

# Appendix L

**ACHAR Addendum: Additional Test  
Excavation**



## **ACHAR ADDENDUM**

### **ADDITIONAL TEST EXCAVATION**

### **MOSS VALE PLASTICS RECYCLING AND REPROCESSING FACILITY**

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## 1 BACKGROUND

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OzArk Environment & Heritage (OzArk) has been engaged by GHD, on behalf of Plasrefine Recycling Pty Ltd (the proponent) to complete an Aboriginal Cultural Heritage Assessment Report (ACHAR) of 74-76 Beaconsfield Road, Moss Vale (Lots 10 and 11 DP1084421) which has the potential to be impacted by the proposed Moss Vale Plastics Recycling Facility (the proposal).

The archaeological investigation for the proposal was started by Biosis Pty Ltd which included initiating the *Aboriginal cultural heritage consultation requirements for proponents* (ACHCRs), undertaking survey of the study area following the *Code of Practice for Archaeological Investigation of Aboriginal objects in NSW* (Code of Practice), and preparing an Archaeological Technical Report (ATR) for the proposal following the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW*.

At the conclusion of the survey, Biosis identified three potential archaeological deposits (PADs). As the ATR recommended test excavation within these PADs to better understand their archaeological nature, the proponent engaged OzArk to undertake the test excavation program and to prepare the ACHAR.

The initial test excavation program was undertaken from 3–6 August 2021 and investigated PAD2 and PAD3 because, at the time, PAD1 was not going to be impacted by the proposal and no subsurface investigation occurred at this PAD.

From a total of 48 test units (TUs) (0.5 metres [m] x 0.5 m), across PAD2 and PAD3, nine artefacts were recorded. This equates to 0.75 artefacts per square metre; a very low artefact density and representative of a background scatter of artefacts that would be found in most comparable landscapes across the region.

On 21 September 2021 a draft of the ACHAR which documented the results of the Biosis survey and the OzArk test excavation program was sent to all Registered Aboriginal Parties (RAPs) and the ACHAR was finalised in October 2021.

However, the proponent is now proposing a preferred road access option which would impact PAD1 and therefore has engaged OzArk to carry out subsurface investigations within PAD1 to better understand the archaeological potential of this area.

This memorandum is an addendum to the 2021 ACHAR and reports the results of this additional test excavation.

## 2 CONSULTATION FOR THE ADDITIONAL TEST EXCAVATION

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All RAPs for the project were sent a project update letter on 3 November 2022. This update letter informed RAPs of the proponent's intention to impact PAD1 and OzArk's intention to undertake additional test excavation within the potential archaeological deposit (PAD).

The update letter identified the location of PAD1 and the location of the proposed test excavation. The letter stated that the additional test excavation would follow the methodology set out in the test excavation methodology for PADs 2 and 3 that RAPs received in a project update letter on 13 July 2021.

In accordance with the ACHCRs, RAPs were provided with 28 days to provide comment on the proposed additional test excavation (comments closed on 2 December 2022). During this period, a response was received from the Wodi Wodi Traditional Owner group enquiring about fieldwork (18 November 2022) and from Duncan Falk on 27 November 2022 who indicated that he did not have any issues with the proposed methodology while enquiring about fieldwork allocations.

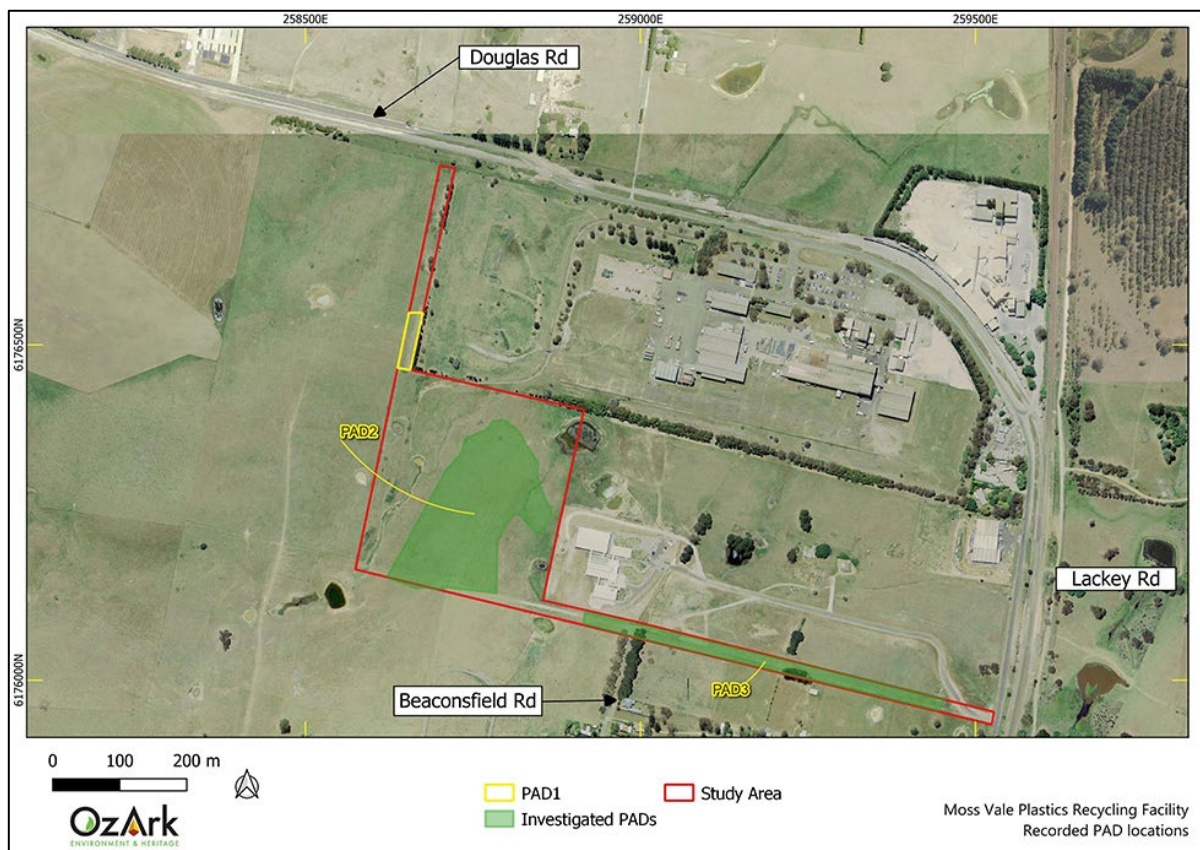
As per Requirement 15c of the Code of Practice, Heritage NSW were informed of the additional test excavation on 24 November 2022.

### 3 PAD1

PAD1 covers an area of 85 x 20 m (**Figure 3-1**). This area was assessed by Biosis in June 2021 who recorded PAD1 in the north-south road access corridor that the proponent now intends to use. PAD1 is described as *located on a crest of a gentle sloping hill spur leading down to the flats surrounding a creekline. Previous assessments undertaken in the local area have identified artefacts on the surface of similar landforms and there is moderate potential subsurface artefacts may be present at this location.*

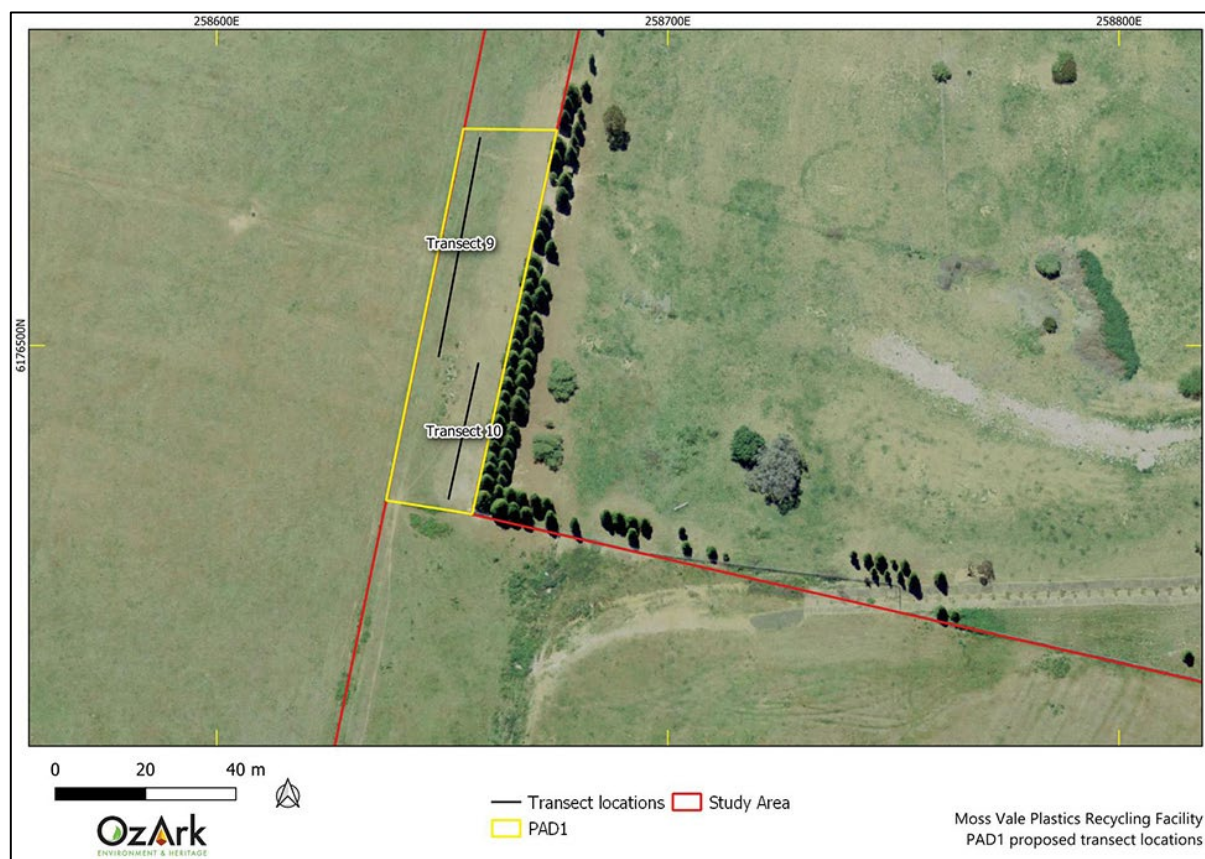
The project update letter stated that the test excavation methodology at PAD1 was to investigate two transects: Transect 9 in the north of PAD1 that will extend for 50 m and contain six TUs spaced 10 m apart and Transect 10 in the south of PAD1 that will extend for 30 m and consist of four TUs spaced 10 m apart (**Figure 3-2**). Each test unit will be 50 x 50 centimetres (cm) in size.

**Figure 3-1: Location of PAD1.**





**Figure 3-2: Location of proposed transects within PAD1 sent with the project update letter.**



#### 4 ADDITIONAL TEST EXCAVATION AT PAD1

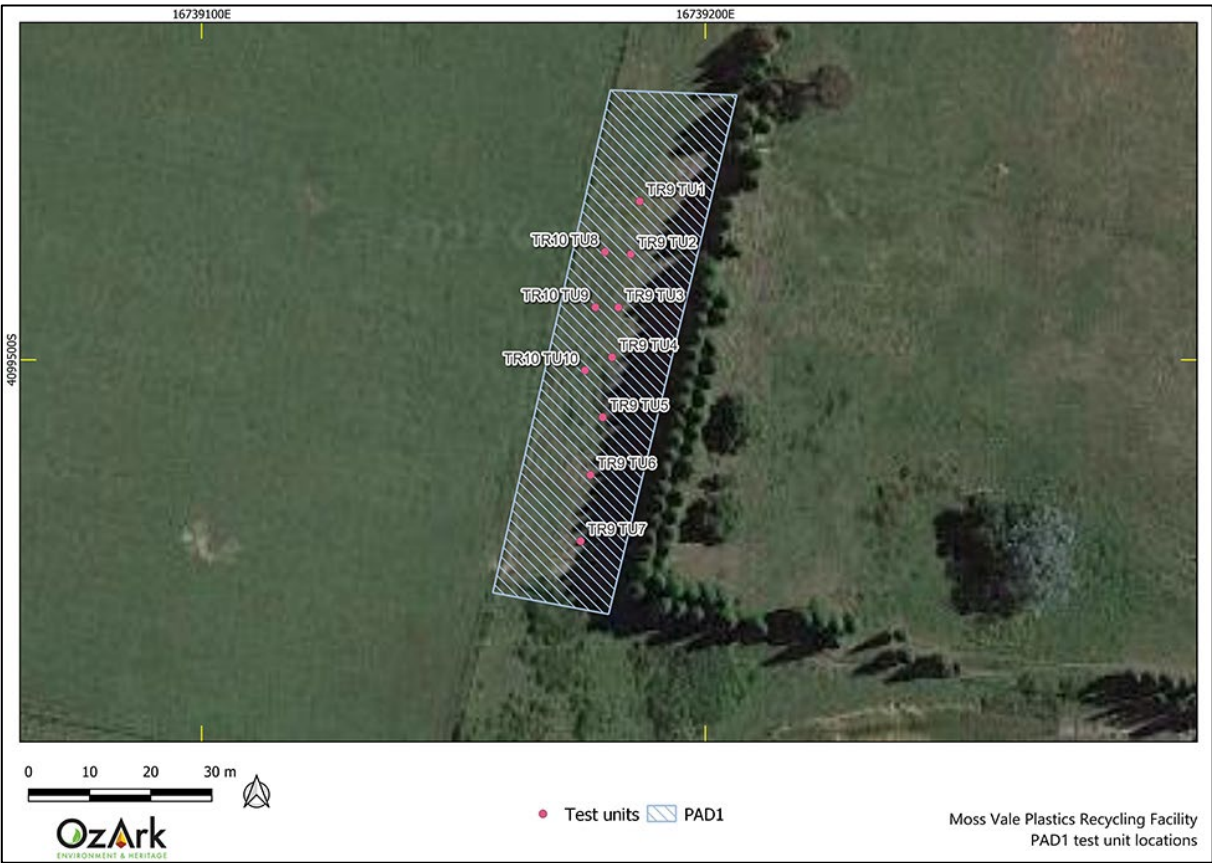
The excavation at PAD1 took place on 13 December 2022. The excavations were directed by Ben Churcher (OzArk Principal Archaeologist) and assisted by Stephanie Rusden (OzArk Senior Archaeologist). Two representatives of the RAPs assisted with the excavation:

- James Davis
- Tyron Pal.

Duncan Falk was invited to attend but was unable to attend on the day.

As stated in the methodology, ten TUs were excavated during one day of excavation. However, rather than six TUs in one transect and four TUs in a second as stated in the methodology (**Figure 3-2**), examination on the ground at PAD1 determined that a more suitable layout was seven TUs along Transect 9 (that extended for 60 m) and three TUs along Transect 10 (that extended for 20 m). All TUs were spaced 10 m apart along transects and Transect 10 was placed 5 m to the west of Transect 9 (**Figure 4-1**). The location of Transect 10 was determined by recordings of artefacts in TU2 and TU3 in Transect 9 and Transect 10 was placed parallel to TU2 and TU3 in Transect 9 to investigate whether the recorded artefacts were part of a larger concentration of artefacts.

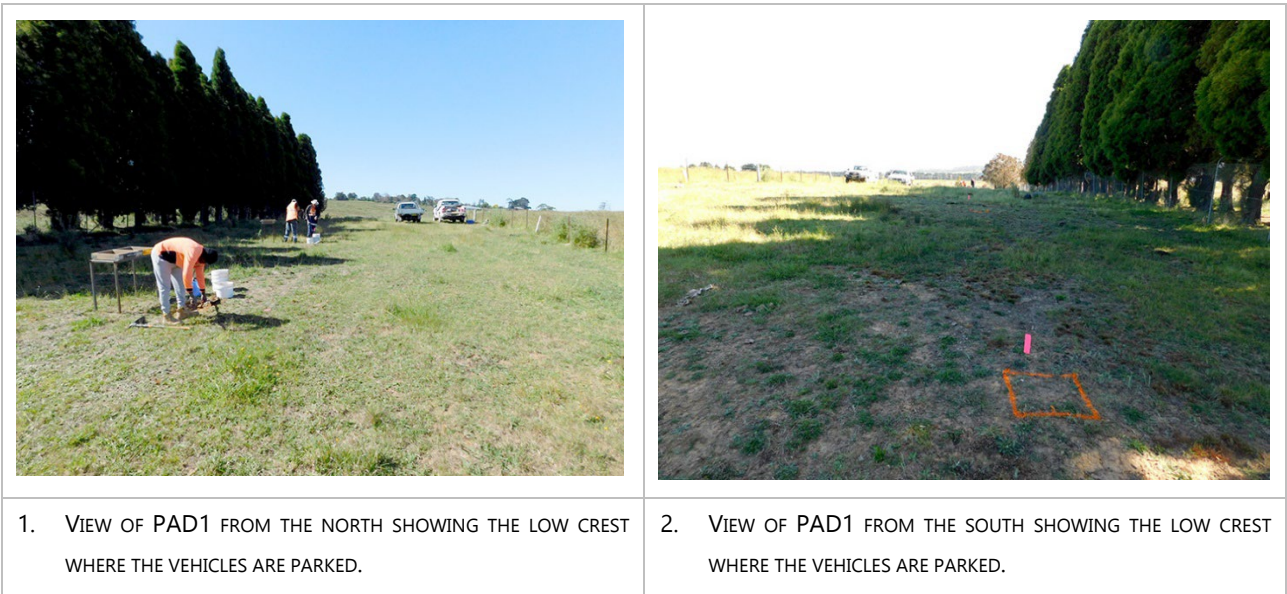
Figure 4-1: Location of excavated TUs within PAD1.



5 EXCAVATION RESULTS

PAD1 is within a simple slope with a gentle gradient that overlooks an ephemeral drainage line located 40m to the east. There is a low crest within the middle of PAD1 and the landform descends both to the north and south of this localised crest (**Figure 5-1**). PAD1 has been completely cleared of upper stratum vegetation and has been used for long-term grazing activities. Impacts from cattle treadage were widespread across the PAD.

Figure 5-1: Views of PAD1.



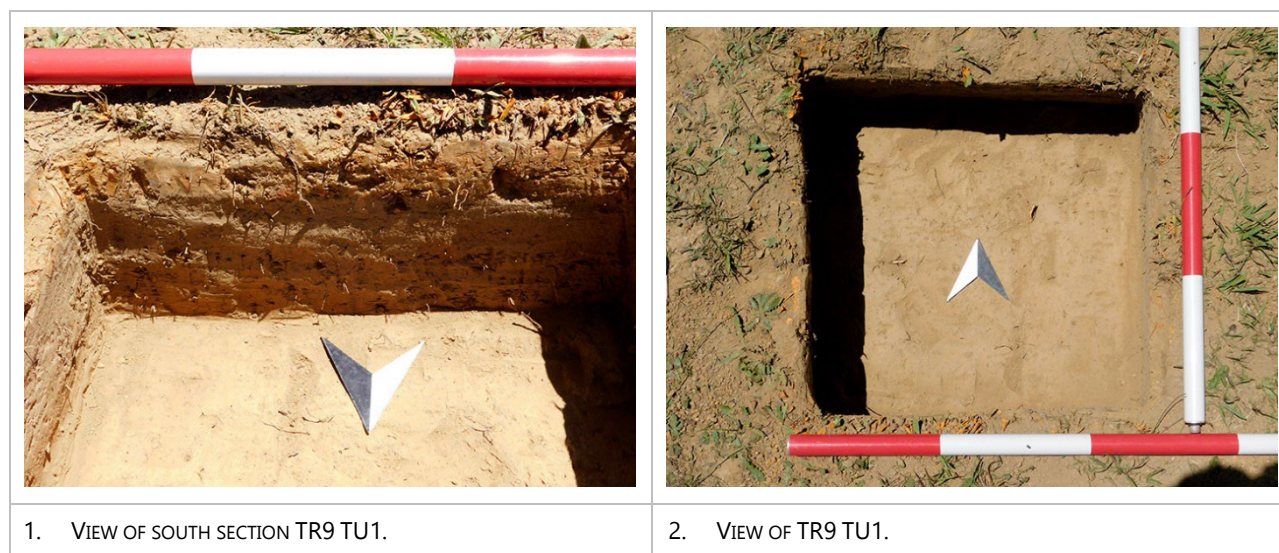


Ten TUs were excavated to culturally sterile soil layers, in this case, an orangey clay with gravels. No archaeological stratigraphy or archaeological features were recorded at any of the TUs. Specific details of the soil profile at each TU are shown in **Table 5-1** and views of the excavated TUs are shown on **Figure 5-2**.

**Table 5-1: Soil profiles in the excavated TUs.**

TU	Soil profile
TR9 TU1	Orange clay wash to 6 cm; pale brown clay loam to 20 cm; pale orange clay at 25 cm
TR9 TU2	Pale brown topsoil to 12 cm; pale orange A2 horizon to 40 cm; pale orange clay with gravels at 40 cm
TR9 TU3	Pale brown topsoil to 10 cm; pale orange A2 horizon to 30 cm; pale orange clay with gravels at 30 cm
TR9 TU4	Pale brown topsoil to 7 cm; pale orange A2 horizon with orange clay chunks to 24 cm; pale orange clay with gravels at 24 cm
TR9 TU5	Pale brown topsoil to 14 cm; pale orange A2 horizon to 25 cm; smooth orange clay at 30 cm
TR9 TU6	Pale brown topsoil to 15 cm; mottled orange clay to 27 cm; pale orange clay with gravels at 27 cm
TR9 TU7	Orange clay wash to 7 cm; pale brown A2 horizon to 19 cm; pale orange clay with gravels at 26 cm
TR10 TU8	Orange clay wash to 10 cm; mid-brown silty A2 horizon to 25 cm; pale orange clay with gravels at 25 cm
TR10 TU9	Mid-brown silty to 19 cm; pale orange clay with gravels at 28 cm
TR10 TU10	Orange clay wash to 5 cm; mid-brown A2 horizon to 19 cm; pale orange clay with gravels at 30 cm

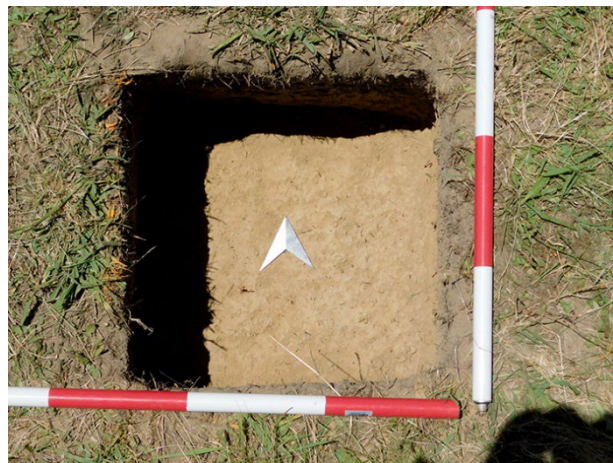
**Figure 5-2: Views of the excavated TUs.**







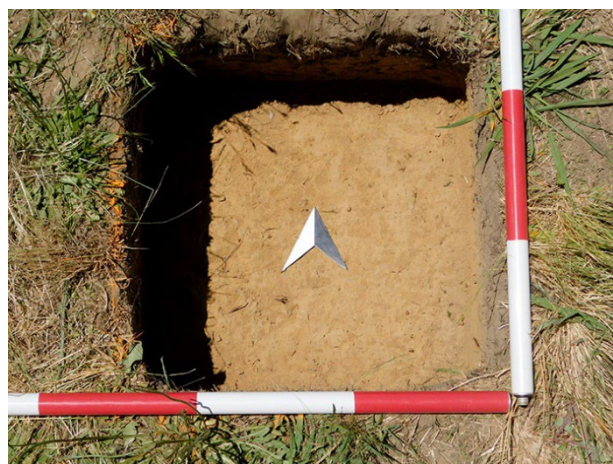
3. VIEW OF SOUTH SECTION TR9 TU2.



4. VIEW OF TR9 TU2.



5. VIEW OF SOUTH SECTION TR9 TU3.



6. VIEW OF TR9 TU3.



7. VIEW OF SOUTH SECTION TR9 TU4.

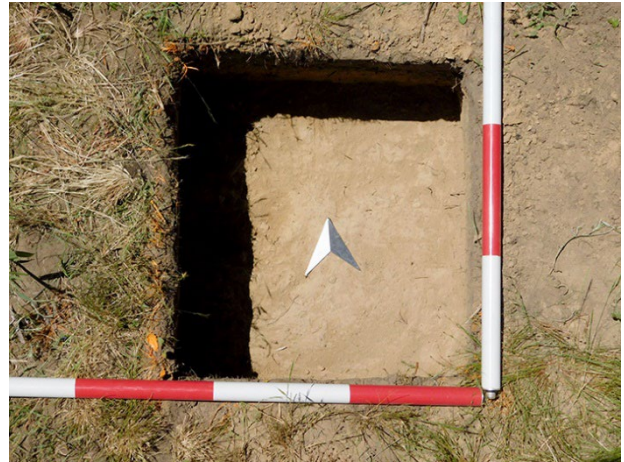


8. VIEW OF TR9 TU4.





9. VIEW OF EAST SECTION TR9 TU5.



10. VIEW OF TR9 TU5.



11. VIEW OF EAST SECTION TR9 TU6.



12. VIEW OF TR9 TU6.



13. VIEW OF EAST SECTION TR9 TU7.



14. VIEW OF TR9 TU7.





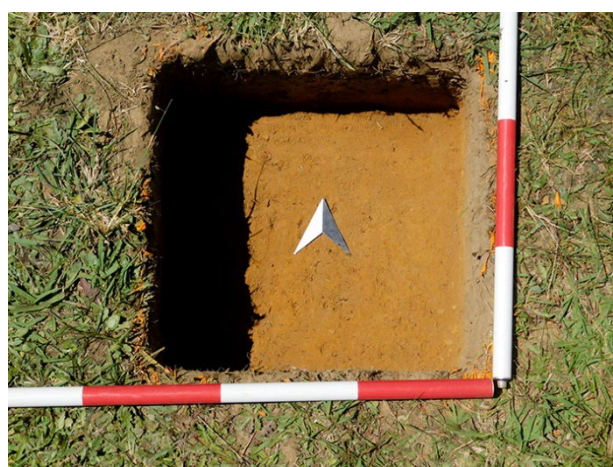
15. VIEW OF EAST SECTION TR10 TU8.



16. VIEW OF TR10 TU8.



17. VIEW OF EAST SECTION TR10 TU9.



18. VIEW OF TR10 TU9.



19. VIEW OF EAST SECTION TR10 TU10.



20. VIEW OF TR10 TU10.

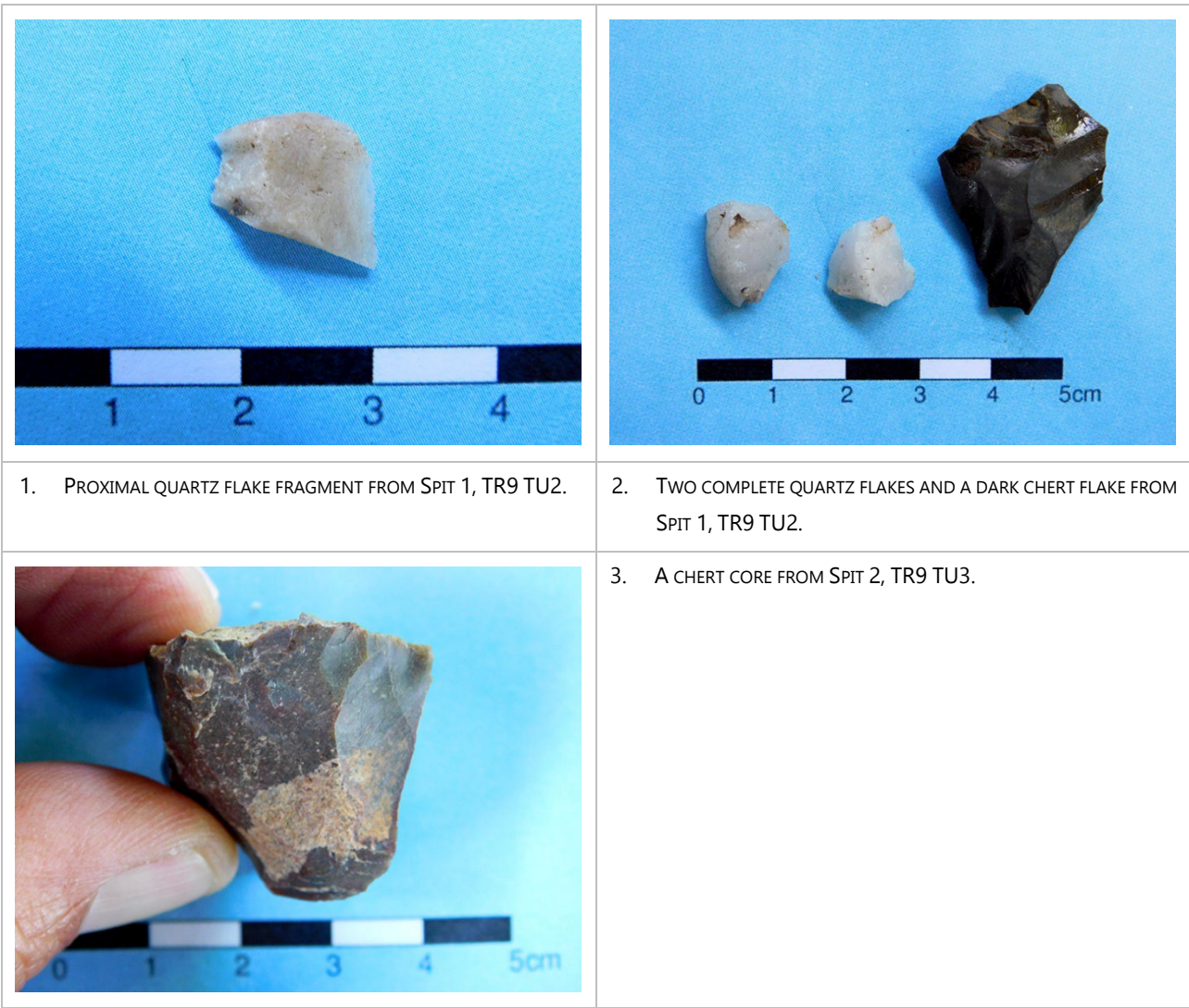


The additional test excavation recorded five artefacts. Details of the recorded artefacts are shown in **Table 5-2** and photographs of the artefacts are shown on **Figure 5-3**.

**Table 5-2: Details of the recorded artefacts.**

TU	Artefact description
TR9 TU2	Quartz flake. Spit 1 (0–10 cm); proximal fragment; 13 millimetres (mm) (length) x 14 mm (width) x 6 mm (depth); tertiary stage of reduction
TR9 TU2	Quartz flake. Spit 1 (0–10 cm); complete; 15 mm (length) x 12 mm (width) x 7 mm (depth); tertiary stage of reduction
TR9 TU2	Quartz flake. Spit 1 (0–10 cm); complete; 12 mm (length) x 14 mm (width) x 5 mm (depth); tertiary stage of reduction
TR9 TU2	Dark chert flake. Spit 1 (0–10 cm); complete; 29 mm (length) x 21 mm (width) x 6 mm (depth); tertiary stage of reduction
TR9 TU3	Chert core. Spit 2 (10–20 cm); Maximum dimensions: 35 mm; unidirectional from a single platform; no cortex, seven previous flake scars

**Figure 5-3: Photographs of the recorded artefacts.**



Like the investigations at PAD2 and PAD3 in 2021, this low artefact density is representative of a background scatter of artefacts that would be found in most comparable landscapes across the region.

The results indicate that the ephemeral drainage line near PAD1 attracted a low level of camping activities, although the low artefact density does not allow any meaningful analysis of Aboriginal use and occupation of the area.

As artefacts were recorded at PAD1, the area surrounding TR9 TU2 and TU3 will be registered with the Aboriginal Heritage Information Management System (AHIMS) as Douglas Rd OS-1 (**Figure 5-4**). The centroid of Douglas Rd OS-1 is GDA Zone 56 258658E; 6176517N. The site extends for 14 m (north–south) by 4 m (east–west).

As the test excavation has removed the recorded artefacts from Douglas Rd OS-1 there are no further known artefacts at the site. Therefore, the site no longer has scientific significance.

**Figure 5-4: Location of Douglas Rd OS-1.**



## 6 MANAGEMENT OF DOUGLAS RD OS-1

Following project approval, an Aboriginal Cultural Heritage Management Plan (ACHMP) will be developed in consultation with the RAPs and approved by the Department of Planning and Environment.

The ACHMP will contain policies for unexpected finds, including the unlikely event that human skeletal material is uncovered.

The following management principles will be applied to the one site recorded because of the additional test excavation program (Douglas Rd OS-1) that is liable to be harmed by the proposal:

- No further archaeological investigation is required at this site as the test excavation program has demonstrated that the site has a low ability to provide further information on past Aboriginal use of the area
- The artefacts from the site recorded during the additional test excavation program should be re-buried with any other artefacts collected within the study area because of the previous test excavation program and any artefacts recovered from the community collection of surface artefacts following project approval.

The ACHMP will state that if Douglas Rd OS-1 is impacted by the proposal that an Aboriginal Site Impact Recording Form is submitted to the Aboriginal Heritage Information Management System (AHIMS) register to list the site as 'destroyed'.

The re-burial location should be registered as a site with the AHIMS register and the proponent will undertake to protect that location.

## **7 RECOMMENDATIONS**

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The following recommendations combine the recommendations contained in the ACHAR with the results of the additional test excavation program.

Under Section 89A of the NPW Act it is mandatory that all newly recorded Aboriginal sites be registered with AHIMS. As a professional in the field of cultural heritage management it is the responsibility of OzArk to ensure this process is undertaken.

To this end it is noted that eight Aboriginal sites are known to exist within the project area (four recorded due to the assessment associated with the 2021 ACHAR, one from the 2022 additional test excavation, and three previously recorded). As five of these sites were recorded because of the test excavation program and represent low density subsurface artefact scatters, no further management is required as the sites have very limited ability to provide further information on past Aboriginal use of the area.

The following recommendations are made based on these impacts and regarding:

- Legal requirements under the terms of the NPW Act whereby it is illegal to damage, deface or destroy an Aboriginal place or object without the prior written consent of Heritage NSW or an approved ACHMP
- The findings of the current investigations undertaken within the study area
- The interests of the Aboriginal community.

Recommendations concerning Aboriginal cultural values within the study area are as follows. These recommendations include those provided in the 2021 ACHAR.



1. Following project approval, an ACHMP will be developed to manage Aboriginal cultural heritage within the study area. The ACHMP will be developed in consultation with the RAPs.
2. The proposed change to the preferred access road to the north–south option will mean that the protection measures for Beaconsfield IF-1, as set out in the ACHAR, will not be required.
3. If the east–west access road option is utilised, harm to Beaconsfield Rd IF-1 must be avoided. To achieve this, during the construction of the access road, the northern boundary of the study area adjacent to Beaconsfield Rd IF-1 should be temporarily fenced and signed (see **Figure 7-3** in the ACHAR for the location of the site). There should be no vehicle movements or the storage of materials to the north of this fence during the construction activities. The fence may be removed at the conclusion of the construction associated with the proposal.
4. The impact footprint of the proposal should be temporarily fenced during construction to ensure that there are no inadvertent impacts to surrounding landforms. The fence may be removed at the conclusion of the construction associated with the proposal.
5. An attempt will be made to locate the isolated finds MVRec IF1, BR IF1, and BR IF2 before the start of construction. This should be undertaken with the assistance of the Aboriginal community and all visible artefacts should be collected.
6. No further archaeological investigation is required at Douglas Rd OS-1, Beaconsfield Rd OS-1, Beaconsfield Rd OS-2, Beaconsfield Rd IF-2, and Beaconsfield Rd IF-3 as the test excavation program has demonstrated that the sites have a low ability to provide further information on past Aboriginal use of the area.
7. The artefacts from the sites recorded during the test excavation program should be re-buried with any other artefacts collected within the study area. The way they are reburied, and the location of the reburial will be set out in the ACHMP.
8. The ACHMP will provide policies for unexpected finds, including human skeletal material.