

Our ref: DOC22/135036-2

Ms. Emma Barnet Senior Environmental Assessment Officer Energy Resource Industry Assessments Department of Planning and Environment

Advice provided via the Major Projects Portal

Dear Ms Barnet

Advice regarding Environmental Impact Statement – State Significant Development – Moss Vale Plastics Recycling Facility – Wingecarribee LGA (SSD-9409987)

I refer to your email dated 22 February 2022, seeking advice from Heritage NSW (HNSW) for the proposed Moss Vale Plastics Recycling Facility, 74-76 Beaconsfield Road, Moss Vale (SSD-9409987) of Part Lot 11, DP 1084421, located within the Wingecarribee Local Government Area.

HNSW have reviewed the following documentation prepared to support the project, including the *Environmental Impact Statement* (EIS), dated January 2022 and prepared by GHD; and the *Aboriginal Cultural Heritage Assessment Report* (ACHAR), dated October 2021 and prepared by OzArk Environment & Heritage.

HNSW is satisfied that the supplied documentation has adequately identified and assessed the impact of the proposal on any Aboriginal cultural heritage (ACH) values within the development area, in accordance with the SEARs for the project. HNSW also acknowledges the fulfilment of project specific requirements as per previous advice issued on 6 October 2020 by HNSW in relation to archaeological investigation and community consultation for the project.

Comments and recommendations are provided at Attachment A.

If you have any questions regarding the above advice, please contact Rebecca Yit, Archaeologist at Heritage NSW, on 4927 3244 or rebecca.yit@environment.nsw.gov.au

Yours sincerely

Kym McNamara

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Senior Assessments Officer

Heritage NSW

Department of Premier and Cabinet

Date: 22 March 2022



1. An Aboriginal cultural heritage management plan (ACHMP) must be prepared and implemented for the project

In accordance with the recommended management measures outlined in the EIS, an ACHMP must be developed for the project in consultation with the RAPs and to the satisfaction of HNSW, to manage and mitigate extant Aboriginal sites and objects located with the project area. HNSW recommends that an ACHMP be developed in consultation with the RAPs and to the satisfaction of HNSW, prior to any ground disturbance works being undertaken.

HNSW recommends that a consent condition is created that requires an ACHMP be prepared in consultation with the RAPs prior to ground disturbing works being undertaken for the project.

2. Aboriginal sites to be impacted by the proposed development must be mitigated

Based on the information supplied in the ACHAR, registered Aboriginal Heritage Impact Management System (AHIMS) sites #52-4-0712 (MVREC IF1), #52-4-0386 (BR-IF1) and #52-4-0387 (BR-IF2), located within the proposed project area will be subject to full impact by project construction works.

The EIS and ACHAR recommend the isolated finds associated with the above sites be salvaged by community collection, under a mitigation procedure integrated into the ACHMP, to be developed for the project. HNSW concurs with the recommendation of impact mitigation for the above AHIMS sites as outlined in the ACHAR.

Should the Aboriginal object be salvaged, then an Aboriginal Site Impact Recording (ASIR) form must be completed and submitted, for inclusion on the AHIMS database.

HNSW recommends a mitigation strategy for AHIMS sites #52-4-0712 (MVREC IF1), #52-4-0386 (BR-IF1) and #52-4-0387 (BR-IF2) be integrated into the ACHMP, to be prepared for the project.

3. Aboriginal sites subject to test excavation must be appropriately managed

HNSW understands newly recorded AHIMS sites #52-4-0713 (Beaconsfield Rd OS-1), #52-4-0714 (Beaconsfield Rd OS-2), #52-4-0716 (Beaconsfield Rd IF-2), and #52-4-0717 (Beaconsfield Rd IF-3) have been subject to a test excavation program under the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010). The AHIMS database must be updated to reflect the current status of



Aboriginal sites located within the project area, to show which sites have been subject to impacts from test excavation.

For any impacted site, an ASIR form must be submitted for inclusion on the AHIMS database. The ASIRs must show the total count of the artefacts identified at each site.

HNSW recommends the status of Aboriginal sites located within the project area is updated on AHIMS to reflect the current status of the site. It is expected that the ACHMP, to be prepared for the project, will include measures for the appropriate management of salvaged Aboriginal objects and sites impacted as a result of the 2021 test excavation.

4. Long term management of Aboriginal objects in the project area

It is understood that the long-term care and curation of Aboriginal objects recovered from the project area is yet to be finalised with the Registered Aboriginal Parties (RAPs).

HNSW recommends that the finalised long term care and control procedure for the management of any Aboriginal objects from the project area including any extant sites, must be integrated into an ACHMP, to be prepared for the project.

5. Northern boundary of the project area is to be fenced

The ACHAR recommends the northern boundary of the development area adjacent to AHIMS site #52-4-0715 Beaconsfield Rd IF-1 be fenced prior to and for the duration of ground disturbing activities to ensure no inadvertent impacts occur to this site.

HNSW supports this proposal to protect known Aboriginal cultural heritage values from potential impacts associated with the proposed development.