



HERITAGE MANAGEMENT PLAN

Woodlawn Zinc Copper Project

Document Review/Change History

Date	Summary of review and changes	Revision No.	Authors	
			Reviewed by	Approved by
30/05/2016	Internal review	1	HS	RB
10/06/2016	Agency and NGO review	2	RB	HS
13/09/2016	Issued to Department of Planning and Environment	3	RB	HS
10/05/2017	Revised issue to DPE	4	RB	AL
11/05/2017	Operational	5	RB	AL
31/07/2017	Amendments for MOD2	6	RB	AL
19/12/2022	Reviewed	7	ZR	ZR
16/05/2024	Amend company details, refine plan, updates following revised company strategy	8	KC	AVN
16/12/2024	Updated plan for re-submission to major projects portal	9	CH	KC
08/01/2025	Consultation log updated following receipt of letter from Heritage NSW	10	KC	KC
26/08/2025	Plan updated in response to DPHI RFI (MP07_0143-PA-22) and re-submitted to the major projects portal	11	KC	KC

Glossary

Acronym	Definition
AR	Annual Review
BNAC	Buru Ngunnawal Aboriginal Corporation
CCC	Community Consultation Committee
DEVELOP	Develop Global Limited - Tarago Operations Pty Limited
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DPE	Department of Planning and Environment
DPHI	Department of Planning, Housing and Infrastructure (formerly DPE)
EA	Environmental Assessment
EMS	Environmental Management Strategy
EPA	Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EPL	Environmental Protection Licence
GTCAC	Gundungurra Tribal Aboriginal Corporation
HMP	Heritage Management Plan
Infigen	Woodlawn Windfarm (Now Iberdrola)
NC97/7	Native Title claim
NNTT	National Native Title Tribunal
NT Act	Native Title Act 1993
OEH	NSW Environment and Heritage (now DPHI)
PLALC	Pejar Local Aboriginal Land Council
Project	Woodlawn Zinc-Copper mine
Project Approval	Project Approval 07_0143 MOD2
SML20	Special Mining Lease 20
Veolia	Woodlawn Bioreactor

Contents

1. Introduction	4
1.1. Background	4
1.2. Scope and Objectives	4
1.3. Consultation	5
1.4. Legislative Requirements	5
1.5. Project Approval Requirements	6
2. Heritage Context and Significance	8
2.1. Historical Context	8
3. Management of Heritage Values	9
3.1. Management of existing identified areas	9
3.2. Management of unidentified Aboriginal and non-Aboriginal heritage objects	9
3.3. Discovery of skeletal remains	10
4. Communication	11
4.1. Engagement Protocol	11
4.2. Public Access to Information	11
5. Communication, Reporting and Reviews	12
5.1. Internal Training and Awareness	12
5.2. Reporting	12
5.3. Complaints	12
5.4. Incident reporting	12
5.5. Review and continuous improvement	13

Appendices

Appendix 1	Plans
Appendix 2	Consultation log - HMP
Appendix 3	Plan Approval

1. INTRODUCTION

1.1. Background

The Woodlawn Zinc-Copper mine (the Project) is located approximately 7 km northwest of Tarago in New South Wales (NSW) within Special (Crown and Private Land) Mining Lease no. 20 (SML20) as shown in Appendix 1, Plan 1. The Heritage aspect for the Project is described in detail in Section 13 of the Project Environmental Assessment (EA) (Parsons Brinkerhoff 2012).

As part of the EA, a detailed assessment of Aboriginal and non-Aboriginal heritage was undertaken for the Project and neighbouring area by Artefact Heritage Services (June 2011). The heritage assessment concluded that no Aboriginal sites, Aboriginal Places, or areas of archaeological potential were located within the study area. Similarly, there were no non-Aboriginal heritage found or would likely occur that would be impacted by the Project. Similarly, there are no known iron oxide or ochre deposits. The general rock types were also determined to not be conducive to the manufacture of stone tools, and axes.

Although there has been no identified archaeological sites or items of heritage significance located to date within the area to be disturbed by the Project, Develop Global Limited - Tarago Operations Pty Limited (DEVELOP) understands the importance of heritage issues and given the rich historical context described in Section 2, it is well understood that the level of existing site disturbance caused by past mining and agricultural activities is no excuse for not being diligent in identifying and managing cultural values.

1.2. Scope and objectives

This Heritage Management Plan (HMP) has been prepared in response to Schedule 4 Condition 27 of the Project Approval 07_0143 MOD2 (Project Approval). The purpose of this HMP is to ensure that any unknown items or matters of cultural heritage are protected throughout the operation of the Woodlawn Project. The primary mining activity that has the potential to impact upon Aboriginal cultural heritage is land disturbance.

The potential impacts on Aboriginal heritage due to land disturbance include:

- Disturbance of identified Aboriginal objects
- Disturbance of unidentified Aboriginal objects

The overall objectives of the HMP are to:

- Comply with the requirements of both NSW State and Federal environmental legislation with respect to the protection of heritage sites of significance and Aboriginal artefacts.
- Protect both identified and unidentified Aboriginal heritage from damage or harm within SML20.
- Provide a mechanism to identify and manage any additional heritage items in future.
- Ensure that in the event that Aboriginal heritage cannot be protected that appropriate management, such as salvage and storage of Aboriginal heritage material occurs
- Ensure that effective and open consultation with relevant stakeholders occurs through continuation of the Community Consultation Committee (CCC)
- Ensure the local community and regulators informed of activities where required and respond quickly and effectively to issues or complaints

- Provide an effective monitoring, auditing and reporting framework to assess the effectiveness of the controls implemented.

It is noted that construction activities on the surface of the site have been completed in accordance with the Project Approval. Therefore, this updated management plan considers the operational phase of the Project only.

1.3. Consultation

This Plan has been developed in consultation with a range of stakeholders including government, traditional owners and non-government organisations. The HMP was initially approved by DPE in 2017 (Appendix 3) which was prior to construction commencing on-site.

The registered Aboriginal stakeholders relevant to the Woodlawn Project include:

- Buru Ngunnawal Aboriginal Corporation (BNAC).
- Gundungurra Tribal Aboriginal Corporation (GTCAC). GTCAC had a registered native title claim (NC 97/7) that covered a portion of SML20. The claim has been discontinued.
- The Pejar Local Aboriginal Land Council (PLALC) has a statutory obligation to manage Aboriginal cultural heritage within the Land Council boundary, which includes SML20.

All three groups were consulted as part of the original archaeological investigations for the Project in June 2016. They were invited to attend the key stakeholder focus groups and were separately informed that the Project will be proceeding. A copy of the original management plan was provided to the previous contact list for each of these three groups as well as OEH (now DPHI) on 10 June 2016. Comments were only received from the PLALC. Details of the response can be seen in the Consultation Log (Appendix 2). The consultation log will be updated as required, during the life of the Project.

Further consultation with these groups will occur should the Woodlawn Project propose to disturb any areas within the mining lease that are:

- Outside the existing project footprint
- Outside areas that have been approved for disturbance, or
- In areas that have not been subject to previous archaeological surveys and investigations.

1.4. Legislative requirements

The Project is governed by the following:

- Project Approval: as issued in 2013, and amended in 2016 and 2017 (07_0143MOD2)
- Environment Protection License (EPL): 20821 as issued by the NSW Environmental Protection Agency (EPA)
- Special Mining Lease (SML): 20

Other legislation and documents relevant to this Plan include:

- *Native Title Act 1993* (NT Act)
- *National Parks and Wildlife Act 1974*
- *The Heritage Act 1977*
- *The State Heritage Register*
- Section 170 Register (the Heritage and Conservation Register)
- Goulburn Mulwaree Local Environment Plan [LEP] (2009)
- Goulburn Mulwaree Heritage Strategy 2022-2025.

1.5. Project approval requirements

This HMP has been developed in accordance with the Project requirements as set out in the Project Approval and Statement of Commitments (SOC). Table 1-1 outlines these including reference to where conditions are addressed.

Table 1-1 **Conditions of approval**

Condition ID	Condition description	Where addressed
Schedule 4, Condition 27	The Proponent shall prepare and implement a Heritage Management Plan for the Project to the satisfaction of the Director-General. The Plan must:	This Plan
	a) be prepared in consultation with NSW Environment and Heritage (OEH) and the Aboriginal stakeholders (in relation to the management of Aboriginal heritage values);	Section 1.3
	b) be submitted to the Director-General for approval prior to commencing construction on site;	Section 1.3
	c) include consideration of the Aboriginal and non-Aboriginal cultural context and significance of the site, and	Section 2
	d) include programs/procedures and management measures for appropriate identification, management, conservation and protection of both Aboriginal and non-Aboriginal heritage items identified on the site.	Section 3
Schedule 6, Condition 5	Revision of Strategies, Plans and Programs Within three months of: (a) the submission of an annual review under Condition 4 above; (b) the submission of an incident report under Condition 7 below; (c) the submission of an audit under Condition 9 below; or (d) any modification to the conditions of this approval (unless the conditions require otherwise), the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary. Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any	Section 5.5

Condition ID	Condition description	Where addressed
	recommended measures to improve the environmental performance of the project. #	
Schedule 6, Condition 8	The Proponent shall provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any approved plans of the conditions of this approval.	Section 5.2
Statement of Commitment item 10A	In the event that Aboriginal or non-Aboriginal heritage items are encountered, work would cease immediately in the vicinity of the find to allow a qualified archaeologist to make an assessment of the finds. The archaeologist would consult with the OEH and registered Aboriginal stakeholders concerning the significance of any Aboriginal or historic cultural material identified.	Section 3.2

#

2. HERITAGE CONTEXT AND SIGNIFICANCE

2.1. Historical context

The traditional owners of the land in the Tarago area are the Ngunnawal people. The Ngunnawal land is described by Tindale (1974) as extending from Queanbeyan to Yass, Tumut to Boorowa, and east to beyond Goulburn on highlands west of the Shoalhaven River.

The Aboriginal tribes who lived in this region are thought to have been more nomadic than their coastal counterparts (Flood 1980), probably because the food supply was less abundant. There has been at least 21,000 years of Aboriginal occupation in and around the Lake George area (Flood 1996) but with less frequent and transient use of areas within SML20. The traditional Ngunnawal lands cross several ecological zones, and a nomadic lifestyle would have allowed for the most efficient use of the resources of the land. This would have allowed Aboriginal groups to make seasonal adaptations that utilised most of the available resources (Biosis Research 2005).

Although Lake George was a more heavily populated area due to the higher resources, there may have been a tendency for people to pass through the SML20 area, using ridge lines as vantage points and in response to seasonal resource availability. The Ngunnawal people and Ngunnawal/Gundungurra-speaking groups are both indicated as being present within the area at the time of the arrival of Europeans.

Lake George and Lake Bathurst were discovered in 1818 and were quickly settled. The towns of Lake Bathurst and Tarago were established in 1827 and the area was progressively cleared and used for crops and sheep grazing. The railway was completed in 1884 which saw the increase in agricultural development.

The Woodlawn Project lies on land that was granted freehold in the 1830's, though cleared for agriculture 10 years earlier. Although the title holding extinguishes native title, the Gundungurra Tribal Aboriginal Corporation has a registered Native Title Claim (NC97/7) over the land. The claim was registered with the National Native Title Tribunal (NNTT) on 29 April 1997 and covers a large area from Lithgow in the north, Moss Vale to the east and Goulburn to the south, but extends into SML20 and the Lake George area.

3. MANAGEMENT OF HERITAGE VALUES

3.1. Management of existing identified areas

The principal management initiative will be the identification of areas that have potential to contain archaeological material and to ensure that appropriate steps are made prior to any land disturbance to ensure that heritage items are preserved or managed appropriately in accordance with the provisions of the National Parks and Wildlife Act 1974 (NPW Act) and Heritage Act 1977.

Iberdrola Australia (formerly Infigen Energy) own and maintain the Woodlawn Wind Farm within the vicinity of the Woodlawn Project. Several heritage sites were recorded whilst they were conducting heritage surveys associated with the wind farm development. These sites sit outside the Project area and occur within land where access is controlled by Iberdrola. DEVELOP cannot enter or interfere with these areas unless prior liaison has occurred with Iberdrola.

As summarised in Section 1.1 there are no identified archaeological sites or items of heritage significance located to date within the area to be disturbed by the Project.

3.2. Management of unidentified Aboriginal and non-Aboriginal heritage objects

This section provides procedures that will be followed if unidentified Aboriginal or non-Aboriginal heritage objects are discovered at any time throughout the life of the Project. Aboriginal objects are protected from harm by Section 86 of the *National Parks and Wildlife Act 1974* (NPW Act). Harm refers to any act or omission that:

- Destroys, defaces or damages the object;
- Moves the object from the land on which it is situated.

If unanticipated Aboriginal and non-Aboriginal heritage objects are uncovered at any time throughout the life of the project the following actions will be implemented:

- Only areas that have previously been disturbed by mining activities or otherwise surveyed and cleared of any archaeological material will be disturbed during operations.
- Should any additional areas require ground disturbance as part of ancillary activities, an archaeological survey will be conducted prior to land disturbance occurring if the additional area has not already been subject to archaeological investigations.
- The results of any additional archaeological investigations will be conducted in consultation with relevant Aboriginal groups and government agencies and reported in the Annual Review.
- If Aboriginal or non-Aboriginal heritage items are encountered, work would cease immediately in the vicinity of the find to allow a qualified archaeologist to assess the finds.
- A buffer of 20m x 20m would be established around the suspected item of Aboriginal heritage significance
- The qualified archaeologist or the DPHI would be contacted to assess the discovery and prepare an assessment report, including recommended mitigation measures. The draft report would then be provided to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) as well as representatives of the local Aboriginal community.

- The archaeologist would consult with the DPHI (formerly OEH) and registered Aboriginal stakeholders concerning the significance of any Aboriginal or historic cultural material identified. No further earth disturbing works would be undertaken in the vicinity of the suspected item of Aboriginal heritage significance until the area has been assessed.
- Heritage NSW should be notified.

3.3. Discovery of skeletal remains

If suspected human skeletal remains are uncovered at any time throughout the life of the Project the following actions will be implemented:

- The suspected skeletal remains would not be touched or disturbed.
- A buffer zone of 50m x 50m would be established around the suspected remains and all work in the vicinity of the suspected remains would be suspended until the area has been assessed.
- The NSW Police, and the DPHI would be contacted to assess the discovery. If appropriate, mitigation procedures would then be developed in consultation with DPHI and the registered stakeholders.
- If the skeletal remains are found to be older than 100 years but non-Aboriginal, the Manager will:
 - Notify Heritage NSW; and
 - Await further advice before proceeding with work in the area.

4. COMMUNICATION

4.1. Engagement Protocol

The communication protocol will consist of:

- Aboriginal stakeholders to be invited to be involved in any additional archaeological surveys of the Woodlawn Project should these be required in future.
- Aboriginal stakeholders to be invited to review any future archaeological assessment reports prior to finalisation.
- Ongoing liaison with Aboriginal stakeholders will occur as required during the assessment, approval and subsequent management phases for any new projects within SML20 which fall under the State Significant Development approval process.

4.2. Public access to information

This Plan falls under the Environmental Management Strategy (EMS) for the Woodlawn Project which requires the public reporting of monitoring data required by EPL 20821 and management plans prepared under PA07_0143 and EPL 20821. This document will therefore be publicly available on the DEVELOP web site as will any updates or reviews during the life of the Project.

5. COMUNICATION, REPORTING AND REVIEWS

5.1. Internal training and awareness

During site inductions, all DEVELOP employees, contractors, sub-contractors and visitors, will be notified that they have responsibilities under the *National Parks and Wildlife (NPW) Act 1974* for management of aboriginal heritage as outlined under this Plan.

5.2. Reporting

All environmental monitoring requirements specified in EPA licences and approvals are undertaken and the data maintained on site in data management systems. Copies are provided for internal review as required by the General Manager. A summary of the data is provided to regulatory authorities as required by statutory approvals. Other data collected as part of projects or auditing procedures are reported internally in accordance with the Environmental Management Strategy verification procedures.

In accordance with Project Approval Schedule 6 Condition 4 an Annual Review will be prepared in accordance with the Department of Planning *Post Approval requirements for state significant mining development Annual Review Guideline* dated October 2015 (or more recent edition if appropriate). A copy of the Annual Review will be made available on the DEVELOP web site as follows: <http://develop.com.au/Woodlawn-sustainability/>

Monitoring data required by the EPL will be reported on the company's web page in accordance with EPA requirements for public disclosure, and as per Schedule 6 Condition 11 of the Project Approval <http://develop.com.au/Woodlawn-sustainability/>.

5.3. Complaints

Operational related complaints may be received:

- Directly via the Community Hotline (available 24/7): 1800 371 124
- Directly via the website: <https://www.develop.com.au/contact-us/>
- Directly via the CCC
- Indirectly via government agencies

The Environmental Management System includes more detail on the complaints management procedure. A complaints register is updated monthly and is publicly available on the DEVELOP website.

5.4. Incident reporting

Incident reporting will be carried out in accordance with Schedule 6, Condition 7 of the Project approval. DEVELOP will notify the Secretary and any other relevant agencies of any incident associated with the Project as soon as practicable after the becoming aware of the incident. Within seven days of the date of the incident, DEVELOP will provide the Secretary and any relevant agencies with a detailed report on the incident.

5.5. Review and continuous improvement

The HMP will be reviewed and updated annually or in the case of a significant operational change. The review will include an assessment of the effectiveness of control measures and performance against the Plan's objectives. The objectives of a review are to:

- Maintain compliance with statutory requirements.
- Identify opportunities for improvement in the management plan.
- Incorporate community considerations.

The HMP review will include:

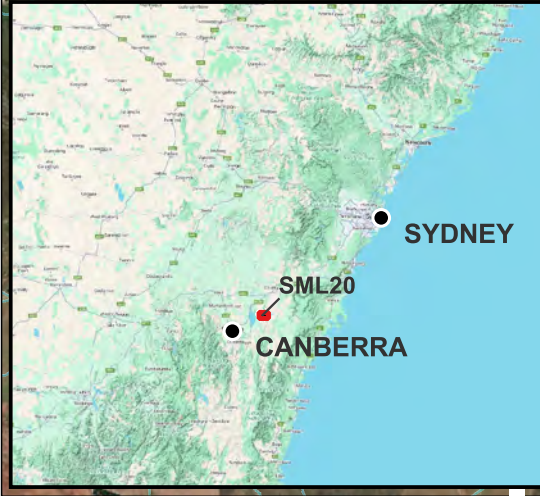
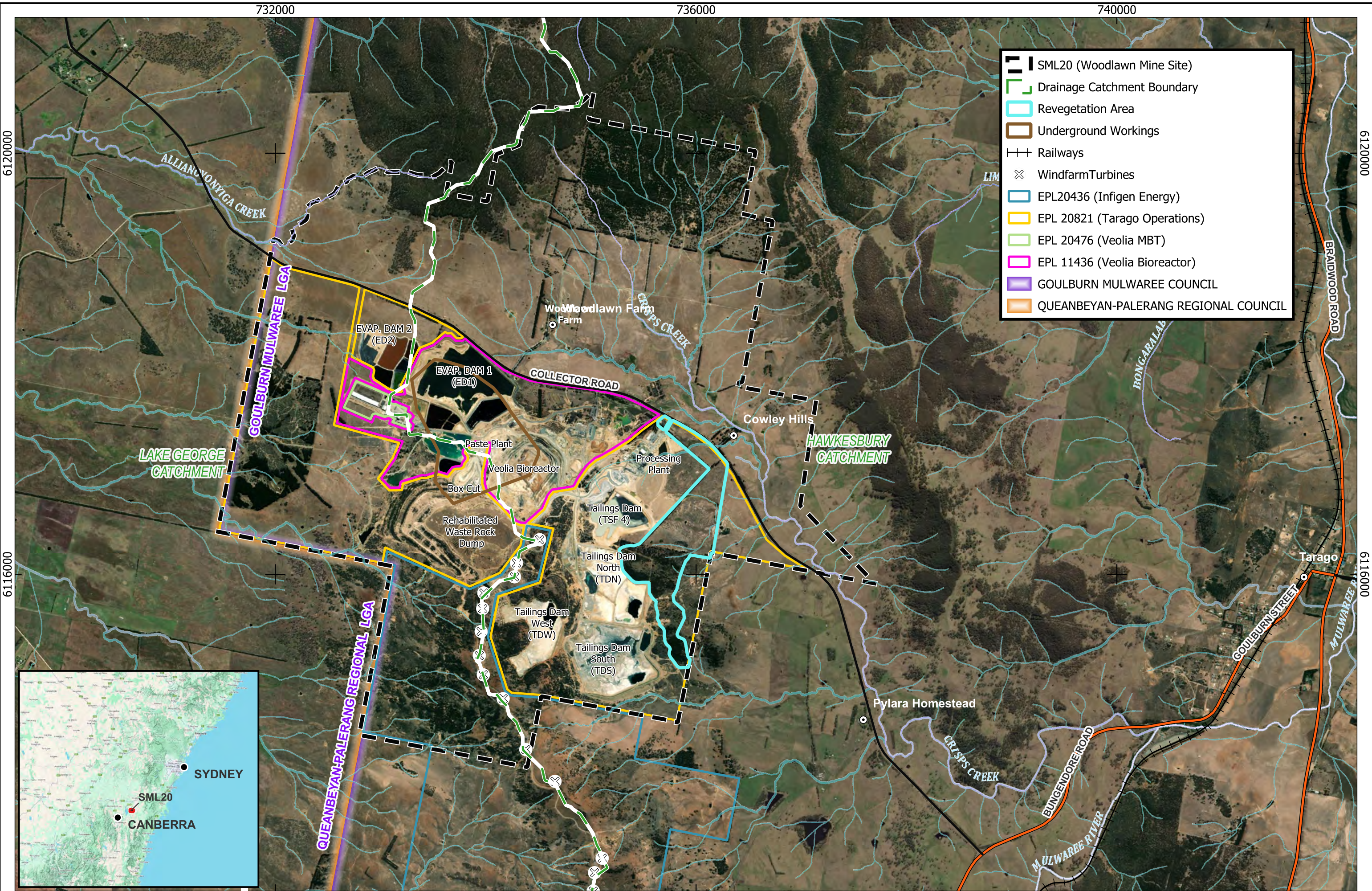
- This document.
- Legislation, approval, license changes.
- Community complaints and enquiries.

As per Schedule 6 Condition 5, DEVELOP will review, and if necessary, revise the HMP within 3 months of:

- the submission of an annual review;
- the submission of an incident report;
- the submission of an audit report; or
- any modification to the conditions of this approval.

Where the review leads to revisions in the HMP, then within 4 weeks of the review the revised document will be submitted to the Secretary for approval.

Appendix 1 Plans



1 2 km

Scale: 1:32,000 MGA94 (Zone 55)

VTX-JOB-0473-MAP-02

Date: 2025-6-26



DEVELOP

Author: C Hobbs

Requested By: K Crook

WOODLAWN ZINC COPPER PROJECT

Site Plan

Appendix 2 Consultation log - HMP

Date	Form / Agency	Comments and Outcomes	Response/how addressed
07/01/2025	Heritage NSW	Letter received via the major projects portal. Only recommendation that Heritage NSW should be notified following any unexpected finds or suspected skeletal material	Line added/updated in Section 3.2 and Section 3.3
06/01/2025	Heritage Council of NSW	Site is not listed on the State Heritage Register or in the immediate vicinity of any items. No heritage comments required.	None required
14/6/2016	Response from Pejar Local Aboriginal Land Council (2 emails in total)	Seeking clarification on the location of previously identified sites. These were found to be located beyond the boundaries of SML20 and were discovered as part of surveys undertaken by Infigen and the Woodlawn Windfarm Project.	Noted, no further actions required
10/6/2016	Email to OEH, Buru Ngunnawal Aboriginal Corporation, Gundungurra Tribal Aboriginal Corporation, Pejar Local Aboriginal Land Council	Copy of Heritage Management Plan provided to each group and OEH for comment	Noted
27/5/2016	Email to Allison Treweek OEH seeking comments on Vegetation Management Plan	Copy required for review and comment	Noted
13/10/14	Meeting with EPA and OEH Queanbeyan Office	General Project briefing, need for EPL separation with Woodlawn Bioreactor (Veolia) EPL, monitoring conditions, lack of archaeology sites and impact, need to define vegetation offset area and outcomes	Ongoing negotiation with EPA in relation to licensing requirements
9/10/14	Email to Sandie Jones OEH	Copy of Planning Approval and plans of development area	Noted
3/7/2014	Initial consultation letter to: • NSW Trade and Investment • Environment Protection Authority • NSW Office of Water • Sydney Catchment Authority • Office of Environment and Heritage • Department of Planning and Environment (DPE)	These letters were the initial consultation and sought specific advice from each agency according to the respective relevant management plan.	

Appendix 3 Plan Approval