

Awa Koura Mining Limited

Proposed Sandy Point Gold Mine

Dust Management Plan

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Confidential

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Dust Management Plan

Awa Koura Mining Limited

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1 Introduction

1.1 Project Overview

Awa Koura Mining Limited is proposing to undertake an alluvial gold mining operation for a period of up to three years on farmland located along the Clutha River/Mata-Au terraces, north of Queensberry and southeast of Luggate in Central Otago. The operation is proposed to commence at the southern end of the proposed area, progressively moving northward and restoring the land, so that previously consented residential development may begin immediately thereafter.

1.2 Purpose of the Dust Management Plan

This Dust Management Plan (DMP) has been prepared to identify potential sources of dust generated by the proposed Sandy Point gold mining operation and to outline the measures that will be implemented to avoid, remedy, or mitigate dust emissions. The DMP provides a framework for proactive dust control, monitoring, and response to ensure that adverse effects on human health, amenity, and the surrounding environment are minimised as far as practicable. The DMP has been developed in accordance with the Ministry for the Environment's *Good Practice Guide for Assessing and Managing Dust*¹.

1.3 Key Personnel and Contacts

The Site Manager has overall responsibility under delegation from the General Manager for all aspects of the mining operation including the implementation of the DMP. On a day-to-day basis, site personnel are responsible for carrying out specific tasks on site and in relation to this DMP, however at all times these personnel are accountable to the Site Manager. It is estimated that there will be six permanent staff employed to run the mining operation.

Table 1-1: Key personnel, contacts and responsibilities

Name	Role	Mobile	Email
	General Manager		
	Site Manager		
	Environmental Manager		

¹ Ministry for the Environment (MfE). 2016. *Good Practice Guide for Assessing and Managing Dust*. Wellington: Ministry for the Environment.

1.4 Staff Training and Records

Records of staff training should be updated as necessary and stored by Awa Koura Mining Limited. The records should include aspects such as staff training completed, methods used and frequency of training. It should also be noted in training records when staff have reviewed and understood this DMP and the actions required of them under it.

1.4.1 *DMP Induction*

All site personnel are required to have completed an induction process which covers the requirements of the DMP. The purpose of the induction process is to equip personnel with the knowledge required to effectively implement and comply with all requirements of the DMP.

Visitors to site may also be required to complete this induction process if they are involved in activities at the site which have the potential to generate discharges of contaminants to air.

Where visitors or other personnel at the site have not completed the DMP induction, and where they are accessing areas of the site with the potential for discharges of contaminants to air to be generated, they will be accompanied by personnel who have completed the induction.

The **Site Manager** is responsible for ensuring that all appropriate personnel have undertaken the DMP induction as required.

2 Site Description and Context

2.1 Location and Surrounding Environment

The site at Sandy Point is a relatively flat area in the Central Otago District of Queensberry located within a predominantly rural and topographically complex environment. The surrounding area is a valley system characterised predominantly by rural farmland with mountainous terrain to the east and south-west. The Clutha River/Mata-Au bounds the site to the east. The land parcel (Lot 1 DP 466676, Title Number: 623528) on which is the site is located has a land area of 698,680 m².

There are 28 potentially sensitive receptors surrounding the site that have a portion of their property within 350m of the site boundary. 26 are residential receptors and two are both residential and commercial.

2.2 Site Layout and Activities

Mining will be undertaken following a zig-zag pattern starting at the southern end and moving northward. In general, the active area will be limited to no more than two hectares at any one time. (During the winter months, re-establishment of pasture cover may be delayed due to cold conditions, resulting in up to four hectares of disturbed ground that is not fully restored). Once the active site has been remediated, the development works will follow behind.

Work hours will be Monday to Friday for up to 10 hours a day, at a screening throughput of 200 m³ per hour.

Daily site activities will consist of mechanical excavators positioned on the working bench area to feed material into the floating shaker plant, where the gold product will be separated from the rock and finer material. Tailings in the form of washed rocks will accumulate behind the screening pond before being periodically levelled, once or twice per month topsoil will be relocated from in front of the screen to the reclaimed areas behind it, enabling subsequent lifestyle block development to commence. No active stockpiles will be present on site, the initial material removed to commission the site will be re-vegetated as soon as practicable and maintained in that state until repurposed during decommissioning of the site.

The primary potential sources of dust associated with site activities and therefore covered in this DMP are as follows:

- topsoil stripping
 - the soil on this site is known to be comprised of loose sediments which can be easily dispersed when disturbed
- material handling and placement of oversize or tailings material following dewatering
 - dropping material from any height can release dust
 - tailings will initially be wet when piled however if allowed to dry, dust that was not removed from the rock could be picked up in windy conditions
- wind erosion from exposed surfaces and stockpile
 - dust from exposed surfaces or stockpiled material can be picked up and dispersed during windy conditions
- vehicle movements on unsealed access roads
 - vehicle movement can resuspend deposited dust, particularly on unsealed surfaces
- rehabilitation activities
 - similar to the initial stripping movement

2.3 Site Equipment

On site equipment will typically include:

- 1 floating gold shaker screen (continuous use)
- 1 large excavator, 50-60 tonnes (continuous use)
- 2 smaller excavators, 20 and 30 tonnes (intermittent use)
- 2 contractors' vehicles (1-2 times per month)
- 1 bulldozer (intermittent use)

3 Dust Mitigation Measures

3.1 Good Housekeeping Practices

Good housekeeping practices, including but not limited to, the measures outlined below, shall be implemented from the commencement of operations and maintained throughout the life of the project.

- Ensure site staff are properly trained to respond to potential dust emissions
- Daily visual monitoring by site staff of site activities for fugitive dust²
- Take account of daily forecast wind speed, wind direction and soil conditions before commencing daily works.
- Carry out regular site inspections to monitor compliance with the DMP, record inspection results, and make an inspection log available to Central Otago District Council (CODC) if requested.
- Record any exceptional incidents that cause dust either on- or off-site, and the action taken to resolve the situation in a logbook.
- Construction machinery should be maintained in accordance with manufacturers recommendations, which can be managed through weekly check sheets to identify any faults/servicing requirements.

3.2 Activity Specific Controls

When operating mining works, a range of mitigation and management measures can be employed. A selection of the recommended measures are provided in this section and have been broken down into actions for each type of dust producing activity.

3.2.1 *Earthmoving*

- Adequate irrigation systems must be available on site to dampen areas that are to be earth worked prior to any earthwork commencing and shall be used when required on site until the rehabilitation is complete and further earthworks are not required.
- Limit drop heights from excavator to screen.

3.2.2 *Stockpile*

- Limit the height and slope of the stockpile to reduce wind entrainment. Stockpiles exceeding 3 metres in height have a higher risk of discharging dust.
- Re-vegetate initial stockpile as soon as practicable.
- Keep initial stockpile damp at all times while waiting for vegetation to grow.
- Inspect stockpile weekly to ensure appropriate management.

² As defined in *Ministry for the Environment. 2016. Good Practice Guide for Assessing and Managing Dust*, Fugitive dust is from sources that are not stacks i.e., diffuse sources – for example dust blown from storage piles, road dust, dust leaking from a building.

3.2.3 *Exposed Surfaces*

- Limit the area of exposed surfaces as much as practicable.
- Wet suppression of unpaved areas shall be applied during dry windy periods, using a water cart and/or fixed sprinklers. Typical water requirements for most parts of New Zealand are up to 1 litre per square metre per hour.
- Compact all unconsolidated surfaces where practicable.
- Cover or frequently dampen stripped areas not in active use for mining or access if liable to cause excessive dust during windy conditions.
- During winter periods when unable to re-establish pasture cover due to cold conditions, maintain irrigation system that can be used to increase moisture levels in exposed areas.

3.2.4 *Tailings Pile*

- Reduce height of tailings pile by levelling as soon as practicable.
- Rehabilitate mined area as soon as practicable.
- Stabilise tailings if rehabilitation will not happen immediately. Methods may include wetting with polymer additives to facilitate crusting, metalling, grassing, mulching or the establishment of vegetative cover.

3.2.5 *Vehicle and Plant Movements*

- Implement a site speed limit of 10-15 km/hr.

3.2.6 *High Wind or Dry Conditions*

- Consider pausing work if windspeeds are greater than 5 m/s for more than 20 minutes.
- Conduct dusty operations during weather conditions that minimise emissions wherever possible, particularly where no other mitigation option is available (e.g., avoid windy dry weather days for ground stripping).
- Consider increasing the frequency of wetting exposed surfaces if there has been no rain in last few weeks.

3.3 *Contingency Procedures*

The measures listed above should be sufficient to control the expected dust from the proposed mining operations. However, if adverse effects from site activities on sensitive receptors are identified and confirmed, the following contingency measures could be implemented as appropriate.

3.3.1 *Housing Exteriors*

If dust is noticeably settling on nearby homes, steps would be taken to address the issue as soon as practicable. For example, water carts or similar devices could be used to wash down the exterior of houses and remove accumulated dust.

3.3.2 *Alternatives for Clothes Drying*

If occupants' laundry gets soiled while drying outside, solutions would be discussed with the property owner individually. Ensure all standard mitigation measures are still in place to prevent further impacts.

3.3.3 *Alternatives for Drinking Water Sources*

If any roof-collected drinking water supply is contaminated with dust, initial investigation into source would be undertaken as in complaint procedure (Section 5). Turbidity testing of the tank water may also be required. The water sample may be tested against drinking water standards to confirm safety. Beyond this, measures may include provision of an alternate source of water and confirmation that where first flush systems are in place, it may be appropriate to clean or replace filters and refill or replace water tanks.

4 Monitoring and Inspection

4.1 Baseline Dust Monitoring

Given the site's location, daily dust accumulation is expected to occur naturally. To address potential complaints about dust caused by operations, the site will conduct dust monitoring before work begins in four locations pre-agreed with CODC. This establishes a baseline dust level for the area, which can later be compared with measurements taken from the same locations during active site operations.

Dust deposition gauges, which collect dust over one-month periods in designated spots, are recommended for this purpose. While these gauges cannot pinpoint the dust source, they do measure overall dust concentrations that can be assessed against MfE guidelines (Table 4-1).

If there are complaints during operation, dust gauges would be deployed again and results compared to the baseline concentrations previously collected.

4.2 Visual Monitoring

Visual monitoring will be conducted on site by all site staff daily during the course of their normal duties. This ensures that mining dust mitigation measures are effective and that any dust crossing the site boundary towards any receptors is noted and mitigated as soon as practicable.

Visual monitoring allows site staff to assess the impact of activities in real time and as weather conditions change, they can quickly implement dust control measures as needed. If visible dust plumes are produced or dust is seen crossing the site boundary this will be logged along with weather conditions at the time and reported to the site environmental manager to increase mitigations.

4.3 Meteorological Monitoring

For a site like this where local meteorology stations are not considered to be representative of site conditions, an on-site meteorology station will be required. This will aid in any complaint investigations as well as inform site staff if additional mitigation may be needed due to daily conditions. As a minimum this monitor would be able to measure rainfall, temperature, wind direction and wind speed.

Site staff will check weather conditions daily to ensure appropriate mitigation are in place for expected conditions.

4.4 Continuous Monitoring (PM₁₀)

Continuous monitoring of particulate matter with a diameter of 10 µm or less (PM₁₀), and comparison to trigger values will be considered if visual monitoring indicates that there are ongoing dust impacts offsite during mining activities. Real-time data from low-cost sensors provide the community and regulatory bodies with confidence that health and well-being, as well as complaints, are being considered.

It is not proposed to implement continuous monitoring unless trigger levels for visual monitoring are breached. If continuous monitoring is implemented, consultation with an Air Quality Specialist should be completed to determine representative locations to install monitors and the appropriate type of monitor to use.

4.5 Trigger Levels and Response

Dust monitoring and management responses shall be adaptive and responsive to site conditions. The following triggers would prompt a review of dust controls and the implementation of additional response actions or monitoring measures where appropriate.

Triggers for additional management or monitoring may include, but are not limited to:

- Ineffective dust suppression during dry and/or windy conditions
- Repeated dust-related complaints from receptors
- Sustained adverse weather conditions that increase dust generation risk
- Breach of trigger levels (Table 4-1)

Table 4-1: Suggested trigger levels for total suspended particulate (TSP), PM₁₀ and Deposited Dust

Trigger	Type	Averaging period	Trigger levels
Visible Dust	TSP	Instantaneous	Visible dust crossing the boundary
Wind Warning	TSP	1 minute	10 m/s (during two consecutive 10-minute periods)
Monthly	Deposited Dust (if measured)	30 days	4 g/m ² /30 days ³
Short Term ⁴	PM ₁₀ (if measured)	1 hour	150 µg/m ³

4.5.1 Response Actions

Where one or more triggers are observed, the following response actions will be implemented as appropriate:

- Increased frequency or volume of water application for dust suppression
- Review and adjustment of existing dust control measures
- If excessive, implementation of contingency measures
- Temporary reduction or cessation of dust-generating activities
- Introduction of instrumental dust monitoring or dust gauges where required

4.6 Records and Documentation

Appropriate records shall be maintained to demonstrate effective implementation of dust management measures and compliance with consent requirements. All records shall be retained on site and made available to the CODC upon request, and may include, but are not limited to, the following:

³ Above baseline concentration

⁴ Only used for instrumental monitoring

4.6.1 *Monitoring Records*

- Any visual monitoring notes

4.6.2 *Control and Maintenance Records*

- Maintenance records for dust suppression equipment
- Records of changes to operating practices in response to dust

4.6.3 *Incident and Complaint Records*

- Dust incidents
- Complaints received
- Investigation outcomes and corrective actions

5 Complaints Procedure

The person to whom complaints shall be made is listed in Table 1-1 of this DMP. If a complaint is received in relation to dust relating to site activities, the complaints procedure that is to be followed in such circumstances is set out in this Section. A flow chart of the complaints' procedure is included as part of Appendix A-1.

5.1 Actions to be undertaken upon receipt of a complaint

- 1) The time and date that the complaint is received, the nature of the complaint and if provided, the name of the complainant and associated contact information (e.g. address and contact phone number), is to be recorded in the Complaints Log (Appendix A-1) and notified to CODC. This should be done as soon as practicable (e.g., no more than 2 hours after the receipt of the complaint).
 - 2) The Site Manager, or other delegated personnel, upon receipt of the complaint, shall in a timely manner:
 - a) Investigate the complaint to ascertain whether the site activities are resulting in a discharge to air, which is objectionable to the extent that it causes an adverse effect at or beyond the site boundary.
 - b) During this investigation phase, the weather conditions that may be relevant to the complaint are to be ascertained (refer to Complaints Log contained in Appendix A-1).
 - c) If, as a result of the investigation, it is considered that **there is no discharge**, which is objectionable to the extent that it causes an adverse effect at or beyond the site boundary, then no further action is required. Evidence e.g. photographs, may be collected to support this assessment.
 - d) If, as a result of the investigation, it is considered that **there is a discharge** which is objectionable to the extent that it causes an adverse effect at or beyond the site boundary, then corrective and future actions are to be identified which mitigate this effect. These actions are to be implemented as soon as practicable and added to this DMP if appropriate.
 - 3) A record of all the actions carried out in accordance with Step 2 above shall be recorded in the Complaints Log (Appendix A-1) All complaints that are received will be held by Awa Koura Mining Limited.
 - 4) A response, in writing, shall be provided to the complainant, if contact information was provided. The response shall outline the investigation undertaken and the corrective and future actions that will be implemented, if appropriate. A record of the response shall be recorded in the Complaints Log.
-

5.2 Reporting to CODC

Awa Koura Mining Limited shall notify CODC of each complaint received as soon as practicable after receiving the complaint.

The Complaints Log shall be made available to the Council at all reasonable times and as requested by CODC. The Complaints Log shall also be forwarded to CODC annually.

6 System Review and Reporting Procedures

6.1 Review

This DMP is a living document. As such, it will be amended and updated, subject to CODC approval when required. Any amendments to the DMP will arise from the need to accommodate any site management changes which have an effect on the discharges to air arising from the site activities. Any such amendments are to ensure that the DMP continues to comply with its purpose. The Record of Amendment table on page 2 of this document should be used to record these amendments.

If no specific review timeframes are mandated by CODC, Awa Koura Mining Limited will undertake an annual review of the DMP. The review shall be completed within 12 months of consent being granted. If the need to revise the DMP is identified then the DMP is to be amended, subject to CODC approval. However, if the review identifies that the DMP does not need to be amended then the DMP shall remain unchanged.

At all times, Awa Koura Mining Limited shall ensure that the site activities are undertaken in accordance with the most recent, and CODC approved, version of the DMP.

6.2 Approval

The DMP, and subsequent amendments to the DMP, is subject to CODC's approval before coming into effect. To gain this approval, a copy of the DMP requiring approval is to be submitted to CODC. The amended DMP can only be used at the site following receipt of CODC's written approval.

6.3 Reporting to CODC

The requirements to provide information to CODC should be laid out in the consent. Following consent approval this section should be updated to include these requirements, or a copy of these requirements shall be appended to this DMP.

7 Limitations

This report (**'Report'**) has been prepared by WSP New Zealand Limited (**'WSP'**) exclusively for Awa Koura Gold Limited (**'Client'**) in relation to development of a dust management plan for their proposed gold mine in Sandy Point (**'Purpose'**) and in accordance with the Short Form Agreement dated 25 March 2026 (**'Agreement'**). The findings in this Report are based on and are subject to the assumptions specified in the Report and Offer of Service dated 24 March 2026. WSP accepts no liability whatsoever for any use or reliance on this Report, in whole or in part, for any purpose other than the Purpose or for any use or reliance on this Report by any third party.

In preparing this Report, WSP has relied upon data, surveys, analysis, designs, plans and other information (**'Client Data'**) provided by or on behalf of the Client. Except as otherwise stated in this Report, WSP has not verified the accuracy or completeness of the Client Data. To the extent that the statements, opinions, information, conclusions and/or recommendations in this Report are based in whole or part on the Client Data, those conclusions are contingent upon the accuracy and completeness of the Client Data. WSP will not be liable for any incorrect conclusions or findings in the Report should any Client Data be incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to WSP.

APPENDIX A-1

Complaints Record and Procedures

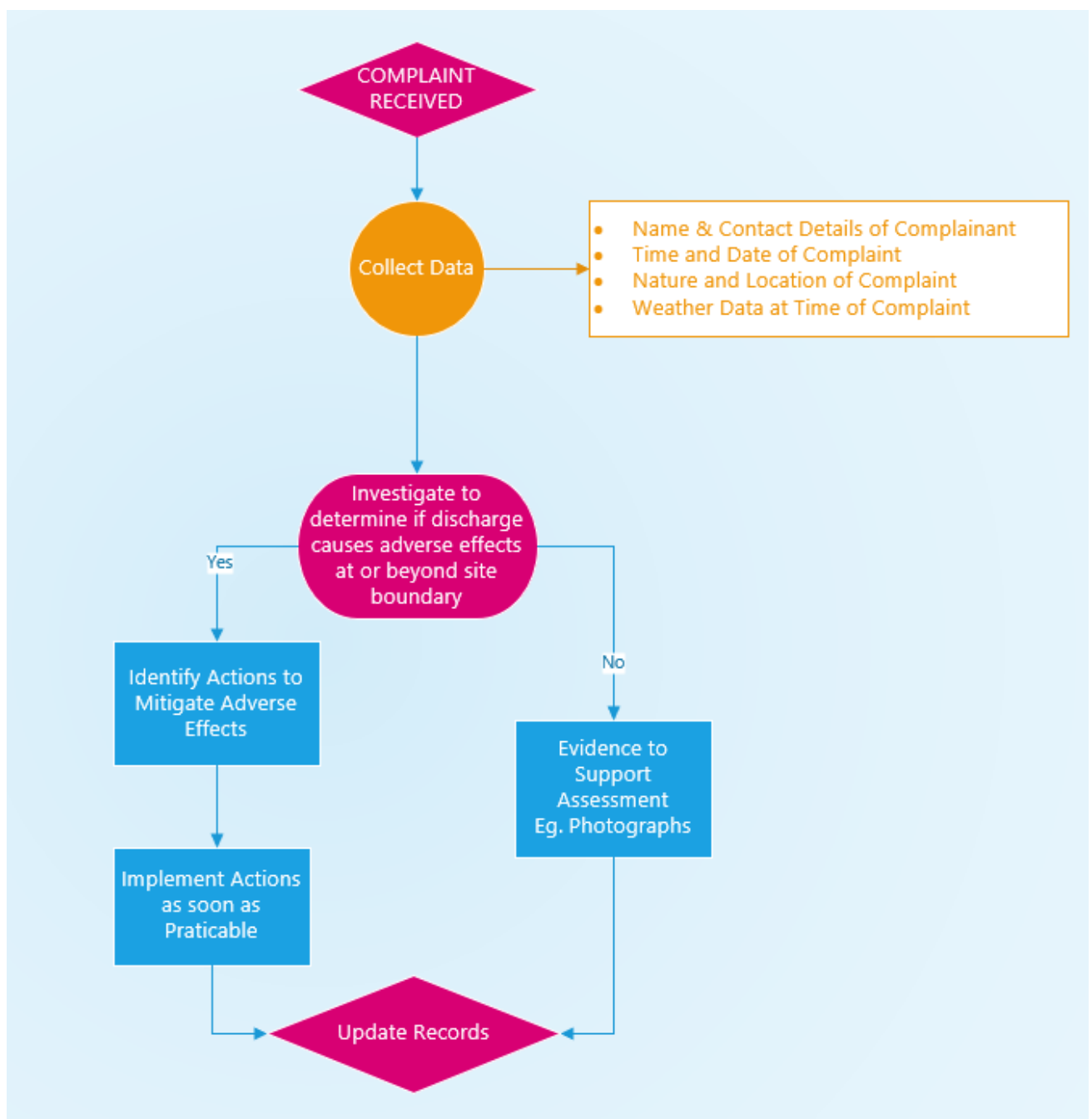


Figure 7-1: Flow Chart of Complaint Procedure

Table 7-1: Example Complaint Log

Date and Time Complaint Received	Complainants contact information	Nature of Complaint (including location, duration and effects observed)	Weather Conditions	Complaint Investigation (What was done?)	Corrective and Future Actions (if appropriate)	Response to Complainant and CODC (date and nature of response)
Complaint received: CODC advised:	Name: Address: Ph:		Wind Direction: Wind Speed: Rain: Y/N Other:			
Complaint received: CODC advised:	Name: Address: Ph:		Wind Direction: Wind Speed: Rain: Y/N Other:			
Complaint received: CODC advised:	Name: Address: Ph:		Wind Direction: Wind Speed: Rain: Y/N Other:			
Complaint received: CODC advised:	Name: Address: Ph:		Wind Direction: Wind Speed: Rain: Y/N Other:			