

6 March 2026



Department of Planning Housing and Infrastructure

To Whom It May Concern,

Re: Endorsement of Unexpected Heritage Finds procedure for Billabong Creek Environmental Regulators (2024 09 EMF-PCD)

Fyfe Pty Ltd trading as NGH Consulting (NGH) have reviewed the unexpected finds procedure (2024 09 EMF-PCD - Unexpected heritage find procedure) provided for the Billabong Creek Environmental Water Regulators (SSI-50831979 – the Project) written by NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW), dated February 2026. This *unexpected heritage find procedure* is not specific to the Project but is a procedure to provide a consistent method for managing unexpected heritage items of both Aboriginal and non-Aboriginal heritage that may be discovered during activities undertaken by or on behalf of DCCEEW - Water Group. This *unexpected heritage finds procedure* will be included in the Aboriginal Cultural Heritage Management Sub-plan of the Construction Environment Management Plan for the Project once these are approved.

The *unexpected heritage find procedure*, which includes an unexpected heritage find flowchart and suspected human remains flowchart, detail is consistent with current archaeological best practice and is compliant with the relevant legislative and regulatory requirements for managing heritage in NSW. In our experience, the *unexpected heritage find procedure* is consistent with unexpected finds procedures that have been approved for other State Significant Development and State Significant Infrastructure Developments in NSW as part of approved heritage management plans such as Blind Creek Solar Farm, Culcairn Solar Farm, Walla Walla Solar Farm, for example, that were prepared by NGH heritage consultants.

The *unexpected heritage finds procedure* was reviewed by qualified archaeologist Dr Tessa Bryant (BA/BSc, BA (Hons), MA (Hons), PhD – NGH Senior Heritage Consultant) with over 10 years experience in NSW heritage management and is endorsed by NGH as a suitable unexpected finds procedure for the Billabong Creek Environmental Water Regulators Project. The unexpected heritage finds procedure is broadly in accordance with requirement of E21 of the Conditions of Approval for the Project for an Unexpected Heritage Finds and Human Remains Procedure, although the procedure does not specify the author or if it was developed in consultation with Heritage NSW and the Heritage Council of NSW. It is noted that the *unexpected heritage find procedure* specifies that the newly recorded Aboriginal objects or sites recorded following the procedure must be registered on the Aboriginal Heritage Information Management System (AHIMS) as is required by condition E21(c). It also correctly notes that any for any finds of potential human remains, work must cease and the police or the coroner notified.

If you have any questions, please contact me on (02) 9800 4038. I would be pleased to discuss any aspect of this endorsement further.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tessa Bryant', written in a cursive style.

Dr Tessa Bryant

Senior Heritage Consultant

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Canberra

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