



18 February 2026

Safeguard Team
Clean Energy Regulator
GPO Box 621
Canberra ACT 2601

RE: Section 72C of the NGER (Safeguard Mechanism) Rule 2015 – BM Alliance Coal Operations Pty Limited (BMA Co)

Section 72C(5) of the *National Greenhouse and Energy Reporting (Safeguard Mechanism) Rule 2015* requires BMA Co provide the Clean Energy Regulator with a written explanation of why more carbon abatement was not undertaken at a facility during a period.

The number of Australian carbon credit units surrendered by BMA Co for Goonyella Broadmeadow Mine (**GBM**) will exceed the facility's baseline emissions number by more than 30% in 2024-25. BMA Co addresses the matters required by section 72(5) as follows:

1. GBM's main sources of covered emissions are:
 - Open cut mining (Goonyella Mine):
 - diesel fuel combustion by equipment used in overburden removal and coal extraction;
 - fugitive methane and CO₂ from coal extraction.
 - Underground mining (Broadmeadow Mine):
 - ventilation air methane (VAM);
 - the drainage and flaring of coal mine waste gas;
 - post-mining emissions from above-ground handling and storage of mined coal.
2. More carbon abatement was not undertaken at GBM due to the following limitations in available technologies:
 - Technology for large scale diesel displacement and mining fleet decarbonisation is not currently technically (low technology readiness), commercially and operationally viable. Original equipment manufacturers (OEMs) are working to mature the technology and adapt their products to address this, to enable future adoption at commercial scale. BMA Co, through BHP, is actively working with OEMs to advance this.
 - There is limited fugitive emissions abatement technology available for the relatively low coal seam methane intensity of current open cut operations at GBM. A seam gas resource characterisation drilling and testing program is being undertaken to identify potentially viable sites and seams for future pre-mining gas drainage. BMA Co, through BHP, is also participating in research and development of novel techniques for open cut fugitive abatement.
 - Broadmeadow Mine flares as much of its drained gas as is currently safe and technically practical using well-established techniques. However, the mine's relatively low ventilation air methane concentration is not amenable to the VAM abatement technologies that are currently under development in Australia and potentially deployable at scale in the medium term.

Regards

A handwritten signature in black ink, appearing to read 'AL', is positioned above the printed name of Adam Lancey.

Adam Lancey
Asset President