



Our ref: DOC21/110300
Your ref: SSI-9717

Anthony Ko
Team Leader
Energy Resource Assessments
Department of Planning, Industry and Environment
Email: anthony.ko@planning.nsw.gov.au

Advice provided via the Major Projects Portal

Dear Mr Ko

Notice of Exhibition - Snowy 2.0 Transmission Connection Project EIS, Snowy Monaro and Snowy Valley's LGA (SSI 9717)

I refer to your email dated 17 February 2021 seeking comments on the state significant infrastructure (SSI) project for the Snowy 2.0 Transmission Connection Project Environmental Impact Statement (EIS), within the Snowy Monaro and Snowy Valley's Local Government Areas (LGAs). Heritage NSW understands that the proposed development involves the construction and operation of an overhead transmission line connection and substation to connect Snowy 2.0 to the National Electricity Market.

Heritage NSW has reviewed the EIS and documents provided in relation to Aboriginal cultural heritage matters and provides comments below. The following reports were considered in our assessment:

- *Environmental Impact Statement: Snowy 2.0 Transmission Connection Project*. Report produced by Jacobs for TransGrid, dated February 2021.
- *Appendix C - Snowy Hydro 2.0 Transmission Connection Project: Aboriginal Cultural Heritage Assessment*. Report produced by Jacobs for TransGrid, dated February 2021.

Heritage NSW comments

The Aboriginal Cultural Heritage Assessment Report (ACHAR) identifies a number of Aboriginal sites (56-6-0009, 56-6-0477, 56-6-0495, 56-6-0496 and 56-6-0497) and four potential archaeological deposits (PAD) within the project area. We note however, that some areas of the project remain unsurveyed and untested.

- A program of test excavation has been undertaken for two of the four PADs (ST PAD 03 and Substation PAD), providing knowledge of the nature and significance of these PADs. Two remaining PADs (ST PAD 01 and ST PAD 02) have not been excavated but have been assessed based on assumptions and results from the nearby Snowy 2.0 project. Heritage NSW is concerned that these two PADs, ST PAD 01 and ST PAD 02, have not been test excavated during the EIS process although there has been adequate opportunity for this to occur. The ACHAR itself states the significance of the PADs cannot be comprehensively assessed prior to archaeological test excavation. As such, Heritage NSW cannot make any comment or provide informed recommendations to DPIE regarding the sites ST PAD 01 and ST PAD 02.
- Similarly, Heritage NSW notes the ACHAR (Jacobs 2020) and EIS (Jacobs 2021) identify that some of the impact area, specifically the track atop Sheep Station Ridge, was not

assessed as it could not be accessed and that once access is established it will be surveyed. Heritage NSW cannot make any comment or provide informed recommendations to DPIE regarding this section until it has been assessed.

The management measures provided by Jacobs recommend that both surface collection and salvage excavations be undertaken at selected sites and that a Cultural Heritage Management Plan (CHMP) be prepared. Heritage NSW advises that the preparation of a CHMP, post approval, should not take the role of adequate assessment during the EIS process.

Aboriginal cultural heritage advice

As test excavations have not been completed for all PADs within the project area, the full impacts to Aboriginal cultural heritage values remain unknown. As the ACHAR outlines the significance of the untested PADs cannot be comprehensively assessed prior to archaeological test excavation, Heritage NSW recommend DPIE consider whether enough information is available to inform impacts to Aboriginal cultural heritage values. Alternatively, upfront test excavations would inform the significance of the PADs, whether future salvage excavation is required and would allow the proponent to redesign the project to avoid any significant objects or sites if necessary.

As the ACHAR records that no comments have been received from the Registered Aboriginal Parties (RAPs) during the comment period for the draft ACHAR, we recommend additional efforts are made to seek input from the RAPs to ensure the proposed management recommendations are understood. We also note that the consultation log (ACHAR - Appendix A) has not been updated since July 2020 and recommend this be amended to include the attempts and outcomes of consultation that has occurred since that date.

Both the ACHAR and EIS make recommendations for salvage of Aboriginal objects prior to construction. There is however, no indication of how these objects will be managed once collected. Heritage NSW recommends this be clarified and resolved prior to consent approval to avoid any potential conflict between stakeholders. In line with this, we remind the proponent that obligations to obtain other legal instruments, i.e. Care Agreements under section 85 of the *National Parks and Wildlife Act 1974* and the submission of Aboriginal Site Impact Recording Forms remain in force.

If you have any further questions in relation to this advice, please contact myself or John Gilding, Archaeologist, Aboriginal Cultural Heritage Regulation - South, Heritage NSW on 0428 897 811 or email at john.gilding@environment.nsw.gov.au.

Yours sincerely



Jackie Taylor
Senior Team Leader, Aboriginal Cultural Heritage Regulation - South
Heritage NSW
29 March 2021