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This submission is for Santos Narrabri Gas Project Development Application including Environment Impact Statement

I Lynn Trindall write this submission as the Chief Executive Officer of Narrabri LALC, under the ALRA 1983 our job is to protect our Culture and Heritage.

Previously Narrabri Local Aboriginal Land Council had submitted a report for 20th October 2015 - final report prepared by Central Queensland Cultural Heritage Management Pty Ltd, for Aboriginal Cultural Heritage Assessment for Narrabri Gas Project. Following this draft report there will be new additions added to assist with future of engagement and directions to work with the Proponent to protect Culture and Heritage within Narrabri Local Aboriginal Land Council boundary.

After reading the draft report prepared by Central Queensland Cultural Heritage Management Pty Ltd, for Aboriginal Cultural Heritage Assessment for Narrabri Gas Project.

Narrabri Local Aboriginal Land Council would like firstly to state this project operates within our land and boundary as Gazetted under the NSW Aboriginal Land Rights Act 1983 for the past 32 years we have been working to make our community for the betterment of all Aboriginal people and work closely with the wider community and organisations. As we have 95% of land within this project the impact on Culture and Heritage protection within this boundary is of the utmost importance.

There are rules on Culture and Heritage Management within our organisation, firstly for the protection. Many of our 228 members are knowledge holders, accredited Sites Workers and also local Gomerioi Traditional Owners and members who have close connection to this country. This land is in safe keeping for all to share. Our members are the people who make decisions for Narrabri Local Aboriginal Land Council.

We have been involved with Cultural and Heritage Protection with Eastern Star Gas prior to the Brigalow Belt South Bioregion Assessments 2002. Through this process we had the opportunity of ensuring Culture and Heritage was a priority and protected, before all works would commence. When Santos Pty Ltd had taken over from Eastern Star Gas initial meetings were held and since with the development of new Culture and Heritage Protection.

Narrabri Local Aboriginal Land Council registered all 228 members as interested parties, to give an opportunity of speaking in relation to the project and the development of the CHMP. Community Forums were held as information sessions, other RAP's also attended to gather and give views on the project. The appropriateness and thoroughness of the community consultations whether they were informal or organised sessions, were a must and at these meetings there was an opportunity for verbal submissions. The main focus was for culturally appropriate recognition of the importance of protection of sites and the significance of each one individually. And given the nature of the project – be ongoing, incremental footprint has already been put into place. The impact assessment was robust and management measures practical.

Narrabri Local Aboriginal Land Council appreciates the role Santos played in pulling together all the cultural heritage information from the various studies into one place, providing it to the Narrabri Local Aboriginal Land Council (with resources to manage it) and thus empowering us to have a role in decision making, continuing to walk country, assessing our heritage and having control over the information relating to it. We fully support the approach because of this has it given us the opportunity and a focus to be able to be negotiating better outcomes for protection of our Culture and Heritage.

The consultation draft (18/11/2014) for Cultural Heritage Management Plan Narrabri Gas Project is information that has been put forward from Community Forums meetings with other interested parties.

There is a general consensus on certain ideas from all Community Forums as this information was shared. Narrabri Local Aboriginal Land Council is in support of the CHMP and the implementation, however in relation to Aboriginal Cultural Heritage Working Group (ACHWG).

Please note the following:

1. Narrabri Local Aboriginal Land Council should be engaged as the organisation to manage this project as well as be Cultural Heritage Coordinator
 - Utilising the current system GIS mapping all information is in our control
2. Membership Governance
 - Santos or an Independent Chair
 - N.L.A.L.C (3 reps)
 - Gomeri NT (4 reps)
 - Wee Waa LALC (1 rep), however if WWLALC is not operating as per RAS (NSWALC regulations fully funded) Local GOMEROI Narrabri Aboriginal Corporation representative
3. Rules on Culture and Heritage for Aboriginal People
 - Sites workers will consist of people from throughout the Nation
 - A register of sites workers will be developed from all RAP's
 - Identified protestors against the project not be engaged for works
4. The "roles" for Santos for the activity.
 - Avoidance
 - Commitment
 - Avoidance/Principle
 - Disturbance – gets surveyed
 - Work program
 - What, where, when, how
 - Pre meeting
 - Agree arrangement
 - Pre-clearance survey
 - Assessment, findings recommendation (CHWG)
 - Santos updating Narrabri Local Aboriginal Land Council with any new information of any new sites recorded.

Our main focus with working closely with Gomeri NT Applicants is specifically for Culture and Heritage Management. Narrabri Local Aboriginal Land Council fully supports the opportunity of Gomeri NT Applicants negotiating with Santos for better outcomes financially for their group; however we feel that we as the Narrabri Local Aboriginal Land Council will become a commercial business within this project this will give us the opportunity of assisting the local Gomeri Narrabri Aboriginal Corporation.

As stated prior this project operates mainly within Narrabri Local Aboriginal Land Council Boundary and has worked closely with Eastern Star Gas and Santos Pty Ltd for the protection of our Culture and Heritage.

I would like to also say on behalf of Narrabri Local Aboriginal Land Council majority of the members fully support this project.

Santos Narrabri Gas Project Development Application including Environment Impact Statement Chapter 20

Narrabri Local Aboriginal Land Council would like firstly to state this project operates within our land and boundary as Gazetted under the NSW Aboriginal Land Rights Act 1983 for the past 34 years we have been working to make our community for the betterment of all Aboriginal people and work closely with the wider community and organisations. As we have 95% of land within this project the impact on Culture and Heritage protection within this boundary is of the utmost importance.

There are rules on Culture and Heritage Management within our organisation, firstly for the protection. Our 228 memberships has now increased to 276 many of these members are knowledge holders, accredited Sites Workers and also local Gomeroi Narrabri Aboriginal Corporation (GNAC) Traditional Owners as well as Gomeroi Applicants and members who have close connection to this country. This land is in safe keeping for all to share. Our members are the people who make decisions for Narrabri Local Aboriginal Land Council. We also discuss options with the Gomeroi Applicants.

Narrabri Local Aboriginal Land Council is in support of the CHMP and the implementation, however in relation to Aboriginal Cultural Heritage Working Group (ACHWG). The recommendation made in the draft report CQCHM 20th October 2015 there was a proposal put forward. After further discussions with Members and Community there needs to be changes.

Many discussions where made with Santos representatives in relation to how we as Narrabri Local Aboriginal Land Council can gain an initiative for commercial development over the term of the project. And it would be gained through the ACHWG and Native Title Applicants would gain financially from the project. There are two recognised groups within this project that being Gomeroi Native Title Applicants and Narrabri Local Aboriginal Land Council plus individual RAP's.

Comparison of Land Rights and Native Title in NSW

In NSW there are two key mechanisms by which Aboriginal peoples can have their rights recognised in land – the New South Wales Aboriginal Land Rights Act 1983 and Native Title Act 1993. While these systems are both about recognising and providing for Aboriginal peoples 'rights, the two systems operate under two different laws and differ in the rights they can provide. Native title and Aboriginal land rights can sometimes exist in the same land. It is important that Local Aboriginal Land Councils and Native title Claimants work together to obtain the best of both schemes. New South Wales Aboriginal Land Council had managed the Native Title Services Unit until 1996 because there was a conflict of interest. Native Title Services Unit then became NTsCORP. There are many differences but many similarities of both Acts.

In principal to the new EIS for Santos options have stayed the same and the main focus is to protect Culture and Heritage.

20.1 Methodology

There are many facets of this EIS which covers many aspects of Culture and Heritage and the management of it in future years.

The ground trooping was a significant asset throughout this process as the Aboriginal Heritage Information Management System that Narrabri LALC owns has is more accurate than others systems.

20.1.1 Aboriginal consultation

The consultation process with community and community forums brought together 3 communities for input proposed methodology and methodologies for cultural heritage assessments. A draft Cultural Heritage Management Plan was issued to the RAP's.

I will say at this point the Aboriginal people involved the Community forums are the most educated on the Project. Even the wider community had the opportunity as the Aboriginal Community but, many didn't take the option of attending other forums.

In the original draft by CQCHM October 2015 there were submissions made by various RAP's and the general consensus is the protection of Culture and Heritage.

20.1.2 Data audit

It is very important that buffer zones are now in place as this gives more protection of existing sites and others that will be recorded throughout the project.

20.1.3 BBSB study and oral history

Narrabri LALC were actively involved with the BBSB study and oral history (RACAC 2002) also many of the older generations had contributed to the study. History was once again recorded for our future. I would like to pay my respect to those that contributed as many now have passed away.

20.1.4 Stie verification and field surveys

As most of the recording for sites had been recorded through the BBSB and have been held in safe keeping, this then had to be ground trooped for accuracy.

Through this process Narrabri LALC now have a GIS mapping system with all our land within our Boundary.

20.1.5 Landscape sensitivity mapping and Aboriginal cultural heritage zoning

Cultural mapping and landscape is how we acknowledge what maybe in a similar landscape as one previously surveyed. Cultural sites assist with practices and what protection may be consider for the future.

20.1.6 Aboriginal Cultural Heritage Management Plan

The Cultural heritage management plan was reviewed many times. Santos will ensure the plan will protect and manage Cultural and heritage.

OFFSETS

This is an opportunity for Narrabri LALC to be able to use some of it land for offsets, where it be biodiversity, culturally appropriate offsets and a way to ensure our land is there for future generations.

Please note the following and the changes to the original draft on the Aboriginal Cultural Heritage Working Group terms of reference.

1. Narrabri Local Aboriginal Land Council should be engaged as the organisation to manage this project as well as be Cultural Heritage Coordinator

- We are an organisation already set up as a small business with all obligations to various departments
- Narrabri LALC has been operating for 34 years.
- Working closely with existing industries to protect culture and Heritiage
- Membership is growing more experience when required.
- Utilising the current system GIS mapping all information is in our control

2. Membership Governance

- Santos or an Independent Chair
- Narrabri LALC (3 reps) Wee Waa LALC (1 rep but not a Gomerioi Applicant) 4 in total
- Gomerioi NT (3 reps) (1 rep) Gomerioi Narrabri Aboriginal Corporation GNAC) 4 in total

3. Rules on Culture and Heritage for Aboriginal People

- Sites workers will consist of Narrabri LALC, GNAC members, Gomerioi Claimants as Gomerioi Applicants should not be only Gomerioi people employed.
- A register of sites workers will be developed from all RAP's
- Identified protestors against the project will not be engaged for works

4. The “roles” for Santos for the activity.

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As stated prior this project operates mainly within Narrabri Local Aboriginal Land Council Boundary and has worked closely with Eastern Star Gas and Santos Pty Ltd for the protection of our Culture and Heritage.

Conclusion

It is evident that we as a group of Aboriginal Stakeholders in the process are making a clear statement of protecting Culture and Heritage within the project. And as a group we will be ensuring avoidance of sites and that sites workers will be monitoring or surveying all areas before construction begins.

And that the ACHWG should be operated by Narrabri LALC as a commercial development, and offsets can be beneficial to each community (eg: scholarships etc) within the Gomeri NT.

Lynn Trindall
Chief Executive Officer
Narrabri Local Aboriginal Land Council
22nd May 2017