

Appendix Z

Aboriginal cultural heritage assessment

Aboriginal Cultural Heritage Assessment

Woodlawn Advanced Energy Recovery Centre

Prepared for Veolia Environmental Services (Australia) Pty Ltd

July 2022

Aboriginal Cultural Heritage Assessment

Woodlawn Advanced Energy Recovery Centre

Veolia Environmental Services (Australia) Pty Ltd

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Content warning

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Executive Summary

Veolia Environmental Services (Australia) Pty Ltd (Veolia) owns and operates the Woodlawn Eco Precinct (the Eco Precinct), located on Collector Road, approximately 6 kilometres (km) west of Tarago, approximately 50 km south of Goulburn and 70 km north of Canberra. The Eco Precinct is located in the Goulburn Mulwaree local government area (LGA). Veolia is proposing to develop and operate the Woodlawn Advanced Energy Recovery Centre (ARC), an energy recovery facility (ERF), at the Eco Precinct. The ARC will be designed to recover energy from waste that would otherwise be disposed of to landfill.

The project is being assessed under Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The project has been classified as a State significant development (SSD) under the EP&A Act, and as such requires an Environmental Impact Statement (EIS) to consider the environmental impacts of the project. This Aboriginal cultural heritage assessment (ACHA) has been prepared to support the EIS. It documents the results of archaeological investigations undertaken to identify the extent and significance of any physical remains and intangible values of past Aboriginal visitation, use and occupation within the project area.

Aboriginal consultation for the ACHA has conformed with Heritage NSW's *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW, 2010), and included provision of information on registered Aboriginal parties (RAPs), and notification of the various field survey and excavation activities associated with the project. The consultation process initially identified 48 Aboriginal stakeholder organisations with potential interest in the project area. Following a notification process, 14 responded to be registered for subsequent consultation through the project, including the Pejar LALC and a number of Ngunnawal traditional owner groups. Due to the COVID outbreak in July–September 2021, an online meeting was given to provide a virtual tour of the development footprint, and discussions of intangible values was undertaken. Nine of the RAPs attended the meetings. With the easing of restrictions, a field survey was subsequently undertaken in late November 2021, and four RAPs were available to participate. Feedback from the RAPs has generally been positive, with few project-specific concerns raised. There was strong desire for RAPs to further explore socio-economic and interpretive actions with Veolia.

Previous archaeological studies of the region have all provided a consistent and good understanding of the past peopling, visitation and occupation of the project area and surrounds. They indicate that the vast majority of the cultural materials recovered show that the use of the region was increasingly common only in the last 5,000 years as climatic conditions stabilised. Visitation then appeared to remain seasonal and/or infrequent, perhaps reflecting the cool and windy conditions experienced across the region in the winter months. These activities appear to be focussed on major waterbodies such as Lake George and Lake Bathurst, each some 8 kilometres (km) either side of the project area. A review of the Cultural Heritage Management (CHM) investigations and the Aboriginal Heritage Information Management Systems (AHIMS) database indicate that the cultural materials that demonstrate this past behaviour is almost exclusively in the form of surface and/or shallowly buried stone artefacts. These are typically found adjacent to water courses, and/or on elevated areas. There are occasional discoveries of deeper and/or older buried cultural material associated with major alluvial and/or colluvial environments adjacent to big river systems and bases of slopes, respectively. There are also infrequent references to culturally modified trees.

With specific reference to the project area, there is currently no documented evidence of cultural materials. A study of the adjacent Woodlawn Wind Farm undertaken in 2004 and 2010 identified a small number of stone artefacts on the crest overlooking the site – none of these are in close proximity to the development footprint (Biosis 2004, 2010). Further, the potential for cultural materials is considered unlikely given the historical and modern activities that have occurred within the project area. Specifically, the last 50 years have seen the establishment of a mining operation followed by the development of the Eco-Precinct.

These have resulted in substantial earthworks and remediation that will have impacted and/or destroyed cultural materials if ever present. In the case of the development footprint, the encapsulation cell is proposed to be within an existing artificially created evaporation dam that has been excavated at least 2 metres (m) below the natural ground surface. The ARC similarly appears to be a benched platform cut into the surrounding slopes, and is probably 1–2 m below the original ground surface. While a detailed field survey was not feasible due to COVID restrictions, a brief site inspection on 2 June 2021 validated many of these desktop observations. Specifically, that the development footprint exhibited no evidence of pre-European landscapes or areas where they may be expected. A study undertaken in 1998 of the project area by Navin Officer Heritage Consultants reached similar conclusions.

No cultural materials have been identified within the project area, nor are expected to occur. No intangible values for the study area have been identified to date. As such, it is considered that there would be no impacts to Aboriginal heritage.

Recommendations are proposed for inclusion in the EIS to guide post-approval requirements for Aboriginal heritage. These include (further discussion is presented in Section 10.2):

- Prior to ground disturbance, an Aboriginal cultural heritage management plan (ACHMP) must be developed by a heritage specialist in consultation with the Aboriginal stakeholders and consent authority to provide the post-approval framework for managing Aboriginal heritage within the project area. The ACHMP should include the following aspects:
    - Process, timing, and communication methods for maintaining Aboriginal community consultation and participation through the remainder of the project.
    - Process, timing and methods for the RAPs to visit the project area before any development activities are initiated, identify any cultural concerns and further discuss any mitigation measures that may be required for the project.
    - Descriptions and methods of any additional investigative and/or mitigative archaeological actions that may be required, prior to works commencing or during the project. These may include cultural inductions for all personnel and subcontractors outlining the past history and sensitivity of the region, archival recording, archaeological field survey, excavation and/or cultural monitoring for any areas where the surface impacts of the project intersect the identified Aboriginal objects and/or sites, and/or areas of archaeological sensitivity (specifically as presented in Figure 7.1 of this ACHA), and any additional requirements identified by the Aboriginal community.
    - Description and methods of post-excavation analysis and reporting of any archaeological investigations and activities implemented as part of the ACHMP. For excavations, these should include suitable collection and processing of stone artefacts, and chronological, soil, and environmental samples.
    - Description and methods for undertaking further Aboriginal heritage assessment, investigation and mitigation of any areas of the development footprint that have changed following completion of the Aboriginal heritage assessment and/or during the final design and construction phases of the project.
    - Procedures for managing the unexpected discovery of Aboriginal objects, sites and/or human remains during the project.
    - Procedures for the curation and long-term management of cultural materials recovered as part of the works outlined in the ACHMP and any preceding stages associated with the project.

- Processes for reviewing, monitoring, and updating the AHMP as the project progresses.

- The Construction Environment Management Plan (CEMP), or equivalent, should reinforce how the cultural landscape is considered throughout the project and detail the rehabilitation of the project area. This should be undertaken in consultation with the RAPs.

- Consultation should be maintained with the RAPs during the finalisation of the assessment process and throughout the construction phase of the project. Details for how this consultation should be undertaken will be outlined in the ACHMP.

- A copy of the ACHA should be lodged with AHIMS and provided to each of the RAPs.

Where the heritage consultant changes through the project, suitable hand over should occur to minimise loss or mistranslation of the intent of the information, findings and future steps in heritage management.

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1 Introduction

1.1 Background

Veolia Environmental Services (Australia) Pty Ltd (Veolia) owns and operates the Woodlawn Eco Precinct (the Eco Precinct), located on Collector Road, approximately 6 kilometres (km) west of Tarago, approximately 50 km south of Goulburn and 70 km north of Canberra. The Eco Precinct is located in the Goulburn Mulwaree local government area (LGA). The Eco Precinct has provided sustainable and innovative waste management services since 2004.

The Eco Precinct comprises the following integrated waste management operations, energy recovery technologies and energy generation, and other sustainable land uses, including the following:

- Woodlawn Bioreactor (the Bioreactor) – a landfill facility in which leachate is recirculated to help bacteria break down the waste, enhancing the early generation of gas, enabling more efficient capture and extraction of landfill gas, including leachate and landfill gas management systems.
- Woodlawn BioEnergy Power Station – utilises landfill gas from the Bioreactor to generate electricity.
- Woodlawn Mechanical Biological Treatment (MBT) Facility – processes MSW to extract the organic content for use in tailings dam remediation.
- Agriculture – includes a working farm (sheep and cattle) that applies sustainable management practices.
- Aquaculture and horticulture – use of captured waste heat from the BioEnergy Power Station for use in sustainable fish farming and hydroponic horticulture at the Eco Precinct.
- Renewable energy generation – the Woodlawn Wind Farm (operated by Iberdrola) which has an installed capacity to generate up to 48.3 MW and a solar farm (operated by Veolia) with installed capacity to produce up to 2.3 MW.

The Eco Precinct is served by the Crisps Creek IMF near the village of Tarago. Crisps Creek IMF is approximately 6 km to the east of the Eco Precinct (8.5 km by road). Operations are augmented by two waste transfer terminals located in Sydney; the Clyde Transfer Terminal, which commenced operation in 2004 with the Bioreactor and Crisps Creek IMF, and the Banksmeadow Transfer Terminal, (commenced operation 2016).

Waste is transported from the Sydney transfer terminals in purpose-built shipping containers by rail on the Goulburn-Bombala Railway line to the Crisps Creek IMF from the Eco Precinct. At the Crisps Creek IMF the containers are loaded on to trucks for delivery to the Eco Precinct. Waste from the local area is also approved to be transported to the Eco Precinct by road.

Veolia proposes to develop and operate the Woodlawn Advanced Energy Recovery Centre (ARC) (the project), an energy recovery facility (ERF), at the Eco Precinct. This involves the development of an additional waste management technology at the Eco Precinct, processing a portion of the waste stream which is already approved to be received as part of integrated waste management operations, and recovering energy from the process.

1.2 Project overview

The project will involve construction and operation of the following key components comprising the ARC:

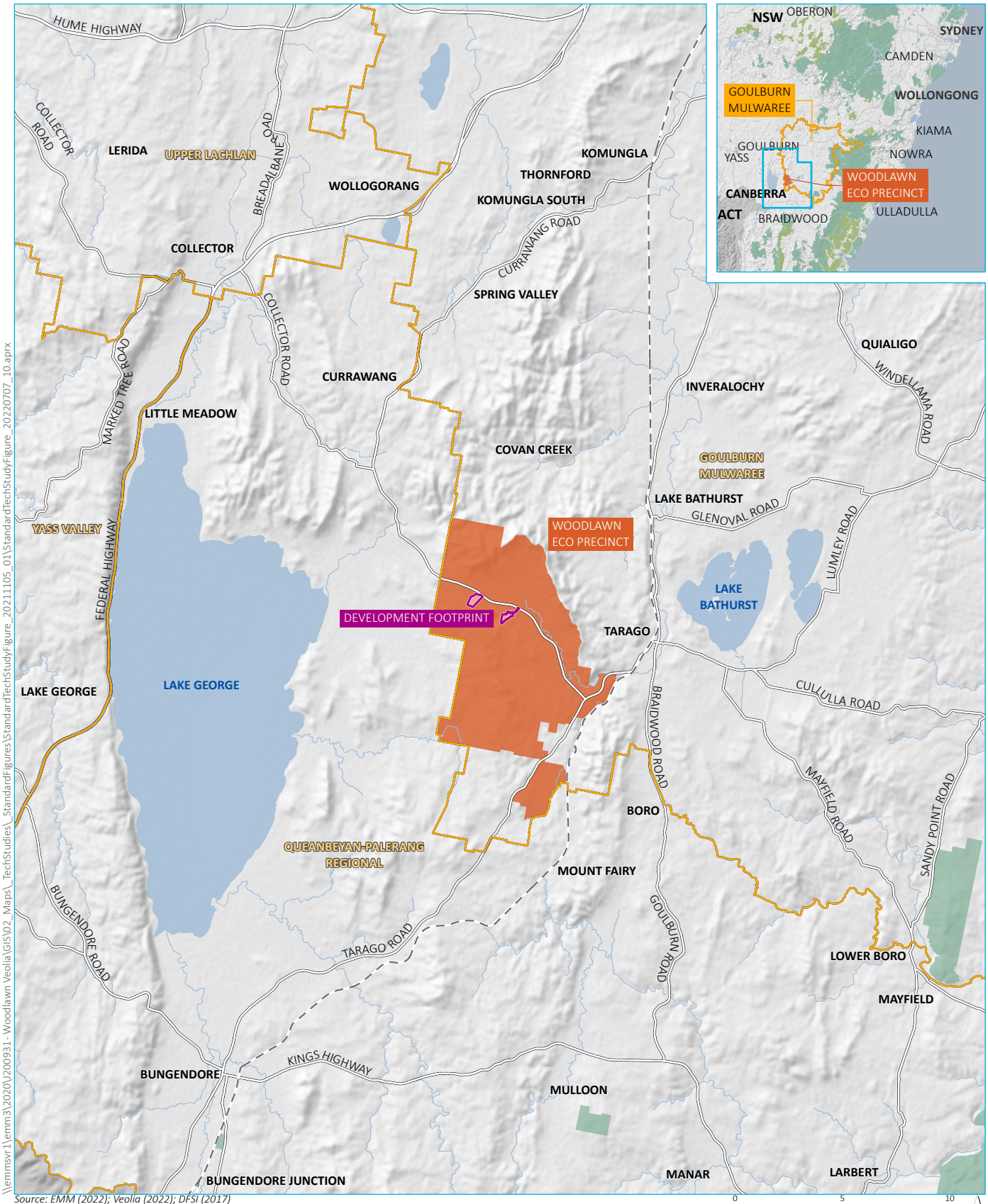
- construction of the ARC, comprising an ERF for the thermal treatment of residual municipal solid waste (MSW) and commercial and industrial (C&I) waste (the residual waste feedstock) that will otherwise be disposed of to landfill;

- thermal treatment in the ARC of approximately 380,000 tonnes per annum (tpa) of the residual waste feedstock;
- capacity to generate approximately 30 megawatts (MW) of electricity;
- on-site management of residual by-products generated by the ARC, including construction of an encapsulation cell; and
- construction of ancillary infrastructure to facilitate construction and operation of the project, including a new access road.

1.3 The development footprint

For the purposes of this assessment, the following definitions have been adopted:

- The project area is the broad area of investigation which includes the ARC and the encapsulation cell (Figure 1.1 and 1.2):
  - The ARC development footprint encompasses the main ARC building and ancillary infrastructure, incinerator bottom ash (IBA) maturation area and ash handling equipment, substation, roads, etc.
  - The encapsulation cell development footprint encompasses the lined and engineered landfill cell for the encapsulation of air pollution control residues (APCr) and associated leachate pond.
- The development footprint is the extent of actual surface disturbance proposed by the project and assessed in this ACHA. All works and disturbance will occur within the development footprint.



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Source: EMM (2022); Veolia (2022); DFSI (2017)

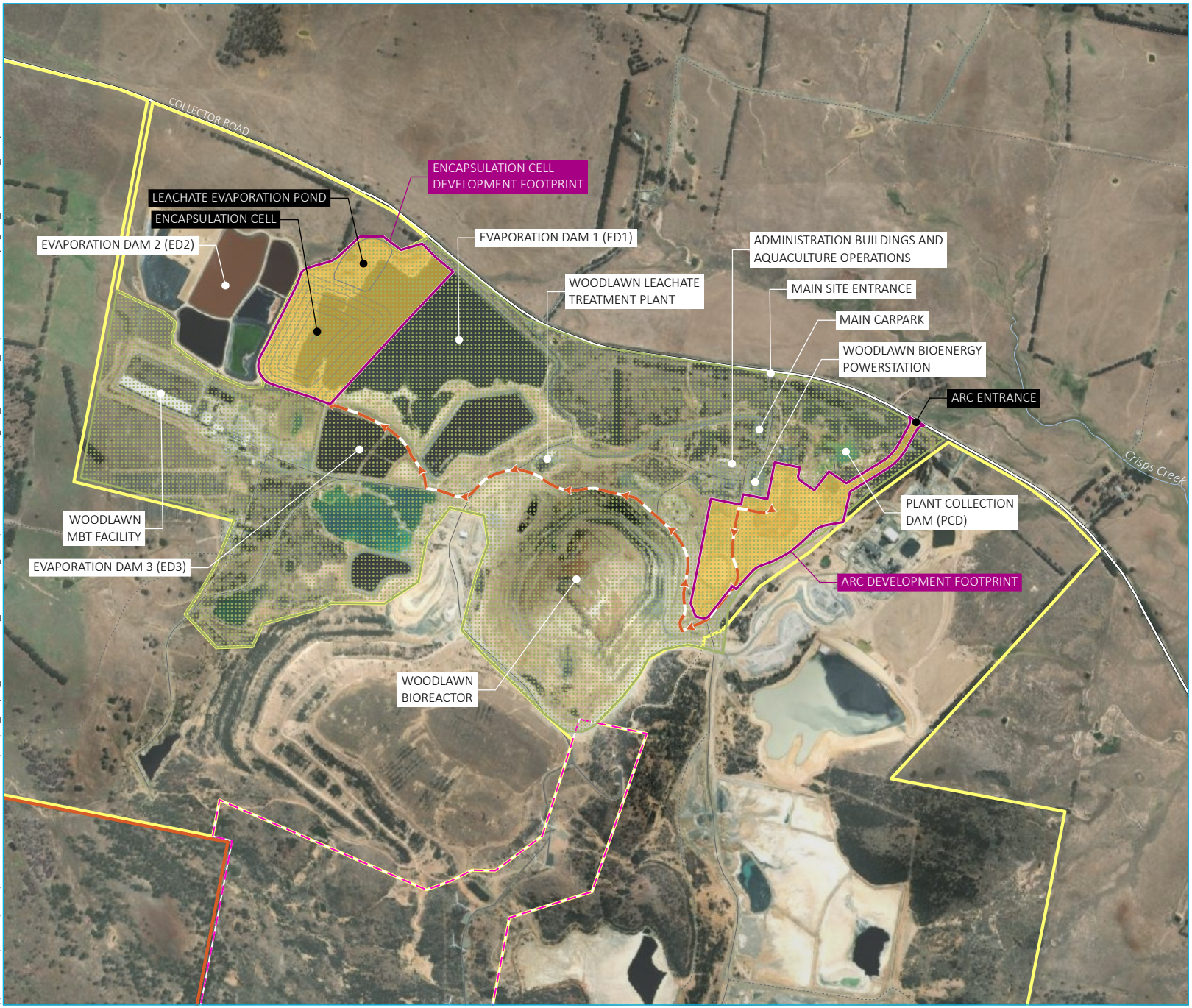
KEY

- Development footprint
- Woodlawn Eco Precinct
- Rail line
- Major road
- Watercourse
- Named waterbody
- NPWS reserve
- Local government area

Regional context

Woodlawn Advanced Energy Recovery Centre
Aboriginal cultural heritage assessment
Figure 1.1

EMM
creating opportunities



KEY

- Development footprint
- Veolia integrated waste management operations
- Woodlawn Eco Precinct
- Woodlawn Mine operations area
- Woodlawn Wind Farm
- APCr transport route
- Major road
- Minor road
- Vehicular track
- Watercourse

Project area

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Source: EMM (2022); Veolia (2022); DFSI (2017)

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N

Woodlawn Advanced Energy Recovery Centre
Aboriginal cultural heritage assessment
Figure 1.2

EMM
creating opportunities

1.4 Purpose of this report

The project is being assessed under Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The project has been classified as a State Significant Development (SSD) under the EP&A Act, and as such requires an Environmental Impact Statement (EIS) to consider the environmental impacts of the project. The contents of the EIS are dictated by the Secretary's Environmental Assessment Requirements (SEARs) issued by the NSW Department of Planning, Industry and Environment (DPIE) (Section 1.5). The SEARs included requirements for the investigation of Aboriginal heritage in accordance with Heritage NSW guidelines.

This Aboriginal cultural heritage assessment (ACHA) has been prepared to support the EIS. It documents the results of archaeological investigations undertaken to identify the extent and significance of any physical remains and intangible values of past Aboriginal visitation, use and occupation within the project area. The objectives of the investigation were to:

- consult with and involve key Aboriginal community members and knowledge holders to identify areas and places of cultural value within or in the vicinity of the project area;
- compile a review of existing environmental, historical and archaeological information for the project area, by identifying and summarising known and previously recorded Aboriginal heritage places, cultural values areas and landforms of archaeological interest in its immediate surrounds;
- determine if any Aboriginal objects, places, cultural values areas, or areas of archaeological potential are present (or are likely to be present) within the development footprint, as well as areas of existing disturbance, through ground-truthing, including field survey;
- identify the type, nature, and extent of any Aboriginal sites, objects, archaeological deposits, potential archaeological deposits, and cultural values areas within the development footprint;
- map the locations of known and potential Aboriginal sites, objects and deposits and cultural values areas identified;
- assess the archaeological and cultural significance of the development footprint;
- assess and identify heritage constraints and opportunities and the potential impacts of the project; and
- identify and recommend measures to mitigate any heritage impacts and risks to the project.

1.5 Legislative context

There are several Commonwealth and State Acts (and associated regulations) that manage and protect Aboriginal cultural heritage (Annexure A provides further details). These are summarised in Table 1.1.

Table 1.1 Commonwealth and State legislation relevant to the project.

Legislation	Description	Relevant to the project?	Details
Commonwealth			
Environment Protection and Biodiversity Conservation Act 1999	Recognises sites with universal value on the World Heritage List (WHL). Protects Indigenous heritage places with outstanding heritage value to the nation on the National Heritage List (NHL), and significant heritage value on the Commonwealth Heritage List (CHL).	No	There are no Indigenous heritage places within the project area that are listed on the WHL, NHL, or the CHL.
Native Title Act 1993	Established a system for recognising Aboriginal and Torres Strait Islander peoples' rights and interests over lands and waters by Aboriginal people. Provides for negotiation and registration of Indigenous Land Use Agreements (ILUAs). Often used in NSW to identify relevant stakeholders for consultation.	No	There are no active claims encompassing the development footprint.
Aboriginal and Torres Strait Islander Heritage Protection Act 1984	Preserves and protects declared areas and objects of particular significance to Aboriginal and Torres Strait Islander people that are under threat from injury or desecration.	No	There are no areas or objects within the project area subject to a Declaration under the Act.
State			
Environmental Planning and Assessment Act 1979	Requires environmental impacts, including to Aboriginal heritage, to be considered in land use planning. Provides for the development of environmental planning instruments, including State Environmental Planning Policies and Local Environmental Plans.	Yes	The project is being assessed as an SSD project under Part 4, Division 4.7, of this Act, and is subject to project-specific environmental assessment and reporting requirements (Section 1.5.1). These requirements (SEARs) stipulate that Aboriginal heritage impact assessment is required (in accordance with standard Heritage NSW procedures and guidelines) to assess whether the project has the potential to impact on Aboriginal objects, sites, or places of Aboriginal heritage significance.
National Parks and Wildlife Act 1974	Provides blanket protection for all Aboriginal objects and declared Aboriginal places. Includes processes and mechanisms for development where Aboriginal objects are present, or where Aboriginal Places are proposed for harm.	Yes	While an Aboriginal heritage impact permit to harm tangible Aboriginal cultural heritage under this Act is not required for SSD projects, the SEARs applies guidelines prepared under this Act relating to consultation and assessment of impacts of SSD projects on cultural heritage.

Table 1.1 Commonwealth and State legislation relevant to the project.

Legislation	Description	Relevant to the project?	Details
Aboriginal Land Rights Act 1983	Establishes Local Aboriginal Land Councils (LALCs). Allows transfer of ownership of vacant crown land to a LALC. The Office of the Registrar, *Aboriginal Land Rights Act 1983 (ORALRA)*, registers Aboriginal land claims and maintains the Register of Aboriginal Owners. Often used in NSW to identify relevant stakeholders for consultation.	No	The project area is within the boundaries of the Pejar Local Aboriginal Land Council, which is a RAP for this project and has been consulted. A request to search the Register of Aboriginal Owners was made to the ORALRA on 28 May 2021. The project area does not appear to have Registered Aboriginal Owners pursuant to Division 3 of the Act.

1.5.1 Assessment guidelines and requirements

This ACHA has been prepared in accordance with the Secretary's Environmental Assessment Requirements (SEARs) for the project (SSD#21184278), issued on 2 July 2021, as well as relevant government assessment requirements, guidelines and policies, and in consultation with the relevant government agencies.

The SEARs must be addressed in the EIS. Table 1.2 lists the matters relevant to this assessment and where they are addressed in this report.

Table 1.2 Relevant matters raised in the SEARs

Requirement	Section addressed
Aboriginal Cultural Heritage –	
an Aboriginal Cultural Heritage Assessment Report (ACHAR) which must:	
• be prepared in accordance with the Code of Practice for Archaeological Investigation in NSW (DECCW, 2010), and guided by the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales (OEH, 2011)	Entire report
• identify, describe and assess impacts on the Aboriginal cultural heritage values that exist across the development	Sections 7-9
• provide evidence and details of consultation with Aboriginal people in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW, 2010).	Section 2 and Annexure B

1.6 Limitations

This report is based on existing and publicly available environmental and archaeological information (including AHIMS data) and reports about the project area. The background research did not include any independent verification of the results and interpretations of externally sourced existing reports (except where the ground-truthing was undertaken).

This report further makes archaeological predictions based on these existing data and targeted ground-truthing, and which may contain errors depending on the accuracy of these third party studies and the extent of ground-truthing (constrained to surface) investigations.

On site access and investigation of the development footprint has been limited during the development of the ACHA due to the ongoing COVID outbreak. This has limited the ability of both EMM personnel and registered Aboriginal parties (many not local to the site) from attending the project area. We outline how Aboriginal consultation and on-site activities were achieved during the ACHA process, and have made recommendations in future stages to address any perceived inadequacies.

This report does not consider historical and/or built heritage unless specifically related to Aboriginal heritage values. Such heritage items are addressed in a separate report undertaken for the project and appended to the EIS.

2 Aboriginal consultation

2.1 Key findings

- Consultation with Heritage NSW has conformed with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW, 2010) and has included provision of contact information for registered Aboriginal parties (RAPs), and notification of the on-site and/or online activities associated with the project.

- The consultation process initially identified 48 Aboriginal stakeholder organisations with potential interest in the project area. Following a notification process, 14 responded to be registered for subsequent consultation through the project, including the Pejar LALC and a number of Ngunnawal traditional owner groups.

- Due to the COVID outbreak in July-September 2021, on-site activities with the registered Aboriginal parties was not feasible. Instead, an on-line meeting to provide a virtual tour of the development footprint, and discussions of intangible values was undertaken in August 2021. Nine of the registered Aboriginal parties attended the meetings.

- Feedback from the registered Aboriginal parties has generally been positive, with few project specific concerns raised. There was strong desire for RAPs to be offered an opportunity to attend the site and be on Country in subsequent stages of the project, as well as to further explore socio-economic and interpretive actions with Veolia. With the easing of restrictions, a site visit with four RAPs was undertaken in late November 2021 to address some of these comments.

2.2 The process

Aboriginal consultation for this project has been undertaken in accordance with procedures set out in the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW, 2010). These guidelines identify a five-stage process:

1. pre-notification – identification of the Aboriginal individuals and/or communities relevant to the project area by contacting several state government agencies;

2. notification – contacting all Aboriginal individuals and/or communities identified in Stage 1 to determine their interest in being consulted during the project. This includes direct communication and the placement of advertisements in local media seeking further expressions of interest from Aboriginal individuals and/or communities that may have been missed through Stage 1. Those Aboriginal individuals and/or communities that wish to be consulted become a 'registered' Aboriginal party (RAP);

3. presentation of project information/assessment methodology – briefing RAPs about the project and scope of any Aboriginal heritage assessment and investigations. This is usually undertaken through written correspondence, but can include meetings, and may undergo several iterations through the project as the nature of the assessment changes (eg surface ground-truthing may lead to a requirement for test excavations);

4. impacts and mitigation strategies – discussion of potential impacts to cultural materials and mitigation options with the RAPs prior to developing the ACHA. This is often undertaken either onsite at the end of any field program and/or as part of Stage 5; and

5. report review – the RAPs are provided an opportunity to review and comment upon the draft ACHA, to contribute input into the overall findings, significance and management of cultural heritage.

The consultation process for this project had two aims:

I) to comply with the Heritage NSW consultation procedures to obtain input on the ACHA process; and

II) to identify cultural places and intangible values that may be affected by the proposed activity.

2.3 This project

Aboriginal consultation for this project has been undertaken in accordance with procedures set out in the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW, 2010). These guidelines identify a four-stage process, which is summarised for the project in Table 2.1. A complete consultation log is provided in Annexure A.

Overall, the consultation process identified 48 Aboriginal stakeholders in the region (Annexure B.1). Subsequently following a notification process, some 14 of these registered an interest in the project (Annexure B.2). These included: Pejar Local Aboriginal Lands Council, Didge Ngunawal Clan, Ginninderra Aboriginal Corporation, Corroboree Aboriginal Corporation, Muragadi, Konanggo Aboriginal Cultural Heritage Services, Ngunnawal Elders Corporation, Yurwang Gundana Cultural Heritage Services, Ngunawal Heritage Aboriginal Corporation, Woka Aboriginal Corporation, Freeman & Marx Pty Ltd, Yurrandaali Cultural Services, Thunderstone Aboriginal Cultural Services Pty Ltd, and Gunjeewong Aboriginal Corporation.

Information on the project and on the proposed assessment methodology was provided to these organisations, or RAPs, in July 2021. A site investigation was proposed for August 2021, however, due to a COVID outbreak it proved unfeasible due to the lockdown restrictions in NSW and ACT at the time. Both EMM and RAP personnel were residents in either the Greater Sydney or ACT areas, and this restricted visitation to the site both by Veolia (for the safety of their employees) and NSW Health public health orders. To allow the RAPs an opportunity to get an indication of the project and conditions of the project area, a series of online meetings was offered. Nine of the RAPS participated in three on-line meetings held between 20-23 August 2021. The online meetings included an outline of the project, a history of the site (which has been subject to extensive impacts in the past), and a virtual tour of the development footprint using both maps and photographs taken earlier in the project. The outcomes of these meetings are presented in Section 2.4 and Annexure B.6.

The final stage included the distribution of a draft version of the ACHA to the RAPs for review, input and comment. This process is outlined further in Table 2.1 and Section 2.4.

Following extensive feedback of the desire for a site inspection and with the easing of restrictions, a site investigation was able to be undertaken in late November 2021. The site visit was offered to a number of the local RAPs, but ultimately four attended, including the Yurwang Gundana Cultural Heritage Services, Ngunawal Heritage Aboriginal Corporation, Freeman and Mark Pty Ltd, and Konanggo Aboriginal Cultural Heritage Services.

Table 2.1 Summary of Aboriginal consultation undertaken for the project

Consultation Stage	Description	Date Initiated	Date Completed	Notes
1	Government Agency Pre-Notification	28 May 2021	-	Additional details provided in Annexure B.4.
	Advertisement in the *Goulburn Post*	9 June 2021		A tearsheet is provided in Annexure B.4.
	Notification and registration of potential Aboriginal stakeholders	9 June 2021	23 June 2021	Additional details are provided in Annexure B.4.
2/3	Presentation of information about the proposed project; and gathering information about cultural significance	2 July 2021	30 July 2021	Additional details are provided in Annexure B.5.
	Aboriginal Focus Group Meeting	20 August 2012	23 August 2021	Additional details are provided in Annexure B.6.
	Site investigation	22 November 2021		Attended by four RAPs.
4	Review of draft report	17 September 2021	15 October 2021	Additional details are provided in Annexure B.6.

2.4 Aboriginal stakeholder feedback

As outlined in Section 2.3, a series of online meetings was undertaken with the RAPs. The outcomes of these meetings, included:

- All RAPs supported the completion of the ACHA based on the information provided, and had no major issues with the finalisation of the report and approval of the project, as long as opportunity in the post-approval was provided for Aboriginal people to visit and inspect the site, allow 'Connection to Country' and further exploration of any potential intangible connections.
- The need for suitable field survey and/or test excavations (if required) to occur at some point in the project, acknowledging that these may be post-approval. The area to the north of the proposed encapsulation cell location, which appeared less disturbed than other parts of the site, formed a focus of some of these discussions.
- Some discussions around socio-economic opportunities across the site (such as employment, education opportunities, etc). EMM has provided a contact list of RAPs to Veolia so this can be pursued independently of this assessment.

In addition to the meeting, the draft ACHA was provided to all RAPs for comment between 17 September 2021 and 15 October 2021. A reminder regarding the closing of the comment period was provided on 8 October 2021. All comments received are summarised here, and included in Annexure B.7:

- Didge Ngunawal Clan, Corroboree Aboriginal Corporation, and Gunjeewong Aboriginal Corporation all provided brief comments of support with regard to the recommendations proposed in this ACHA.
- Yurwang Gundana Cultural Heritage Services responded in support of the recommendations, and emphasised the need for on site activities. EMM noted that on site activities would be required prior to ground surface disturbance, and will be integrated into the proposed management plan (Section 10.3).

- Ngunawal Heritage Aboriginal Corporation responded in support of the recommendations, and emphasised the need for continued consultation and engagement with Aboriginal stakeholders for the duration of the project. EMM responded noting that continued consultation and engagement with Aboriginal stakeholders formed a key focus of the management recommendations (Section 10.3).

With the easing of restrictions a subsequent site visit was undertaken in late November 2021 to allow the RAPs to investigate the project area. These were attended by Dean Delponte (Ngunawal Heritage Aboriginal Corporation), Robert Young and Auntie Pamela Young (Konanggo Aboriginal Cultural Heritage Services), Shawn Williams (Freeman and Mark Pty Ltd), and Darren Young (Yurwang Gundana Cultural Heritage Services. Following the site investigation, discussions were undertaken with these participants, and no concerns over the project were identified. They acknowledged that the project area had been subject to extensive disturbance and the presence of tangible cultural materials was unlikely. Auntie Pamela Young indicated that this was 'sick Country' given the level of past disturbance, but that through providing the opportunity for attending the site, a process of community rejuvenation and reconciliation was being achieved; and there was a recommendation for subsequent interpretation and/or acknowledgement of Country to continue this reconciliation. Veolia propose to explore this through their broader established reconciliation processes. No specific intangible cultural values were identified during the site investigation.

3 Existing environment

3.1 Key findings

- The project area is situated within a well-resourced landscape, surrounded by a number of major water bodies and tributaries, including Lake George and Lake Bathurst. It formed a critical gap in the Great Dividing Range that may have connected these landscapes and provided a useful corridor for past Aboriginal movement.
- Climatically, the project area is an upland environment, and during significant downturns in the past would have been fairly inhospitable to long term or extensive occupation. As such, it was probably used only ephemerally or seasonally by Aboriginal people.
- Where not disturbed, the soil profiles of the project area have residual skeletal characteristics, with deeper colluvium found in localised environments typically at the base of slopes.
- The project area has been subject to extensive previous disturbance from pastoral, mining and recent waste management activities. The ARC is proposed to be situated on a former mine processing plant, which has resulted in major earthworks by potentially > 2 m from the natural ground surface. The encapsulation cell is proposed to be located within an existing evaporation dam from the former mining operations, and which has similarly had excavations >2 m below the natural ground surface. Based on these findings, no natural soil profile is considered to have been present in the development footprint.

3.2 Rationale

Understanding environmental context assists with predictions of archaeological potential, such as the likelihood of archaeological material being present in the landscape, its spatial distribution and its preservation. Landscape features were an important factor for the choice of camping and transitory and ceremonial areas used by Aboriginal people. Similarly, these landscape features and historical land-use plays a role in the level of preservation and the integrity of archaeological sites.

A landscape consisting of suitable topography, hydrology, geology and soils has strong links with natural resources that would have been available to, and sought after, by Aboriginal people. Flora and fauna would have provided food, tools and ceremony (culturally modified trees); proximity to fresh water was necessary for life and growing crops, as well as gathering fish and eels. Landscape features, such as sandstone overhangs, were useful for shelter; stone artefacts were manufactured from raw stone material that was collected from quarry sites; and stone arrangements relied on the landscape.

3.3 Landscape overview

Bioregions are relatively large land areas characterised by broad, landscape-scale natural features and environmental processes that capture large-scale geophysical patterns at an ecosystem scale. Sub-regions delineate significant geomorphic patterns within a bioregion, and are based on finer differences in geology, vegetation and biophysical attributes (Bannerman & Hazelton 1990; NSW NPWS 2003).

The project area lies within the South Eastern Highlands bioregion, which is bounded by the Australian Alps and South Western slopes to the south and west. The bioregion covers the dissected ranges and plateau of the Great Dividing Range that are topographically lower than the Australian Alps, which lie to the southwest. It extends to the Great Escarpment in the east and to the western slopes of the inland drainage basins (NSW NPWS 2003, p. 20).

Specifically, the project area is situated within the Monaro subregion, which is characterised by a sloping plateau, rising from 600 m in the north to 1,200 m in the south. This increase in elevation is associated with a ridgeline of the Great Dividing Range, which runs through the study area in a north-south alignment. However, the original topography has been extensively altered, primarily due to the excavation of the mine void, emplacement of waste rock dumps, and construction of evaporation and storage dams (see Section 3.8).

The Great Dividing Range and the Lachlan Fold Belt define the geographical and topographical elements of the project area. The underlying geology is formed of Palaeozoic granites, metamorphose sedimentary rocks and Tertiary basalts (NSW NPWS 2003). The region within which the project area sits has been named 'Lake George Gate'; for here, as described by Flood (1973, pp. 12-13), there is a complete break in the Great Dividing Range, forming a natural route across the Southern Tablelands.

The subregion features numerous shallow lakes and swamps, although many are closed basins. One such example is Lake George (*Weereewa* or *Ngara*), located approximately 8 km west of the project area, which represents a significant natural feature that is well documented as an Aboriginal meeting place and an area with cultural value. Lake Bathurst and the Shoalhaven River are situated a comparable distance to the east, and are similarly important bodies of water for past social and economic use.

3.4 Geology and geomorphology

The development footprint is situated over the Lachlan Fold Belt, a massive geological structure in south-eastern Australia. The Lachlan Fold Belt is a 700 km wide belt of deformed, deep and shallow marine sedimentary rocks, cherts, and mafic volcanic rocks formed in the Palaeozoic period (Grey 1997). The bedrock at the development footprint consists primarily of volcanic geological units that have undergone metamorphism, faulting and folding. Major, mapped faults and thrusts trending north-south are present in the project area and surrounds associated with the Captains Flat/Goulburn Synclinorial zones (Parsons Brinckerhoff 2012). Specifically, the Kildare Thrust runs north-south through the site (Braidwood 1:100,000 Geological Sheet 2017).

Reference to the Braidwood 1:100,000 Geological Sheet (2017) indicates the site overlies Siluro-Devonian aged Woodlawn Volcanics, Covan Creek Formation and older Ordovician Adaminaby Group, Abercrombie Formation. The outcropping geology at the site is shown in Figure 3.2. The Woodlawn Volcanics comprise the following volcanics: rhyolite, volcanic breccia, volcanic sandstone, conglomerate, tuffaceous siltstone and mudstone. The Abercrombie Formation comprises quartz and feldspar sandstone interbedded with siltstone and mudstone, while the Covan Creek Formation comprises quartzose sandstone and quartzite. Review of the site bore logs show dolerite, shale, tuff, siltstone and rhyolite are commonly intersected. There are minor intrusions of Siluro-Devonian aged pink granite and Currawang Basalt. Quaternary colluvium and minor alluvium are also mapped overlying the Woodlawn Volcanics, adjacent to Collector Road, comprising old fluvial and hillwash sediments. Quaternary Alluvium is mapped adjacent to Crisps Creek and associated tributaries. Parsons Brinkerhoff (2012) report the thickness of the colluvium ranges from 1 m at the top of hills to 5 m within valleys.

Review of geotechnical investigations around the evaporation dams, ED1 and ED2, shows the underlying geology comprises clays of medium to high plasticity with traces of fine sand and gravel. The alluvial sediments and residual clay units overlie the weathered bedrock, and the geological boundary separating these is not well known. The thickness of the alluvial sediments underlying ED1 ranges between 12 m to 19.5 m; this is thinner under ED2. Within the development footprint Golder (2021; Table 3.2) reported that a thin layer of fill, associated with existing site works, overlies silty residual soil profiles and weathered rock. The fill is approximately 0.2 m in thickness, and the soil profile and weathered rock is 2 m in thickness. The underlying competent fractured rock comprises predominately siltstone and a dolerite intrusion in the south.

Further west, outside the project area, pre-Quaternary alluvium, comprising old alluvial sands and gravels, is deposited along the eastern margin of Lake George and adjacent to watercourses. In the south-west, there is a series of dolerite sills.

3.5 Soil landscapes

Soil landscape classifications and their boundaries provide pre-defined areas that are classified by several geographic features, and which are informative for the archaeological investigation. They provide localised information including landform patterns, soils, geology, rock outcrop percentage, land use and vegetation. This information provides another layer to categorise the landscape for the predictive model, additional to what a topographic description can provide. Soil landscape information builds on underlying geology and describes the depths of residual soils and colluvial soils and identifies areas that are characterised by erosion or skeletal soils and exposed bedrock versus those that may contain a deeper profile, such as alluvium, where cultural material may be buried.

Soil landscape mapping by the Soil Conservation Service of NSW and the Department of Planning, Industry and Environment (DPIE) indicates the majority of the development footprint is classified as disturbed terrain. Disturbed terrain is defined as terrain that has been disturbed by human activity to a depth of at least 100 cm. The original soil in this landscape has been removed, greatly disturbed and/or buried, and the landscape generally levelled. While these maps are not always accurate, as is outlined in Section 3.8, the development footprint has likely been impacted to significant depths historically. Typically, cultural material is constrained to the topsoil units (ie A1 horizon) and the disturbance and/or removal of this unit has likely adverse implications regarding the potential for and survivability of cultural materials.

Remnants of Kalbili variant B landscape are present in a small section to the north of the development footprint for the proposed encapsulation cell (ie outside the development footprint, but within the project area). This soil landscape is a transferral soil landscape, which generally form as deep deposits of mostly eroded parent materials washed from areas directly upslope (ie colluvium). On the gently undulating plain to the north of the project area, this soil landscape typically presents as up to 20 cm of brown sandy loam overlying up to 40 cm of yellowish sandy loam, with a total topsoil depth of <60 cm (Felton and Huleatt 1975). However, this mapping is based on aerial photographs and desktop research, and the disturbed terrain classification seems a more probable classification for the development footprint, with the possible exception of areas north of the encapsulation cell along Collector Road. If present, however, given the potential for these deposits to be relatively deep, surface and/or buried cultural material may be present.

Table 3.1 Soil landscapes of the project area

Soil landscape and type	Landform pattern and hydrology	Landform elements	Slope and relief	Geology	Soil summary	Implications for archaeology
Disturbed terrain	Wide open valleys. There are no natural creeklines within the project area.	Landscape of open cut mine and dams.	Levelled to slopes of <5%. Local relief <30 m.	N/A	Original soil has been removed, greatly disturbed or buried. Soil has been disturbed to depths >100 cm.	Considering previous disturbance, the probability of cultural material is negligible.

Table 3.1 Soil landscapes of the project area

Soil landscape and type	Landform pattern and hydrology	Landform elements	Slope and relief	Geology	Soil summary	Implications for archaeology
Kalbili (variant B)	Long (<300 m) waning footslopes on piedmont deposits.	Wide and low rolling hills and gullies.	Slopes <20% Local relief 30–90 m	Piedmont material of gravel, sand and silt. Rock outcrops generally absent.	Shallow (<60 cm), moderately well-drained Earthy Sands/Loams on upper slopes. Moderately deep to deep, poorly drained Yellow Pozolic Soils and Solodic Soils on lower slopes.	Potential for relatively deep deposits, surface and/or buried cultural material may be present.

3.5.1 Geotechnical investigations

Preliminary geotechnical investigations of the project area have been undertaken to inform the development designs (Golder 2021). The program included the drilling of three boreholes to a maximum depth of approximately 19 m below ground surface within the proposed ARC footprint.

Geotechnical investigations found a thin layer of fill, associated with existing site works, over a silty clay residual B2 horizon over weathered bedrock comprising variations of siltstone, mudstone, and dolerite. No soil profile that might constitute an A1 horizon was identified (ie where cultural material might be expected to occur if present). The study indicates that the A1 horizon has been removed through historic disturbance in the development footprint.

Table 3.2 Interpreted soil units based on geotechnical data (from Golder 2021). Notes included some core loss which has not been included here.

Borehole Number	Depth (m)	Interpretation
ARC – BH1	0 – 0 .7	FILL: Gravelly clayey silt.
	0.7 – 1.50	RESIDUAL B HORIZON: Pale orange brown and grey clayey silt, low to medium plasticity clay, trace fine grain gravel, trace fine grained sand.
	1.50 – 4.50	RESIDUAL B HORIZON: Pale grey and brown fine grained sand, trace fine grained gravel, inferred extremely weathered siltstone, trace iron staining; increase in fine grain sand at 4.5 m.
	4.50 – 7.25	WEATHERED BEDROCK: Dark red altered siltstone , visible silicate mineral grains, iron indurated; transition to massive at 5.95 m; grading to orange brown and dark red, extremely weathered, iron stained at 6.5 m.
	7.25 – 11.11	WEATHERED BEDROCK: Pale brown siltstone, extremely weathered, iron stained; grading to grey brown and orange brown at 9.1 m; pale variant at 9.9 m with pale grey clayey bands and quartz gravel inclusions.
	11.11 – 16.23	BEDROCK: Dark grey green and pale brown, massive, with pale brown silty bans and quartz gravel inclusions, inferred extremely weathered sill

Table 3.2 Interpreted soil units based on geotechnical data (from Golder 2021). Notes included some core loss which has not been included here.

Borehole Number	Depth (m)	Interpretation
ARC – BH2	0 – 1.10	FILL: Sandy silty gravel.
	1.10 – 8.90	WEATHERED ROCK: Orange brown mottled pale grey weather siltstone, iron stained, moderately cemented with fine to medium grained ironstone gravel; transitioning to pale grey variant at 1.3 m.
	8.90 – 13.65	BEDROCK: Pale grey to grey siltstone, dark grey siltstone bedding, trace iron staining; pale grey white (baked?) siltstone at 11.58 – 11.67 m and 12.42 – 12.50 m.
	13.65 – 16.15	BEDROCK: Yellow brown and dark red interbedded altered siltstone and mudstone, dark grey siltstone laminations, iron indurated.
ARC – BH3	0 – 0.3	FILL: Gravelly clayey silt.
	0.3 – 1.00	RESIDUAL B HORIZON: Grey brown gravelly silt, trace low plasticity clay.
	1.00 – 2.65	WEATHERED ROCK: Dark grey to grey weathered siltstone, trace iron staining and iron induration.
	2.65 – 19.15	BEDROCK: Dark grey to brown grey siltsone, with various banding, iron staining and iron induration.

3.6 Hydrology

The project area is situated in the headwaters of both the Lake George and Wollondilly River catchment via Allianoyonyiga Creek to the west, and the Mulwaree River catchment via Crisps Creek to the east. The Great Dividing Range separates the catchments. Other prominent water features include the ephemeral Lake George approximately 8 km to the west and Lake Bathurst approximately 9 km to the north-east.

Lake George (*Weereewa* or *Ngara*) is extremely large (25 km x 10 km) and extremely shallow. It was formed 5 million years ago when major movement along a fault line caused an uplift and created a natural dam (endorheic basin). The lake's depth when full ranges from 1.5 – 4.5 m. Sediments beneath the lake show at least eight alternating layers of full and dry conditions over the past 750,000 years (Cartoscope nd). Similarly, Lake Bathurst (*Bundong*) is a smaller (3 km x 1.5 km) endorheric basin. Interestingly, aeolian features (eg lunettes, crescentic dunes) on the eastern side of Lake Bathurst indicate strong westerly winds, and climates with no counterpart in present day Australia (Flood 1973, p. 19).

The headwaters of a number of ephemeral waterways, largely first order, are mapped to the north of Collector Road, north of the development footprint (approximately 100 m at the closest point). However, established creek corridors are not visible on current aerial photography, and are probably ephemeral. Alternatively, these may reflect erosion scours as a result of recent de-vegetation. In either case, they would not be suitable for prolonged or long term occupation in the past. Similar conditions exist to a range of minor tributaries in the east, some of which appear to be under existing structures.

The nearest established watercourse to the development footprint is Crisps Creek, which is located approximately 300 m north-east of the development footprint, and a third order tributary to Crisps Creek which runs west to east approximately 250 m north of the ARC.

3.7 Flora and fauna

In the Lake George basin, a sand and gravel spit formed when the lake was about three times deeper than at present, and was dated by Galloway (1967:477) to approximately 15,000 years ago (ie late Pleistocene). This was interpreted as most probably denoting a period of reduced evaporation associated with temperatures of the order of 11°C lower in winter and 8°C lower in summer. This finding coincides with research undertaken by Costin (1973) in the Black Mountains, and suggests an actual mean summer temperature of 9-10°C. Such low temperatures would have imposed tree-line conditions and, along with other evidence, suggests that Lake George and most of the Southern Tablelands would have been more steppe-like. With the exception of occasional Snow Gums, there would have been limited vegetation or fauna with which to establish long term of extensive occupation (Flood 1973, p. 20). Flood (1973, p. 21) concludes, "Man could have crossed the tablelands at this time [during the late Pleistocene], but it is most unlikely that there was any even seasonal occupation, except perhaps in low deep valleys on the fringes of the highlands."

Temperatures and vegetation rose to those similar to today by around 10,000 years ago, with a colder anomaly between 3,000 and 1,500 years ago reducing temperatures to 3°C, probably colder to present day. As described by Flood (1973, p. 23): "Such conditions might have discouraged Aboriginal occupation of the Southern Uplands, although the temperature regime would certainly not have been too harsh for man to live all the year round in any of the region below the winter snow-line for the whole of the last 10,000 years."

Prior to European settlement in the region, swans and other water fowl nested on the rocky isles in Lake Bathurst (Govett 1977 [1836-7], pp. 22-23 in AMBS 2012, p. 14). Animals in the area that would have been used by Aboriginal people as food resources included kangaroos and wallabies, possums and other small marsupials (such as bandicoots), emu, wild turkey, echidna, native ducks, fish and eels, freshwater mussels, snakes, native bees and ants (AMBS 2012, p.14). Significantly, the Ngunawal people, the traditional owners of the land on which the project area is situated, were among the Aboriginal groups that travelled to the south-eastern highlands to hunt Bogong moths (*Agrotis infusa*) in summer (Flood 1973; AMBS 2012). This event is discussed further in Section 4.2.2.

From the 1820s onwards, farms and cultivation were established over what was once open forest, disrupting the traditional ways of life (NPWS 2003:206 in AMBS 2012, p. 15).

Today, there are small areas of regrowth in the north-eastern portion of the project area. Other areas of the project area are subject to rehabilitation of former mining and related areas. The most abundant vegetation community within the project area is derived grasslands, including a variety of native pasture grasses and exotic species disturbed from historical agriculture and extractive industry land uses. Patches of fragmented vegetation within the Eco Precinct also contain shrubs and small trees. No remnant vegetation has been identified in the project area.

3.8 Land use and disturbance

A detailed review of the history of the locale is provided in EMM's (2021) historical heritage assessment developed for the project. A summary of the findings is provided below. Historical aerial imagery for the project area has also been obtained and is presented in Annexure C.

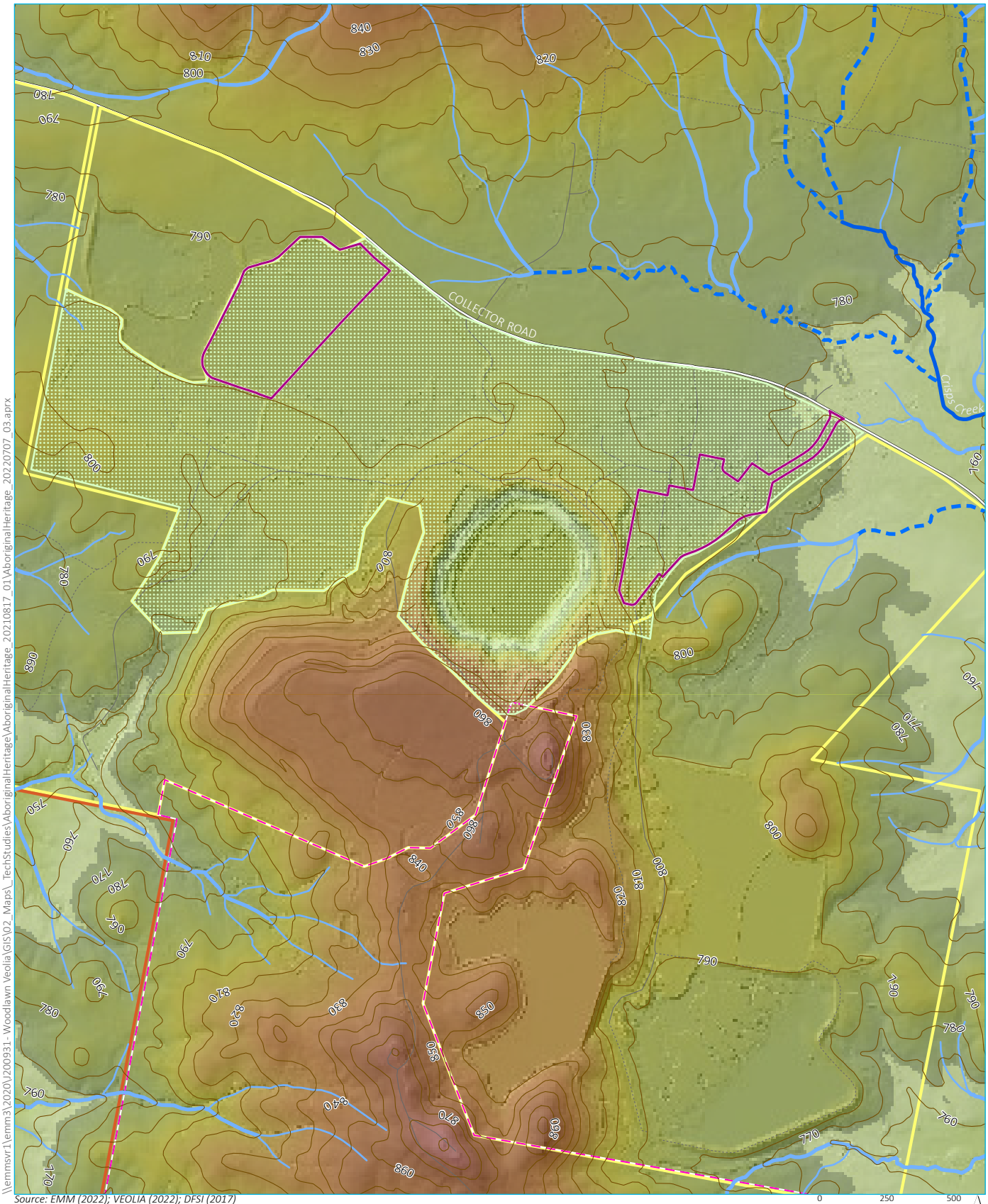
Following initial explorations at the turn of the 18th Century by explorers such as Henry Hacking (c. 1798) and Hamilton Hume (c. 1814), the project area and surrounds were primarily used for pastoral purposes, most likely the grazing of sheep for wool production. Squatting and establishment of these pastoral activities was well underway by the 1830s. By the 1830s, much of the project area was encompassed within these pastoral leases, and this pastoral use of the land would continue well into the 19th century.

Generally, more intensive activity during this period appears to have centred closer to Lake George, with the primary disturbances to the project area in this period being complete de-vegetation (see 1960 aerial; the small cluster of trees present in the south are removed by 1985) and minor residential development and associated services (see two small buildings on 1967 aerial). Such de-vegetation of the region is highly likely to have resulted in soil destabilisation and the formation of minor tributaries or erosion scours, some of which are noted in the Section 3.6.

In 1978, the majority of the project area was heavily disturbed by open cut mining operations. This development constitutes a major impact to the project area, with extensive earthwork activities across the site for levelling, extracting, and rehabilitation. Visual observations outlined in Section 6 suggest that the area of the general ARC footprint may have lost >2 m to establish the flat platform currently present. Information from Veolia advises that the ARC footprint t was part of the processing plant for the mine, and until the Eco Precinct retained numerous industrial buildings, since demolished and removed. It must also be highlighted that this location is only 50 m from the extensive void that now forms the main bioreactor landfill for the Eco Precinct, and would have formed a central location for any mining activities. As part of these mining works, numerous evaporation and tailings dams and reservoirs were established across the site, and which extend several metres into the original soil profiles. The proposed encapsulation cell site is within one of these major evaporation dams.

The Eco Precinct was constructed on the site commencing in 2000 and has operated since 2004. This has required the establishment of tracks, structures, power and other services associated with operation of the facility. These have all resulted in various ground disturbance across the development footprint that have adversely affected the soil profile. Veolia continues to manage, operate, and develop the project area for waste management purposes. Following approval in 2013, mining was undertaken by Heron Resources. Heron Resources went into voluntary administration in July 2021.

Overall, there appear to be no areas of the project area that are unaffected by agriculture, post-contact settlement, and more recent activities. While the earlier activities may have only superficially impacted the natural environment, and importantly the upper soil profile within which cultural materials may be present, the last 50 years of activity have seen significant earthworks within the development footprint. Across the majority of the development footprint, such impacts have removed at least the top metre of the upper soil profile, and which may extend >2 m in several locations. Based on these findings, it is considered that no part of the development footprint retains an intact natural soil profile.



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Source: EMM (2022); VEOLIA (2022); DFSI (2017)

0 250 500 m
GDA 1994 MGA Zone 55

N

KEY

- Development footprint
- Veolia integrated waste management operations
- Woodlawn Eco Precinct
- Woodlawn Mine operations area
- Woodlawn Wind Farm
- Major road
- Minor road
- Vehicular track
- Contour (10 m interval m AHD)

Strahler stream order

- 1st order
- 2nd order
- 3rd order
- 4th order

Elevation (m AHD)

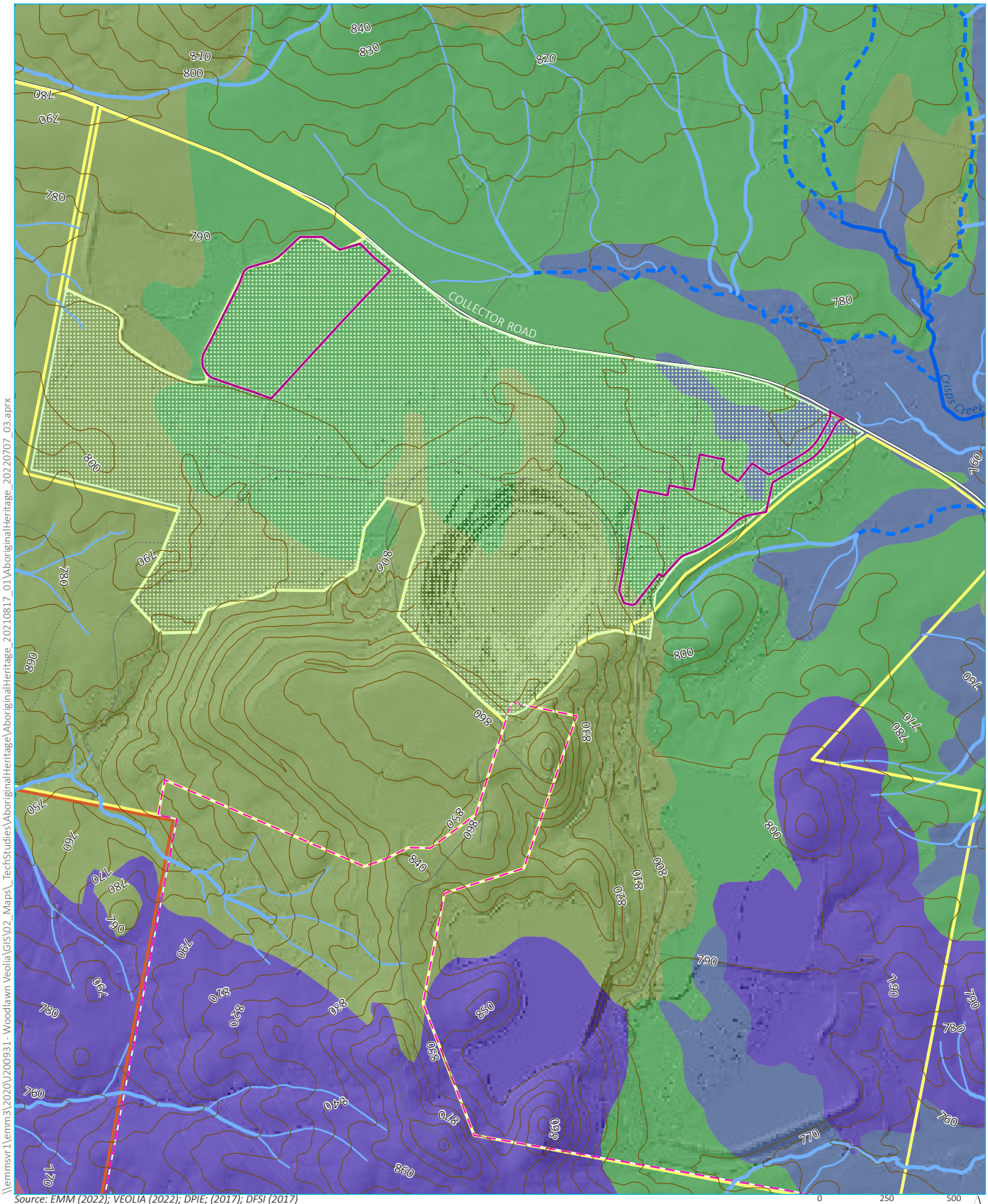
1021

566

Topography and hydrology

Woodlawn Advanced Energy Recovery Centre
Aboriginal cultural heritage assessment
Figure 3.1

EMM
creating opportunities



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Source: EMM (2022); VEOLIA (2022); DPIE; (2017); DFSI (2017)

0 250 500 m
GDA 1994 MGA Zone 55

N

KEY

- Development footprint
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- Woodlawn Eco Precinct
- Woodlawn Mine operations area
- Woodlawn Wind Farm
- Major road
- Minor road
- Vehicular track
- Contour (10 m interval m AHD)

Strahler stream order

- 1st order
- 2nd order
- 3rd order
- 4th order

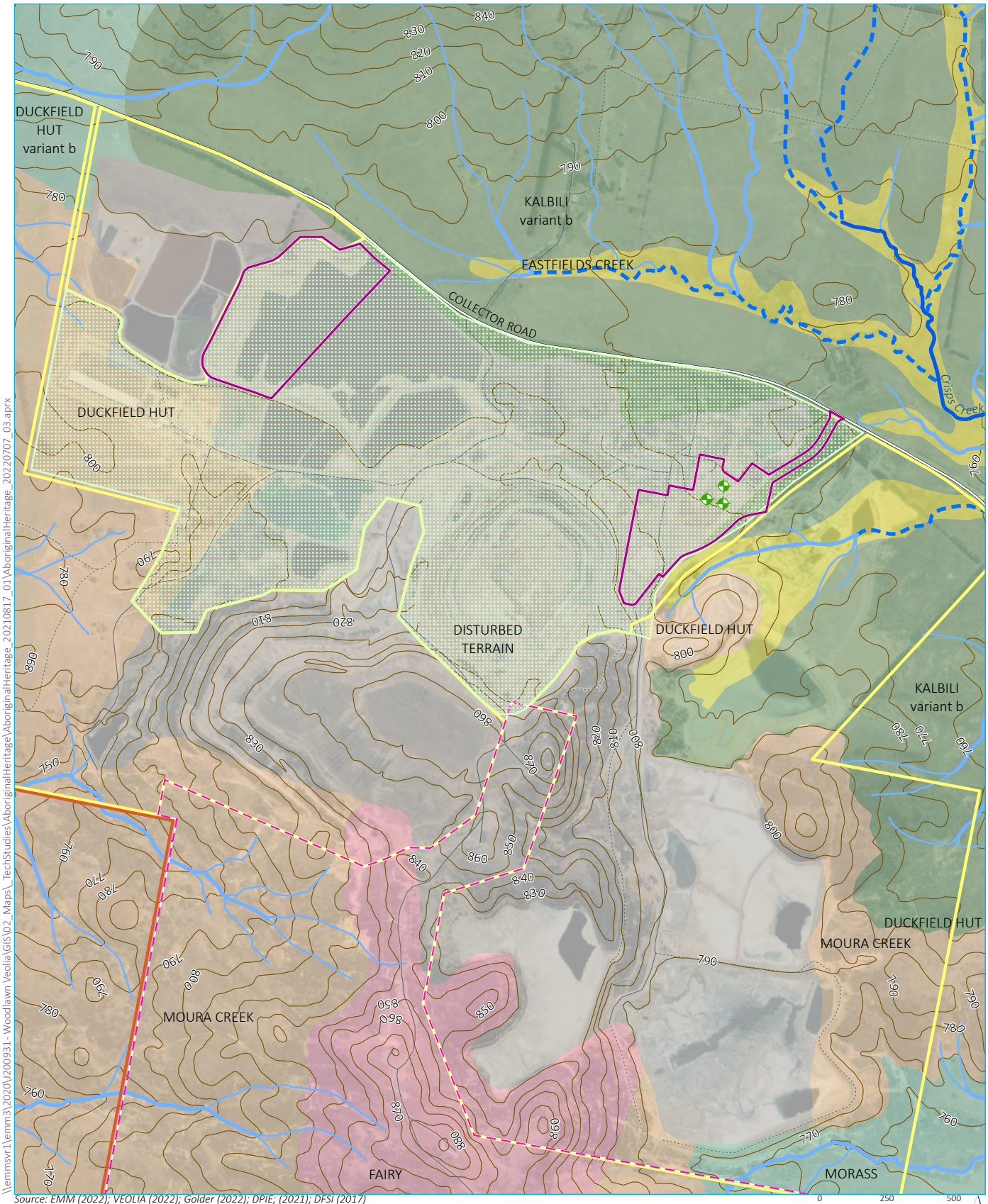
Geological period

- Devonian
- Ordovician
- Quaternary
- Silurian
- Tertiary

Geology

Woodlawn Advanced Energy Recovery Centre
Aboriginal cultural heritage assessment
Figure 3.2

EMM
creating opportunities



KEY

- Development footprint
- Veolia integrated waste management operations
- Woodlawn Eco Precinct
- Woodlawn Mine operations area
- Woodlawn Wind Farm
- Major road
- Minor road
- Vehicular track
- Contour (10 m interval m AHD)

Strahler stream order

- 1st order
- 2nd order
- 3rd order
- 4th order

- Geotechnical borehole (Golder 2021)

Soil landscapes

- Alluvial
- Colluvial
- Disturbed terrain
- Residual
- Transferral
- Vestigial

Soil landscapes

Woodlawn Advanced Energy Recovery Centre
Aboriginal cultural heritage assessment
Figure 3.3

EMM
creating opportunities

4 Ethno-historical context

4.1 Key findings

- Aboriginal people of the project area spoke the *Ngunawal* language, whose territory extended from Queanbeyan to Yass, Tumut to Boorowa and east to beyond Goulburn on highlands west of the Shoalhaven River. The project area appears to be on a boundary, and may also have associations with the *Gundungurra* language group to the north, *Yuin* language to the east, and *Ngarigo* language to the south. Reports indicate that at the initial time of white settlement in the Canberra region, the Aboriginal population was estimated between 400 and 500 people, however this would fall to 45 by 1848.

- Lake George and the surrounding ridgeline were central places of high importance for the *Ngunawal* and their neighbours. Lake George is recognised in previous studies as a meeting place of spiritual importance and an important stop on a major travelling route stretching from Yass in the west to Gundaroo and Lake George, and from thence to Queanbeyan and onwards eventually to the east coast.

- However, while historical information provides several observations in relation to the early nineteenth century Aboriginal society, in particular at nearby Goulburn and Lake George, no site-specific areas of activity were identified. No sites of cultural value, nor association with nearby Lake George, were established within the project area during the Aboriginal consultation for this project.

4.2 Regional information

Information about the socio-cultural structure of Aboriginal society prior to European contact largely comes from ethno-historical accounts made by colonial settlers. These accounts and observations were often made after significant social disruption due to disease and displacement. As a result, this information is often contentious, particularly in relation to language group boundaries. Therefore, it is likely that language group boundaries were far more diffuse than the arbitrary demarcations drawn by colonial observers.

The project area is on *Ngunawal* land. Tindale (1974) describes the land of the *Ngunawal* as extending from Queanbeyan to Yass, Tumut to Boorowa and east to beyond Goulburn on highlands west of the Shoalhaven River. Mathews (1904, p. 294) marks Lake George and Goodridge as the southernmost boundary of the *Ngunawal*. However, the project area appears to be on a border of this boundary, and may also have associations with the *Gundungurra* language group to the north, *Yuin* language to the east, and *Ngarigo* language to the south. It is important to remember that these groupings represent an account of Aboriginal groups post contact, they may not necessarily present an accurate picture of the way lands were occupied or used in the past. Jackson-Nakano suggested that Tindale's tribal boundaries incorporated a number of distinct Aboriginal communities with their own dialects, who were probably linked by kinship networks, common belief systems, ceremonies, and customs (Jackson-Nakano 2001 in AMBS 2012, p. 12). MacAlister recorded that there were three fairly numerous tribes in the district; the Cookmai or Mulwarrie (Mulwaree), the Tarlo, and the Burra Burra (MacAlister 1907:82, in AMBS, p. 12). Blanket distribution lists from this period connect the 'Mulwaree tribe' with the Tarlo, Wollondilly and Lake Bathurst areas, to the west of the project area (Jackson-Nakano 2001:13, in AMBS, p. 12).

William Wright reported that at the initial time of white settlement in the Canberra region, the Aboriginal population was estimated between 400 and 500 people (Dibden 2012, p. 24). Generally, Aboriginal people lived in family based clan groups of between 30 and 50 people (20 to 30 according to Dibden [2012, p. 24]) in a defined area. Each group would have been mobile for at least part of the year and comprised of various ages males and females with approximately four to eight pairs of husband and wives. Most men were considered to have only one wife; although Govett (1836) notes that the chiefs of each tribe were able to have two wives.

Historical records have noted large gatherings of people took place in Goulburn in the early 1800s (Smith 1992), although on several early expeditions 'not a single Aborigine was encountered' (Flood 1973, p. 41). At times, the only recorded signs that the country was inhabited were 'the fires from the natives who appeared numerous', in one notable instance by Joseph Wild (d. 1837) in August 1820, who witnessed fires from the hills to the northeast of Lake George in the early 1800s (cited in Flood 1973, p. 41).

Flood (1973, p. 44-45) notes a general paucity of reports of sightings of Aboriginal people in the region by early itinerant visitors. While she accepts disease and displacement may have played a significant role in the perceived 'disappearance' of Aboriginal people from the Southern Tablelands, she also notes that population reports are often contradictory in the 1800s. She suggests the following explanations for this discrepancy (Flood 1973, p. 44-45):

- Aboriginal people in the region were generally dispersed, mobile and in small numbers, making it difficult to gauge numbers;
- they kept to the rivers and woods where food resources were more plentiful, whereas the explorers tended to follow the open plains because of the easier passage they afforded to horses and drays;
- the European explorers and visitors in this area did not generally have Aboriginal guides, who might have made contact with the local Aborigines; and,
- the 'Canberra tribe', estimated at 500 strong by several local settlers and likely a clan or sub-division of the *Ngunawal*, probably only came together on certain occasions such as corroborees and intertribal battles.

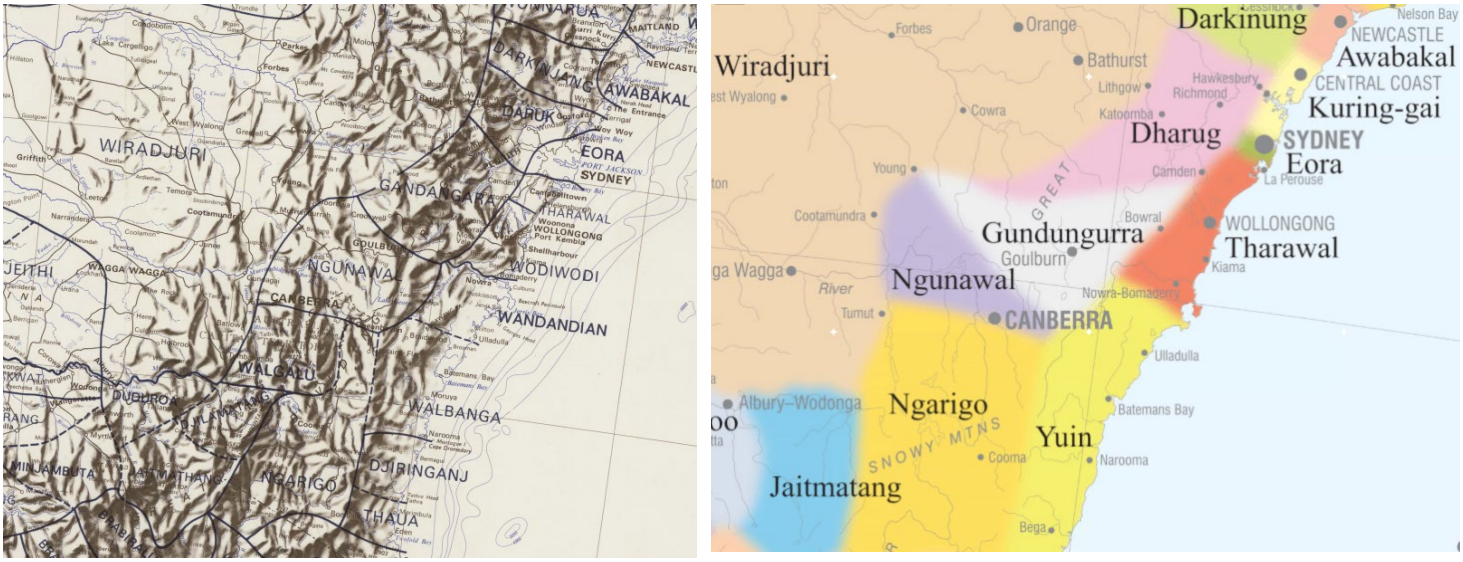


Plate 4.1 **Left: detail from Tindale's map (1974) showing the location of the *Ngunawal.* Right: Detail from The AIATSIS map of Indigenous Australia**

4.2.1 Local beliefs and ceremonial practices

Lake George, located approximately 8 km east of the project area, is also known to have been a meeting place of spiritual importance to many of the Aboriginal groups in the region (AMBS 2012, p. 13; Rosen 2018, p.15). It is reportedly the site of conflict between the *Ngunnawal* and *Wiradjuri* (R. Bell pers comm 2011 in AMBS 2012, p.30). Dibden (2012, p.25) notes that the Ngunawal word for Lake George is *Ngungara* (or *Weereewa* in other sources): 'it is from *Ngungara* that the Ngunawal creator being *Nadyund Bouruage* originates' (Don Bell in Gugler 2010, cited in Dibden 2012, p. 25). As such, Lake George and the surrounding ridgeline were central places of importance for the *Ngunawal* and their neighbours.

William Govett's notes and sketches taken during a surveying expedition in NSW and the Blue Mountains roads, on staff of Surveyor-General Major Mitchell from 1830, makes these observations about a corrobboree at nearby Lake George:

> Corrobory – or a particular dance of the natives.
>
> I was once present and witnessed this most extraordinary dance of the Blacks which took place near Lake George called by the natives "Weriwa"- I understand this ceremony only takes place upon the friendly meeting of two tribes after a fight or dispute, to celebrate the cessation of hostilities. On this occasion there were a hundred and eighty collected together, men, women and children, and the place chosen very suited to the purpose being a small open spot, clear of timber, but surrounded on all sides by the darkness of the forest. The Men only of the visiting tribe were the spectators, and they seated themselves wrapt in their opossum cloaks round in a semicircular form. The oldest of them being nearest each end of the semicircle – Immediately before them bright fires of dried bark were kept burning by boys who constantly supplied the fuel and again behind the fires was the stage or place of action. The whole ceremony indeed in the arrangement very much resembled a Theatre. The women however were altogether concealed from view, but so situated, that their yells, and horrid noises made by the clashing of sticks, and whirling in the air pieces of wood fastened to a string, could not only be distinctly heard, but added much to the wild effect and savage strangeness of this nocturnal revel.
>
> The men or actors besmear themselves with white paint and appear like skeletons, and they caper in various forms and attitudes round the fire, grinning, roaring hissing (Govett 1830-1835).

From a purely ecological perspective, Lake George and Lake Bathurst were home to numerous plant and animal species. During his first visit to Lake Bathurst in 1820, Governor Macquarie remarked upon the 'innumerable flocks of wild ducks and a great many black swans' covering the surface of the water (Flood 1980, p.98), and emus and kangaroos were found to be abundant around Lake George (Cunningham 1824 in Flood 1980, p. 94). The quartz-rich sand dunes of Lake George are also noted to have been an attractive resource for Aboriginal people (Flood 1980, p.160).

As a result of both the resource rich environment and the spiritual importance, Dibden (2012, p. 25) suggests Lake George was a central focus of activity for the *Ngunawal*. Archaeologically, this is evident in the number of site complexes located nearby (see Section 5). This importance applies not only to the areas fringing the lake but also the prominent ridgeline immediately to the west of the lake which has an abundance of stone artefacts distributed across it (Wally Bell Oct. 2010 pers. comm. to Dibden 2012, p.25).

Indeed, the lake was an important stop on a major travelling route stretching from Yass in the west to Gundaroo and Lake George, and from thence to Queanbeyan and onwards eventually to the east coast (Wally Bell Oct. 2010 pers. comm. to Dibden 2012, p.25). The project area may lie outside this travel corridor, which appears to be more to the south, though likely was travelled through on occasion, albeit less extensively. Such transient use may have resulted in the discard of stone artefacts in very low densities across the landscape.

4.2.2 Diet and subsistence

Hydrological knowledge was an important factor in the success of Aboriginal occupation of the Australian continent, and rivers, lakes and other bodies of water remain integral to the lives of contemporary Aboriginal groups. Not only is water itself a crucial substance for human survival, but lakes, rivers and wetlands feature a diverse array of attendant floral and faunal resources. These natural resources were exploited by Aboriginal people to support a rich social, economic and ceremonial life; as Jackson et al. (2012, p.58) note, the importance of water to Aboriginal people is reflected in their nuanced and complex structures of knowledge surrounding water systems and related environmental factors. Although no significant bodies of water are located in the immediate vicinity of the project area, the importance of Lake George and Lake Bathurst to past and contemporary Aboriginal people has been well documented.

There is evidence of the construction of covered sleeping areas known as gunyahs- shelters made of bark or bushes laid against supporting trees or poles (Govett 1836, p.19). Louisa Atkinson, botanist, journalist and fiction author, writing in 1863 of her life in the Southern Highlands in the 1830s and 1840s describes the appearance and construction techniques of gunyas:

> Their dwellings were of a description most readily constructed, soon dilapidated, and forsaken without regret. Sometimes a sheet of bark supported on end in an inclined position by a small pole, at others, a few branches place round a triangle, formed by partially severing a sapling so as to bend both ends to the ground, and supported in the middle by a sloping forked stick, were the materials almost always employed; but occasionally these were rendered more comfortable, and impervious to wind and rain, by being built over with grass (Lawson 1989, p. 46).

This description while saturated with values is very different to those of the original inhabitants, accords with early photographs and drawings of gunyahs. Timber and bark were also used to make tools and weapons adhered with resin from plants. Local and imported stones including quartz and silcrete were used to make a variety of tools.

Edible plants and vegetables were plentiful in the South Eastern Highlands bioregion and likely were collected seasonally. For example, yam daisy tubers were available in spring, summer and autumn and wattleseeds in winter. Orchid tubers were collected in late winter and early spring. Fish and crayfish were caught from the rivers from September to May while animals such as possums, kangaroos and wallabies were hunted year round.

In December and January every year, Aboriginal groups in the region travelled to the Bogong Mountains and Snowy Mountains where men took part in feasts of roasted bogong moths that took place high on the rocky granite outcrops of the mountains (NSW NPWS 2003). Moths were a summer staple for all those Aboriginal people whose territories included major moth aestivation sites, namely the *Walgalu* of the upper Tumut, the *Ngarigo* of Monaro, the *Djilamatang* of the upper Murray, the *Jaimathang* of Omeo, and the *Minjambuta* of Mount Buffalo (Flood 1973, p. 118). It is certain that the *Ngunawal* of the Southern Tablelands participated as well, probably both at the gatherings on the Snowy Mountains and on the Bogong Range, Tumut (Flood 1973, p. 119). The feasts incited the migration of groups and coincided with important ceremonial and intermingling of Aboriginal tribes in the region. Indeed, European observations in the 1860s suggest the coastal tribes of southern NSW participated in the Bogong moth feasts; before this period, evidence suggests they were on unfriendly terms with the people of the coastal hinterlands and Southern Tablelands (Flood 1973, p. 119-120). Flood (1973, 1980) identified a link between the habitat sites of the bogong moth and archaeological evidence within the Canberra region, highlighting the importance of this resource to Aboriginal people in the region.

A number of other resources are identified by Flood (1973, pp. 92-116) such as kangaroo and possum skins that were used for cloaks and covering as well as wrapping tools for travel. Wood was used to create many tools including canoes, spears, boomerangs, clubs and containers, and as described in this extract, as clapping sticks. The extract also makes note of the white ochre used for body decoration. The bark of stringy bark trees was used for making shelters and rope. Hearths were constructed using wood and stone to provide warmth and for cooking (AMBS 2012).

The category of tools which survives best for archaeological investigation are made of stone. These were widely used in axes and spears, as grinding and cooking implements. The geology of the region provided stone for tool manufacture including quartz pebbles and, silcrete cobbles eroding from some creeks. Material may have also been imported from the surrounding region through trade, such as the axe quarry at Millpost (see Section 4.2).

4.3 Contact and post contact overview

Earliest European exploration of the Goulburn Mulwaree area occurred in 1798 when Henry Hacking, with an escort of at least three, searched the area near present day Goulburn (Rosen 2018). The area was re-explored in 1814 by Hamilton Hume and in 1820 Governor Macquarie proclaimed Goulburn, with exploration and settlement fanning out across the surrounding area under official and unofficial guises (Rosen 2018, p.22). Tarago, the closest village was established in 1827, initially known as Sherwin's Flat after William Sherwin, the original grant owner. When the railway line was opened through the town the name was changed to the present day Tarago (Rosen & Associates 2018, p. 91).

In 1798, a party of three led by John Wilson undertook an expedition of the southern tablelands. They reached Mount Towrang near Goulburn and reported that "we really believe that there was never a native in this part of the country" (Flood 1980, p. 30 in AMBS 2012, p.13). However, a couple of decades later, Joseph Wild recorded seeing "the Fires of Natives who appear numerous" from his hilltop vantage point north-east of Lake George (Flood 1980, p.35 in AMBS 2012, p.13).

Epidemics, including smallpox (c. 1789, 1829-30, 1860s), influenza (c. 1846-7) and, later, measles, took their toll on the local Aboriginal population. In the early 1830s, George Bennett, a surgeon travelling through the area, reported several Aboriginal people on the Gundary Plains with smallpox scars (Bennett 1967 [1834], p. 148 in AMBS 2012, p. 13). In 1845, another European observer reported the Aboriginal population had declined to an estimated 20-100 individuals, and by 1848, the bench of Magistrates estimated that the local Aboriginal population consisted of only 25 people (Tazewell 1991, p. 244 in AMBS 2012, p. 13). 'Queen' Nellie Hamilton, also known as 'Black Nellie', who famously bore Hamilton Hume a daughter, has been reported as the last of the *Ngunawal* people, who died in 1897. This is widely accepted as incorrect, however, as many local Aboriginal people in the region identify as *Ngunawal* today.

Many local histories cite the claim that the district was 'remarkable for being one of the few at which there was no feud between black and white races' (AMBS 2012, p. 14). However, there are a number of violent incidents recorded in the early 1800s (cf. Jackson-Nakano 2001, p. 25; Smith 1989, p.12; AMBS 2012, p. 14), including one that occurred near Lake Bathurst, approximately 9 km north east of the project area, in 1826. In this instance, Governor Darling sent a detachment of troops to the County of Argyle when two stockmen were killed at Lake Bathurst, and unusually large numbers of Aboriginal people from different tribes began to assemble at Lake George and
Inverary Park, as reported in the Sydney Gazette and NSW Advertiser (10 May 1826):

> Information having been received…that Thomas Taylor, Stock-keeper to Mr Sherwin, at Lake Bathurst, had been recently murdered by some Natives; and that these People were assembling in unusual Numbers about Lake George and in the Neighbourhood of Mr Reid [Magistrate for County of Argyle] at Inverary Park; a Detachment of Troops was ordered to proceed into Argyle the following Morning…
>
> The Governor is concerned to think, from the Reports He has received that the Proceedings of the Natives are the Effect of Resentment at the Outrages committed upon them by Stock-keepers who interfere with their Women, and by such and other Acts of Aggression, provoke them to retaliate.

An 1836 watercolour portrays an Aboriginal man named Cullabaa, described as 'native of Lake George' but also associated with the Five Islands Tribe, which is associated with Wollongong. The image shows Cullabaa wearing a European jacket and waistcoat with a pair of trousers, and holding what is perhaps a wooden stick in his right hand.



Plate 4.2 **A series of twelve profile portraits of the Aborigines of New South Wales/Cullabaa, native of Lake George, Five Islands tribe, c. 1836 by W. H. Fernyhough, National Library of Australia**

4.4 Information provided by RAPs

No additional ethnographic information was provided by RAPs during the review period for this ACHA.

5 Archaeological context

5.1 Key findings

- The region has been subject to both academic and more recent cultural heritage management investigations. The latter dominated by the establishment of numerous wind farms around Lake George. These studies suggest that the region was visited and/or occupied by Aboriginal people for >20,000 years, although the vast majority of cultural deposits date to the last 5,000 years. These generally reflect transitory use of much of the region, with harsh climatic conditions generally limiting longer term occupation.

- Previous studies demonstrate that the archaeological record of the region is dominated by isolated and/or low density stone artefacts, reflecting the transitory use of the region. These are often focussed along water courses, and on high ground with view-lines – typically in protected areas away from major wind flow. There is some potential for deeper alluvial and/or colluvial deposits to be present containing cultural materials, but investigations of these types of sites is rare – a good example being work by Amy Way on the shores of Lake George. More infrequently, culturally modified trees have also been identified.

- No previous investigations of the development footprint have been undertaken, although the nearby Woodlawn Wind Farm captured parts of the broader Eco-Precinct. This investigation identified a small number of isolated and/or very low density stone artefacts on the crests and ridgelines overlooking the project area.

- A review of Heritage NSW's AHIMS database identified 102 Aboriginal sites within 400 km^2 of the project area. These were similarly dominated by sites of varying densities of stone artefacts (89%), mostly isolated artefacts (31%), with the only other site type identified being sensitive landforms considered to be areas of potential archaeological deposit (PAD) (11%). No AHIMS sites are located within the project area, with the nearest being >1 km south.

- Since 2010, six Aboriginal Heritage Impact Permits (AHIPs) have been issued in the Goulburn-Mulwaree LGA. None encompass the project area.

5.2 Regional context

The first peopling of Australia occurred approximately 50,000 years ago (50 ka), and likely consisted of reasonably large groups of technologically advanced hunter-gatherers (Bradshaw et al. 2019; O'Connell et al. 2018). The peopling of the continent was rapid, with sites such as Devil's Lair (WA), Warratyi (SA), and Lake Mungo (NSW) all occupied within a few thousand years of arrival (Bowler et al. 2003; Hamm et al. 2016; Turney et al. 2001). Genomic research has shown that following these initial explorations of the continent, regional populations or nomadic sedentism, was established by ~40 ka (Tobler et al. 2017). These small populations were highly mobile, but remained within a broad spatial geographic area, dictated in general by the nature of resources and water availability. In the case of some of the arid parts of the continent, mobility encompassed thousands of square kms (Gould 1977), while major riverine corridors such as the Murray River had near permanent settlements (Pardoe 1995).

In NSW, the earliest evidence of Aboriginal people are human remains recovered from the lunette in Lake Mungo and dating to ~42ka (Bowler et al. 2003; O'Connell et al. 2018). The presence of red ochre covering the remains represents a society with significant cultural and symbolic complexity (Langley et al 2011). Near the coastal edge, the earliest populations were found at Cranebrook Terrace, near Penrith (western Sydney). Here a handful of rudimentary stone tools were found in an alluvial unit, some 8m below the current surface, and which were dated to ~40-45ka (Williams et al. 2017).

However, it is not until ~35ka, that regional populations appear to have become established in the Sydney Basin, and which appeared to consist of small bands of people focussed mainly along major river systems, including the Hawkesbury-Nepean River, Georges River, and Hunter River (AAJV 2020; Hughes et al. 2014; Williams et al. 2012; 2014). These rivers formed key ecological refuges that hunter-gatherer groups used to survive major climatic events such as the Last Glacial Maximum (21±3ka) – a cool and arid climatic period. Well-established archaeological models suggest populations experienced a major reduction in size (by as much as 60%), and settlement contraction and abandonment across much of the continent during this time (Veth 1993; Williams et al. 2013), although recent research suggests that the story may be more complex than this (eg Tobler et al. 2017).

The terminal Pleistocene and early Holocene (~18-8ka) was characterised by significant environmental change, notably the rapid inundation of much of the coastal shelf, resulting in the reduction of the continent by ~21% (~2 million km^2) (Williams et al. 2018), in tandem with improving climatic conditions – the Holocene climatic optimum (Williams et al. 2015a; 2015b). More broadly, these conditions resulted in increasing population growth, expansion of ranging territories, increasing sedentism (longer patch residence time) and the beginnings of low-level food production (eg aquaculture), and ultimately the initiation of social and cultural groupings observed in the late Holocene (Williams et al. 2015b). We see a much broader range of archaeological site types occurring, such as the Roonka Flat burial ground on the banks of the Murray River within which some 147 individuals were interred through the Holocene (Pate et al. 1998), and the increasing use of marine resources. Many of the previous refuges were subject to abandonment or a re-structuring of land use (Dortch 1979; Fitzsimmons et al. 2019). These activities suggest the ability to undertake large-scale movements to mitigate environmental distress was becoming increasingly difficult and was addressed through diversification of hunter-gathering behaviours and, at least in part, technological advances, and investment (Williams et al. 2015b).

The late Holocene saw significant population increase, with hunter-gatherers reaching their zenith of ~1.2 million at 0.5ka, a tenfold increase on Pleistocene levels (Williams 2013). Data suggests that the highest populations during this time were in the south-east of Australia. Williams et al. (2015b) suggest that this increase was likely a result of intensification of earlier technological advancements, including hafting-technology, plant and seed processing, and localized landscape management (using fire), allowing climatic downturns to be successfully weathered. These included strong arid El Nino Southern Oscillation (ENSO) conditions between 4-2ka, and increasingly turbulent climatic conditions during the Medieval Climatic Anomaly (1.3-1ka) (generally wetter) and Little Ice Age (0.3-0.5ka) (generally drier) (Williams et al. 2010; 2015b). A result of these denser populations was the decreased freedom of movement and the formation of strong classificatory kinship systems, complex cultural and symbolic landscapes based on geographic totemism (the 'Dreaming'), distinctive graphic art systems, land rights in the form of ritual property, and formalized exchange networks (Williams et al. 2015b).

5.3 Local context

The archaeology of the Lake George Basin and the broader Southern Tablelands, within which the project area is situated, has been subject of a number of research and cultural heritage management (CHM) assessments over the last 20 years. In particular, the influx of wind farms in the region in the last decade, and associated CHM for Aboriginal heritage has allowed archaeological research into the area to reach a point where fairly robust regional site distribution models can be prepared.

Occupational dates for the region have been generated from both archaeological sites and palynological studies. Birrigai Rock Shelter in the foothills of the Australian Alps is the oldest dated site in the vicinity of the development footprint, located ~65 km south west of the project area. Evidence from the site indicate that it was first occupied during the Late Pleistocene, c. 21,000 before present (BP) (Flood 1996 in AMBS 2012, p.12; Austral 2011, p. 26), although there has been some debate about the validity of the age (Flood 1996, p. 117 in ACT Heritage Council 2015). A handful of other late Pleistocene occupation sites have been recorded in Morton National Park, ~65 km northeast of the project area, on the edge of the Southern Tablelands. Specifically, two sites in the national park, Bulee Brook 2 and Bob's Cave, have been dated to 18,810 ± 160 BP and

10,850 ± 300 BP, a period in the late Pleistocene when the climate was cooler and drier compared to the present (Boot 1994).

Closer to the project area, at Lake George, Austral (2011, citing Flood 1991, p. 114) report tentative dates for Pleistocene occupation (17,000 – 23,000 BP) from archaeological materials in the ancient dunes abutting the lake in the vicinity of Collector, however the providence of these dates is unclear.

In addition, a palynological study of sediments in Lake George have proposed much earlier dates based on an increase in the amount of charcoal found in Lake George sediments dated from the last interglacial period (c. 128,000 – 75,000 BP) (Singh et al 1981a, 1981b). The increase in charcoal was thought to be associated with the introduction of fire-stick farming and, by proxy, the arrival of humans. Following follow up studies reassessed the dates and suggested more conservative dates of 65,000 – 54,000 BP (Wright 1986). While many others question the validity of their interpretation of the data as being human rather than climatically driven. Archaeologically, White (1994) and Flood (1999: 115) propose that an age of 60,000 years BP for Aboriginal arrival in the landscape surrounding Lake George is more likely, but this is in contrast to our broader understanding of initial peopling of the continent (Section 5.2), and is not supported by the local archaeological record to date.

However, the majority of excavated sites within Lake George basin, and indeed with in the region, date to within the last 3-5,000 years, when climatic and environmental conditions would have been similar to today. Woolshed Embankment 1 is located on the Woolshed Embankment on the northwest shoreline of the lake, and was first identified as a surface artefact scatter in the course of an assessment of the route of the then proposed Federal Highway duplication. Following excavation, and the recovery of a subsurface artefact assemblage and a number of OSL samples to date the geomorphology of the dune, occupation of the site has dated to the mid to late Holocene, between 6,000 – 2,400 years ago (Hughes et al. 2014). Another site, Nardoo, is an open camp site on the eastern side of Lake George, and has been dated to 760 ± 110 BP (AMBS 2012, p. 12). Three sites excavated on the southern edge of Lake George have also resulted in Holocene dates: Bridge Creek Junction (500 – 6,000 BP), Wrights Creek Lagoon (500 – 2,500 BP), and Bullock Camp Hill (1,000 – 5,500 BP) (Way 2018).

There are two Aboriginal places listed on the State Heritage Register (SHR) in the region. Derrawa Dhaura Aboriginal Place (also known as Gollion ochre quarry), which is situated ~30 km west of the project area on the other western side of Lake George. It was an important source of rare yellow, red and purple ochre used for body decoration, rock art, bark painting, weapon decoration, preserving animal skins and mortuary practices. Ochre would have been exchanged and traded during the large intertribal gatherings of Aboriginal groups that passed through the area for events such as the feasting of the Bogong moths (SHR 5066529). Millpost axe quarry, south of Lake George, and ~40 km south of project area is a basalt (dolerite) source which provided stone used to make axe heads. It was a trading commodity for neighbouring Aboriginal groups in southeastern Australia (SHR 5066439). Neither ochre nor dolerite sources have not been identified as occurring within the project area or its immediate surrounds, limiting the potential for these kind of sites to occur.

An Aboriginal Heritage Study for the Goulburn Mulwaree Local Government Area identifies places of significance and provides recommendations for their management and conservation (AMBS 2012). Lake George itself is classified as an area of Aboriginal heritage sensitivity, and is noted as a meeting place for Aboriginal people and an area with spiritual value. The project area falls at least partly within an area demarcated for 'potential Aboriginal artefacts', as mapped in this study (AMBS 2012 Figure 6.4). This specific data is sourced from the Goulburn Mulwaree DCP (2006), where the layer is named as of 'Places of Aboriginal significance'. The reasoning behind this designation is unclear but may be related to the general proximity to Lake George and/or through their mapping of a range of minor watercourses near the site. The report found that previously recorded Aboriginal sites within the Goulburn Mulwaree LGA generally occur in the vicinity of watercourses, in elevated areas, and in areas with suitable geology or mature vegetation (AMBS 2012, p.26). As outlined in Section 3, none of these criteria apply to the project area.

Other local archaeological studies have been undertaken in relation to development, predominantly associated with proposed wind farms on grassy pastural lands where the surface visibility is often quite low. On exposures where Aboriginal stone artefacts were identified, the densities were generally quite low. However, these surveys have also demonstrated that artefacts are present across the landscape, and this has often been interpreted as representative of transient occupation of the local area.

Below is a synthesis of a number of nearby studies that more accurately reflect the likely cultural materials within the project area. The locations of these studies in relation to the project area is shown in Figure 5.1.

Study:	Jupiter Wind Farm
Reference:	ERM (2016)
Distance from project area:	12 km south east

This ACHA, and associated survey, was undertaken in advance of works relating to the proposed construction of the Jupiter Wind Farm. This proposed development was abandoned in 2018 following community opposition. The development was determined to be State Significant Development (SSD), and therefore the assessment aligned with a set of SEARs.

Set within a landscape of rolling hills dissected by valley depressions, the environmental and archaeological background research determined the topography, geology, flora and fauna present would have provided a suitable locale for Aboriginal occupation, both transient and/or more long term. Within this setting, the Shoalhaven River and associated landscapes would have been a primary focus for Aboriginal subsistence activities, along with tributaries including Reedy Creek and Boro Creek. Sites were predicted to occur on gently sloping or flat landforms adjacent to these waterways. Sites in hilly landforms, crests or ridges, were considered more probably to reflect more transient activity through the landscape. Locales where longer term occupation was considered included sheltered environments (eg rockshelters) and/or when providing good views. Quartz, chert and silcrete were identified as the primary raw materials for stone tool manufacture in the region.

The survey undertaken for the assessment identified five sites, although visibility was poor. Two isolated artefacts, and one stone artefact site (two artefacts) were identified, all on slightly raised, flat to gently sloping landforms adjacent to ephemeral creeks. Silcrete (with variations in colour) was the only raw material identified at these sites. In addition, two areas of moderate archaeological potential were identified on flat to gently sloping terrain adjacent to Manar Creek and Spring Creek. These areas were deemed to be archaeologically sensitive because of findings on similar landforms in the surrounding region.

Ultimately, the artefact sites were all determined to be of low significance, and the potential archaeological deposits (PADs) were determined to be of moderate significance and requiring further investigation. Where impact could not be avoided, mitigation measures of collection for the artefact sites, and subsurface testing of the PADs was recommended.

Study:	Collector Wind Farm
Reference:	Dibden (2012)
Distance from project area:	12 km south east

This ACHA and associated survey, was undertaken in advance of works relating to the proposed construction of the Collector Wind Farm, located ~4 km northwest of Collector. The development was defined as a Major Project (Critical Infrastructure) under Part 3A of the *Environmental Planning and Assessment Act 1979*.

The environmental and archaeological background research determined the majority of the proposed impacts were to be made in areas located on an undulating plain, with little reliable or abundant sources of water. The assessment considered that the lack of resources, such as water, limited past use to transient use. The nearby Lachlan River to the north and Lake George to the south were determined to have been much more attractive areas for more frequent and/or sustained occupation.

Five locales with Aboriginal stone artefacts were recorded during survey. They comprised two isolated artefacts, and three very low density (0.04/m^2 - 0.12/m^2) artefact sites. A number of raw materials were identified, including chert, silcrete, milky quartz, and a fine-grained volcanic material. The vast majority of artefacts were recorded on crests (n=4), with one site identified on a simple slope. In addition, four potential culturally modified trees were identified but all were outside the area of impact; further assessment was recommended if impacts were to occur. Surface visibility was low due to high grass cover. As such, it was predicted that the artefact locales identified are likely part of very low to low density distribution across the project area.

Study:	Capital Wind Farm II
Reference:	Austral (2011)
Distance from project area:	8 km south west

This ACHA and associated survey, was undertaken in advance of works relating to the proposed construction the Capital Wind Farm II, located ~35 km east of Canberra, on the eastern bank of Lake George. The project was assessed under Part 3A of the *Environmental Planning and Assessment Act 1979*.

The environmental and archaeological background research determined that the project area was within a sensitive cultural landscape due to the proximity to Lake George, a well-established place of cultural value for the local Aboriginal community. It also retained potential for deep colluvial sediments on lower slopes, which were determined to have potential for intact archaeological deposits. Therefore, lower slopes and alluvial landforms were determined to be the most likely landforms on which sites might occur, along with ridgeline crests. Localised disturbance was considered to have impacted the site in various forms, including through agricultural activities, gully and/or sheet erosion, and the construction of sealed and unsealed roads.

As a result of the survey a total of 63 previously undocumented sites were recorded: 31 isolated finds (49.21%); 30 open artefact scatters (47.62%); and two areas of PAD. These sites were recorded on a variety of landforms, but primarily (~30%) appear to have been identified on flat to gently sloping terrain adjacent water sources. All artefact scatters identified were of a very low density (<1/m^2), and all but one was considered to have low archaeological potential. The single artefact scatter determined to be of medium archaeological potential was a low density artefact scatter (n=41, 0.001/m^2) identified on a 500 m x 80 m exposure in a ploughed field. Two areas of potential subsurface material were also identified, and assigned high archaeological potential. Raw materials identified included quartz (65.14%) followed by silcrete (30.73%), basalt (1.83%), chert (0.92%), river stone cobbles (0.92%) and mudstone (0.48%).

All artefacts and PADs avoided impact through project redesign, and no further work was recommended.

Study:	Woodlawn Wind Farm
Reference:	Biosis (2010)
Distance from project area:	5 km south-east and extending into the Eco-Precinct

This ACHA and associated survey, was undertaken in advance of works relating to the proposed construction of three additional wind turbines at Woodlawn Wind Farm.

The sparse environmental and archaeological background research determined that the study area was likely used transiently, due to the location within the Lake George Gate (a natural pass through the Great Dividing Range) and the harsh climate. Due to the perceived shallowness of the soils, little subsurface potential was predicted and artefacts, if present, were expected to be identified on the surface in areas of good visibility.

The original assessment for the Woodlawn Wind Farm development, which could not be sourced for this assessment, documented 21 artefact sites in the broader development area. These were encompassed primarily on the spine of a steep ridge of the Turallo Range (Biosis 2004 in ERM 2010, p. J10). Eight of the artefact sites were isolated artefacts, and the remaining 13 were considered a low-density of stone artefacts representative of a background scatter. Overall, Biosis calculated the ridge to retain some six artefacts per hectare (or 0.01/m^2). Artefacts were recorded on a range of landforms including slopes, and drainage depressions, with the results reporting no strong patterning of artefact location in relation to landform. The assessment determined that the range was utilised for low levels of Aboriginal exploitation and may have functioned as a transit route between larger resource zones.

Three sites were identified during survey, comprising of two low density artefact scatters and an isolated Aboriginal object. The study area was generally encompassed within cleared pastoral lands and subject to erosion. The identified sites were on saddles and below crests where they would have been more protected from major wind flows. Similarly to the initial assessment, the report interpreted the sites as representative of transient occupation of the region.

All artefacts and PADs avoided impact through project redesign, and no further work was recommended.

Study:	Gullen Range Wind Farm
Reference:	Dibden (2007)
Distance from project area:	50 km north west

This ACHA and associated survey, was undertaken in advance of works relating to the proposed construction of the Gullen Range Wind Farm, ~3 km west of Kialla. The project was assessed under Part 3A of the *Environmental Planning and Assessment Act 1979*.

The environmental and archaeological background research determined that the area is subject to high wind speeds, with little reliable or abundant sources of water. Such an environment was hypothesised as unlikely to have been a favoured area for long term Aboriginal occupation, and was determined to have been likely limited to transient activities.

All 50 of the artefact locales recorded during survey correspond to low to very low-density artefact distributions (n=195 artefacts). No convenient breakdown of the site identified was available within the report, however, it appears almost half of the sites (n=21) were isolated artefacts, and only three sites exceeded ten artefacts in total. None of these three exceeded 20 objects. Raw materials identified were primarily silcrete, quartz and chert. Given the survey conditions at the time, the results were assessed to be a reasonably accurate reflection of the archaeological potential across the study area. The report concluded that low density stone artefact scatters are a very common site type across the Goulburn and Crookwell region and afford relatively limited research potential, particularly in instances where soil deposits are shallow and/or disturbed.

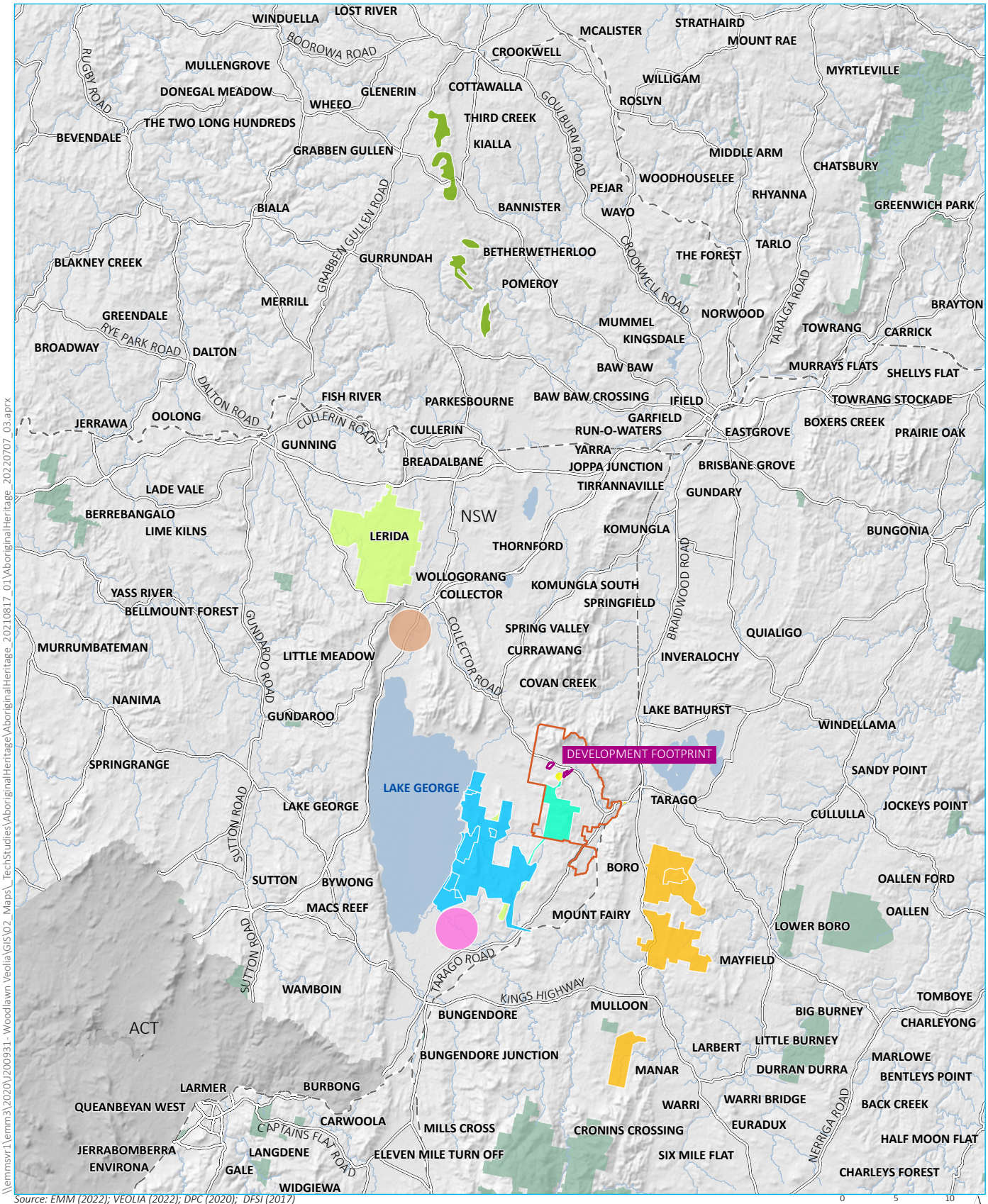
All artefacts and PADs avoided impact through project redesign, and no further work was recommended.

Study:	Proposed Woodlawn Mine Landfill/Rehabilitation Project – Cultural Heritage Assessment
Reference:	Navin Officer (1998)
Distance from project area:	Includes current project area, as well as Tarago Railway Station and Intermodal Facility (~6km south east)

This ACHA and associated survey, was undertaken as part of a broader assessment to convert the established mine site in the current waste management facility. It also included ancillary activities, including road and rail outside of the project area. The environmental and archaeological background research determined that the area was extensively disturbed by the mine operations, with soils skeletal in nature and largely limited to the spur feature to the south of the project area (adjacent south to the Woodlawn Eco Precinct, 500 m south east at the closest point to the current project area). Notably, this report cites the original EIS development for the original Woodlawn mine dating from 1971 (which could not be sourced for this assessment), and which indicated that a detailed archaeological investigation was not undertaken, nor that any Aboriginal sites or places were reported.

Four Aboriginal sites were recorded during the survey for this assessment. They were all associated with Crisps Creek, 6 km south east of the development footprint. While Crisps Creek is located near the current project area (~300 m north at the closest point), it is a lesser order – the headwaters – at this point, whereas the documented cultural material was associated with the creek as a much larger fifth order waterway. Notably, the sites all appear focussed on the confluence of Crisps Creek with Mulwaree River, another substantial water way at this point. The location of the sites, therefore, is likely associated with this important water source. The sites comprise an isolated artefact, and three low density artefact scatters, with the highest reported density being 0.35/m2. Raw materials identified were primarily quartz, with lesser amounts silcrete and chert. The artefacts were identified on alluvial terraces (n=2) and low spur slopes (n=2) landforms, both elevated locales near permanent water.

The report concludes the sites were of low significance, and recommended applying to the Director General for a Consent to Destroy permit. No further work was recommended. The sites remain valid on AHIMS (Section 5.4).



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Source: EMM (2022); VEOLIA (2022); DPC (2020); DFSI (2017)

0 5 10 km

GDA 1994 MGA Zone 55

N

KEY

- Development footprint
- Woodlawn Eco Precinct
- Rail line
- Major road
- Named watercourse
- Named waterbody
- NPWS reserve

Previous studies

- Austral 2011 (Collector Wind Farm II)
- Biosis 2004, 2010 (Woodlawn Wind Farm)
- Dibden 2007 (Gullen Range Wind Farm)
- Dibden 2012 (Collector Wind Farm)
- ERM 2016 (Jupiter Wind Farm)
- Hughes 2014 (indicative)
- Navin Officer 1998 (Woodlawn Mine Landfill/Rehabilitation Project)
- Way 2018 (indicative)

Previous studies in the local area

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Figure 5.1

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5.4 AHIMS data

The Aboriginal Heritage Information Management System (AHIMS) database is managed by Heritage NSW and includes a location and description of Aboriginal objects and sites recorded through academic research and cultural heritage management (see Appendix D.1 for further explanation of Aboriginal site features). EMM conducted a search of the AHIMS register on 2 August 2021 (ID: 609221). The search covered an area of ~400 km^2. The search identifies any Aboriginal sites or places registered within the project area; and aids predictions for the project area showing the frequency and distribution of Aboriginal site types in the broader landscape. A copy of the AHIMS search is provided in Appendix D.2.

The AHIMS search identified 102 sites which are categorised in Table 5.1. Of these sites, all are valid (ie they have not been destroyed). This may be largely related to the types of development in the local area, namely wind farms, which are very flexible in design and can be altered to avoid adverse impacts, which is less common in other types of activities. No sites were identified within the development footprint. The closest site is located >1 km south of the proposed encapsulation cell site. These reflect the archaeological investigations of the Woodlawn Wind Farm summarised in Section 5.3.

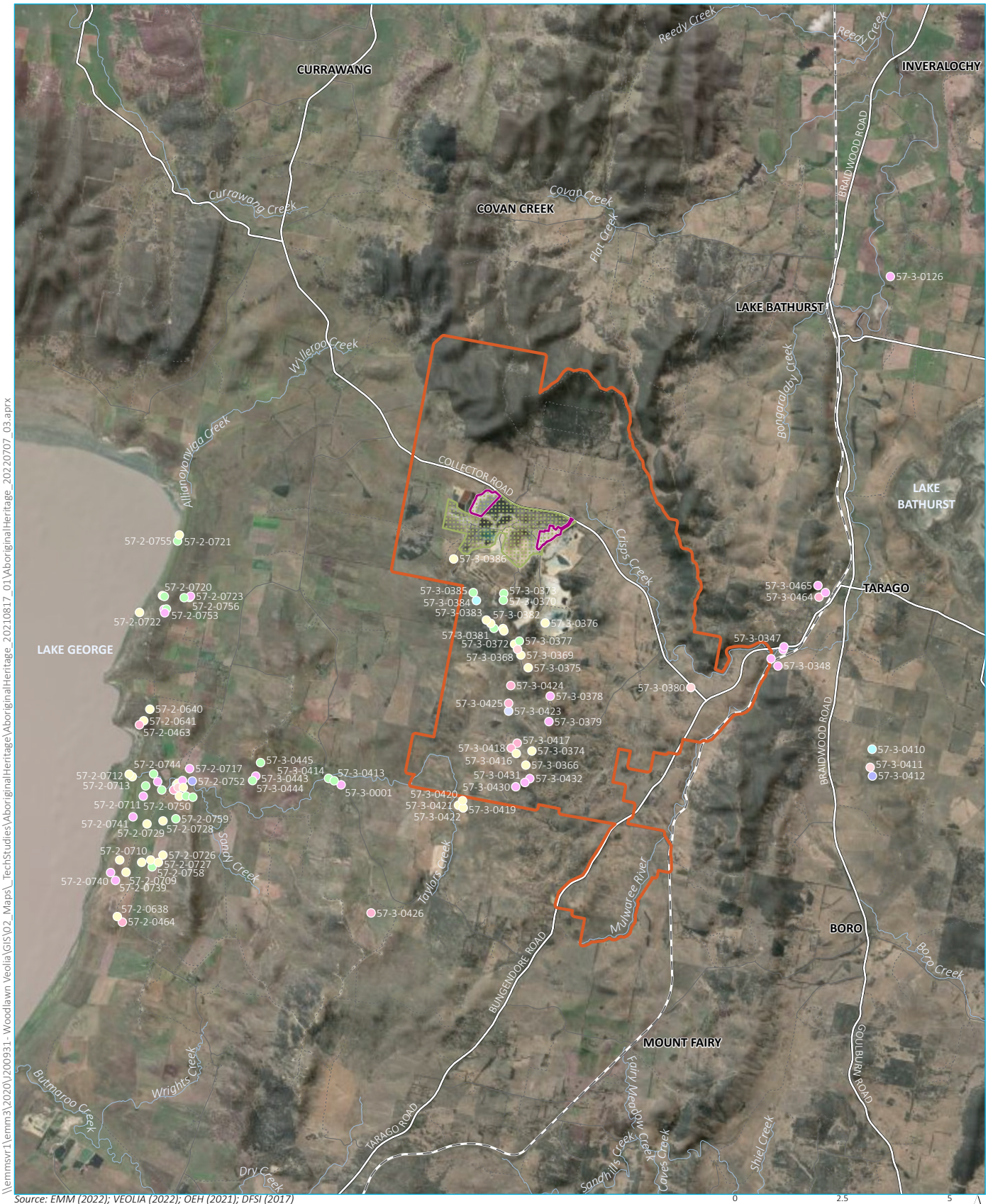
Very few site types are represented in the local region, with only two classifications documented. The majority of sites in the search area are artefact sites (n=92, 89%), and the only other site types that have been recorded are areas of potential archaeological deposit (PAD) (n=11, 11%). It is important to note that an area with PAD means that it is not proven to contain Aboriginal objects, and usually represents the presence of a landform noted as high sensitivity during predictive modelling. Generally, PADs are registered on elevated and/or flat locales in close proximity to water, and notably within the catchments of Taylors Creek and Lake George, as well as a handful of lesser watercourses.

While nearly a quarter of the artefact sites had unspecified artefact numbers (n=24, 24%), of the remainder, most were isolated finds (n=35, 34%) or very low-density scatters where 10 or less were documented (n=22, 22%). Two sites, AHIMS 57-3-0384 and AHIMS 57-3-0410, had high artefact counts of 70 and 300 artefacts, respectively. AHIMS 57-3-0384 is located 2 km south of the proposed encapsulation cell site. Identified during the assessment associated with the Woodlawn Wind Farm, the site comprises a discrete occurrence of over 70 quartz artefacts eroding out of the section of the drainage line (Biosis 2004 in Austral 2011, p. 29). Quartz is a notoriously hard to identify artefactually due to the variable quality and lack of key diagnostic features (Hiscock 1982; Gaynor 1997), although there is currently no reason to doubt this initial recording as presented. The site was considered to be an intact buried archaeological deposit due to the discrete occurrence of the flakes, and at level depth in the eroding section (Biosis 2004, p. 37 in Austral 2011, p. 29). AHIMS 57-3-0410 recorded 300 artefacts and is located ~9 km south east of the project area. The site is described as an extensive artefact scatter eroding out of a silty to sandy loam deposit, interpreted as possible evidence of a knapping event. The dominant raw materials documented at the site included silcrete and quartz (Dibden 2008 in ERM 2011, p. J10). However, it must be noted that these artefacts were recorded over a 500 m exposure, and which would align with densities of <5/m^2 as appears more common for the region.

With respect to site distribution, the registered sites in the region appear to largely reflect compliance-based assessments, with research-based investigations limited to areas of known cultural value such as Lake George. Therefore, the uneven, high-density clustering of sites across the local area is more likely indicative of the level of past investigation, rather than any discernible archaeological patterning. Although where present, the sites do appear to be clustered on the edges of major watercourses and/or elevated landscapes (often in sheltered or saddle locations), as demonstrated by in the review of previous studies in Section 5.3.

Table 5.1 Summary of AHIMS site types within the search area.

Site type	Number of sites		% of Total	
	Category total	Sub-category total	Category total	Sub-category total
Artefactual site	91		89.22	
Isolated artefact		34		33.33
Isolated artefact with subsurface potential (PAD)		1		0.98
Very low density artefact site (2-10)		22		21.57
Low density artefact site (11-20)		5		4.9
Moderate density artefact site (21-45)		3		2.94
High density artefact site (>45)		2		1.96
Artefact site (unspecified density)		24		23.53
Potential archaeological deposit (PAD)	11		10.78	
TOTAL	**102**	**-**	**100**	**-**



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Source: EMM (2022); VEOLIA (2022); OEH (2021); DFSI (2017)

0 2.5 5 km

GDA 1994 MGA Zone 55

N

KEY

- Development footprint
- Veolia integrated waste management operations
- Woodlawn Eco Precinct
- Rail line
- Major road
- Minor road
- Vehicular track
- Named watercourse

AHIMS site

- Artefact site (2-10)
- Artefact site (11-20)
- Artefact site (21-45)
- Artefact site (>45)
- Artefact site (unspecified)
- Isolated find
- Isolated find, PAD
- PAD

AHIMS sites

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Figure 5.2

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5.5 Predictive model

On the basis of the archaeological sites registered in the region, a review of previous archaeological studies and the environmental context, the following conclusions can be drawn regarding the potential presence and location of Aboriginal sites within the project area.

- The following site types would be expected in the project area where disturbance has not resulted in their loss:
  - Isolated artefacts are the most common type of site in the region, and have been identified in all environmental contexts, regardless of previous disturbance.
  - Artefact scatters are also highly common in the region. These are found in two main landforms, either ridgelines, crests, hilltops, and/or in the vicinity of water resources. The former typically occurs in sheltered locations, such as the saddle between two hills, or on the upper slopes off the highest points. In the case of water, sites appear focussed on major water sources, such as the eastern edge of Lake George and Taylors Creek, but researchers document them in association with even minor and/or ephemeral tributaries. Where present, they are usually of low density, <10/m^2, and reflect a transitory use of the region.
  - Potential archaeological deposits, or PADs, have also been documented in the region. These are typically adjacent creeklines, and reflect the potential for buried cultural material to be present. Few have been excavated to date to validate their classification, and only two sites in the general proximity to the project area have been identified to have buried stone artefact material.
- The following site types are expected in the broader region, but to date do not appear to have been documented in the general vicinity of the project area:
  - Quarries may be present on outcrops of raw stone materials suitable for artefact manufacture, many of which occur within the study area as localised, discrete outcrops of siliceous rocks (pebble beds, quartz veins or outcrops). Types of stone used in the manufacture of tools include chert, silcrete, quartz, quartzite and fine-grained volcanic rocks.
  - Burial sites are rare, and historical sources indicate that they are most likely to be found on ridges and hill tops, in hollow trees, in rockshelters, and also in deep sand bodies (eg alluvium). Burials may be difficult to identify, as features that were used by Aboriginal people to mark graves, including carved trees and earth mounds, are unlikely to be preserved.
  - Culturally modified trees (scarred or carved) are rare, as scars are only likely to be present on trees at least 80-100 years old, and natural vegetation in the Goulburn region has been altered by fire and agricultural/pastoral practises. Most of the recorded trees in the region have been destroyed in bushfires or removed to museums or keeping places.
  - Bora grounds are rare, and based on available site information and historical sources are most likely to be located on hill tops; however, their location cannot be predicted accurately.
  - Rockshelters with art or deposit are found only in areas with suitable rock overhangs, such as sandstone outcrops with cavernous weathering. Large granite boulders and limestone rock shelters were also used as shelters.
  - Grinding grooves are most commonly found near creek lines with suitable sandstone outcrops. Sandstone slabs were also transported into areas where there was no suitable stone.

6 Field investigation

6.1 Key findings

- Two field investigations were undertaken during the ACHA due to the COVID restrictions in mid-late 2021. Initially, the report was based on an initial site familiarisation visit by an archaeologist during the early stages of the project. This was followed by a more extensive field investigation with Aboriginal representatives in late November 2021.

- The field investigations confirmed the desktop information for the development footprint. Specifically, that significant earthworks and ground disturbance had occurred in the past. With the possible exception of a vegetated portion north of the encapsulation cell site, no areas of unmodified landscape were identified.

- The field investigations indicated that the ARC reflected an artificial bench excavated into the broader slopes of the Lake George Gate, with earthworks of at least a metre to the south, and significant erosion and soil profile loss to the north. The encapsulation cell site is within an existing artificially created evaporation dam. No remnant vegetation was observed, with the possible exception of a thin strip of trees adjacent Collector Road (and which would be unaffected by the proposed works). Soil profiles observed reflected extensive truncation, frequently into the B2 horizon and potentially at the B/C transition.

- No Aboriginal objects or areas of potential were identified within the development footprint. An area to the north of the encapsulation cell and adjacent Collector Road, could not be robustly investigated and may reflect undisturbed soil profiles within which cultural materials may be present. However, this area is not within the current development footprint. No intangible values or places within the project area were identified by the participating RAPs.

6.2 Inspection and results

As part of the initial familiarisation of the project, Dr Alan Williams undertook an inspection of the development footprint. This was not a formal field survey, but did capture a number of photographs and observations of the two locales to guide and inform the proposed ACHA process. Unfortunately, due to COVID restrictions, a formal field survey was not feasible at that time, with both EMM personnel and RAPs unable to travel to the project area. As such, we use the site familiarisation inspection to inform the ACHA and provide observations of the development footprint. A more formal field survey was undertaken by Dr Williams and four Aboriginal representatives (see Section 2.3) on 21 November 2021. This survey provided a more thorough investigation of the project area, but ultimately changed few of the observations or findings made during the site familiarisation inspection.

These field investigations divided the project area into two main transects, one encompassing the ARC, the other the encapsulation cell. Table 6.1 presents a summary of these transects.

In the case of the encapsulation cell, this area is characterised by a series of evaporation dams and artificially created reservoirs (Plate 6.1). These evaporation dams have been excavated into the base of the valley, or Lake George Gate, in close proximity to Collector Road on the northern fringe of the Eco-Precinct. The exact depth of excavations was not readily discernible due to current high water levels, but Veolia personnel indicate that the dam was at least 3 m in depth. Visually, the water levels were some 2 m below the surrounding landscape, suggesting that at least this amount of the original soil profile has been removed. Exposed areas around the dam's edge were observed, and were characterised as a pale brown heavy clay subsoil (B2 horizon). The frequent presence of broken shale fragments (<3-5cm) across the exposed surface may indicate that truncation of the B2 horizon has been so extensive as to be reaching the under-lying shale geological substrate (Section 3.4). Adjacent and around the dams was heavily utilised for activities within the Eco-Precinct, including a number of access tracks and hard stand areas, as well as various structures. Grammatical issue with previous two sentences I think. Should it be one combined sentence?

To the north of the encapsulation cell, an area of lesser disturbance was observed (Plate 6.2). This was a densely grassed triangle situated adjacent Collector Road and up to the northwest edge of the current evaporation dam. This area could not be robustly inspected at the time of the site inspection. While past activities may have disturbed, this locale, its elevation above the evaporation dam and lack of significant undulations (that were observed elsewhere) suggest this may reflect an intact soil profile in the centre of the Lake George Gate. As such, this area is considered to have some potential for an intact soil profile, and any associated cultural material, to be present. Currently, this area is not within the development footprint.

The ARC has been subject to considerable impact from past activities. While originally, the site likely reflected the mid and lower slope running between the crest to the south of the current void and the valley floor around Collector Road, it is now largely a flat bench. In the south, the difference between the height of the void (the probable natural ground surface) and the ARC footprint is in the order of 3 m; and this may reflect the amount of soil profile that has been removed historically (Plate 6.3; Plate 6.4; Plate 6.5) . Discussions with Veolia personnel indicate that until the current operations, the site encompassed a number of substantial industrial buildings associated with processing recovered mine material. These are now removed, although a number of their foundations were still observable. As with the previous transect, the soil profile was characterised by heavily truncated subsoils and frequent shale fragments.

The northern portion of the ARC does not exhibit the same level of truncation as the south, although still contains frequent soil profile truncation and de-vegetation. This area exhibits numerous erosion scours and rills from water runoff, and an informal dam is present (Plate 6.6; Plate 6.7). A number of tracks, electrical infrastructure and other activities remnant of the former mining operations were observed (Plate 6.6). Vegetation within the development footprint was dominated by dense shrub and young tree regrowth, as well as thick grass cover in the vicinity of Collector Road (Plate 6.8; Plate 6.9). A more established patch of trees was located in close proximity to Collector Road, but these are not within the development footprint (Plate 6.8). No cultural modifications were observed on those trees closest to the proposed activity. Even though these areas close to Collector Road appeared to be more unaffected than other parts of the site, the significant undulations and hummocky nature of the locale suggests earthworks have occurred in the past.

Table 6.1 Survey effective coverage summary

Transect (SU#)	Length (m)	Area (m^2)	Landform	Exposure (%)	Visibility (%)	Effective Coverage (sq m)	Effective Coverage (%)	Aboriginal sites identified
ARC	800	16,000	Mid slope (now modified)	80	60	7,680	48	0
Encapsulation cell	190	3,800	Open depression (now modified)	60	60	1,368	36	0
Average	*495*	*9,900*		*70*	*60*	*4524*	*42*	
Total	**990**	**19,800**				**9048**		**0**



Plate 6.1 **The proposed encapsulation cell location, primarily within the evaporation dam in the foreground, looking northwest. Note the heavily utilised landscape and high visibility around the dam's edge**



Plate 6.2 **A relatively undisturbed lower slope/open depression located northwest of the encapsulation cell site, looking southwest. While not robustly investigated, this portion of the project area appeared relatively undisturbed by past activities**



Plate 6.3 The ARC looking north from the top of the void. The elevation difference between the natural ground surface on which the photographer is standing and the development footprint is clearly observable



Plate 6.4 The northern end of the ARC, looking south towards the void. Note the benched nature of the site leading up to the natural high point in the background. This site was part of a former mine processing plant, and remnants of these activities are still evident. The soil profile reflects a heavily truncated B2 horizon



Plate 6.5 The southern end of the ARC, looking northeast at existing access tracks, some of which will probably be upgraded for the project



Plate 6.6 The northern end of the ARC, looking west. Truncation in this area appears less extensive, but heavy disturbance is still evident. Here this is characterised by erosion scours and water runoff, as well as devegetation



Plate 6.7 The northern end of the ARC, looking northwest. Truncation in this area appears less extensive, but heavy disturbance is still evident. Here this is characterised by erosion scours, water runoff, and an informal dam



Plate 6.8 A small patch of more established vegetation adjacent Collector Road, northeast of the ARC. This area is outside the development footprint



Plate 6.9 The vegetation area adjacent Collector Road through which various road and access requirements for the ARC are proposed. The undulating and hummocky nature of this area suggests historical earthworks have occurred

7 The archaeological and cultural resource

Previous archaeological studies of the region have all provided a consistent and good understanding of the past peopling, visitation and occupation of the project area and surrounds. A combination of academic and CHM studies all demonstrate that the region was initially peopled at least 20,000 years ago, with infrequent forays and/or visits into the southern highlands. The vast majority of the cultural materials recovered, however, show that use of the region was increasingly common only in the last 5,000 years as climatic conditions stabilised. Visitation then appeared to remain seasonal and/or infrequent, perhaps reflecting the cool and windy conditions experienced across the region in the winter months. These activities appear to be focussed on major waterbodies such as Lake George and Lake Bathurst, each some 8 km either side of the project area.

A review of the CHM investigations and the AHIMS database indicate that the cultural materials that demonstrate this past behaviour are almost exclusively in the form of surface and/or shallowly buried stone artefacts. These are typically found adjacent water courses, and/or on elevated areas. In the case of the latter, they are found in protected areas and/or in the saddles of ridgelines to avoid the major wind flows across the region. These cultural materials are sparse, and often consist of single or <10 stone artefacts, reflecting the transitory/seasonal nature of activities in the region. There are occasional discoveries of deeper and/or older buried cultural material associated with major alluvial and/or colluvial environments adjacent big river systems and bases of slopes, respectively. There are also infrequent references to culturally modified trees.

With specific reference to the project area, there is currently no documented evidence of cultural materials. Studies of the adjacent Woodlawn Wind Farm undertaken in 2004 and 2010 identified a small number of stone artefacts on the crest overlooking the site – none of these are in close proximity to the development footprint. In addition, the location of the project area in a valley between the hills fringing Lake George (and known as Lake George Gate) make it an area where Aboriginal people likely traversed the area in the past; and as such has the potential for cultural materials to be present.

However, offset against the potential for cultural materials is the historical and modern activities of that have occurred within the project area. Specifically, the last 50 years have seen the establishment of a mining operation followed by the development of the Eco-Precinct. These have resulted in substantial earthworks and remediation that will have impacted and/or destroyed cultural materials if ever present. In the case of the development footprint, the encapsulation cell is proposed to be within an existing artificially created evaporation dam that has been excavated at least 2 m below the natural ground surface. The ARC similarly appears to be a benched platform cut into the surrounding slopes, and is probably 1-2 m below the original ground surface. While a detailed field survey was not feasible due to COVID restrictions, a brief site inspection validated many of these desktop observations. Specifically, that the development footprint exhibited no evidence of pre-European landscapes or areas where they may be expected. A study undertaken in 1998 of the project area by Navin Officer Heritage Consultants reached similar conclusions.

Of note was an open depression landform immediately north of the encapsulation cell site that does not appear to have been subject to historical or more recent development activities. This area would have been in the centre of the Lake George Gate, and as such is considered to have some potential for cultural materials to be present. Currently, this area shown in Figure 7.1 is not within the development footprint and will be unaffected by the proposed works.

Discussions with the local Aboriginal community (Section 2) has not identified any project specific cultural places or values that would be affected by the project. Focus of these conversations has been on the importance of Lake George (*Ngara)* and Lake Bathurst, both of which are a considerable distance from the project area. Further, neither are visible from the development footprint, nor the broader project area. Given the level of existing disturbance within the development footprint, it is considered that the broader cultural landscape would be unaffected by the project.



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Source: EMM (2022); VEOLIA (2022); DFSI (2017)

0 250 500 m

GDA 1994 MGA Zone 55

N

KEY

- Development footprint
- Some archaeological potential
- Veolia integrated waste management operations
- Woodlawn Eco Precinct
- Woodlawn Mine operations area
- Woodlawn Wind Farm
- Major road
- Minor road
- Vehicular track
- Named watercourse

The archaeological and cultural resource

Woodlawn Advanced Energy Recovery Centre
Aboriginal cultural heritage assessment
Figure 7.1

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8 Significance assessment

8.1 General

All Aboriginal objects in NSW are protected under the *National Parks and Wildlife Act 1974. It is* recognised that the destruction of sites may be necessary to allow other activities or developments to occur. In order for the consent authority to make informed decisions on such matters, an important element of cultural resource management is determining the significance of cultural heritage places and objects to understand what may be lost; and how best it can be mitigated.

Cultural significance is outlined in Article 1.2 of the *Burra Charter* - the best practise document for managing cultural heritage – as 'aesthetic, historic, scientific, social or spiritual value for past, present or future generations' (Australia ICOMOS 2013). These values are reiterated in the NSW guidelines, which determines cultural significance of a place can be assessed by identifying the values that are present across the subject area and assessing what is important and why (OEH 2011). In assessing the scientific significance of sites, aspects such as rarity and representativeness and the integrity must be considered. Generally speaking a site or object that is rare will have a heightened significance, although a site that is suitable for conservation as 'representative' of its type will also be significant. Conversely an extremely rare site may no longer be significant if its integrity has been sufficiently compromised.

The criteria adopted for this report are defined in Table 8.1. The management implications of these sites' significance are discussed in subsequent sections.

Table 8.1 A summary of criteria used to assess the cultural significance (OEH 2011, 8–10)

Criterion	Definition
Social value—Does the place have a strong or special association with a particular community or cultural group for social, cultural or spiritual reasons?	Social (or cultural) value refers to the spiritual, traditional, historical or contemporary associations and attachments the place or area has for Aboriginal people. Social or cultural value is how people express their connection with a place and the meaning that place has for them. Social or cultural value can only be identified through consultation with Aboriginal people.
Historic value—Is the place important to the cultural or natural history of the local area and/or region and/or state?	Historic value refers to the association of a place with a historically important person, event, phase or activity. Historic places do not always have physical evidence of their historical importance (such as structures, planted vegetation or landscape modifications). They may have 'shared' historic values with other (non-Aboriginal) communities.
Scientific (archaeological) value—Does the place have potential to yield information that will contribute to an understanding of the cultural or natural history of the local area and/or region and/or state?	Scientific (archaeological) value refers to the importance of a landscape, area, place or object because of its rarity, representativeness and the extent to which it may contribute to further understanding and information. Information about scientific values is gathered through archaeological investigation undertaken in this report.
Aesthetic value—Is the place important in demonstrating aesthetic characteristics in the local, regional, and/or State environment?	Aesthetic value refers to the sensory, scenic, architectural and creative aspects of the place. It is often linked with social value, and can consider form, scale, colour, texture and material of the fabric or landscape, and the smell and sounds associated with the place and its use. This value is only relevant to archaeological sites on only rare occasions, such as rockshelters that contain art, or culturally modified trees in prominent positions, etc.

8.2 Statement of significance

From a scientific perspective, the archaeological investigations undertaken for this ACHA found no evidence of surface or subsurface cultural material, and as such the development footprint is considered to have low-nil archaeological significance. The development footprint has been subject to significant historical disturbance, and is within an existing waste management facility. As such, the site is considered to have no aesthetic values. No association with key historical individuals or organisations has been identified through the ACHA that may warrant its identification under this criterion.

No project specific cultural values have been vocalised by the RAPs for the development footprint to date. Discussions have identified the importance of Lake George and Lake Bathurst to the Aboriginal community, but these are both some distance from the project area; and cannot see, nor be seen from, the project area. No connection between the development footprint and these key locales has been advised by the RAPs during the consultation process. As such, it is concluded that the development footprint has no specific cultural values.

A small undeveloped portion of the site to the north of the encapsulation cell is considered to have some potential to retain cultural materials. This locale would be considered of low to moderate scientific significance until it can be validated as retaining cultural materials. Currently, this locale is outside of the development footprint, and would be unaffected by the proposed works.

9 Impact assessment

9.1 Key findings

- The project would involve earthworks and construction activities within the ARC and encapsulation cell footprints. This would remove the upper portion of the soil profile currently present at the site.
- The development footprints are heavily impacted by past activities. No cultural materials have been identified within the development footprint, nor are expected to occur. No intangible values for the development footprint have been identified to date. As such, it is considered that there would be no impacts to Aboriginal heritage.

9.2 Project impacts

As outlined in Section 1, the proposed activity involves the establishment of the ARC building and ancillary infrastructure, IBA maturation area, ash handling equipment, substation, roads and the encapsulation cell (Figures Figure 1.1-Figure 1.2). While specific design details remain conceptual, it is considered probable that these construction activities would impact >1 m of the upper soil profile, which based on regional data is the zone within which cultural material may be present.

The ancillary activities would require less disturbance, but even the installation of roads, services, etc would typically undertake the removal of topsoil and compaction prior to establishment, and therefore impacts to the upper soil profile of at least 50 cm would be expected. All of these activities would require removal of trees and other surface debris (eg loose stones, etc) prior to establishment.

9.3 Potential Aboriginal heritage impact

No Aboriginal objects, places or deposits were identified within the development footprint. The development footprint has been subject to extensive disturbance that has removed a considerable portion of the natural soil profile, probably several metres, and as such the former surface and topsoil units within which cultural material may occur have been lost. As such, it is considered that the project is unlikely to have an impact upon tangible cultural material.

The project area is within a broader cultural landscape that encompasses important cultural places such as Lake George and Lake Bathurst. However, the project is not in close proximity, nor within sight, of these places. Further, the development footprint is already within a heavily industrial location, and would be utilising existing disturbed areas; and therefore not increasing any impact into the natural unmodified environment surrounding the Eco-Precinct. No site-specific intangible or cultural values were identified during the ACHA process, and the proposed works would therefore be unlikely to impact such places based on current evidence.

9.4 Inter-generational equity

Intergenerational equity is the principle whereby the current generation should ensure the health, diversity and longevity of the environment for the benefit of future society. For Aboriginal heritage management, intergenerational equity can be considered primarily in terms of the cumulative impacts to Aboriginal objects, sites and/or places in a region. If few Aboriginal objects and places remain in a region (eg due to development impacts), there are fewer opportunities for future generations of Aboriginal people and the broader community to enjoy the cultural benefits.

Information about the integrity, rarity and representativeness of the Aboriginal objects, sites and places that may be impacted, and how they inform the past visitation and occupation of land by Aboriginal people, are relevant to the consideration of intergenerational equity and the understanding of the cumulative impacts of a project.

No cultural material or intangible values were identified as part of the ACHA investigation. It is therefore considered that the project would have negligible intergenerational loss to Aboriginal archaeological and cultural resources of the region.

10 Management and mitigation

10.1 Key findings

- The ACHA concludes that the development footprint is unlikely to contain any tangible cultural materials having been extensively disturbed by historical mining and water management activities. In several parts of the development footprint, over 2 m of the natural soil profile has been removed, and any cultural material that may have been present. Despite being within an extensive cultural landscape, the project would have no additional impacts to any unmodified environments within the Eco-Precinct, and no site-specific intangible values have been identified.

- Recommendations are proposed for inclusion in the project approval to guide post-approval requirements for Aboriginal heritage (Section 10.3). These include the development of an Aboriginal Cultural Heritage Management Plan to provide a framework for such activities, as well as direction on its content. This includes the need for an on-Country opportunity for the local Aboriginal community that was not feasible during the ACHA due to COVID restrictions.

10.2 Management strategy

This ACHA process, which included consultation with the Aboriginal community and site investigation, identified no Aboriginal objects or sites within the development footprint. Despite being within an important cultural landscape between Lake George and Lake Bathurst, the project area has been subject to extensive industrial development over the last 50 years. This includes the establishment of an open cut mine, the current waste management activities, and to a lesser extent a recent wind farm addition. The development footprint is situated in the centre of these activities, and both locations have seen at least 1-2 m of the natural soil profile removed - the zone within which cultural materials would be expected based on the regional record. If present these cultural materials would have likely consisted of low densities of stone artefacts dating to the last 5,000 years, and reflected the transitory use of the region. Based on these findings, it is considered that the project would have no direct or indirect impacts to tangible cultural material within the project area.

Consultation with the local Aboriginal community has highlighted the importance and cultural values of a number of places and sites in the general region, including Lake George and Lake Bathurst. However, no project area specific places or values were advised. Three previous studies of the project area in 1998, 2004 and 2010, similarly did not identify any such values within the site. The project would have no direct or indirect impacts to these important cultural places, which are over 8 km away and cannot be seen from, or by, the project. Further, the project is entirely within the active waste management facility and would therefore result in no additional impact to the natural landscapes currently present around the Eco-Precinct.

In NSW, Aboriginal objects are provided with statutory protection by the *National Parks and Wildlife Act 1974*. In general, where a proposed activity will result in harm to an Aboriginal object, an application must be made to Heritage NSW and an Aboriginal Heritage Impact Permit (AHIP) must be granted before any harm may occur. If granted, the AHIP will contain conditions intended to manage and mitigate the identified impact, and allowing harm to proceed.[1] For works proposed to be assessed under Division 4.7 of the EP&A Act, an AHIP is not required. Any identified harm and any mitigation measures will instead be managed through the project's conditions of approval. The conditions of approval generally incorporate Aboriginal heritage management requirements based on advice from Heritage NSW, and the ACHA.

[1] Where an ACHA does not identify any Aboriginal heritage within a development area, works may proceed based on the recommendations of the ACHA, which may include a range of requirements associated with consultation, continual monitoring and/or other on-site/off-site needs. Such a project can still have significant risks, since where cultural material is encountered unexpectedly, it can result in significant delays.

For the purposes of this project, recommendations below include the development of an Aboriginal Cultural Heritage Management Plan (ACHMP) to provide the post-approval management framework for all future Aboriginal heritage requirements for the project. They further outline the specific mitigation measures that should be implemented prior to, during and after the development. These are relatively minor, since no cultural materials were identified, and include measures to ensure the continuation of Aboriginal consultation and engagement, appropriate documentation of the works to date, unexpected finds protocols, and lodging the ACHA with appropriate public repositories.

A small portion of unmodified grassland is located immediately north of the encapsulation cell site (Figure 7.1), and which is considered to have some potential for cultural material to have survived (if present). However, no activities are proposed in this locale. Should this area require disturbance, it would need further assessment, including field survey and/or test excavations. These requirements have also been included as a component of an ACHMP if necessary.

10.3 Recommendations

The following recommendations are made to be included within the Minister's Conditions of Approval (MCoA) for the State Significant Development #21184278, with regards to Aboriginal cultural heritage:

- Prior to ground disturbance, an Aboriginal cultural heritage management plan (ACHMP) must be developed by a heritage specialist in consultation with the Aboriginal stakeholders and consent authority to provide the post-approval framework for managing Aboriginal heritage within the project area. The ACHMP should include the following aspects:
    - process, timing, and communication methods for maintaining Aboriginal community consultation and participation through the remainder of the project;
    - process, timing and methods for the RAPs to visit the project area before any development activities are initiated, identify any cultural concerns and further discuss any mitigation measures that may be required for the project;
    - descriptions and methods of any additional investigative and/or mitigative archaeological actions that may be required, prior to works commencing or during the project. These may include cultural inductions for all personnel and subcontractors outlining the past history and sensitivity of the region, archival recording, archaeological field survey, excavation and/or cultural monitoring for any areas where the surface impacts of the project intersect the identified Aboriginal objects and/or sites, and/or areas of archaeological sensitivity (specifically as presented in Figure 7.1 of this ACHA), and any additional requirements identified by the Aboriginal community;
    - description and methods of post-excavation analysis and reporting of any archaeological investigations and activities implemented as part of the ACHMP. For excavations, these should include suitable collection and processing of stone artefacts, and chronological, soil, and environmental samples;
    - description and methods for undertaking further Aboriginal heritage assessment, investigation and mitigation of any areas of the development footprint that have changed following completion of the Aboriginal heritage assessment and/or during the final design and construction phases of the project;
    - procedures for managing the unexpected discovery of Aboriginal objects, sites and/or human remains during the project;

- procedures for the curation and long-term management of cultural materials recovered as part of the works outlined in the ACHMP and any preceding stages associated with the project; and

- processes for reviewing, monitoring, and updating the AHMP as the project progresses.

- The Construction Environment Management Plan (CEMP), or equivalent, should reinforce how the cultural landscape is considered throughout the project and detail the rehabilitation of the project area. This should be undertaken in consultation with the RAPs.

- Consultation should be maintained with the RAPs during the finalisation of the assessment process and throughout the construction phase of the project. Details for how this consultation should be undertaken will be outlined in the ACHMP.

- A copy of the ACHA should be lodged with AHIMS and provided to each of the RAPs.

- Where the heritage consultant changes through the project, suitable hand over should occur to minimise loss or mistranslation of the intent of the information, findings and future steps in heritage management.

References

ACT Heritage Council 2015 *Birrigai Rock Shelter*, access 2 September 2021 <https://www.environment.act.gov.au/__data/assets/pdf_file/0008/696500/Background-Information-Birrigai-Rock-Shelter-ENDORSED-HCM-20150604.pdf>

AAJV 2020, *Windsor Bridge Replacement Project: Salvage Excavation Report – Aboriginal Heritage*, prepared for NSW Roads and Maritime Services.

AMBS 2012, *Goulburn Mulwaree LGA Aboriginal Heritage Study*, prepared for Goulburn Mulwaree Council.

Austral 2011, *Capital Wind Farm II Tarago Region, NSW: Aboriginal Archaeological & Cultural Heritage Assessment*, prepared for Infigen Energy.

Bannerman, S M & Hazelton, P A 1990, *Soil landscapes of the Penrith 1:100 000 sheet*, Soil Conservation Service of N.S.W.

Bennett, G 1967 [1834] *Wanderings in New South Wales, Batavia, Pedir Coast, Singapore, and China; being the journal of a naturalist in those countries, during 1832, 1833, and 1834,* vol 1, Ibotson and Palmer, London.

Biosis 2004 *An Archaeological Survey of the proposed Woodlawn Wind Farm, Tarago, New South Wales*, Report to EHN (Oceania) Australia & URS Australia Pty Ltd.

- 2010, Woodlawn Wind Farm Additional Turbine Extension: Archaeological Assessment Indigenous Cultural Heritage, prepared for Infigen Energy Pty Ltd.

Boot, P 1994 *Recent Research into the Prehistory of the Hinterland of the South Coast of New South Wales,* in Sullivan, M, Brockwell, S & Webb, A (eds) *Archaeology in the North: Proceedings of the 1993 Australian Archaeological Association Conference*, NARU: Darwin.

Bowler, J M, Johnston, H, Olley, J M, Prescott, J R, Roberts, R G, Shawcross, W, & Spooner, N A 2003, New ages for human occupation and climatic change at Lake Mungo, Australia, *Nature* 441, pp. 837-840.

Bradshaw, C J A., Ulm, S, Williams, A N., Bird, M I., Roberts, R G., Jacobs, Z, Laviano, F, Weyrich, L S., Friedrich, T, Norman, K, and Saltré, F. 2019, Minimum founding populations of the first people to colonise Australia, *Nature Ecology and Evolution* 3(7), pp. 1057-1063.

Cartoscope Pty Ltd nd *Geological sites of NSW: Lake George,* viewed 8 August 2021 http://www.geomaps.com.au/scripts/lakegeorge.php

Costin, A B & Polach, H A 1973, Age and significance of slope deposits, Black Mountain, Canberra, *Australian Journal of Soil Research* 11(1), pp. 13 – 25.

Dortch, C 1979, Devil's lair: an example of prolonged cave use in southwestern Australia, *World Archaeology* 10, pp. 258-279.

Dibdin, J 2007, *Proposed Gullen Range Wind Farm Archaeological Assessment*, prepared for NGH Environmental on behalf of Epuron Pty Ltd.

- 2008, Erosion Control Works at Rhyanna Road and Tarago, NSW: Aboriginal Archaeological Assessment, prepared for Hawkesbury Nepean Catchment Management Authority.

- 2012, Proposed Collector Wind Farm: Aboriginal Cultural Heritage Assessment, prepared for RATCH-Australia Corporation.

EMM 2021, Woodlawn Advanced Recovery Centre: Historical heritage due diligence assessment, prepared for Veolia Environmental Services (Australia) Pty Ltd.

ERM 2016, *Jupiter Wind Farm Cultural Heritage Assessment Report*, prepared for EPYC Pty Ltd.

Felton, E A, & Huleatt, M B 1975, *Braidwood 1:100 000 Geological Sheet*, Geological Survey of New South Wales, Sydney

Fernyhough, W H & J.G. Austin & Co 1836, *Cullabaa, native of Lake George, Five Islands tribe*, printed by J.G. Austin & Co, No.12, Bridge Street, Sydney, accessed 2 September 2021 <https://nla.gov.au/nla.obj-140393926/view>

Fitzsimmons, K E, Spry, C & Stern, N 2019, Holocene and recent aeolian reactivation of the Willandra Lakes lunettes, semi-arid southeastern Australia, *Holocene* 29, pp. 606-621.

Flood, J M 1973, *The moth-hunters: Investigations towards a prehistory of the south-eastern highlands of Australia*, Australian National University, Canberra, accessed 2 September 2021 <https://openresearch-repository.anu.edu.au/handle/1885/109557>

- 1996 Moth Hunters of the Australian Capital Territory: Aboriginal Traditional Life in the Canberra Region. Australian Institute of Aboriginal Studies, Canberra.

- 1999, Archaeology of the Dreamtime: The story of prehistoric Australia and its people, Angus & Robertson, Sydney.

Hamm, G, Mitchell, P, Arnold, L J, Prideaux, G J, Questiaux, D, Spooner, N A, Levchenko, V A, Foley, E C, Worthy, T H, Stephenson, B, & Coulthard, V 2016, Cultural innovation and megafauna interaction in the early settlement of arid Australia, *Nature* 539, pp. 280-283.

Hiscock, P 1982, A Technological Analysis of Quartz Assemblages from the South Coast, in Bowdler, S (ed), *Coastal Archaeology in Eastern Australia*, ANU Press, Canberra, pp. 32 – 45.

Hughes, P, Shawcross, W, Sullivan, M, & Spooner, N 2014, The geoarchaeology of a Holocene site on the Woolshed Embankment, Lake George, New South Wales, *Australian Archaeology* 78(1), pp.24-32.

Gaynor, P J 1997, The importance of quartz in stone artefact assemblages: A technological analysis of five Aboriginal sites of the Coonabarabran/Warrumbungle region, University of New England, Armidale, accessed 2 September 2021 <https://rune.une.edu.au/web/handle/1959.11/6689>

Golder Associates Pty Ltd 2021 *Stage 1 – Preliminary Ground Assessment: Woodlawn Advance Recovery Centre* report to Veolia Environmental Services (Australia) Pty Ltd.

Gould, R 1977, *Puntutjarpa rockshelter and the Australian desert culture,* Anthropological Papers of the American Museum of Natural History, New York.

Govett, W R 1977 [1836-7] *Sketches of New South Wales: Written and Illustrated for The Saturday Magazine in 1836-37*. Gaston Renard Publisher, Melbourne.

- nd Notes and sketches taken during a surveying Expedition in N. South Wales and Blue Mountains Road by William Govett on staff of Major Mitchell, Surveyor General of New South Wales, 1830-1835, Mitchell Library, viewed 23 August 2021, <https://acms.sl.nsw.gov.au/_transcript/2012/D14753/a5504.htm>

Jackson, S, Tan, P L, Mooney, C, Hoverman, S, & White, I 2012, Principles and Guidelines for Good Practice in Indigenous Engagement in Water Planning, *Journal of Hydrology* 474, pp. 57–65.

Jackson-Nakano, A 2001 *The Kamberri: A History from the Records of Aboriginal Families in the Canberra-Queanbeyan District and Surrounds, 1820-1927, and Historical Overview, 1928-2001*, Aboriginal History, Canberra.

Koettig, M & Lance, A 1986, *An Aboriginal Resources Planning Study for the City of Goulburn, New South Wales*, prepared for Goulburn City Council.

Langley, M C, Clarkson, C & Ulm, S 2011, From small holes to grand narratives: the impact of taphonomy and sample size on the modernity debate in Australia and New Guinea*, Journal of Human Evolution* 61, pp.197–208.

Lawson, E 1989 *Louisa Atkinson: the distant sound of native voices / Elizabeth Lawson* English Dept, University College, Australian Defence Force Academy, Canberra.

MacAlister, C 1907, *Old Pioneering Days in the Sunny South*, Chas MacAlister Book Publication Committee, Goulburn.

Mulvaney, J & Kamminga, J 1999, *The Prehistory of Australia*. Allen & Unwin, Sydney.

Navin Officer 1998, Proposed Woodlawn Mine Landfill/Rehabilitation Project – Cultural Heritage Assessment, report prepared for Collex Waste Management Pty Ltd.

NSW NPWS 2003 *The Bioregions of New South Wales: their biodiversity, conservation and history,* NSW National Parks and Wildlife Service, Hurstville.

O'Connell, J F, Allen, J, Williams, M A J, Cooper, A, Williams, A N, Turney, C S M, Spooner, N A, Kamminga, J, Brown, G & Cooper, A 2018, When did Homo Sapiens first reach Southeast Asia and Sahul? *Proceedings of the National Academy of Sciences* 115(34), pp. 8482-8490.

Parsons Brinckerhoff 2012, *Environmental Assessment: TriAusMin Woodlawn Project*, prepared for TriAusMin.

Pardoe, C 1995, Riverine, biological and cultural evolution in southeastern Australia, *Antiquity* 69(265), pp.696-713.

Pate, F D, Pretty, G L, Hunter, R, Tuniz, C, & Lawson, E M 1998, New radiocarbon dates for the Roonka Flat Aboriginal burial ground, South Australia. *Australian Archaeology* 46, pp. 36-37.

Singh, G, Opdyke, N D, & Bowler, J M 1981a, Late Cainozoic stratigraphy, paleomagnetic chronology and vegetational history from Lake George, NSW, *Journal of the Geographical Society of Australia* 28, pp.435-452.

Singh, G, Kershaw, A P, & Clark, R 1981b Quaternary Vegetation and Fire History in Australia, in Gill, A M, Groves R H, Noble, I R (eds), *Fire and the Australian Biota*, Australian Academy of Science, Canberra, pp.23-54.

Smith, J 1992, *Aborigines of the Goulburn District*, Goulburn & District Historical Society, Goulburn.

Sydney Gazettee and New South Wales Advertiser (10 May 1826).

Sue Rosen & Associates (Rosen) 2018, *Goulburn Mulwaree Council: Heritage Study Review,* Sydney.

Tazewell, S J 1991, *Grand Goulburn: First Inland City of Australia - A Random History*, The Council of the City of Goulburn, Goulburn.

Tobler, R, Rohrlach, A, Soubrier, J, Bover, P, Llamas, B, Tuke, J, Bean, N, Abdullah-Highfold, A, Agius, S, O'Donoghue, A, O'Loughlin, I, Sutton, P, Zilio, F, Walshe, K, Williams, A N, Turney, C S M, Williams, M, Richards, S M, Mitchell, R J, Kowal, E, Stephen, J R, Williams, L, Haak, W, & Cooper, A 2017, Aboriginal mitogenomes reveal 50,000 years of regionalism in Australia, *Nature* 544, pp. 180–184.

Tindale N.B 1974 *Aboriginal Tribes of Australia: Their terrain, environmental controls, distribution, limits and proper names,* Australian National University Press, Canberra.

Turney, C S, Bird, M I, Fifield, L K, Roberts, R G, Smith, M, Dortch, C E, Grün, R, Lawson, E, Ayliffe, L K, Miller, G H, & Dortch, J 2001, Early human occupation at Devil's Lair, southwestern Australia 50,000 years ago, *Quaternary Research* 55, pp. 3-13.

White, J P 1994, Site 820 and the evidence for early human occupation in Australia, *Quaternary Australasia: The newsletter of the Australasian Quaternary Association* 12(2).

Williams, A N, Ulm, S, Goodwin, I, & Smith, M 2010, Hunter–gatherer response to Late Holocene climatic variability in northern and central Australia, *Journal of Quaternary Science* 25(6), pp. 831 – 838.

Williams, A N, Mitchell, P, Wright, R V S, & Toms, P 2012, A Terminal Pleistocene Open Site on the Hawkesbury River, Pitt Town, NSW, *Australian Archaeology* 74, pp. 85-97.

Williams, A N 2013, A new population curve for prehistoric Australia. *Proceedings of the Royal Society B: Biological Sciences* 280(1761), pp. 20130486.

Williams, A N, Ulm, S, Cook, A.R., Langley, M., & Collard, M. 2013, Human refugia in Australia during the Last Glacial Maximum and Terminal Pleistocene: A geo-spatial analysis of the 25-12ka Australian archaeological record, *Journal of Archaeological Science,* 40, pp. 4612-4625.

Williams, A N, Ulm, S, Smith M, & Reid, J 2014, AustArch: A Database of 14C and Non-14C Ages from Archaeological Sites in Australia - Composition, Compilation and Review (Data Paper), Internet Archaeology 36(36).

Williams, A N, Burrow, A, Toms, P, Brown, O, Richards, M, & Bryant, T 2017, The Cranebrook Terrace Revisited: Recent Excavations of an Early Holocene Alluvial Deposit on the banks of the Nepean River, NSW, and their Implications for Future Work in the Region, *Australian Archaeology* 87(3), pp. 100-109.

Williams, A N, Veth, P M, Steffen, W, Ulm, S, Turney, C S M, Reeves, J, Phipps, S, & Smith, M 2015a, A Continental Narrative: Human Settlement Patterns and Australian Climate Change over the last 35,000 Years, *Quaternary Science Reviews* 123, pp. 91-112.

Williams, A N, Ulm, S, Turney, C S M, Rodhe, D, & White, G 2015b, The Establishment of Complex Society in Prehistoric Australia: Demographic and Mobility Changes in the Late Holocene, *PLOS One,* 10(6), pp. e0128661.

Williams, A N, Ulm, S, Sapienza, T, & Lewis, S E 2018 Sea-level change and demography during the last glacial termination and early Holocene across the Australian continent, *Quaternary Science Reviews* 182, pp.144-154

Wright, R 1986, How old is Zone F at Lake George?, *Archaeology in Oceania* 21 pp. 138 – 139.

Veth, P M 1993, *Islands in the Interior: The Dynamics of Prehistoric Adaptations Within the Arid Zone of Australia* International Monographs in Prehistory.

Annexure A
Legislative context

EMM
creating opportunities

A.1 Commonwealth

Aboriginal and Torres Strait Islander Heritage Protection Act 1984

The *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* preserves and protects areas (especially sacred or intangible sites) and places of particular significance to Aboriginal people from damage or destruction. Steps necessary for the protection of a threatened place are outlined in a gazetted Ministerial Declaration (Sections 9 and 10); and which can result in a cessation of any development activity.

In addition, the Act also protects objects by Declaration, notably Aboriginal skeletal remains (Section 12). This can be applied at a State level where a State is unwilling or unable to provide such protection.

Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* provides for protection of natural and cultural heritage places. The Act establishes a National Heritage List (NHL) and a Commonwealth Heritage List (CHL) upon which places of natural or cultural significance can be listed. Sites at a national level and can be in public or private ownership. The CHL is limited to places owned by the Commonwealth, and most frequently encompass Department of Defence sites. Sites and places listed on the NHL are considered to be of State and local heritage value, even if they are not listed or documented as such at a State level.

The values of sites and places on the NHL/ CHL are protected under the EPBC Act. The Act requires that the Minister administering the Act assess any action which has, will have, or is likely to have, a significant impact on the heritage values. Where relevant, a referral is made to the relevant Commonwealth Department, and either approval, approval with controls, or rejection of the proposed action is determined.

Native Title Act 1993

The *Native Title Act 1993* provides recognition and protection for native title. The Act establishes the managing body, National Native Title Tribunal, who administers native title claims to rights and interests over lands and waters by Aboriginal people. It also administers the future act processes that allow proponents to identify and manage potential native title issues for a given activity on a site where a claim has yet to be made or finalised.

In addition, the Act provides for Indigenous Land Use Agreements (ILUA), which is an agreement between a native title group and others about the use and management of land and waters. ILUAs were introduced as a result of amendments to the Act in 1998. They allow people to negotiate flexible and bipartisan agreements to suit their particular circumstances often circumventing lengthy timeframes associated with the native title process. An ILUA can be negotiated over areas where native title has, or has not yet, been determined. They can be part of a broader determination or settled separately.

A.2 State

Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) is the over-arching Act that dictates the nature of assessment and management of the environment during a development project, and within which heritage forms a component. It requires that environmental and heritage impacts are considered by consent authorities prior to granting development approvals.

The Act has two main approval pathways within which heritage needs to be considered. Generally for smaller scale (either financially or spatially), Parts 4 (Division 4.1) and 5 (Division 5.1) of the Act are implemented. Part 4 requires that a proponent submits a Development Application (DA) to local council for a given development, and within this document a consideration of Aboriginal and historical heritage is required. The specific nature of the assessment is usually determined at a pre-DA meeting with the council, and in relation to the relevant heritage Acts. Where Aboriginal heritage is identified as an issue, the DA may become Integrated Development, whereby the State government is also required to review and provide comments on the DA prior to its issue. Part 5 of the Act is a similar process, but only relates to approvals developed and issued by State government departments. Each State government department has their own internal approach to considering environmental issues, but ultimately must develop a Review of Environmental Factors (REF), which is comparable to a DA, and which requires consideration and management of heritage. Similarly where heritage is identified as an issue, liaison with relevant State consent authorities and approvals under other Acts may still be required.

The other approval pathway relates to State Significant Development and/or Infrastructure (Parts 4.7 and 5.2, respectively). These processes require an Environmental Impact Statement (EIS) to be developed for a project and assessed currently by the Heritage NSW (formerly the Department of Planning, Industry and Environment). Importantly, the SSD and SSI processes turns off a number of pieces of other legislation, including parts of the *National Parks and Wildlife Act 1974*. In the case of Aboriginal heritage, both the assessment and approval for harm are dictated by the Secretary's Environmental Assessment Requirements (SEARs) outlining the contents and scope of the EIS, and the Project Approval that dictates controls on how a development should proceed.

National Parks and Wildlife Act 1974

The National Parks and Wildlife Act 1974 (NPW Act) provides protection for Aboriginal objects and places across NSW:

- An Aboriginal object is defined as: *Any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains.*

- An Aboriginal place is: *any place declared to be an Aboriginal place under section 84*. This is a very specific piece of legislation that provides process and management of Aboriginal sites of cultural, but not necessarily scientific, values. They are commonly, but not always associated with intangible values.

- any place declared to be an Aboriginal place by the Minister for the Environment, under Section 84 of the Act.

It is an offence to disturb Aboriginal objects or places without an Aboriginal Heritage Impact Permit (AHIP), which is outlined in Section 90 of the Act. Currently, such permits can be sought from Heritage NSW.

To obtain an AHIP, certain assessment and documentation (outlined in this report) must be provided to DPC for their consideration. Once satisfied, they may endorse an AHIP to harm cultural heritage either conditionally or unconditionally. They can also refuse an application as outlined in Section 90C of the Act, and which can be appealed in accordance with Section 90L.

Aboriginal Land Rights Act 1983

The *Aboriginal Land Rights Act 1983* provides process and protocols for the transfer of vacant Crown land ownership to a Local Aboriginal Land Council, where the land is not for an essential purpose or for residential land. These lands are then managed and maintained by the Local Aboriginal Land Council.

For the purposes of this report, the Act is primarily important to inform relevant Aboriginal communities for consultation; and where Crown land forms part of the development area may require additional liaison with the LALC as a potential, or existing, landowner.

Annexure B - Redacted

Aboriginal community consultation

EMM
creating opportunities

B.1 Consultation log and communications record

Aboriginal Consultation Requirements for Proponents (DECCW 2010)*						
ABORIGINAL COMMUNICATIONS LOG						
Project Name: Woodlawn Advanced Energy Recovery Facility					Project #: XXX	
DATE	OUTGOING / INCOMING	ORGANISATION	CONTACT MADE BY	CONTACT TO	CONTACT TYPE	COMMENTS
28-May-21	Outgoing	Heritage NSW (South East Division) The Office of the Registrar, Aboriginal Land Rights Act 1983 (ORLALA) National Native Title Tribunal (NNTT) Native Title Services Corporation (NTSCORP) Pejar Local Aboriginal Land Council (Pejar LALC) South East Local Land Services (SE LLS) Goulburn Mulwaree Council	Georgia Burnett (EMM)	Various	Email	Request for contact information for local Aboriginal stakeholders.
28-May-21	Incoming	Goulburn Council NNTT SE LLS Heritage NSW	-	Georgia Burnett (EMM)	Email	Automated reciepts.
31-May-21	Incoming	Heritage NSW	Barry Gunther	Georgia Burnett (EMM)	Email	Provided Heritage NSW stakeholder list. Acknowledged reciept.
07-Jun-21	Incoming	Goulburn Mulwaree Council	Emily Todkill	Georgia Burnett (EMM)	Email	Provided contact details for Pejar LALC. Acknowledged reciept.
09-Jun-21	Outgoing	Identified potential Aboriginal stakeholders as a result of agency requests	Georgia Burnett (EMM)	Various	Email and post	Provided an invitation to register interest for consultation on the project. Requested responses by 23 June 2021.
09-Jun-21	Outgoing	-	Skye McParland (Veolia)	Goulburn Post	Newspaper ad	Advertisement to register interest in the project appeared in the *Goulburn Post*.
09-Jun-21	Incoming	Didge Ngunawal Clan	Lily Carrol	Georgia Burnett (EMM)	Email	Registered interest in the project. Acknowledged reciept.
09-Jun-21	Incoming	Ginninderra Aboriginal Corporation	Krystle Carroll-Elliott	Georgia Burnett (EMM)	Email	Registered interest in the project. Acknowledged reciept.
10-Jun-21	Incoming	Corroboree Aboriginal Corporation	Marilyn Carroll-Johnson	Georgia Burnett (EMM)	Email	Registered interest in the project. Acknowledged reciept.
11-Jun-21	Incoming	Muragadi	Jesse Johnson	Georgia Burnett (EMM)	Email	Registered interest in the project. Acknowledged reciept.
11-Jun-21	Incoming	Konanggo Aboriginal Cultural Heritage Services	Robert Young	Georgia Burnett (EMM)	Email	Registered interest in the project. Acknowledged reciept.
17-Jun-21	Incoming	Ngunnawal Elders Corporation	Robert Williams	Georgia Burnett (EMM)	Email	Registered interest in the project. Noted the study area is "situated close to the boundary of Kamberri (Walgalu)-Ngunnnawal-Gundangara language groups, as well as sharing geographical connection with south coast Aboriginal groups, and is also located close to Weewara and Lake Bathurst which are of the utmost cultural importance with archaeological sequences dating back many millennia." Referenced Ann Jackson-Nakano's works "The Pajong" and "The Kamberri" as containing relvant ethnographic information to the area. Acknowledged reciept, thanked for information.
17-Jun-21	Incoming	Yurwang Gundana Cultural Heritage Services	Dean Bell	Georgia Burnett (EMM)	Email	Registered interest in the project. Acknowledged reciept.
18-Jun-21	Incoming	Ngunawal Heritage Aboriginal Corporation	Dean Delponte	Georgia Burnett (EMM)	Email	Registered interest in the project. Acknowledged reciept.
20-Jun-21	Incoming	Woka Aboriginal Corporation	Steven Johnson	Georgia Burnett (EMM)	Email	Registered interest in the project. Acknowledged reciept.
22-Jun-21	Incoming	Freeman & Marx Pty Ltd	Clive Freeman	Georgia Burnett (EMM)	Email	Registered interest in the project. Acknowledged reciept.
22-Jun-21	Incoming	Freeman & Marx Pty Ltd	Peter Markovic	Georgia Burnett (EMM)	Email	Registered interest in the project. Acknowledged reciept.
23-Jun-21	Incoming	Yurrandaali Cultural Services	Bo Field	Georgia Burnett (EMM)	Email	Registered interest in the project. Acknowledged reciept.
30-Jun-21	Incoming	Thunderstone Aboriginal Cultural Services Pty Ltd	Tyronne Bell	Georgia Burnett (EMM)	Email	Registered interest in the project, apologised for delay responding. Acknowledged reciept.
02-Jul-21	Outgoing	Pejar LALC; Didge Ngunawal Clan; Ginninderra Aboriginal Corporation; Corroboree Aboriginal Corporation; Muragadi; Konanggo Aboriginal Cultural Heritage Services; Ngunnawal Elders Corporation; Yurwang Gundana Cultural Heritage Services; Ngunawal Heritage Aboriginal Corporation; Woka Aboriginal Corporation Freeman & Marx Pty Ltd; Yurrandaali Cultural Services; Thunderstone Aboriginal Cultural Services Pty Ltd (hereafter, 'All RAPs')	Georgia Burnett (EMM)	Various	Email	Provided letter outlining the proposed assessment methods for the ACHA. Requested responses by 30 July 2021.
02-Jul-21	Incoming	Didge Ngunawal Clan	Lily Carrol	Georgia Burnett (EMM)	Email	Short response confirming agreement with assessment methods. Acknowledged reciept on 7 July 2021.
05-Jun-21	Incoming	Muragadi	Jesse Johnson	Georgia Burnett (EMM)	Email	Short response confirming agreement with assessment methods. Noted family ties to Goulburn area (Ngunnawal people). Acknowledged reciept on 7 July 2021.
06-Jul-21	Outgoing	Pejar LALC; Yurwang Gundana Cultural Heritage Services	Georgia Burnett (EMM)	Delise Freeman; Dean Bell	Email	Resent letter after emails initially bounced.
06-Jul-21	Outgoing	Pejar LALC; Heritage NSW	Georgia Burnett (EMM)	Delise Freeman; Heritage Mailbox	Email	Provided list of RAPs for the project.
06-Jul-21	Incoming	Pejar LALC	Delise Freeman	Georgia Burnett (EMM)	Email	Acknowledged reciept of stakeholders. Expressed frustration that the list of registered stakeholders contained names of people not from Country. GB acknowledged reciept, and welcomed names of known knowledge holders, on 8 July 2021.
25-Jul-21	Incoming	Yurwang Gundana Cultural Heritage Services	Merekai Bell	Georgia Burnett (EMM)	Email	Short response confirming agreement with assessment methods. Acknowledged reciept on 26 July 2021.
26-Jul-21	Outgoing	All RAPs	Georgia Burnett (EMM)	Various	Email	Reminder for closing of comment period for assessment methods.
26-Jul-21	Incoming	Woka Aboriginal Corporation	Steven Johnson	Georgia Burnett (EMM)	Email	Responded in support of assessment methods.
27-Jul-21	Incoming	Yurwang Gundana Cultural Heritage Services	Merekai Bell	Georgia Burnett (EMM)	Phone	Called to discuss fieldwork availability.

27-Jul-21	Incoming	Ngunnawal Elders Corporation	Robert Williams	Georgia Burnett (EMM)	Email	Responded in support of assessment methods. Agreed area was highly disturbed but also noted small creek in vicinity of the study area, increasingly the likelihood of sites in the area. Referred to Amy Way's research at Weereewa/Lake George, which recovered numerous artefacts within sand dunes near the lake. Aware of a men's site south of Weereewa/Lake George, but no knowledge of sensitive or intangible sites within the project area. Acknowledged reciept 30 August 2021.
02-Aug-21	Incoming	Thunderstone Aboriginal Cultural Services Pty Ltd	Tyronne Bell	Georgia Burnett (EMM)	Phone	Called to discuss assessment methods. Rasied concerns about people travelling from Sydney due to current COVID restrictions. GB acknowledged risk, highlighting that EMM was still in dicussions with the client on how we are handling regional travel but that likely a non-Sydney team member would lead the on site investigations, and RAPs would be notified when EMM/Veolia came to a decision.
03-Aug-21	Incoming	Yurwang Gundana Cultural Heritage Services	Josephine Reardon	Georgia Burnett (EMM)	Phone	Called to discuss fieldwork timing. Provided secondary contact details.
06-Aug-21	Outgoing	Pejar Local Aboriginal Lands Council, Konanggo Aboriginal Cultural Heritage Services, Ngunnawal Elders Corporation, Yurwang Gundana Cultural Heritage Services, Ngunawal Heritage Aboriginal Corporation, Freeman & Marx Pty Ltd, Thunderstone Aboriginal Cultural Services Pty Ltd		Alan Williams (EMM)	Email	Invited several of the RAPs for a site investigation of the study area.
06-Aug-21	Incoming	Ngunawal Heritage Aboriginal Corporation	Dean Delponte	Alan Williams (EMM)	Email	Advised they could not travel due to COVID situation, and would have to decline.
09-Aug-21	Incoming	Ngunnawal Elders Corporation	Rob Williams	Alan Williams (EMM)	Email	Provided confirmation of attendance and responded to various COVID requirements
09-Aug-21	Incoming	Yurwang Gundana Cultural Heritage Services	Robert Bell	Alan Williams (EMM)	Email	Provided insurances and signed consultancy agreement
09-Aug-21	Incoming	Thunderstone Aboriginal Cultural Services Pty Ltd	Tyronne Bell	Alan Williams (EMM)	Phone	Lengthy discussion around COVID risk and potential Sydney based people attending. Indicated a strong knowledge of the study area.
10-Aug-21	Outgoing	Pejar Local Aboriginal Lands Council, Konanggo Aboriginal Cultural Heritage Services, Ngunnawal Elders Corporation, Yurwang Gundana Cultural Heritage Services, Ngunawal Heritage Aboriginal Corporation, Freeman & Marx Pty Ltd, Thunderstone Aboriginal Cultural Services Pty Ltd		Alan Williams (EMM)	Email	Followed up on requirements for site visit and COVID requirements.
10-Aug-21	Outgoing	Pejar Local Aboriginal Lands Council, Konanggo Aboriginal Cultural Heritage Services, Ngunnawal Elders Corporation, Yurwang Gundana Cultural Heritage Services, Ngunawal Heritage Aboriginal Corporation, Freeman & Marx Pty Ltd, Thunderstone Aboriginal Cultural Services Pty Ltd, Corroboree Aboriginal Corporation, Ginninderra Aboriginal Corporation, Didge Ngunawal Clan		Cameron Neal (EMM)	Phone	Called to follow up on Alan's email regarding COVID safety requirements
10-Aug-21	Incoming	Konanggo Aboriginal Cultural Heritage Services	Robert Young	Cameron Neal (EMM)	Phone and email	Called to further discuss COVID safety requirements. Robert raised some concerns about excluding people from Greater Sydney and asked for Alan's email to be re-sent. Forwarded Alan's email from 10 August 2021 containing COVID safety information to Robert.
10-Aug-21	Outgoing	Corroboree Aboriginal Corporation	Marilyn Carroll-Johnson	Cameron Neal (EMM)	Phone and email	Discussed COVID safety measure over the phone and forwarded on Alan's email from 10 August 2021.
11-Aug-21	Incoming	Freeman & Marx Pty Ltd	Clive Freeman	Alan Williams (EMM)	Phone	Confirmed his attendance and agreement with the COVID protocols.
11-Aug-21	Outgoing	Ginninderra Aboriginal Corporation	Krystle Carroll-Elliott	Cameron Neal (EMM)	Email	Forwarded on Alan's email from 10 August 2021 containing Covid safety information.
13-Aug-21	Outgoing	Pejar Local Aboriginal Lands Council, Konanggo Aboriginal Cultural Heritage Services, Ngunnawal Elders Corporation, Yurwang Gundana Cultural Heritage Services, Ngunawal Heritage Aboriginal Corporation, Freeman & Marx Pty Ltd, Thunderstone Aboriginal Cultural Services Pty Ltd		Alan Williams (EMM)	Email	Cancelled fieldwork following ACT COVID lockdown. Advised of online meetings to be held next week to address the lack of a site visit.
13-Aug-21	Incoming	Konanggo Aboriginal Cultural Heritage Services	Robert Young	Cameron Neal (EMM)	Email	Robert asked whether the site inspection was going ahead given new lockdown rules for ACT. Pointed him to Alan's earlier email advising of cancellation and potential for virtual meetings. Robert indicated his interest in being involved.
16-Aug-21	Outgoing	All RAPs		Alan Williams (EMM)	Email	Organised a series of online meetings/workshops for later in the week to allow presenation and discussion of the site.
16-Aug-21	Incoming	Ngunnawal Elders Corporation	Robert Williams	Alan Williams (EMM)	Phone	Rang to identify concern about not undertaking a site visit. AW advised that the site was heavily disturbed and intangible values were an important focus. AW further advised that there would be potential to discuss on-site activities later in the project, potentially post-approval but prior to development to enable this if still strongly sought after the meeting on Friday
17-Aug-21	Incoming	Pejar LALC	Delice Freeman	Alan Williams (EMM)	Email	Identified concern of certain other RAPs being involved, and that only the LALC should be the only one participating in a site visit. Also asked why the LALC had not been consulted previously. AW advised of the level of previous consultation (that was extensive with the LALC) and that the proponent sought to maximise inclusion of hte registered Aboriginal parties, of which the LALC was one. AW indicated a willingness to meet with the LALC separately if this remained an issue, and would follow up with the RAP of concern in relation to Aboriginality
17-Aug-21	Incoming	Thunderstone Aboriginal Cultural Services Pty Ltd	Tyronne Bell	Alan Williams (EMM)	Email	Advised he could not attend on Friday. AW offered another day next week.
20-Aug-21	Outgoing	Konanggo Aboriginal Cultural Heritage Services, Ngunnawal Elders Corporation, Yurwang Gundana Cultural Heritage Services, Ngunawal Heritage Aboriginal Corporation, Didge Ngunawal Clan		Alan Williams (EMM), Lee Smith (Veolia)	Online meeting	Undertook an online meeting to discuss the project and present a virtual tour of the site due to on-site activities being suspended by COVID. See minutes for further details of discussion
20-Aug-21	Outgoing	Didge Ngunawal Clan, Corroboree Aboriginal Corporation, Woka Aboriginal Corporation, Murgardi		Alan Williams (EMM), Lee Smith (Veolia)	Online meeting	Undertook an online meeting to discuss the project and present a virtual tour of the site due to on-site activities being suspended by COVID. See minutes for further details of discussion

20-Aug-21	Incoming	Gunjeewong Aboriginal Corporation	Cheryl Carroll	Alan Williams (EMM)	Phone	Rang to register interst in the project and attend the meetings. Unfortunately, this was after the meeting was complete, but CT was invited to attend an additional AFG proposed for Monday
23-Aug-21	Outgoing	Thunderstone Aboriginal Cultural Services Pty Ltd	Tyronne Bell	Alan Williams (EMM), Lee Smith (Veolia)	Online meeting	Undertook an online meeting to discuss the project and present a virtual tour of the site due to on-site activities being suspended by COVID. See minutes for further details of discussion
23-Aug-21	Outgoing	All RAPs		Alan Williams (EMM)	Email	Distributed draft minutes for review and comment
31-Aug-21	Incoming	Woka Aboriginal Corporation	Steven Johnson	Alan Williams (EMM)	Email	Provided a lengthy letter rebutting the claims made by Didge Ngunwal Clan in relation to his Aboriginality. AW responded to advise that EMM would continue to consult with Woka Aboriginal Corporation for the remainder of this project. AW advised that any further issues should be dealt with directly to Didge Ngunwal Clan.
17-Sep-21	Outgoing	All RAPs	Georgia Burnett (EMM)	Various	Email	Provided draft ACHA for review. Requested comments provided by Friday 15 October 2021.
19-Sep-21	Incoming	Yurwang Gundana Cultural Heritage Services	Merekai Bell	Georgia Burnett (EMM) Alan Williams (EMM)	Email	Provided support for the recommendations, but emphasised need for on site activities. AW responded, reiterated recommendation that on site activies be undertaken prior to ground disturbance and will be outlined in ACHMP.
21-Sep-21	Incoming	Didge Ngunawal Clan	Paul Boyd Lilly Carroll	Georgia Burnett (EMM) Alan Williams (EMM)	Email	Responded in support of the recommendations. AW acknowledged reciept.
29-Sep-21	Incoming	Corroboree Aboriginal Corporation	Marilyn Carroll-Johnson	Georgia Burnett (EMM)	Email	Responded in support of the recommendations. GB acknowledged reciept.
08-Oct-21	Outgoing	All RAPs	Georgia Burnett (EMM)	Various	Email	Reminder for closing of comment period for ACHA.
08-Oct-21	Incoming	Gunjeewong Aboriginal Corporation	Shayne Dickson	Georgia Burnett (EMM) Alan Williams (EMM)	Email	Responded in support of the recommendations. GB acknowledged reciept.
10-Oct-21	Incoming	Ngunawal Heritage Aboriginal Corporation	Dean Delponte	Georgia Burnett (EMM) Alan Williams (EMM)	Email	Responded in support of the recommendations, and emphasised ongoing engagment with Aboriginal stakeholders. GB acknowledged reciept.

B.2 List of identified Aboriginal stakeholders in the region

- Yurrandaali
- Barraby Cultural Services
- Ngunnawal Elders Corporation
- Pejar Local Aboriginal Land Council
- Buru Ngunawal Aboriginal Corporation
- Ngunnawal Elder
- Gundungurra Aboriginal Heritage Association Inc.
- Ngunawal Heritage Aboriginal Corporation
- Konanggo Aboriginal Cultural Heritage Services
- Yurwang Gundana Consultancy Cultural Heritage Services.
- King Brown Tribal Group
- Gunjeewong Cultural Heritage Aboriginal Corporation
- Yukkumbruk
- Corroboree Aboriginal Corporation
- Murri Bidgee Mullangari Aboriginal Corporation
- Nundagurri Aboriginal Corporation
- Walbunja
- Goobah Development Pty Ltd.
- Gunyuu
- Wullung
- Badu
- Yerramurra
- Jerringong
- Merrigarn Indigenous Corporation
- Wingikara

- Bilinga
- Munyunga
- Pemulwuy
- Karrial
- Didge Ngunawal clan
- Ginninderra Aboriginal Corporation
- Muragadi Heritage Indigenous Corporation
- Gundungurra Tribal Council Aboriginal Corporation
- Gundungurra Aboriginal Heritage Association Inc.
- THAUAIRA
- WALGALU
- Gadhu Dreaming
- Thunderstone Aboriginal Cultural and Land Management Services Aboriginal Corporation
- Duncan Falk Consultancy
- Thoorga Nura
- Janine Thompson
- Ngurambang
- Clorine Lyons
- Ngunawal Consultancy
- Oak Hill Enterprises
- Gilay Consultants
- Ngunawal Heritage Aboriginal Corporation
- Clive Freeman

B.3 List of registered Aboriginal parties following notification

- Pejar Local Aboriginal Lands Council
- Didge Ngunawal Clan
- Ginninderra Aboriginal Corporation
- Corroboree Aboriginal Corporation
- Muragadi
- Konanggo Aboriginal Cultural Heritage Services
- Ngunnawal Elders Corporation
- Yurwang Gundana Cultural Heritage Services
- Yurwang Gundana Cultural Heritage Services
- Ngunawal Heritage Aboriginal Corporation
- Woka Aboriginal Corporation
- Freeman & Marx Pty Ltd
- Yurrandaali Cultural Services
- Thunderstone Aboriginal Cultural Services Pty Ltd
- Gunjeewong Aboriginal Corporaton

B.4 Stage 1 – Notification and registration

28 May 2021

Ground floor, 20 Chandos Street
St Leonards NSW 2065
PO Box 21
St Leonards NSW 1590

T 02 9493 9500
E info@emmconsulting.com.au

www.emmconsulting.com.au

Re: Woodlawn Energy Recovery Facility- Aboriginal cultural heritage assessment - Request for information on local Aboriginal stakeholders.

To whom it may concern,

EMM Consulting Pty Ltd (EMM Heritage) has been commissioned by Veolia to undertake an Aboriginal Cultural Heritage Assessment (ACHA) for the proposed establishment of the Woodlawn Advanced Energy Recovery Facility (ARC). The development will generate clean energy from the combustion of non-recyclable waste, with works including the construction of a large compound and new roads alongside the existing substation at the existing Woodlawn Eco Precinct, at 619 Collector Road, Tarago, NSW 2580. The proposed development will involve extensive earthworks, levelling, drilling and piling works. The aim of the study is to inform the cultural heritage of the impact footprint, and to develop an Aboriginal Heritage Impact Permit (AHIP) to allow the works to proceed (where required).

The proponent is Veolia, and the project contact is Christine Hodgkiss, State Manager Resource Recovery, Level 4, 65 Pirrama Road, Pyrmont, NSW 2009; T: 1800 313 096; E: thearc@veolia.com

In accordance with NSW State government's *Aboriginal cultural heritage consultation requirements for proponents 2010*, I am writing to you to seek information on relevant Aboriginal individuals and/or communities that you are aware of in the region, and who may hold cultural knowledge and/or information about Aboriginal objects and sites in the vicinity. Could you please provide me with this information as soon as possible at the Sydney address above, or gburnett@emmconsulting.com.au.

If you have any questions or enquiries, please do not hesitate to contact me on 02 9493 9500.

Yours sincerely

G. Burnett

Georgia Burnett
Archaeologist
gburnett@emmconsulting.com.au

Abby Gils

From: PlanningEnquiries <PlanningEnquiries@goulburn.nsw.gov.au>
Sent: Monday, June 7, 2021 2:52 PM
To: Georgia Burnett
Subject: RE: Woodlawn Energy Recovery Facility - Request for information on local Aboriginal stakeholders

CAUTION: This email originated outside of the Organisation.

Good afternoon Georgia,

Thank you for your email and apologies for the delay in responding.

Please see below contact information which may be of assistance:

PEJAR LOCAL ABORIGINAL LAND COUNCIL (PLALC)

Contact Officer	Delise Freeman
Title	CEO
Address Postal	Pejar Local Aboriginal Land Council PO Box 289 Goulburn NSW 2580
Address Physical	Pejar Local Aboriginal Land Council 80 Combermere Street Goulburn NSW 2580
Phone Direct line:	[redacted]
Email	[redacted]

[redacted]

Kind regards,
Emily

Emily Todkill
Development Liaison Officer
T: 02 4823 4422
Goulburn Mulwaree Council Locked Bag 22 Goulburn NSW 2580 | Connect on Facebook



From: Georgia Burnett [mailto:gburnett@emmconsulting.com.au]
Sent: Friday, 28 May 2021 2:23 PM
To: Council <Council@goulburn.nsw.gov.au>
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: Woodlawn Energy Recovery Facility - Request for information on local Aboriginal stakeholders

To whom it may concern,

EMM Consulting Pty Ltd is undertaking an Aboriginal cultural heritage assessment of the proposed establishment of the Woodlawn Energy Recovery Facility (WERF), a combined waste management and energy generation facility at the existing Woodlawn Eco Precinct at 619 Collector Road, Tarago, NSW 2580. The proposed development will involve extensive earthworks, levelling, drilling and piling works. A letter attached provides further information.

I am writing to request contact information for local Aboriginal people you may be aware of who would be interested in registering interest in the project, in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*.

Please let me know if I can provide any further information to assist you.

Kind regards,
Georgia

Georgia Burnett
Archaeologist
Bushfire, Ecology, Heritage and Spatial Solutions
EMM creating opportunities
T 02 9493 9500
M 0400 472 412
Connect with us
SYDNEY | Ground floor, 20 Chandos Street, St Leonards NSW 2065

Please consider the environment before printing my email.
This email and any files transmitted with it are confidential and are only to be read or used by the intended recipient as it may contain confidential information. Confidentiality or privilege is not waived or lost by erroneous transmission. If you have received this email in error, or are not the intended recipient, please notify the sender immediately and delete this email from your computer. You must not disclose, distribute, copy or use the information herein if you are not the intended recipient.

Abby Gils

From: Barry Gunther <Barry.Gunther@environment.nsw.gov.au>
Sent: Monday, May 31, 2021 10:41 AM
To: Georgia Burnett
Subject: Woodlawn Eco Precinct, at 619 Collector Road, Tarago Woodlawn Advanced Energy Recovery Facility (ARC) - Goulburn Mulwaree Local Government Area.
Attachments: Attachment A - DPC RAP list - Goulburn Mulwaree Local Government Area.docx; RAP list request Woodlawn Eco Precinct, at 619 Collector Road, Tarago Woodlawn Advanced Energy Recovery Facility (ARC).docx; J200931_WERF_AgencyRequest_20210528.pdf

CAUTION: This email originated outside of the Organisation.

Hi Georgia,

Please find attached the DPC RAP list for the Woodlawn Eco Precinct, at 619 Collector Road, Tarago Woodlawn Advanced Energy Recovery Facility (ARC) - Goulburn Mulwaree Local Government Area.

regards

Barry Gunther, Aboriginal Heritage Planner Officer
Heritage NSW, Community Engagement, Department of Premier and Cabinet
Level 6, 10 Valentine Ave, Parramatta | Locked Bag 5020 Parramatta 2124
T: 02 9995 6830 | barry.gunther @environmrnt.nsw.gov.au

Please lodge all Applications to Heritagemailbox@environment.nsw.gov.au

The Heritage Management System is live from 31 May. More information is available here

I acknowledge and respect the traditional custodians and ancestors of the lands I work across.

Heritage NSW and coronavirus (COVID-19)
Heritage NSW has taken steps to protect the safety, health and wellbeing of our staff, communities and customers. Whilst our offices remain open, we have put in place flexible working arrangements for our teams across NSW and continue to adapt our working arrangements as necessary. Face-to-face meetings and field work/site visits with our customers are subject to rules on gatherings and social distancing measures. We thank you for your patience and understanding at this time.

This email is intended for the addressee(s) named and may contain confidential and/or privileged information.
If you are not the intended recipient, please notify the sender and then delete it immediately.
Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

LIST OF ABORIGINAL STAKEHOLDERS FOR THE DEPARTMENT of PREMIER and CABINET (DPC) SOUTHERN REGION HELD BY DPC FOR THE PURPOSES OF THE OEH *ABORIGINAL CULTURAL HERITAGE CONSULTATION REQUIREMENTS FOR PROPONENTS 2010*

These lists are provided to proponents in accordance with section 4.1.2 of the *Aboriginal Cultural Heritage Consultation Requirements* for *Proponents 2010* (the "Consultation Requirements") which commenced on 12 April 2010.

The consultation process involves getting the views of, and information from, Aboriginal people and reporting on these. It is not to be confused with other field assessment processes involved in preparing a proposal and an application. Consultation does not include the employment of Aboriginal people to assist in field assessment and/or site monitoring. Aboriginal people may provide services to proponents through a contractual arrangement however, this is separate from consultation. The proponent is not obliged to employ those Aboriginal people registered for consultation. Consultation as per these requirements will continue irrespective of potential or actual employment opportunities for Aboriginal people.

A copy of the Consultation Requirements can be found on the OEH website at:
http://www.environment.nsw.gov.au/resources/cultureheritage/commconsultation/09781ACHconsultreq.pdf.

Under the Consultation Requirements; a proponent is required to provide Aboriginal people who may hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and/or places as relevant to the proposed project area, with an opportunity to be involved in consultation. Section 3.3.1 of the Consultation Requirements states that Aboriginal people who can provide this information are, based on Aboriginal lore and custom, the traditional owners or custodians of the land that is the subject of the proposed project.

The Consultation Requirements also state that:

> *Traditional owners or custodians with appropriate cultural heritage knowledge to inform decision making who seek to register their interest as an Aboriginal party are those people who:*
> - *continue to maintain a deep respect for their ancestral belief system, traditional lore and custom*
> - *recognise their responsibilities and obligations to protect and conserve their culture and heritage and care for their traditional lands or Country*
> - *have the trust of their community, knowledge and understanding of their culture, and permission to speak about it.*

Please note: the placement of an organisation's name on any OEH Aboriginal stakeholder list for the Consultation Requirements does not override a proponent's requirement to also advertise in the local newspaper and to seek from other sources the names of any other Aboriginal people who may hold cultural knowledge as required under clause 60 of the National Parks and Wildlife Regulation 2019.

How to use this list

1. **Contact the organisations/individuals who have indicated an interest in the relevant LGA/s and invite them to register an interest in your project**

Table of organisations redacted

Our reference: Doc21/439189

Georgia Burnett
Archaeologist
EMM Consulting
Ground floor, 20 Chandos Street
St Leonards NSW 2065

25/05/2021

Dear Georgia,

WRITTEN NOTIFICATION OF PROPOSAL AS REQUIRED UNDER DECCW ABORIGINAL CULTURAL HERITAGE CONSULTATION REQUIREMENTS FOR PROPONENTS 2010

Subject: Woodlawn Eco Precinct, at 619 Collector Road, Tarago Woodlawn Advanced Energy Recovery Facility (ARC).

Thank you for your correspondence dated 28 May 2021 to Heritage NSW (Department of Premier and Cabinet) regarding the above project.

Attached is a list of known Aboriginal parties for the proposed development at Goulburn Mulwaree Local Government Area that Heritage NSW considers likely to have an interest in the activity.

Please note this list is not necessarily an exhaustive list of all interested Aboriginal parties.

Receipt of this list does not remove the requirement of a proponent/ consultant to advertise in local print media and contact other bodies seeking interested Aboriginal parties, in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (April 2010).

Under Section 4.1.6. of the Consultation Requirements, you must also provide a copy of the names of each Aboriginal person who registered an interest to the relevant Heritage NSW office and Local Aboriginal Land Council (LALC) within 28 days from the closing date for registering an interest.

Please note that the contact details in the list provided by Heritage NSW may be out of date as it relies on Aboriginal parties advising Heritage NSW when their details need changing. If individuals/companies undertaking consultation are aware that any groups contact details are out of date, or letters are returned unopened, please contact either the relevant stakeholder group (if you know their more current details) and/or Heritage NSW. AHIP applicants should make a note of any group they are unable to contact as part of their consultation record.

If you have any questions about this advice, please email: heritagemailbox@environment.nsw.gov.au or contact (02) 9873 8500.

Yours sincerely



Barry Gunther
Aboriginal Heritage Planner
Aboriginal Heritage Regulation Branch – South Heritage NSW

Attachment A:

Registered Aboriginal Interests DPC RAP List for the Goulburn Mulwaree Local Government Area.

28 May 2021

Ground floor, 20 Chandos Street
St Leonards NSW 2065
PO Box 21
St Leonards NSW 1590

T 02 9493 9500
E info@emmconsulting.com.au

www.emmconsulting.com.au

Re: Woodlawn Energy Recovery Facility- Aboriginal cultural heritage assessment - Request for information on local Aboriginal stakeholders.

To whom it may concern,

EMM Consulting Pty Ltd (EMM Heritage) has been commissioned by Veolia to undertake an Aboriginal Cultural Heritage Assessment (ACHA) for the proposed establishment of the Woodlawn Advanced Energy Recovery Facility (ARC). The development will generate clean energy from the combustion of non-recyclable waste, with works including the construction of a large compound and new roads alongside the existing substation at the existing Woodlawn Eco Precinct, at 619 Collector Road, Tarago, NSW 2580. The proposed development will involve extensive earthworks, levelling, drilling and piling works. The aim of the study is to inform the cultural heritage of the impact footprint, and to develop an Aboriginal Heritage Impact Permit (AHIP) to allow the works to proceed (where required).

The proponent is Veolia, and the project contact is Christine Hodgkiss, State Manager Resource Recovery, Level 4, 65 Pirrama Road, Pyrmont, NSW 2009; T: 1800 313 096; E: thearc@veolia.com

In accordance with NSW State government's *Aboriginal cultural heritage consultation requirements for proponents 2010*, I am writing to you to seek information on relevant Aboriginal individuals and/or communities that you are aware of in the region, and who may hold cultural knowledge and/or information about Aboriginal objects and sites in the vicinity. Could you please provide me with this information as soon as possible at the Sydney address above, or gburnett@emmconsulting.com.au.

If you have any questions or enquiries, please do not hesitate to contact me on 02 9493 9500.

Yours sincerely

G. Burnett

Georgia Burnett
Archaeologist
gburnett@emmconsulting.com.au

Our reference: Doc21/439189

Georgia Burnett
Archaeologist
EMM Consulting
Ground floor, 20 Chandos Street
St Leonards NSW 2065

25/05/2021

Dear Georgia,

WRITTEN NOTIFICATION OF PROPOSAL AS REQUIRED UNDER DECCW ABORIGINAL CULTURAL HERITAGE CONSULTATION REQUIREMENTS FOR PROPONENTS 2010

Subject: Woodlawn Eco Precinct, at 619 Collector Road, Tarago Woodlawn Advanced Energy Recovery Facility (ARC).

Thank you for your correspondence dated 28 May 2021 to Heritage NSW (Department of Premier and Cabinet) regarding the above project.

Attached is a list of known Aboriginal parties for the proposed development at Goulburn Mulwaree Local Government Area that Heritage NSW considers likely to have an interest in the activity.

Please note this list is not necessarily an exhaustive list of all interested Aboriginal parties.

Receipt of this list does not remove the requirement of a proponent/ consultant to advertise in local print media and contact other bodies seeking interested Aboriginal parties, in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (April 2010).

Under Section 4.1.6. of the Consultation Requirements, you must also provide a copy of the names of each Aboriginal person who registered an interest to the relevant Heritage NSW office and Local Aboriginal Land Council (LALC) within 28 days from the closing date for registering an interest.

Please note that the contact details in the list provided by Heritage NSW may be out of date as it relies on Aboriginal parties advising Heritage NSW when their details need changing. If individuals/companies undertaking consultation are aware that any groups contact details are out of date, or letters are returned unopened, please contact either the relevant stakeholder group (if you know their more current details) and/or Heritage NSW. AHIP applicants should make a note of any group they are unable to contact as part of their consultation record.

If you have any questions about this advice, please email: heritagemailbox@environment.nsw.gov.au or contact (02) 9873 8500.

Yours sincerely



Barry Gunther
Aboriginal Heritage Planner
Aboriginal Heritage Regulation Branch – South Heritage NSW

Attachment A:

Registered Aboriginal Interests DPC RAP List for the Goulburn Mulwaree Local Government Area.

Ground floor, 20 Chandos Street
St Leonards NSW 2065
PO Box 21
St Leonards NSW 1590

T 02 9493 9500
E info@emmconsulting.com.au

www.emmconsulting.com.au

9 June 2021

Re: Invitation for Registrations of Interest – Aboriginal Cultural Heritage – Woodlawn Advanced Energy Recovery Facility

Dear Sir/Madam,

Veolia is proposing to establish the Woodlawn Advanced Energy Recovery Facility (ARC) at the existing Woodlawn Eco Precinct in Tarago, NSW (Figure 1.1). The development will generate clean energy from the combustion of non-recyclable waste, with works including the construction of a large compound and new roads alongside the existing substation at the existing Woodlawn Eco Precinct, at 619 Collector Road, Tarago, NSW 2580. These activities will involve extensive earthworks, levelling, drilling and piling works. EMM Consulting Pty Ltd (EMM) is undertaking an Aboriginal cultural heritage assessment to identify the presence of any Aboriginal heritage values, and support Veolia to avoid and minimise impacts to Aboriginal heritage as a result of the proposed construction.

The proponent is Veolia, and the project contact is Christine Hodgkiss, Project Director, Level 4, 65 Pirrama Road, Pyrmont, NSW 2009; T: 1800 313 096; E: thearc@veolia.com

This project is being undertaken in accordance with NSW State government's *Aboriginal cultural heritage consultation requirements for proponents 2010*. As per the first stage of the NSW State government consultation guidelines, I am writing to notify you of the project and seeking you and/or your organisation's interest in being registered for subsequent consultation and involvement. We are interested in Aboriginal individuals and/or organisations who may hold relevant cultural knowledge for determining the Aboriginal cultural heritage of the area, and who wish to be involved in the project.

The purpose of consultation is to assist the proponent to:

1. Assess the Aboriginal heritage values of the area.

2. Assist NSW Government in the assessment of Aboriginal heritage reports prepared for this project.

3. Support any future applications or approvals for the project sought under *Environmental Planning and Assessment Act 1979* and/or *National Parks and Wildlife Act 1974*.

If you wish to register your interest as an Aboriginal party your registration must be in writing (letter or email). This information must be received by Georgia Burnett (see contact details below) by close of business **23 June 2021**.

> Georgia Burnett, EMM Consulting Pty Ltd, 20 Chandos Street, St Leonards, NSW 2065; T: 02 9493 9500; E: gburnett@emmconsulting.com.au

In your response, please provide the following information:

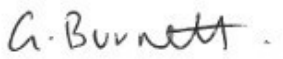
- clear identification of the individual and/or organisation registering an interest. Please ensure all contact details and personal, along with relevant phone, address and email (if available) is provided;

- preferred communication method (e.g. email) during the consultation of this project, along with your organisation's nominated contact person and their details;
- the level of project involvement you or your organisation wishes, including attendance of meetings, fieldwork participation and/or simply reviewing documentation;
- identification on any procedures, protocols or requirements for the use and reproduction of any cultural information or materials you or your organisation provides EMM Heritage as part of this project; and
- identification of any Aboriginal objects, sites and/or areas of cultural value that you are aware of in, or near, the project area.

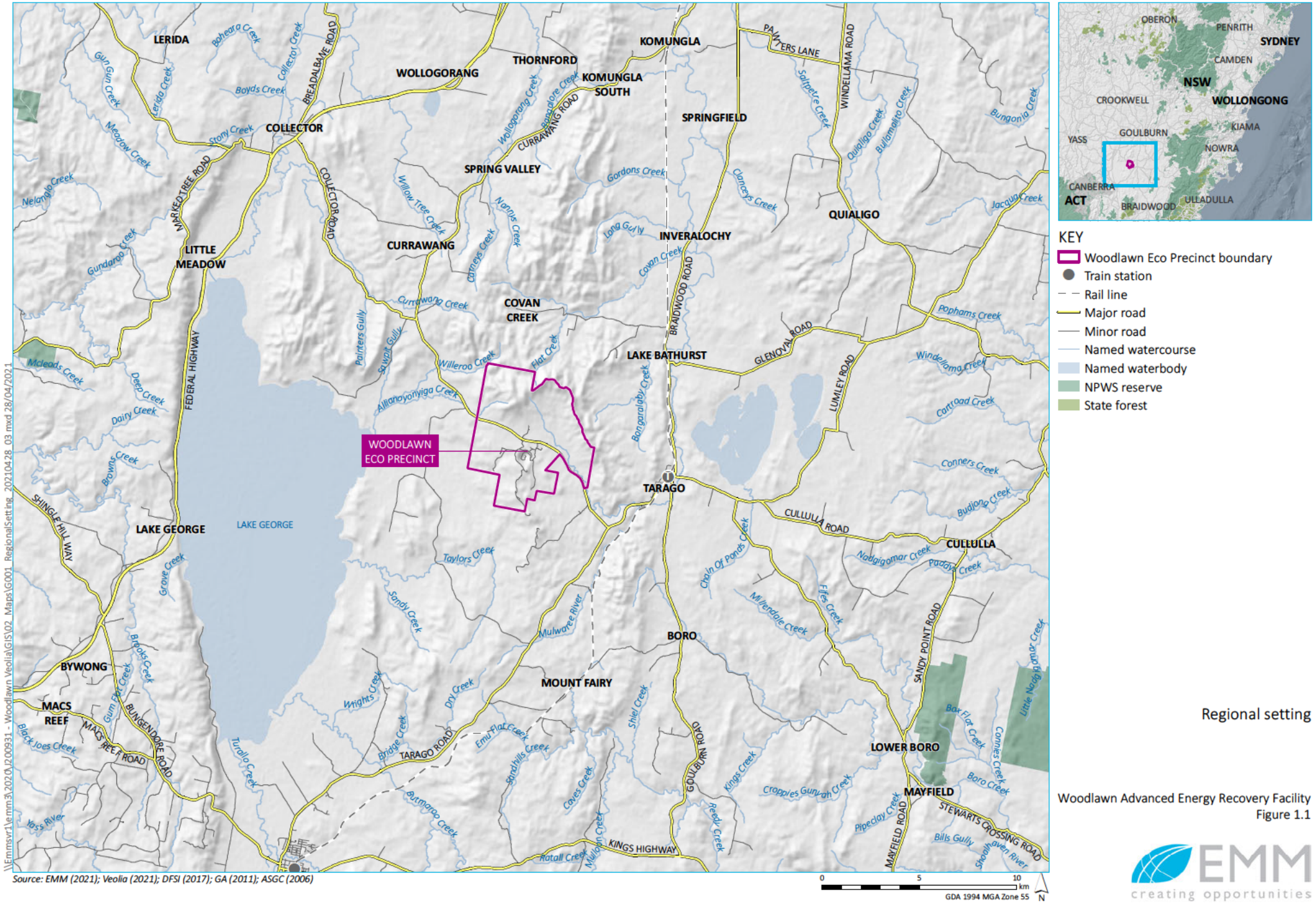
As required by the consultation guidelines, details of people registering as Aboriginal Parties will be forwarded to Heritage NSW and the relevant Local Aboriginal Land Council unless you specify otherwise in your response.

If you have any questions or enquiries, please don't hesitate to contact us.

Yours sincerely



Georgia Burnett
Archaeologist
gburnett@emmconsulting.com.au



KEY

- Woodlawn Eco Precinct boundary
- Train station
- Rail line
- Major road
- Minor road
- Named watercourse
- Named waterbody
- NPWS reserve
- State forest

Source: EMM (2021); Veolia (2021); DFSI (2017); GA (2011); ASGC (2006)

\\Emmsvr1\emm3\2020\J200931 - Woodlawn Veolia\GIS\02_Maps\G001_RegionalSetting_20210428_03.mxd 28/04/2021

Regional setting

Woodlawn Advanced Energy Recovery Facility
Figure 1.1

EMM
creating opportunities

Local champions for environment

BY NEHA ATTRE

AUSTRALIAN Conservation Foundation is starting a local group in Goulburn with a focus on the environment.

ACF community group leader in Goulburn, Elizabeth Grice, says the group will help raise funds for the non-political organisation.

"Our future projects would include approaching decision makers on behalf of the community over adverse environmental decisions.

"There was a time when we used to have koalas in the area and now that has changed. Unfortunately, the world is in what has been described by scientists as the 6th Great Extinction.

"The drought and the bushfires have probably heightened most people's awareness of the threat to our iconic species such as the koala, platypus, echidna, wallabies and kangaroos.

"We want to work on things like these and more that are a detriment to the local wildlife and create an environment that will help the future generations."



SHARING: Elizabeth Grice talks to pre-schoolers at Imaginations Early Education in Goulburn, raising awareness about the iconic animals in Australia. **Photo: Supplied.**

The organisation is holding a 'welcome' morning meeting on June 23 at Goulburn Worker's Club.

So far, the group in Goulburn, headed by Mrs Grice and her husband Roger, has eight members.

"It's a free event where we will share information about the Australian Conservation Foundation, current campaign priorities and volunteer opportunities in the Goulburn area with other like-minded people who are passionate about similar issues," Mrs Grice said.

The ACF has over 700,000 members throughout over 40 local community groups.

Members will also be at Parkside Market on June 12. For details, call Elizabeth on 0478087173 or email Goulburn789@yahoo.com.

Meals on Wheels call for volunteers

DO YOU want to give back to the community and help the elderly? Meals on Wheels is looking for volunteers.

Service manager Sharon Grummer said the charity was running low on volunteers to deliver meals.

The Goulburn service currently has 60 volunteers but needs closer to 95.

The organisation was five volunteers short on Monday, and faces similar shortages for the rest of the week.

Ms Grummer said most people only volunteered once a month, with some businesses around Goulburn signing the whole office up.

"We would like to get some new blood in," she said.

Shifts generally start at 11:15am and last for an hour. Hot meals, frozen meals, mini meals and soups are delivered to elderly residents throughout the region.

Meals on Wheels currently delivers to 56 clients in total throughout Goulburn.

Ms Grummer said the meals allowed "the elderly to maintain independence and live in their own home and not put strain on the health system".



HELP: Meals on Wheels Goulburn service manager Sharon Grummer with president Michael Parsons. **Photo: Hannah Neale**

She said it was a great way to give back to the community and "have a chat with the elderly".

Clients have to be over 65 years old or over 50 for Aboriginal or Torres Strait Islander peoples.

Additionally, Meals on Wheels has partnered with Pine O Cleen and Woolworths to distribute $50,000 hygiene packs nationwide. Each pack contains Glen 20 wipes, multi-purpose spray, disinfectant and a reusable bag.

Visit nswmealsonwheels.org.au for more information.

– HANNAH NEALE

GOLDSMITH STREET SURGERY
Dr Natalia Peker
is returning to work in Goulburn as a GP after 3 years away.
She has worked in Goulburn for 15 years.
Her interests are:
• Women's Health
• Children's Health
• Mental Health

Book Online
Same day Appointments
4855 0123
Monday to Friday 9am - 5pm
81 Goldsmith St, Goulburn
Dr Peker offers private billing.
RM6760552

INVITATION FOR REGISTRATIONS OF INTEREST
Aboriginal Cultural Heritage Assessment
Woodlawn Advanced Energy Recovery Facility, Goulburn Mulwaree LGA
Veolia is proposing the establishment of the Woodlawn Advanced Energy Recovery Facility (ARC) at the existing Woodlawn Eco Precinct, at 619 Collector Road, Tarago, NSW 2580. EMM is undertaking an Aboriginal cultural heritage assessment to inform the activity.
The proponent is Veolia, and the project contact is **Christine Hodgkiss, Project Director, Level 4, 65 Pirrama Road,Pyrmont, NSW 2009; T: 1800 313 096; E: thearc@veolia.com**
Registrations are invited from Aboriginal individuals and organisations who hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places in the area, and who wish to be involved in the consultation process undertaken as part of the assessment.
The purpose of consultation is to assist the proponent in; assessing the Aboriginal heritage values of the area, to assist NSW Government in the assessment of Aboriginal heritage reports prepared for this project, and to support any future applications or approvals for the project sought under Environmental Planning and Assessment Act 1979 and/or National Parks and Wildlife Act 1974.
Registrations of Interest should be provided by no later than 23 June 2021 to Georgia Burnett, EMM Consulting Pty Ltd, 20 Chandos Street, St Leonards, NSW 2065; T: 02 9493 9500; E: gburnett@emmconsulting.com.au.
VEOLIA

GOULBURN
68
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RM6715542

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www.austwidehomes.com.au
RM6573759

Abby Gils

From: Corrroboree Aboriginal Corporation [redacted]
Sent: Wednesday, June 9, 2021 4:56 PM
To: Georgia Burnett
Subject: Re: Registering Interest Woodlawn Energy Recovery Facility

CAUTION: This email originated outside of the Organisation.

Dear Georgia

Re: Registering Interest Woodlawn Energy Recovery Facility

Please register Corroboree Aboriginal Corporation. We have worked on projects as Cultural Heritage Officers in the project area. My family and other family members have lived in the area and family currently reside in the surrounding areas. We are registering in a full capacity. We are aboriginal people who are culturally & heritage aware. We have the necessary ability, experience, skills, insight and the knowledge to identify artefacts on field work. And as Aboriginal People we connect thru the land, thru our ancestors and our heritage. Therefore we are able participate on all levels. We have worked with many archaeologists across a broad landscape. We have consulted with most archeological companies over many years on projects. We have all the relevant insurances and safety gear. We are all fit, capable and adapt to a vast landscape.
Contact is preferred via email [redacted] *The* contact number, email and contact person is also listed in the signature.
Please do not disclose any of our details to LALC. We have responded for inclusion, to participate on all levels. Thanks.

Kind regards
Marilyn Carroll-Johnson
Director
Corroboree Aboriginal Corporation
[redacted]
Address: PO Box 3340
ROUSE HILL NSW 2155

On 9 Jun 2021, at 3:17 pm, Georgia Burnett <gburnett@emmconsulting.com.au> wrote:

Hi all,

I realised the date for responses was in error – it would be appreciated if you could indicate your interest by COB **Wednesday 23 June 2021.** Please find attached an amended letter.

Apologies for any inconvenience.

Kind regards,
Georgia

Georgia Burnett
Archaeologist

T 02 9493 9500
M 0400 472 412
www.emmconsulting.com.au

From: Georgia Burnett
Sent: Wednesday, 9 June 2021 2:58 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

Hi all,

On behalf of Veolia, EMM is beginning work on an Aboriginal cultural heritage assessment for proposed developments at the existing Woodlawn Eco Precinct in Tarago, NSW. As part of the process, we are following the Heritage NSW community consultation requirements.

At this stage, I am enquiring to see if you would like to be involved in the project. Please see the attached letter for more detail. I would appreciate a response by COB **Wednesday 7 July 2021**.

In your response, to help us with management and communication, please provide all contact details including postal address, phone and e-mail. In additional, any information regarding the following is appreciated:

- preferred communication method (e.g. e-mail) to be used during consultation;
- the level of project involvement you or your organisation wishes, including attendance of meetings, fieldwork participation and/or simply reviewing documentation;
- identification of any procedures, protocols or requirements for the use and reproduction of any cultural information or materials you or your organisation provides EMM as part of this project; and
- identification of any Aboriginal objects, sites and/or areas of cultural value that you are aware of in, or near, the project area.

If you have any queries or concerns, please don't hesitate to contact me on (02) 9493 9500.

Kind regards,
Georgia

Georgia Burnett
Archaeologist
Bushfire, Ecology, Heritage and Spatial Solutions

T 02 9493 9500
M 0400 472 412

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<J200931_ARC Invitation to register_v2.pdf>

Abby Gils

From: lilly carroll [redacted]
Sent: Wednesday, June 9, 2021 5:02 PM
To: Georgia Burnett
Subject: Re: RE: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

CAUTION: This email originated outside of the Organisation.

Hi Georgia

DNCs preferred method is by email and the levelling of involvement is fieldwork participation please

Sent from Yahoo Mail for iPhone

On Wednesday, June 9, 2021, 4:18 pm, Lilly Carroll <didgengunawalclan@yahoo.com.au> wrote:

> Hi Georgia
>
> DNC would like to register an interest into Woodlawn Energy recovery facility project
>
> Kind regards
> Paul Boyd & Lilly Carroll
> Directors DNC
> [redacted]
>
> Sent from myMail for iOS
>
> Wednesday, 9 June 2021, 3:18 pm +1000 from Georgia Burnett <gburnett@emmconsulting.com.au>:
>
> Hi all,
>
> I realised the date for responses was in error – it would be appreciated if you could indicate your interest by COB **Wednesday 23 June 2021.** Please find attached an amended letter.
>
> Apologies for any inconvenience.
>
> Kind regards,
>
> Georgia

Georgia Burnett
Archaeologist

T 02 9493 9500

M 0400 472 412

www.emmconsulting.com.au

From: Georgia Burnett
Sent: Wednesday, 9 June 2021 2:58 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

Hi all,

On behalf of Veolia, EMM is beginning work on an Aboriginal cultural heritage assessment for proposed developments at the existing Woodlawn Eco Precinct in Tarago, NSW. As part of the process, we are following the Heritage NSW community consultation requirements.

At this stage, I am enquiring to see if you would like to be involved in the project. Please see the attached letter for more detail. I would appreciate a response by COB **Wednesday 7 July 2021**.

In your response, to help us with management and communication, please provide all contact details including postal address, phone and e-mail. In additional, any information regarding the following is appreciated:

- preferred communication method (e.g. e-mail) to be used during consultation;
- the level of project involvement you or your organisation wishes, including attendance of meetings, fieldwork participation and/or simply reviewing documentation;

- identification of any procedures, protocols or requirements for the use and reproduction of any cultural information or materials you or your organisation provides EMM as part of this project; and
- identification of any Aboriginal objects, sites and/or areas of cultural value that you are aware of in, or near, the project area.

If you have any queries or concerns, please don't hesitate to contact me on (02) 9493 9500.

Kind regards,

Georgia

Georgia Burnett
Archaeologist

Bushfire, Ecology, Heritage and Spatial Solutions

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T 02 9493 9500

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Abby Gils

From: Ginninderra Aboriginal Corporation [redacted] >
Sent: Wednesday, June 9, 2021 4:46 PM
To: Georgia Burnett
Subject: Re: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

CAUTION: This email originated outside of the Organisation.

Hi Georgia,

Thank you for your email.

Please register Ginninderra Aboriginal Corporation for the above mentioned project. We have several site officers with cultural connections to the area, and as such would like to be involved in all aspects of the project.

All of our site officers have their white cards/insurances, and have extensive experience in surveys, excavations, sieving and recording of archaeological information.

We prefer to be contacted by email on [redacted]. The postal address for Ginninderra AC is Po box 3143 Grose Vale NSW 2753.

I myself will be the contact, and my mobile number is [redacted]

Please let me know if there is anything else you require.

Kind regards,

Krystle Carroll-Elliott

Ginninderra Aboriginal Corporation

M [redacted]

E: [redacted]

We acknowledge the Traditional Owners of Country throughout Australia and recognise their connection to land, water, and community.

We pay our respects to them, their cultures, and to Elders past and present.

On 9 Jun 2021, at 3:18 pm, Georgia Burnett <gburnett@emmconsulting.com.au> wrote:

Hi all,

I realised the date for responses was in error – it would be appreciated if you could indicate your interest by COB **Wednesday 23 June 2021.** Please find attached an amended letter.

Apologies for any inconvenience.

Kind regards,
Georgia

Georgia Burnett
Archaeologist

T 02 9493 9500
M 0400 472 412
www.emmconsulting.com.au

From: Georgia Burnett
Sent: Wednesday, 9 June 2021 2:58 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

Hi all,

On behalf of Veolia, EMM is beginning work on an Aboriginal cultural heritage assessment for proposed developments at the existing Woodlawn Eco Precinct in Tarago, NSW. As part of the process, we are following the Heritage NSW community consultation requirements.

At this stage, I am enquiring to see if you would like to be involved in the project. Please see the attached letter for more detail. I would appreciate a response by COB **Wednesday 7 July 2021**.

In your response, to help us with management and communication, please provide all contact details including postal address, phone and e-mail. In additional, any information regarding the following is appreciated:

- preferred communication method (e.g. e-mail) to be used during consultation;

- the level of project involvement you or your organisation wishes, including attendance of meetings, fieldwork participation and/or simply reviewing documentation;
- identification of any procedures, protocols or requirements for the use and reproduction of any cultural information or materials you or your organisation provides EMM as part of this project; and
- identification of any Aboriginal objects, sites and/or areas of cultural value that you are aware of in, or near, the project area.

If you have any queries or concerns, please don't hesitate to contact me on (02) 9493 9500.

Kind regards,
Georgia

Georgia Burnett
Archaeologist
Bushfire, Ecology, Heritage and Spatial Solutions

T 02 9493 9500
M 0400 472 412

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<J200931_ARC Invitation to register_v2.pdf>

Abby Gils

From: jesse johnson [redacted] >
Sent: Thursday, June 10, 2021 12:15 PM
To: Georgia Burnett
Subject: Re: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

CAUTION: This email originated outside of the Organisation.

Hi George
Please register our corporation for the above project. We have been doing aboriginal cultural heritage projects for over 26 years
Thanks
Jesse Johnson

On 9 Jun 2021, at 3:18 pm, Georgia Burnett <gburnett@emmconsulting.com.au> wrote:

Hi all,

I realised the date for responses was in error – it would be appreciated if you could indicate your interest by COB **Wednesday 23 June 2021.** Please find attached an amended letter.

Apologies for any inconvenience.

Kind regards,
Georgia

Georgia Burnett
Archaeologist

T 02 9493 9500
M 0400 472 412
www.emmconsulting.com.au

From: Georgia Burnett
Sent: Wednesday, 9 June 2021 2:58 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

Hi all,

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At this stage, I am enquiring to see if you would like to be involved in the project. Please see the attached letter for more detail. I would appreciate a response by COB **Wednesday 7 July 2021.**

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<J200931_ARC Invitation to register_v2.pdf>

Abby Gils

From: robert young [redacted]
Sent: Friday, June 11, 2021 11:38 AM
To: Georgia Burnett
Subject: Re: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

CAUTION: This email originated outside of the Organisation.

Hi Georgia,

I would like to register my expression of interest as a Ngunawal traditional owner descendant, I have cultural links and cultural knowledge to this Country through my Mothers/Father's family from Yass and would like to participate to conduct the Aboriginal Cultural Heritage Assessment for the construction of the Woodlawn Energy Recovery Facility and have cultural knowledge of this area

Any questions dont hesitate to contact me via email or my mobile

Awaiting your reply

Kindest regards,
Robert Young
Principal Consultant
Konanggo Aboriginal Cultural Heritage Services
2/42 Crawford Road, Brighton Le Sands 2216 NSW
Email: [redacted]
Phone: [redacted]

From: Georgia Burnett <gburnett@emmconsulting.com.au>
Sent: Wednesday, 9 June 2021 3:17 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: RE: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

Hi all,

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Apologies for any inconvenience.

Kind regards,
Georgia

Georgia Burnett
Archaeologist

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M 0400 472 412
www.emmconsulting.com.au

From: Georgia Burnett
Sent: Wednesday, 9 June 2021 2:58 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

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In your response, to help us with management and communication, please provide all contact details including postal address, phone and e-mail. In additional, any information regarding the following is appreciated:

- preferred communication method (e.g. e-mail) to be used during consultation;
- the level of project involvement you or your organisation wishes, including attendance of meetings, fieldwork participation and/or simply reviewing documentation;
- identification of any procedures, protocols or requirements for the use and reproduction of any cultural information or materials you or your organisation provides EMM as part of this project; and
- identification of any Aboriginal objects, sites and/or areas of cultural value that you are aware of in, or near, the project area.

If you have any queries or concerns, please don't hesitate to contact me on (02) 9493 9500.

Kind regards,
Georgia

Georgia Burnett
Archaeologist
Bushfire, Ecology, Heritage and Spatial Solutions
EMM creating opportunities
T 02 9493 9500
M 0400 472 412
Connect with us
SYDNEY | Ground floor, 20 Chandos Street, St Leonards NSW 2065

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Abby Gils

From: Arni Williams [redacted] >
Sent: Thursday, June 17, 2021 11:47 AM
To: Georgia Burnett
Subject: Re: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

CAUTION: This email originated outside of the Organisation.

Hi Georgia,

Thank you for your email.

I see you've moved to a new role and company; I hope this is all going well for you. I'm still trying to write the darn PhD - what a drain - but I'll get it done.

On behalf of Ngunnawal Elders Corporation, we wish to register our interests for consultation for the proposed developments at the existing Woodlawn Eco Precinct in Tarago, NSW. Based on the proposed study area, we concur that a thorough reconnaissance survey be undertaken with Aboriginal Stakeholders in order to identify sites of Aboriginal significance.

This is in line with Section 3.3.1 of the '*Aboriginal cultural heritage consultant requirements for proponents 2010*', which states that consultants should work with Aboriginal parties who 'recognise their responsibilities and obligations to protect and conserve their culture and heritage and care for their traditional lands or Country' p. 8.

In addition, the area holds importance as it is situated close to the boundary of Kamberri (Walgalu)-Ngunnawal-Gundangara language groups, as well as sharing geographical connection with south coast Aboriginal groups, and is also located close to Weewara and Lake Bathurst which are of the utmost cultural importance with archaeological sequences dating back many millennia. Detailed records regarding the Aboriginal groups who occupied these areas, particularly Weereewa during the 19th century and later, can be found in Ann Jackson-Nakano's work "The Pajong" and "The Kamberri" which identifies descendants including our family and ancestors.

Please feel free to call if you would like to discuss anything with us further.

Both email and phone number are fine:

Address: 13 Fitzgibbon Place, Karabar NSW 2620

Phone number: [redacted]

Email: [redacted]

Kind regards,

Rob Williams
Ngunnawal Elders Corporation

On Wed, Jun 9, 2021 at 2:58 PM Georgia Burnett <gburnett@emmconsulting.com.au> wrote:

> Hi all,
>
> On behalf of Veolia, EMM is beginning work on an Aboriginal cultural heritage assessment for proposed developments at the existing Woodlawn Eco Precinct in Tarago, NSW. As part of the process, we are following the Heritage NSW community consultation requirements.
>
> At this stage, I am enquiring to see if you would like to be involved in the project. Please see the attached letter for more detail. I would appreciate a response by COB **Wednesday 7 July 2021**.
>
> In your response, to help us with management and communication, please provide all contact details including postal address, phone and e-mail. In additional, any information regarding the following is appreciated:
>
> - preferred communication method (e.g. e-mail) to be used during consultation;
> - the level of project involvement you or your organisation wishes, including attendance of meetings, fieldwork participation and/or simply reviewing documentation;
>
> - identification of any procedures, protocols or requirements for the use and reproduction of any cultural information or materials you or your organisation provides EMM as part of this project; and
> - identification of any Aboriginal objects, sites and/or areas of cultural value that you are aware of in, or near, the project area.
>
> If you have any queries or concerns, please don't hesitate to contact me on (02) 9493 9500.
>
> Kind regards,
>
> Georgia
>
> **Georgia Burnett**
> Archaeologist
>
> Bushfire, Ecology, Heritage and Spatial Solutions

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Abby Gils

From: yurwang gundana <[redacted]>
Sent: Thursday, June 17, 2021 3:56 PM
To: Georgia Burnett
Subject: Invitation for Registrations of Interest – Aboriginal Cultural Heritage – Woodlawn Advanced Energy Recovery Facility
Attachments: registration letter- woodlawn Advanced Engergy Recovery Facility.docx

CAUTION: This email originated outside of the Organisation.

Yurwang Gundana Cultural Heritage Services

ABN: 20741884763

Address of business: 11 Berger Road South Windsor NSW 2756
MOBILE: [redacted]
Email: [redacted]

17th of June 2021

RE: Re: Invitation for Registrations of Interest – Aboriginal Cultural Heritage – Woodlawn Advanced Energy Recovery Facility

Dear Georgia
in reference to above consultation, I wish to register as a Registered Aboriginal Party (RAP) as traditional owners of the land

Thanking you

Dean Bell
Consultant

Abby Gils

From: [redacted]
Sent: Friday, June 18, 2021 3:23 PM
To: Georgia Burnett
Cc: Alan Williams
Subject: Re: RE: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

CAUTION: This email originated outside of the Organisation.

Hi Georgia,

Thank you for your email.

Please be informed that we would like to register our interest in the Woodlands Energy Recovery Facility proposed developments.

We would also like to be involved at all levels of project involvement.

Our preferred method of communication is by email.

Please also note that we do not wish our details to be forwarded to the Local Aboriginal Land Council.

Kind Regards

Dean Delponte
Director
[redacted]

Ngunawal Heritage Aboriginal Corporation
ICN 4755

Sent from myMail for iOS

Wednesday, 9 June 2021, 3:18 pm +1000 from gburnett@emmconsulting.com.au <gburnett@emmconsulting.com.au>:

> Hi all,
>
> I realised the date for responses was in error – it would be appreciated if you could indicate your interest by COB **Wednesday 23 June 2021.** Please find attached an amended letter.
>
> Apologies for any inconvenience.

Kind regards,

Georgia

Georgia Burnett
Archaeologist

T 02 9493 9500

M 0400 472 412

www.emmconsulting.com.au

From: Georgia Burnett
Sent: Wednesday, 9 June 2021 2:58 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

Hi all,

On behalf of Veolia, EMM is beginning work on an Aboriginal cultural heritage assessment for proposed developments at the existing Woodlawn Eco Precinct in Tarago, NSW. As part of the process, we are following the Heritage NSW community consultation requirements.

At this stage, I am enquiring to see if you would like to be involved in the project. Please see the attached letter for more detail. I would appreciate a response by COB **Wednesday 7 July 2021**.

In your response, to help us with management and communication, please provide all contact details including postal address, phone and e-mail. In additional, any information regarding the following is appreciated:

- preferred communication method (e.g. e-mail) to be used during consultation;
- the level of project involvement you or your organisation wishes, including attendance of meetings, fieldwork participation and/or simply reviewing documentation;

- identification of any procedures, protocols or requirements for the use and reproduction of any cultural information or materials you or your organisation provides EMM as part of this project; and
- identification of any Aboriginal objects, sites and/or areas of cultural value that you are aware of in, or near, the project area.

If you have any queries or concerns, please don't hesitate to contact me on (02) 9493 9500.

Kind regards,

Georgia

Georgia Burnett
Archaeologist

Bushfire, Ecology, Heritage and Spatial Solutions

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Abby Gils

From: Steven Johnson [redacted] >
Sent: Sunday, June 20, 2021 7:35 PM
To: Georgia Burnett
Subject: Re: Registering Interest - Woodlawn Energy Recovery Facility

CAUTION: This email originated outside of the Organisation.

Woka Aboriginal Corporation
Preservation of Culture & Heritage
Mob: [redacted]
Email: [redacted]

20/6/21

Attention: Georgia

Re: Expressing Interest - Woodlawn Energy Recovery

Please register our corporation for full process on this project. We are aboriginal people. We are all Aboriginal Cultural Heritage Site Officers. We have our history & stories passed down to us. We have assisted in surveys, salvage & consulting in with archaeologists over a vast number of years. We are experienced in the field of identifying artefacts, Including our learned history and knowledge passed down. We appreciate the opportunity to be part of protecting and preserving our Aboriginal heritage. We are very proud of our heritage and culture passed to us by our Ancestors. We are therefore pleased with being a part of this research and provide our experience and knowledge.
Our organisation has a current Public liability insurance WHS compliant with all member's holding white cards and required PPE.
All our members are vastly experienced in the identification of Aboriginal artefacts and have worked with numerous Archeologists in surveys including Surveys,excavation/fieldwork. We are very passionate about land and conservation matters . We hold strong links to our our ancestors, our culture and our heritage.
Please note we do not want our details forwarded to LALC, please do not release our correspondence. Please register our Corporation name for this project.

Sincerely
Steve
Aboriginal Heritage Custodian
Mob: [redacted]
Email: [redacted]

Abby Gils

From: Clive Freeman [redacted]
Sent: Tuesday, June 22, 2021 10:44 PM
To: Georgia Burnett; Peter Markovic
Subject: Re: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

CAUTION: This email originated outside of the Organisation.

Hi Georgia,

Please accept this email as our registration. We are traditional owners and our family have come together to make the company Freeman&Marx Pty Ltd. we represent 6 highly trained and qualified sites officers and also carry out cultural induction training so that contractors are familiar with Aboriginal objects and so they understand appropriate behaviours while carrying out work.
In response to your points in your email please find my responses below.

- preferred communication method (e.g. e-mail) to be used during consultation;

[redacted]

- the level of project involvement you or your organisation wishes, including attendance of meetings, fieldwork participation and/or simply reviewing documentation;

All of the above as required. As identified in the above we have 6 trained officers. 3 male and 3 female.

- identification of any procedures, protocols or requirements for the use and reproduction of any cultural information or materials you or your organisation provides EMM as part of this project; and

We hold no limitations unless stipulated, all our information we share is for the intended use as indicated in each project. We provide unless stated otherwise the right for the cultural knowledge to be shared distributed and used for the purpose of the project.

- identification of any Aboriginal objects, sites and/or areas of cultural value that you are aware of in, or near, the project area.

We will provide this knowledge as the project progresses.

Hope this is ok let me know if you require anything further. We have full cover including $20mill liability, $1mill professional indemnity and workers cover. Please let me know if you don't have our current on file as they have all just been updated. If you don't I will send them through as needed.

Kind regards

Clive Freeman

Sent from my iPhone

On 9 Jun 2021, at 2:58 pm, Georgia Burnett <gburnett@emmconsulting.com.au> wrote:

- preferred communication method (e.g. e-mail) to be used during consultation;
- the level of project involvement you or your organisation wishes, including attendance of meetings, fieldwork participation and/or simply reviewing documentation;

- identification of any procedures, protocols or requirements for the use and reproduction of any cultural information or materials you or your organisation provides EMM as part of this project; and
- identification of any Aboriginal objects, sites and/or areas of cultural value that you are aware of in, or near, the project area.

Abby Gils

From: Bo Field [redacted]
Sent: Wednesday, June 23, 2021 10:14 AM
To: Georgia Burnett
Subject: Re: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

CAUTION: This email originated outside of the Organisation.

Dear Georgia

Yurrandaali would like to register for this project

Regards,

Bo Field - Manager
Yurrandaali Cultural Services
[redacted]

From: Georgia Burnett <gburnett@emmconsulting.com.au>
Sent: Wednesday, 9 June 2021 3:17 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: RE: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

Hi all,

I realised the date for responses was in error – it would be appreciated if you could indicate your interest by COB **Wednesday 23 June 2021.** Please find attached an amended letter.

Apologies for any inconvenience.

Kind regards,
Georgia

Georgia Burnett
Archaeologist

T 02 9493 9500
M 0400 472 412
www.emmconsulting.com.au

From: Georgia Burnett
Sent: Wednesday, 9 June 2021 2:58 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

Hi all,

On behalf of Veolia, EMM is beginning work on an Aboriginal cultural heritage assessment for proposed developments at the existing Woodlawn Eco Precinct in Tarago, NSW. As part of the process, we are following the Heritage NSW community consultation requirements.

At this stage, I am enquiring to see if you would like to be involved in the project. Please see the attached letter for more detail. I would appreciate a response by COB **Wednesday 7 July 2021**.

In your response, to help us with management and communication, please provide all contact details including postal address, phone and e-mail. In additional, any information regarding the following is appreciated:

- preferred communication method (e.g. e-mail) to be used during consultation;
- the level of project involvement you or your organisation wishes, including attendance of meetings, fieldwork participation and/or simply reviewing documentation;
- identification of any procedures, protocols or requirements for the use and reproduction of any cultural information or materials you or your organisation provides EMM as part of this project; and
- identification of any Aboriginal objects, sites and/or areas of cultural value that you are aware of in, or near, the project area.

If you have any queries or concerns, please don't hesitate to contact me on (02) 9493 9500.

Kind regards,
Georgia

Georgia Burnett
Archaeologist
Bushfire, Ecology, Heritage and Spatial Solutions
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Abby Gils

From: Tyronne & Bronwyn [redacted]
Sent: Wednesday, June 30, 2021 8:35 PM
To: Georgia Burnett
Subject: Re: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

CAUTION: This email originated outside of the Organisation.

Hi Georgia

I found your second email in the spam folder, I have surveyed Woodlawn including the windfarm and around Ngungara (Lake George) for many years.

In March we filmed the cultural stories of Ngungara which includes Woodlawn and region.

I totally understand if I have missed the cut off date to register. Any questions please do not hesitate to contact me on [redacted].

Kind regards

Tyronne

Tyronne & Bronwyn
Thunderstone Aboriginal Cultural Services Pty Ltd
PO Box 6900
Charnwood ACT 2615
[redacted]

2017 ACT NAIDOC 'Indigenous Business of the Year' Award Winner

On Wed, Jun 9, 2021 at 3:18 PM Georgia Burnett <gburnett@emmconsulting.com.au> wrote:

> Hi all,
>
> I realised the date for responses was in error – it would be appreciated if you could indicate your interest by COB **Wednesday 23 June 2021.** Please find attached an amended letter.
>
> Apologies for any inconvenience.
>
> Kind regards,
>
> Georgia

Georgia Burnett
Archaeologist

T 02 9493 9500

M 0400 472 412

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From: Georgia Burnett
Sent: Wednesday, 9 June 2021 2:58 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: Woodlawn Energy Recovery Facility - Invitation to register interest in Aboriginal Cultural Heritage Assessment

Hi all,

On behalf of Veolia, EMM is beginning work on an Aboriginal cultural heritage assessment for proposed developments at the existing Woodlawn Eco Precinct in Tarago, NSW. As part of the process, we are following the Heritage NSW community consultation requirements.

At this stage, I am enquiring to see if you would like to be involved in the project. Please see the attached letter for more detail. I would appreciate a response by COB **Wednesday 7 July 2021**.

In your response, to help us with management and communication, please provide all contact details including postal address, phone and e-mail. In additional, any information regarding the following is appreciated:

- preferred communication method (e.g. e-mail) to be used during consultation;
- the level of project involvement you or your organisation wishes, including attendance of meetings, fieldwork participation and/or simply reviewing documentation;

- identification of any procedures, protocols or requirements for the use and reproduction of any cultural information or materials you or your organisation provides EMM as part of this project; and
- identification of any Aboriginal objects, sites and/or areas of cultural value that you are aware of in, or near, the project area.

If you have any queries or concerns, please don't hesitate to contact me on (02) 9493 9500.

Kind regards,

Georgia

Georgia Burnett
Archaeologist

Bushfire, Ecology, Heritage and Spatial Solutions

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M 0400 472 412

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St Leonards NSW 2065
PO Box 21
St Leonards NSW 1590

T 02 9493 9500
E info@emmconsulting.com.au

www.emmconsulting.com.au

6 July 2021

Phil Purcell
Archaeologist
Heritage NSW, Department of Premier and Cabinet
Level 6, 10 Valentine Avenue
Parramatta NSW 2150

Re: Notification of registered Aboriginal parties - Woodlawn Eco Precinct

Dear Phil,

Veolia is proposing to establish the Woodlawn Advanced Energy Recovery Facility (ARC) at the existing Woodlawn Eco Precinct in Tarago, NSW. The development will generate clean energy from the combustion of non-recyclable waste, with works including the construction of a large compound and new roads alongside the existing substation at the existing Woodlawn Eco Precinct, at 619 Collector Road, Tarago, NSW 2580. These activities will involve extensive earthworks, levelling, drilling and piling works.

We are implementing the *Aboriginal cultural heritage consultation for requirements for proponents 2010.* In accordance with 4.1.6 of those requirements, we are providing a list of the 13 Aboriginal parties who have registered for consultation on the project. Please note three of these organisations requested their information be withheld from the relevant Local Aboriginal Land Council.

As per the consultation requirements, the Registered Aboriginal Parties can be found in Table 1 and the forms of notification are attached to this letter.

Table 1 List of Registered Aboriginal Parties.

Organisation	Contact
Pejar Local Aboriginal Lands Council	Delise Freeman
Didge Ngunawal Clan	Lilly Carrol
Ginninderra Aboriginal Corporation	Krystle Carroll-Elliott
Corroboree Aboriginal Corporation*	Marilyn Carroll-Johnson
Muragadi	Jesse Johnson
Konanggo Aboriginal Cultural Heritage Services	Robert Young
Ngunnawal Elders Corporation	Robert Williams
Yurwang Gundana Cultural Heritage Services	Dean Bell
Ngunawal Heritage Aboriginal Corporation*	Dean Delponte
Woka Aboriginal Corporation*	Steven Johnson
Freeman & Marx Pty Ltd	Clive Freeman & Peter Markovic
Thunderstone Aboriginal Cultural Services Pty Ltd	Tyronne Bell
Yurrandaali Cultural Services	Bo Field

Note: Organisations marked with a * requested their information be withheld from the relevant Local Aboriginal Land Council.

If you require further information, please do not hesitate to contact me.

Yours sincerely



Georgia Burnett
Archaeologist
gburnett@emmconsulting.com.au



INVITATION FOR REGISTRATIONS OF INTEREST

Aboriginal Cultural Heritage Assessment

Woodlawn Advanced Energy Recovery Facility, Goulburn Mulwaree LGA

Veolia is proposing the establishment of the Woodlawn Advanced Energy Recovery Facility (ARC) at the existing Woodlawn Eco Precinct, at 619 Collector Road, Tarago, NSW 2580. EMM is undertaking an Aboriginal cultural heritage assessment to inform the activity.

The proponent is Veolia, and the project contact is **Christine Hodgkiss, Project Director, Level 4, 65 Pirrama Road,Pyrmont, NSW 2009; T: 1800 313 096; E: thearc@veolia.com**

Registrations are invited from Aboriginal individuals and organisations who hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places in the area, and who wish to be involved in the consultation process undertaken as part of the assessment.

The purpose of consultation is to assist the proponent in; assessing the Aboriginal heritage values of the area, to assist NSW Government in the assessment of Aboriginal heritage reports prepared for this project, and to support any future applications or approvals for the project sought under Environmental Planning and Assessment Act 1979 and/or National Parks and Wildlife Act 1974.

Registrations of interest should be provided by no later than 23 June 2021 to Georgia Burnett, EMM Consulting Pty Ltd, 20 Chandos Street, St Leonards, NSW 2065; T: 02 9493 9500; E: gburnett@emmconsulting.com.au.

VEOLIA

Plate 1 Newspaper advertisement placed in the *Goulburn Post* on 9 June 2021.

Ground floor, 20 Chandos Street
St Leonards NSW 2065
PO Box 21
St Leonards NSW 1590

T 02 9493 9500
E info@emmconsulting.com.au

www.emmconsulting.com.au

9 June 2021

Re: Invitation for Registrations of Interest – Aboriginal Cultural Heritage – Woodlawn Advanced Energy Recovery Facility

Dear Sir/Madam,

Veolia is proposing to establish the Woodlawn Advanced Energy Recovery Facility (ARC) at the existing Woodlawn Eco Precinct in Tarago, NSW (Figure 1.1). The development will generate clean energy from the combustion of non-recyclable waste, with works including the construction of a large compound and new roads alongside the existing substation at the existing Woodlawn Eco Precinct, at 619 Collector Road, Tarago, NSW 2580. These activities will involve extensive earthworks, levelling, drilling and piling works. EMM Consulting Pty Ltd (EMM) is undertaking an Aboriginal cultural heritage assessment to identify the presence of any Aboriginal heritage values, and support Veolia to avoid and minimise impacts to Aboriginal heritage as a result of the proposed construction.

The proponent is Veolia, and the project contact is Christine Hodgkiss, Project Director, Level 4, 65 Pirrama Road, Pyrmont, NSW 2009; T: 1800 313 096; E: thearc@veolia.com

This project is being undertaken in accordance with NSW State government's *Aboriginal cultural heritage consultation requirements for proponents 2010*. As per the first stage of the NSW State government consultation guidelines, I am writing to notify you of the project and seeking you and/or your organisation's interest in being registered for subsequent consultation and involvement. We are interested in Aboriginal individuals and/or organisations who may hold relevant cultural knowledge for determining the Aboriginal cultural heritage of the area, and who wish to be involved in the project.

The purpose of consultation is to assist the proponent to:

1. Assess the Aboriginal heritage values of the area.

2. Assist NSW Government in the assessment of Aboriginal heritage reports prepared for this project.

3. Support any future applications or approvals for the project sought under *Environmental Planning and Assessment Act 1979* and/or *National Parks and Wildlife Act 1974*.

If you wish to register your interest as an Aboriginal party your registration must be in writing (letter or email). This information must be received by Georgia Burnett (see contact details below) by close of business **23 June 2021**.

> Georgia Burnett, EMM Consulting Pty Ltd, 20 Chandos Street, St Leonards, NSW 2065; T: 02 9493 9500; E: gburnett@emmconsulting.com.au

In your response, please provide the following information:

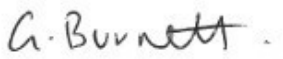
- clear identification of the individual and/or organisation registering an interest. Please ensure all contact details and personal, along with relevant phone, address and email (if available) is provided;

- preferred communication method (e.g. email) during the consultation of this project, along with your organisation's nominated contact person and their details;
- the level of project involvement you or your organisation wishes, including attendance of meetings, fieldwork participation and/or simply reviewing documentation;
- identification on any procedures, protocols or requirements for the use and reproduction of any cultural information or materials you or your organisation provides EMM Heritage as part of this project; and
- identification of any Aboriginal objects, sites and/or areas of cultural value that you are aware of in, or near, the project area.

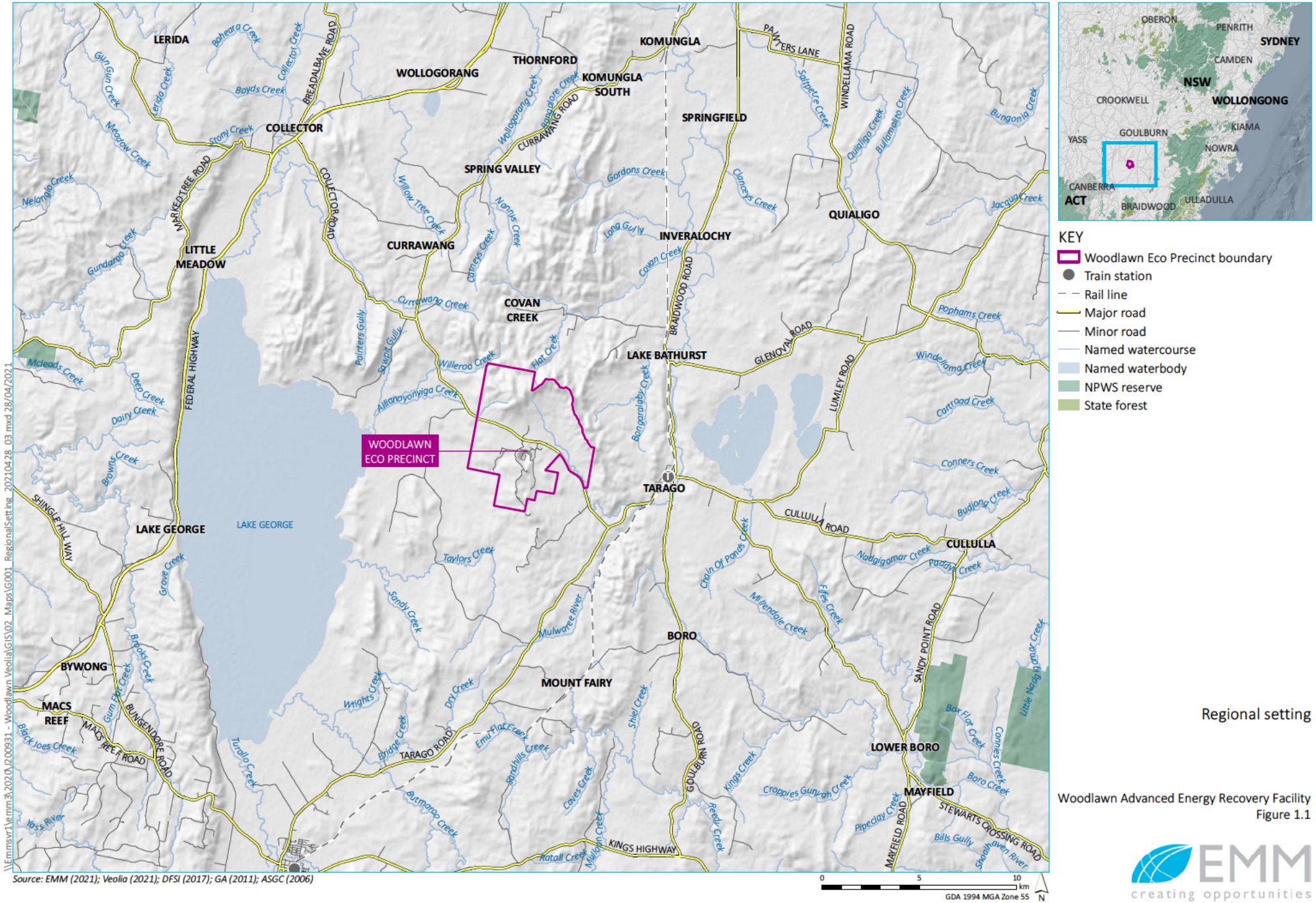
As required by the consultation guidelines, details of people registering as Aboriginal Parties will be forwarded to Heritage NSW and the relevant Local Aboriginal Land Council unless you specify otherwise in your response.

If you have any questions or enquiries, please don't hesitate to contact us.

Yours sincerely



Georgia Burnett
Archaeologist
gburnett@emmconsulting.com.au



KEY

- Woodlawn Eco Precinct boundary
- Train station
- Rail line
- Major road
- Minor road
- Named watercourse
- Named waterbody
- NPWS reserve
- State forest

Source: EMM (2021); Veolia (2021); DFSI (2017); GA (2011); ASGC (2006)

\\Emmsvr1\emm3\2020\J200931 - Woodlawn Veolia\GIS\02_Maps\G001_RegionalSetting_20210428_03.mxd 28/04/2021

Regional setting

Woodlawn Advanced Energy Recovery Facility
Figure 1.1

EMM
creating opportunities

Ground floor, 20 Chandos Street
St Leonards NSW 2065
PO Box 21
St Leonards NSW 1590

T 02 9493 9500
E info@emmconsulting.com.au

www.emmconsulting.com.au

6 July 2021

Delise Freeman
Pejar Local Aboriginal Land Council
80 Combermere Street
Goulburn NSW 2580

Re: Notification of registered Aboriginal parties - Woodlawn Eco Precinct

Dear Delise,

Veolia is proposing to establish the Woodlawn Advanced Energy Recovery Facility (ARC) at the existing Woodlawn Eco Precinct in Tarago, NSW. The development will generate clean energy from the combustion of non-recyclable waste, with works including the construction of a large compound and new roads alongside the existing substation at the existing Woodlawn Eco Precinct, at 619 Collector Road, Tarago, NSW 2580. These activities will involve extensive earthworks, levelling, drilling and piling works.

We are implementing the *Aboriginal cultural heritage consultation for requirements for proponents 2010.* In accordance with 4.1.6 of those requirements, we are providing a list of the 13 Aboriginal parties who have registered for consultation on the project. Please note three of these organisations requested their information be withheld from the relevant Local Aboriginal Land Council.

As per the consultation requirements, the Registered Aboriginal Parties can be found in Table 1 and the forms of notification are attached to this letter.

Table 1 List of Registered Aboriginal Parties.

Organisation	Contact
Pejar Local Aboriginal Lands Council	Delise Freeman
Didge Ngunawal Clan	Lilly Carrol
Ginninderra Aboriginal Corporation	Krystle Carroll-Elliott
[redacted]	[redacted]
Muragadi	Jesse Johnson
Konanggo Aboriginal Cultural Heritage Services	Robert Young
Ngunnawal Elders Corporation	Robert Williams
Yurwang Gundana Cultural Heritage Services	Dean Bell
[redacted]	[redacted]
[redacted]	[redacted]
Freeman & Marx Pty Ltd	Clive Freeman & Peter Markovic
Thunderstone Aboriginal Cultural Services Pty Ltd	Tyronne Bell
Yurrandaali Cultural Services	Bo Field

If you require further information, please do not hesitate to contact me.

Yours sincerely



Georgia Burnett
Archaeologist
gburnett@emmconsulting.com.au



INVITATION FOR REGISTRATIONS OF INTEREST

Aboriginal Cultural Heritage Assessment

Woodlawn Advanced Energy Recovery Facility, Goulburn Mulwaree LGA

Veolia is proposing the establishment of the Woodlawn Advanced Energy Recovery Facility (ARC) at the existing Woodlawn Eco Precinct, at 619 Collector Road, Tarago, NSW 2580. EMM is undertaking an Aboriginal cultural heritage assessment to inform the activity.

The proponent is Veolia, and the project contact is **Christine Hodgkiss, Project Director, Level 4, 65 Pirrama Road,Pyrmont, NSW 2009; T: 1800 313 096; E: thearc@veolia.com**

Registrations are invited from Aboriginal individuals and organisations who hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places in the area, and who wish to be involved in the consultation process undertaken as part of the assessment.

The purpose of consultation is to assist the proponent in; assessing the Aboriginal heritage values of the area, to assist NSW Government in the assessment of Aboriginal heritage reports prepared for this project, and to support any future applications or approvals for the project sought under Environmental Planning and Assessment Act 1979 and/or National Parks and Wildlife Act 1974.

Registrations of interest should be provided by no later than 23 June 2021 to Georgia Burnett, EMM Consulting Pty Ltd, 20 Chandos Street, St Leonards, NSW 2065; T: 02 9493 9500; E: gburnett@emmconsulting.com.au.

VEOLIA

Plate 1 Newspaper advertisement placed in the *Goulburn Post* on 9 June 2021.

Ground floor, 20 Chandos Street
St Leonards NSW 2065
PO Box 21
St Leonards NSW 1590

T 02 9493 9500
E info@emmconsulting.com.au

www.emmconsulting.com.au

9 June 2021

Re: Invitation for Registrations of Interest – Aboriginal Cultural Heritage – Woodlawn Advanced Energy Recovery Facility

Dear Sir/Madam,

Veolia is proposing to establish the Woodlawn Advanced Energy Recovery Facility (ARC) at the existing Woodlawn Eco Precinct in Tarago, NSW (Figure 1.1). The development will generate clean energy from the combustion of non-recyclable waste, with works including the construction of a large compound and new roads alongside the existing substation at the existing Woodlawn Eco Precinct, at 619 Collector Road, Tarago, NSW 2580. These activities will involve extensive earthworks, levelling, drilling and piling works. EMM Consulting Pty Ltd (EMM) is undertaking an Aboriginal cultural heritage assessment to identify the presence of any Aboriginal heritage values, and support Veolia to avoid and minimise impacts to Aboriginal heritage as a result of the proposed construction.

The proponent is Veolia, and the project contact is Christine Hodgkiss, Project Director, Level 4, 65 Pirrama Road, Pyrmont, NSW 2009; T: 1800 313 096; E: thearc@veolia.com

This project is being undertaken in accordance with NSW State government's *Aboriginal cultural heritage consultation requirements for proponents 2010*. As per the first stage of the NSW State government consultation guidelines, I am writing to notify you of the project and seeking you and/or your organisation's interest in being registered for subsequent consultation and involvement. We are interested in Aboriginal individuals and/or organisations who may hold relevant cultural knowledge for determining the Aboriginal cultural heritage of the area, and who wish to be involved in the project.

The purpose of consultation is to assist the proponent to:

1. Assess the Aboriginal heritage values of the area.

2. Assist NSW Government in the assessment of Aboriginal heritage reports prepared for this project.

3. Support any future applications or approvals for the project sought under *Environmental Planning and Assessment Act 1979* and/or *National Parks and Wildlife Act 1974*.

If you wish to register your interest as an Aboriginal party your registration must be in writing (letter or email). This information must be received by Georgia Burnett (see contact details below) by close of business **23 June 2021**.

> Georgia Burnett, EMM Consulting Pty Ltd, 20 Chandos Street, St Leonards, NSW 2065; T: 02 9493 9500; E: gburnett@emmconsulting.com.au

In your response, please provide the following information:

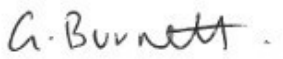
- clear identification of the individual and/or organisation registering an interest. Please ensure all contact details and personal, along with relevant phone, address and email (if available) is provided;

- preferred communication method (e.g. email) during the consultation of this project, along with your organisation's nominated contact person and their details;
- the level of project involvement you or your organisation wishes, including attendance of meetings, fieldwork participation and/or simply reviewing documentation;
- identification on any procedures, protocols or requirements for the use and reproduction of any cultural information or materials you or your organisation provides EMM Heritage as part of this project; and
- identification of any Aboriginal objects, sites and/or areas of cultural value that you are aware of in, or near, the project area.

As required by the consultation guidelines, details of people registering as Aboriginal Parties will be forwarded to Heritage NSW and the relevant Local Aboriginal Land Council unless you specify otherwise in your response.

If you have any questions or enquiries, please don't hesitate to contact us.

Yours sincerely



Georgia Burnett
Archaeologist
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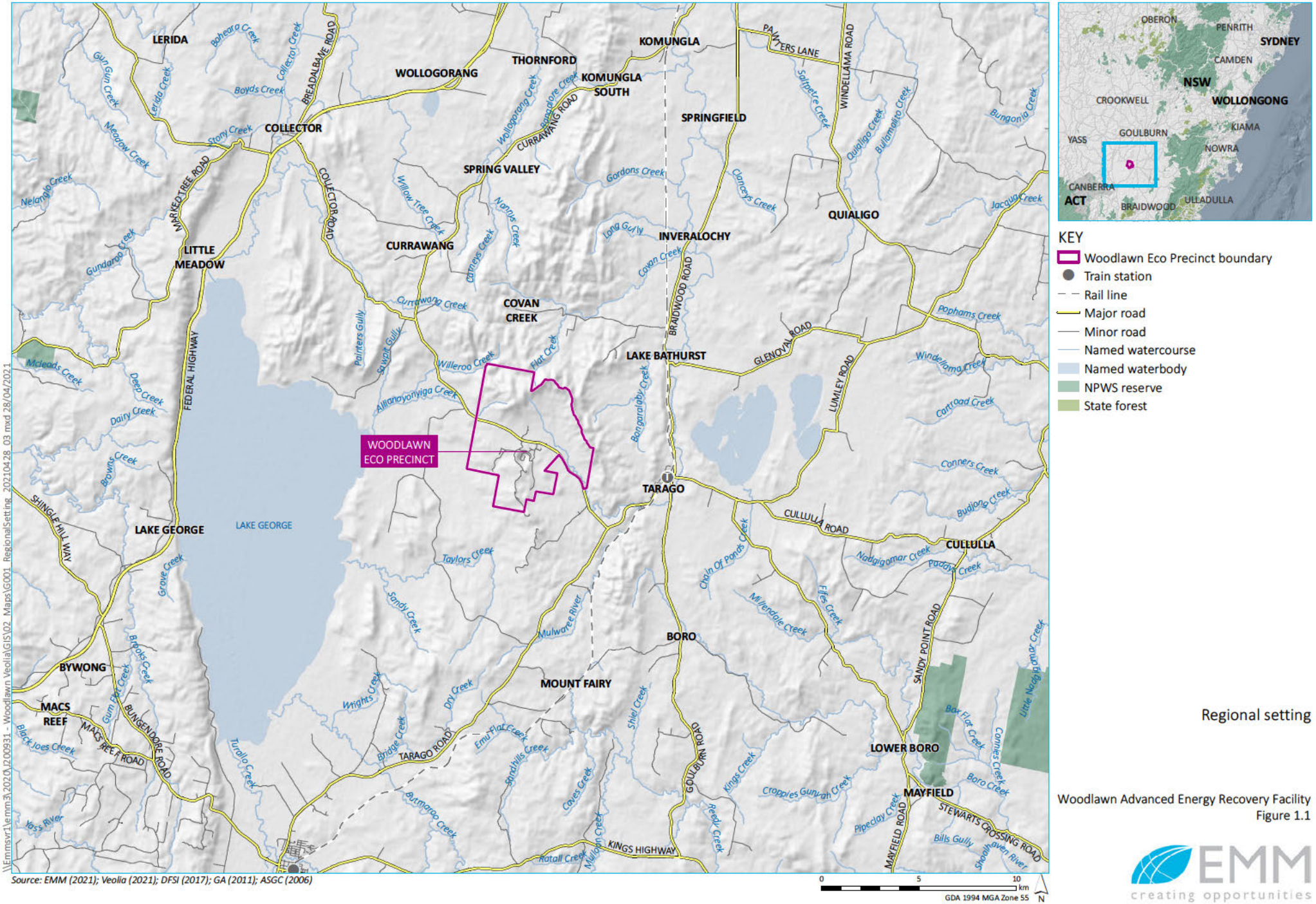

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Regional setting

Woodlawn Advanced Energy Recovery Facility
Figure 1.1

EMM
creating opportunities

B.5 Stages 2 and 3 – presentation of information and gathering cultural information

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2 July 2021

Re: Woodlawn Advanced Energy Recovery Facility - Project information and Aboriginal cultural heritage assessment methodology

Dear Sir/Madam,

1 Introduction

Veolia Environmental Services (Australia) Pty Ltd (Veolia) proposes to develop and operate the Woodlawn Advanced Energy Recovery Facility (ARC), an energy recovery facility (ERF), at the existing Woodlawn Eco Precinct in Tarago, NSW (Figure 1 & 2). The ERF will be designed to recover energy from waste that will otherwise be disposed to landfill. The project involves construction and operation of the following key components comprising the ARC:

- development of an ERF for the thermal treatment of residual municipal solid waste and commercial and industrial waste (the waste feedstock) that will otherwise be disposed of to landfill;
- thermal treatment in the ARC of approximately 380,000 tonnes per annum of the waste feedstock;
- recovery of about 39 MW of electrical energy;
- management of residual by-products generated by the ARC; and
- ancillary development of site infrastructure to facilitate construction and operation of the project.

EMM Consulting Pty Ltd (EMM) is undertaking an Aboriginal cultural heritage assessment (ACHA) to identify the presence of any Aboriginal cultural heritage values, and support Veolia to avoid and minimise impacts to Aboriginal heritage as a result of the proposed construction.

This document is provided in accordance with sections 4.2 and 4.3 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010), which sets out the Aboriginal consultation requirements for the project.

The aims of this letter are to:

- provide an overview of the project and how it will be assessed for Aboriginal cultural heritage values;
- provide background on the project;
- establish the purpose and aims of the Aboriginal consultation process;
- seek information about any Aboriginal cultural heritage values associated with the project and how they may affect, inform or refine the project and/or assessment methods;

- identify any culturally appropriate protocols that registered parties wish to be adopted during the information gathering process (eg protocols during field survey, or handling of culturally sensitive information); and
- present a draft of the intended assessment methods for your review and comment.

We welcome your feedback at your earliest convenience, and will be consulting with the Registered Aboriginal Parties (RAPs) for the duration of the ACHA. However, for the purposes of this initial stage and in accordance with the Heritage NSW guidelines, we request any written response on the information and process below by **COB 30 July 2021**.

EMM is working on the proponent's behalf, and all queries should be directed through EMM. Feedback can be provided to:

> Georgia Burnett, EMM Consulting Pty Ltd, 20 Chandos Street, St Leonards, NSW 2065; T: 02 9493 9500, E: gburnett@emmconsulting.com.au

2 Project information

2.1 Overview

Veolia owns and operates the Woodlawn Eco Precinct (the Eco Precinct), located approximately 40 km south of Goulburn and 50 km north of Canberra. The Eco Precinct has prioritised sustainable and innovative waste management practices for the last 20 years, and has been developed to include a range of complementary waste management and resource recovery operations and technologies. These include the Woodlawn Bioreactor (the Bioreactor), Woodlawn Bioenergy Power Station, Woodlawn Mechanical Biological Treatment (MBT) Facility, sustainable agricultural operations, aquaculture and horticulture operations utilising waste heat from energy production, and renewable energy generation including wind and solar. The Eco Precinct is part of an integrated waste management system which includes two transfer terminals at Clyde and Banksmeadow in Sydney and the Crisps Creek Intermodal Facility (IMF) in nearby Tarago, which receives waste from greater metropolitan Sydney.

Veolia proposes to develop and operate the Woodlawn ARC and EFT (the project), as the next phase of the Eco Precinct. This involves the development of an additional waste management technology at the Precinct, treating a portion of the waste stream, which is already approved to be received at the site via rail from Sydney and road from surrounding areas. Energy recovery is a well-used and recognised waste management technology globally, which is acknowledged to be environmentally preferable to disposal to landfill.

The construction of the project is expected to be undertaken over a period of three years. A detailed construction method and schedule has not been developed, however construction staging is likely to include:

- initial site preparation works, establishment of construction access roads, compounds, laydown areas and other infrastructure – 6 months;
- construction of the ERF building and associated site infrastructure – 2 years;
- commissioning and testing – 6 months; and
- landscaping and demobilisation – 2 months.

The construction phase of the project is expected to generate up to 300 jobs, the majority of which are expected to be generated in the Goulburn region.

As noted above, the current iteration of the design is still being finalised and has yet to be provided to EMM. The description of the concept design above is based on information provided through correspondence by

Veolia, and in the publicly available scoping document.[1] It is important to note that the works as currently described do not reflect a finalised or detailed submission, instead communicating the general works and design intent. Final designs will be provided when available and will be incorporated into the ACHA.

2.2 Background and current approvals pathway

The Woodlawn Eco Precinct has been subject to extensive disturbance and terrain modification associated with historic and current mining operations over the past 45 years and waste and resource recovery operations over the past 20 years. To date, there are no known and/or registered Aboriginal heritage sites located within the project footprint, and the majority of anticipated ground disturbances are within previously disturbed terrain.

It is anticipated that the project will be a State Significant Development (SSD) (SSD-21184278) under the provisions of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act). The project would therefore require approval from the Minister for Planning, and is to be accompanied by an Environmental Impact Statement (EIS). While the Secretary's Environmental Assessment Requirements (SEARs) for the project have not yet been issued by the Minister for Planning, the investigative requirements for Aboriginal heritage are expected to determine the need for an ACHA to be prepared to assess any Aboriginal cultural heritage values related to the project area. Note that SSD projects do not require separate approvals under the *National Parks and Wildlife Act 1974* (eg Aboriginal heritage impact permits), rather any subsequent requirements for heritage are managed in accordance with the conditions of approval, provided by the Minister.

In light of the anticipated Aboriginal heritage requirements, EMM is investigating the Aboriginal heritage and archaeological values of the project area through the development of an ACHA, including consultation with and participation of Aboriginal stakeholders in accordance with Heritage NSW guidelines.

3 Aboriginal stakeholders

Following the notification process undertaken between 28 May–23 June 2021, the following Aboriginal stakeholders have expressed an interest in being involved in the project:

- Pejar Local Aboriginal Lands Council
- Didge Ngunawal Clan
- Ginninderra Aboriginal Corporation
- [redacted]
- Muragadi
- Konanggo Aboriginal Cultural Heritage Services
- Ngunnawal Elders Corporation
- Yurwang Gundana Cultural Heritage Services
- [redacted]
- [redacted]

[1] https://www.planningportal.nsw.gov.au/major-projects/project/41991

- Freeman & Marx Pty Ltd
- Yurrandaali Cultural Services
- Thunderstone Aboriginal Cultural Services

4 Methods

The assessment of the development of the Woodlawn ARC is likely to be assessed under Part 4 (Division 4.7) of the EP&A Act. As such, additional approvals required under the *National Parks and Wildlife Act 1974* do not apply, though the SEARs are anticipated to require that Aboriginal heritage be assessed and managed in accordance with the following guidelines:

- *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011);
- *Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW* (the Code of Practice) (DECCW 2010); and
- *Aboriginal Consultation Requirements for Proponents 2010* (DECCW 2010).

4.1 Field investigation

The purpose of the assessment is to identify and manage the Aboriginal cultural heritage sites and values of all areas that will be affected by the project. In summary, this will involve.

- consultation with the Aboriginal stakeholders to identify socio-cultural values of the project area and places of special significance that should be considered;
- a search of the Aboriginal Heritage Information Management System (AHIMS) register for records of previously registered Aboriginal sites;
- a review of past Aboriginal heritage reports covering the study area;
- environmental landscape analysis to identify past Aboriginal resources and suitable occupation areas;
- synthesis of background research to develop a predictive model of Aboriginal site location;
- field investigation to validate the findings of the desktop assessment and identify any previously undocumented cultural material. This would include surface inspection and may extend to test excavations of areas of archaeological interest if required;
- an assessment of significance for Aboriginal cultural heritage values in the project area (with input from the registered Aboriginal stakeholders);
- where required, an impact assessment of how the project will affect Aboriginal cultural heritage values in the project area; and
- development of management recommendations based on the results of the assessment and input from registered Aboriginal stakeholders during the consultation process and particularly from the draft ACHA review period.

4.1.1 Archaeological survey

Survey of the project area would be undertaken over two days to identify any extant Aboriginal objects or sites. As the site has been historically subject to major disturbance and bulk earthworks across vast portions

of the project area, the survey will therefore only target landforms that have not been previously developed, likely followed by a vehicle reconnaissance across the boundary of the project area to verify anticipated levels of previous ground disturbance. The focus of the team will be to both investigate soil exposures for extant Aboriginal objects and identify landforms that have potential for cultural material to be present (either in surface or subsurface deposits). Where appropriate, surface investigation will consist of the survey team evenly spaced (5-10 m apart) walking transects across accessible parts of the project area, with a key focus on targeting areas of low disturbance. Any Aboriginal objects and/or landforms of interest identified during the course of the survey would be mapped and documented using hand-held GPS, photographs, sketches and/or written description.

The survey will be undertaken in accordance with Requirements 5 to 10 of the Code of Practice. In summary, the Code of Practice requires the following general methodology:

- pedestrian survey;
- survey and recording according to survey unit and/or transect;
- recording of beginning and end points of transects or the boundaries of survey units, and the spacing between survey personnel;
- recording of landform, soil information, land surface, vegetation conditions, visibility and exposure, and survey coverage;
- recording of any identified Aboriginal sites identified according to Requirements 6-8, and recording of any identified Aboriginal objects in accordance with Requirements 18-24 of the Code of Practice;
- if any Aboriginal objects and/or sites are identified in the course of the survey, site cards will be completed and submitted to the AHIMS registrar; and
- in the event of Aboriginal heritage being identified within the project footprint, undertake discussions on site as to the potential further investigation and/or management of these finds.

4.1.2 Archaeological test excavation (TBD)

At this stage, no test excavations are proposed, and the aim of the project is to avoid such a program where possible, largely through project redesign. However, if test excavations are required to further characterise the archaeological resource of an area identified in the survey, they would be implemented shortly following the survey, in accordance with the Code of Practice. Specifically, they would include the following activities:

- all test excavation pits would be spatially located using a differential GPS device, which would also provide elevation data;
- manual excavation of 0.25m² test pits in a systematic grid across areas of archaeological interest within the impact footprint. The spatial resolution of the grid would be dependent on on-ground conditions, but would likely have test pits between 20–50 m apart;
- excavation would use hand tools. Excavation of the first unit would be in 5 cm spits, with subsequent excavation allowed in 10 cm spits or according to stratigraphy (whichever is smallest) depending on the results of the first unit. Manual excavation would continue to either: i) the base of the cultural deposits; ii) to the depth of the underlying geology; or iii) to the maximum depth possible via hand excavation (likely ~ 80 cm).
- sieving of all manually excavated material through a 5 mm sieve;

- reduced levels of the top and bottom of the test pit would be documented using a dumpy level against a known elevation. Other levels may be taken as required;
- soil profiles would be recorded in accordance with the Code of Practice, including scaled drawings, photographs, and written descriptions;
- soil samples may be collected for description, sedimentological and chronological analysis where such analysis is considered likely to contribute significant information; and
- excavation procedures and protocols may be modified at the discretion of the Excavation Director, in consultation with the Aboriginal stakeholders and the proponent as the conditions in the field and nature of the excavations develop. This includes the movement of test pits to avoid existing built structures, buried services and disturbances not identified during the desktop phase.

4.2 Timeframes

The following indicative timeframes for the assessment would apply:

- distribution of this document to the registered Aboriginal stakeholders: June 2021;
- field investigation (survey) of the project area: early August 2021;
- distribution of the draft report: early September 2021;
- input into recommendations and review of draft report: early September – early October 2021;
- report finalisation and submission of AHIP application (if required): October 2021;

This timeline does not account for an archaeological test excavation program, as it is unclear if this will be required at this stage. If the archaeological survey identifies areas of archaeological interest, and test excavations are required to characterise the archaeological resource of the project area, the scope of these excavations will be refined to the current project footprint and an updated timeline will be provided.

5 What we need from you

In addition to the archaeological evidence described above, Aboriginal heritage incorporates a wide range of values such as stories, traditions and cultural practices. EMM welcomes advice from the Aboriginal community about cultural values (which might include archaeological sites or other types of values) relevant to the project area and its surrounds. EMM is relying on the Aboriginal community for advice on non-archaeological and intangible Aboriginal values for the study area. We are happy to discuss any information which you are willing to share and will respect confidentiality where requested.

EMM would appreciate your feedback on the above methodology proposed for the investigation and assessment of the project area. In responding, please also consider the following questions:

- Are there any other knowledge-holders or traditional owner groups we should be contacting to obtain cultural information on this area?
- Are there any protocols in relation to community interaction and/or cultural heritage that you would like adopted during the project?
- Are there any Aboriginal objects, places, sites or stories of cultural significance and/or importance that you are aware of within the project area? If so, please advise us how you wish them to be dealt with during the project.

- Is the information you are providing sensitive, gender specific, etc? If so, how would you like the information you provide to EMM to be managed? Noting that some documentation for the ACHA process will be required.

- Do you require any further information prior to EMM proceeding with the project?

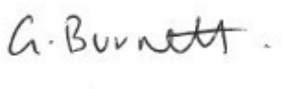
In your response, can you please also clearly identify who you would like EMM to talk to within your organisation, and provide contact details for these individuals. Please also ensure your preferred method of communication (eg telephone call, e-mail, letter, etc) is highlighted for subsequent stages of the project.

6 Closing

We look forward to receiving any response your organisation wishes to make about the proposed method by **COB 30 July 2021.** Your response will be documented and considered in the assessment. Most importantly, your cultural information is also welcome within this timeframe; but it can also be submitted up until the completion of the draft ACHA. EMM will be contacting RAPs following the closing of this review period, to organise fieldwork participation for the fieldwork.

Please feel free to contact me with any questions.

Yours sincerely



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Archaeologist

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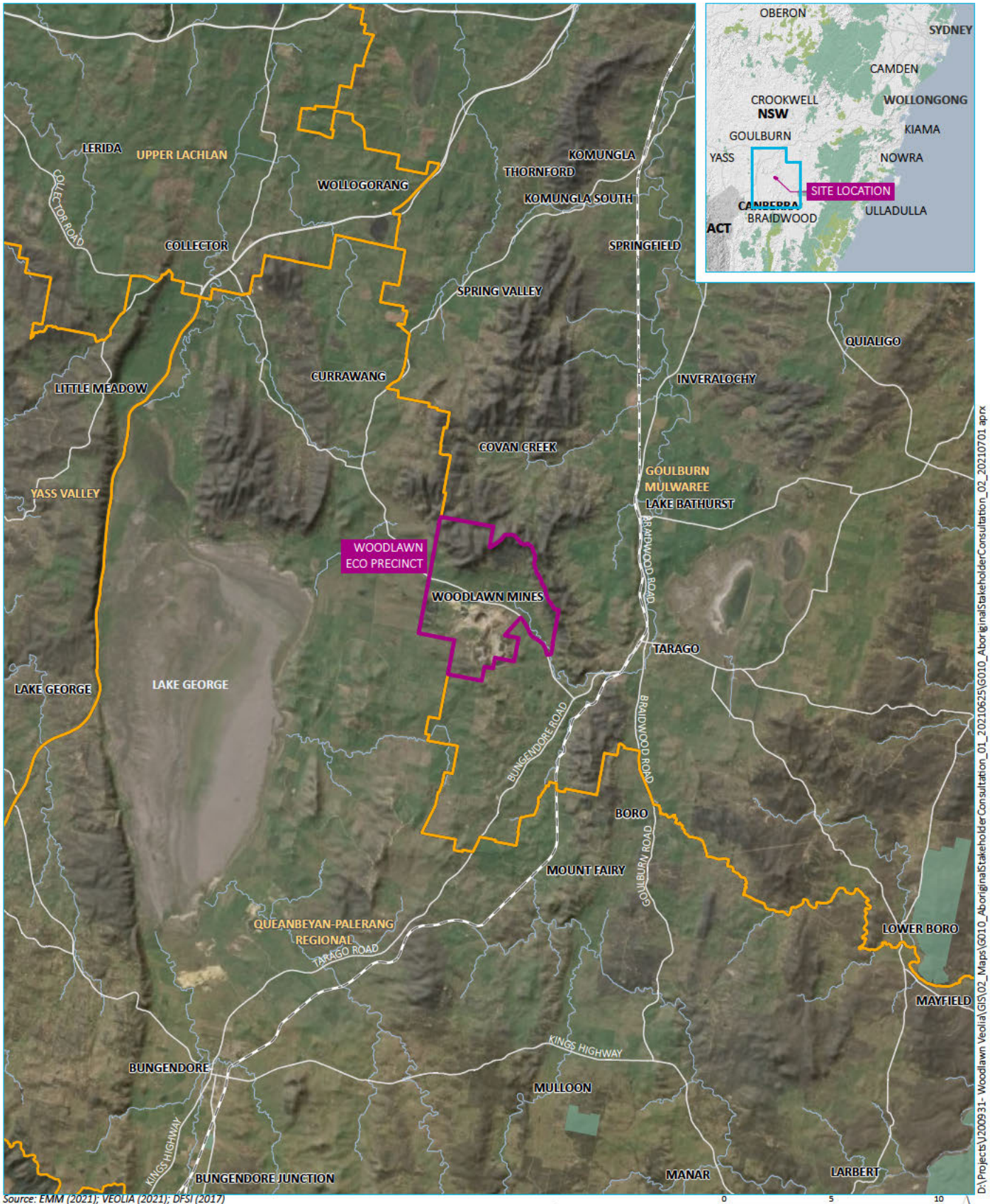

Source: EMM (2021); VEOLIA (2021); DFSI (2017)

0 5 10 km

GDA 1994 MGA Zone 55

N

KEY

- Woodlawn Eco Precinct
- Main road
- Rail line
- Watercourse
- Named waterbody
- NPWS reserve
- Local government area

DRAFT

Regional context

Veolia Woodlawn Eco Precinct
Advanced Energy Recovery Centre
Figure 1

EMM
creating opportunities



Source: EMM (2021); VEOLIA (2021); DFSI (2017)

0 0.5 1 km

GDA 1994 MGA Zone 55

N

KEY

- Project study area
- Main road
- Local road
- Track
- Watercourse

Project study area

DRAFT

Veolia Woodlawn Eco Precinct
Advanced Energy Recovery Centre
Figure 2

EMM
creating opportunities

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Abby Gils

From: Georgia Burnett
Sent: Friday, July 2, 2021 2:03 PM
Cc: Alan Williams
Subject: Woodlawn Energy Recovery Facility - Project information and assessment methods
Attachments: J200931_Woodlawn_Assessment methods_v2_Redacted.pdf

Hi all,

Thank you for registering your interest in the Aboriginal Cultural Heritage Assessment (ACHA) currently being undertaken for the proposed development at the Woodlawn Eco Precinct, at Tarago NSW 2580.

Attached to this email is a letter which outlines the proposed assessment methods for the ACHA. The letter includes information about the project itself and the development information, as well as our proposed methods for undertaking survey within the areas proposed for development. I would appreciate if you could please review the letter and let me know your thoughts or comments, if any. I would also be happy for you to share any cultural information about the study area and its cultural value to you.

Your response would be greatly appreciated, and please feel free to send any information or feedback to me via email, post or phone. As outlined in the letter, if you could provide any comments by **COB 30 July 2021**, that would be ideal.

Any questions, please let me know.

Kind regards,
Georgia

Georgia Burnett
Archaeologist
Bushfire, Ecology, Heritage and Spatial Solutions
EMM creating opportunities
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Connect with us
SYDNEY | Ground floor, 20 Chandos Street, St Leonards NSW 2065

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2 July 2021

Re: Woodlawn Advanced Energy Recovery Facility - Project information and Aboriginal cultural heritage assessment methodology

Dear Sir/Madam,

1 Introduction

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- Freeman & Marx Pty Ltd
- Yurrandaali Cultural Services
- Thunderstone Aboriginal Cultural Services

4 Methods

The assessment of the development of the Woodlawn ARC is likely to be assessed under Part 4 (Division 4.7) of the EP&A Act. As such, additional approvals required under the *National Parks and Wildlife Act 1974* do not apply, though the SEARs are anticipated to require that Aboriginal heritage be assessed and managed in accordance with the following guidelines:

- *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011);
- *Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW* (the Code of Practice) (DECCW 2010); and
- *Aboriginal Consultation Requirements for Proponents 2010* (DECCW 2010).

4.1 Field investigation

The purpose of the assessment is to identify and manage the Aboriginal cultural heritage sites and values of all areas that will be affected by the project. In summary, this will involve.

- consultation with the Aboriginal stakeholders to identify socio-cultural values of the project area and places of special significance that should be considered;
- a search of the Aboriginal Heritage Information Management System (AHIMS) register for records of previously registered Aboriginal sites;
- a review of past Aboriginal heritage reports covering the study area;
- environmental landscape analysis to identify past Aboriginal resources and suitable occupation areas;
- synthesis of background research to develop a predictive model of Aboriginal site location;
- field investigation to validate the findings of the desktop assessment and identify any previously undocumented cultural material. This would include surface inspection and may extend to test excavations of areas of archaeological interest if required;
- an assessment of significance for Aboriginal cultural heritage values in the project area (with input from the registered Aboriginal stakeholders);
- where required, an impact assessment of how the project will affect Aboriginal cultural heritage values in the project area; and
- development of management recommendations based on the results of the assessment and input from registered Aboriginal stakeholders during the consultation process and particularly from the draft ACHA review period.

4.1.1 Archaeological survey

Survey of the project area would be undertaken over two days to identify any extant Aboriginal objects or sites. As the site has been historically subject to major disturbance and bulk earthworks across vast portions

of the project area, the survey will therefore only target landforms that have not been previously developed, likely followed by a vehicle reconnaissance across the boundary of the project area to verify anticipated levels of previous ground disturbance. The focus of the team will be to both investigate soil exposures for extant Aboriginal objects and identify landforms that have potential for cultural material to be present (either in surface or subsurface deposits). Where appropriate, surface investigation will consist of the survey team evenly spaced (5-10 m apart) walking transects across accessible parts of the project area, with a key focus on targeting areas of low disturbance. Any Aboriginal objects and/or landforms of interest identified during the course of the survey would be mapped and documented using hand-held GPS, photographs, sketches and/or written description.

The survey will be undertaken in accordance with Requirements 5 to 10 of the Code of Practice. In summary, the Code of Practice requires the following general methodology:

- pedestrian survey;
- survey and recording according to survey unit and/or transect;
- recording of beginning and end points of transects or the boundaries of survey units, and the spacing between survey personnel;
- recording of landform, soil information, land surface, vegetation conditions, visibility and exposure, and survey coverage;
- recording of any identified Aboriginal sites identified according to Requirements 6-8, and recording of any identified Aboriginal objects in accordance with Requirements 18-24 of the Code of Practice;
- if any Aboriginal objects and/or sites are identified in the course of the survey, site cards will be completed and submitted to the AHIMS registrar; and
- in the event of Aboriginal heritage being identified within the project footprint, undertake discussions on site as to the potential further investigation and/or management of these finds.

4.1.2 Archaeological test excavation (TBD)

At this stage, no test excavations are proposed, and the aim of the project is to avoid such a program where possible, largely through project redesign. However, if test excavations are required to further characterise the archaeological resource of an area identified in the survey, they would be implemented shortly following the survey, in accordance with the Code of Practice. Specifically, they would include the following activities:

- all test excavation pits would be spatially located using a differential GPS device, which would also provide elevation data;
- manual excavation of 0.25m² test pits in a systematic grid across areas of archaeological interest within the impact footprint. The spatial resolution of the grid would be dependent on on-ground conditions, but would likely have test pits between 20–50 m apart;
- excavation would use hand tools. Excavation of the first unit would be in 5 cm spits, with subsequent excavation allowed in 10 cm spits or according to stratigraphy (whichever is smallest) depending on the results of the first unit. Manual excavation would continue to either: i) the base of the cultural deposits; ii) to the depth of the underlying geology; or iii) to the maximum depth possible via hand excavation (likely ~ 80 cm).
- sieving of all manually excavated material through a 5 mm sieve;

- reduced levels of the top and bottom of the test pit would be documented using a dumpy level against a known elevation. Other levels may be taken as required;
- soil profiles would be recorded in accordance with the Code of Practice, including scaled drawings, photographs, and written descriptions;
- soil samples may be collected for description, sedimentological and chronological analysis where such analysis is considered likely to contribute significant information; and
- excavation procedures and protocols may be modified at the discretion of the Excavation Director, in consultation with the Aboriginal stakeholders and the proponent as the conditions in the field and nature of the excavations develop. This includes the movement of test pits to avoid existing built structures, buried services and disturbances not identified during the desktop phase.

4.2 Timeframes

The following indicative timeframes for the assessment would apply:

- distribution of this document to the registered Aboriginal stakeholders: June 2021;
- field investigation (survey) of the project area: early August 2021;
- distribution of the draft report: early September 2021;
- input into recommendations and review of draft report: early September – early October 2021;
- report finalisation and submission of AHIP application (if required): October 2021;

This timeline does not account for an archaeological test excavation program, as it is unclear if this will be required at this stage. If the archaeological survey identifies areas of archaeological interest, and test excavations are required to characterise the archaeological resource of the project area, the scope of these excavations will be refined to the current project footprint and an updated timeline will be provided.

5 What we need from you

In addition to the archaeological evidence described above, Aboriginal heritage incorporates a wide range of values such as stories, traditions and cultural practices. EMM welcomes advice from the Aboriginal community about cultural values (which might include archaeological sites or other types of values) relevant to the project area and its surrounds. EMM is relying on the Aboriginal community for advice on non-archaeological and intangible Aboriginal values for the study area. We are happy to discuss any information which you are willing to share and will respect confidentiality where requested.

EMM would appreciate your feedback on the above methodology proposed for the investigation and assessment of the project area. In responding, please also consider the following questions:

- Are there any other knowledge-holders or traditional owner groups we should be contacting to obtain cultural information on this area?
- Are there any protocols in relation to community interaction and/or cultural heritage that you would like adopted during the project?
- Are there any Aboriginal objects, places, sites or stories of cultural significance and/or importance that you are aware of within the project area? If so, please advise us how you wish them to be dealt with during the project.

- Is the information you are providing sensitive, gender specific, etc? If so, how would you like the information you provide to EMM to be managed? Noting that some documentation for the ACHA process will be required.

- Do you require any further information prior to EMM proceeding with the project?

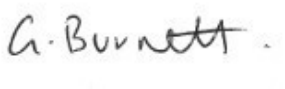
In your response, can you please also clearly identify who you would like EMM to talk to within your organisation, and provide contact details for these individuals. Please also ensure your preferred method of communication (eg telephone call, e-mail, letter, etc) is highlighted for subsequent stages of the project.

6 Closing

We look forward to receiving any response your organisation wishes to make about the proposed method by **COB 30 July 2021.** Your response will be documented and considered in the assessment. Most importantly, your cultural information is also welcome within this timeframe; but it can also be submitted up until the completion of the draft ACHA. EMM will be contacting RAPs following the closing of this review period, to organise fieldwork participation for the fieldwork.

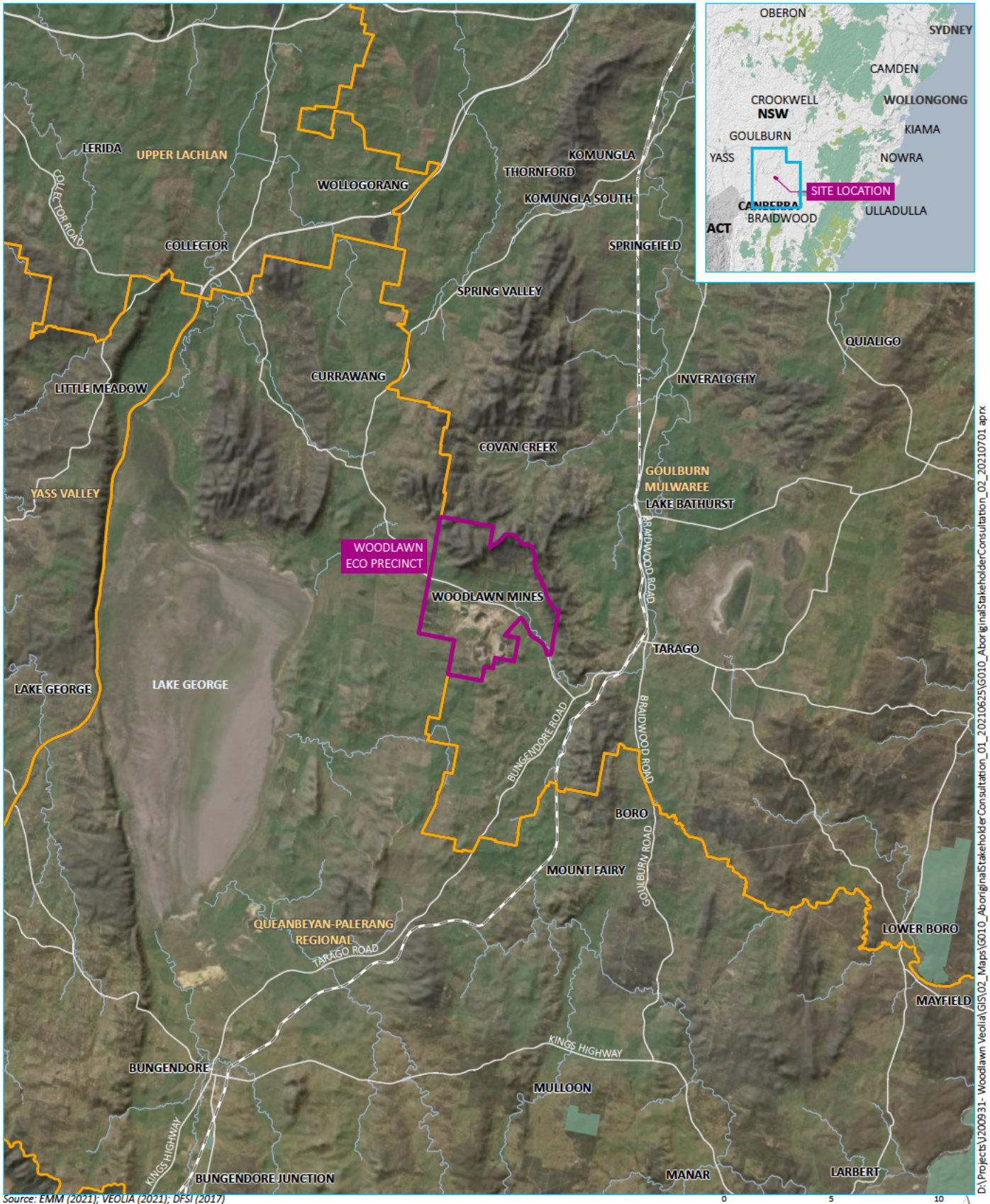
Please feel free to contact me with any questions.

Yours sincerely



Georgia Burnett
Archaeologist

gburnett@emmconsulting.com.au



Source: EMM (2021); VEOLIA (2021); DFSI (2017)

0 5 10 km

GDA 1994 MGA Zone 55

N

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KEY

- Woodlawn Eco Precinct
- Main road
- Rail line
- Watercourse
- Named waterbody
- NPWS reserve
- Local government area

DRAFT

Regional context

Veolia Woodlawn Eco Precinct
Advanced Energy Recovery Centre
Figure 1

EMM
creating opportunities



Source: EMM (2021); VEOLIA (2021); DFSI (2017)

0 0.5 1 km

GDA 1994 MGA Zone 55

N

KEY

- Project study area
- Main road
- Local road
- Track
- Watercourse

Project study area

DRAFT

Veolia Woodlawn Eco Precinct
Advanced Energy Recovery Centre
Figure 2

EMM
creating opportunities

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Abby Gils

From: Georgia Burnett
Sent: Monday, July 26, 2021 8:50 AM
Cc: Alan Williams
Subject: RE: Woodlawn Energy Recovery Facility - Project information and assessment methods

Hi all,

Just a reminder that the comment period for the ACHA methodology proposed for the Woodlawn Eco Precinct development close **COB Friday 30 July 2021**. Thank you to those who have responded already.

Please let me know if you have any questions or concerns in the meantime.

Cheers,
Georgia

Georgia Burnett
Archaeologist

T 02 9493 9500
M 0459 295 806
www.emmconsulting.com.au

From: Georgia Burnett
Sent: Friday, 2 July 2021 2:03 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: Woodlawn Energy Recovery Facility - Project information and assessment methods

Hi all,

Thank you for registering your interest in the Aboriginal Cultural Heritage Assessment (ACHA) currently being undertaken for the proposed development at the Woodlawn Eco Precinct, at Tarago NSW 2580.

Attached to this email is a letter which outlines the proposed assessment methods for the ACHA. The letter includes information about the project itself and the development information, as well as our proposed methods for undertaking survey within the areas proposed for development. I would appreciate if you could please review the letter and let me know your thoughts or comments, if any. I would also be happy for you to share any cultural information about the study area and its cultural value to you.

Your response would be greatly appreciated, and please feel free to send any information or feedback to me via email, post or phone. As outlined in the letter, if you could provide any comments by **COB 30 July 2021**, that would be ideal.

Any questions, please let me know.

Kind regards,
Georgia

Georgia Burnett
Archaeologist
Bushfire, Ecology, Heritage and Spatial Solutions

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M 0459 295 806
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Abby Gils

From: lilly carroll [redacted]
Sent: Friday, July 2, 2021 7:16 PM
To: Georgia Burnett
Cc: Alan Williams
Subject: Re: Woodlawn Energy Recovery Facility - Project information and assessment methods

CAUTION: This email originated outside of the Organisation.

Hi Georgia

DNC has read through the methodology Towards the survey etc and agrees to all proposals that has been set outI've had to work with you again soon

Sent from Yahoo Mail for iPhone

On Friday, July 2, 2021, 2:03 pm, Georgia Burnett <gburnett@emmconsulting.com.au> wrote:

> Hi all,
>
> Thank you for registering your interest in the Aboriginal Cultural Heritage Assessment (ACHA) currently being undertaken for the proposed development at the Woodlawn Eco Precinct, at Tarago NSW 2580.
>
> Attached to this email is a letter which outlines the proposed assessment methods for the ACHA. The letter includes information about the project itself and the development information, as well as our proposed methods for undertaking survey within the areas proposed for development. I would appreciate if you could please review the letter and let me know your thoughts or comments, if any. I would also be happy for you to share any cultural information about the study area and its cultural value to you.
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> Your response would be greatly appreciated, and please feel free to send any information or feedback to me via email, post or phone. As outlined in the letter, if you could provide any comments by **COB 30 July 2021**, that would be ideal.
>
> Any questions, please let me know.
>
> Kind regards,
>
> Georgia

Georgia Burnett
Archaeologist

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Abby Gils

From: jesse johnson [redacted]
Sent: Monday, July 5, 2021 11:51 AM
To: Georgia Burnett
Subject: Re: Woodlawn Energy Recovery Facility - Project information and assessment methods

CAUTION: This email originated outside of the Organisation.

Hi Georgia
I have read the project information and methodology for the above project, our family has strong connection to the area. Our family are Ngunnawals who are from the Goulburn area.
Thanks
Jesse Johnson
[redacted]

On Friday, 2 July 2021, 02:03:16 pm AEST, Georgia Burnett <gburnett@emmconsulting.com.au> wrote:

Hi all,

Thank you for registering your interest in the Aboriginal Cultural Heritage Assessment (ACHA) currently being undertaken for the proposed development at the Woodlawn Eco Precinct, at Tarago NSW 2580.

Attached to this email is a letter which outlines the proposed assessment methods for the ACHA. The letter includes information about the project itself and the development information, as well as our proposed methods for undertaking survey within the areas proposed for development. I would appreciate if you could please review the letter and let me know your thoughts or comments, if any. I would also be happy for you to share any cultural information about the study area and its cultural value to you.

Your response would be greatly appreciated, and please feel free to send any information or feedback to me via email, post or phone. As outlined in the letter, if you could provide any comments by **COB 30 July 2021**, that would be ideal.

Any questions, please let me know.

Kind regards,

Georgia

Georgia Burnett
Archaeologist

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Abby Gils

From: Ngunawal Heritage Aboriginal Corporation [redacted] >
Sent: Friday, July 9, 2021 5:05 PM
To: Georgia Burnett
Subject: Re: Woodlawn Energy Recovery Facility - Project information and assessment methods
Attachments: NHAC Response - Project Information and Methodology.pdf

CAUTION: This email originated outside of the Organisation.

Hi Georgia,

Thank you for your email.

As requested please refer to the attached document regarding project information and methodology for this project.

If you require any further information please do not hesitate to contact me.

Kind Regards

Dean Delponte
Director
[redacted]

Ngunawal Heritage Aboriginal Corporation
ICN 4755

On Fri, Jul 2, 2021 at 2:03 PM Georgia Burnett <gburnett@emmconsulting.com.au> wrote:

> Hi all,
>
> Thank you for registering your interest in the Aboriginal Cultural Heritage Assessment (ACHA) currently being undertaken for the proposed development at the Woodlawn Eco Precinct, at Tarago NSW 2580.
>
> Attached to this email is a letter which outlines the proposed assessment methods for the ACHA. The letter includes information about the project itself and the development information, as well as our proposed methods for undertaking survey within the areas proposed for development. I would appreciate if you could please review the letter and let me know your thoughts or comments, if any. I would also be happy for you to share any cultural information about the study area and its cultural value to you.
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Any questions, please let me know.

Kind regards,

Georgia

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The assessment of any study area should always take into account the environmental context of the wider area in which a particular site is found. Cultural connections to landscape spread far and wide over many different types of terrain. Sometimes sites will occur where least expected and others will be under estimated.

The project information and methodology outlined for this project is consistent with our views when assessing the potential in identifying Aboriginal sites across this project site.

Our consultants are passionate about their Aboriginal heritage and are dedicated to working with Governments, Proponents, Archaeologists and other Aboriginal organisations to ensure that Aboriginal objects and places with Aboriginal cultural heritage significance are appropriately protected.

All our consultants have completed the WorkCover course in OHS General Induction for Construction Work in NSW.

Some consultants also have current Senior First Aid certificates and have wide-ranging experience in management, construction work and manual labour.

Our consultants have extensive experience in Aboriginal heritage assessment work and have helped to identify many different types of Aboriginal objects and places with Aboriginal cultural heritage significance.

Consultants have worked on a variety of sites around the New South Wales region including (but not limited to):

- Eastern Gas Pipeline between Melbourne, Canberra and Sydney – Duke Energy
- Department of Defence Headquarters Joint Operations Project, Queanbeyan – URS and Leightons Contractors
- Marulan South Quarry Project for the Construction of 2 Dams – Blue Circle Southern Cement
- Marulan South Mine Waste Site – Blue Circle Southern Cement
- Coolac By-Pass, Hume Highway – RTA
- Fibre Optic Cabling, Yass – Telecom
- Edwin Land Drive, Jerrabomberra – RTA
- Yass-Wagga Transmission Line – TransGrid
- Tarlo River National Park – Telstra
- Royalla Estate – Link Management
- Capital Solar Farm Substation, Bungendore – Infigen Suntech
- Marulan Peppertree Quarry – Boral
- Marulan Limestone Mine – GSS Environmental
- Gounyan Curves, Yass – RTA
- Barton Highway, Yass to Canberra – RTA
- Cooma to Bega Transmission Line Upgrade – Country Energy

- Bungonia State Conservation Area Camp Upgrade – NPWS
- Dargues Reef Majors Creek – Big Island Mining
- Highland Source Project – Goulburn Mulwaree Council
- Galong Mine Site – Graymont

Across these projects, our consultants have typically been involved in the following work:

- Surveying - walking with the archaeologists across the proposed development area within the defined boundaries to identify scattered aboriginal artefacts on top of the soil;
- Marking the identified areas and recording their GPS position;
- Digging spits of specified dimensions at gradual levels until clay is reached;
- Bucketing the contents of each spit and marking each bucket with the spit position;
- Dry sieving and wet sieving to find and identify Aboriginal artefacts;
- Working with the archaeologist to sort and identify genuine Aboriginal artefacts including bagging and marking the artefacts;
- Providing advice on the cultural significance and values of the objects or places identified;
- Reporting daily finds to relevant Aboriginal stakeholders; and
- Working with archaeologists and proponents to develop preferred site management options.

It is important to be consistent with current guidelines and requirements when developing strategies and to actively involve Aboriginal stakeholders whenever Aboriginal heritage may be impacted by any proposed works. This will help to ensure duty of care to all Aboriginal heritage with best practice and provide a positive outcome for all parties involved.

Abby Gils

From: Steven Johnson [redacted]
Sent: Monday, July 26, 2021 10:33 AM
To: Georgia Burnett
Subject: Re: Woodlawn Energy Recovery Facility - Project information and assessment methods

CAUTION: This email originated outside of the Organisation.

Hey Georgia

We agree with the methods.

Regards
Steve

On Monday, 26 July 2021, 08:50:21 am AEST, Georgia Burnett <gburnett@emmconsulting.com.au> wrote:

Hi all,

Just a reminder that the comment period for the ACHA methodology proposed for the Woodlawn Eco Precinct development close **COB Friday 30 July 2021**. Thank you to those who have responded already.

Please let me know if you have any questions or concerns in the meantime.

Cheers,

Georgia

Georgia Burnett
Archaeologist

T 02 9493 9500

M 0459 295 806

www.emmconsulting.com.au

From: Georgia Burnett
Sent: Friday, 2 July 2021 2:03 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: Woodlawn Energy Recovery Facility - Project information and assessment methods

Hi all,

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Your response would be greatly appreciated, and please feel free to send any information or feedback to me via email, post or phone. As outlined in the letter, if you could provide any comments by **COB 30 July 2021**, that would be ideal.

Any questions, please let me know.

Kind regards,

Georgia

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Archaeologist

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Abby Gils

From: Arni Williams <[redacted]
Sent: Wednesday, July 28, 2021 11:59 AM
To: Georgia Burnett
Subject: Re: Woodlawn Energy Recovery Facility - Project information and assessment methods

CAUTION: This email originated outside of the Organisation.

Hi Georgia,

I hope this email finds you well.

First off, apologies for the slow response.

Regarding the methodology, it looks pretty sound and thorough to me, and I agree that the area is obviously highly disturbed. I noticed in the map that there is a small creek within the vicinity of the project area. This definitely increases the likelihood of encountering Aboriginal sites and also increases the potential for *in situ* sites occurring in the project area. Field survey should enable us to better understand the likelihood of *in situ* sites being found and whether test excavation will be needed. I'm not sure where Amy Way's work was focussed specifically, I think dunes to the south of Weereewa, but they uncovered numerous stone artefacts. So we know there is archaeology in the area.

In terms of intangible heritage, I am not an elder and therefore am not responsible for holding such knowledge at this point. I am aware there is a men's site located to the south of Weereewa but this is not impacted by the mine or proposed works. It does mean that such sites exist around Weereewa and that knowledge of such sites may still be held by some elders. I'll have a yarn to my dad and some of my Aunts and Uncles about any knowledge they may retain regarding Weeweera. If I learn anything I'll update you, but for now, I am unaware of any sensitive sites associated with the proposal area.

I'll speak to you soon

Best wishes,
Rob

On Mon, Jul 26, 2021 at 8:50 AM Georgia Burnett <gburnett@emmconsulting.com.au> wrote:

> Hi all,
>
> Just a reminder that the comment period for the ACHA methodology proposed for the Woodlawn Eco Precinct development close **COB Friday 30 July 2021**. Thank you to those who have responded already.
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> Please let me know if you have any questions or concerns in the meantime.
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> Cheers,

Georgia

Georgia Burnett
Archaeologist

T 02 9493 9500

M 0459 295 806

www.emmconsulting.com.au

From: Georgia Burnett
Sent: Friday, 2 July 2021 2:03 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: Woodlawn Energy Recovery Facility - Project information and assessment methods

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Any questions, please let me know.

Kind regards,

Georgia

Georgia Burnett
Archaeologist

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B.6 AFG meeting minutes, August 2021

Abby Gils

From: Alan Williams
Sent: Monday, August 23, 2021 3:18 PM
To: Alan Williams
Cc: Rachel Dodd; Georgia Burnett; Cameron Neal; lee.smith@veolia.com
Subject: Proposed Woodlawn ARC Centre - AFG Meeting (20 August 2021) - Meeting Minutes

Hi All,

Thank you to those that were able to attend the meeting today. I apologise we couldn't hold it in person on site. Please find below some of the key points that were raised and discussed. For those I haven't managed to speak with yet, please just let me know suitable times/locations/methods and I'll happily run you through the information below in more detail.

Online meeting # 1 (20 August 2021): Alan Williams (EMM), Lee Smith (Veolia), Merekai Bell (Yurwang Gundana Cultural Heritage Services), Rob Williams (Ngunawal Elders Corporation), Rob Young (Konanggo Aboriginal Cultural Heritage Services), Dean Delphonte (Ngunawal Heritage Aboriginal Corporation), Lily Carroll (Didge Ngunawal Clan)
Online meeting #2 (20 August 2021): Alan Williams (EMM), Lee Smith (Veolia), Lilly Carroll (Didge Ngunawal Clan), Steve Johnson (Woka Aboriginal Corporation), Marilyn Carroll-Johnson (Corroboree Aboriginal Corporation), Darlene Johnson (for Muragadi)
Online meeting #3 (23 August 2021): Alan Williams (EMM), Lee Smith (Veolia), Tyronne Bell (Thunderstone Aboriginal Cultural Services)

Key points and actions:

- Key agenda points for the three meetings included:
    - Acknowledgement of Country
    - Background of the site and the proposed Woodlawn ARC project. The proposed assessment process, and its need for an Aboriginal cultural heritage assessment (ACHA). An explanation as to why on-site activities could not be undertaken during current COVID restrictions that hindered some components of the ACHA, and EMM's attempts to ensure Aboriginal engagement.
    - Some background on the potential cultural materials that may occur on the site, brief description of the extent of previous disturbance likely impacting such material, and a desired focus on the intangible values of the site and its association with the surrounding cultural landscape, such as Lake George.
    - A virtual tour of the study area using online maps and photographs of the main locales.
    - Discussion on the items above and way forward.

- Discussions and outcomes included:
    - At all of the meetings, AW outlined the project and ACHA process in detail, including:
        - The long modern history of the site, including its initial use as a Silver/Lead/Copper open cut mine, followed by its use for the last 20 years by Veolia for waste management. Elements of the existing site were outlined including established reservoirs, the void used for refuse, the existing bioreactor, windfarm, and other various activities. This was shown in the context of the surrounding environment, including Lake George (Weereewa) and Shoalhaven River.
        - Outlined the proposed development activity, including the establishment of a monocell amongst the current reservoirs, and the location of the ARC, including some of its more major elements (eg road access, flyash storage, etc). Discussions included the overall Environmental Impact Statement (EIS) process and how the Aboriginal heritage investigations fitted into the broader assessment process.

- Provided a brief overview of previous archaeological investigations in the area and their findings. This appeared to be dominated by various densities of surface and/or shallowly buried stone artefact material focussed especially on the banks of Lake George and high elevations near the study area. As such, provided an indication of what may be expected in the study area where undisturbed soil profiles are present.
- Outlined in some detail the history of the site, which showed that significant ground disturbance and earthworks having occurred within the two proposed activity areas. This included the existing reservoirs in the case of the monocell and associated workings (noting a portion to the northeast appears less affected, but is currently outside the study area), and the scale of earthworks and activity associated with the ARC location that was historically part of the processing for the earlier mine.
- Provided a virtual tour of the two proposed activity areas using both aerial maps and a number of photographs taken of the two locales in recent months.
- Discussion on some probably recommendations, including the post-approval need for an Aboriginal cultural heritage management plan (ACHMP), and the need for on-site activities.

- Feedback occurred throughout the meetings, and at length once the presentation was complete. Key points included:
  - Everyone supported the completion of the ACHA based on the information provided, and had no major issues with the finalisation of the report and approval of the project, as long as opportunity in the post-approval was provided for Aboriginal people to visit and inspect the site, allow 'Connection to Country' and further exploration of any potential intangible connections.
  - The need for suitable field survey and/or test excavations (if required) to occur at some point in the project, acknowledging that these may be post-approval. The area to the north of the proposed monocell location, which appeared less disturbed than other parts of the site, formed a focus of some of these discussions.
  - AW confirmed that all of the above issues would be integrated specifically into the recommendations of the ACHA and likely form part of an ACHMP that would result from the project.
  - Some discussions around socio-economic opportunities across the site (such as employment, education opportunities, etc). AW has provided contact list of RAPs to Veolia to pursue independently of the project.
- AW outlined some potential timeframes for the finalisation of the ACHA, and next steps including a further meeting or paid opportunity to comment in the coming weeks.

Please let me know if I have omitted or forgotten anything, happy to correct were inaccurate.

Happy to discuss.

Thanks
A

Dr Alan Williams FSA MAACAI
Associate Director
National Technical Leader, Aboriginal Heritage

Bushfire, Ecology, Heritage and Spatial Solutions

T 02 9493 9500
M 0438 104 740
D 02 9493 9584

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B.7 Stage 4 – Aboriginal feedback of the draft ACHA

Georgia Burnett

From: Georgia Burnett
Sent: Friday, 17 September 2021 6:33 PM
Cc: Alan Williams
Subject: Woodlawn ARC - Draft ACHA for review
Attachments: J200931_Woodlawn ARC_ACHA_DRAFT_RP8_v1.0_Report_Redacted.pdf

Hi all,

Thank you all for your involvement to date for Aboriginal cultural heritage assessment for the proposed the Woodlawn ARC project. I can now provide you with a copy of the draft ACHA, for your review.

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Cheers,
Georgia

Georgia Burnett
Archaeologist
Bushfire, Ecology, Heritage and Spatial Solutions
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T 02 9493 9500
M 0459 295 806
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Georgia Burnett

From: Alan Williams
Sent: Monday, 20 September 2021 8:19 AM
To: yurwang gundana; Georgia Burnett
Subject: RE: Woodlawn ARC - Draft ACHA for review

Hi Merekai

Thanks for the response . This was a key outcome of our meetings as well. Unfortunately, due to COVID requirements, it has not been possible to undertake any on-site activities. However, as you'll see from our management strategy and recommendations, we are very clear that such on-site inspections/activities will be required prior to any form of ground disturbance; and is to be integrated into the proposed management plan.

We'll include your comments re-iterating the need for traditional owners to get on Country in the final report.

Thanks
A

Dr Alan Williams FSA FRSA MAACAI
Associate Director | National Technical Leader, Aboriginal Heritage
T 02 9493 9584
M 0438 104 740
www.emmconsulting.com.au

I work flexibly. I'm sending you this message now because it's a good time for me, but do not expect you to read, respond or action it outside your regular hours

---

From: yurwang gundana <[redacted]>
Sent: Sunday, 19 September 2021 5:12 PM
To: Georgia Burnett <gburnett@emmconsulting.com.au>
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: Re: Woodlawn ARC - Draft ACHA for review

CAUTION: This email originated outside of the Organisation.

Hi Georgia, I hope you are doing well

Yurwang gundana agrees with the methodology but as for the reccomadations, as a traditional owner i would like to go out on site and do a survey and if need be a test excavation because that i something that needs to be done

thanks
Merekai Bell
Yurwang Gundana Cultural Heritage Services

Get Outlook for Android

From: Georgia Burnett <gburnett@emmconsulting.com.au>
Sent: Friday, September 17, 2021 6:32:32 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: Woodlawn ARC - Draft ACHA for review

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Thank you all for your involvement to date for Aboriginal cultural heritage assessment for the proposed the Woodlawn ARC project. I can now provide you with a copy of the draft ACHA, for your review.

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Cheers,
Georgia

Georgia Burnett
Archaeologist
Bushfire, Ecology, Heritage and Spatial Solutions
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M 0459 295 806
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Georgia Burnett

From: lilly carroll <[redacted]
Sent: Tuesday, 21 September 2021 4:33 PM
To: Georgia Burnett
Cc: Alan Williams
Subject: Re: Woodlawn ARC - Draft ACHA for review

CAUTION: This email originated outside of the Organisation.

Hi Georgia

DNC has read through the draft ACHA for Woodlawn project, and is happy to proceed

Kind regards
Paul Boyd & Lilly Carroll
Directors DNC
[redacted]

Sent from Yahoo Mail for iPhone

On Friday, September 17, 2021, 6:33 pm, Georgia Burnett <gburnett@emmconsulting.com.au> wrote:

> Hi all,
>
> Thank you all for your involvement to date for Aboriginal cultural heritage assessment for the proposed the Woodlawn ARC project. I can now provide you with a copy of the draft ACHA, for your review.
>
> The draft report can be found at the following link: Woodlawn ARC
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> I invite you to please have a look through the report and if you would like, to provide any feedback, thoughts or input on the proposed recommendations. I would greatly appreciate any feedback, but please aim to get to that back to me before **Friday 15 October 2021**.
>
> If you have any problems downloading or accessing these reports, or want to chat about the report further, please feel free to email or call myself or Alan (CC'd). Also, if you require a **printed copy** posted to you, please let me know and I can arrange this for you.

Cheers,

Georgia

Georgia Burnett
Archaeologist

Bushfire, Ecology, Heritage and Spatial Solutions

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Georgia Burnett

From: Corrroboree Aboriginal Corporation <[redacted]>
Sent: Wednesday, 29 September 2021 8:59 AM
To: Georgia Burnett
Subject: Re: Woodlawn ARC - Draft ACHA for review

CAUTION: This email originated outside of the Organisation.

Hi Georgia
We agree with review

Kind regards
Marilyn Carroll-Johnson
Director
Corroboree Aboriginal Corporation
[redacted]
Address: PO Box 3340
ROUSE HILL NSW 2155

On 17 Sep 2021, at 6:32 pm, Georgia Burnett <gburnett@emmconsulting.com.au> wrote:

Hi all,

Thank you all for your involvement to date for Aboriginal cultural heritage assessment for the proposed the Woodlawn ARC project. I can now provide you with a copy of the draft ACHA, for your review.

The draft report can be found at the following link:
<image004.png>
Woodlawn ARC
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Cheers,
Georgia

Georgia Burnett
Archaeologist
Bushfire, Ecology, Heritage and Spatial Solutions

T 02 9493 9500
M 0459 295 806

<image001.png> <image002.png>

<image003.png>
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<J200931_Woodlawn ARC_ACHA_DRAFT_RP8_v1.0_Report_Redacted.pdf>

Georgia Burnett

From: Georgia Burnett
Sent: Friday, 8 October 2021 1:34 PM
Cc: Alan Williams
Subject: RE: Woodlawn ARC - Draft ACHA for review
Attachments: J200931_Woodlawn ARC_ACHA_DRAFT_RP8_v1.0_Report_Redacted.pdf

Hi all,

Just a quick reminder that the comment period for the Woodlawn ACHA closes **next Friday 15 October 2021**; I have attached the report body to this email, and the report and appendix is available for download at this link: Woodlawn ARC

Thank you to those who have provided feedback to date, it is much appreciated.

Cheers,
Georgia

Georgia Burnett
Archaeologist

T 02 9493 9500
M 0459 295 806
www.emmconsulting.com.au

From: Georgia Burnett
Sent: Friday, 17 September 2021 6:33 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: Woodlawn ARC - Draft ACHA for review

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Cheers,
Georgia

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Georgia Burnett

From: Shayne Dickson <[redacted]
Sent: Friday, 8 October 2021 4:34 PM
To: Georgia Burnett
Cc: Alan Williams
Subject: Re: Woodlawn ARC - Draft ACHA for review

CAUTION: This email originated outside of the Organisation.

Hi Georgia
It's Shayne Dickson from Gunjeewong cultural Heritage corps
I have read through the drafts for the woodland project and are happy to proceed
Thank you
Shayne Dickson [redacted]
Director

From: Georgia Burnett <gburnett@emmconsulting.com.au>
Sent: Friday, 8 October 2021 1:33 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: RE: Woodlawn ARC - Draft ACHA for review

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Cheers,
Georgia

Georgia Burnett
Archaeologist

T 02 9493 9500
M 0459 295 806
www.emmconsulting.com.au

From: Georgia Burnett
Sent: Friday, 17 September 2021 6:33 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: Woodlawn ARC - Draft ACHA for review

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Georgia Burnett

From: Ngunawal Heritage Aboriginal Corporation <[redacted]
Sent: Sunday, 10 October 2021 11:10 AM
To: Georgia Burnett
Cc: Alan Williams
Subject: Re: Woodlawn ARC - Draft ACHA for review

CAUTION: This email originated outside of the Organisation.

Hi Georgia,

Thank you for providing us with a copy of the Woodlawn ACHA report.

We agree with the proposed recommendations listed in 10.3 of the ACHA report ensuring they are fully implemented with ongoing updates provided as required.

It is important to be consistent with current guidelines and requirements when developing strategies and to actively involve Aboriginal stakeholders whenever Aboriginal heritage may be impacted by any proposed works. This will help to ensure duty of care to all Aboriginal heritage with best practice and provide a positive outcome for all parties involved.

We look forward to continually working with you on this project. If you require any further information please let us know.

Kind Regards

Dean Delponte
Director
[redacted]

Ngunawal Heritage Aboriginal Corporation

Ngunawal Heritage Aboriginal Corporation

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On Fri, Oct 8, 2021 at 1:33 PM Georgia Burnett <gburnett@emmconsulting.com.au> wrote:

> Hi all,

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Woodlawn ARC

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Cheers,

Georgia

Georgia Burnett
Archaeologist

T 02 9493 9500

M 0459 295 806

www.emmconsulting.com.au

From: Georgia Burnett
Sent: Friday, 17 September 2021 6:33 PM
Cc: Alan Williams <awilliams@emmconsulting.com.au>
Subject: Woodlawn ARC - Draft ACHA for review

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Annexure C

Historical aerial photographs

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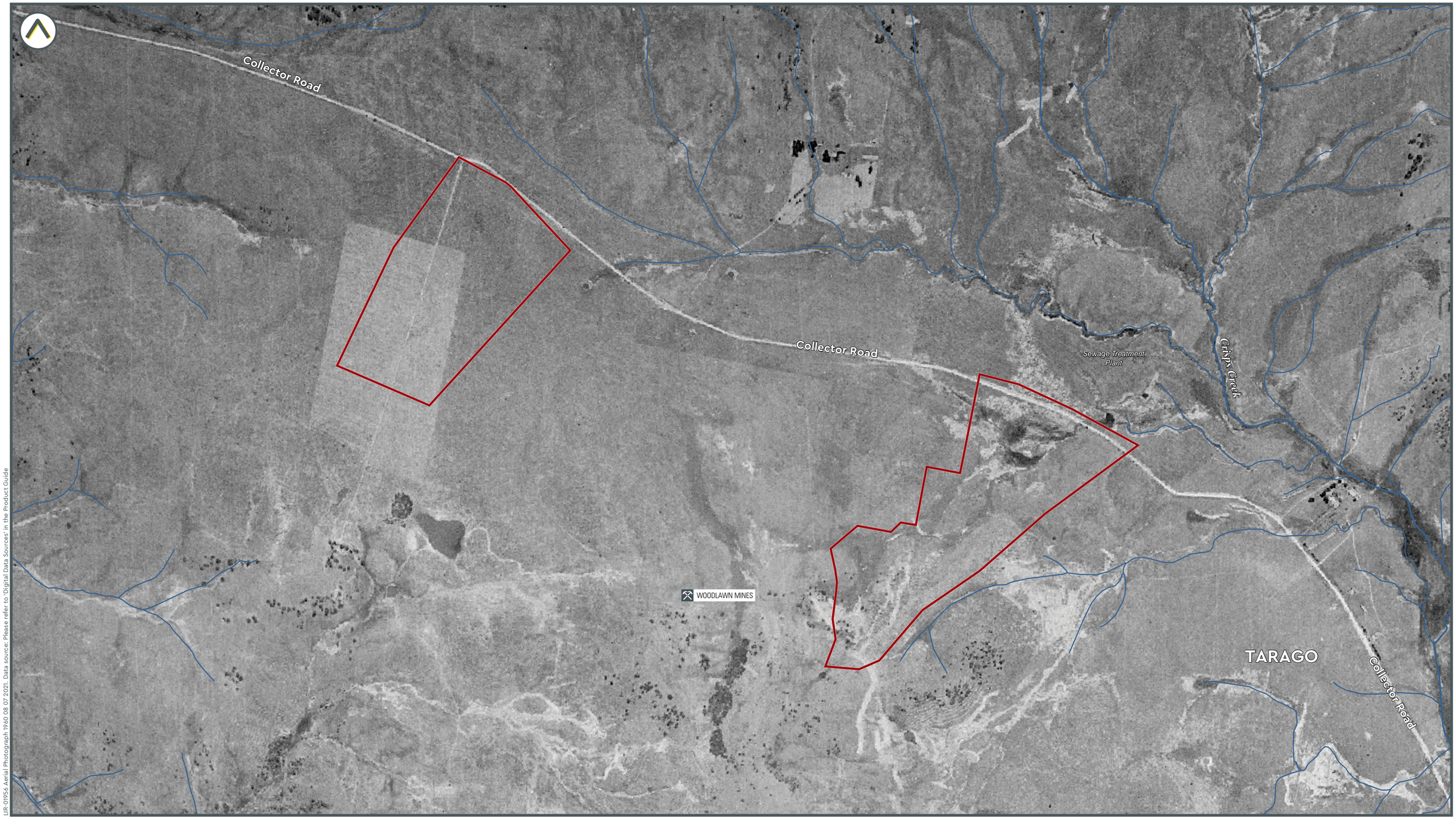
HISTORIC AERIAL PHOTOGRAPH - 1960

Imagery Insight



LIR-01956 Aerial Photograph 1960 08 07 2021. Data source: Please refer to 'Digital Data Sources' in the Product Guide

Subject area

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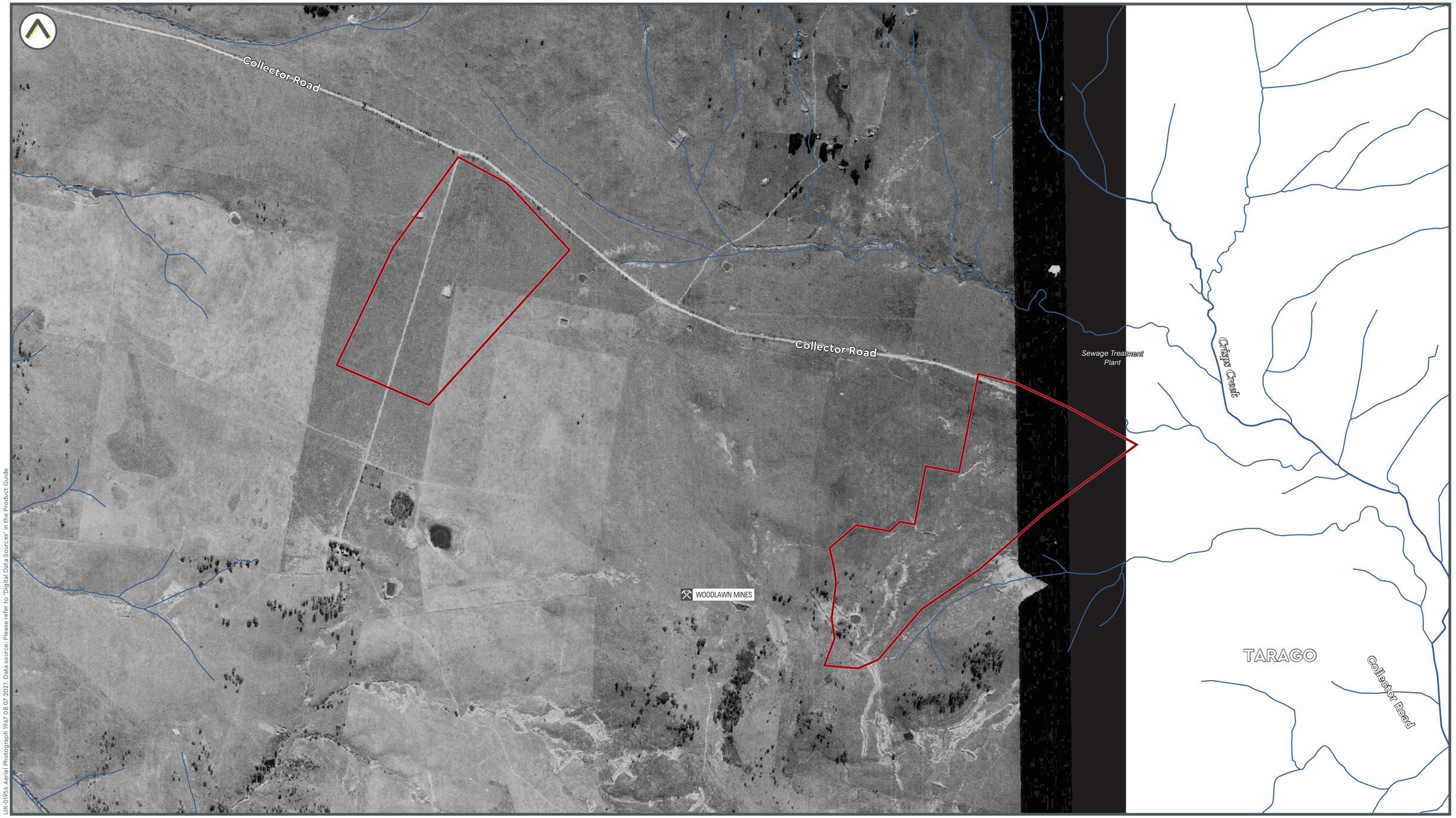
HISTORIC AERIAL PHOTOGRAPH - 1967

Imagery Insight



LIR-01956 Aerial Photograph 1967 08 07 2021. Data source: Please refer to 'Digital Data Sources' in the Product Guide

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HISTORIC AERIAL PHOTOGRAPH - 1985

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HISTORIC AERIAL PHOTOGRAPH - 1991

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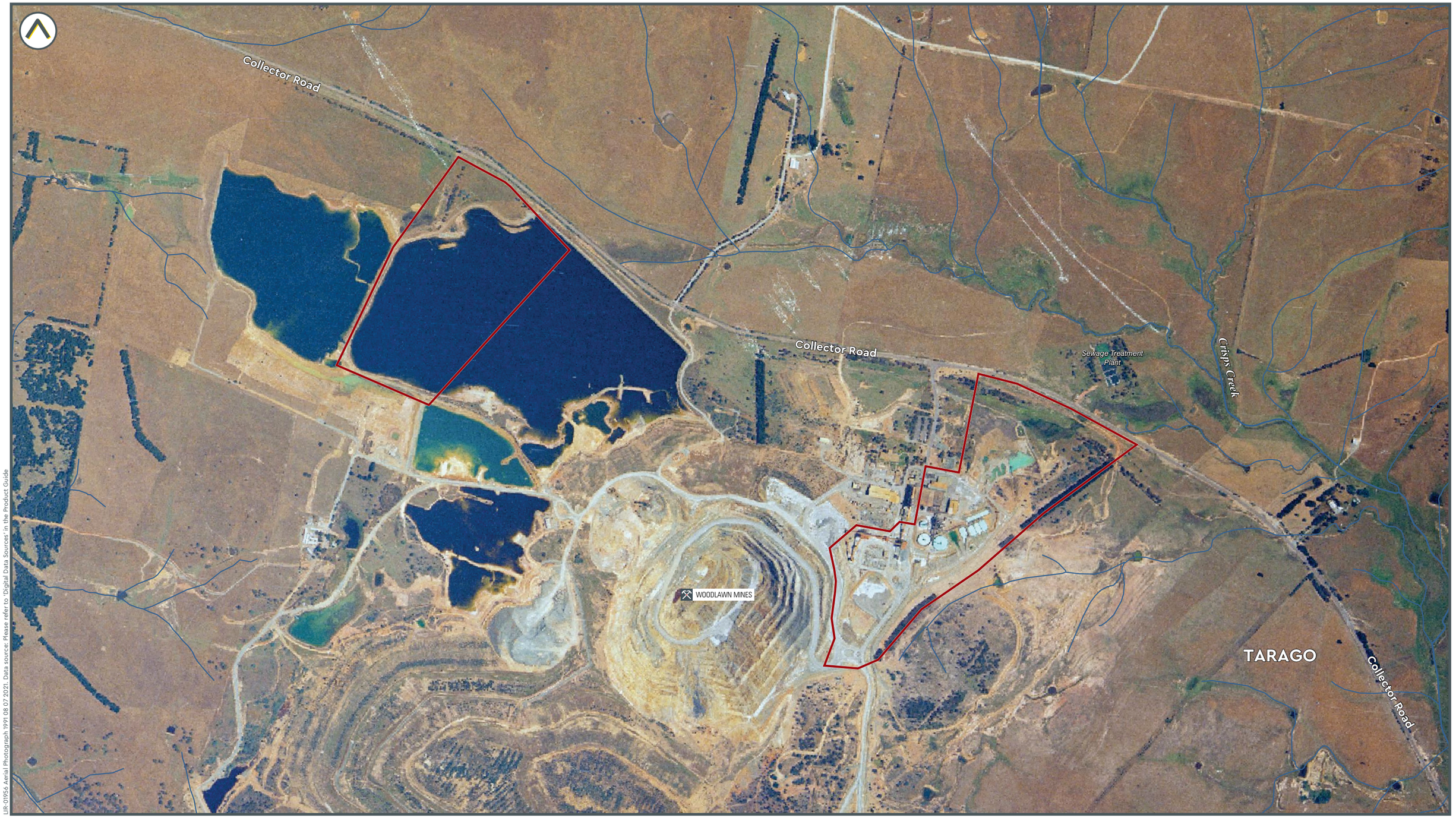
HISTORIC AERIAL PHOTOGRAPH - 1997

Imagery Insight



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Subject area

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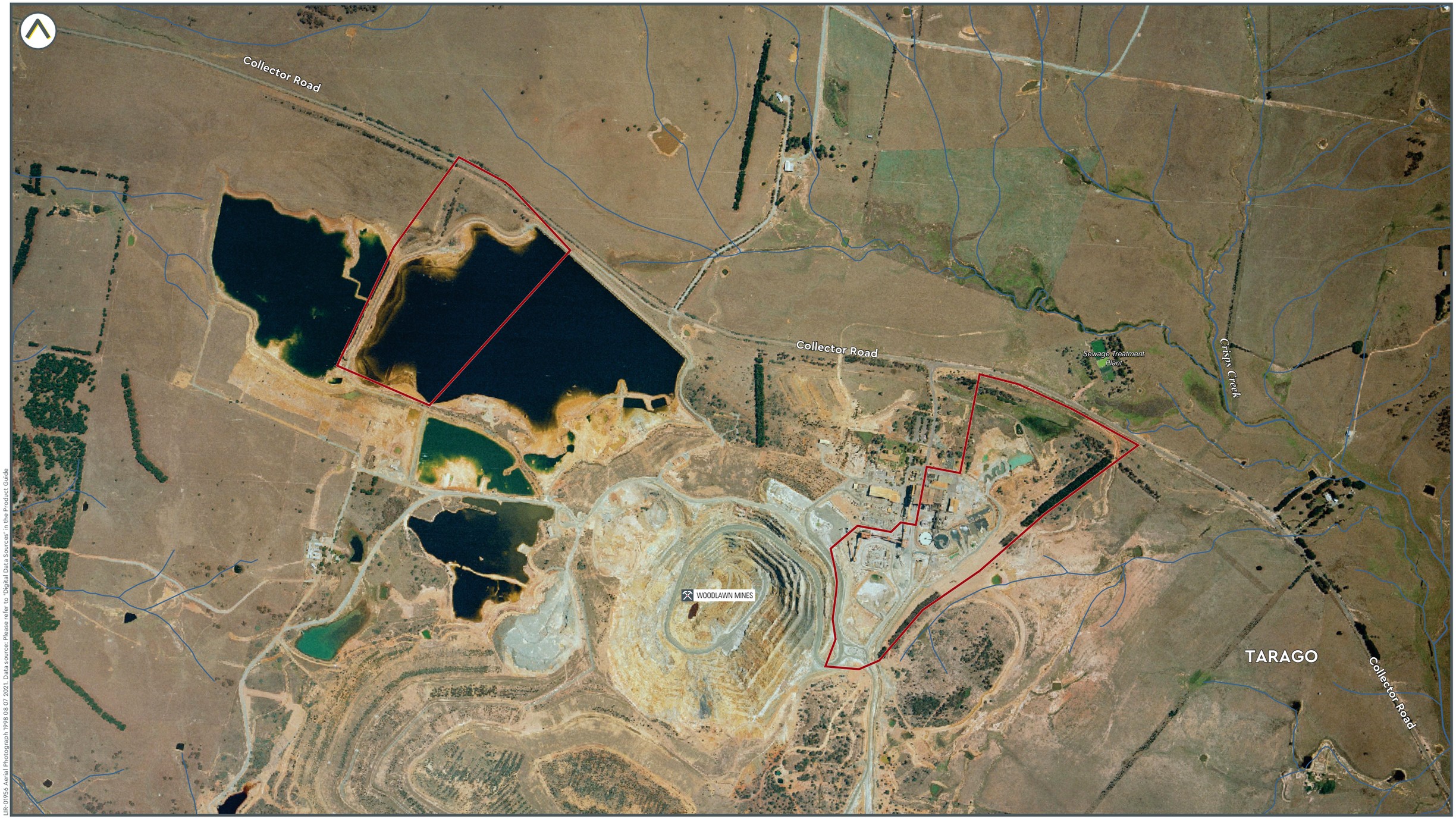
HISTORIC AERIAL PHOTOGRAPH - 1998

Imagery Insight



Subject area

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LIR-01956 Aerial Photograph 1998 08 07 2021. Data source: Please refer to 'Digital Data Sources' in the Product Guide

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HISTORIC AERIAL PHOTOGRAPH - 2008

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Subject area

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LR-01956 Aerial Photograph 12008 08 07 2021. Data source: Please refer to 'Digital Data Sources' in the Product Guide

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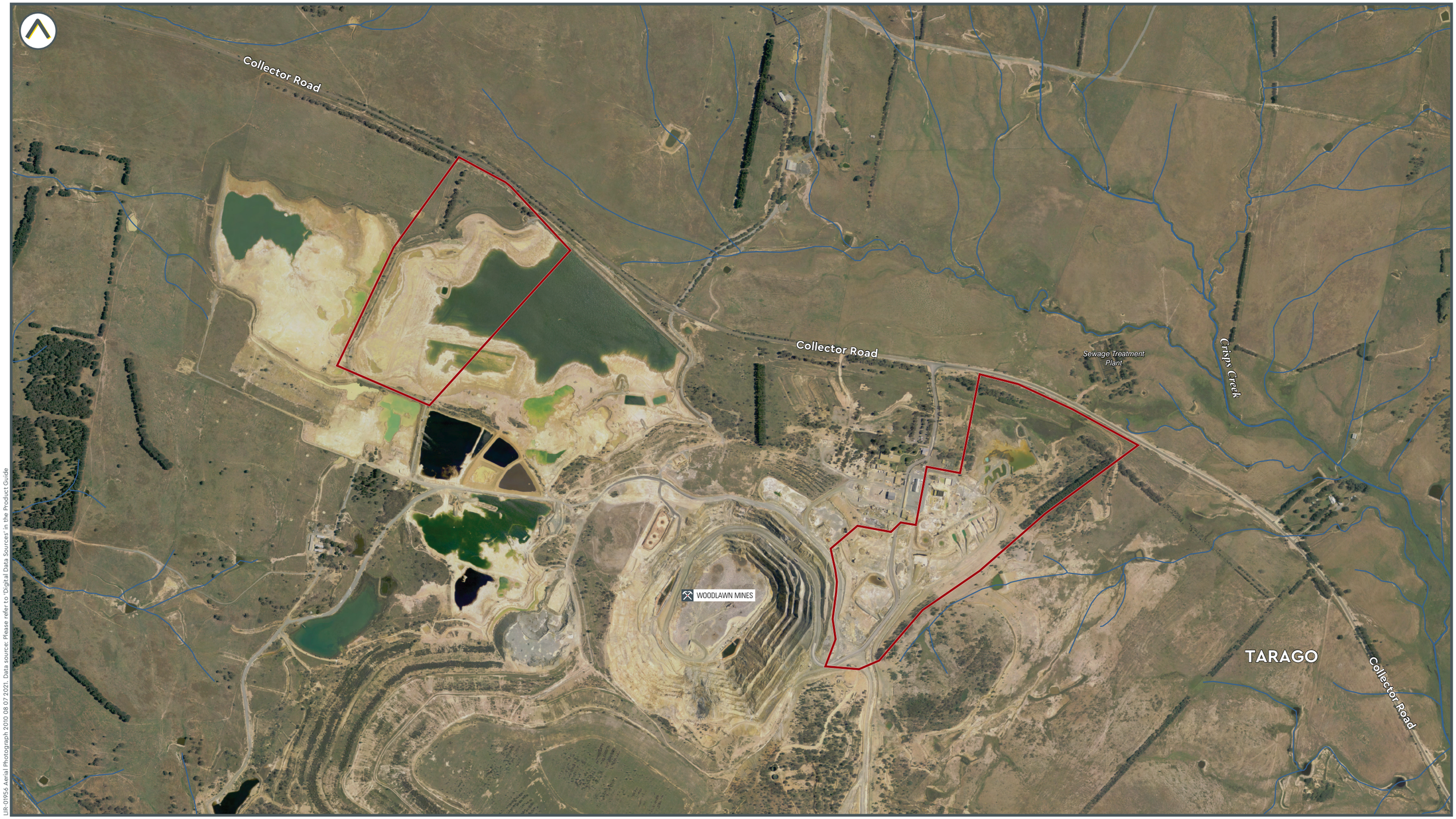
HISTORIC AERIAL PHOTOGRAPH - 2010

Imagery Insight



UR-01956 Aerial Photograph 2010 08 07 2021. Data source: Please refer to 'Digital Data Sources' in the Product Guide

Subject area

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HISTORIC AERIAL PHOTOGRAPH - 2014

Imagery Insight



UR-01956 Aerial Photograph 2014 08 07 2021. Data source: Please refer to 'Digital Data Sources' in the Product Guide

Subject area

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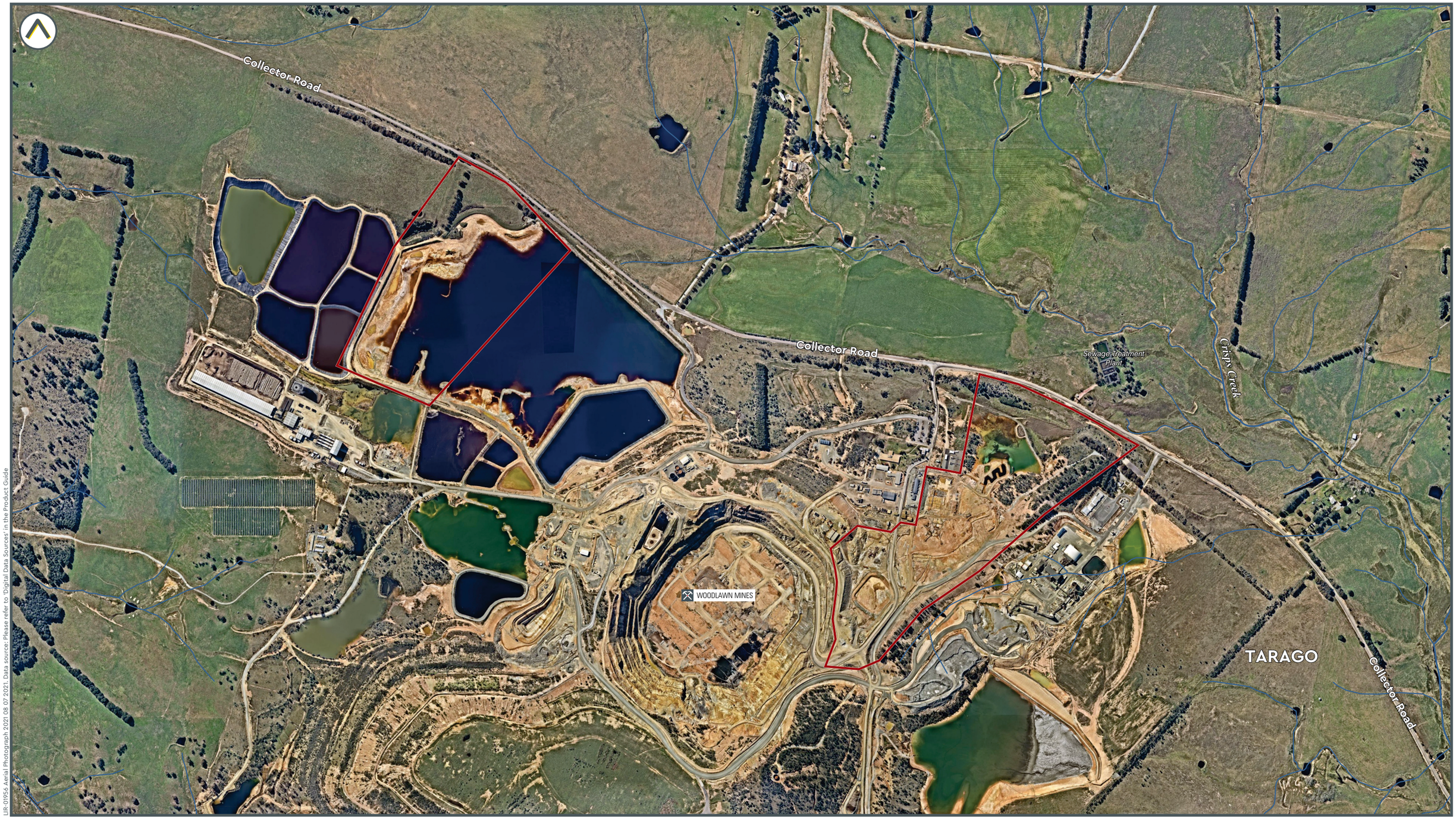
HISTORIC AERIAL PHOTOGRAPH - 2021

Imagery Insight



LIR-01956 Aerial Photograph 2021 08 07 2021. Data source: Please refer to 'Digital Data Sources' in the Product Guide

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Annexure D

Additional archaeological information

EMM
creating opportunities

D.1 Site definitions and recording methods used for this assessment

D.1.1 Aboriginal sites

In the AHIMS database, Aboriginal sites are defined in several ways. At the simplest level, sites are recorded as 'closed' or 'open'. Closed sites are associated with rockshelters and include other evidence of Aboriginal occupation that may be present, such as areas where subsurface Aboriginal objects may occur within the shelter ('potential archaeological deposit' (PAD)), faunal remains, and art on the shelter walls (paintings/engravings). Open sites are broadly defined and encompass all other types of Aboriginal site features that are located in areas where there is no rockshelter. The most common open site features found generally include artefacts, grinding grooves, art, culturally modified trees, and shell deposits (middens) (OEH 2012). The presence or absence of stone artefacts is often a defining factor in site identification, with almost every site likely to have at least some associated artefacts, as discard or loss of this most ubiquitous and practically indestructible marker of past Aboriginal visitation.

Any one site (or group of linked sites described as a 'complex') can contain several different site features. For example, a shelter may have art on the walls, artefacts on the floor surface or outside the shelter, and be predicted to contain faunal remains and further artefacts in the accumulated deposit inside.

A description of terms used to describe different site features known to occur in the vicinity of the study area is provided in Table D.1 and use definitions provided by OEH and those adopted by EMM in their field investigations to ensure consistency in recording. Similarly, there may be places of contemporary significance to Aboriginal people in the region and that will require consultation with this community to identify.

Table D.1 Site definitions and recording

Site feature	Definition and recording methods
Aboriginal ceremony and Dreaming	Previously referred to as mythological sites these are spiritual/story places where no physical evidence of previous use of the place may occur; e.g., natural unmodified landscape features, ceremonial or spiritual areas, men's/women's sites, dreaming (creation) tracks, marriage places etc.
Artefact site (open stone artefact site)	Objects such as stone tools, and associated flaked material, spears, manuports, grindstones, discarded stone flakes, modified glass or shell demonstrating evidence of use of the area by Aboriginal people. Open stone artefact sites were defined by the presence of one (isolated find) or more (artefact scatter) stone artefacts visible on the ground surface. The boundaries of a site are limited to the spatial extent of the visible stone artefacts. The mapped site points and/or 'site areas' do not represent the areas of potential archaeological deposit (PAD) that also apply to some sites (refer to the term 'PAD' below). Open stone artefact sites were recorded by marking each artefact location or each cluster of artefacts within a 5 m radius as a separate waypoint in the GPS. Site boundaries were allocated by drawing a line around the cluster waypoints for each site using ArcGIS software. Stone artefacts more than 50 m apart were recorded as separate sites. EMM acknowledges that the 50 m rule applied here is an arbitrary distinction for site boundaries and is used mainly for efficiencies in site management and to establish consistency in site recording methods
Burials	A traditional or contemporary (post-contact) burial of an Aboriginal person, which may occur outside designated cemeteries and may not be marked; e.g., in caves, marked by stone cairns, in sand areas, along creek banks etc.

Table D.1 Site definitions and recording

Site feature	Definition and recording methods
Fish trap	A modified area on watercourses where fish were trapped for short-term storage and gathering.
Grinding grooves	Grinding grooves were defined as an area of outcropping bedrock containing evidence of one or more grinding grooves where ground-stone hatchets or other grinding practices (ie seed grinding) were implemented.
Habitation structure	Structures constructed by Aboriginal people for short- or long-term shelter. More temporary structures are commonly preserved away from the NSW coastline, may include historic camps of contemporary significance. Smaller structures may make use of natural materials such as branches, logs and bark sheets or manufactured materials such as corrugated iron to form shelters. Archaeological remains of a former structure such as chimney/fireplace, raised earth building platform, excavated pits, rubble mounds etc.
Modified tree (carved or scarred)	Trees which show the marks of modification as a result of cutting of bark from the trunk for use in the production of shields, canoes, boomerangs, burials shrouds, for medicinal purposes, foot holds etc., or alternately intentional carving of the heartwood of the tree to form a permanent marker to indicate ceremonial use/significance of a nearby area, again these carvings may also act as territorial or burial markers. Modified trees (either carved or scarred) can be difficult to identify. Scars commonly occur on trees through natural processes such a branch tears, insect damage, storm and fire damage and faunal damage. Scars can also occur from mechanical damage from vehicles or farming equipment. The attributes of potential scarred trees were discussed during the survey amongst archaeologists and RAPs before it was decided if a scar would be recorded or not. A precautionary approach was adopted, whereby some of the more ambiguous examples were recorded anyway. The assessment of scar trees was made from the experience of the survey team and the guideline Aboriginal scarred trees in New South Wales: a field manual (DEC 2005). In some of the more ambiguous examples, it cannot be verified whether some scars recorded during the survey are of natural or Aboriginal origin. In such instances, an expert evaluation by a scar tree expert (aborist or other) would be required to determine the status of certain trees.
Potential archaeological deposit (PAD)	An area where Aboriginal objects may occur below the ground surface. The term 'potential archaeological deposit' was first applied in Sydney regional archaeology in the 1980s, and referred to rockshelters that were large enough and contained enough accumulated deposit to allow archaeologists to predict that subsurface cultural material was likely to be present. Since then the term has come to include open sites where the same prediction can be made. EMM has defined PADs as the predicted extent of concentrated subsurface Aboriginal objects in a particular area. PADs are not technically Aboriginal sites until, and if, subsurface Aboriginal objects are identified, which is typically established through archaeological test excavation. PAD areas have been assigned to landforms that are distinguishable from the surrounding landscape (eg elevated areas with good outlook overlooking watercourses) as being likely to retain higher artefact densities than the assumed 'background scatter' of archaeological material in the broader landscape. The identification of PADs associated with Aboriginal open camp sites was partly based on observations in the field and discussions with RAPs, but also related to the predictive model. Although PAD was attributed to areas for a variety of reasons, the main qualifiers were: • The presence of surface artefacts or other Aboriginal objects. Ground surface visibility as part of the archaeological survey effort was typically considered high enough in each PAD area to identify at least one or more surface artefacts thereby indicating likelihood of subsurface potential. Notwithstanding, finding no visible surface artefacts in an area would not disqualify an area from being attributed with PAD. • Level to gently inclined ground (<10%) indicating suitable camping or activity areas. • Contours that distinguish the landforms with PAD from the surrounding landscape (eg spur crest, hill crest or knoll). Landform boundaries were also interpreted through observations in the field. Notably, rocky crest landforms that were protected from intensive cultivation were often attributed with PAD. • Proximity to water: typically up to 100 m from 1st and 2nd order streams and up to 200 m from 3rd order streams and above. Elevated landforms at the confluence of higher order streams were also more likely to be attributed with PAD. EMM acknowledges that all PAD areas have been historically cleared of native vegetation and some have been subject to pasture improvements such as ploughing. As such, the term PAD does not assume high subsurface integrity; instead it is a prediction of potential subsurface artefact concentrations.

Table D.1 Site definitions and recording

Site feature	Definition and recording methods
	All stone quarry sites are predicted to have PAD. The assumption is that in most cases the visible surface material at quarries is represented by larger artefacts (such as cores) and that smaller material (eg flakes) is likely to be buried.
Restricted	Site information contained in the Aboriginal Heritage Information Management System is available only to certain authorised groups of people, as requested by the Aboriginal community. Detailed information may not be available in search reports.
Shell	An accumulation or deposit of shellfish from beach, estuarine, lacustrine or riverine species resulting from Aboriginal gathering or consumption. Usually found in deposits previously referred to as shell middens. Must be found in association with other objects like stone tools, fish bones, charcoal, fireplaces/hearths, and burials. Will vary greatly in size and composition.
Stone quarry	Usually a source of good quality stone which is quarried and used for the production of stone tools. Stone quarries represent where Aboriginal people gathered raw stone materials for stone tools and/or manufactured stone tools from the adjacent source material. Quarry sites are found at rock outcrops where the material was of suitable quality to have been used to manufacture stone tools. Stone quarries were defined by the presence of outcropping stone material with nearby evidence of the same material type used in the stone tool manufacture process. This was most commonly indicated by large stone cores or stone flakes distributed amongst the same naturally outcropping material. EMM acknowledges that the 'open stone artefact' site type shares some of the same characteristics as 'stone quarries', such as the presence of stone artefacts. However, they have been distinguished from each other because quarries can not only represent open camping activities, but also a fixed location where Aboriginal people needed to visit to extract a resource. In contrast, the location of typical open camp sites were not fixed, but chosen by Aboriginal people for their favourable conditions.

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