

Appendix C: Addendum Aboriginal Cultural Heritage Assessment Report



BULLAWAH WIND FARM PROJECT OFFSITE ROAD WORKS

Addendum Aboriginal Cultural Heritage Assessment
Report

FINAL

Prepared by
Umwelt (Australia) Pty Limited
on behalf of
Bullawah Wind Farm Pty Ltd

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Report No.	22110/R35_Appendix 4
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This report was prepared using
Umwelt's ISO 9001 certified
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Acknowledgement of Country

Umwelt would like to acknowledge that the Project documented herein was undertaken on Wiradjuri, Baraparapa and Nari Nari Country. We pay respect to their respective cultural heritage, beliefs, and continuing relationship with their sky, lands and waters. We pay our respect to their Elders – past, present, and future.

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Abbreviations

Abbreviation	Description
ACHA	Aboriginal Cultural Heritage Assessment
ACHA	Aboriginal Cultural Heritage Assessment report
ACHMP	Aboriginal Cultural Heritage Management Plan
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
ASIR	Aboriginal Site Impact Recording
BWF	Bullawah Wind Farm Pty Ltd
DCCEEW	NSW Department of Climate Change, Energy, the Environment and Water
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979 (NSW)</i>
ILUA	Indigenous Land Use Agreement
GHG	Greenhouse gas (emissions)
GW	Gigawatt
km	Kilometres
LALC	Local Aboriginal Land Council
LEP	Local Environmental Plan
LGA	Local Government Area
LLS	Local Land Services
m	Metres
mm	Millimetres
NNTT	National Native Title Tribunal
NPW Act	<i>National Parks and Wildlife Act 1974 (NSW)</i>
NPW Regulation	National Parks and Wildlife Regulation 2019 (NSW)
NSW	New South Wales
NTSCORP	Native Title Services Corporation Limited
PAD	Potential Archaeological Deposit
RAP	Registered Aboriginal Party
SEARs	Secretary's environmental assessment requirements
SSD	State Significant Development
WTGs	Wind turbine generators

Executive Summary

Introduction

Bullawah Wind Farm Pty Ltd (BWF) proposes to develop the Bullawah Wind Farm (the Project), located approximately 36 km south east of Hay, within the South West Renewable Energy Zone (South West REZ). The Project Area is located within the Hay Shire, Murrumbidgee and Edward River Local Government Areas (LGAs). The Project will include the installation, operation, maintenance and decommissioning of up to 141 wind turbine generators (WTGs), battery storage, ancillary infrastructure and temporary facilities associated with construction of the Project. The Project design incorporates up to 141 wind turbines, with a maximum blade-tip height of 300 m above ground level.

In responding to agency advice from Transport for NSW (TfNSW) and with regard to other design and logistics considerations identified by BWF, a decision to extend the Port to Hay transport route considered in the State Significant Development Application (SSDA) has occurred. This extension now encompasses two (2) port options, being Port of Newcastle (identified in the EIS) and Port Adelaide (a new port option considered in the Amendment Report). It is noted that the Port of Newcastle option was considered in the EIS, however impacts were only assessed for the “Local Transport Route” component (i.e. the intersection of the Cobb Highway and Jerilderie Road to the Project Area). The Amended Project now includes consideration of non-local aspects of this transport route.

Accordingly, BWF is now seeking consent for any and all impacts associated with off-site road works and alterations along the proposed routes between the nominated Ports and the Project Area, noting that consent associated with the SSDA is wholly limited to works within NSW.

The Amended Project (refer to **Section 1.3**) proposes five (5) Port to Hay Transport Route options for Over-size Over-mass (OSOM) vehicles. This includes three (3) route options from the Port of Newcastle, and two (2) route options from the Port Adelaide. Areas have been identified along the Port to Hay Transport Routes where road modifications would be required to enable the safe transport of Project components using OSOM vehicles. In some instances, these road modifications result in disturbance outside of the existing road pavement, which has warranted further assessment of relevant environmental constraints within the Amendment Report, including potential impacts to Aboriginal cultural heritage values.

All other aspects of the Port to Hay Transport Routes encompass works that are either occurring within highly disturbed existing road reserves (e.g. existing road pavement), and/or are very minor and do not include any disturbance works (e.g. tree trimming). As such, further assessment of these areas was not warranted within the original Addendum ACHA (or this revised version) and broader Amendment Report.

The additional areas of disturbance, where further consideration of potential impacts to Aboriginal cultural heritage values is warranted, comprise the following three (3) ‘off-site road works areas’:

- **Euston:** Murray Valley Highway onto Sturt Highway at Euston, NSW. Additional hardstand and associated fill required to bring new hardstand area level with the highway. Sign to be relocated.
- **Balranald:** Right hand bend on Sturt Highway at Balranald, NSW. Hardstand will be required on the outside of corner along with the removal of vegetation, light poles and numerous signs. Median strips to be made trafficable/replaced with painted lines.

- **Hay:** Roundabout on Sturt Highway at Hay, NSW onto Cobb Highway. Several light poles and signs to be removed or relocated. Hardstand to be installed on exit of corner.

Other aspects of the Amended Project do not relate to disturbance and are not considered further in this report. Further information regarding the EIS Project, the Amended Project (incl. the off-site road works areas) and the objectives of this assessment are provided in **Section 1.0**.

This updated version of the Addendum Aboriginal Cultural Heritage Assessment (ACHA) report is prepared in response to Heritage NSW (H-NSW) feedback following its review of documentation supplied in support of the broader Amendment Report. The H-NSW advice received and the responses provided are documented in **Section 1.11**, and **Table 1.5** of this report. This includes references to specific sections of the report that have been updated accordingly and how each matter has been addressed within this updated Addendum ACHA.

Fieldwork Program

Targeted visual inspection of the off-site road works areas and their surrounds did not identify any new Aboriginal sites. In general, survey of the three (3) off-site road works areas by a suitably qualified and experienced Principal Archaeologist, indicated extensive ground disturbance associated with road prior construction activities, with negligible archaeological potential (surface or subsurface).

This updated Addendum ACHA was undertaken with due regard to the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH [former], 2011). However, as preliminary assessment of the off-site road works areas has indicated significant ground disturbance and negligible archaeological potential (surface or subsurface) systematic archaeological survey is not required with reference to Requirement 5 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW [former] 2010).

Further information regarding the fieldwork program is provided in **Section 4.0** of this report.

Impact Assessment

A comprehensive assessment of significance and impact is provided in **Section 5.0** and **Section 6.0** of this report respectively. This assessment has determined that it is unlikely that surface and/or subsurface Aboriginal objects will be directly impacted by the construction of the off-site road work areas.

Management Recommendations

This original Addendum ACHA forms part of the Amendment Report prepared by Umwelt to accompany BWF's application for SSD Consent under Division 4.1 of Part 4 of the EP&A Act. The Code of Practice (DECCW, 2010b) also provides best practice documents for Aboriginal Cultural Heritage Impact Assessments in NSW.

Accordingly, and despite impacts being unlikely, both documents have been considered in the formulation of the management strategy provided in **Section 7.0** and reproduced below. It is also recommended that this strategy be detailed in the Aboriginal Cultural Heritage Management Plan (ACHMP) that was recommended for the Project (Umwelt, 2025). There are no changes to these management recommendations as a result of the H-NSW advice and updates made to this Addendum ACHA.

Previously Unrecorded Aboriginal sites and/or Objects

Provisions regarding the appropriate management action(s) for any previously unrecorded Aboriginal sites and/or objects identified within the off-site road works areas throughout the life of the Project must be incorporated into the ACHMP (i.e. an Unexpected Finds Protocol). Management action(s) will vary according to the type of evidence identified, its significance (both scientific and cultural) and the nature of potential impacts.

Previously Unrecorded Aboriginal Objects

Provisions regarding the appropriate management action(s) for any previously unrecorded Aboriginal archaeological sites/materials identified within the off-site road works areas throughout the life of the Project (including construction, operations and decommissioning phases) must be incorporated into the ACHMP (i.e. an Unexpected Finds Protocol). Management action(s) will vary according to the type of evidence identified, its significance and the nature of potential impacts but in general will comprise the following procedure:

- All works would cease immediately in the area to prevent any further impacts to the object(s).
- Notify the BWF Environmental Manager and/or Project Manager immediately.
- A qualified heritage consultant would be engaged to determine the nature, extent and scientific significance of the object(s). RAPs are to be notified in writing regarding the nature of the find and if required, proposed management actions. RAPs will be requested to provide comments within seven (7) days.
- An AHIMS site card would be completed and submitted to Heritage NSW in compliance with Section 89A of the NPW Act. The site cards will be lodged within 21 days and a copy provided to those RAPs who wish to have a copy.
- The ACHMP and any other Project environmental management systems or databases would be updated (as relevant) to address the new Aboriginal site.

Human Skeletal Remains

In the event that potential human skeletal remains are identified throughout the life of the Project (including construction, operations and decommissioning phases), the following standard procedure outlined below will be followed (this procedure will also be included in the ACHMP for the Project):

- All work in the vicinity of the remains must cease immediately.
- The location must be cordoned off and the appropriate authorities notified (including NSW Police and if considered of possible Aboriginal descent, NSW Heritage).
- Subject to any alternative instruction from the NSW Policy or Heritage NSW, a physical or forensic anthropologist would be commissioned to inspect the remains *in situ* and make a determination of ancestry (Aboriginal or non-Aboriginal) and antiquity (pre-contact, historic or modern).
- Subsequent management actions will be dependent on the findings of the inspection undertaken under Point 3.

- If the remains are identified as modern and human, the area will become a crime scene under the jurisdiction of the NSW Police.
- If the remains are identified as pre-contact or historic Aboriginal, the site will be secured, and Heritage NSW and all RAPs notified in writing.
- If the remains are identified as historic (non-Aboriginal), the site is to be secured and the Heritage NSW contacted.
- If the remains are identified as non-human, work can recommence immediately.

Aboriginal Cultural Heritage Awareness Training

An Aboriginal cultural heritage awareness training package will be developed for use throughout the life of the Project. This package will be developed and completed prior to the commencement of any ground disturbance works, and will apply to these off-site road works areas. Aboriginal cultural awareness training will be mandatory for all staff and contractors whose roles may require interaction with Aboriginal sites and/or involve consultation with Aboriginal stakeholders.

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1.0 Introduction

1.1 Introduction

Bullawah Wind Farm Pty Ltd (BWF) proposes to develop the Bullawah Wind Farm (the Project) to provide a reliable and affordable source of energy for the people of New South Wales (NSW). The Project is located approximately 36 km south east of the township of Hay, in the Riverina region of south western NSW. The Project is located within the Hay Shire, Murrumbidgee and Edward River Local Government Areas (LGAs) and is within the South West Renewable Energy Zone (REZ).

The Project is State Significant Development (SSD) as defined under the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP) and requires development consent under Part 4 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act). The Project has also been declared a controlled action (EPBC 2022/09423) under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) based on potential impacts to EPBC Act listed threatened species and communities. The Project will be assessed by the NSW Government under the Bilateral Agreement between NSW and the Commonwealth (Amending Agreement No. 1). Accordingly, an Environmental Impact Statement (EIS) was prepared to address the NSW Department of Planning, Housing and Infrastructure (DPHI) Secretary's Environmental Assessment Requirements (SEARs) provided for the Project (i.e. the EIS Project).

Public exhibition of the EIS took place between 27 August 2024 and 23 September 2024 with 87 unique submissions made by the public as well as submissions from three (3) local councils and 19 government agencies. A formal response to these submissions and government agency advice received on the Project EIS was provided in the form of a Submissions Report (Umwelt, 2025). The Submissions Report included the preparation of a Revised Aboriginal Cultural Heritage Assessment (ACHA) report (also referred to as the Project ACHA or Revised ACHA) (Umwelt, 2025) to address advice received from Heritage NSW (H-NSW), and to respond to submissions raised by the community (where applicable).

Since submission of the EIS, and in response to select community submissions and government agency advice, BWF has conducted a thorough review of the layout and optimised the Project design to enhance its efficiency while minimising associated environmental and social impacts. This amended Project design is hereafter referred to as the Amended Project.

This report has been prepared as an Addendum to the Project ACHA to document the assessment of relevant changes proposed under the Amended Project. These changes are discussed in **Section 1.3** below.

1.2 The EIS Project

The key components of the EIS Project are summarised below:

- Up to 141 (three (3) blade) wind turbine generators (WTGs), with a maximum blade-tip height of 300 metres (m) above ground level.
- A 359 MW / 718 megawatt hour (MWh) battery energy storage facility.

- Permanent ancillary infrastructure including internal roads, hardstands, main and collector substations, switchyards, operations and maintenance facilities, underground and overhead electricity transmission lines and poles, telecommunications facilities and utility services, permanent meteorological masts and water storage tanks.
- Temporary facilities including a temporary workforce accommodation (TWA) camp, site offices, amenities, construction compounds and laydown areas, on-site borrow pits, rock crushing facilities, concrete or asphalt batching plants, minor 'work front' construction access roads, environmental management and monitoring and signage.
- Off-site road works, involving upgrades to the proposed local transport route and establishment of site access points to facilitate delivery of wind turbine components to the Project Area as required.

1.3 The Amended Project

Several amendments are proposed for the Project in response to public submissions and agency advice received on the Project EIS during the exhibition period, along with technical advancements to the design of the Project. These amendments are all design refinements and do not materially change the nature of the Project.

A summary of the key proposed amendments to the EIS Project are provided in **Table 1.1** and are described in detail in the Amendment Report.

Table 1.1 Proposed Project Amendments

No.	Description
1	Construction staging amendments – BWF has identified that Stage Two (North) is now likely to commence sooner than was previously indicated in the Project EIS, and may commence prior to Stage One (South). As a result, a greater overlap between the construction periods for Stage One (South) and Stage Two (North) is now anticipated. Consequently, the peak workforce has increased from 350 workers at the height of construction as identified in the Project EIS, to 380 workers in this Amendment Report. As a result this amendment also reduces the overall duration of the construction period from 44 to 35 months.
2	Transport route amendments – The Amended Project encompasses two (2) port options, being Port of Newcastle (considered in the EIS but with impacts only being assessed for the "Local Transport Route" component) and Port Adelaide (a new port option considered in the Amendment Report). Accordingly, BWF is now seeking consent for any and all impacts associated with off-site road works and modifications between the nominated Ports and the Project Area, noting that consent associated with the SSDA is wholly limited to works within NSW. The Amended Project proposes five (5) Port to Hay Over-size Over-mass (OSOM) transport route options. This includes three (3) route options from the Port of Newcastle, and two (2) route options from the Port Adelaide.
3	WTG amendments – The Amended Project includes two (2) potential scenarios with respect to WTG dimensions. The Project EIS identified a maximum turbine size, being a tip height of up to 300 m and a blade length of up to 100 m. BWF has subsequently identified a maximum alternate turbine size (being a tip height of up to 233 m and a blade length of up to 80 m) for the purposes of identifying and assessing required road upgrades to the Port to Hay Transport Routes. However, BWF is seeking to retain flexibility to install a larger turbine (up to 300 m tip height and 100 m blade length), should the necessary Port to Hay upgrades be undertaken by the NSW Government or a third party.

No.	Description
4	Obstacle lighting amendments – The provision of obstacle lighting on select WTGs and meteorological masts (where masts are installed prior to WTG installation or are not in close proximity to a boundary WTG (>900 m) in accordance with CASA requirements.
5	Project design refinements - Includes the removal of two (2) WTGs, related infrastructure and associated disturbance from the Project design.

The scope of this report is limited to the transport route amendments and Project design refinements (item 2 and item 5 in **Table 1.1**). Accordingly, this updated Addendum ACHA has been prepared based on the current 141 WTG layout that resulted from changes in design in response to Government and agency advice received during the Amendment Report phase i.e. the removal of two (2) WTG from the Project design, being WTG 37 and WTG 38, as illustrated on **Figure 1.1**.

The removal of these WTG has made a neutral or marginally positive change with respect to Aboriginal cultural heritage impacts of the Project as outlined in the Revised ACHAR (Umwelt 2025) and has no influence on the assessment of transport route amendments addressed herein. H-NSW did not provide any advice in relation to this design change matter, but it has been incorporated into this updated Addendum ACHA for completeness and to ensure the latest design is represented.

1.3.1 Port to Hay Transport Routes - Off-site Road Works

The Amended Project proposes five (5) Port to Hay OSOM transport route options. This includes three (3) route options from the Port of Newcastle, and two (2) route options from the Port of Adelaide. Areas have been identified along the Port to Hay Transport Routes where road modifications would be required to enable the safe transport of Project components using OSOM vehicles. In some instances, these road modifications result in disturbance outside of the existing road pavement, which has warranted further assessment of relevant environmental constraints within the Amendment Report. This includes consideration of potential impacts to Aboriginal cultural heritage values within these off-site road work areas.

A summary of the relevant off-site road work areas subject to assessment in this Addendum ACHA is provided in **Table 1.2** and are illustrated on **Figure 1.2**. The off-site road works areas below are subject to further assessment given the extent of works proposed and location of the proposed works within areas with potential for Aboriginal cultural heritage values to be present. It is noted that the Amendment Report addresses off-site road work areas in addition to those identified below.

Table 1.2 Port to Hay Transport Route - Off-site Road Works Assessed in this Addendum ACHA

Off-site Road Works Area	Location	Description of proposed road modification	Chainage (km from Port)
Euston	Murray Valley Highway onto Sturt Highway at Euston, NSW.	Additional hardstand and associated fill required to bring new hardstand area level with the highway. Sign to be relocated.	546 km (Route 1)
Balranald	Right hand bend on Sturt Highway at Balranald, NSW.	Hardstand will be required on the outside of corner along with the removal of vegetation, light poles and numerous signs. Median strips to be made trafficable/replaced with painted lines.	623.7 km (Route 1)

Off-site Road Works Area	Location	Description of proposed road modification	Chainage (km from Port)
Hay	Roundabout on Sturt Highway at Hay, NSW onto Cobb Highway.	Several light poles and signs to be removed or relocated. Hardstand to be installed on exit of corner.	750 km (Route 1)

1.4 The Proponent

The proponent for this investigation is Bullawah Wind Farm Pty Ltd (BWF), a subsidiary of BayWa r.e. Based in 34 countries, BayWa r.e. is a leading global renewable energy developer, service provider, distributor and energy solutions provider, and is actively shaping the future of energy. BayWa r.e. delivers end to end project solutions, ongoing operations management and is an Independent Power Producer with an expanding energy trading business. BayWa r.e. has successfully brought over 5.5 gigawatts (GW) of renewable energy online, while managing over 10 GW of renewable energy assets.

Through its subsidiary, BayWa r.e. Projects Australia Pty Limited, BayWa r.e. has hubs in Brisbane, Melbourne and Sydney, focussing on delivering wind, solar, battery storage and hydrogen projects within Australia and New Zealand. BayWa r.e. Projects Australia has commissioned over 270 MW of solar and wind projects, and their project pipeline reports more than 5.7 GW under development. Key details of the Proponent are provided in **Table 1.3**.

Table 1.3 Proponent Details

Requirement	Details
Full Name/s	Bullawah Wind Farm Pty Limited
Street Address (Project Site)	4549 Jerilderie Road, Hay South, NSW 2711
ABN	ABN 15 660 244 182

1.5 Assessment Objectives

The overarching objectives of the Aboriginal cultural heritage assessment detailed in this report are as follows:

- To identify the Aboriginal cultural heritage values of select off-site road works areas (if present) using a combination of background research and targeted visual inspection.
- To provide, on the basis of significance and impact assessments, an appropriate management strategy for any potential cultural heritage values of the off-site road works areas.

1.6 Assessment Approach

The current assessment was undertaken with general reference to the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH [former], 2011). It is noted however, that preliminary assessment of the off-site road works areas indicated significant ground disturbance eliminating the requirement for systematic archaeological survey with reference to Requirement 5 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW [former] 2010). Notwithstanding the approach adopted for this updated Addendum ACHA included the following:

- Searches of the Aboriginal Heritage Information Management System (AHIMS) for all Aboriginal sites within the off-site road works areas (subject to assessment in this report) and surrounds.
- Review of the environmental context of the off-site road works areas and environs, with specific consideration to its implications for past Aboriginal land use.
- Review of relevant archaeological and ethnohistoric information for the off-site road works areas and environs.
- Visual inspection within the off-site road works areas.
- Significance and impact assessment, and development of management strategy.
- Preparation of this updated Addendum ACHA.

1.7 Native Title

The National Native Title Tribunal register contains determinations of native title made by:

- the High Court of Australia
- the Federal Court of Australia
- or a recognised body such as South Australia's Supreme Court and Environment Resources and Development Court.

A search of the National Native Title Tribunal register was undertaken on the 19 February 2025. No Native Title Claims and no Indigenous Land-Use Agreements (ILUAs) have been registered or notified by the National Native Title Tribunal as being in place over the off-site road works areas.

1.8 Project Team

Luke Wolfe (Principal Archaeologist, Umwelt) was the Technical Lead and primary author of the current assessment report. Management, coordination and technical support was provided by Tom Buchan (Umwelt, Senior Environmental Consultant), Lauren Evans (Umwelt, Principal Environmental Planner) and Nathan Baker (Umwelt, Principal Environmental Consultant).

1.9 Report Structure

This report contains 8 sections. This section (**Section 1.0**) has provided background information on the assessment undertaken and provides a description of the off-site road works areas. The remainder of the report is structured as follows:

- **Section 2.0** summarises the Aboriginal community consultation process undertaken for the broader assessment.
- **Section 3.0** summarises relevant environmental and landscape information for the off-site road works areas and environs.
- **Section 3.2** summarises relevant ethnohistoric information for the off-site road works areas.

- **Section 3.3** summarises relevant archaeological information for the off-site road works areas and environs.
- **Section 4.0** describes the results of the visual inspection.
- **Section 5.0** provides criteria for assessing significance for Aboriginal sites adopted for the Addendum ACHA.
- **Section 6.0** discusses the proposed activity and its associated impacts.
- **Section 7.0** outlines for the management recommendations for the off-site road works areas.
- **Section 8.0** lists the references cited in-text.

Details of where to locate the report content stipulated in the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH [former], 2011) are provided in **Table 1.4**.

Table 1.4 Heritage NSW Requirements Reference Table

Requirement	Refer to
How the requirements for consultation with Aboriginal people have been met (as specified in clause 80C of the National Parks and Wildlife Regulation 2019 (NPW Regulation))	Section 2.0
A description of the Aboriginal objects and declared Aboriginal places located within the area of the Project	Section 3.3 and Section 4.0
A description of the cultural heritage values, including the significance of the Aboriginal objects and declared Aboriginal places, that exist across the whole area that will be affected by the proposed activity and the significance of these values for the Aboriginal people who have a cultural association with the land	Section 5.1
The views of those Aboriginal people regarding the likely impact of the Project on their cultural heritage (if any submissions have been received as a part of the consultation requirements, the report must include a copy of each submission and your response)	Revised ACHA (Umwelt, 2025)
Actual or likely harm posed to the Aboriginal objects or declared Aboriginal places from the proposed activity, with reference to the cultural heritage values identified	Section 6.0
Any practical measures that may be taken to protect and conserve those Aboriginal objects or declared Aboriginal places	Section 7.0
Any practical measures that may be taken to avoid or mitigate any actual or likely harm, alternatives to harm or, if this is not possible, to manage (minimise) harm	

1.10 Copyright

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1.11 Revisions to this Addendum ACHA in response to Heritage NSW

The original Addendum ACHA was provided to Heritage NSW (H-NSW) by DPHI seeking advice on the assessment of the Amended Project. BWF has since received feedback from DPHI and relevant Government agencies on the Amended Project, including H-NSW. Advice was received from H-NSW as part of request for information (RFI) 2 (i.e. RFI 2), raised by DPHI on 27 May 2025 (and amended 23 June 2025).

This updated Addendum ACHA has been prepared to provide targeted responses to H-NSW's advice received during their assessment of the Amended Project, following direct consultation with H-NSW on 3 June 2025. **Table 1.5** below summarises the advice received and the responses provided, including references to specific sections of the report that have been updated accordingly.

Umwelt acknowledges that:

- Additional advice was received from H-NSW in relation to the 'Revised ACHA' i.e., the ACHA prepared to assess impacts at the main wind farm site.
- That additional H-NSW advice (i.e., items 1 to 8 of H-NSW advice received under RFI 2) is not relevant to the assessment of transport route amendments considered in this report, and is addressed separately in the Revised ACHA.
- Accordingly, only the H-NSW advice provided with regard to transport route amendments (and the Addendum ACHA) (i.e., items 9 to 12) is addressed the table below. Item 11 and 12 were provided in the context of the original Addendum ACHA within the H-NSW advice received under RFI 2, but relate to issues resolved in the Revised ACHA and RFI 2 responses to DPHI. They are reproduced below for completeness with summary responses provided, the remainder of the updated Addendum ACHA therefore focuses on item 9 and item 10 of the H-NSW advice.

Table 1.5 Response to Heritage NSW comments on the Addendum ACHA

Item No.	Comment	Response to H-NSW and location of updates
9	Section 2.0 of the Addendum ACHA states that "additional consultation was not undertaken specific to the assessment of the off-site road work areas, given the negligible likelihood of impacts to Aboriginal cultural heritage values." This is not supported by Heritage NSW as Aboriginal cultural heritage values continue to exist in disturbed landscapes and Aboriginal cultural heritage values cannot be identified, described or assessed without input from Aboriginal people. To address this matter, and ensure compliance with the requirements of the SEARs, please provide a copy of the Addendum ACHA to all RAPs. Evidence of this consultation and any responses received must be provided to Heritage NSW for our review/records.	This updated Addendum ACHA has now been provided to all existing Project RAPs. This is reflected in Section 2.0 . Evidence of this consultation has been provided to H-NSW separately, as necessitated by this and other H-NSW advice. H-NSW confirmed that adequate evidence of RAP consultation was provided via email on 6 August 2025. This outcome is formally recorded in the H-NSW 'DOC number' identified as 'DOC25/646215'.
10	Section 4.1 of the Addendum ACHA indicates that preliminary desktop review of the off-site road works areas consisted of a review of historical and contemporary aerial photography and mapping, however, this has not been presented in the report. As this desktop review informed the predictions and conclusions of the assessment, please update the report to include this assessment incorporating figures of the aerial imagery that have been analysed as part of this desktop review.	Umwelt has included the historical reference/aerial imagery used to support the desktop review within Section 3.1 of this report. Contemporary aerial imagery is provided in Figures 1.2A to Figure 1.2C .
11	We note that Mitigation Measure ACH02 in Appendix 3 (Updated Mitigation Measures) of the Amendment Report to refers to surface collection of 29 Aboriginal sites. In contrast, the updated assessment for the project (as per the revised ACHA and Addendum ACHA) indicate that surface collection is to occur at 27 Aboriginal sites if they cannot be avoided through micro-sitting. Please clarify this discrepancy and update for accuracy as required.	This issue has been addressed separately in an updated mitigation measures table, which has been prepared by Umwelt and provided to DPHI in response to RFI 2. We confirm that surface collection is to occur at 27 Aboriginal sites if they cannot be avoided through micro-sitting.
12	Please update management measure ACH07 in Appendix 3 (Updated Mitigation Measures) of the Amendment Report to refer to Table 9.4 of the Revised ACHA as the most up-to-date table that identifies the Aboriginal sites to which BWF has committed to avoiding and protecting from impact.	This issue has been addressed separately in an updated mitigation measures table, which has been prepared by Umwelt and provided to DPHI in response to RFI 2. ACH07 within the Projects updated mitigation measures now correctly refers to the most up-to-date table within the Revised ACHA that identifies the Aboriginal sites to which BWF has committed to avoiding and protecting from impact.

Note: Items 1 to 8 of H-NSW's advice are not relevant to this Addendum ACHA and are addressed separately in the Revised ACHA (version 3).

FIGURE 1.1
Amended Project Layout

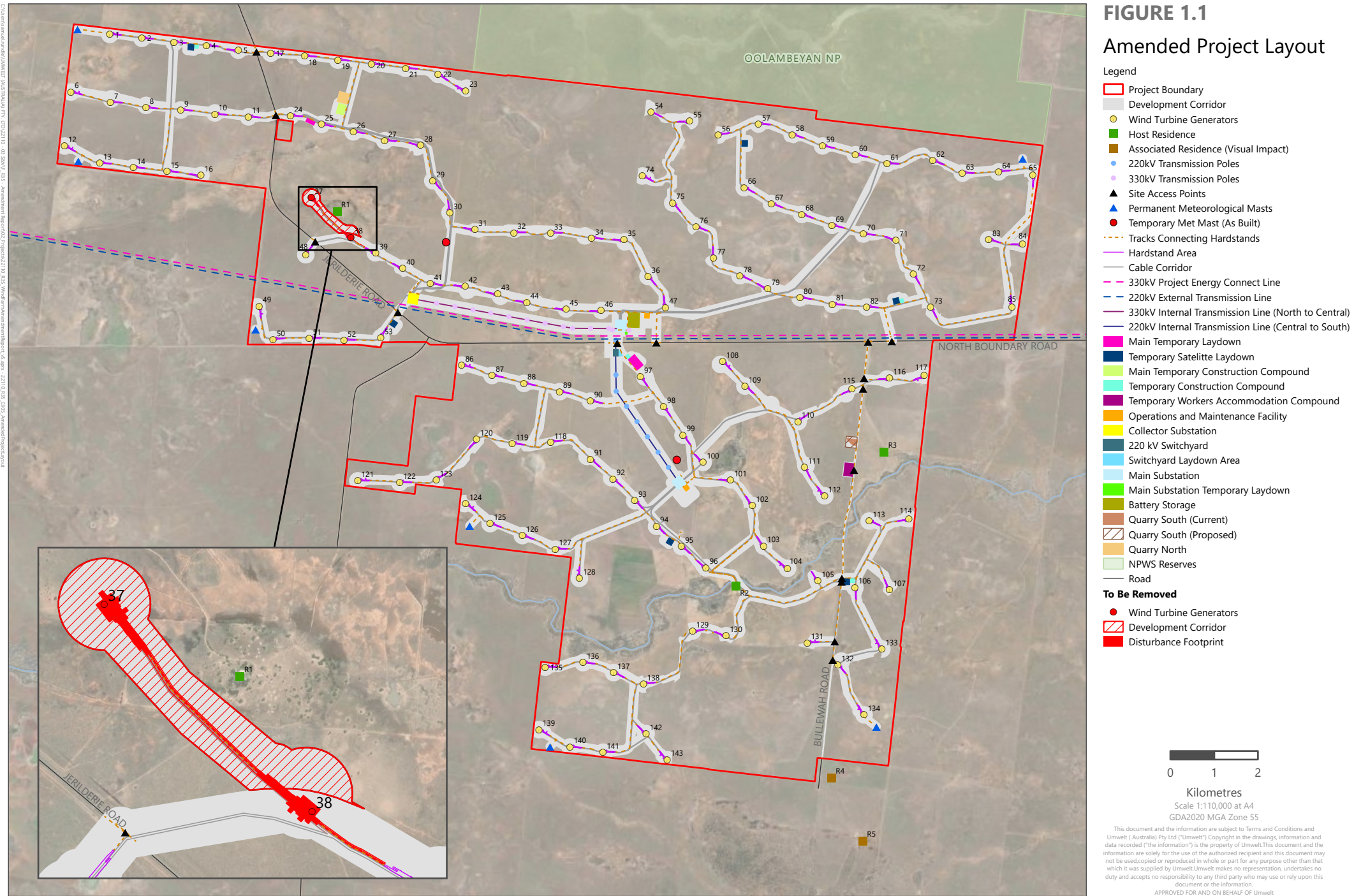
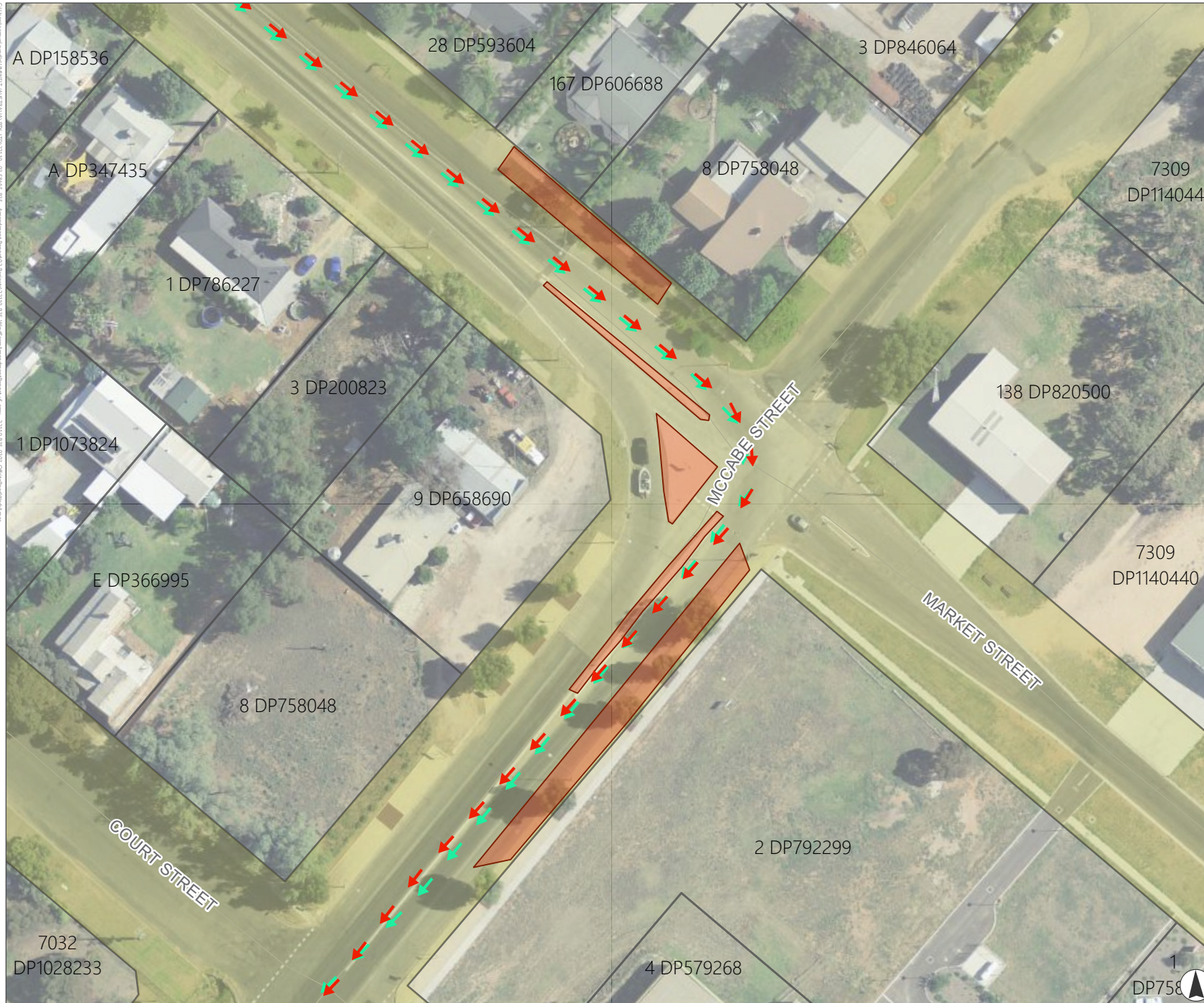


FIGURE 1.2A

**Port to Hay Transport Routes -
Off-site Road Work Areas
(Balranald)**

Legend

- Road
 - Lot/DP
 - NSW Road Corridor
 - Off-site Road Works Area - Balranald
- Port Adelaide Routes**
- Route 1 - 5.2m max loaded height - blades, motors, general loads
 - Route 2 - 6.5m max loaded height - towers



0 10 20

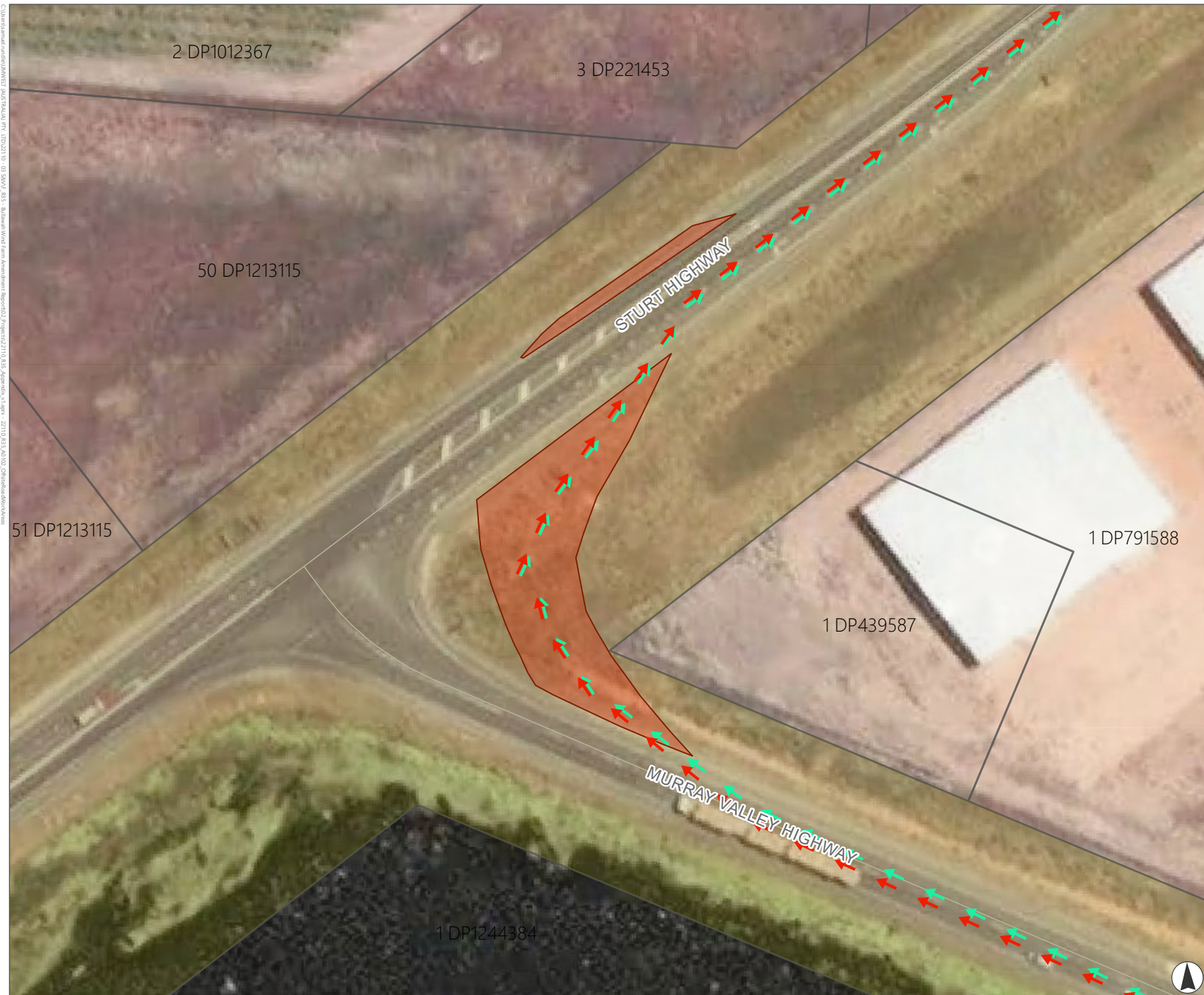
Metres

Scale 1:1,000 at A4
GDA2020 MGA Zone 55

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FIGURE 1.2B
 Port to Hay Transport Routes -
 Off-site Road Work Areas (Euston)



- Legend**
- Road
 - NSW Road Corridor
 - Off-site Road Works Area - Euston
- Port Adelaide Routes**
- Route 1 - 5.2m max loaded height - blades, motors, general loads
 - Route 2 - 6.5m max loaded height - towers



0 10 20
 Metres
 Scale 1:1,000 at A4
 GDA2020 MGA Zone 55

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FIGURE 1.2C

Port to Hay Transport Routes -
Off-site Road Work Areas (Hay)



Legend

- Road
- NSW Road Corridor
- Off-site Road Works Area - Hay

Port Adelaide Routes

- Route 1 - 5.2m max loaded height - blades, motors, general loads
- Route 2 - 6.5m max loaded height - towers

Port of Newcastle Routes

- Route 1 - 4.9m max loaded height - blades
- Route 2 - 6.1m max loaded height - towers
- Route 3 - 5.3m max loaded height - all remaining loads



0 10 20

Metres

Scale 1:1,000 at A4
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2.0 Aboriginal Party Consultation

Aboriginal community consultation acknowledges the right of Aboriginal peoples to be involved, through direct participation, on matters that directly affect their cultural heritage. Involving Aboriginal people in all facets of the assessment process ensures that they are given adequate opportunity to share information about cultural values, and to actively participate in the development of appropriate management and/or mitigations measures.

Aboriginal community consultation was undertaken for the Project EIS and associated ACHA (Umwelt, 2024) and then Submissions Report and associated Revised ACHA (Umwelt, 2025) with reference to the Consultation Requirements (DECCW, 2010a). Refer to Section 3 of the Revised ACHA for a full description of the Aboriginal Party consultation process, carried out in accordance with the Consultation Requirements (DECCW, 2010a). A consultation log and other information pertinent to the consultation program is provided in Appendix C of the Revised ACHA (Umwelt, 2025). Evidence of this consultation has been provided to H-NSW separately, as necessitated by its targeted advice relating to the Revised ACHA, as received under RFI 2.

The preparation of this updated Addendum ACHA did not warrant replication of the Aboriginal party consultation process, as this report is an extension of the Revised ACHA (Umwelt, 2025) which included comprehensive Aboriginal party consultation with Project RAPs.

However, in accordance with Stage 4 of the Consultation Requirements (DECCW, 2010a), and in response to H-NSW feedback on the Addendum ACHA (refer to **Section 1.11**), a draft version of the updated Addendum ACHA was supplied to all existing Project RAPs for review and comment on 14 July 2025. Evidence of this additional consultation has been provided to H-NSW separately, as necessitated by its targeted advice relating to the Addendum ACHA, received under RFI 2.

Feedback was received by the Konanggo Aboriginal Cultural Heritage Services, an existing Project RAP, on 29 July 2025. This feedback noted the report was '*very detailed*' and that '*a great deal of respect and consideration was given throughout the process*'. This feedback is documented in the RAP Consultation Log included in Appendix C of the Revised ACHAR (Version 3) (Umwelt 2025).

3.0 Background Review

The following sections outline the environmental, cultural and archaeological (local and regional) context of the off-site road works areas. This is informed by prior research and analysis completed for the Project Revised ACHA (Umwelt, 2025) and supplementary background review for this Addendum ACHA, as it applies to the areas in which ground disturbance works are proposed. Some information in this section is at a regional scale reflecting the broader Riverina Bioregion, which covers the both the Project Area (i.e. wind farm site) and the off-site road works areas. Locally specific information is then provided, where relevant.

3.1 Environmental Context

This section has been prepared for contextual purposes only, to provide an overview of the research and analysis completed for the Revised ACHA (Umwelt, 2025) and supplementary background review to inform this Addendum ACHA. Further detailed information about land use history, ethnohistorical information, environmental and geomorphological information and previous archaeological investigations can be found within the Revised ACHA (Umwelt, 2025).

Umwelt's review of the environmental context of the off-site road works areas and environs identified that these are principally located within the Murrumbidgee Subregion of the Riverina Bioregion (IBRA), comprising a plain of ancient riverine alluvial fans of unconsolidated sediments and displaying characteristics of paleochannels and ephemeral watercourses. The Riverina Bioregion is characterised by landscapes classified by Mitchell (2002), with the landscapes within the off-site road works areas including the Murrumbidgee Channels and floodplains and the Murrumbidgee Depression Plains.

The general topography and geology of the off-site road works area environs vary and generally comprise the following:

- Hay – topography and geology generally homogenous, comprising sandy plains to the south of the Murrumbidgee River.
- Balranald – topography comprises the elevated terrace and floodplains to the north of the Murrumbidgee River.
- Euston – topography comprises the broad flats and floodplain to the north of the Murray River.

Mapped soils of the Shepperton Formation are generally distributed across all three off-site road works areas, generally characterised by sandy soils that have potential to retain archaeological evidence within biomantle strata (i.e., topsoil), including evidence of hearths and surface and subsurface open artefact sites. However, significant prior ground disturbance associated with the off-site road works areas is confined to visually disturbed road-side verges which limit the likelihood of extant soils being present.

Water availability is a major influence on the range of resources available and the suitability of an area for Aboriginal occupation. The Murray and Murrumbidgee Rivers are the principal watercourses in the vicinity of the off-site road works areas, all three (3) generally falling within one (1) km of these two (2) rivers. The numerous recorded Aboriginal sites located within the Murray and Murrumbidgee River alluvial environs attest to their regional significance and foci for Aboriginal peoples occupying those areas. These alluvial environs would have supported the subsistence strategies, long term occupation and movements of Aboriginal peoples within the off-site road works areas. Pre-colonial vegetation communities in the Murray and Murrumbidgee River alluvial environs would have likely comprised open forest including river red gum (*Eucalyptus camaldulensis*), river cooba (*Acacia stenophylla*), cooba (*Acacia salicina*), lignum (*Muehlenbeckia cunninghamii*), nitre goosefoot (*Chenopodium nitrariaceum*), with Cumbungi (*Typha orientalis*), common reed (*Phragmites australis*) and nardoo (*Marsilea drummondii*) occurring in flooded depressions. Clearing of vegetation for grazing as well as the introduction of ungulates species and pests such as rabbits and foxes, would have vastly changed the faunal landscape. However, consideration of pre-European vegetation regimes suggests that a range of terrestrial faunal resources would have been present in the area. Locally occurring resources from freshwater environs, for example, are likely to have consisted of localised fish such as the trout cod (*Maccullochella macquariensis*), Macquarie perch (*Macquaria australasica*) among others. The freshwater rivers and wetlands also would have supported a diverse array of terrestrial mammals. A range of species of birds, reptiles, and amphibians would have also been available in open woodland areas as well as shrub and grasslands.

Factors such as erosion from the introduction of introduced species including grazing animals associated with historical agricultural practises, urbanisation and road construction activities have likely resulted in localised impacts on the archaeological record within the off-site road works areas. Contemporary vegetation communities generally now comprise extensive grasslands of white-top, windmill grass, sand broom, and spear grasses (Mitchell 2002). As with vegetation, determining the pre-European occupation faunal landscape of the and environs is difficult to determine with any certainty due to past land use. Natural vegetation communities within the off-site road works areas have been extensively cleared to accommodate activities associated with historical agricultural processes, and more recently road corridors, verges, footpaths and other associated infrastructure. A review of historical and contemporary aerial photography for the off-site road works areas supports the initial observations of land-use and ground disturbing activities. Aerial photography from 1950 (**Figure 3.1**) indicates the roundabout and roads that are present today in the Hay off-site road works area were already in place, and appear generally consistent with its present-day footprint. Roadside vegetation appears to be entirely absent, suggesting pre-1950s vegetation clearance and all present-day vegetation was the result of subsequent planting activities.



Figure 3.1 Aerial photograph of Hay indicating current roads and roundabout constructed prior to 1950. Vegetation along road boundaries appears to be absent. Image source: Geoscience Australia 2025.



Figure 3.2 Aerial photograph of Balranald (1964) with roads consistent with their present-day alignment. Vegetation along road boundaries appears to be generally absent with the exception of the eastern verge of the Sturt Highway. Image source: Geoscience Australia 2025.

Reference to aerial photography from 1964 shows road alignments in the Balranald off-site road works area to be generally consistent with the present-day alignment (**Figure 3.2**). Vegetation is generally absent, suggesting the majority of present-day vegetation along the road verge was the result of post-1960s landscaping activities, with the exception of approximately eight juvenile trees along the eastern boundary of the Sturt Highway, suggesting recent (c.10 years) since establishment.



Figure 3.3 Aerial photograph of Euston (1983) with roads consistent with their present-day alignment. Vegetation along road boundaries appears to be generally absent. Image source: Geoscience Australia 2025

Reference to aerial photography from 1983 also shows road alignments in the Euston off-site road works area to be generally consistent with the present-day alignment (**Figure 3.3**), with vegetation within the road verge environs entirely absent. Large areas of exposed soil are evident in the north-eastern portion of the Euston off-site road works, at the corner of the Sturt Highway and Murray Valley Way, suggesting the likelihood of earthworks associated with the construction of embankments for road elevation has occurred prior to this time.

3.2 Cultural Context

Mapping undertaken by Tindale (1974) indicates the off-site road works areas generally intersects with the traditional lands of the Nari Nari, Muthi Muthi and Kureinji peoples, with the Hay off-site road works area located near the western border of what is considered the traditional lands of the Wiradjuri people. Previous ethnographic investigations have posited that these languages form one larger language group; the Kulin language (Schmidt, 1919) of which at least the Nari Nari language groups were considered a sub-group (Hercus, 1989). There exists substantial debate on the origins, inter-relatedness, and connectivity of the languages of the region (Hercus, 1989; Blake *et al.*, 2011), however local archaeological investigations have continued to refer to the Nari Nari language group as being a part of the Kulin language group (e.g. Pardoe and Martin, 2001).



Figure 3.4 Map indicating the distribution of the Aboriginal language groups of Australia, after Tindale (1974). Approximate location of Off-Site Road Works Areas indicated in yellow.

The chronology of Aboriginal occupation of the Murrumbidgee Province is analogous to the Willandra Lakes and Lake Mungo approximately 180 km to the northwest, with ages of Aboriginal sites reaching over 45,000 years BP (Bowler, *et al.*, 2003). Despite this, the antiquity of the off-site road works areas is characterised by Holocene patterns of occupation, with Aboriginal ancestral remains along the Murray River (shown black in **Figure 3.4**) dated to approximately 10,000 years BP (Pardoe, 1988; 1995). From the terminal-Pleistocene, the Murray and Murrumbidgee Rivers transitioned from wide, shallow rivers, to a narrower and more sinuous pattern, resulting in the development of small lagoons, billabongs, and swamps (Mulvaney and Kamminga, 1999: 302–3). The wetlands that developed through the early- to mid-Holocene were resource-rich, with plentiful fauna and flora for local populations developing a semi-sedentary pattern of occupation that extended through the Holocene. The variable and volatile climate of the mid- to late-Holocene would have compromised the abundance of resources of the early- to mid-Holocene favorable climatic conditions (e.g. Williams *et al.*, 2010; Gliganic *et al.*, 2014). Droughts increased in intensity and frequency, drying water bodies and leaving fauna relied upon as food resources to leave the area, becoming dormant until wetter conditions returned, or perished. Despite the periodic paucity of food resources, the Murray, Lachlan and Murrumbidgee Rivers would have remained as the focal point for Aboriginal occupation though to the early 19th century as European colonists first encroached into the region (Beveridge, 1883; Mulvaney and Kamminga, 1999; Pardoe and Martin, 2001).

Regionally, the Murray, Lachlan and Murrumbidgee Rivers and their associated tributaries were deeply connected to the cultural and spiritual lifeways of Aboriginal peoples of the Riverina Bioregion, providing valuable food and water resources, but also traveling routes and songlines. The off-site road works areas and surrounds feature a suite of microenvironments, ecologies, and topographies, affording ample accessibility to a broad range of resources (Pardoe, 2003). Resource-rich watercourses provided staple foodstuffs, including bulrush roots (*balyan*), which were collected from within the reeds roasted over a fire, or the rhizomes extracted for consumption (Mitchell 1839). Fish and other freshwater aquatic life were an essential protein sources, including as perch, Murray cod, shellfish, frogs, and yabbies. Such foods would have been abundant in interior lake systems until around 26,000 years ago when lakes throughout the country began to dry out as a result of increased temperature.

This patterning contributed to the semi-sedentary description of Aboriginal peoples occupying the Riverina Bioregion, to the point of substantial genetic isolationism when compared to communities elsewhere in the continent (Mulvaney and Kamminga 1999, pp.306–307). Certainly, neighboring Wiradjuri peoples were recorded as being semi-nomadic and moved their camps throughout their range of about 40 km in radius according to the availability of food resources throughout the seasons (McDonald, 1993). Andrews (1920, p.35) explained that Wiradjuri peoples *“usually chose a cleared space for their camps, in the neighborhood of water, as fish and birds were their principal articles of food”* and *“although these camps must have been continuously used for long periods by large numbers, but little trace is left”* (Andrews, 1920, p.35). In 1844, George Augustus Robinson counted 50 huts with about 250 inhabitants while travelling through Wiradjuri Country (Robinson, n.d.). The extent to which these shelter types were used is uncertain; however, it would be dependent upon the availability of both the materials for building huts. Camp sites would often be some distance back from rivers or creeks, under trees and close to firewood (A. McDonald, 1993).

Within Nari Nari, Baraparaapa and Wiradjuri (western) Country, trade and communication networks remained robust, despite harsher seasonal hardships. Necessity, however, did require a broader network. The paucity of raw materials amenable to stone tool making in the immediate environs of the off-site road works areas, for instance, necessitated the trading of quality stone and importation into the region. Greenstone, for example, was traded from Central Victoria for the manufacture of edge-ground axes (Brumm, 2010) while fine grained-silcrete was often traded from the Willandra Lakes Region (Schmidt and Hiscock, 2020). In such cases, specific members of the community who could speak other languages (*Ngalla Wattow*) would travel to facilitate trade and between groups (Beveridge, 1884) and were afforded special protections from neighboring communities in the undertaking of their roles. Such a robust network of inter- and intra-connectedness also facilitated the spreading of disease resulting from European colonialism. In a pattern observed across the continent, diseases such as smallpox ravaged Aboriginal communities. In some instances, smallpox reached Aboriginal communities before they had come into direct contact with Europeans (Campbell, 1985).

3.3 Regional Archaeological Context

Archaeological research regarding the chronology of occupation within the Riverina Bioregion draws much from Lake Mungo and Willandra Lakes, located approximately 180 km to the north west of the Project Area. Sites around Lake Mungo have revealed human occupation within the region from approximately 50,000 years BP, and the oldest formal burials of Aboriginal ancestral remains from 40,000 years ago (Bowler *et al.*, 2003). In contrast, the archaeology of the off-site road works areas and its immediate surrounds follows a typically Holocene pattern of occupation, with the oldest dated sites being Kow Swamp B (Thorne, 1975) and Coobool Creek (Brown, 1989) both returning ages of approximately 13,000 to 9,000 years BP. Mound formation that characterises the Riverina Bioregion cultural landscape is thought to have initiated in the mid-Holocene from approximately 5,000 years BP, increasing in abundance from approximately 2,000 years BP (Martin, 2011; Roberts, *et al.*, 2022). Aboriginal ancestral remains dating to the mid-Holocene have also been recorded (e.g. Pardoe, 1995).

Pardoe and Martin (2001, pp.103-119), in a comprehensive review of the cultural landscape of the Murrumbidgee Province¹ of the Riverine Plain, proposed a regional predictive model for the location and character of Aboriginal sites. Water sources were noted as a key nexus point for past Aboriginal activities, with occupational frequency dropping substantially with distance away from water sources. Major concentrations of Aboriginal sites were, in general, located where palaeochannels and modern-day major river systems intersect. In these instances, mounds and an increase in Aboriginal ancestral remains were often observed, potentially some have been interpreted as cemeteries rather than a cluster of unrelated burying of ancestral remains (e.g. Littleton, 2002). Observations by Martin (2007) expand on the predictive model set by Pardoe and Martin (2001), and include:

- Archaeological site types are considered more likely to occur on sandy paleochannel features of relatively elevated topographies.
- Open sites are more commonly encountered away from riverine grey cracking clays.
- Artefact scatters and camp ovens (i.e. hearths) are widely spread across the Murrumbidgee Province
- Sites containing Aboriginal ancestral remains appear to cluster in the western extent of the Murrumbidgee Province.

Generally, raw material availability and poor-quality compromises the production of ‘classic blades’ (Pardoe and Martin 2001, p.89). Blades and scrapers are generally <20 mm in size. Ground stone implements including grinding stones, mortars and pestles are found across the Murrumbidgee Province, though are most likely found in closer to proximity to the river floodplain (Pardoe and Martin 2001, p.98).

Edge ground axes, including fragments, are occasionally found, and most commonly in association with mounds. It should be noted that no sources of greenstone are known in any close proximity to the off-site road works areas, though sources at Mt. William are known, potentially indicating the extent of mobility and trade networks of the region (e.g. Brumm 2010).

¹ Comprising 3,043,775 ha of land located in NSW between approximately 30 km west of Balranald (west) and Narrandera (east), inclusive of the current Project Area (*sensu* Pardoe and Martin 2001).

3.4 Local Archaeological Context

The Aboriginal Heritage Information System (AHIMS) database, administered by Heritage NSW, contains records of all Aboriginal objects reported to Heritage NSW in accordance with Section 89A of the NPW Act. It also contains information about Aboriginal places, which have been declared to have Aboriginal cultural significance. Recorded Aboriginal objects and declared Aboriginal places are defined under the NPW Act as 'Aboriginal sites'.

A search of the AHIMS register was undertaken on 26 February 2025 covering an approximate 5 km buffer centred on each of the off-site road works areas (i.e., the 'AHIMS search area'; AHIMS searches) identified 48 Aboriginal sites, as shown in **Table 3.1**. Records of these searches are provided in **Appendix A** of this report.

As is typical for near-alluvial environs within the Riverina Bioregion, culturally modified trees (i.e. trees exhibiting cultural modification, scarring or carving) were the most common site type represented within the AHIMS search area, accounting for 64.6% (n=31) of known sites. Typically, those culturally modified trees reported in the AHIMS search results were recorded near the Murray River and associated environs. Aboriginal ancestral remains (i.e. burials/skeletal remains), sites containing shell (i.e. 'middens') and earth mounds were comparatively less common, each accounting for 8.3% (n=4) of the total search results. Like culturally modified trees, these sites were typically located near major watercourses. Open artefact sites (comprising one or more stone artefacts, with or without associated areas of potential archaeological deposit (PAD) and/or secondary features were comparatively less common, accounting for 4.3% of the AHIMS search results.

While sites containing lithic objects are typical for south-eastern Australia, the paucity of recorded open artefact sites within the AHIMS search area can likely be attributed to the absence of targeted compliance-based and/or other assessments in the AHIMS search area that would otherwise typically result in such sites being recorded. A single area of potential archaeological deposit (PAD) and a single hearth, each accounted 2.1% of the AHIMS search results. The singular instance of the former, like open artefact sites, is likely attributed to the overall paucity of archaeological assessments within the AHIMS search area. Hearths, will generally uncommon, can also be challenging to identify but are often found in association with alluvial environs. A single conflict site, representing a location of colonial conflict with Aboriginal peoples, was reported within the AHIMS search area. Such sites are generally uncommon, and where present, are often significant to Aboriginal people as a historical reminder of colonial impacts on local traditions.

Table 3.1 AHIMS Search Results

Site Type	Count (n)	Percentage
Culturally Modified Tree	31	64.6%
Ancestral Remains	4	8.3%
Midden	4	8.3%
Earth Mound	4	8.3%
Open Artefact Site	2	4.2%
Conflict Site	1	2.1%
PAD	1	2.1%
Hearth	1	2.1%
Total	48	100.0%

Of those Aboriginal sites reported in the AHIMS search results, none were reported within the off-site road works areas. As shown in **Figure 3.5(A-C)**, the nearest Aboriginal site/s reported near the Hay off-site road works area were located approximately 600 m to the north. A cluster of sites, generally comprising culturally modified trees, midden site and an ancestral burial, were all located on the northern bank of the Murray River environs. Four (4) sites were located within 200 m of the Balranald off-site road works area, comprising three (3) culturally modified trees and a single (1) earth mound. Two (2) sites were located approximately 800 m – 1.2 km south of the Euston off-site road works area, comprising a hearth and open artefact site, respectively.

3.4.1 Australian Heritage Database

The Australian Heritage Database contains information about more than 20,000 natural, historic and Indigenous places. The database includes heritage places registered on the following:

- World Heritage List.
- National Heritage List.
- Commonwealth Heritage list.
- Register of the National Estate (archived).

A search of the Australian Heritage Database was undertaken on 26 February 2025. The Australian Heritage Database does not currently list any items, objects or places of Aboriginal cultural heritage in or within 500 m of any of the off-site road works areas. Three (3) Indigenous Places' listed on the Register of the National Estate for the Balranald environs. No information regarding the listings is available, and it is noted that the Register of the National Estate is no longer a statutory heritage list. It is likely that two of the three listings are listed in the State Heritage Inventory, discussed in **Section 3.4.2**.

3.4.2 NSW State Heritage Inventory

The State Heritage Inventory (SHI) includes places and items listed on the NSW State Heritage Register (SHR), LEPs, s170 registers, and interim heritage orders. A search of the SHI was undertaken on 26 February 2025. The SHI identified two (2) places of Aboriginal cultural heritage registered in the vicinity of the Balranald off-site road works area, though sufficiently distant to not result in any direct and/or indirect impacts. Details of the two (2) places are provided in **Table 3.2** below.

Table 3.2 Aboriginal Places

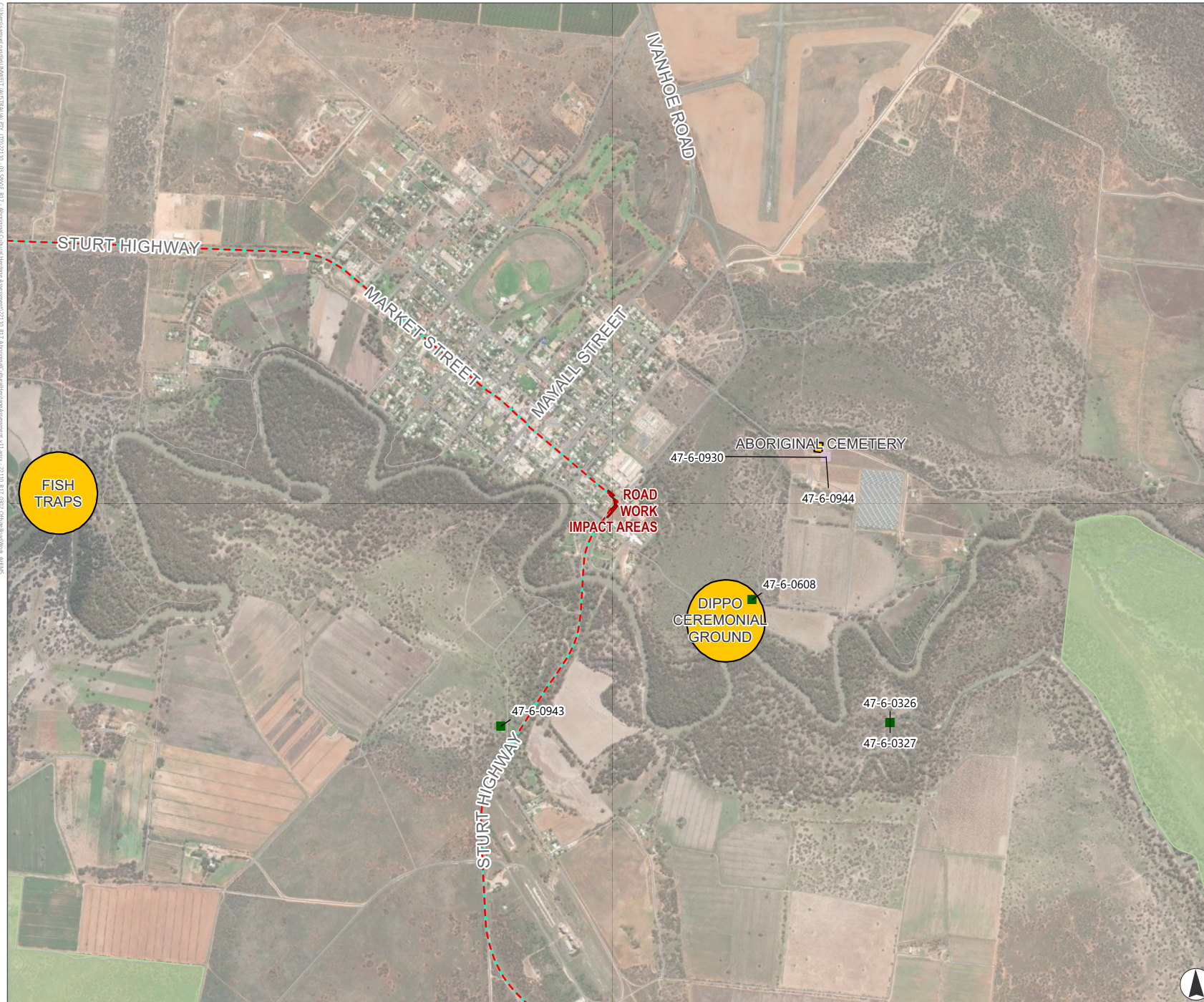
Aboriginal Place name	Description	Distance from Off-Site Road Works Area (m)
Dippo Ceremonial Ground	The Dippo Ceremonial Ground Aboriginal Place is located south east of Balranald District Hospital, and is bordered to the south by the Murrumbidgee River. The place contains a birthing tree and is understood to be the location where the last farewell corroboree took place in 1919 and was a traditional camping place for Muthi Muthi people and other Aboriginal groups into the 1930s.	700 m southeast of the Balranald off-site road works area.
The Island (Poonyea) Aboriginal Reserve	The Island is located between the Murrumbidgee River and Yanga Creek, recorded in 1852 as 'Poonyea'. The Island Aboriginal Place is of special significance to Aboriginal people as the location of an Aboriginal Reserve created in 1892, as well as the resting place for multiple ancestral remains.	1,300 m southeast of the Balranald off-site road works area.

3.5 Native Title

A search of the National Native Title Register (NNTR) and Register of Native Title Claims (RNTC) administered by the National Native Title Tribunal was undertaken for the off-site road works areas and surrounds. No Native Title Claims and no Indigenous Land-Use Agreements (ILUAs) have been registered or notified by the National Native Title Tribunal as being in place over the off-site road works areas.

FIGURE 3.5A

Aboriginal Sites - Off-site Road Work Areas (Balranald)



Legend

Off-site impact area - Balranald

Road

NPWS Reserves

Heritage

Item - Aboriginal

AHIMS Search Results

Ancestral Remains

Culturally Modified Tree

Port Adelaide Routes

Route 1 - 5.2m

Route 2 - 6.5m



Metres

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FIGURE 3.5B

Aboriginal Sites - Off-site Road Work Areas (Euston)

Legend

Off-site impact area - Euston

Road

AHIMS Search Results

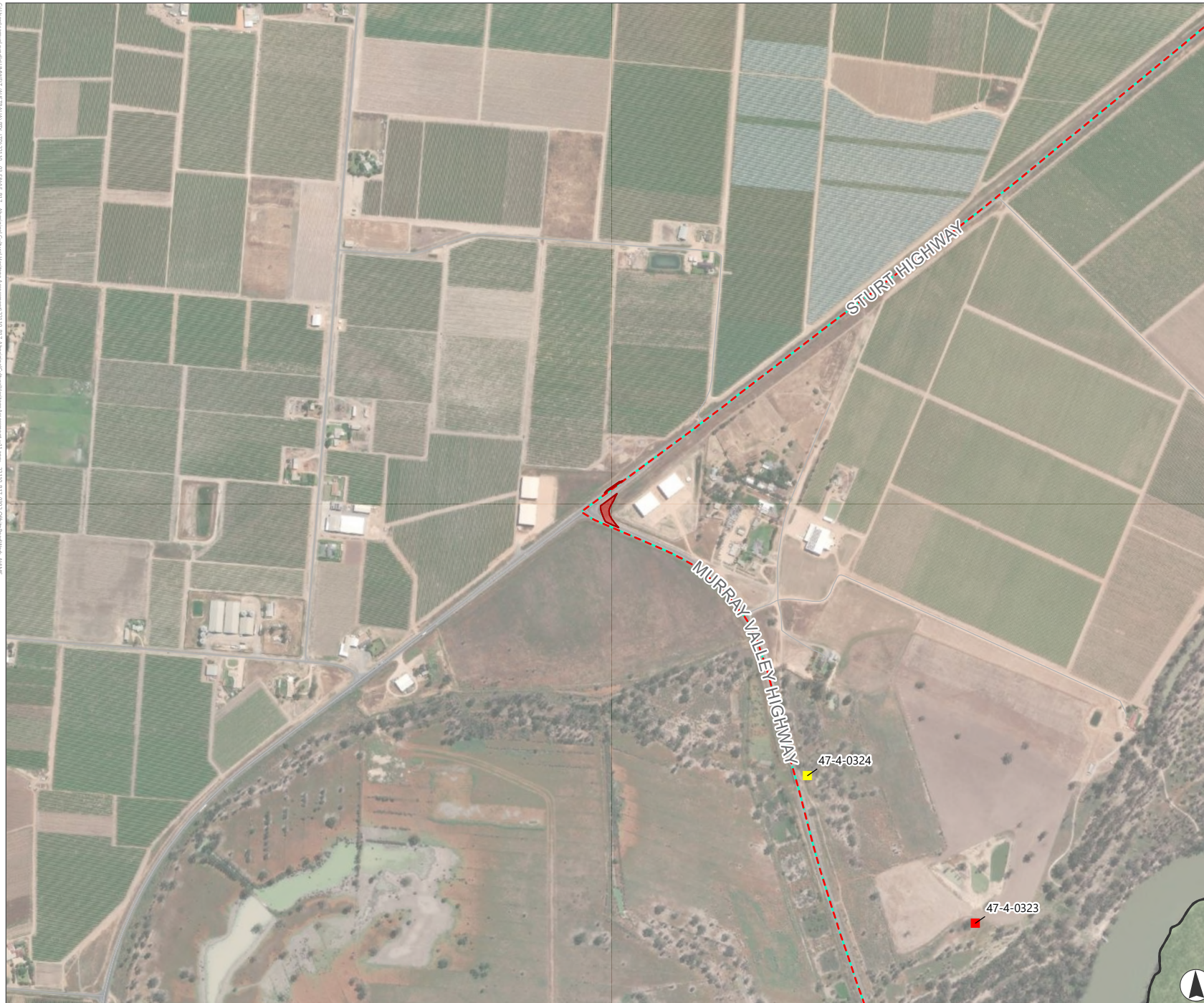
■ Hearth

■ Open Artefact Site

Port Adelaide Routes

Route 1 - 5.2m

Route 2 - 6.5m



Metres

Scale 1:12,000 at A4
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FIGURE 3.5C
Aboriginal Sites - Off-site Road
Work Areas (Hay)



- Legend**
- Off-site impact area - Hay
 - Road
 - NPWS Reserves
- AHIMS Search Results**
- Conflict Site
 - Culturally Modified Tree
 - Earth Mound
 - Midden
 - Open Artefact Site
- Port Adelaide Routes**
- Route 1 - 5.2m
 - Route 2 - 6.5m
- Port of Newcastle Routes**
- Route 1 - 4.9m
 - Route 2 - 6.1m
 - Route 3 - 5.3m



Metres

Scale 1:15,000 at A4
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3.6 Archaeological Predictions

The review of existing environmental and archaeological context for the off-site road works areas and regional environs presented in earlier sections of this report and the Revised ACHA for the Project (Umwelt, 2025) identify evidence of widespread Aboriginal occupation and associated activities. Central to the prediction of Aboriginal site distribution across a landscape, Aboriginal lifeways, are in part, reflected in landscape and environment variables. Evidence of Aboriginal occupation of the Riverina Bioregion from approximately 50,000 years BP attests to the adaptability of peoples across a variety of environmental and climatic conditions, which is subsequently reflected in the archaeological record.

At varying times, the off-site road works areas and environs likely contained potable water, would have been rich in edible resources and the broadly flat topography would have provided ample habitation sites and facilitated regional travel. The distribution of recorded Aboriginal sites in the general environs of all three (3) off-site road works areas generally attests to peoples targeting elevated landform elements (i.e. dunes and alluvial terraces) adjacent to major rivers which would have provided access to ample freshwater resources and travelling routes. Lithic artefact sites have been extensively recorded in the broader region, though notably absent within the AHIMS search area (attesting to the paucity of compliance-based and/or other archaeological assessments in those areas). Typically located on elevated, level, and well-drained topographies (i.e. dunes) proximal to reliable sources of freshwater. Higher concentrations of lithic artefacts meanwhile, will generally be associated with landform elements adjacent to higher order watercourses and creek confluences. Often associated with open artefact sites, hearths have also been extensively recorded in the broader region though also notably absent in the AHIMS search area. Generally also associated with domestic activities, hearths will often be located on elevated, level, and well-drained topographies (i.e. dunes) proximal to reliable sources of freshwater. Recorded hearths, where present, will also vary in level of integrity, ranging from intact concentrated clusters of clay and/or stone heat retainers to highly dispersed and fragmented heat retainers with no clear foci. Culturally modified trees (scarred, carved and/or otherwise modified) are common site in the region and the most common site type reported in the AHIMS search area. These are often associated with the interment of ancestral remains, birthing practises and landscape/resource, territorial, or cultural markers. Due to extensive vegetation clearance within the off-site road works areas, the survivability of culturally modified trees will likely be negligible.

While uncommon, earth mounds have been recorded within the AHIMS search area. Like open artefact sites and hearths, earth mounds are often associated with domestic activities and will be present on elevated, level and well-drained topographies (i.e. dunes) proximal to reliable sources of fresh water. Mound formation is generally accepted as the result of repeated hearth cooking activity occasioning the agglomeration of oven structures and so earth mounds may be found near hearths. While the repeated baking of clays and surrounding soils may harden and consolidate sediments, promoting erosion resistance, like culturally modified trees, the survivability of earth mounds is often related to historical landscape practises and surviving evidence may be present as highly dispersed and/or deflated expressions of baked clay, charcoal and secondary evidence (e.g. artefacts, bone etc). Shell midden sites have likewise been reported within the AHIMS search area, albeit in low numbers. Reference to available literature suggests middens are generally identified adjacent to riverine and lacustrine environments but may also be identified in similar contexts to domestic sites (i.e. hearths, open artefact scatters, earth mounds).

Aboriginal ancestral remains (burial) sites have been recorded within the AHIMS search area, albeit in relatively low numbers. Reference to literature for the Riverina Bioregion suggests a trend of Aboriginal ancestral remains being found further away from water sources, whereas clusters of ancestral remains are often found in closer proximity to major watercourse, with intact sand dunes >2 m being more likely to retain Aboriginal ancestral remains.

Rockshelter sites containing art and/or archaeological deposit, grinding grooves and raw material quarries are likely to be absent within the off-site road works areas. Reference to geological mapping suggests that raw material and bedrock sources within the off-site road works areas and environs are absent. Secondary sources (e.g. watercourses, alluvial deposits) may contain opportunistic gravels.

There is no record of ceremonial and Dreaming sites within the AHIMS search area. Generally, ceremonial and Dreaming sites are associated with traditional/cultural practises and deeply rooted in mythology and religion. To date, no known recorded Dreaming stories for the off-site road works areas and immediate environs have been identified. A single contact site reported within the AHIMS search area is known to occur in the general environs of the off-site road works area, comprising a conflict site associated with early colonial interactions. Additionally, two registered ceremonial Aboriginal Places are located approximately 1 km from the Balranald off-site road works area.

With reference to the predictions presented above, and review of the specific environs of each of the is anticipated that extant Aboriginal sites are unlikely to be present within the footprint of the off-site road works areas.

4.0 Fieldwork

4.1 Objectives and Methods

The following sections present a summary of the fieldwork for this Addendum ACHA. Preliminary desktop review of the off-site road works areas (comprising review of historical and contemporary aerial photography and mapping) indicated that all three areas were located in highly disturbed road corridors. Following the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (Department of Environment, Climate Change and Water 2010), where relevant confirmed site records or other associated landscape feature information (i.e. desktop assessment) and/or other sources of information can indicate that the presence of Aboriginal objects is unlikely, further archaeological assessment is generally not required. However, for the Addendum Assessment, Umwelt adopted the prescribed guidance of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* and *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* to inform the assessment process and inform the assessment of cultural values (if present). Accordingly, the approach and method adopted to meet the archaeological objectives comprised a targeted visual inspection based on information obtained from the desktop assessment to ground-truth the supposition that there was a low likelihood of extant Aboriginal sites being present. All visual inspections were conducted on foot by Umwelt Principal Archaeologist Luke Wolfe.

The location of the visual inspection was recorded using a handheld differential GPS unit, with associated inspection notes entered directly into the same unit upon the completion. Typically, road verges that exhibited clear evidence of earthworks, grading or embankment construction were recorded as disturbed, where relevant.

4.2 Results of Visual Inspection

Targeted visual inspection of the off-site road works areas did not identify any new Aboriginal sites and/or areas of PAD. All off-site road works areas were generally restricted to road verges and surrounding environs. Area specific results are presented below:

Euston – The corridor along Murray Valley Highway generally comprised the elevated road verge which appeared to have been subject to historical earth works to raise the area above the surrounding flood-prone land and appeared to be visually disturbed with fill material, building waste and general rubbish evident. Existing drainage infrastructure was observed on near the Murray Valley Highway and appeared to extend under the Sturt Highway to the west. Other subsurface infrastructure (fibre optic/comms) was also observed. No Aboriginal objects and/or archaeologically sensitive landscape features were identified.



Photo 4.1 **Northeastern side of Euston Off-Site Road Works Area bordering Murray Valley Highway**

View west. Source: Umwelt 2025



Photo 4.2 **Northeastern side of Euston Off-Site Road Works Area**

Note existing subsurface assets and drainage infrastructure. View north. Source: Umwelt 2025

Balranald – The corridor along Market Street and McCabe Street generally comprised the existing road infrastructure with soft landscaped road verges comprising grass and gravelled surfaces. Where ground surfaces were visible, topsoil was generally absent with clayey soils exposed. Ornamental plantings on the western and eastern road verges of McCabe Street comprised mature (approximately 40–50 years old) mixed Eucalyptus species. No cultural modifications were observed in any trees inspected. No Aboriginal objects and/or archaeologically sensitive landscape features were identified.



Photo 4.3 **Southern side of Balranald Off-Site Road Works Area along Market Street**

Note soft landscaping along road verge, guttering and existing road infrastructure. View east. Source: Umwelt 2025



Photo 4.4 **Western side of Balranald Off-Site Road Works Area along McCabe Street**

Note soft landscaped road verge and ornamental plantings along both western and eastern verges of McCabe Street. View east. Source: Umwelt 2025

Hay – The corridor along Cobb Highway Street comprised the existing road infrastructure with soft landscaped road verges comprising grass and gravelled surfaces with ornamental plantings set back from the road verge, approximately 5-10 m. A formed concrete median barrier extended north towards a large roundabout (the ‘South Hay Roundabout’) at the intersection of Cobb Highway and Moama Street. The roundabout comprised a depressed drainage basin inset with soft landscaping and ornamental plantings.

No cultural modifications were observed in any trees inspected along the road verges immediately adjacent to the Hay off-site road works area. No Aboriginal objects and/or archaeologically sensitive landscape features were identified.

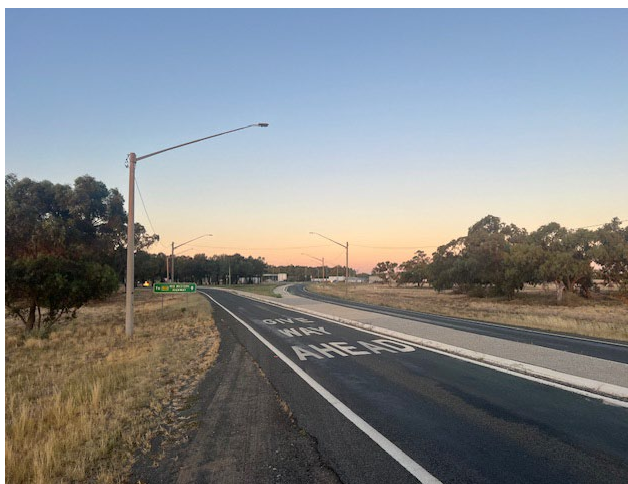


Photo 4.5 Western side of Off-Site Road Works Area along Cobb Highway Street

Note soft landscaped road verge and ornamental plantings along both western and eastern verges of Cobb Highway, beyond the boundaries of Off-Site Road Works Area Street. South Hay Roundabout visible in background. View north. Source: Umwelt 2025



Photo 4.6 Eastern side of Off-Site Road Works Area along Cobb Highway Street

Note street lighting on road verges. View northwest. Source: Umwelt 2025

5.0 Significance Assessment

The Burra Charter defines cultural significance in terms of aesthetic, scientific, historic and social values. Aboriginal cultural heritage is typically assessed according to its social and scientific significance; however other values may also be of importance. The assessment of cultural significance is critical in establishing mitigation and management strategies for cultural heritage (Pearson and Sullivan, 1995:21).

The assessment of significance provides a guideline for determining appropriate mitigation and management strategies. The relationship between levels of significance and management strategies can be summarised as follows:

- **High significance** – the site should be conserved and protected from the impacts of development, where possible.
- **Moderate significance** – the site should be protected if possible, however, if impacts to the site are unavoidable, appropriate mitigation strategies should be implemented prior to impact.
- **Low significance** – the site should be protected if possible, however, if impacts to the site are unavoidable, the presence of the site should not impede the proposed development.

5.1 Cultural Significance

Cultural significance relates to the values that Aboriginal peoples assign an object, site or place. In assessing this significance, a range of factors may be considered, and this can extend beyond the physical presence of a site and its contents to intangible aspects of the cultural landscapes. Archaeological materials, cultural knowledge, natural resources and landscape attributes may all be considered.

Aboriginal community consultation was undertaken to support the Project EIS and associated ACHA (Umwelt, 2024), and then Submissions Report and associated Revised ACHA (Umwelt, 2025) in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*. The program of consultation identified both tangible and intangible cultural values associated with the Project Area and broader Riverina Bioregion. The following social or cultural values documented from conversations with Umwelt personnel remain applicable to the management of cultural heritage values within the off-site road works areas:

- Prior to European occupation, the broader regions in which the off-site road works areas are located would have been (and continues to be) an important place for Aboriginal peoples and a key transit route for travel.
- Raw materials used for flaked stone artefact manufacture in the areas surrounding the off-site road works areas, where present, were likely imported from neighbouring communities and is tangible evidence of a prosperous trade network within the region.
- The location of lithic objects identified during the Project ACHA fieldwork program indicates that the sandy dune ridge environs were favoured camping locations for Aboriginal peoples and as such, held (and continues to hold) specific cultural value.

- Hearths (remnant and/or intact) and hearth retainers (clay, stone etc) are tangible sites that hold particular cultural value to Aboriginal peoples as an in situ, visible indicator for ancestral activities. RAP field representatives indicated that where possible, hearths should be avoided and protected.
- Daily domestic activities associated with Aboriginal lifeways, including foraging, travel etc., were told through Dreaming stories and Lore, and included seasonal knowledge and observations of constellations, and the interconnectedness of animal migrations/mating seasons and plant growth/flowering/seeding cycles.

5.2 Scientific (Archaeological) Significance

The scientific (or archaeological) significance of Aboriginal sites relates to their potential for providing information about past Aboriginal culture/s and is commonly assessed on the basis of *research potential*, *representativeness* and *rarity*. Other criteria, such as aesthetic value and education potential, may also be relevant.

5.2.1 Research Potential

Research potential is defined as the potential of any archaeological site to address specific and defined research questions. Such questions may relate to aspects of human behaviours, occupation patterns and activities and/or environments. Several criteria can be used to assess the research potential of an archaeological site. Particularly pertinent in Aboriginal cultural heritage management is the state of preservation (i.e., integrity) of any site, the complexity of elements within it and its potential for archaeological deposit (NPWS, 1997, p.7).

Integrity refers to the state of preservation of an archaeological site, and/or the extent to which it has been impacted by natural and/or anthropogenic phenomena. The principle of archaeological integrity is founded on the concept that a more intact archaeological site will be able to provide more useful environmental land /or archaeological data, and consequently (albeit subjectively) will retain higher 'value'.

The **complexity** of an archaeological site refers to the nature of elements within it (e.g., the physical size of the site, spatial patterning in observed cultural materials). In the case of open artefact sites, for example, the principal criteria used to assess complexity are the site's size (i.e., number of artefacts and/or spatial extent), the presence, range and frequency of artefact and raw material types, and the presence of features such as hearths.

Potential for archaeological deposit refers to the potential of an archaeological site (or area of PAD) to contain subsurface archaeological evidence which, through systematic archaeological excavation, may assist in answering defined research questions.

Connectedness refers to the relationship between archaeological sites within its surrounding context and may be interpreted through site location, type and contents.

5.2.2 Rarity and Representativeness

Rarity refers to the relative scarcity of an archaeological site, both locally and regionally. The scientific significance of an archaeological site is assessed as being higher if it is unique or rare and conversely, may be considered to be lower in significance if it is common in one or both. The concept of representativeness, meanwhile, refers to the question of whether or not a site is *"a good example of its type, illustrating clearly the attributes of its significance"* (Burke & Smith, 2004).

5.3 Assessment of Archaeological Significance

As no new or previously identified Aboriginal objects or sites are recorded within the off-site road works areas, assessment of the archaeological significance of the off-site road works areas cannot be undertaken. The significance of Aboriginal cultural values within the broader cultural landscape must be acknowledged.

The off-site road works areas and surrounding environs, prior to European colonisation, would have been intensively occupied by Aboriginal groups, attracted by abundant material and cultural resources, and likely necessitating complex inter-group practices.

The off-site road works areas and surrounds similarly was pivotal in the early interactions and engagement between local Aboriginal groups and European colonisers extending through to the 20th century.

While no Aboriginal sites or objects have been recorded within the off-site road works areas, the broader Riverina Bioregion maintains cultural significance to Aboriginal communities.

6.0 Impact Assessment

6.1 Summary of Proposed Impacts

As discussed in **Section 1.3.1**, areas have been identified along the Port to Hay Transport Routes where road modifications would be required to enable the safe transport of Project components using OSOM vehicles. In some instances, these road modifications result in disturbance outside of the existing road pavement, which has warranted further assessment of potential impacts to Aboriginal cultural heritage values.

This updated Addendum ACHA is focused on potential impacts associated with the off-site road works areas only, and an assessment of potential impacts to Aboriginal cultural heritage values associated with the construction and operation of the Project is contained within the Revised ACHA (Umwelt, 2025).

Activities associated with the construction of the off-site road works with potential to impact Aboriginal cultural heritage values as described in **Table 6.1** below.

Table 6.1 Activities with potential for impacts

Activity Type	Impact description
Off-site road works, involving modifications to select portions of the Port to Hay Transport Route to accommodate oversize overmass (OSOM) vehicles delivering Project-related materials to the Project site.	Earthworks associated with road modifications including construction of hardstands and other works to make sections of the road 'trafficable'. No Aboriginal sites have been identified within proposed disturbance areas associated with off-site road works.

6.2 Impacts to Potential Archaeological Resource

This assessment has determined that it is unlikely that surface and/or subsurface Aboriginal objects will be directly impacted by the construction of the off-site road work areas.

6.3 Avoiding and Minimising Harm

6.3.1 Proposed Harm Minimisation of Aboriginal Sites

The current assessment determined that the Project would not cause direct harm to Aboriginal objects and/or the potential resource across the off-site road works areas.

6.4 Cumulative Impact Assessment

6.4.1 Ecologically Sustainable Development

Australia's National Strategy for Ecologically Sustainable Development (1992) defines ecologically sustainable development as: 'using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained, and the total quality of life, now and in the future, can be increased'. Simply, Ecologically Sustainable Development is development which aims to meet the needs of Australians today, while conserving our ecosystems for the benefit of future generations.

6.4.2 Intergenerational Equity – Cumulative Impact Assessment

When assessing likely harm on Aboriginal objects and places it is necessary to consider the principle of intergenerational equity. Intergenerational equity is:

“...the principle whereby the present generation should ensure the health, diversity and productivity of the environment for the benefit of future generations”.

In terms of Aboriginal cultural heritage, intergenerational equity can be considered in terms of the cumulative impacts to Aboriginal objects and places in a region. If few Aboriginal objects and places remain in a region (for example, because of impacts by historic development or under previous AHIPs/ACHMPs etc), fewer opportunities remain for future generations of Aboriginal people to benefit from the preservation of their cultural heritage, places and objects. Information about the integrity, rarity or representativeness of the Aboriginal objects and places that may be impacted by a project, and how those tangible cultural heritage elements demonstrate the lifeways of Aboriginal peoples within the region, is pertinent to the consideration of intergenerational equity and the understanding of a project's contribution to cumulative impacts. Where there is uncertainty, the precautionary principle must be followed (DECC [former] 2009: 26).

No new or previously recorded Aboriginal objects and/or sites were identified in the Project Area. As identified in **Section 6.0**, the Project has low potential to impact Aboriginal objects or sites, and low potential to impact the Aboriginal cultural heritage values of the Project Area and its environs. As such, there are no potential cumulative impacts to intergenerational equity with regards to Aboriginal cultural heritage.

7.0 Management Strategy

7.1 Overview

This updated Addendum ACHA forms part of the Amendment Report prepared by Umwelt to accompany BWF's application for SSD Consent under Division 4.1 of Part 4 of the EP&A Act. The Code of Practice (DECCW, 2010b) provides best practice documents for Aboriginal Cultural Heritage Impact Assessments in NSW. Both documents have been considered in the formulation of the management strategy detailed in the following sections.

A management strategy to address the potential impacts of the Project on the potential Aboriginal heritage resource of the off-site road works areas is provided in the following subsections. It is recommended that this strategy be detailed in the Aboriginal Cultural Heritage Management Plan (ACHMP) that was recommended for the Project (Umwelt, 2025). There are no changes to these management recommendations as a result of the H-NSW advice and updates made to this Addendum ACHA.

7.2 Previously Unrecorded Aboriginal sites and/or Objects

Provisions regarding the appropriate management action(s) for any previously unrecorded Aboriginal sites and/or objects identified within the off-site road works areas throughout the life of the Project must be incorporated into the ACHMP (i.e. an Unexpected Finds Protocol), in line with the broader Project. Management action(s) will vary according to the type of evidence identified, its significance (both scientific and cultural) and the nature of potential impacts.

7.3 Previously Unrecorded Aboriginal Objects

Provisions regarding the appropriate management action(s) for any previously unrecorded Aboriginal archaeological sites/materials identified within the off-site road works areas throughout the life of the Project (including construction, operations and decommissioning phases) must be incorporated into the ACHMP (i.e. an Unexpected Finds Protocol). Management action(s) will vary according to the type of evidence identified, its significance and the nature of potential impacts but in general will comprise the following procedure:

- All works would cease immediately in the area to prevent any further impacts to the object(s).
- Notify the BWF Environmental Manager and/or Project Manager immediately.
- A qualified heritage consultant would be engaged to determine the nature, extent and scientific significance of the object(s). RAPs are to be notified in writing regarding the nature of the find and if required, proposed management actions. RAPs will be requested to provide comments within seven (7) days.
- An AHIMS site card would be completed and submitted to Heritage NSW in compliance with Section 89A of the NPW Act. The site cards will be lodged within 21 days and a copy provided to those RAPs who wish to have a copy.

- The ACHMP and any other Project environmental management systems or databases would be updated (as relevant) to address the new Aboriginal site.

7.4 Human Skeletal Remains

In the event that potential human skeletal remains are identified throughout the life of the Project (including construction, operations and decommissioning phases), the following standard procedure outlined below will be followed (this procedure will also be included in the ACHMP for the Project):

1. All work in the vicinity of the remains must cease immediately.
2. The location must be cordoned off and the appropriate authorities notified (including NSW Police and if considered of possible Aboriginal descent, NSW Heritage).
3. Subject to any alternative instruction from the NSW Policy or Heritage NSW, a physical or forensic anthropologist would be commissioned to inspect the remains *in situ* and make a determination of ancestry (Aboriginal or non-Aboriginal) and antiquity (pre-contact, historic or modern).

Subsequent management actions will be dependent on the findings of the inspection undertaken under Point 3.

- a. If the remains are identified as modern and human, the area will become a crime scene under the jurisdiction of the NSW Police.
- b. If the remains are identified as pre-contact or historic Aboriginal, the site will be secured, and Heritage NSW and all RAPs notified in writing.
- c. If the remains are identified as historic (non-Aboriginal), the site is to be secured and the Heritage NSW contacted.
- d. If the remains are identified as non-human, work can recommence immediately.

7.5 Aboriginal Cultural Heritage Awareness Training

An Aboriginal cultural heritage awareness training package will be developed for use throughout the life of the Project. This package will be developed and completed prior to the commencement of any ground disturbance works, and will apply to these off-site road works areas. Aboriginal cultural awareness training will be mandatory for all staff and contractors whose roles may require interaction with Aboriginal sites and/or involve consultation with Aboriginal stakeholders.

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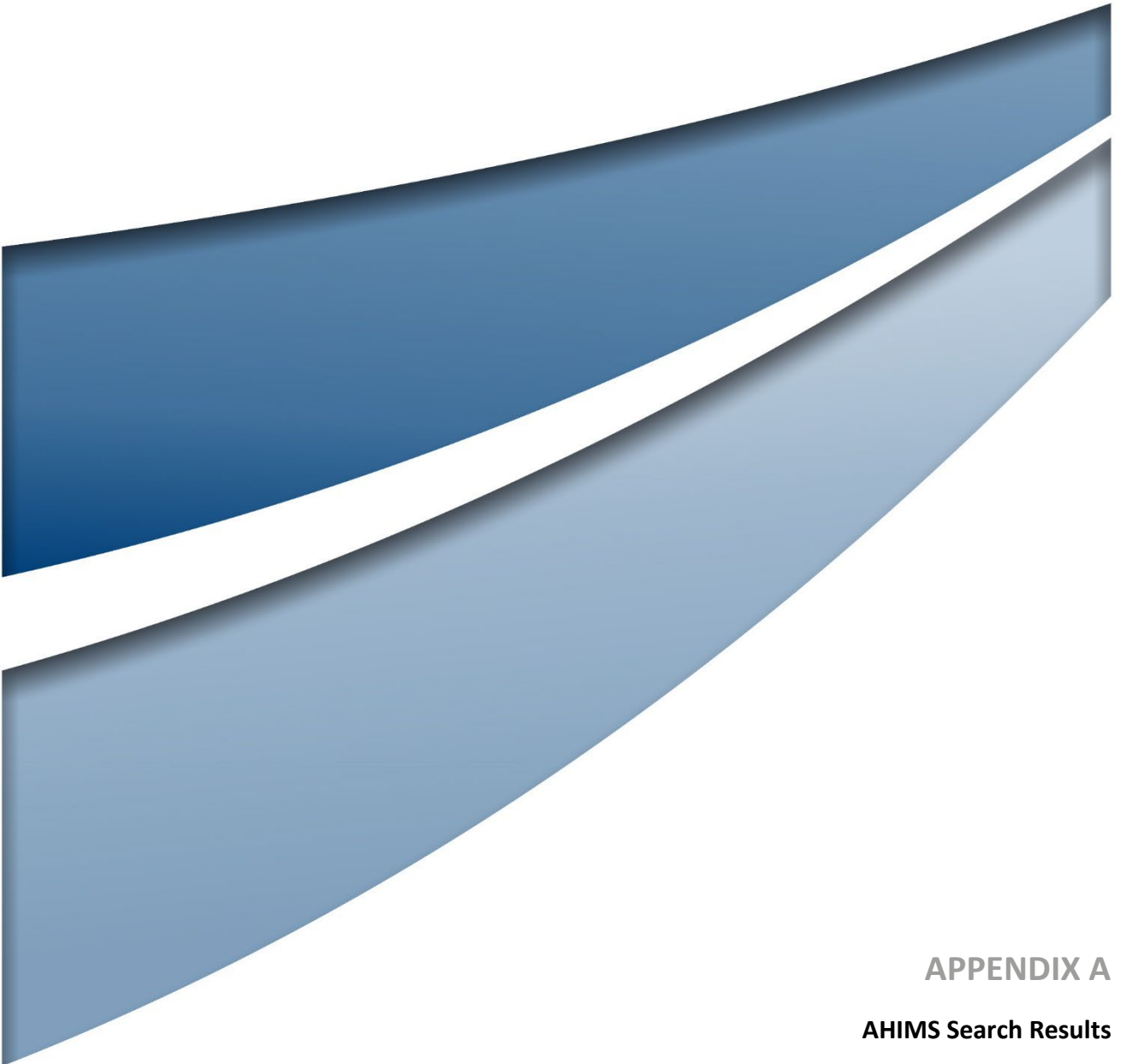
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APPENDIX A

AHIMS Search Results

Umwelt (Australia) Pty Limited - Individual users

Date: 26 February 2025

75 York Street

Teralba New South Wales 2284

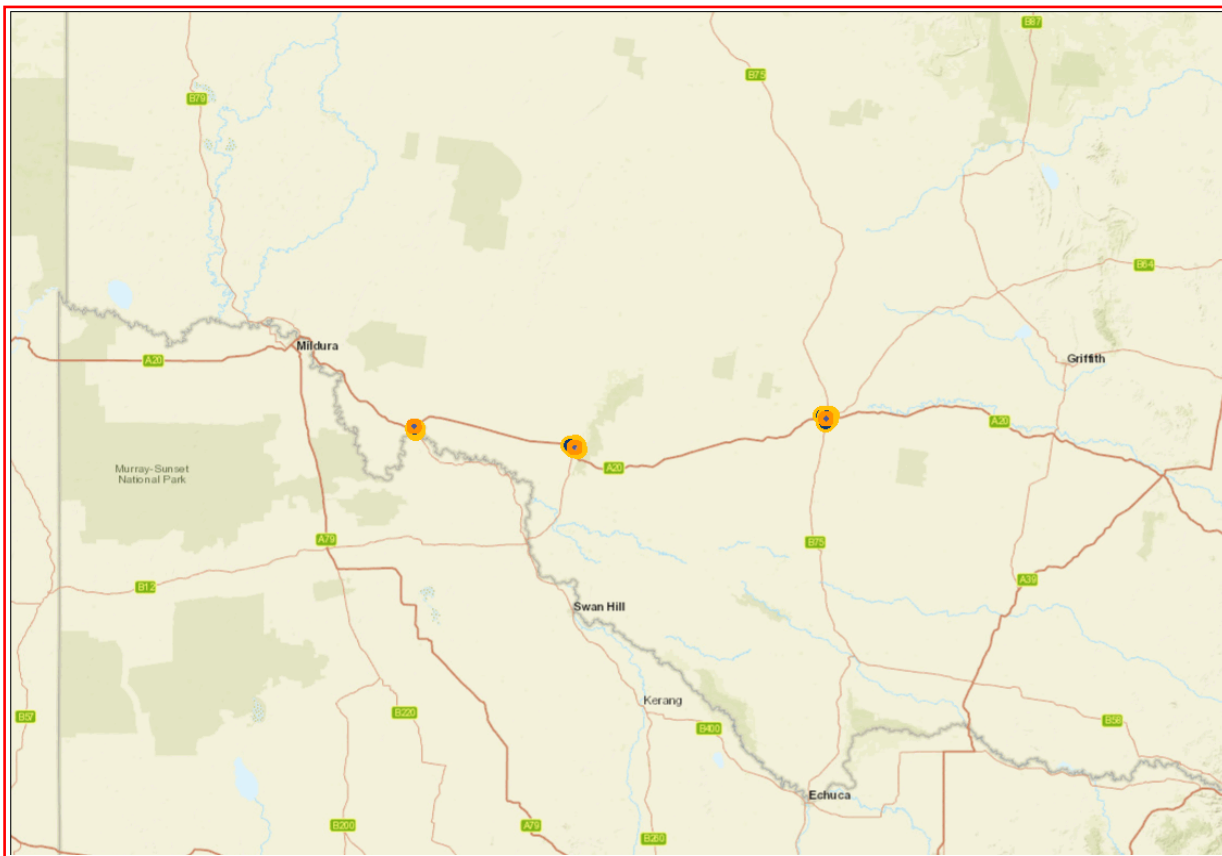
Attention: Luke Wolfe

Email: lwolfe@umwelt.com.au

Dear Sir or Madam:

AHIMS Web Service search for the following area at Search using shape-file Search Area 5km with a buffer of 0 meters. Additional Info : Archaeological Assessment, conducted by Luke Wolfe on 26 February 2025.

The context area of your search is shown in the map below. Please note that the map does not accurately display the exact boundaries of the search as defined in the paragraph above. The map is to be used for general reference purposes only.



A search of Heritage NSW AHIMS Web Services (Aboriginal Heritage Information Management System) has shown that:

48	Aboriginal sites are recorded in or near the above location.
2	Aboriginal places have been declared in or near the above location. *

ID	Aboriginal Place Name
5	Dippo Ceremonial Ground
139	The Island (Poonyea)

If your search shows Aboriginal sites or places what should you do?

- You must do an extensive search if AHIMS has shown that there are Aboriginal sites or places recorded in the search area.
- If you are checking AHIMS as a part of your due diligence, refer to the next steps of the Due Diligence Code of practice.
- You can get further information about Aboriginal places by looking at the gazettal notice that declared it. Aboriginal places gazetted after 2001 are available on the [NSW Government Gazette \(https://www.legislation.nsw.gov.au/gazette\)](https://www.legislation.nsw.gov.au/gazette) website. Gazettal notices published prior to 2001 can be obtained from Heritage NSW upon request

Important information about your AHIMS search

- The information derived from the AHIMS search is only to be used for the purpose for which it was requested. It is not be made available to the public.
- AHIMS records information about Aboriginal sites that have been provided to Heritage NSW and Aboriginal places that have been declared by the Minister;
- Information recorded on AHIMS may vary in its accuracy and may not be up to date. Location details are recorded as grid references and it is important to note that there may be errors or omissions in these recordings,
- Some parts of New South Wales have not been investigated in detail and there may be fewer records of Aboriginal sites in those areas. These areas may contain Aboriginal sites which are not recorded on AHIMS.
- Aboriginal objects are protected under the National Parks and Wildlife Act 1974 even if they are not recorded as a site on AHIMS.
- This search can form part of your due diligence and remains valid for 12 months.

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
48-5-0033	GSE 3	AGD	55	301420	6176500	Open site	Valid	Modified Tree (Carved or Scarred) : -	Scarred Tree	
	<u>Contact</u>									
48-5-0034	GSE 1& 2	AGD	55	301400	6175540	Open site	Valid	Modified Tree (Carved or Scarred) : -	Scarred Tree	
	<u>Contact</u>									
47-6-0015	Police Paddock Scarred Tree;	AGD	54	735400	6163300	Open site	Valid	Modified Tree (Carved or Scarred) : -	Scarred Tree	1216
	<u>Contact</u>									
47-6-0016	Muhti Muhti Reserve Midden;	AGD	54	733000	6164000	Open site	Valid	Earth Mound : -, Shell : -, Artefact : -	Midden	1216
	<u>Contact</u>									
48-5-0003	Hay	AGD	55	301260	6178734	Open site	Valid	Artefact : -, Burial : -	Burial/s,Open Camp Site	1160,1216
	<u>Contact</u>									
48-5-0018	North Bank Murrumbidgee;	AGD	55	299886	6178995	Open site	Valid	Earth Mound : -, Shell : -, Artefact : -	Midden	1160
	<u>Contact</u>									
48-5-0296	10 Mile TSR 3	GDA	55	302753	6176912	Open site	Valid	Artefact : -		
	<u>Contact</u>									
47-6-0002	Balranald Mission Cemetery and Island	AGD	54	735223	6162576	Open site	Valid	Aboriginal Ceremony and Dreaming : -, Burial : -		
	<u>Contact</u>									
47-6-0046	balranald levee 1	AGD	54	735812	6164400	Open site	Valid	Modified Tree (Carved or Scarred) : -		98524
	<u>Contact</u>									
47-6-0044	balranald levee 5	AGD	54	735830	6164022	Open site	Valid	Modified Tree (Carved or Scarred) : -		98524
	<u>Contact</u>									
47-6-0045	balranald levee 2	AGD	54	735860	6164355	Open site	Valid	Modified Tree (Carved or Scarred) : -		98524
	<u>Contact</u>									
47-6-0047	balranald levee 6	AGD	54	734800	6163492	Open site	Valid	Shell : -		98524
	<u>Contact</u>									

<u>SiteID</u>	<u>SiteName</u>	<u>Datum</u>	<u>Zone</u>	<u>Easting</u>	<u>Northing</u>	<u>Context</u>	<u>Site Status **</u>	<u>SiteFeatures</u>	<u>SiteTypes</u>	<u>Reports</u>
47-4-0017	Robinvale- Euston Bridge PAD	AGD	54	661948	6172255	Open site	Valid	Potential Archaeological Deposit (PAD) : 1		98838
	<u>Contact</u>	<u>Recorders</u>	Ms.Vanessa Edmonds					<u>Permits</u>	1749	
47-6-0048	balranald levee 3	AGD	54	735891	6164312	Open site	Valid	Modified Tree (Carved or Scarred) : -		98524
	<u>Contact</u>	<u>Recorders</u>	Ms.Vanessa Edmonds					<u>Permits</u>		
47-6-0049	balranald levee 4	AGD	54	735890	6164138	Open site	Valid	Modified Tree (Carved or Scarred) : -		98524
	<u>Contact</u>	<u>Recorders</u>	Ms.Vanessa Edmonds					<u>Permits</u>		
47-6-0050	balranald levee 8	AGD	54	735987	6163862	Open site	Valid	Modified Tree (Carved or Scarred) : -		98524
	<u>Contact</u>	<u>Recorders</u>	Ms.Vanessa Edmonds					<u>Permits</u>		
47-6-0051	balranald levee 7	AGD	54	734150	6163750	Open site	Valid	Shell : -		98524
	<u>Contact</u>	<u>Recorders</u>	Ms.Vanessa Edmonds					<u>Permits</u>		
47-6-0052	police paddocks 3	AGD	54	735498	6163544	Open site	Valid	Modified Tree (Carved or Scarred) : 1		98524
	<u>Contact</u>	<u>Recorders</u>	Ms.Vanessa Edmonds					<u>Permits</u>		
47-6-0053	police paddocks 2	AGD	54	735512	6163637	Open site	Valid	Modified Tree (Carved or Scarred) : -		98524
	<u>Contact</u>	<u>Recorders</u>	Ms.Vanessa Edmonds					<u>Permits</u>		
47-6-0058	Yanga creek mound 1	AGD	54	735195	6163476	Open site	Valid	Earth Mound : -		
	<u>Contact</u> Searle	<u>Recorders</u>	Mr.Mark Brettschneider					<u>Permits</u>		
47-6-0326	LALC Scar Tree	GDA	54	736646	6162361	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u> Searle	<u>Recorders</u>	Mr.Lawrence Clarke					<u>Permits</u>		
47-6-0327	Island Scar Tree	GDA	54	736646	6162361	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u> Searle	<u>Recorders</u>	Mr.Lawrence Clarke					<u>Permits</u>		
48-5-0070	Sandy Point 1	GDA	55	301846	6178556	Open site	Valid	Modified Tree (Carved or Scarred) : -, Aboriginal Resource and Gathering : -, Artefact :-		

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
	<u>Contact</u>	<u>Recorders</u>	Doctor.Sarah Martin,Mr.Peter Ingram					<u>Permits</u>		
48-5-0124	Hay State Forest 100	GDA	55	302631	6178627	Open site	Valid	Conflict : -, Habitation Structure : -, Shell : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Rene Woods					<u>Permits</u>		
48-5-0125	Hay state forest 102	GDA	55	302462	6178802	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Rene Woods					<u>Permits</u>		
47-4-0323	Euston Floodplain 2	GDA	54	662030	6173647	Open site	Valid	Artefact : 1, Hearth : 1		
	<u>Contact</u>	<u>Recorders</u>	Mr.Jeffrey Hill,Jacobs Group (Australia) Pty Ltd - Melbourne					<u>Permits</u>		
47-4-0324	Euston Floodplain 1	GDA	54	661679	6173995	Open site	Valid	Artefact : 1		
	<u>Contact</u>	<u>Recorders</u>	Mr.Jeffrey Hill,Jacobs Group (Australia) Pty Ltd - Melbourne					<u>Permits</u>		
47-6-0608	Balranald Common Canoe Tree 1	GDA	54	735996	6163016	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Ray Mitchell					<u>Permits</u>		
48-5-0128	Hay State Forest 101	GDA	55	302595	6178685	Open site	Valid	Shell : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Rene Woods					<u>Permits</u>		
48-5-0129	Hay State Forest 103	GDA	55	302796	6179164	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Rene Woods					<u>Permits</u>		
48-5-0130	Hay State Forest 104	GDA	55	302891	6179202	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Rene Woods					<u>Permits</u>		
48-5-0131	Hay State Forest 105	GDA	55	303122	6179177	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Rene Woods					<u>Permits</u>		
48-5-0132	Hay State Forest 106	GDA	55	302811	6179097	Open site	Valid	Earth Mound : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Rene Woods					<u>Permits</u>		
48-5-0133	Hay State Forest 110	GDA	55	302605	6178806	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Rene Woods					<u>Permits</u>		
48-5-0134	Hay State Forest 111	GDA	55	302642	6178836	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Rene Woods					<u>Permits</u>		

<u>SiteID</u>	<u>SiteName</u>	<u>Datum</u>	<u>Zone</u>	<u>Easting</u>	<u>Northing</u>	<u>Context</u>	<u>Site Status **</u>	<u>SiteFeatures</u>	<u>SiteTypes</u>	<u>Reports</u>
48-5-0191	Hay Bridge Canoe tree 1	GDA	55	301864	6178536	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Mark Saddler					<u>Permits</u>		
48-5-0192	Hay Bridge Ring tree 1	GDA	55	301847	6178556	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Mark Saddler					<u>Permits</u>		
48-5-0205	Bushy Bend-Sandy Point 5	GDA	55	302046	6178724	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Peter Ingram					<u>Permits</u>		
48-5-0206	Bushy Bend-Sandy Point 6	GDA	55	302772	6178742	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Peter Ingram					<u>Permits</u>		
48-5-0208	Sandy Point 3.	GDA	55	301857	6178532	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Peter Ingram					<u>Permits</u>		
48-5-0209	Sandy Point 4	GDA	55	301339	6178565	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Peter Ingram					<u>Permits</u>		
48-5-0210	Bushy Bend/Sandy Point 4.	GDA	55	302344	6178425	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Peter Ingram					<u>Permits</u>		
48-5-0211	Bushy Bend/Sandy Point 3.	GDA	55	302378	6178449	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Peter Ingram					<u>Permits</u>		
48-5-0212	Bushy Bend-Sandy Point 2	GDA	55	302351	6178453	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Peter Ingram					<u>Permits</u>		
47-6-0930	Gumbalaya Sleeping Lady: HB1180	GDA	54	736403	6163702	Open site	Valid	Burial : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Sam Kirby,Mr.Daryl Pappin					<u>Permits</u>		
47-6-0943	BD-ST-001	GDA	54	734708	6162460	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Kayandel Archaeological Services,Ms.Natalie Stiles					<u>Permits</u>		

<u>SiteID</u>	<u>SiteName</u>	<u>Datum</u>	<u>Zone</u>	<u>Easting</u>	<u>Northing</u>	<u>Context</u>	<u>Site Status **</u>	<u>SiteFeatures</u>	<u>SiteTypes</u>	<u>Reports</u>
47-6-0944	E2291 Male - Balranald Repatriation Burial	GDA	54	736407	6163705	Open site	Valid	Burial : -		
	<u>Contact</u>	<u>Recorders</u>	Department of Premier & Cabinet - Heritage (Albury) ,Mr.Sam Kirby						<u>Permits</u>	
48-5-0694	Hay State Forest 102	GDA	55	302462	6178802	Open site	Valid	Shell : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Rene Woods						<u>Permits</u>	

** Site Status

Valid - The site has been recorded and accepted onto the system as valid

Destroyed - The site has been completely impacted or harmed usually as consequence of permit activity but sometimes also after natural events. There is nothing left of the site on the ground but proponents should proceed with caution.

Partially Destroyed - The site has been only partially impacted or harmed usually as consequence of permit activity but sometimes also after natural events. There might be parts or sections of the original site still present on the ground

Not a site - The site has been originally entered and accepted onto AHIMS as a valid site but after further investigations it was decided it is NOT an aboriginal site. Impact of this type of site does not require permit but Heritage NSW should be notified

