitoring would include baseline, reference, performance, compliance and post-closure components. Water quality, flow, seepage, sediment and ecological results would be assessed against defined objectives, limits and trigger levels. Trigger-action response processes and adaptive management would enable treatment, storage, discharge, rehabilitation and source-control measures to be refined over time.

Residual Effects Package

After avoidance, minimisation, remediation, mitigation and rehabilitation, residual effects arising from the Project implementation would remain. To address ecological effects, Bathurst proposes a significant landscape-scale residual effects package covering approximately 26,259 ha. The principal components are:

- Four pest-exclusion fenced areas at Denniston North, Coalbrookdale, Mount Augustus and Whirlwind Rise, totalling approximately 911 ha.
- Intensive predator control across approximately 1,505 ha in the Blackburn Pākihi Intensive Ground Control Area.

- Weed management across approximately 9,431 ha, including approximately 6,713 ha treated as compensation.
- A wider managed Landscape Scale Control Zone of approximately 25,000 ha.

The package is intended to shift ecological trajectories away from ongoing decline caused by introduced predators, browsers and weeds, and toward stabilisation and recovery of indigenous biodiversity values. It is expected to improve survival and recruitment for a range of native fauna, protect representative wetland, forest and coal-measure habitats, and support ecological resilience and connectivity across the wider Buller Plateaux landscape.

The Project also includes a regional fish-passage remediation programme, a Historic Heritage Enhancement Fund, managed recreation access arrangements, a Recreational Enhancement Fund along with a Recreation User Group, and reinstatement or enhancement of recreation opportunities following rehabilitation.

The residual effects package is a substantial and significant component of the Project's overall response to adverse effects. It is proposed at a landscape scale, would require long-term funding, governance, monitoring and adaptive management, and is intended to deliver biodiversity, heritage, recreation and freshwater outcomes well beyond the immediate mine footprints.

Engagement

Mining is an integral component of the local Buller community. Project development has been informed by long standing engagement with Te Rūnanga o Ngāti Waewae, local communities, employees, contractors, recreation and heritage groups, infrastructure providers, emergency services, statutory agencies and regulators. Engagement has included meetings, workshops, site visits, community sessions, correspondence and technical information sharing.

That engagement has informed the Project design and proposed management framework. Examples include refinement of water-management proposals affecting the MaPPS Reserve, access arrangements for Mount Rochfort and Mackley Track, walking and cycling access along the haul-road corridor, a protocol for recording and managing mining artefacts, utility and emergency-access protocols, and targeted responses to noise, dust and rail-operation matters at Ngākawau.

The proposed conditions are intended to provide for ongoing engagement with Ngāti Waewae, cultural monitoring and input into relevant aspects of Project implementation. The relationship with mana whenua is expected to continue through construction, operation, rehabilitation, closure and relinquishment.

Conditions, Management Plans and Financial Assurance

The effects-management framework would be secured through proposed conditions and an integrated suite of management plans. The draft management plans submitted with the application address closure, rehabilitation, aquatic and terrestrial ecology, threatened fauna, biodiversity outcomes, pest control, weed management, biosecurity, acid mine drainage, engineered landforms, erosion and sediment control, water infrastructure, historic heritage, traffic, lighting, dust, noise, blasting, vibration, waste and hazardous substances.

Key management plans would be subject to independent technical review by a Peer Review Panel, and certification by the relevant consent authorities before implementation. DOC and Te Rūnanga o Ngāti Waewae are proposed to have opportunities to review and comment on relevant plans as technical and cultural participants. Monitoring and reporting requirements would provide the basis for checking performance against objectives, limits and completion criteria, and for implementing adaptive management if required.

Rehabilitation and closure obligations would be supported by a comprehensive financial assurance framework comprising existing bonding arrangements, new project-specific bonds and the establishment of a long-term trust. Existing Stockton and Cypress bonding arrangements, Crown indemnity mechanisms and acid mine drainage management arrangements would continue. Separate common bonds are proposed for Mount Frederick South, Escarpment Extended and the Upper Waimangaroa Haul Road, with bond values reviewed regularly to reflect the extent of disturbance, completed rehabilitation and remaining closure, rehabilitation and residual effects obligations. The bonds are intended to provide regulators with access to sufficient funds to complete rehabilitation, closure and associated management measures should an approval holder default. Bathurst also proposes establishing a trust to assume responsibility for certain long-term obligations associated with ecological rehabilitation, the residual effects package, pest control and pest-exclusion areas, providing an enduring mechanism for the governance, funding and delivery of long-term environmental outcomes beyond the active mining phase.

Overall Assessment

The BPCP has been designed and assessed in recognition of the sensitive receiving environment in which it would operate. The technical assessments identify that, notwithstanding the proposed avoidance, mitigation, rehabilitation and residual effects measures, some adverse effects would remain, particularly in relation to terrestrial and wetland ecology, freshwater habitat, landscape values and historic heritage. Those effects have been assessed transparently and are addressed in the application through the proposed conditions, management plans, monitoring, financial assurance, rehabilitation commitments and residual effects package.

Those effects must be considered alongside the consequences of the base case. Stockton is not an isolated industrial activity; it is part of the economic and social fabric of Buller and the wider West Coast. The mine supports workers, families, contractors, local suppliers, community organisations, emergency-response capacity and the regional infrastructure that connects the Coast to national and international markets. For Westport and the surrounding communities, an abrupt end to production would not simply be a reduction in output. It would mean the loss of a major source of local income, a contraction in local business activity, increased uncertainty for households and schools, and a materially shorter period for the region to plan for transition.

By contrast, the Project would provide a managed continuation pathway. It would sustain employment and household income, maintain local procurement and community investment, support continued use of rail and port logistics, and provide government revenue and export earnings over the Project life. It would also retain the experienced operator presence, site-specific knowledge and operational systems required to manage Stockton's legacy acid mine drainage, avoiding the practical and environmental risks of an abrupt handover of that responsibility when current approvals expire. In that respect, continued mining is also a mechanism for continuing active environmental management of the Stockton legacy. The Project would fund long-term rehabilitation, biodiversity, fish-passage, heritage and recreation initiatives at a scale that would not occur if mining ceased as current approvals expire.

Bathurst's position is that the Project has been appropriately refined through alternatives assessment, technical investigation, peer review and engagement, and that its adverse effects can be appropriately avoided, remedied, mitigated, managed, monitored or otherwise addressed through the proposed conditions, management plans, rehabilitation and closure requirements, adaptive management, financial assurance and the comprehensive residual effects package. For the reasons set out in this application, Bathurst considers that, with those measures in place, the Project's adverse effects would not be out of proportion to its regional and national benefits.