

12 March 2026

Clean Energy Regulator  
GPO Box 621  
Canberra ACT 2601

Dear Clean Energy Regulator,

**RE: FY24/25 Safeguard Mechanism – Section 72C – Written Explanation**

We refer to section 72C of the *National Greenhouse and Energy Reporting (Safeguard Mechanism) Rule 2015*, which requires a written explanation when the total amount of Australian Carbon Credit Units (ACCUs) being surrendered are equal to or greater than 30 per cent of the facility's baseline emissions number.

For the 2024-25 financial reporting year, Byerwen Coal Pty Ltd (Byerwen), as the Responsible Emitter for the Byerwen Coal Mine (Facility), will surrender a quantity of ACCUs that are greater than 30 per cent of the Facility's Safeguard Mechanism baseline emissions.

As Byerwen operates under a mining contractor model, its contractors play a crucial role in the ability to reduce Byerwen's emissions footprint.

A significant portion of Byerwen's diesel consumption (representing Scope 1 emissions) is directly attributable to contractor-operated mobile mining equipment. Byerwen works with its contractors to improve fuel efficiency, operational performance and emissions management and to assess lower-carbon technologies and diesel alternatives such as HVO. Product innovation initiatives have reduced explosives consumption and associated value chain emissions.

Commercially viable large-scale solutions for fugitive methane and diesel-related emissions remain limited.

Byerwen will continue to evaluate and progress options to reduce emissions in line with its Safeguard Mechanism obligations, including collaboration with contractors and consideration of emerging technologies as they become technically feasible and commercially viable.

Where full abatement is not technically or economically feasible, CER-approved carbon offsets will continue to be utilised to ensure compliance with Byerwen's emissions obligations.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Christopher Wallin', is written over a horizontal line.

Christopher Wallin  
Managing Director  
Byerwen Coal Pty Ltd