

Heritage Management Plan

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Contents

1	Introduction	4
1.1	Overview of approved operations	4
1.2	Baseline data	4
1.3	Purpose	6
1.4	Scope	6
1.5	Management systems	6
2	Legislative Requirements	7
2.1	The project requirements	7
2.2	Biodiversity offset area	7
2.3	Aboriginal Heritage Conservation Strategy (AHCS)	7
2.4	Author of Revised HMP	7
2.5	HMP Review	7
3	Consultation and Communication	8
4	Risk Management	9
5	Control Measures	10
5.1	Overview of operation controls	10
5.2	Key Operational Control Procedures	11
6	Monitoring Program	13
7	Roles & Responsibilities	14
8	Compliance Obligations	16
8.1	Protocols for non-compliance notification	16
8.2	Incident Notification	16
8.3	Complaint Handling	16
9	Reporting and Review	17
9.1	Reporting	17
9.2	HMP Review	17
9.3	Independent Audit	17
10	References	18
	Version Control	19
	Figure 1: Extant Aboriginal Heritage sites	20
	Appendix 1: Project approval 11_0047 conditions	21
	Appendix 2: Registered Aboriginal Parties and Historic Stakeholders	22
	Appendix 3: Ongoing Consultation Commitments	23
	A-3.1 Ongoing Consultation of Aboriginal Stakeholders (RAPs)	23
	A-3.2 Ongoing Consultation of Historic Heritage Stakeholders	23
	Appendix 4: Management of Aboriginal Cultural Heritage Sites	24
	A-4.1 Protective Fencing and Signage	24
	A-4.2 Cultural Heritage Fencing Audit	24
	A-4.3 Potential Impacts from Weed and Feral Animal Management	24
	A-4.4 Exemptions for Emergency Vegetation Management	25
	A-4.5 Aboriginal Community Access	25
	A-4.6 Potential Indirect Impacts - Blasting	25
	Appendix 5: Management of Salvaged Artefacts and Sites	26
	A-5.1 Impacts to Known Aboriginal Cultural Heritage Sites	26

A-5.2	Surface Collection Methodology	26
A-5.3	Aboriginal and Cultural Heritage Signoff	26
A-5.4	Post-Salvage Analyses	27
A-5.5	Salvage Reporting	27
A-5.6	Pre-Disturbance Archaeological Clearance	27
A-5.7	Aboriginal Site Impact Record Forms	28
A-5.8	Artefact Curation and Aboriginal Keeping Place	28
A-5.9	Scarred tree removal	28
	Appendix 6: Contingencies and Protocols	31
A-6.1	Land Disturbance Permits	31
A-6.2	Procedure for the Discovery of Human Remains	31
A-6.3	Procedure for the Discovery of Aboriginal Objects	31
A-6.4	Procedure for Suspected Damage to Known Aboriginal Cultural Heritage Sites	32
A-6.5	Procedure for Previously Unidentified Historic Heritage Sites	32

1 Introduction

1.1 Overview of approved operations

The Tarrawonga Coal Mine (TCM) is an open cut mining operation located approximately 15 kilometres north-east of Boggabri and 42 kilometres north-northwest of Gunnedah in New South Wales. The mine is owned and operated by Whitehaven Coal Mining Pty Ltd (Whitehaven).

The TCM commenced operations in 2006 and has approval to produce up to 3.5 million tonnes per annum of run-of-mine (ROM) coal via conventional open cut mining methods until the end of 2030. Sized coal produced on-site is transported via road to the Whitehaven coal handling and preparation plant located to the north of Gunnedah prior to being railed to the port of Newcastle via the Werris Creek Mungindi Railway. The operation of a mine has potential to impact cultural heritage (hereto reference to 'cultural heritage' includes both aboriginal and historic, unless specified otherwise) within the project boundary.

TCM operates under project approval MP 11_0047 (granted 22 January 2013), inclusive of multiple modifications since this date. Further details on each modification can be found in the 'Definition' section of Project Approval (MP 11_0047).

A full project description, including baseline data, history of operations, current operating approach and mining methods are outlined within the TCM Project Environmental Assessment and previous Annual Environmental Management Reports/Annual Reviews (AEMR/Annual Review) for the site. These documents can be found on the Whitehaven Coal website, see link within section 3 of this document.

1.2 Baseline data

The baseline data is sourced from several Aboriginal cultural heritage assessments undertaken as part of the development and operation of the TCM: *Archaeological Surveys and Reports (2005)*; *Landscape (2010)*; *Kayandel (2011)*; *Dunk and Vermeltfoort (2011)*; and *Whincop (2019)*. Searches of relevant heritage registers for the TCM Project Boundary was undertaken as part of the revision of this HMP, including the Aboriginal Heritage Information Management System (AHIMS) database (Search ID 913298, undertaken on 24 July 2024), NSW State Heritage Inventory, and the Australian Heritage Register. No entries for historic heritage sites were identified within the relevant registers. The results of the AHIMS search indicate that a total of 109 Aboriginal cultural heritage sites are located within the TCM Project Boundary, of which many have been salvaged and therefore not included in this HMP. The total (109) includes nine AHIMS records for Scarred Trees that are currently being reassessed as not being an Aboriginal cultural heritage site. As a result, the Project Boundary contains 58 extant Aboriginal cultural heritage sites (Figure 1), including:

- 33 artefacts scatters;
- 23 isolated artefacts;
- 1 grinding groove site;
- 1 restricted site (information must be requested from AHIMS directly).

Summary descriptions of the 58 extant Aboriginal cultural heritage sites identified are in Table 1. Refer to Figure 1 for the map of extant heritage sites.

Table 1 Aboriginal Heritage sites identified and protected within TCM Project boundary

AHIMS ID	Site Name	Easting MGA 1994	Northing MGA 1994	Site Type
20-4-0114	BC20	227531	6608729	Isolated artefact*
20-4-0157	GGOS1	228604	6605280	Artefact Scatter
20-4-0158	GGOS2	228450	6604477	Artefact Scatter
20-4-0159	GGOS 3	228402	6604442	Artefact Scatter
20-4-0160	GGOS4	228440	6604352	Artefact Scatter
20-4-0198	Restriction applied.			

AHIMS ID	Site Name	Easting MGA 1994	Northing MGA 1994	Site Type
20-4-0199	BCD 2	225900	6606697	Artefact Scatter
20-4-0200	BCD 3	226322	6606222	Isolated artefact
20-4-0297	TCEP-IF-016	230909	6607039	Artefact Scatter
20-4-0305	TCEP-IF-004	227590	6605116	Isolated artefact
20-4-0307	TCEP-IF-006	227063	6605159	Isolated artefact
20-4-0310	TCEP-IF-009	231339	6607583	Isolated artefact
20-4-0314	TCEP-IF-020	230950	6606068	Artefact Scatter
20-4-0317	TCEP-IF-023	229205	6605789	Isolated artefact
20-4-0318	TCEP-IF-024	231021	6606355	Isolated artefact
20-4-0319	TCEP-IF-025	228896	6605473	Isolated artefact
20-4-0320	TCEP-IF-026	228277	6604964	Isolated artefact
20-4-0321	TCEP-IF-027	227652	6605232	Isolated artefact
20-4-0328	TCEP-OS-007	231309	6607856	Artefact Scatter
20-4-0329	TCEP-OS-008	231199	6607594	Artefact Scatter
20-4-0330	TCEP-OS-009	231084	6607415	Artefact Scatter
20-4-0331	TCEP-OS-010	231239	6607304	Artefact Scatter
20-4-0333	TCEP-OS-012	231039	6607183	Artefact Scatter
20-4-0334	TCEP-OS-013	231170	6607115	Artefact Scatter
20-4-0336	TCEP-OS-015	230902	6606931	Artefact Scatter
20-4-0337	TCEP-OS-016	230314	6605906	Artefact Scatter
20-4-0338	TCEP-OS-017	229714	6606080	Artefact Scatter
20-4-0339	TCEP-OS-018	229384	6605975	Artefact Scatter
20-4-0340	TCEP-OS-019	228763	6605354	Artefact Scatter
20-4-0425	T9/1	231291	6606581	Artefact Scatter
20-4-0433	T9/5	231537	6606001	Artefact Scatter
20-4-0434	T9/6	231751	6607129	Artefact Scatter
20-4-0435	T9/2	231331	6606532	Isolated artefact
20-4-0436	T9/3	231648	6606698	Isolated artefact
20-4-0437	T9/4	231594	6606326	Artefact Scatter
20-4-0438	T9/7	231747	6607214	Artefact Scatter
20-4-0465	T15/1	231375	6607678	Artefact Scatter
20-4-0604	VEP IA 16	225058	6606658	Isolated artefact
20-4-0605	VEP IA 15	227837	6604109	Isolated artefact
20-4-0606	VEP IA 14	227663	6604101	Isolated artefact
20-4-0662	VEP IA 13	227923	6603602	Isolated artefact
20-4-0669	VEP AS 11	227519	6604187	Artefact Scatter
20-4-0670	VEP AS 12	227745	6604187	Artefact Scatter
20-4-0675	VEP AS 09	228454	6602961	Artefact Scatter
20-4-0682	VEP AS 10	227467	6603959	Artefact Scatter
20-4-0826	TCEP-OS-021	231292	6607423	Artefact Scatter
20-4-0873	Tarrawonga GG1	227811	6607058	Grinding Grooves
20-4-0874	Tarrawonga LOM IA2	228476	6604606	Isolated artefact
20-4-0875	Tarrawonga LOM IA1	228534	6604919	Isolated artefact

AHIMS ID	Site Name	Easting MGA 1994	Northing MGA 1994	Site Type
20-4-0876	Tarrawonga LOM AS1	228544	6605273	Artefact Scatter
20-4-0883	Tarrawonga IA4	230838	6607002	Isolated artefact
20-4-0884	Tarrawonga IA5	227845	6603690	Isolated artefact
20-4-0885	Bollol Creek IA1	230924	6606201	Isolated artefact
20-4-0886	Bollol Creek AS1	231457	6606845	Artefact Scatter
20-4-0887	Bollol Creek AS2	231110	6606723	Artefact Scatter
20-4-0968	Tarrawonga AS5	230986	6606986	Artefact Scatter
20-4-0971	Bollol Creek IA2	230895	6606571	Isolated artefact
20-4-0972	Tarrawonga IA8	231055	6606927	Isolated artefact

* This site is located in an area that has been impacted, and has likely been destroyed. The status in AHIMS needs to be updated.

1.3 Purpose

The purpose of this Heritage Management Plan (HMP) is to provide an overview of, and direction to the systems, processes and documentation that have been established to:

- ensure compliance with operating conditions of all active approvals; and
- avoid or minimise the impact of disturbance to cultural heritage places and objects from mining activity.

1.4 Scope

The scope of the HMP applies to all activities at TCM including mining, handling, transport, and storage of coal that have the potential to impact cultural heritage values in the immediate and surrounding receiving environment.

This document should be read in conjunction with other environmental management plans and operational documents (such as procedures). This HMP covers the entirety of the Project Boundary for the Mine. This includes areas within the proposed Disturbance Boundary and mine infrastructure area, as well as all areas outside the Disturbance Boundary but within the Project Boundary (i.e. the Mining Lease).

1.5 Management systems

The TCM; as a Whitehaven operation, has well-established management systems that are aligned with the international management system standard ISO 14001 (ISO, 2015). These management systems provide the framework to support the planning, implementation, monitoring and review process to achieve continual improvement in cultural heritage management. To minimise the disturbance to cultural heritage, a risk-based approach has been established, which includes mechanisms for archaeological pre-clearance surveys, monitoring, providing feedback on the effectiveness of controls, and enabling adaptive cultural heritage management.

2 Legislative Requirements

2.1 The project requirements

Requirements and commitments associated with disturbance to cultural heritage are defined in Tarrawonga Coal Mine Project Approval MP 11_0047 (including modifications) Schedule 3 Condition 52 and Schedule 5 Condition 4,5,8 and 10.

References, guidelines and additional legislation relevant to the preparation of this HMP and the management of disturbance to cultural heritage from the TCM are available in section 10.

This HMP has been developed in accordance with the MP 11_0047 and other relevant conditions, as provided in Appendix 1.

2.2 Biodiversity offset area

The biodiversity offset area ("Willeroi") established for the Tarrawonga extension project was not subject to a cultural heritage assessment, and as such is not covered by the provisions of the Part 3A Project Approval relating to cultural heritage. On this basis, the provisions of the *National Parks and Wildlife Act* (NP&W Act) apply in full at the "Willeroi" property in relation to the protection of items of cultural heritage. Any disturbance activities within the "Willeroi" property will be subject to the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW 2010).

2.3 Aboriginal Heritage Conservation Strategy (AHCS)

The AHCS (UQ Cultural & Heritage Unit, 2017) addresses the potential cumulative impacts of the operation of the Boggabri, Tarrawonga and Maules Creek mine sites, also referred to as the BTM. The AHCS describes the known and potential Aboriginal heritage (archaeological and cultural) values and identifies Aboriginal sites of high archaeological and/or cultural significance with the BTM. The AHCS contains commitments to identify, manage and protect Aboriginal cultural heritage values within the BTM mine sites, and their associated biodiversity offset areas.

The AHCS provides a methodology for identifying and managing potential impacts to cultural heritage within the BTM and associated offsets. It also provides improvement opportunities for the management and enhancement of Aboriginal cultural (intangible) values, based on feedback received from Registered Aboriginal Parties (RAPs) as part of ongoing consultation.

2.4 Author of Revised HMP

The revised HMP has been prepared by a suitably qualified and experienced professional, and has been prepared in consultation with DPE and relevant stakeholders. The revised HMP has been prepared by Dr Matthew Whincop from Whincop Archaeology Pty Ltd (Director), a qualified archaeologist with more than two decades of experience in archaeological research and consultancy. Dr Whincop has authored numerous Cultural Heritage Assessments, Cultural Heritage Management Plans, Heritage Impact Assessments and Due Diligence Assessments in the Boggabri region.

2.5 HMP Review

This HMP has been developed on the basis that it will remain a "live" document. It will be reviewed internally as required; i.e. following completion of the Annual Review, and/or following a heritage related incident, audit, or modification to the conditions of approval. Tarrawonga Coal Pty Ltd (TCPL) shall review and, if necessary, revise the HMP in accordance with condition 5 of Schedule 5 of PA 11_0047 to the satisfaction of the Secretary. Copies of the revised and approved HMP will be made available on Whitehaven's website.

3 Consultation and Communication

This HMP has been prepared in consultation with the Department of Planning and Environment (DPE). In addition, TCM has extensive consultation and communication processes, including but not limited to:

- A comprehensive community engagement program which includes a Community Consultative Committee (CCC);
- Annual consultation with the Registered Aboriginal Parties (RAPs) and historic stakeholders. A list of all identified RAPs and historic stakeholders is provided in Appendix 2. For this HMP and ongoing site works, TCM will consult directly with the RAPs, who may consult with the wider Aboriginal community concerning cultural heritage management matters related to the project;
- Ongoing consultation with relevant government agencies including DPE (formally known as the Department of Planning, Infrastructure and the Environment (or DPIE)), and relevant local councils;
- A community response line (1800 942 836) which enables members of the community to contact environment and community staff directly to discuss cultural heritage concerns; and,
- Publicly available project approvals, environmental and other related documentation (annual reports, complaints register, CCC minutes) via the Whitehaven Coal website (<https://whitehavencoal.com.au/our-business/our-assets/tarrawonga-mine/>).

4 Risk Management

The TCM implements a comprehensive risk management system as documented in the Whitehaven Coal HSE Risk Management Standard (WHC-STD-HSE Risk Management) and the Whitehaven Coal HSE Risk Management Procedure (WHC-PRO-HSE Risk Management). Disturbance of cultural heritage and associated control measures are documented in the TCM Broadbrush Risk Assessment; the control measures are summarised in section 5 of this HMP. Operational and project related changes that have the potential to materially disturb cultural heritage are managed through the Whitehaven Coal Management of Change Standard (WHC-STD-Management of Change).

5 Control Measures

5.1 Overview of operation controls

The Project Approval requires the TCM to implement reasonable and foreseeable avoidance and mitigation measures' regarding disturbance to Indigenous and non-Indigenous heritage. Key operational control measures are included in Table 2.

Table 2 Control measures

Risk	Source	Mitigation Measures	Responsibility	Timing
Reputational damage from disturbing cultural heritage	Areas disturbed by mining activity (surface disturbance)	Annual consultation with RAPs and historic stakeholders as per Appendix 2, 3, 4 and 6.	Environmental Superintendent or delegate	Annually, as needed basis
Potential for known and previously unknown Aboriginal objects or historic relics to be potentially damaged during operations.	Known or newly identified sites to be impacted through operational activities within the mining lease	Implement Appendix 5: Management of Salvaged Artefacts and Sites and WHC-PRO-GOC-CLEARING OPERATIONS including: - Surface collection of artefacts, post collection analysis and salvage reporting - Predisturbance archaeological clearance (Permit to Disturb) required within Land Disturbance Protocol (LDP) (WHC-OC-PRO-LAND DISTURBANCE PROTOCOL) - Aboriginal site data collection - Artefact curation and aboriginal keeping place - Subsurface test excavation	Operations Manager - Tarrawonga	Ongoing
		Site familiarization/ induction for all personnel working on the Mine. The inductions will include a component on the Aboriginal and historic heritage sites within the Project Boundary. It will include cultural heritage: obligations, control measures and potential fines under the relevant legislation. Suitable records of these inductions will be kept.	Environmental Superintendent or delegate	Ongoing
		Non-impacted sites will be protected in accordance with the controls in Appendix 4: including: - Protective fencing and signage and annual auditing - Weed and feral animal management - Maintain reasonable access for Aboriginal community	Environmental Superintendent or delegate	Ongoing

Risk	Source	Mitigation Measures	Responsibility	Timing
		If a cultural heritage item is exposed the Procedure for the Discovery of Aboriginal Objects will be implemented as per appendix 6.3. If a cultural heritage item is damaged an incident is raised as per section 8.2 and appendix 6.4 process is followed.		
Damage or disturbance of grinding groove site Tarrawonga GG1 (AHIMS 20-4-0873) inside the Project boundary	Mining activities particularly blasting (vibration, air blast and flyrock)	Tarrawonga GG1 will be protected insitu applying the controls in Appendix 5 such as: - Protective fencing and signage and annual fencing audit - Installation of vibration monitor with protocols for threshold exceedances - Aboriginal community access If the grinding groove is damaged an incident is raised as per section 8.2 and appendix A-6.4 process is followed.	Operations Manager - Tarrawonga	Ongoing
Impact on Aboriginal Cultural (intangible) Values	Biodiversity Offset Area "Willeroi"	Apply Aboriginal Cultural Heritage Strategy (UQ Cultural & Heritage Unit, 2017). Refer to section 2.3 for more details. Many Aboriginal intangible cultural values are managed through management natural biodiversity values. Biodiversity activities are managed through the application of due diligence assessments and the low impact activity defence.	Operations Manager - Tarrawonga	Ongoing

5.2 Key Operational Control Procedures

5.2.1 WHC-PRO-OC-GOC-Clearance Operations

Outlines the clearance procedures for carrying out land disturbance activities that disturb any ground surface. The Procedure covers the legal obligations associated with clearing activities including those relevant to Aboriginal cultural heritage sites and objects, and historic heritage sites and relics. The Procedure requires that before any clearing activity is to take place, a qualified archaeologist and RAP visit the site and survey any proposed clearing areas to ensure that all Aboriginal objects have been appropriately salvaged. The Procedure also includes the reporting requirements following completion of archaeological salvage.

5.2.2 WHC-PLN-TAR-Biodiversity Management Plan

This plan includes a commitment to manage Aboriginal heritage, at the TCM and Willeroi West Offset area from mining and biodiversity management activities. The BMP requires that all personnel conducting pre-clearing inspections be inducted which covers identification of potential cultural heritage objects (particularly culturally modified trees) and that any potential heritage finds are recorded, included in the Whitehaven cultural heritage database, added to the Whitehaven spatial database, and registered on the AHIMS. It also

requires that an Aboriginal and Cultural Heritage checklist be completed by the Environmental Officer as part of the Land Disturbance Protocol during pre-clearance (see section 4.2.3).

5.2.3 WHC_PRO_TCM_Land Disturbance Protocol

This protocol includes a process for ensuring that clearing work is carried out in accordance with TCM's conditions and commitments (including cultural heritage). It allows personnel to ascertain what internal approvals are required for the planned land disturbance activity and ensures administrative cultural heritage controls are applicable. Finally, this protocol lists all the related protocols, forms and checklists that may be relevant to a land disturbance activity, including an Aboriginal and Cultural Heritage form.

6 Monitoring Program

As per section 4.1, protective fencing and signage at all heritage sites are audited each year to ensure that their condition is maintained. Appendix A-4.1 provides further detail on the annual fencing inspection.

In addition, RAPs are required to carry out inspections of annual clearance areas prior to disturbance (refer to section 4.1).

The grinding grooves are to be subject to blast monitoring when blasts occur within 500meters of the grinding grooves (refer to Appendix A-4.6).

7 Roles & Responsibilities

Table 3 TCM Roles and Responsibilities

Role	Responsibility
HSE Manager (or Equivalent)	Maintenance and update of this plan and monitoring program.
Open Cut Operations and Statutory Open Cut Examiner (OCE)	- Provide required resources and support to implement this plan. - Understand the requirements of the HMP. - Implement operational controls listed in Table 2.
Operations Manager - Tarrawonga	- Ensure personnel are aware of their obligations under this HMP and provide support to the site Environmental Officer in implementing the requirements of the HMP. - Follow relevant procedures in relation to site salvage and identification of artefacts during operational activities. - Report any incidents to the Environmental Superintendent or delegate for immediate action and resolution.
Environmental Superintendent	- Authorise the HMP and any reviews/updates. - Ensure inductions and training are relevant to the requirements of this HMP. - Consult with relevant agencies and stakeholders on the development and implementation of the HMP. - Report any incidents to the relevant agencies.
Environmental Officer	- Undertake on-ground implementation of this HMP. - Coordinate activities in this plan with operational personnel and the RAPs. - Coordinate archaeologists and arborists in the active completion of works required in this plan. - Assess the ongoing effectiveness of this plan and provide feedback to the Group Environment Manager for any revision requirements. - Provide operations with relevant advice and information pertinent to management of cultural heritage issues, including provision of toolbox talks on heritage matters. - Undertake review of site disturbance requirements and coordinate site disturbance approval processes, including review of known heritage sites against areas proposed for disturbance. - Provide input to the AR in relation to performance against the requirements of the HMP and any developments relating to heritage management during the review period. - Coordinate RAPs for site monitoring purposes. - Coordinate with the RAPs any required site monitoring for soil stripping activities. - Respond to any events impacting on cultural heritage in accordance with the procedures in this management plan.
RAPs	Participate in fieldwork as needed (ensuring relevant insurances and Fitness for Work are met)

Role	Responsibility
	• Contribute cultural perspective on newly identified Aboriginal objects • Attend annual RAP consultation meetings
Archaeologist	• Undertake archaeological inspection of proposed works areas • Oversee all archaeological salvage activities • Prepare relevant reporting regarding the results of fieldwork.
All employees	• All employees at TCM share the responsibility of maintaining the Licence to Operate which includes the management of disturbance to cultural heritage and are referenced where applicable in operational control documentation.

8 Compliance Obligations

8.1 Protocols for non-compliance notification

A written report on a non-compliance with required contents will be provided to the DPE via the major projects website within 7 days of becoming aware of the non-compliance (or as otherwise directed by the DPE) as per Schedule 5 Condition 8 PA 11_0047. Appendix 6 includes details on responding to unplanned discovery or damage to cultural heritage items.

8.2 Incident Notification

In accordance with Schedule 5 Condition 8 PA 11_0047, and under Section 148 of the Protection of the Environment Operations Act 1997 (POEO Act) the Secretary of DPE and representatives of all relevant regulatory agencies will be informed of any incident that has caused, or threatens to cause, material harm to the environment (including cultural heritage).

A notification will be provided to the DPE immediately after becoming aware of an incident via the major project's website. A written report on the incident will be provided to the DPE via the major project's website within 7 days and a detailed report with 30 days of becoming aware of the incident (or as otherwise directed by the DPE) as per the requirements of PA 11_0047. Reporting to additional regulatory authorities will be executed to meet legal obligations.

8.3 Complaint Handling

Whilst all endeavours will be made by TCM to avoid adverse disturbance to cultural heritage, it is acknowledged that impacts may occur. To ensure an appropriate and consistent level of reporting, response and follow-up to any complaints is adopted by TCM, the following complaints management protocol will be followed:

- a publicly advertised telephone complaints line will be in place to receive complaints;
- initial response is provided where practical within 24 hours of receipt of a complaint;
- an investigation will be initiated as per for a non-compliance (section 7.2); and
- all details regarding the complaint including investigation outcomes and follow up actions will be documented in a complaints register.

A copy of the Complaints Register will be made available to the CCC and the complainant (on request) and updated monthly on the TCM website. A summary of complaints received every 12 months will be included in the Annual Review.

9 Reporting and Review

9.1 Reporting

9.1.1 Compliance Reporting

An overview of any non-compliances or incidents received during the reporting year are included in TCM's annual review. Refer to section 8.1.3 for further detail on the annual review.

9.1.2 CCC Reporting

A Community Consultative Committee has been established and will continue to be operated for the duration of operations on site. Regular briefings to the CCC will be provided, including a summary of the status of insitu cultural heritage sites.

9.1.3 Annual Review

By the end of March each year, TCM will review the cultural heritage performance for the previous calendar year. The Cultural Heritage component of the Annual Review includes the required detail as per the DPE Annual Review Guideline (2015). The Annual Review will be sent to the relevant regulatory agencies for review and made publicly available on the WHC website.

9.2 HMP Review

This HMP will be reviewed and evaluated to assess its adequacy and effectiveness, to the satisfaction of the Secretary (in consultation with relevant government agencies) in accordance with Condition 4 and 5 of Schedule 5 of MP 11_0047. This requires that this is undertaken within 3 months of:

- a) The submission of the annual review;
- b) The submission of an incident report;
- c) The submission of an audit; and
- d) Any modifications to the conditions of the Approval.

If necessary, the HMP will be revised to incorporate any recommended measures to improve the practices associated with cultural heritage disturbance of TCM resulting from audits, community complaints (Section 7.3) and incident investigation findings (section 7.2). In addition, the review process will include ongoing evaluation of operational modifications, alternative methodologies and recent technologies that become available for their potential to lessen, minimise or avoid disturbance to cultural heritage impacts.

9.3 Independent Audit

In accordance with Schedule 5 Condition 10 MP 11_0047 an Independent Environmental Audit (IEA) of the TCM initially undertaken in 2014 and additional IEAs have been and will continue to be undertaken every three years. The IEA includes a review of the cultural heritage disturbance of the TCM, assess compliance with the requirements in this plan, and implementation of management measures for the potential disturbance to cultural heritage.

10 References

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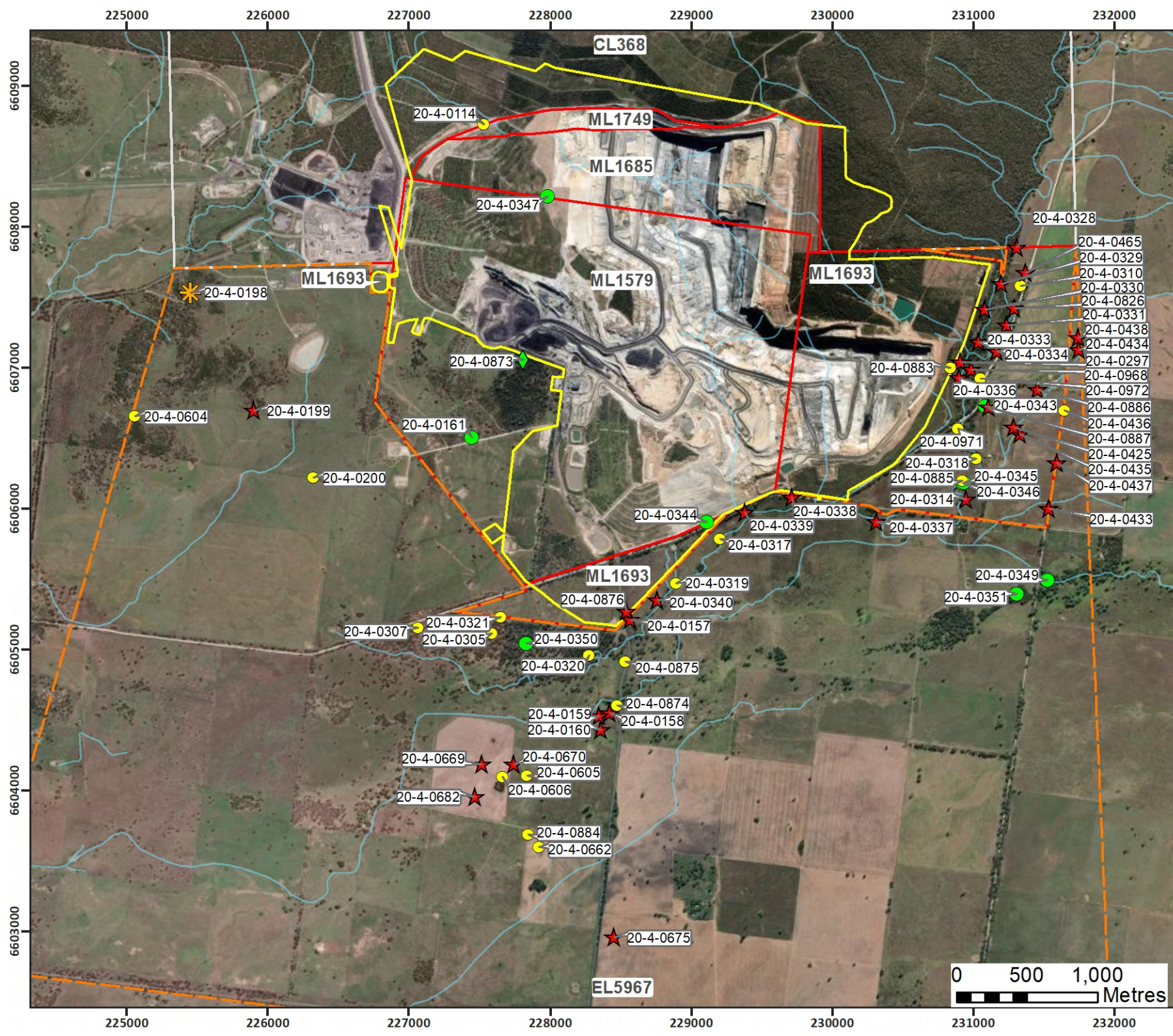
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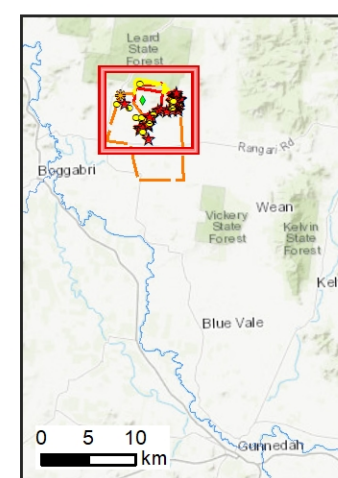
Version Control

Revision	Description	Author	Authorised by	Date
1	Initial document	R.W. Corkery & Co. Pty Ltd	Keith Ross	Dec 2005
2	2010 Modification review	Jill Scealy	Danny Young	March 2011
3	2011 PA 11 0047 review	Landskape	Danny Young	January 2014
4	PA 11 0047 review	L Johnson	Jill Johnson	June 2015
5	PA 11 0047 review MOD7	Whincop Archaeology	TCM	May 2021
6	Update into new template	Whincop Archaeology	Environment Superintendent	August 2024

Figure 1: Extant Aboriginal Heritage sites



- ★ Artefact Scatter
- Isolated Artefact
- ◆ Grinding Groove
- Scarred Tree, Being Reassessed
- ✱ Restriction
- Project Disturbance Boundary
- Mining Lease (ML)
- Exploration Lease (EL5967)
- Coal Lease (CL368)
- Major Hydroline
- Minor Hydroline



GDA 1994 MGA Zone 56
Whitehaven Coal Group,
Geoscience Aus.
Esri Basemap



Appendix 1: Project approval 11_0047 conditions

Schedule	Condition	Approval Condition	Relevant section of this plan
3	52	Heritage Management Plan <i>The Proponent shall prepare and implement a Heritage Management Plan for the project to the satisfaction of the Secretary. This plan must:</i>	
		(a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;	Section 3
		(b) be prepared in consultation with DPIE and local Aboriginal stakeholders (in relation to the management of Aboriginal heritage values);	Section 4 and 6 Appendix 2 and 3
		(c) be submitted to the Secretary for approval prior to undertaking any activities that may impact heritage items or sites, unless the Secretary agrees otherwise;	Section 3.10 and 10,
		(d) include the following for the management of Aboriginal cultural heritage: - a detailed archaeological salvage program for Aboriginal sites/objects within the project disturbance area, including methodology and procedures/protocols for: - sub-surface testing; - staged salvage, based on anticipated mine planning; - pre-disturbance monitoring; - site assessment and reporting; - research objectives to inform knowledge of Aboriginal occupation; - protection, storage and management of salvaged Aboriginal objects; - addressing relevant statutory requirements under the National Parks and Wildlife Act 1974; and, - long term protection of salvaged Aboriginal objects; - a description of the measures that would be implemented for: - protecting, monitoring and managing Aboriginal sites outside the project disturbance area; - maintaining and managing reasonable access for Aboriginal stakeholders to cultural heritage items on site and in the biodiversity offset area; - managing the discovery of any human remains or previously unidentified Aboriginal objects on site, including (in the case of human remains) stop work provisions and notification protocols; - ongoing consultation with the local Aboriginal stakeholders in the conservation and management of Aboriginal cultural heritage both on-site and in the biodiversity offset area; ensuring any workers on site receive suitable heritage inductions prior to carrying out any activities which may disturb Aboriginal sites, and that suitable records are kept of these inductions;	Section 6 Appendix 2, 4, 5, and 6
		(e) include the following for the management of historic heritage: - a description of the measures that would be implemented for: - managing the discovery of human remains or previously unidentified historic heritage items at the site, including (in the case of human remains) stop work provisions and notification protocols; and - ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site and ensure that suitable records of these inductions are kept.	Section 6 and 8.1 Appendix 2 and 6

Appendix 2: Registered Aboriginal Parties and Historic Stakeholders

All references in this HMP to Registered Aboriginal Parties (RAPs) refers to the parties listed alphabetically below.

- Aboriginal Native Title Consultants;
- Bigundi Biame Gunnedarr Traditional People;
- Bullen Bullen Consultants;
- Cacatua Culture Consultants;
- Giwir Heritage Consultants
- Gunida Gunyah Aboriginal Corporation;
- Min Min Aboriginal Corporation;
- Minnga Consultants; and
- Red Chief Local Aboriginal Land Council (LALC).

All references in this HMP to Historic Stakeholders refers to the parties listed below.

- Gunnedah and District Historical Society
- Gunnedah Rural Museum
- Narrabri Shire Council (NSC)
- Gunnedah Shire Council (GSC)

Appendix 3: Ongoing Consultation Commitments

A-3.1 Ongoing Consultation of Aboriginal Stakeholders (RAPs)

Up-to-dated contact details (full name, postal address, telephone number, and where possible, email address) from the RAPs to be provided to the Mine Environment Team throughout the life of the mine.

Ongoing consultation with RAPs will occur via meetings throughout the operational phases of the Mine.

Meetings and/or consultation with RAPs will be convened annually, with a minimum of 14 days' notice. Other Aboriginal Community members may attend meetings with prior agreement with TCM. All meetings to be minuted. Issues that may be discussed include:

- Issues raised by RAPs;
- mine progress and clearing campaigns;
- approval processes i.e. modifications and amendments;
- updates on Care Agreement and Keeping Place negotiations;
- fieldwork protocols, timing and arrangements;
- HMP review and revision;
- key results of any fieldwork (including the outcomes of salvage activities and post-salvage analysis and any additional training opportunities); and
- RAP input on, and facilitating access to, certain species of flora and fauna for cultural purposes.

A-3.2 Ongoing Consultation of Historic Heritage Stakeholders

Ongoing consultation will occur via meetings throughout the operational phases of the Mine. Meetings will be held on an as needed basis and will be open to individuals or groups with an interest in the historic heritage of the Mine. Minuted meetings where TCM will provide updates on:

- mine progress;
- HMP review; and
- key results of any fieldwork (including the outcomes of any salvage activities).

Appendix 4: Management of Aboriginal Cultural Heritage Sites

A-4.1 Protective Fencing and Signage

All identified Aboriginal cultural heritage sites within Table 1 (including any additional non-impacted sites identified in future) will be fenced and appropriately signed for the life of the Mine. Signs attached to fencing will include the following or similar:

ARCHAEOLOGICAL SITE

NO UNAUTHORISED ENTRY/DO NOT DISTURB

CONTACT TARRAWONGA ENVIRONMENT TEAM

High visibility fencing will be erected as soon as possible, unless alternative fencing arrangements are determined in consultation with RAPs. Fencing is only to be removed following closure of mine or following archaeological salvage of the site..

The fencing will enclose the site fully with the following buffer zones to protect potential sub-surface archaeological deposits from harm.

- Artefact Scatters and Isolated Artefacts – site extent plus 10 metre buffer.
- Scarred Trees – tree drip-line plus 5 metre buffer.
- Grinding Grooves – site extent plus 5 metre buffer.

Any existing tracks that traverse a fenced Aboriginal cultural heritage site should be inspected to see if the site or specific Aboriginal object can be salvaged. If not, it can continue to be used by 'soft' wheel vehicles (i.e. rubber tyres) and can be maintained accordingly. These portions of track, however, cannot be graded or be subject to ground disturbance activities without a due diligence assessment determining no Aboriginal objects will be harmed. Traffic and/or upgrading of roads will be managed or limited within these areas to reduce additional impacts. An alternative track location is the preferred option, but this will also need to be subject to a Due Diligence Assessment.

All heritage fencing will be inspected annually during the operational phase of the Mine to ensure integrity of the fencing and assess the condition of the fenced sites (Appendix A-4.1).

A-4.2 Cultural Heritage Fencing Audit

Inspection of cultural heritage fencing will be undertaken for the life of the Mine as part of a compliance auditing program. The fencing audit will be undertaken annually during the operational phase of the TCM. An archaeologist and RAP(s) are to be engaged by TCPL to conduct the cultural heritage fencing audit. Inspections of these sites will consider any potential impacts associated with drainage lines and erosive processes and any options to mitigate impacts. At a minimum, the inspection of each site will involve recording the following:

- condition assessment of site;
- condition assessment of fencing;
- photographic recording of each site from noted location; and
- evidence of any nearby disturbance.

A report will be prepared following completion of the cultural heritage fencing audit. The findings of the report will be presented in the Annual Review.

A-4.3 Potential Impacts from Weed and Feral Animal Management

Measures to control weeds and feral animals within the Project Boundary will avoid ground disturbance activities within all known Aboriginal cultural heritage sites, unless deemed necessary to the success of the weed and feral animal program.

A-4.4 Exemptions for Emergency Vegetation Management

Should an emergency situation arise that requires vegetation clearance (e.g. firefighting, hazardous materials spill) in the vicinity of protected Aboriginal cultural heritage sites, vegetation clearance will be undertaken with minimum possible disturbance to the topsoil.

Under Section 87A of the NP&W Act, the concept of 'Harming or desecrating' Aboriginal objects or places does not apply during:

- any emergency fire-fighting act or bush fire hazard reduction work within the meaning of the Rural Fires Act 1997 that is authorised or required to be carried out under that Act; and
- anything authorised by or under the State Emergency and Rescue Management Act 1989 in relation to an emergency (within the meaning of that Act) and that was reasonably necessary in order to avoid an actual or imminent threat to life or property.

Activities relating to maintenance, construction, or operational activities do not comprise emergency situations.

A-4.5 Aboriginal Community Access

Aboriginal community members may, throughout the life of the Mine, wish to access sites and/or areas within the Project Boundary and/or the Biodiversity Offset Areas for cultural purposes (e.g. education, ceremony). TCPL is committed to facilitating such access wherever possible. Aboriginal community members wishing to access sites should contact the Tarrawonga Environment Team in writing or register a verbal request at a RAP meeting. Requests for access will be assessed by Whitehaven, in consultation with RAPs and DPE, on the basis of merit. Where granted, access would be subject to relevant operational and safety considerations. Access to some areas may be restricted during periods of clearance or mining, and cannot be guaranteed. There will be no unauthorised access to the active mining area and any access will need a designated escort.

A-4.6 Potential Indirect Impacts - Blasting

To ensure it will not be indirectly impacted by blasting vibration, the Tarrawonga GG1 grinding grooves (AHIMS 20-4-0873) will be subject to vibration monitoring for all blasts scheduled within 500 metres of the site. The acceptable vibration limit will be determined by an appropriately qualified expert. Any future identified grinding groove sites within 500 metres of blasting activities will also need to be subject to vibration monitoring. In the event that potential blasting impacts are observed, or the acceptable vibration limit is exceeded the Procedure for Suspected Damage to Known Aboriginal Cultural Heritage Sites will be implemented (refer to Appendix A-6.4).

Appendix 5: Management of Salvaged Artefacts and Sites

A comprehensive archaeological salvage and monitoring program will be undertaken within the Project Boundary to mitigate scheduled impacts to known sites (Table 2), and to identify previously unrecorded sites within areas scheduled for impact. All archaeological salvage work will be undertaken by, or under the supervision of a qualified archaeologist and RAP(s). The below salvage program for impacted sites relates only to artefact sites. No other site types (e.g. scarred trees or grinding grooves) are scheduled to be impacted by the Project and therefore requiring salvage. If, however, additional site types are identified in proposed impact areas, this HMP will be revised to include site-specific salvage procedures.

Two (2) of the 58 existing Aboriginal cultural heritage sites covered by this HMP may require future impact subject to mine closure and final approved landform and closure requirements. The remaining 56 Aboriginal cultural heritage sites will be protected throughout the life of the Project (Appendix 4).

Table 4 Aboriginal Cultural Heritage Sites Scheduled to be Impacted

AHIMS	Site Name	Easting MGA 1994	Northing MGA 1994	Site Type	Scientific Significance
20-4-0876	Tarrawonga LOM AS1	228544	6605273	Artefact Scatter	Low
20-4-0883	Tarrawonga IA4	230838	6607002	Isolated artefact	Low

A-5.1 Impacts to Known Aboriginal Cultural Heritage Sites

Impacts to the ongoing expansion of the mining footprint will be mitigated through the implementation of an archaeological salvage program, including surface collection of artefact sites prior to disturbance.

A-5.2 Surface Collection Methodology

The objective of surface collection is to systematically record and recover a suitable sample of visible surface artefacts within open artefact sites. Should a previously recorded site not be able to be relocated after a reasonable search (to be determined by the qualified archaeologist in consultation with the attending RAP(s)) a Cultural Heritage Clearance Sign Off Form (WHC-PRO-Land Disturbance Protocols) can be completed. Surface collection will involve:

- the flagging of all visible artefacts within each site;
- the recording of individual artefact locations using a Differential GPS;
- compilation of a site photographic archive; and
- individual bagging of identified artefacts with a Unique Reference Number (URN).

All collected surface artefacts will be assigned a Unique Reference Number (URN) for accessioning and data analysis purposes. Analysis of surface artefacts will be conducted off site upon completion of each stage of the salvage program.

If a scar tree or other culturally significant tree is identified that has not been identified before, the tree is to be managed as per the scar tree removal protocol (refer to Appendix A-5.9).

A-5.3 Aboriginal and Cultural Heritage Signoff

An Aboriginal and Cultural Heritage Sign Off Form is included as part of the Land Disturbance Permit (LDP) protocol (WHC-PRO-TCM-Land Disturbance protocol). The LDP is required to be completed and issued to the contractor conducting land clearances. The attending archaeologist will complete the Aboriginal and Cultural Heritage Sign Off Form for sites where archaeological salvage has been completed and ground disturbing works can commence. Archaeological clearance will be provided to Whitehaven on a progressive and timely basis as sites are salvaged.

A-5.4 Post-Salvage Analyses

The primary objectives of the salvage program are to systematically record and recover archaeological data from impacted sites and, where artefact assemblages are of sufficient size, conduct artefact analysis that provides insight into pre- and post-contact Aboriginal life in the area. The salvage program and subsequent analyses will seek to provide insight into past Aboriginal life within the Project Boundary, including landscape use and methods of tool manufacture. Specifically, it will seek to answer questions such as:

- what spatial patterning is evident in the distribution of artefact class or raw material?
- does artefact distribution vary in relation to landscape features?
- how long have Aboriginal people utilised the sites within the Project Boundary?
- do the sites represent 'persistent places' (i.e. sustained, repeated occupation)?
- what activity or combination of activities occurred at these sites?
- What was the source of the lithic raw materials used on these sites?
- what knapping techniques or strategies were used?
- what types of tools were produced?
- what function(s) did these tools serve?

An appropriate sample of artefacts will be subject to detailed analysis undertaken by a suitably qualified archaeologist. Analysis will record and consider a variety of artefact attributes to address the above research questions, including: raw material; type of termination and/or platform, degree of reduction, presence of retouch, completeness, tool type, and dimensions.

Training in the undertaking of archaeological salvage may be provided to RAP participants, as desired. Opportunities for RAPs to analyse salvaged materials will be provided throughout the archaeological salvage program.

A-5.5 Salvage Reporting

TCPL will commission an archaeologist to produce reports detailing the results of the investigation programs. These reports will include:

- the aims and methodology of the investigation program;
- the location and characteristics of sites;
- the cultural values associated with the artefacts and the specific area from which the artefacts were salvaged;
- the number of Aboriginal objects collected from each site;
- the nature of the cataloguing system used;
- the lithic technology and reduction strategies adopted;
- an analysis of the regional and local contexts of the artefacts; and,
- a summary of consultation undertaken with the RAPs.

These reports will form part of the Annual Environmental Management Report/Annual Review (AEMR/Annual Review). They will be provided to the MEG and DPE within 12 months of the completion of each investigation program. The reports will also be provided to RAPs upon request at the conclusion of each salvage event.

Following completion of the salvage event, the archaeologist will provide relevant notification to the DPE to enable updating of the AHIMs records.

A-5.6 Pre-Disturbance Archaeological Clearance

Although the Project Boundary has been subject to archaeological survey during the EA process, there remains potential for previously unrecorded Aboriginal cultural heritage sites to exist within the Project Boundary. For this reason, areas scheduled to be impacted during mine development and expansion will be subject to archaeological clearance prior to ground disturbance. This process will involve the surface

inspection of expansion areas by a qualified archaeologist and RAP(s). Aboriginal cultural heritage objects identified during pre-disturbance archaeological clearance will be subject to the Procedure for the Discovery of Aboriginal Objects (Appendix 6).

A-5.7 Aboriginal Site Impact Record Forms

An Aboriginal Site Impact Recording Form (ASIRF) will be completed for all AHIMS sites salvaged as part of the Project, and forwarded to the AHIMS Registrar for update of the database. An ASIRF can now be completed directly through the AHIMS Quarantine portal.

A-5.8 Artefact Curation and Aboriginal Keeping Place

Ultimately, artefacts will be stored in an Aboriginal Keeping Place managed by the local Aboriginal community. RAPs will be consulted in order to identify a culturally appropriate Keeping Place for all salvaged material. Once the consultation process is complete, a Care Agreement, as required under the NP&W Act, is to be completed which sets out the obligations of the caretaker for the long-term safe keeping of transferred Aboriginal objects (<http://www.environment.nsw.gov.au/licences/CareAgreements.htm>).

Until the Keeping Place and Care Agreement are established, all Aboriginal cultural heritage objects recovered during the salvage program will be stored in an Interim Keeping Place in a suitable secure building and/or container, in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW2010b), located at the Tarrawonga Mine or other suitable Whitehaven site. A chain of custody will be prepared for any artefacts that leave site for specialist analysis.

Three cultural heritage sites within the Project Boundary were collected under Aboriginal Heritage Impact Permits 2312 [NAS01 and NIS01] and 1123843 [NAS02]. These are currently stored at the Cumbo Gunerah Keeping Place at the Red Chief LALC office in Gunnedah.

Following the completion of rehabilitation activities or during the rehabilitation program at a time when works within the specific area do not pose a threat, the salvaged Aboriginal objects will be replaced in a location as close as possible to their original location in consultation with DPE and the RAPs. Aboriginal object replacement will be conducted by a suitably qualified archaeologist, with the RAPs invited to observe and participate in repatriation works.

A-5.9 Scarred tree removal

The removal of a scarred tree, if required in the future, will follow the below four step procedure:

1. pre-removal preparation;
2. removal/relocation;
3. storage; and
4. management/preservation.

Pre-removal Preparation

A qualified arborist will be engaged to plan, conduct and direct the tree removal works. The arborist is responsible for assessing the most appropriate method of removing each tree based on specific factors such as species, condition and location.

A qualified archaeologist will be engaged to attend the removal in order to address potential archaeological issues such as exposure of artefacts during topsoil disturbances.

A pre-removal planning meeting will be held onsite that includes TCPL representatives, the arborist, two RAPs and the qualified archaeologist. This allows all parties to discuss the works program and any logistical issues. The pre-removal planning meeting may be held on the day of the tree removal or before.

The following equipment may be required:

- backhoe;
- large front-end loader;
- excavator;
- 25 tonne all-terrain crane;

- 50 tonne crane;
- tipper (for hay bales for bedding);
- elevated work platform;
- 20 tonne soft slings;
- water truck;
- wool bags or similar for bedding;
- concrete blocks for plinths;
- chain saws;
- carpet or similar for wrapping scar and bole of tree; and/or
- hazard cones, bunting signage, or similar.

Removal/Relocation

The following steps provide a guide for the tree removal. This process will be subject to modification based on the arborist's recommendations.

- prepare access and safe work area, including a barricaded exclusion zone.
- wrap carpet or similar around scar for protection.
- erect an elevated platform to remove overhanging branches and limbs (if required).
- attach lift swing.
- use backhoe to trench around the tree to expose the base of the bole (trunk) above the roots.
- once the trench has been excavated and the base of the bole cut, the crane can begin removing the tree from the trench.
- load the tree on the truck for transportation and relocate the tree to a keeping place or storage area.
- tree can then be cleaned and cared for including application of pest control.

Storage

This section describes the process for storage of the trees. This process will be subject to modification based on the arborist's recommendations.

Trees will be placed on non-timber-based sleepers such as high strength concrete block or plinths. The storage facility must be of sufficient size to adequately store and maintain the number and sizes of all removed trees. The facility must be suitable for enabling cleaning and maintenance of the trees. A tag, identifying the tree, including AHIMS ID will be placed on the tree.

In addition, a barrier layer of acrylic resin at the base or other suitable area of the tree and an indelible pigment-based pen will be used to apply the registration number of the scarred tree. All marking of the tree will avoid the cultural scar(s).

Preservation - Cleaning

This section describes the process for preservation (including cleaning) of the trees. This process will be subject to modification based on the arborist's recommendations.

Many trees suffer from termite activity and rotting, which subsequently hollows the tree's trunk. An attempt will be made to clear all termite detritus from the inside of the trunk and the outer surface, as far as practical without damaging the scar for which the tree has been salvaged. Termite detritus will be removed using brushes, probes, and a vacuum cleaner. Insects recovered during this process will be identified to determine an appropriate eradication procedure. Insect traps, such as glue pads, will be placed throughout the storage container or shed as required.

Preservation – Seasoning

The process for preservation (including seasoning) of the trees will be subject to modification based on the arborist's recommendations.

Should the scarred tree that is to be removed be a living or 'green' tree it must be stored indoors until the moisture content is below 20%. Trees with moisture content less than 20% are unlikely to support decay

fungi degradation and will also be relatively physically stable. In dry conditions, the trees will age and season readily.

Once seasoned, high temperatures are less likely to affect the trees, however 'green' humidity may obstruct the drying process. Humidity indicators and moisture detection strips may be used as a guide to ventilation requirements. Such requirement may be as simple as opening the container or shed doors on a dry day. The scarred trees will be monitored regularly (monthly) during the initial stages of their storage.

Appendix 6: Contingencies and Protocols

A-6.1 Land Disturbance Permits

The LDP (WHC-PRO-Land Disturbance Protocols) will apply to all land disturbance activities within the Project Boundary, including tree clearing. The objective of the LDP is to assess whether there is potential for proposed works to impact known, or previously unidentified Aboriginal or historic heritage sites as well as to manage other environmental impacts. Staff (including contractors) will be made aware of their responsibilities concerning heritage.

Before commencement of any ground disturbance works, Project staff and contractors must complete the LDP form and undertake necessary measures to manage identified risks to known and potential heritage sites. Works will not commence until all management measures have been completed, and the LDP is approved by the Tarrawonga Environmental Superintendent or representative.

The LDP will include provision for ecologists and/or archaeologists to check trees for scars of potential Aboriginal origin during vegetation clearance surveys. Should a tree with a potential scar be identified the Procedure for the Discovery of Aboriginal Objects will apply (A-6.3).

A-6.2 Procedure for the Discovery of Human Remains

In the event that suspected human remains (skeletal material) are discovered, the following procedure is to be followed:

- All work must cease immediately in the near vicinity of the find location.
- Notification of the potential human remains must be made immediately to the Tarrawonga Environmental Superintendent.
- The Tarrawonga Environmental Team is to notify the police immediately.
- The Tarrawonga Environmental Team is to contact the DPE environment line on 131 555 to report the find and advise that police have been notified. DPE will provide details on the current processes for dealing with archaeological skeletal remains (whether Aboriginal or historic).
- Under instruction of the Police, a suitable area is to be cordoned off by temporary fencing around the suspected human remains site - work can continue outside this area as long as there is no risk of interference to the human remains or the assessment of human remains.
- If the remains are determined to be of Aboriginal origin, then under the advice of DPE, RAPs will be consulted regarding appropriate treatment and/or repatriation of the individual(s).
- Do not recommence work at the location until all legal requirements and the reasonable requirements of DPE and the RAPs have been adequately addressed.

A-6.3 Procedure for the Discovery of Aboriginal Objects

It is possible that further Aboriginal sites or artefacts will be uncovered during the development and or expansion of the Mine. Likely site types include artefact scatters, grinding grooves and isolated stone artefacts. In the event that previously unidentified Aboriginal objects are discovered throughout the life of the Project, the following procedure (in consideration of the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW [OEH, 2011]) is to be adopted:

- All works must cease immediately in the vicinity of the find location to prevent any further impacts to the object(s).
- Notification of the potential Aboriginal object must be made immediately to the Tarrawonga Environmental Team.
- A qualified archaeologist will be engaged to determine the nature, extent and scientific significance of the object(s).
- If the object is determined to be an Aboriginal cultural heritage object:

- an AHIMS site card will be completed and submitted to DPE in compliance with s.89A of the *NPW Act 1974* - site cards will be lodged within 21 days and a copy provided to RAPs upon request;
 - the Tarrawonga *Aboriginal Cultural Heritage Sites Database* will be updated with the relevant information (section 1.2); and
 - the *HMP* is to be reviewed, and if a revision is necessary, the updated *HMP* will be provided to DPE and DPE for approval.
- If the Aboriginal object is located within an area schedule for impact, then the object will be salvaged in accordance with the surface Collection Methodology (Appendix 5)

Failure to report a discovery and those responsible for the damage or destruction occasioned by unauthorised removal or alteration to a site or to archaeological material may be prosecuted under the relevant Acts.

A-6.4 Procedure for Suspected Damage to Known Aboriginal Cultural Heritage Sites

Where suspected damage to a known Aboriginal cultural heritage site is identified, the following procedure applies:

- All works will cease immediately in the area to prevent any further impacts to the site/objects;
- The Tarrawonga Environmental Team is to be notified immediately;
- The Tarrawonga Environmental Team will prepare an incident report that will outline the nature of the event, and the controls to be implemented to ensure the event is not repeated. The incident will then be reported to DPE as a compliance issue;
- In consultation with RAPs, a management strategy will be developed to ensure the site and/or objects are secured and any potential for further impact eliminated. Where a management strategy cannot be agreed by TCPL and RAPs, a qualified archaeologist will be consulted to advise archaeological best practice. Should agreement still not be determined, DPE will be consulted;
- Once DPE feedback is addressed and agreement by all parties to the management strategy is reached, work can proceed; and
- The procedure undertaken will be documented in an incident report.

Failure to report a discovery and those responsible for the damage or destruction occasioned by unauthorised removal or alteration to a site or to archaeological material may be prosecuted under the relevant Acts.

A-6.5 Procedure for Previously Unidentified Historic Heritage Sites

In the event that a previously unidentified historic site and/or relic is discovered throughout the different phases of the Mine, the following procedure is to be adopted:

- all works will cease immediately in the area to prevent any further impacts to the site/relics;
- the Tarrawonga Environmental Team is to be notified immediately;
- a qualified archaeologist will be engaged to determine the nature, extent, and significance of the site/relics; and
- the *HMP* is to be reviewed, and if a revision is necessary, the updated *HMP* will be provided to DPE and DPE, as soon as practicable.

Failure to report a discovery and those responsible for the damage or destruction occasioned by unauthorised removal or alteration to a site or to archaeological material may be prosecuted under the relevant Acts.