

26 March 2026

Clean Energy Regulator  
GPO Box 621  
Canberra ACT 2601

**Re: Explanation under the Safeguard Mechanism – surrender of ACCUs equal to or greater than 30% of baseline emissions**  
**Facility: DEN01**  
**Responsible emitter: Dendrobium Coal Pty Ltd**  
**Monitoring period: 1 July 2024 to 30 June 2025**

The Dendrobium underground coal mine is a longwall mining operation that has progressively extracted coal from different mining domains over its operating life. More recently, the facility has transitioned into a newer mining domain with significantly different seam gas characteristics to those that applied when the facility's Safeguard Mechanism baseline was established. The baseline was set over the FY18 to FY22 period, when the mine was operating in a comparatively low-gas domain. By contrast, the current mining domain has materially higher gas content, resulting in significantly higher Scope 1 emissions.

To respond to this higher-gas environment, the facility has implemented substantial in-seam gas drainage, gas capture and safety measures. Dendrobium Mine has also invested in infrastructure which will support methane abatement where gas levels allow this.

Notwithstanding these actions, Dendrobium Coal Pty Ltd is currently assessing a range of additional opportunities to reduce emissions at the facility, where feasible and appropriate, including through further operational improvements and potential technology solutions.

Yours faithfully



Brenton Kuss  
Chief Financial Officer  
for and on behalf of **Dendrobium Coal Pty Ltd**