

Prepared for Samsung C&T Renewable Energy Australia Pty Ltd

Aboriginal Cultural Heritage Assessment

South Coree Battery Energy Storage System

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Berrigan Shire Local Government Area

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Revision	Date	Prepared by	Approved by
Draft v1.0	6/03/2025	Dr Tessa Bryant	Kirsten Bradley
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Acronyms and abbreviations

ACHA	Aboriginal Cultural Heritage Assessment
ACHCRP	Aboriginal Cultural Heritage Consultation Requirements for Proponents
ACHM	Australian Cultural Heritage Management
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
ARG	Aboriginal Resource and Gathering
BESS	Battery energy storage system
DD	Aboriginal Due Diligence Assessment
DP	Deposited Plan
DPHI	NSW Department of Planning, Housing and Infrastructure
EMS	Environment Management System
EP&A Act	<i>Environmental Planning and Assessment Act 1979 (NSW)</i>
ESD	Ecologically Sustainable Development
ha	hectare
Heritage Act	<i>Heritage Act 1977 (NSW)</i>
IBRA	Interim Biogeographic Regionalisation for Australia
km	kilometres
LGA	Local Government Area
MW	Megawatt
MWh	Megawatt hours
m	metres
NGH	NGH Pty Ltd
NPW Act	<i>National Parks and Wildlife Act 1974 (NSW)</i>
NSW	New South Wales
O&M	Operations and Maintenance
OzArk	OzArk Environmental and Heritage Management
PAD	Potential Archaeological Deposit
Project Site	Area of proposed development works for the Project
RAP	Registered Aboriginal Party
SEARs	Secretary's Environmental Assessment Requirements
SHI	State Heritage Inventory
SREA	Samsung C&T Renewable Energy Australia Pty Ltd
SSD	State Significant Development
the Proponent	Samsung C&T Renewable Energy Australia Pty Ltd

Executive summary

Introduction

NGH Pty Ltd (NGH) have been engaged by Samsung C&T Renewable Energy Australia (SREA) Pty Ltd (the Proponent) to undertake an Aboriginal Cultural Heritage Assessment (ACHA) for the proposed South Coree Battery Energy Storage System (the Project) located approximately 5 kilometres (km) west of the township of Finley in New South Wales (NSW) within the Berrigan Shire Local Government Area (LGA). The proposed works would involve the construction, operation and decommissioning of an 80 megawatt (MW) Battery Energy Storage System (BESS) that would provide a capacity of up to 320 megawatt hours (MWh). The BESS would supply electricity to the national energy market during peak periods.

The Project Site for the proposed BESS is located in Lot 4 DP 740920 with grid connections to the Transgrid Finley substation in Lot B DP961693. Site access from Broockmanns Road and 132kV transmission alignment will also be required along the southern side of Broockmanns Road between the BESS site and the substation. The maximum size of the proposed BESS site and associated transmission and site access works area (the Project Site) is approximately 13.65 hectares (ha) with a proposed development footprint of 9.37 ha. The Project is following the State Significant Development (SSD) planning pathway and the ACHA is being undertaken to form part of the Environmental Impact Statement (EIS) for the Project. The EIS will be submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) for assessment and subject to approval by the NSW Minister for Planning and Public Spaces.

The ACHA is being undertaken to investigate and examine the presence, extent and nature of any Aboriginal heritage objects within the proposed Project Site, assess the potential impacts to Aboriginal sites and provide management strategies that may mitigate any impacts. The ACHA is required to comply with the Secretary Environmental Assessment Requirements (SEARs) for the Project (SSD-77238990) which notes that the assessment for Aboriginal heritage must be prepared in accordance with the following guidelines:

- Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH 2011);
- Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010a); and
- Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW (DECCW 2010b).

Aboriginal community consultation

The consultation with Aboriginal stakeholders was undertaken in accordance with clause 60 of the *National Parks and Wildlife Amendment Regulation 2019* following the consultation steps outlined in *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010a) guidelines.

The full list of consultation steps, including those groups and individuals that were contacted, and a consultation log is provided in Appendix A. A copy of the draft report was provided to all the Registered Aboriginal Parties (RAPs) for comment.

Survey results

There are no previously recorded Aboriginal sites within or in close proximity to the Project Site. The survey of the Project Site by an archaeologist and RAP representatives identified no new Aboriginal sites. Ground surface visibility was generally good and there were exposures, particularly within the proposed BESS site, that indicated a generally shallow topsoil which has been impacted through past land disturbance and agricultural use. No areas within the Project Site were identified to have potential for archaeological deposits (PAD) or high archaeological sensitivity. Based on the topography, generally shallow soils, consideration of land disturbances and the predictive archaeological model from the local area it was determined that there is a low potential for subsurface Aboriginal archaeological deposits. No mature trees were present within the

Project Site. Overall, the Project Site was assessed as having low potential for Aboriginal heritage with no sites recorded within the Project Site. Further investigations (such as subsurface test excavation) for Aboriginal heritage were determined not to be warranted for the Project Site.

Potential impacts

No previously recorded Aboriginal sites are located within the Project Site and no new Aboriginal objects or sites were identified during the assessment. Given this, there will be no impacts to known Aboriginal objects or sites within the Project Site.

The construction activities associated with the development of the South Coree BESS will result in ground disturbance and any unexpected Aboriginal objects within the Project Site would likely be totally impacted. However, it is considered that there is a low potential for surface or subsurface stone artefacts to be present within the Project Site which would be harmed by the development proposal.

There are no known specific values (scientific, social or cultural, aesthetic or historic) within the Project Site that would be impacted by the development proposal for this Project.

Recommendations

It is recommended that:

1. No further archaeological assessment is warranted for the Project Site. All works must be within the area assessed for the Project.
2. Aboriginal heritage should be included within the Environment Management System (EMS) or equivalent for the Project. This must include an unexpected finds protocol for Aboriginal objects (see an example in Appendix B). Aboriginal heritage should also be included in any induction for the Project.
3. If unexpected Aboriginal objects are identified during works the relocation of the objects should be undertaken by a qualified archaeologist with a representative of the RAPs, as selected by the Proponent/Project Owner, and be consistent with Requirement 26 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*. The relocation area must be within the Subject Lots in an area that will not be disturbed into the future. If an alternative relocation area outside the Subject Lots for the Project is required due to unforeseeable reasons, additional consultation with the RAPs must occur.
4. In the unlikely event that human remains are discovered during the development works, all work must cease in the immediate vicinity and the unexpected find protocol followed. The local NSW police must be notified. Further assessment would be undertaken to determine if the remains were ancestral Aboriginal or not. In the event that any remains are determined to be ancestral Aboriginal in origin Heritage NSW must be notified.
5. Further archaeological assessment would be required if the proposed development activity extends beyond the area assessed. This would include consultation with the RAPs and may include further field survey.

All Aboriginal objects and places in NSW are protected under the *National Parks and Wildlife Act*. It is an offence to disturb an Aboriginal object or site without appropriate consent.

The Proponent should also note that consultation with the RAPs for the Project must be ongoing and maintained until the approval of this Project is issued by the relevant authority. Ongoing consultation with the RAPs has been defined by Heritage NSW for SSD Projects as comprising of consultation with no more than a maximum gap of six months between consultation events. This ongoing consultation with the RAPs until the approval of this Project must be appropriately documented and logged.

1. Introduction

NGH Pty Ltd (NGH) have been engaged by Samsung C&T Renewable Energy Australia (SREA) Pty Ltd (the Proponent) to undertake an Aboriginal Cultural Heritage Assessment (ACHA) for the proposed development of the South Corree Battery Energy Storage System (BESS) located approximately 5 km west of the township of Finley in New South Wales (NSW) within the Berrigan Shire Local Government Area (LGA). The proposed works would involve the construction, operation and decommissioning of an 80-megawatt (MW) Battery Energy Storage System (BESS) that would provide a capacity of up to 320 megawatt hours (MWh). The BESS would supply electricity to the national energy market during peak periods.

The Project Site for the proposed BESS is located in Lot 4 of DP 740920 with grid connections to the Transgrid Finley substation in Lot B DP961693 (see Figure 1-1). Site access from Broockmanns Road and 132kV transmission alignment will also be required along the southern side of Broockmanns Road between the BESS site and the substation.

The maximum size of the proposed BESS site and associated transmission and road corridor works area (the Project Site) is approximately 13.65 hectares (ha) with the proposed development footprint covering approximately 9.37 ha. The Project is following the State Significant Development (SSD) planning pathway and the ACHA is being undertaken to form part of the Environmental Impact Statement (EIS) for the Project. The EIS will be submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) for assessment and subject to approval by the NSW Minister for Planning and Public Spaces.

The ACHA is being undertaken to investigate and examine the presence, extent and nature of any Aboriginal heritage objects within the proposed Project Site, assess the potential impacts to Aboriginal sites and provide management strategies that may mitigate any impacts. The ACHA is required to comply with the Secretary's Environmental Assessment Requirements (SEARs) for the Project (SSD-77238990) which notes that the assessment for Aboriginal heritage must be prepared in accordance with the following guidelines:

- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011);
- *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (ACHCRP) (DECCW 2010a); and
- *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010b).

1.1 Description of development proposal

The Project Site is located approximately 5 km west of the township of Finley in the Berrigan Shire LGA and includes part of Lot 4 DP740920, with grid connections to Lot B DP961693 with site access from Broockmanns Road and 132kV transmission alignment along the southern side of Broockmanns Road between the BESS site and the substation (see Figure 1-2).

The Project comprises the installation, operation, maintenance and decommissioning/re-powering of a BESS, supported by ancillary infrastructure. The Project would have a capacity of up to 80 MW and a storage capacity of 320 megawatt hours (MWh).

A BESS is a device that stores excess energy by accumulating energy through reversible electrochemical reactions. The energy is stored/extracted in Direct Current (DC) and converted/inverted into Alternating Current (AC) by an accompanying bi-directional inverter sized to the storage capacity. The BESS system compensates for the intermittency of sources, providing backup power to address certain constraints such as weather conditions and lack of grid space. They are crucial to the increased adoption of dispersed energy sources and infrastructure, reducing the risk of widespread power outages.

This BESS is an SSD project that represents an important contribution to renewable energy storage in NSW. The development objectives centre on the construction of a viable and appropriate energy storage facility

that will provide a meaningful contribution to the state's transition to renewable energy. Additional storage provided by this Project will better integrate the contribution of renewables into the Australian transmission network and should act to stabilise the grid and drive prices down. Energy storage technologies can unlock electricity generation growth in areas experiencing network constraints. They will also support on-demand energy needs as the network transitions to more renewable sources of energy.

The development of energy storage facilities projects aligns with the NSW governments identification that batteries can increase the value of renewable energy to individuals, network operators and investors. Storage allows renewable energy investors to increase revenue by selling power at times of peak market prices as opposed to when the electricity is generated. This in turn places downward pressure on electricity prices by encouraging more supply at times of peak demand and reducing the need for additional distribution and transmission infrastructure.

The maximum size of the proposed BESS site, associated transmission and site access works area (the Project Site) is approximately 13.65 hectares (ha) with the proposed development footprint covering approximately 9.37 ha.

The Project would include, but not be limited to, the following key built form features:

- BESS including battery enclosures, inverters, transformers, switchgear and control room;
- Onsite substation including transformer switch bays and switchgear housed in portable substation containers;
- Underground and/or overhead 132 kV transmission lines to connect the BESS to the Finley substation;
- Finley substation upgrade works to facilitate connection with the BESS;
- Permanent office, operation and maintenance (O&M) buildings, hardstands and Project signage;
- Site access to the BESS from Broockmanns Road, internal site access tracks and parking;
- Landscaping;
- Stormwater management infrastructure, lighting, fencing and security.

These activities would require the use of heavy machinery and would cause ground disturbance. As such Aboriginal objects within the Project Site could therefore be subject to harm.

1.2 Statutory context

As part of the development impact assessment process, the proposed development application will be assessed under part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The proposed South Coree BESS is classified as an SSD project under Part 4 of the EP&A Act. SSDs are major projects which require approval from the NSW Minister for Planning and Public Spaces. As part of the relevant statutory considerations for the power to grant consent for the Project (a statutory requirement) also includes adherence to the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP). Section 20 of Schedule 1 of the Planning Systems SEPP (2021) states that the following is considered a SSD: *Development for the purpose of electricity generating works or heat or their co-generation (using any energy source, including gas, coal, biofuel, distillate, waste, hydro, wave, solar or wind power) that: (a) has a capital investment value of more than \$30 million...* 'Electricity generating works' as defined by the *Principal Local Environment Plan 2006* includes electricity storage which is what the BESS for this Project falls under. The Project would have a capital investment cost estimate of more than \$30 million. Therefore, the Project is classified as "State Significant Development" under division 4.7 of the EP&A Act.

The archaeological assessment of Aboriginal heritage will form part of the EIS for the Project to fulfil the requirements of the SEARs relating to Aboriginal heritage for SSD-77238990. The requirements noted for Aboriginal heritage in the SEARs were as follows:

- An Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011) and the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010a), identifying, describing, and assessing any impacts to Aboriginal cultural heritage sites or values associated with the sites (including impacts from any potential earth works, construction works and road upgrades), including results of archaeological test excavations (where required), undertaken in accordance with the relevant standards and requirements.
- Evidence of adequate consultation with Aboriginal communities in determining and assessing impacts, identifying and selecting options for avoidance of Aboriginal cultural heritage and identifying appropriate mitigation measures (including the final proposed measures), having regard to the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010b).

Aboriginal heritage is primarily protected under the *NSW National Parks and Wildlife Act 1974* (NPW Act) and as subsequently amended in 2010 with the introduction of the *National Parks and Wildlife Amendment (Aboriginal Objects and Places) Regulation 2010*. The aim of the NPW Act includes:

The conservation of objects, places or features (including biological diversity) of cultural value within the landscape, including but not limited to places, objects and features of significance to Aboriginal people.

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 the occupation of that area by persons on non-Aboriginal extraction and includes Aboriginal remains.

Part 6 of the NPW Act concerns Aboriginal objects and places and various sections describe the offences, defences and requirements to harm an Aboriginal object or place. The main offences under section 86 of the NPW Act are:

- A person must not harm or desecrate an object that the person knows is an Aboriginal object.
- A person must not harm an Aboriginal object.
- For the purposes of this section, "circumstances of aggravation" are:
 - that the offence was committed in the course of carrying out a commercial activity, or
 - that the offence was the second or subsequent occasion on which the offender was convicted of an offence under this section.
- A person must not harm or desecrate an Aboriginal place.

Section 89A of the Act also requires that a person who is aware of an Aboriginal object must notify the Director-General in a prescribed manner. In effect this section requires the completion of a site card to the NSW Aboriginal Heritage Information Management System (AHIMS) database for all Aboriginal sites located during heritage surveys in NSW.

Under Section 4.41 (1) (d) of the EP&A Act, section 90 of the NPW Act does not apply for this SSD project.

The EP&A Act is legislation for the management of development in NSW. It sets up a planning structure that requires developers (individuals or companies) to consider the environmental impacts of new proposals. Under this Act, cultural heritage is a part of the environment. This Act requires that Aboriginal cultural heritage and the possible impacts to Aboriginal heritage that development may have formally considered in land-use planning and development approval processes.

As part of the development impact assessment process, the proposed development application for this Project will be assessed under Part 4 of the EP&A Act. The proposed BESS is classified as SSD under Part 4 of the EP&A Act. Under Section 4.41 (1) (d) of the EP&A Act an Aboriginal Heritage Impact Permit (AHIP) is not required for SSD projects. SSD are major projects which require approval from the Minister for Planning and Public Spaces. The ACHA is undertaken to support the completion of an EIS to fulfil the requirements of the SEARs. The EIS will be submitted to the DPHI for assessment.

1.3 Objectives of assessment

The development of the Project will involve ground disturbance. Given this, there is potential to impact on Aboriginal heritage sites and objects, which are protected under the NPW Act. This report will investigate the presence of any Aboriginal sites within the Project Site, assess the impacts to Aboriginal sites within the Project Site and provide management strategies that may mitigate any impacts.

The purpose of this ACHA is to determine if Aboriginal objects and sites are to be harmed by the proposal and to fulfil the SEARs for Aboriginal heritage for this SSD project.

The objectives of the assessment were to:

- Conduct Aboriginal consultation as specified in clause 60 of the *National Parks and Wildlife Regulation 2019*, using the consultation process outlined in the ACHCRP;
- Undertake a field survey of the Project Site to identify and record any Aboriginal objects present and determine the potential for subsurface cultural material;
- Undertake an assessment of the archaeological and cultural values of the Project Site and any Aboriginal objects therein;
- Assess the cultural and scientific significance of any archaeological material within the Project Site;
- Assess the possible impacts of the development proposal on the Aboriginal objects and sites, and
- Provide management recommendations for any Aboriginal objects and sites found.

1.4 Investigation contributors

This ACHA report was completed by Dr Tessa Bryant (*NGH Senior Heritage Consultant - PHD with 12 years' experience*) who conducted fieldwork, mapping, Aboriginal community consultation and report preparation. Kirsten Bradley (*NGH Principal Heritage Consultant -BA Hons with 17 years' experience*) assisted with Aboriginal community consultation and reviewed the report for quality assurance purposes.

Consultation with the Aboriginal community was undertaken following the process outlined in the ACHCRP. The Registered Aboriginal Parties (RAPs) for this Project were:

- Bangerang Aboriginal Corporation;
- Cummeragunja Local Aboriginal Land Council (LALC);
- Deniliquin LALC;
- Girragirra Murun Aboriginal Corporation;
- Moama LALC;
- Southern West Yiradyuri Clans, Land, Water and Sky Country Aboriginal Corporation; and
- Thomas Dahlstrom.

In line with the ACHCRP, the Proponent chose to invite two Aboriginal groups who had registered their interest in the Project to attend fieldwork. The fieldwork participants were:

- Dr Tessa Bryant (NGH Senior Archaeologist);
- Representative #1 from Cummeragunja LALC; and

- Representative #2 from Bangerang Aboriginal Corporation.

Further details and an outline of the consultation process is provided in Section 3 of this report.

1.5 Report format

The ACHA report was prepared in accordance with the following guidelines:

- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011);
- *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010a); and
- *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010b).

This report is structured in accordance with the outline provided under Requirement 11 in the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010a). The report includes the following components:

- Section 1 – Background context for the project, details of the Project proposal and study objectives.
- Section 2 – Landscape context, details of previous archaeological studies, a site predictive model and summary of contextual information.
- Section 3 – Aboriginal community consultation
- Section 4 – Details of sampling strategy, field methodology, field results and discussion of results
- Section 5 – Significance Assessment
- Section 6 – Impact assessment
- Section 7 – Management and mitigation considerations
- Section 8 – Recommendations



Figure 1-1 General location of the Project Site.



Figure 1-2 Project Site, development footprint and indicative layout.

2. Description of the area

2.1 Project location

The Project Site would be located within the Berrigan Shire LGA, approximately 5 km west of the township of Finley and approximately 26 km west of Berrigan. The BESS site address is 384 Broockmanns Road, Finley NSW 2713. The Project Site is in the County of Denison in the Parish of Ulupna.

Channels associated with the Mulwala Canal run along the western and northern sides of the Project Site. The Mulwala Canal is the largest irrigation canal in the Southern Hemisphere, which supplies the southern Riverina towns for Berrigan, Finley, Bunnaloo and Wakool. It runs from Lake Mulwala for 156 km, across the Riverina plain to Deniliquin.

The Project Site includes rural farmland that is predominantly cleared. The proposed location of the BESS is used for agricultural purposes.

Lots and easements that are intersected by the Project Site that is being investigated for the Project are detailed in Table 2-1. The Project Site covers an area of approximately 13.65 ha, while the proposed development footprint covers approximately 9.37 ha.

Table 2-1 Lots and easements intersected by the Project

Proposed usage for the Project	Lot	Deposited Plan (DP) / easement	Development Footprint (ha)
Siting of the BESS, access tack, onsite substation, O&M Buildings and landscaping.	4	DP470920	4.24 ha
Grid connection and enabling works.	B	DP961693	3.76 ha
Site access from Broockmanns Road and transmission connection area.	Road corridors	N/A	1.37 ha
Total			9.37ha

2.2 Environmental context

Understanding the landscape context of the Project Site may assist us to better understand the archaeological modelling of the area and assist in identifying local resources which may have been used by Aboriginal people in the past. This information can then potentially be used to predict the nature of Aboriginal occupation across the landscapes within the Project Site.

Factors that are typically used to inform the archaeological potential of landscapes include the presence or absence of resources that would have been used by Aboriginal people including; water, animal and plant foods, stone and other resources. The landscape context assessment for the Project Site is based on several classifications that have been made at national, regional and local levels to help us better understand the archaeological modelling of the Project Site. These site location factors are based on the geology, topography, hydrology, flora and fauna and past land disturbances within and adjacent to the Project Site.

2.2.1 Geology

The landscape context of the Project Site is based on several classifications that include Mitchell soil landscapes, National Interim Biogeographic Regionalisation for Australia (IBRA) data and NSW geological maps. The combination of these differing resolutions of landform data provides a comprehensive and multi scaled understanding of the landscape within the Project Site and its immediate surroundings.

The Project Site is located within the Murray Fans subregion of the Riverina Bioregion. The geology of the subregion (see Table 2-2) is comprised of quaternary alluvial sediments with clay and sand with source bordering dunes, lakes and swamps. The Project Site is mapped as being entirely within the Cenozoic Shepparton Formation – comprising poorly consolidated clay, silt, sand and gravel by the NSW 1500K Simplified Surface Geology. The Jerilderie 1:25k Geological Map places the Project Site within quaternary unconsolidated riverine deposits of clay, silt, sand and gravel (Tuckwell 1975).

The Project Site is primarily within the Murray Scalded Plains Mitchell Landscape comprising quaternary alluvial plains with extensive scalding interpreted as relic floodplains and terraces. Soils are red brown texture-contrast soils with deep coarse sands in former stream channels with sandy levees and grey, brown and red cracking clays in depressions with relief ranging from 5 to 25 m (DECC 2002). The southern edge of the Project Site is within the Murray Depression Plains Mitchell Landscape. The Mitchell Landscape relevant for the Project Site are noted in Table 2-3 and shown Figure 2-1.

Archaeologically, the geology of any location is important as it informs as to whether there any potential for in-situ deposits of stone material traditionally used for the manufacture of stone tools or whether these materials would have to have been sourced from further afield or even traded with other groups of people. Based on the underlying geology of the Project Site there is unlikely to be deposits of material suitable for stone artefact manufacture in the local vicinity. It is likely that the lack of suitable raw materials available locally would mean any artefacts that are present were likely manufactured from material that was brought in from elsewhere.

Table 2-2 Description of the Murray Fans Subregion (NPWS 2003).

Subregion	Geology	Landforms	Soils	Vegetation
Murray Fans	Quaternary alluvial sediments. Clay and sand with source bordering dunes, lakes and swamps.	Relatively confined alluvial fan constrained by sediments from northern Victorian rivers, the Murrumbidgee fan and the Cadell fault. Meandering channels, floodplains, source-bordering dunes, overflow lakes and swamps.	Red brown earths, grey clays and deep sands.	Extensive river red gum forests with river cooba on channels and low floodplains. Yellow Box and black box with saltbush on high floodplains and terraces. White cypress pines on dunes, sandy levees and lunettes. Common reed, cumbungi and grasses in swamps.

Table 2-3 Description of the Mitchell Landscapes within the Project Site (DECC 2002).

Landscape Name	Description
Murray Scalded Plains	Quaternary alluvial plains with extensive scalding interpreted as relic floodplains, terraces or part of the Cadell tilt block. Red brown texture-contrast soils with extensive scalds. Prior stream channels of deep coarse sands with sandy levees and grey, brown and red cracking clays in depressions, relief 5 to 15 m. Mostly cleared, cropped and grazed. Formerly open woodland and grasslands of white cypress pine (<i>Callitris glaucophylla</i>), grey box (<i>Eucalyptus microcarpa</i>), bull oak (<i>Allocasuarina luehmannii</i>), and myall (<i>Acacia pendula</i>) with annual grasses and herbs.
Murray Depression Plains	Quaternary alluvial plains with numerous circular depressions interpreted as high floodplains or low terraces beyond the reach of average floodwaters. Grey and brown cracking and noncracking clays often with gilgai on the plains, sandy rises and levees trace ancestral streams and stand above the general plain, relief 1 to 3 m. Sands and red or brown texture-contrast soils on the higher ground.

2.2.2 Topography

It is important to consider the topography of the Project Site as well as the wider region to understand how it facilitated the movement of Aboriginal people through the area and which areas were more likely to have been frequented. The Project Site is located within the Murray Riverine plains in the Murray Irrigation area. The Project Site has been heavily irrigated for agriculture for at least the last 100 years and laser levelling is known in the area. Therefore, the Project Site is on a flat plain (Figure 2-2).

The topography of the Project Site comprises of a single flat plain landform with no landforms features that are considered to be archeologically sensitive.

2.2.3 Soils

No soil landscape mapping has been completed over the Project Site; however, Mitchell landscape descriptions identify the area as comprising red brown texture-contrast soils with deep coarse sands in former stream channels with sandy levees and grey, brown and red cracking clays in depressions (DECC 2002). The IBRA Murray Fans subregion generalises soils as red brown earths, grey clays and deep sands (Morgan and Terrey 1992).

A number of soil profiles which are available on eSPADE have been undertaken in the area surrounding the Project Site. While none are within or adjacent to the Project Site, they provide an understanding of the soils likely to be expected within the Project Site. The soil profiles on eSPADE in the local area suggest that the soil profiles in the area generally consist of a shallow topsoil (0 to 15 cm) of a dark yellowish brown fine sandy clay loam over a dark brown to reddish brown medium clay.

A number of soils profiles in the closest proximity to the Project Site (Figure 2-1) are noted to have no topsoil, going straight onto a dark brown to reddish brown medium clay. Based on the nearby soil profiles there is expected to be minimal topsoil in the Project Site over clay with minimal potential for subsurface deposits. These assumptions of the soils were confirmed by the geotechnical bore holes undertaken within the Project Site. The geotechnical investigation onsite showed that soils were a grey to red brown clay with limited, if any, topsoil.

2.2.4 Hydrology

No natural waterways or waterbodies are located within the Project Site which is located on a plain landform (Figure 2-2).

The Project Site is within the Murray Irrigation Area and the Mulwala Canal (which was built in the 1930s to facilitate irrigation in the region) is located approximately 1 km north of the Project Site. The Mulwala Canal forms part of the Murray Irrigation Area which was created to control and divert the flow of local river and creek systems for the purpose of food production in the region. It is not known if the Mulwala Canal followed a once natural water course or drainage line however it can be noted that the hydrology surrounding the areas in which it was constructed have been significantly altered.

There are also numerous other irrigation channels near the Project Site, and it is not possible to determine where the natural waterways prior to intensive modification for irrigation channels occurred in the landscape, although it is probable that some of the irrigation channels follow the path of previous natural waterways.

The Mulwala No 19 channel is approximately 400 m north of the Project Site and the Ulupna no 24 channel is approximately 600 m east of the Project Site. The Murray River is located approximately 19 km south of the Project Site while Tuppal Creek (a first order waterway) is located approximately 11 km south of the Project Site.

Previous archaeological and ethnographic studies show the importance of these water resources which would have provided valuable food and plant resources to Aboriginal communities. The water source would have also attracted native fauna which are likely to have been hunted for their resources. As no waterways are located within the Project Site – and because the higher order waterways are at least 19 km away – it is highly unlikely that certain Aboriginal sites (i.e., midden, hearths) will be identified within the Project Site, as the focus of subsistence activities is more likely to have taken place within proximity to more permanent water sources.

2.2.5 Flora and fauna

The information provided herein is intended as a generalised summary of the endemic flora and fauna present within the Project Site and is not to be used as a substitute for detailed ecological studies and assessments.

The Murray Scalded Plains Mitchell Landscape is described as mostly cleared, cropped and grazed. Formerly open woodland and grasslands of white cypress pine (*Callitris glaucophylla*), grey box (*Eucalyptus microcarpa*), bull oak (*Allocasuarina luehmannii*), and myall (*Acacia pendula*) with annual grasses and herbs (DECC 2002, p. 103). The Murray Fans subregion is recorded as containing extensive river red gum forests with river cooba on channels and low floodplains. Yellow Box and black box with saltbush on high floodplains and terraces. White cypress pines on dunes, sandy levees and lunettes. Common reed, cumbungi and grasses in swamps (Morgan and Terrey 1992).

The Project Site has been extensively cleared of vegetation and cropped with the BESS site divided into paddocks, which are dominated with low quality native grasses and forbs (*Rytidosperma* and *Vittadinia* dominated). The access point and roadside vegetation is dominated by exotic vegetation interspersed with some scattered native grasses and forbs. The groundcover within the Finley Substation Lot is highly degraded, low condition grassland comprised predominantly of exotic vegetation, interspersed with scattered native flora.

There is very little potential for old growth native trees to be located within and/or adjacent to the Project Site that have the potential to contain evidence of Aboriginal cultural modification.

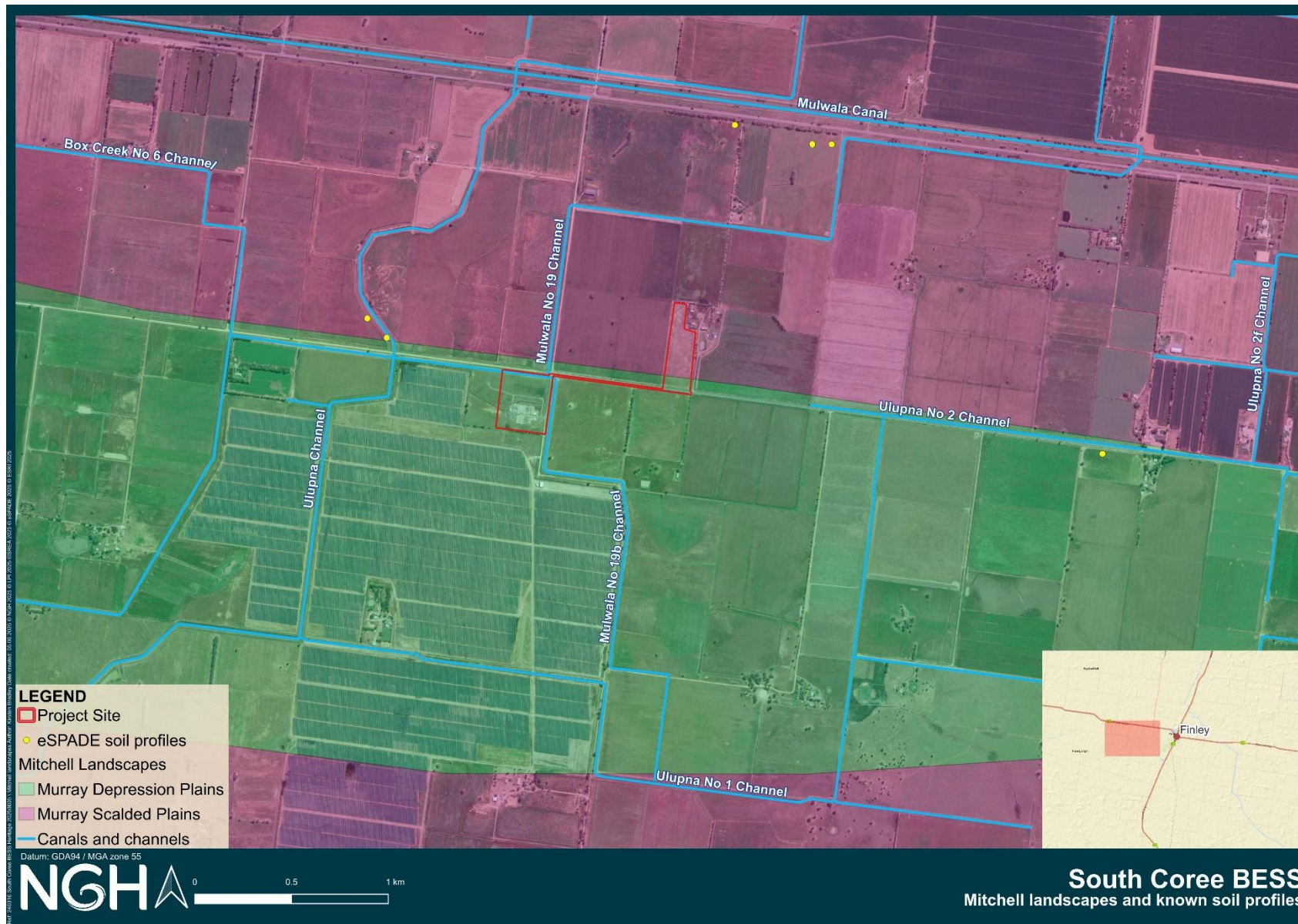


Figure 2-1 Mitchell landscapes and eSPADE soil profiles near Project Site

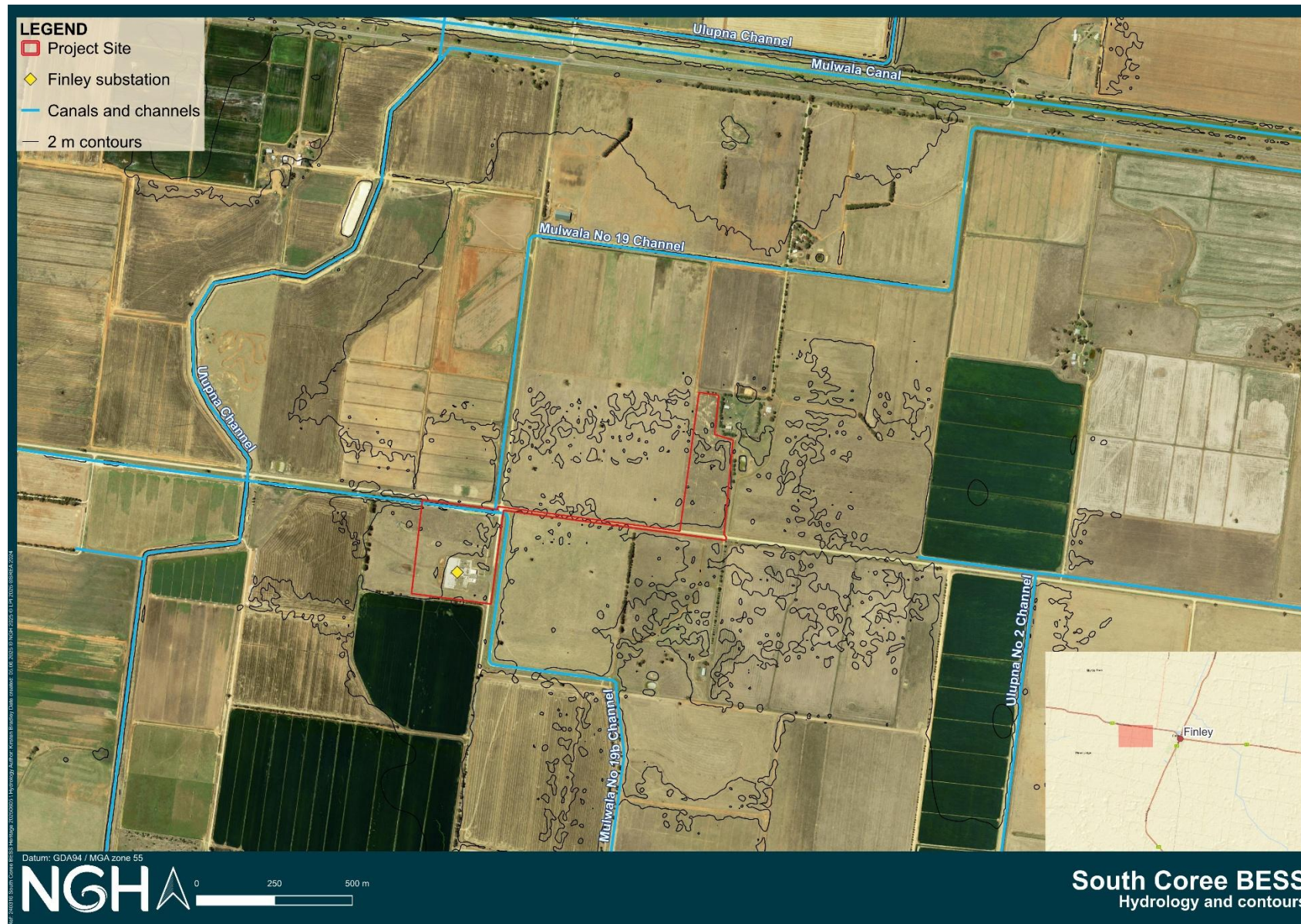


Figure 2-2 Hydrology and contours

2.2.6 Historic land use and land disturbance

European squatters from the Port Phillip district moved into the southern a western Riverina in the early 1840s and the township of Finley grew on land leased to Benjamin Boyd for Tuppal station. The first building in what is now Finley was a shepherd's hut known as Murray Hut located at a midpoint between Jerilderie and Tocomwal at the junction to two stock routes adjacent to a swamp (Finley Lake). Finley is named after Surveyor F.G Finley who surveyed 1.2 million hectares of the Riverina District in the 1870s (SMH 2008). Wheat was the primary cultivar in the area although water shortages and droughts were a problem before the construction of the Berriquin Irrigation District (which forms part of the Murray Irrigation Area) and Mulwala Canal.

The lands within the Project Site are currently used for roads, agriculture, and utilities (electricity substation and transmission). The Mulwala Canal to the north of the Project Site was built in the 1930s which draws water from the Murray River at Lake Mulwala and stretches 156 km west through Berrigan, Finley and Deniliquin. The last channels associated with the irrigation network were completed in 1964 (Murray Irrigation, nd). The BESS area within the Project Site has been irrigated and used for cropping for at least the last 100 years. The earliest historic air photos covering the BESS site from 1968 (see Plate 2-1) show the area is cleared of trees with an irrigation channel running along the northern and eastern boundaries. A historic aerial from 1995 (see Plate 2-2) shows irrigation running east to west across the BESS site and the Finley substation being present.

	
Plate 2-1 1968 aerial photograph. The red rectangle shows approximate location of the BESS site while the yellow circle shows the substation.	Plate 2-2 1995 aerial photograph. The red rectangle shows approximate location of the BESS while the yellow circle shows the substation.

Broockmanns Road and Canalla Roads both appear on early Parish maps and do not appear to have changed alignment since the late 19th century. Canalla Road was upgraded as part of the Finley Solar Farm development to the south and west of the Finely substation. The Finley substation is visible on historic aerial imagery from 1991 and was constructed prior to this time though the exact date of construction has been unable to be determined during this assessment.

Overall, there is a history of intensive irrigation and agricultural land use within the Project Site. This land use has resulted in the large-scale clearance of vegetation within the Project Site, removing the potential for modified trees. The prolonged use of the area, known laser levelling in the region and use of the land for agriculture is likely to have caused ground disturbance. This has a dual effect in that it may impact the integrity of shallow areas or the upper layers of soil deposits as well as remove subsurface *in situ* artefacts, bringing them into a disturbed surface context. Where more intensive development has taken place, these areas are expected to be in a very disturbed context and therefore hold very little scientific value. However, it should be noted that stone artefacts are known to survive these kinds of disturbances both from superficial cropping/pastoralism and from more intensive developments. Furthermore, deposits of subsurface cultural

material can still be present in areas where superficial disturbances have taken place, albeit in various stage of disturbance, in areas where there is sufficient subsurface deposits.

2.2.7 Landscape context

Most archaeological surveys are conducted in a situation where topographic variation can lead to differences in the assessment of archaeological potential and site modelling for the location of Aboriginal objects. However, as already noted the Project Site has been extensively modified, levelled and cleared of vegetation with no differences in the soil types and no micro features such as sand ridges or palaeochannels present. The Project Site is situated within the Riverine plains in a large open flat area which is cleared of native mature vegetation.

There are no natural water courses or drainage lines across the Project Site, with the nearest permanent water source being Tuppal Creek, located about 11 km to the south. While it is possible that the major irrigation channels and drainage easements adjacent to the Project Site were once natural creeks or drainage lines that have since been modified into irrigation channels, this is unable to be established given the extensive modification of the hydrology of the area.

It is unlikely that the Project Site would have been a focus for Aboriginal occupation in the past based on review of its environmental context, however, prior to European land modifications the area may have provided resources, shelter, water and food for Aboriginal people moving through the area towards water sources such as Tuppal Creek and the Murray River.

2.3 Cultural context

2.3.1 Ethnographic setting

There are several ethnographic recordings of Aboriginal life in the Riverina region from the 1800s that notably focus on the prevalence of Aboriginal people around waterways in the region. It is important to consider that the Aboriginal people alive at the time of such observations were survivors of serious epidemics of infectious disease such as smallpox, brought by Europeans, that greatly affected the population sizes and distribution of people within the landscape. Consequently, European records may not necessarily reflect pre-contact population distributions and traditional ways of life (Dowling 1997; Littleton & Allen 2007).

The dispossession from traditional lands and acts of violence against the Aboriginal people caused great social upheaval meaning that access to traditional resource gathering and hunting areas, religious life, marriage links and sacred ceremonial sites was disrupted or prevented. Despite this, Aboriginal people continued to maintain their connections to sites and the landscape in a variety of ways. The Aboriginal people of the region continue to have a strong connection to their land.

Tribal boundaries and social structure

Cultural areas are difficult to define and “must encompass an area in which the inhabitants have cultural ties, that is, closely related ways of life as reflected in shared meanings, social practices and interactions” (Egloff, Peterson & Wesson 2005, p. 8). Depending on the culture defining criteria chosen - i.e., which cultural traits and the temporal context (historical or contemporary) - the definition of the spatial boundary may vary. In Australia, Aboriginal “marriage networks, ceremonial interaction and language have been central to the constitution of regional cultural groupings” with the distribution of language speakers being the main determinant of groupings larger than a foraging band (Egloff, Peterson & Wesson 2005, pp. 8 & 16).

Early mapping of tribal boundaries by Tindale (1940) identified the Project Site as within the Jotijota (Yorta Yorta) tribe boundary close to the border with Pangerang (Bangerang) tribe boundary (see Plate 2-3). However subsequent mapping by Tindale (1974) identified the Project Site as located within the Jeithi tribal language group (Plate 2-4). The Project Site is mapped as within the Yorta Yorta language boundary (with

variations of the spelling including Yola Tola, Jotijota, Jodajoda, Joti-jota, Yodayod, Yoda-Yoda, Yoorta, Yota, Yota Yota, Yoti Yoti, Yotta-Yotta and Youta) by Horton (1994). Previous mapping and information on the Bangerang people provided to also NGH indicates that Bangerang country extends over the current assessment area (NGH 2017a, 2017b, Plate 2-5).

The borders were not static, but most likely fluid, expanding and contracting over time to the movements of smaller family or clan groups. Boundaries ebbed and flowed through contact with neighbours, the seasons, and periods of drought and abundance. The Murray River was a reliable and abundant resource that sustained some the densest populations of Aboriginal people in Australia with the area from Echuca to the Murray Darling junction occupied by a number of Aboriginal clans with relatively small territories that included a portion of the Murray River and country that spans across the river (Edmonds 1997, p.11). The close proximity to each other also meant that people likely spoke multiple languages and dialects.

It was the small family group that was at the core of Aboriginal society. The immediate family camped, sourced food, made shelter and performed daily rituals together. The archaeological manifestations of these activities are likely to be small campsites, characterised by small artefact scatters and hearths across the landscape. Places that were visited more frequently would develop into larger site complexes with higher numbers of artefacts and possibly have more diverse archaeological evidence.

These small family units were part of a larger band which comprised a number of families. They moved within an area defined by their particular religious sites. Such groups might come together on special occasions such as pre-ordained times for ceremonies, rituals or simply if their paths happened to cross. They may also have joined together at particular times of the year and at certain places where resources were known to be abundant. The archaeological legacy of these gatherings would be larger sites rather than small family camps. They may include large hearth or oven complexes, contain a number of grinding implements and a larger range of stone tools and raw materials. Identification and differentiation of such sites are difficult in the field. A family group and their antecedents and descendants occupying a particular campsite repeatedly over a long period of time may leave a similar pattern of archaeological signatures as a large group camped over a shorter period of time.

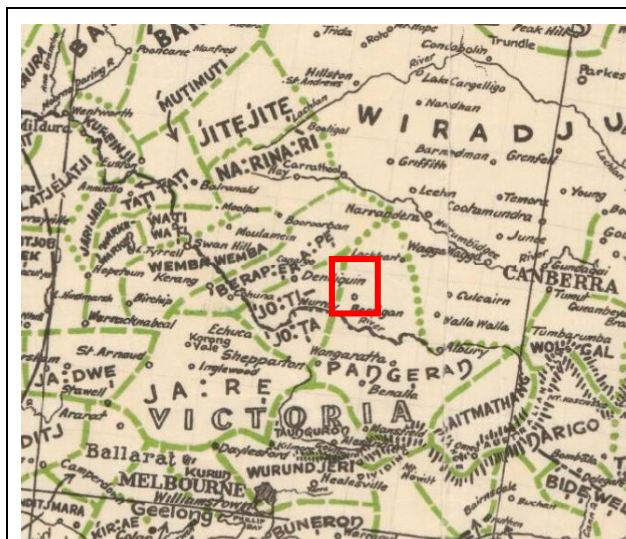


Plate 2-3 Tindale 1940 map extract. Red box shows approximate region of Project Site.

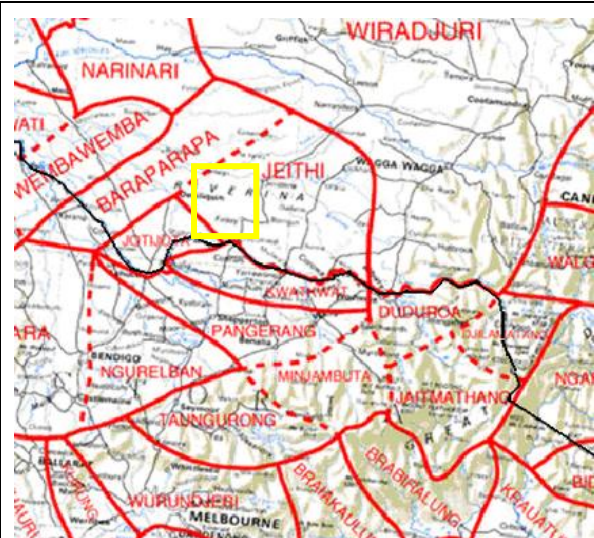


Plate 2-4 Tindale 1974 map extract. Yellow box shows approximate region of Project Site.

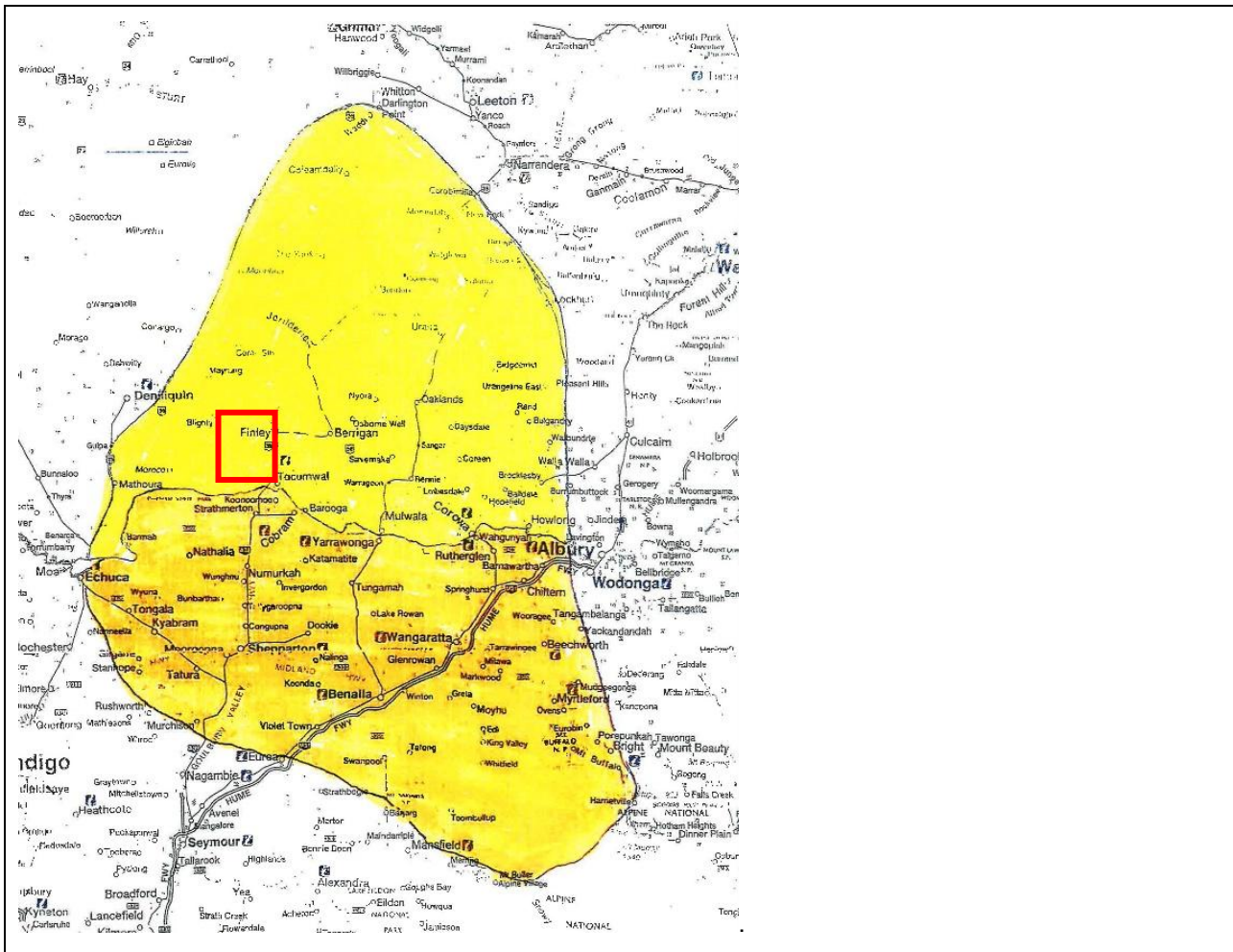


Plate 2-5 Previously provided map of Bangerang country. Red box shows area around Project Site

Material culture, food and resources

Historic accounts of Aboriginal people in the Riverine Plains of south eastern Australian reflect a group of people reliant on a range of both aquatic and terrestrial food resources. During certain seasons fish, shellfish and waterfowl provided a significant part of the flesh diet and corresponds to periods where relatively small areas of land could support large groups of people. In other seasons populations living along the rivers was greatly reduced and the focus on and acquisition of aquatic resources changed. It is during these periods that terrestrial resources became more important and food gathering activities diversified.

During the annual flooding of the rivers, swamps and river flats were inundated and billabongs filled. Under these conditions the netting and trapping of fish by large groups of people became prevalent. The base of a large fibre net would be weighted down with clay heat retainers and at the top of the net reed bundles would be attached as floats. One man would hold one end of the net on the shore while the other would wade into the lagoon gradually dropping the net, once he reached the shore, forming a semi-circle. The two people would start pulling the net back, moving towards one another, hauling the catch of fish towards them. Such activities were recorded to have produced very large volumes of fish (Sturt 1833, Beveridge 1883, Beveridge 1889). Within major billabongs log traps were also constructed to trap fish within a smaller area, for easier access and often associated with large gatherings of people (Gilmore 1934). Additionally, women were recorded catching crawfish, where two women would trawl a fine gauged net along the lagoon bottom.

The trapping of ducks and other waterfowl in lagoons using large nets has also been observed and Beveridge suggests that over a season hundreds of birds are caught in this manner (Beveridge 1883; Beveridge 1889; Ramson 1983). Additionally, huge numbers of waterbird eggs during breeding season are collected using canoes (Beveridge 1883).

Beveridge (1883) observed canoes being manufactured from the a single sheet of Red Gum bark that was propped and moulded into the desired shape and left to season in the sun for ten to fifteen days (Beveridge 1883). He details pronged fish spears that doubled as a means to pole and paddle the canoes, used to harpoon fish in areas of reedy shallow water (Beveridge 1883; Kabaila 1999). Lawrence (1967) suggests that these spears were probably only used when the reed beds were filled with water and consequently not as important during the remainder of the year.

Terrestrial animals such as the possum was noted by many early observers as a prime food source and the skins were made into fine cloaks that evidently were very warm (Evans 1815, Oxley 1820, Mitchell 1839). Kangaroos were also eaten and their skins made into cloaks as well. A range of reptiles, other mammals and insects were also a common food type, in particular grubs and ants and ant eggs (Fraser 1892, Pearson 1981, Beveridge 1889).

Plant foods were equally as important and mostly consisted of roots and tubers, such as *Typha* or Cumbungi whose tubers were eaten in late summer and the shoots in early spring (Gott 1982). The seeds of the nardoo plant, that grow on the floodplain has also been mentioned as an important plant food in the Riverina area with the seeds ground and water added to form a paste or dough that was then cooked (Morey 1921 as cited by Edmonds 1997).

Early records of the Edward River district and the local Aboriginal people area are document in the diary of Reverend Mereweather (Mereweather 1859). He noted that following the late rain in June mushrooms had sprung up on the plains however the local Aboriginal people preferred a “poisonous looking, disgusting yellow fungus” and that bird eggs were consumed when ‘the chicks were near ready to be hatched’. Kangaroo, emu, birds, possums and fish were noted as typical foods, generally caught by spears or boomerangs. He also noted that the men and women were entirely naked in summer and in the winter, they wore possum and/or kangaroo skins (Mereweather 1859).

Mounds were first observed by Mitchell in in 1836 in the Murray River system. He noted how the mounds were used to cook *Typha* in the area of the lower Lachlan and Murrumbidgee Rivers. Beveridge also observed and recorded his observations of mound use in the Murray River area below Swan Hill from the 1850s. Their observations were similar in that the preparation of food was undertaken in much the same way. Beveridge noted that the continued use of these ovens resulted in the build-up of debris and the formation of the mounds, with new clay being introduced each use due to crumbling of the clay heat retainers (as cited in Martin 2006, 2010). Mitchell (1839) also observed the way Aboriginal people of the Murrumbidgee and Murray buried the dead noting that a small thatched hut was erected over a burial. The huts were enclosed by two or three low ridges of dirt in the shape of an ellipse with pointed ends (Mitchell 1839).

Perhaps the most vivid recounting of the landscape and the cultural features within the region comes from Beveridge, who in lived near Swan Hill and described Aboriginal life of the Lower Murrumbidgee, Lachlan, Darling and Murray Rivers in the period 1845 to 1868. His description portrays the annual flooding of the region not as one of hardship but of bounty and plenty.

“All over the submerged country, cooking mounds stand up out of the flood, perfect little islands, looking bright and green, and refreshing to the eye, by reason of the great growth of succulent saltbush, dillines [prickly bushes about a metre tall with edible red and yellow berries], and giant mallow with which they are prettily dressed. These oven islands the natives utilise in the flood season for their village sites, conveying their firewood and other requirements over miles of water from the main land in their canoes. A village, or native encampment, will often times remain on one of these tiny islands for a whole month, feasting upon the oleaginous codfish and his congeners, taking ample toll from the great Murray lobster ... Aquatic birds, too, of many species, together with their eggs, have to contribute pretty heavily to the aboriginal cuisine, and by way of salad they have the watery ionty, and the bitter sow thistle... (Beveridge 1889).

The early observations also note that some weapons and tools were carried, some made from wood such as spears, spear throwers, clubs, shields, boomerangs, digging sticks, bark vessels and canoes (Bennet 1834; Beveridge 1889; Oxley 1820; White 1986). Digging sticks were used by women to collect vegetable foods and ‘grub shovels’ or small wooden spades were described by Eyre (1845) as being used to dig up grubs, ants and Mallee roots. Skin bags and bark troughs were used to carry water and baskets were made from grasses, rushes and netting (Beveridge 1889; Lawrence 1967). Beverage (1883) describes a wooden trough placed over coals for cooking and ‘flints, mussel shells, kangaroo bones and split reeds were used in cutting and skinning foods’ (Lawrence 1967). Other materials were observed in use such as stone axes, shell and stone scrapers and bone needles.

In an archaeological context, few of these items would survive, particularly in an open site context. Anything made from bark and timber and animal skins would decay quickly in an open environment. However, other items, in particular those made of stone would survive where they were made, placed or dropped. Shell material may also survive in an archaeological context. Sources of raw materials, such as the extraction of wood or bark would leave scars on the trees that are archaeologically visible, although few trees of sufficient age survive in the modern context. Outcropping stone sources also provide clues to their utilisation through flaking, although pebble beds may also provide sources of stone which leave no archaeological trace.

2.3.2 AHIMS search

The Aboriginal Heritage Information Management System (AHIMS) provides a database of previously recorded Aboriginal heritage sites in NSW although it is not conclusive evidence of the presence or absence of Aboriginal heritage sites. On 30 August 2024, a search of the AHIMS database was undertaken over an area from Lat. Long -35.7362, 145.2181 to -35.4571, 145.7125 centred over the Project Site. The AHIMS Client Service ID was 922938. An updated extensive AHIMS search over the same search area was undertaken on 30 October 2025 (Client Service ID: 1060415).

There were 68 Aboriginal sites, and no declared Aboriginal Places recorded within the search area. There are no AHIMS recorded sites within or in close proximity to the Project Site. The nearest recorded site, a modified tree is approximately 7 km northeast of the Project Site. The results of the AHIMS search are summarised in Table 2-4 and shown in Figure 2-3. Modified trees were the most common site type in the search area, followed by artefact sites (isolated finds and artefact scatters) and earth mounds. The AHIMS Registrar was contacted by NGH given the identification of restricted sites in the search area. An AHIMS representative confirmed via email that the restricted sites would not be impacted by the proposed development.

Table 2-4 Breakdown of previously recorded Aboriginal sites in the search area.

Site type	Number	%
Modified Tree	46	67.6
Artefact (1 or more)	8	11.8
Earth Mound	8	11.8
Restricted	2	2.9
Earth Mound, Aboriginal Resource and Gathering (ARG)	2	2.9
Hearth	1	1.5
Modified Tree, Aboriginal Resource and Gathering	1	1.5
Total	68	100



Figure 2-3 AHIMS sites within the search area.

2.3.3 Additional searches

Other heritage register searches were also undertaken to identify any Aboriginal heritage items or places in proximity to the Project Site. The following resources were used as part of this assessment:

- The NSW State Heritage Inventory (SHI), this includes items on the State Heritage Register and items listed by state agencies and local government, to identify any items currently listed within or adjacent to the proposal site.
- The Australian Heritage Database, this includes items on the National and Commonwealth Heritage Lists, to identify any items that are currently listed within or adjacent to the proposal site.

The results of the NSW SHI database search indicated there are no items listed for Aboriginal values within or adjacent to the Project Site. The results of the Australian Heritage Database search indicated that there are no items listed within the Project Site.

No other known previously recorded heritage sites are located within or adjacent to the Project Site.

2.3.4 Regional archaeological record

Aboriginal people have occupied what we now know as the Australian continent for at least 40,000 years and perhaps 60,000 years and beyond. There have been no dated excavations in the Finley area, although the archaeological evidence from Lake Mungo, provides ample evidence of Aboriginal occupation dating back 40,000 years (Bowler et al. 2003; Mulvaney & Kamminga 1999; Hiscock 2007). No regional synthesis of the archaeology has been completed for the Finley area and there have been few archaeological surveys conducted in the area. However, there have been several archaeological surveys conducted in the broader Murray Valley and Murrumbidgee Province. During the 1970's and 80's archaeological research in the Murray Valley region between the Edward and Murray Rivers tended to focus on the river corridors and the recording of burials and mounds (Berry and Frankel 1984, Bonhomme 1997, Buchan 1974, Simmons 1980). The following is a summary of the findings from these studies and others to provide regional archaeological context to establish an understanding of the type, extent, and possible distribution of sites which may be located within the Project Site.

A regional overview Aboriginal heritage study for the NSW side of the Murray River Valley was undertaken in 1973-1974 by Buchan (Buchan 1974). Buchan's study area included a 30 mile (approximately 48 km) strip along the north bank of the Murray River from Albury to Mildura. Buchan undertook targeted surveys centred on Corowa, Deniliquin, Hay and Mildura with a total of 198 sites recorded. Site recordings and the targeted survey locations visually inspected were influenced by local knowledge and reporting of potential sites. Oven mounds were the dominant site type (n=94) recorded across the Murray Valley, especially clustered together in areas associated with water sources (Buchan 1973: 38). Most were large mounds with baked clay, shell, bone, charcoal and stone artefact inclusions. Some examples also included complete burials. Other site types recorded included: scarred trees (n=75), open campsites (n=12), midden sites (n=8), burials (n=6), ceremonial sites (n=2), and one site described as having potential archaeological deposit (PAD). This was a stratified deposit located on top of a dune. It was noted during the study that most of the sites recorded had been subject to disturbance since European settlement of the area with stock and introduced species (i.e. rabbits) causing impacts to the sites (Buchan 1974: 38). Burials were mostly identified in sand dunes, creek banks or claypans. Four sites were located in prior stream channels and the archaeological deposit was capping a dune. No site was found further than 1.6 km from a water source.

Simmons (1980) undertook an extensive archaeological survey of the floodplains between the Murray and Wakool Rivers and identified 75 mounds, 17 scarred trees and a range of other site types including isolated artefacts, hearths, shell middens and burials within the Murray floodplain and along channels. Mounds were the most common site type and generally consisted of abundant clay nodules in association with burnt fragments of shell or bone while the scarred trees were generally all mature River Red Gums. The sites

identified by Simmons were all located in close proximity and/or associated with the floodplains, anabranches and lake systems of the Murray Valley and clearly showed the importance of aquatic resources to the local Aboriginal populations in the region.

Berryman and Frankel (1984) completed investigations into Aboriginal mounds on the Wakool River approximately 120 km west of the Project Site. The study included identification and documentation of the mounds and a two-week excavation season. A total of 95 mounds and 11 scarred trees were identified across the study area in varying states of preservation. Disturbance from rabbits, landscaping for water control, roadworks and stock tracks had resulted in significant impact to many of the mounds. Analysis of the data collected showed a direct correlation between the diameter of the mound and the size of the associated water body. Three mound sites were selected for excavation including a riverside mound, ephemeral creek mound and a remote mound situated away from a defined watercourse. The mounds ranged in size from 8-48 m in diameter. Four radiocarbon dates were obtained from the three mounds ranging from 4,160 $\pm$ 300 Before Present (BP) and 2,250 $\pm$ 105 BP. It is suggested that the earliest date may be an anomaly as the additional sample dated this mound to 2,490 $\pm$ 60 BP.

In 1990, Bonhomme completed an archaeological survey of the Barham Forest, approximately 130 km east of the current Project Site. The area comprises 24,800 ha of red gum forest and 700 ha of box forest including grey box, yellow box and black box. The remaining land is comprised of swamps, lakes and open grassland. The survey recorded a total of 182 new Aboriginal heritage sites; 86 mounds (76 intact, one with a burial, 10 destroyed), five middens, one burial, 88 scarred trees and two artefact scatters). For this survey, mounds included ovens, habitations, cultural deposits and middens. Most of these sites were located on the floodplain in association with wetlands, sandy rises or levees. Areas of archaeological sensitivity were identified as elevated land in proximity to ephemeral or permanent water sources with long-term camps expected adjacent to rivers, reed beds and lagoons. The lack of artefact scatters was associated with low ground surface visibility and a lack of useable natural stone resources suitable for flaking available across the floodplain. It was inferred that the reuse of these rare materials would continue until their working capabilities were exhausted and discard of these items would have been minimal. The procurement of wood, shell and bone implements was hypothesised by Bonhomme. As these raw materials are more readily degradable and preservation and location of these items would be rare.

Between 1987 to 1988 Bonhomme (1997) completed an assessment of Aboriginal burial sites across the Riverine Plain, focusing on sand bodies. The study area extended from Condobolin and Albury in the east to Mildura in the west and was bounded by the Lachlan, Murrumbidgee and Murray Rivers. The aim of the study was to collate previous literature on burials across the Riverine Plain and to select a portion of sites to determine common landform characteristics. The results of the study found that burials in sand bodies on the Riverine Plain were very common, but the location of these finds is variable and most readily associated with water sources. The location may also reflect occupation patterns, conscious choice or the close relationship between sand and water sources across the Riverine Plain (Bonhomme 1997:5). The number of sites and the density of burials seemed to increase to the south-west of the Riverine Plain. Lunettes and some source-bordering dunes seemed to contain the greatest density of burials, used over long periods of time. Burial grounds were defined based on the locational patterns identified and appeared to be restricted to the Holocene period, possibly reflecting a change in social organisation during this time (Bonhomme 1997:9). These were found on source-bordering dunes, prior stream levees and pointbar sediments of lake outlet channels.

Sample surveys undertaken by Pardoe and Martin (2001) within the Murrumbidgee Province covered an area of approximately 30,000 square kilometres, extending from Balranald to Narrandera and Booligal to Jerilderie. Using an analysis of landforms and identifying gaps in the archaeological knowledge based on the sites recorded in the AHIMS database, they found that there was a bias in the distribution of sites along major waterways and some landforms such as lunettes but there were also large gaps where no sites had been recorded. Pardoe and Martin surveyed 61 sample areas or quadrants from 22 Stations or locations across their study area. This resulted in 347 new sites being recorded. The major site types were scarred trees

(26.2%), mounds (24.2%), open sites (14.4%), ovens (12.4%), burials (7.8%) and hearths (6.1%). Pardoe and Martin analysed their results to develop a predictive model for site distribution across the Murrumbidgee Province. They found that mounds varied in size, from 4 m-140 m in diameter and height also varied from 2cm to 2 m. Mounds were commonly found along floodplain creeks within River Red Gum and Black Box vegetation communities. They found that as well as being situated along the major rivers, they were also located on the plains to the north and south of the Murrumbidgee, such as around the edge of depressions such as lakes and swamps and on palaeochannel features. Mounds were often characterised as being situated on elevated ground such as lunettes, levees and dunes where silty sandy soil was prevalent.

2.3.5 Local archaeological studies

The archaeological surveys within proximity of the proposed South Coree BESS and are summarised below.

In 1995, Hamm completed an extensive survey for the proposed construction of an optic fibre cable between Finley, Jerilderie, Argoon, Fairley Grange, Coleambally, Darlington Point, Rowan and Gidgell. Only the areas from Finley to Jerilderie and Darlington Point to Coleambally were subject to field survey. The Finley to Jerilderie survey corridor starts approximately 4.5 km east of the Project Site. Areas of archaeological sensitivity were identified for the Jerilderie to Finley route at a small lake depression just south of Jerilderie and to the west of a small sand dune (Hamm 1995: 5). Generally, sites were considered most likely in proximity to water sources (lake, creek or dry swamp), such as Berrigan Creek, or in elevated flat land such as sand dune crests, lunette or hummocky dune. Locations near water sources were predicted to contain artefact scatters or open camp sites and sand dune or lunettes to contain burials. Scarred trees were predicted in areas of road reserves, where old growth native trees remain. Due to the extensive historic disturbance seen in this region from grazing, farming and irrigation for rice production, it was deemed unlikely that surface sites would be identified. The surveys resulted in three scarred trees located between Darlington Point and Coleambally. A further 17 scarred trees were identified along the Newell Highway between Finley and Jerilderie. These trees lined the Travelling Stock Route next to the highway between the Finley Canal and Berrigan Creek (Hamm 1995: 7). No sites were found next to Berrigan Creek as initially predicted in the site model.

In 1996 Edmonds undertook a pedestrian and vehicular survey for a proposed drainage channel through the Pinelea Drainage Basin between Finley and Tocumwal. This channel is approximately 7.5 km south of the Project Site and was proposed to provide water to 30 farms in the region to improve their agricultural productivity. It was expected that mounds, scarred trees and burials would be the sites most likely to occur. Six scarred trees were recorded during survey on Grey Box trees associated with swamps, depressions and floodplains, river red gums associated with creek banks and *Callitris* pine associated with a sandhill. No other site types were recorded.

In 1999 Biosis (Biosis 1999a) conducted a vehicle and pedestrian survey of Willeroo, Wollamai West and Wollamai East storm water escape channels for the Berriquin Irrigation District approximately 20 km north-west of the Project Site. The length of the three proposed channels was approximately 60 km in total. The channel was proposed to assist in removing floodwaters into natural watercourses after heavy rainfall. As the survey area was located on the open plains to the south of Billabong Creek and east of the Edward River it was suggested that the landscape would have provided resources that may have supported small groups of people as they moved away from the major water courses for short period of time, particularly during less flood prone months (Biosis 1999a). It was noted that large artefact scatters and mounds were not predicted to occur in the area given that larger sites are generally associated with permanent water sources. No sites were identified during the survey, and it was noted that the land along the proposed channel routes had been extensively disturbed by agricultural land use and consequently was not considered likely to contain any Aboriginal sites. Additionally, mature trees in the area were noted to have been removed during land clearing in the 19th century. While no Aboriginal sites were identified three survey marker trees were recorded.

Additional survey of the Willeroo, Wollamai West and Wollamai East storm water escape channels for the Berriquin Irrigation District was conducted by Biosis (Biosis 1999b) in 1999 following an alteration to the initial route surveyed. A single artefact scatter site (AHIMS# 54-3-0020) was recorded on a vehicle track. The site consisted of a broken silcrete flake and a quartz core fragment approximately 30m apart. The remains of two potential hearth features were also noted along the track however these appear to not have been recorded as sites.

In 2002, Navin Officer completed an Aboriginal heritage survey for the proposed redevelopment of the Australian Defence Industry Mulwala Facility approximately 53 km southeast of the Project Site. Four Aboriginal heritage sites were identified including three artefact scatters and one scarred tree. A further three isolated finds had previously been recorded in the Mulwala Facility area. A previously recorded scarred tree was re-located and noted to be in very poor preservation and close to collapse. No further sites were recorded, and no information provided on site distribution.

In 2008, OzArk completed an assessment of the proposed route for the Mulwala to Finley 132 KV electricity transmission line, stretching for 68 km and running to the Finley Substation (approx. 750m southwest of proposed BESS site). No new sites of Aboriginal cultural heritage were identified, and it was determined that there was low potential for intact, subsurface archaeological material in the assessment area. This was due to the area comprising predominantly plains with clay soils which experience periodic inundation during flooding events, making them unsuitable for long term occupation. Further to this no permanent water or rock sources were present in the study area, which has undergone extensive disturbance through clearing of native vegetation and agricultural cropping.

In 2017, NGH Environmental completed an assessment for the proposed Currawarra Solar Farm near Deniliquin, approximately 31 km northwest of the current Project Site (NGH 2017a). The solar farm extended over an area of approximately 620 ha and contained similar clearance of native vegetation and laser levelling for irrigation and cultivation as the Finley area. Six additional areas proposed for road intersection upgrades were also surveyed. Despite the variable visibility encountered during the survey, there were two stone artefact sites (Currawarra Solar IF 1 and Currawarra Solar AS 1), two scarred trees (Currawarra Solar ST 1 and Currawarra Solar ST 2) and one possible and one confirmed European survey Marker tree found across the Project Area and the road intersection upgrade areas. Based on the land use history, an appraisal of the landscape, soil, level of disturbance and the results from the field survey it was concluded that there was negligible potential for the presence of intact subsurface deposits with high densities of objects or cultural material within the area.

In 2017, NGH Environmental completed an assessment of the proposed Tarleigh Park Solar Farm located at Blighty, approximately 27 km west of the Project Site. Despite the variable visibility encountered during the survey no Aboriginal stone artefacts were found across the Project Area. However, two Aboriginal modified trees were recorded within an area of remnant vegetation. The sites were recorded as Tarleigh Park Scarred Tree 1 (fallen dead Black Box tree) and Tarleigh Park Scarred Tree 2 (living *in situ* Black Box tree). Based on the land use history, an appraisal of the landscape, soil, level of disturbance and the results from the field survey it was concluded that there was negligible potential for the presence of intact subsurface deposits with high densities of objects or cultural material within the area.

In 2017, Australian Cultural Heritage Management (ACHM) conducted a Due Diligence assessment for the proposed Finley Solar Farm, located approximately 800 m southwest of the Project Site. The report covered both Aboriginal and non-Aboriginal heritage. Ground surface visibility was high along channels and all areas of exposed ground were inspected for the presence of stone artefacts. A high level of disturbance and agricultural modification was noted across the area, including laser-levelling, grading and extensive irrigation drains and channels. No Aboriginal sites were identified. It was concluded that it would be unlikely for unidentified Aboriginal objects to be present in the solar farm area.

In 2017, RPS assessed the Finley Solar Farm for the same area covered in the previous due diligence assessment undertaken by ACHM, which is approximately 800 m southwest of the Project Site. The ACHA study for the Finley Solar Farm was undertaken to meet the conditions of the SEARs relating to Aboriginal

heritage for the project which noted that adequate consultation with the local Aboriginal community must occur. No Aboriginal sites were identified during the subsequent study, which integrated the results of the ACHM assessment.

NGH (2020) undertook a Due Diligence assessment for the proposed Finley 5MW Solar Farm approximately 2.8 km southeast of the Project Site. No Aboriginal sites or areas of archaeological sensitivity were identified across the proposal site. This was noted to be due to the historic disturbance resulting from the installation of channels to the north and southeast of the Project Area and the laser levelling for previous cropping purposes.

2.4 Summary of archaeological context and site location model

The AHIMS database is a record of those places in NSW that have been identified and had site cards submitted. It is not a comprehensive list of all places in NSW as site identification relies on an area being surveyed and on the submission of site forms to AHIMS. There are likely to be many areas within NSW that have yet to be surveyed and therefore have no sites recorded. Therefore, an absence of AHIMS recorded sites within an area does not mean that sites are not present. While a number of in-depth studies have been completed in the wider region, a comprehensive and detailed understanding of Aboriginal land use of the Finley region is still somewhat lacking. It is possible however, to ascertain that proximity to resources, particularly food and water sources was a key factor in the location of Aboriginal sites. It is also reasonable to expect that Aboriginal people ventured away from these resources to utilise the broader landscape. There are likely to be sites that exist that have yet to be identified although the scale of farming and development has altered the natural landscape across most of the region. This activity has also disturbed the archaeological record and there are unlikely to be many places that retain *in situ* archaeological material due to the scale of agricultural and pastoral activities and development.

Based upon the background research for this assessment, it appears that there is low potential for sites of Aboriginal cultural heritage to occur within the Project Site given the lack of archaeologically sensitive landforms within or in close proximity to the Project Site. Previous archaeological studies and Aboriginal site modelling in the region suggest the most archaeologically sensitive areas occur in association with major water sources, including anabranches and ephemeral and relict lake systems and relatively intact portions of Riverine Red Gum forests along the floodplains of major active rivers and creeks and Black Box fringed depressions. Sand bodies are also noted as archaeologically sensitive in relation to the identification of burials. The archaeological sensitivity of source bordering dunes and lunettes to water sources, prior streams and sand bodies, including scalded environments is also noted. None of these archaeologically sensitive landforms are present in or in close proximity to the current Project Site

The previous archaeological assessments in the region strongly suggest that the most likely site types would be culturally modified trees (where old growth trees remain) or artefacts (low density scatters or isolated finds). There is minimal potential for scarred trees to be identified due to previous extensive tree clearance across the Project Site however, any isolated remnant old growth native trees present have the potential to contain evidence of Aboriginal cultural modification. Due to the flat terrain and lack of known proximity to natural sources of water it is considered that the Project Site may have been used in a transitory nature by Aboriginal people passing through the area when utilising the permanent resources of the Murray River and smaller nearby ephemeral creek lines. Low density artefact scatters or isolated finds are possible but considered to be unlikely to occur due to high levels of disturbance within and surrounding the Project Site.

The likely archaeological site types for the local area, and the potential for their presence within the Project Site, is outlined in Table 2-5 below.

Table 2-5 Aboriginal site prediction statements.

Site type	Site description	Potential
Isolated artefacts	A single isolated stone artefact	Isolated finds may occur throughout the Project Site.
Stone artefact scatters	Artefact sites can range from high-density scatter concentrations through to low density sites.	Low potential to occur in low densities within the Project Site.
Modified trees	Trees that have undergone cultural modification.	Low potential to occur within the Project Site due to extensive vegetation clearance. However, there is always potential where remnant mature native trees are present, included as isolated paddock trees.
Potential Archaeological Deposits (PADs)	Potential subsurface deposits of archaeological material.	PADs have potential to occur in areas that are likely to have reasonable subsurface deposits in archeologically sensitivity landforms. PADs are likely to occur on elevated landforms in proximity to water or in sand bodies. No such raised landscape features or sand bodies are known to occur within the Project Site and given consideration to the clay soils and shallow soil deposits of the local areas area PADs are unlikely to occur.
Hearths/Ovens	Are identified by burnt clay used for heat retainers. Some are recorded in the district in association with resource locations. However, they could occur either independently or in association with other Aboriginal cultural features such as artefact scatters. Hearths are generally considered to be limited, one-off use or reused but few times and are smaller concentrations. Ovens are considered to represent larger features, often extending over a larger area and can include other material such as bone.	Similar sites have been recorded within the region however they tend to be adjacent to water sources. While such sites are possible to occur ovens as a site type are considered unlikely to occur. It may also be possible however for heat retainers from hearths to be present. Though the context of such sites is likely to have been disturbed through historical land use and farming practices.

Site type	Site description	Potential
Mounds	Are accumulations of heat retainer ovens that have built up over time. They are typically round or oval in shape and range in length from just a few metres to over 100 m and range in height from 0.1 m to 2 m. They are identified by the presence of baked clay heat retainers, which have usually been brought to the location from a nearby source of natural clay such as a lakebed, swamp or drainage line. Mounds are likely to contain a range of other archaeological features such as bone, shell, stone artefacts and burials.	Mounds are generally found in proximity to wetland areas such as lakes, swamps and creeks, often elevated above these areas by being situated on sandy rises, lunettes, source bordering dunes and paleochannels. No such features are known to occur within the Project Site and mounds are considered unlikely to occur.
Burials	Ancestral Aboriginal burials are generally found in elevated sandy contexts or in association with rivers and major creeks.	Unlikely to occur within the Project Site given the clay soils and distance from a major watercourse.

2.4.1 Limits on information

Regarding the limitations of the information available, archaeologists rely on Aboriginal parties to divulge information about places with cultural or spiritual significance (intangible values) in situations where non-archaeological sites may be threatened by development. To date, no such places have been identified within the archaeological reports carried out within the local Finley area or through the consultation process undertaken with the Aboriginal community for this project. There is always the potential for such places to exist but insofar as the current Project Site, no such places or values have been identified by the Aboriginal community.

3. Aboriginal community consultation

The consultation with Aboriginal stakeholders for this Project was undertaken in accordance with Section 60 of the *National Parks and Wildlife Amendment (Aboriginal Objects and Aboriginal Places) Regulation 2019* and following the process outlined in the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (ACHCRP). The guide outlines a four-stage process of consultation as follows:

- Stage 1 – Notification of project proposal and registration of interest.
- Stage 2 – Presentation of information about the proposed project.
- Stage 3 – Gathering information about cultural significance.
- Stage 4 – Review of draft cultural heritage assessment report.

The full list of consultation steps, including those groups and individuals who were contacted, and a consultation log is provided in Appendix A. A summary of actions carried out in following these stages are as follows.

Stage 1. Letters outlining the development proposal and the need to carry out an ACHA were sent statutory authorities including Heritage NSW, as identified under the ACHCRP on 26 August 2024. An advertisement was placed in the local newspaper, the *Southern Riverina News*, on 28 August 2024 seeking registrations of interest from Aboriginal people and organisations. An additional letter was sent on 25 October 2024 after email response from Berrigan Shire Council on 24 October 2024. In each instance, the closing date for submission was 14 days from receipt of the letter.

As a result of this process, seven Aboriginal groups registered their interest in the Project. These were:

- Bangerang Aboriginal Corporation;
- Cummeragunja LALC;
- Deniliquin LALC;
- Girragirra Murun Aboriginal Corporation;
- Moama LALC;
- Southern West Yiradyuri Clans, Land, Water and Sky Country Aboriginal Corporation; and
- Thomas Dahlstrom.

The consultation log in Appendix A will be redacted in all public versions of this report.

Notification of Registered Aboriginal Parties (RAPs) for this Project was provided to Cummeragunja LALC and Heritage NSW on 21 October 2024 with an additional update sent on 22 November 2024.

Stage 2. On 25 October 2024, an *Assessment Methodology* document for the South Coree BESS ACHA was sent to all seven RAPs listed above by email. This document provided details of the background to the proposal, a summary of previous archaeological surveys, and the proposed heritage assessment methodology for the proposal. The document invited comments regarding the proposed methodology and sought any information regarding known Aboriginal cultural significance values associated with the Project Site and/or any Aboriginal objects contained therein. A minimum of 28 days was allowed for a response to the document.

None of the registered parties raised any objections to the methodology and many expressed an interest in participating in fieldwork.

Stage 3. The *Assessment Methodology* outlined in Stage 2 included a written request to provide any information that may be relevant to the cultural heritage assessment of the Project Site. It was noted that sensitive information would be treated as confidential. No response regarding cultural information was received in response to the methodology.

The survey fieldwork was organised, and two of the seven registered groups were selected for fieldwork participation by the Proponent. The survey fieldwork was carried out on 10 December 2024 by one archaeologist from NGH, one representative from Cummeragunja LALC and one representative from Bangerang Aboriginal Corporation.

Stage 4 A draft version of this ACHA for the proposal (this document) will be forwarded to the RAPs inviting comment on the results, the significance assessment and the recommendations post completion of the testing program. A minimum of 28 days was allowed for responses to the document and all responses will be incorporated into this document.

3.1 Aboriginal community feedback

A copy of the draft ACHA was sent via email to all RAPs for the Project on 06 March 2025 with a reminder email for comments sent to all RAPs on the 27 March 2025.

Comments were received via email on 03 April 2025 from the Southern West Yiradyuri Clans, Land, Water and Sky Country Aboriginal Corporation who noted that they had no comments on the draft ACHA.

No replies or comments on the draft ACHA for the Project were received from the other RAPs and this report was subsequently finalised.

4. Archaeological investigation results

4.1 Fieldwork Aims

The objectives of the fieldwork were to:

- Comply with current NSW legislation and heritage guidelines;
- Undertake a survey to identify any archaeological material or areas of PAD; and;
- To record all Aboriginal cultural heritage objects and places within the Project Site.

4.2 Survey strategy

The survey strategy during the assessment was to cover as much of the ground surface as possible within the Project Site in a systematic way through the visual inspection of area focusing on the proposed development footprint for the BESS and other infrastructure, and areas of with ground surface visibility or exposures to identify Aboriginal heritage objects. The survey aimed to provide enough surface coverage to be confident of assessing the proposed development areas for the presence of Aboriginal objects.

The Project Site was broken into three survey areas: the existing substation, road corridor and BESS area. These three areas were surveyed on foot in transects with spacing of 2 to 30 m between survey participants. The survey team consisted of three people (two representatives from the Aboriginal community and one archaeologist) which allowed for 5 to 60 m wide tracts of the Project Site to be surveyed with each transect. Areas within the proposed development footprint as well as areas with good ground surface visibility and any remnant old growth trees were the focus. The road corridor had the narrowest spacing due to the narrow road reserve corridors and consideration of safety requirements when working near roads.

Ground surface visibility was generally good across the Project Site and was constrained by the grasses and weed ground cover present. Ground surface visibility was best along vehicle tracks and in ground surface exposures present mostly within the BESS site and within the road corridor.

NGH believes that the survey strategy was comprehensive and the most effective way to identify the presence of Aboriginal heritage objects within the Project Site. Discussions were held in the field during and after the survey between the archaeologist and Aboriginal community representatives to ensure all were satisfied and agreed with the spacing and methodology.

The survey fieldwork, as assessed in this report, was undertaken by the team of one archaeologist and two representatives of the RAPs for the Project, over a single day on December 10, 2024. During the survey, notes were made about visibility, photographs were taken, and any possible Aboriginal objects or features identified were inspected, assessed, and recorded if deemed to be Aboriginal in origin.

4.3 Survey coverage

The Project Site for the South Coree BESS primarily consisted of cleared flat land with low grasses and weeds. The survey undertaken for the South Coree BESS covered a larger area than the Project Site which has been refined throughout the EIS assessment process. The three survey units are shown in Figure 4-1 and the effective survey coverage for each unit is presented in Table 4-1.

The first survey area was adjacent to the existing Finley substation. This area had the lowest ground surface visibility within the Project Site due to vegetation coverage. There were limited exposures with some gravels. The average visibility was approximately 60% with the best visibility along vehicle tracks and on irrigation channels. There was existing disturbance in the form of vehicle tracks, substation and electricity transmission infrastructure and dry irrigation channels (see Plate 4-1 and Plate 4-2). The Mulwala Channel No 10 ran along the northern portion of this survey unit.

The second survey area was of the road verges along Canalla Road and Broockmanns Road. Ground surface visibility was generally poor along the road verges along Canalla Road (Plate 4-3) and existing services were noted within the road verge along both roads. Broockmanns Road was in good condition and the survey area appeared to have been relatively recently resurfaced. Ground surface visibility was generally good along the Broockmanns Road verges which averaged 80% visibility (Plate 4-4 to Plate 4-6). The road verges were all disturbed from road construction and other services.

The final survey unit was the proposed BESS site (see Plate 4-7 to Plate 4-10). The ground surface visibility in this area was generally good with low ground cover and large areas of ground surface exposure with visibility averaging 80%. Previous disturbance from construction of irrigation infrastructure was evident in parts of the proposed BESS site, with an irrigation channel along the southern boundary and to the north of the BESS site noted.

Across the Project Site, areas of increased visibility consisted of access roads and tracks, irrigation channels and patches of bare ground. Table 4-1 below shows the calculations of effective survey coverage. The effective visibility across the Project Site ranged from 95% in exposures to less than 5% in areas with a dense grass cover and vegetation. Between the survey participants, over the course of the field survey approximately 4.8 km of transects were walked across the Project Site by the survey team. Allowing for an effective view width of 5 m for each person and given the variability in the ground visibility across the Project Site, overall, the survey effectively examined 23.9% of the Project Site which was assessed during this survey investigation.

It is considered by NGH that the survey of the Project Site during this investigation had sufficient survey coverage.



Plate 4-1 View north across proposed connection to Finley substation.



Plate 4-2 View north across vegetated existing currently dry irrigation channels.



Plate 4-3 View north across road verge along Canalla Road into Finley substation.



Plate 4-4 View west along Brookmanns Road showing area of good ground surface visibility.



Plate 4-5 View west along Brookmanns Road verge showing area of good ground surface visibility and area of gravel adjacent to road tarmac.



Plate 4-6 View east along Brookmanns Road verge showing area of poor ground surface visibility.



Plate 4-7 View south across proposed BESS site.



Plate 4-8 View west of dry irrigation channel in south of proposed BESS site.



Plate 4-9 View north across large exposure in proposed BESS site.



Plate 4-10 View south-east across the proposed BESS site.

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South Coree Battery Energy Storage System



Figure 4-1 Survey units with tracklog from NGH archaeologist.

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South Coree Battery Energy Storage System

Table 4-1 Table of effective survey coverage for the South Coree BESS Project Site

Survey area*	Number of Survey Transects	Exposure type	Survey Unit Area ha	Surveyed area (length m x width m)	Surveyed Area* m ²	Visibility (average %)	Effective coverage (area x visibility) m ²	Survey unit surveyed(ha)	Percentage of survey unit effectively surveyed	Survey result
Substation	6	Tracks, exposures and along irrigation channels	7.3	933 m x 15 m	13, 995	60	8,397	0.84	11.5	No Aboriginal cultural material identified. No PADs identified.
Road corridor	4	Exposures on road verge, irrigation channels	1.5	Complete coverage	15,000	80	12,000	1.2	80	No Aboriginal cultural material identified. No PADs identified.
BESS site	8	Tracks, exposures and irrigation channels	5	1,060 x 15 m	15,900	80	12,720	1.3	26.0	No Aboriginal cultural material identified. No PADs identified.
Total	18	-	13.8	-	44,895	-	33,117	3.3	23.9	No Aboriginal cultural material or PADs identified.

*Please note this is referring to area surveyed within the Project Site only as mapped in this assessment and excludes the additional heritage surveyed areas outside of the Project Site boundary shown in this report.

4.4 Survey results

No new Aboriginal sites were identified during the survey within the Project Site.

No mature trees were present within the Project Site.

Ground surface visibility was generally good and there were exposures, particularly within the proposed BESS site, that indicated a generally very shallow topsoil over clay which has been significantly impacted through past historical disturbance and land use activities. No elevated areas or microtopographic features which may have been a focus for Aboriginal occupation were identified and the area was noted to have negligible potential for soils of any depth.

No areas within the Project Site were identified to have potential for subsurface deposits or archaeological sensitivity. Based on the topography, generally shallow soils and the known archaeology from the local area there is a low potential for subsurface Aboriginal archaeological deposits to occur within the Project Site.

Overall, the Project Site has a low potential for Aboriginal objects to occur, and no Aboriginal objects or PADs were recorded during the site survey.

4.4.1 Consideration of subsurface potential

Based on the land use history, an appraisal of the landscape context, soils, level of disturbance, archaeological modelling and the results from the field survey it was concluded that there was negligible potential for the presence of intact subsurface deposits with high densities of cultural material within the Project Site.

The modified drainage channels in proximity to the Project Site are highly disturbed and mechanically created as part of irrigation associated with the Mulwala Canal in the Murray Irrigation Area. The Project Site has been disturbed through agricultural activities and through the construction and maintenance activities for the substation, road and services. Furthermore, the soils across the Project Site were generally noted during the survey to be shallow with minimal topsoil over clay, particularly in the BESS site. This correlates with soil profiles from the surrounding local area (eSPADE 2025) which noted that a medium clay tends to occur below 15 cm, if topsoil is present at all, in the area. Assessment of the geotechnical bore hole data undertaken for this Project also confirmed the soils as clay with very limited, if any, topsoil.

In further consideration of the exposures present throughout the BESS site, which had patches of very high visibility and no cultural material identified, it was determined by the archaeologist present during the survey that subsurface testing was not warranted as the Project Site has a low potential for subsurface Aboriginal objects to occur as the high level of disturbance associated with previous substation and road construction and maintenance activities and the agricultural activities also means that there is no integrity to the flat plain landform within the Project Site. This in addition to the shallow soil profile and clay content of the deposits have been noted to determine that the Project Site has low archaeological potential.

The outcomes of this consideration of subsurface potential are not wholly unexpected as these results and the landscape encountered during the survey are similar to other assessments for the Finley Solar Farm (ACHM 2017, RPS 2017) and Finley 5MW Solar Farm (NGH 2020) which were both undertaken in close proximity to the Project Site within the Berrigan Shire LGA, which also noted negligible potential for the presence of intact subsurface deposits with high densities of cultural material within these nearby solar farm assessment areas.

4.5 Discussion

The predictions based on the modelling for the Project Site were that modified trees (where old growth trees were present), isolated artefacts and low-density artefact scatters were the most likely site features to occur,

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however this potential was low given the historic disturbance and land use history of the area. The most archaeologically sensitive areas for the region were noted to occur in association with major water courses, including anabranches and ephemeral and relict lake systems and relatively intact portions of Riverine Red Gum forests along the floodplains of major active rivers and creeks and Black Box fringed depressions. Also noted to be archaeologically sensitive were source bordering dunes and lunettes in proximity to water sources, prior streams and sand bodies, including scalded environments. The flat topography and lack of landscape features with archaeological sensitivity within or in close proximity to the Project Site suggested that the area would likely not have been a focus of concentrated past activities and was more likely to use used as a transitory space between the permanent resources of the Murray River approximately 19 km south of the Project Site and other resources associated with ephemeral low order creek lines within the Riverine Plain. Extensive disturbance associated with agriculture and irrigation in the area was also noted to have likely disturbed or destroyed this past evidence of the transitory use of this area, if present.

Other surveys in close proximity to the Project Site were also noted to generally have an absence or very low number of sites recorded. The closest recorded AHIMS site to the Project Site is a modified tree located approximately 7 km northeast. As there were no remnant old growth trees within the Project Site and there is evidence of disturbance through the construction of irrigation channels and a long history of cropping, irrigation and agriculture as shown in the historic aerial photos of the Project Site the lack of sites recorded during the site inspection was not wholly unexpected.

Visibility, particularly within the proposed BESS site was good and the survey confirmed the predictive model that the Project Site had a low potential for Aboriginal heritage and areas of PAD. The low potential and lack of archaeologically sensitive landscape features or PADs identified during the survey confirmed that a subsurface testing program was not warranted for this Project. Extrapolating from the results of this survey, it is unlikely that any in situ Aboriginal objects occur within the Project Site. Nevertheless, consideration must also be given to the potential for unexpected objects to occur which based on the land use history and an appraisal of the results from the field survey have been determined to have negligible potential to occur.

5. Cultural heritage values and statement of significance

5.1 Assessment criteria

The assessment of the significance of Aboriginal archaeological sites is currently undertaken largely with reference to criteria outlined in the ICOMOS (International Council in Monuments and Sites) Burra Charter (Australia ICOMOS 2013). Criteria used for assessment are:

- **Social or Cultural Value:** In the context of an Aboriginal heritage assessment, this value refers to the significance placed on a site or place by the local Aboriginal community –either in a contemporary or traditional setting.
- **Scientific Value:** Scientific value is the term employed to describe the potential of a site or place to answer research questions. In making an assessment of scientific value issues such as representativeness, rarity and integrity are addressed. All archaeological places possess a degree of scientific value in that they contribute to understanding the distribution of evidence of past activities of people in the landscape. For example, flaked stone artefact scatters, larger sites or those with more complex assemblages are more likely to be able to address questions about past economy and technology, giving them greater significance than smaller, less complex sites. Sites with stratified and potentially in situ sub-surface deposits, such as those found within rock shelters or depositional open environments, could address questions about the sequence and timing of past Aboriginal activity, and will be more significant than disturbed or deflated sites. Groups or complexes of sites that can be related to each other spatially or through time are generally of higher value than single sites.
- **Aesthetic Value:** Aesthetic values include those related to sensory perception and are not commonly identified as a principal value contributing to management priorities for Aboriginal archaeological sites, except for art sites.
- **Historic Value:** Historic value refers to a site or places ability to contribute information on an important historic event, phase or person.
- **Other Values:** The Burra Charter makes allowance for the incorporation of other values into an assessment where such values are not covered by those listed above. Such values might include Educational Value.

All sites or places have some degree of value, but of course, some have more than others. In addition, where a site is deemed to be significant, it may be so on different levels or contexts ranging from local to regional to national, or in very rare cases, international. Further, sites may either be assessed individually, or where they occur in association with other sites the value of the complex should be considered.

5.2 Significance assessment

5.2.1 Social or cultural value

While the true cultural and social value of Aboriginal sites can only be determined by local Aboriginal people, as a general concept, all sites hold cultural value to the local Aboriginal community. An opportunity to identify cultural and social value was provided to all the registered Aboriginal stakeholders for this proposal through the draft reporting process. The area was noted during the survey to be away from water courses, and it would only be if the area had happened to have been traversed in the past that there might be any Aboriginal cultural heritage items.

5.2.2 Scientific (archaeological) value

As a result of this investigation no Aboriginal sites – stone artefacts, modified trees or PADs were identified within then Project Site. Due to the lack of archaeological material and PADs identified within the Project Site the archaeological significance is considered to be very low to nil.

Any unexpected finds that are encountered are likely to be located within disturbed contexts and therefore may not provide any further information about Aboriginal occupation of the area other than their existence within the landscape.

5.2.3 Aesthetic value

There are no known aesthetic values associated with the Project Site.

5.2.4 Historic value

There are no known historic values associated with the Project Site.

5.2.5 Other values

There are no other known heritage values associated with the Project Site.

5.2.6 Statement of significance

From a scientific perspective, no surface Aboriginal archaeological material was identified within the Project Site and no areas with subsurface potential were identified. The Project Site has very low to nil-scientific significance. There are no known aesthetic or historic values associated with the Project Site. There are no specific cultural values known with regards to the Project Site.

6. Impact Assessment

6.1 Proposed development activity

As mentioned above in section 1.1 of this report, the proposed works for this development comprises the installation, operation, maintenance and decommissioning/re-powering of a BESS, supported by ancillary infrastructure. The Project would have a capacity of up to 80 MW and a storage capacity of 320 megawatt hours (MWh).

The Project would include but not be limited to the following key built form features:

- BESS including battery enclosures, inverters, transformers, switchgear and control room;
- Onsite substation including transformer switch bays and switchgear housed in portable substation containers;
- Underground and/or overhead 132 kV transmission lines to connect the BESS to the Finley substation;
- Finley substation upgrade works to facilitate connection with the BESS;
- Permanent office, operation and maintenance (O&M) buildings, hardstands and Project signage;
- Site access to the BESS from Broockmanns Road, internal site access tracks and parking;
- Landscaping;
- Stormwater management infrastructure, lighting, fencing and security.

These activities would require the use of heavy machinery and would cause significant ground disturbance. Any Aboriginal objects within the Project Site would therefore be subject to harm.

6.2 Assessment of harm

As described in this report, no new archaeological sites were identified during the field assessment of the Project Site. No previously recorded AHIMS sites are located within or in proximity to the Project Site. As a result, there will not be any harm to any known Aboriginal objects or sites by the development of this project.

The construction activities associated with the development of the BESS will result in significant ground disturbance and any unexpected Aboriginal objects within the Project Site would likely be totally impacted. It is however considered that there is a very low potential for surface or subsurface stone artefacts to be present which would be harmed by the development proposal.

6.3 Impacts to values

The values potentially impacted by the proposed works are any social and cultural values attributed to the Project Site by the Aboriginal community. Consultation with the RAPs for this project to date did not identify social or cultural significance associated with the Project Site beyond noting that the area would have been part of the cultural landscape used by Aboriginal people in the past.

There are no known specific values, scientific, social or cultural, aesthetic or historic within the Project Site that would be impacted by the proposed project.

6.4 Consideration of ESD principles

Consideration of the principles of Ecologically Sustainable Development (ESD) and the use of the precautionary principle was undertaken when assessing the harm to Aboriginal heritage within the Project

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Site. The main consideration was the cumulative effect, in respect to the wider archaeological record, of any proposed impact on any unexpected finds given that no Aboriginal objects or sites were identified within the Project Site.

The precautionary principle in relation to Aboriginal heritage implies that development proposals should be carefully evaluated to identify possible impacts and assess the potential consequences. No Aboriginal heritage sites, objects or areas of PAD were identified during this assessment and the Project Site is considered to have very low to nil archaeological significance. Any unexpected finds that may be encountered are likely to be located within highly disturbed contexts and therefore may not provide any further information about Aboriginal occupation of the area other than their existence within the landscape. However, in the event that unexpected finds are encountered during construction it can be concluded that the overall cumulative impact on the archaeological record for the region is likely to be very low.

The principle of inter-generational equity requires the present generation to ensure that the health and diversity of the archaeological record is maintained or enhanced for the benefit of future generations. We believe that the diversity of the archaeological record is not compromised by the proposed development as there are no sites that will be impacted within the Project Site. Therefore, there are no reasons based on ESD principled that the development should not proceed.

7. Management and mitigation measures

7.1 Consideration of harm

There are no known Aboriginal heritage sites within the Project Site that would be harmed by the proposed development. Based on this assessment and in consideration of discussions with the Aboriginal representatives during the field survey, it is not considered necessary to prevent development at this location.

7.2 Mitigation of harm

Mitigation of harm to cultural heritage sites generally involves some level of detailed recording to preserve the information contained within the site. Mitigation can be in the form of minimising harm, through slight changes in the development plan or through direct management measures of the artefacts. As there are no known Aboriginal heritage sites within the Project Site mitigation or further archaeological assessment is not warranted as long as all works remain within the area assessed.

Site personnel should be advised that despite no Aboriginal sites being recorded during the ACHA the area would have been part of the cultural landscape used by Aboriginal people in the past and ground disturbance is not allowed outside of the approved areas.

7.2.1 Unexpected finds protocol

Aboriginal heritage should however be included within the Environment Management System (EMS) or equivalent plan for the Project. This should include an unexpected find protocol and could include an onsite induction. A basic unexpected find protocol for this project is provided in Appendix B which may be used to form part of the heritage section of the EMS. The unexpected finds protocol must note that if any Aboriginal objects, or potential objects, are uncovered during works, all work in the vicinity should cease immediately and a qualified archaeologist contacted to assess the find.

In the event unexpected Aboriginal objects are identified during works the inspection and relocation of the objects should be undertaken by a qualified archaeologist with a representative of the RAPs, as selected by the Proponent/ Project Owner, and be consistent with Requirement 26 of *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*. The objects may be temporarily held in a locked secure location onsite or with the Project archaeologist until the long-term storage/reburial of the objects can occur. It is not intended that any short-term storage of any unexpected Aboriginal objects would exceed 12 months. The long-term relocation area must be within the Subject Lots in an area that will not be subject to any future ground disturbance. If an alternative location outside the Subject Lots is required due to unforeseeable reasons, additional consultation with the RAPs must occur.

In the unlikely event that human remains are encountered all work must cease in the immediate vicinity and an unexpected finds protocol followed. The local NSW police must be notified. Further assessment would be undertaken to determine if the remains were ancestral Aboriginal or not. In the event that any remains are determined to be ancestral Aboriginal in origin Heritage NSW must be notified.

8. Recommendations

The recommendations are based on the following information and considerations:

- Results of the current archaeological survey of the Project Site;
- Consideration of results from other local archaeological studies;
- Results of consultation with the registered Aboriginal parties;
- The assessed significance of the sites;
- Appraisal of the proposed development, and
- Legislative context for the development proposal.

It is recommended that:

1. No further archaeological assessment is warranted for the Project Site. All works must be within the area assessed for the Project.
2. Aboriginal heritage should be included within the Environment Management System (EMS) or equivalent for the Project. This must include an unexpected finds protocol for Aboriginal objects (see an example in Appendix B). Aboriginal heritage should also be included in any induction for the Project.
3. If unexpected Aboriginal objects are identified during works the relocation of the objects should be undertaken by a qualified archaeologist with a representative of the RAPs, as selected by the Proponent/Project Owner, and be consistent with Requirement 26 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*. The relocation area must be within the Subject Lots in an area that will not be disturbed into the future. If an alternative relocation area outside the Subject Lots for the Project is required due to unforeseeable reasons, additional consultation with the RAPs must occur.
4. In the unlikely event that human remains are discovered during the development works, all work must cease in the immediate vicinity and the unexpected find protocol followed. The local NSW police must be notified. Further assessment would be undertaken to determine if the remains were ancestral Aboriginal or not. In the event that any remains are determined to be ancestral Aboriginal in origin Heritage NSW must be notified.
5. Further archaeological assessment would be required if the proposed development activity extends beyond the area assessed. This would include consultation with the RAPs and may include further field survey.

All Aboriginal objects and places in NSW are protected under the *National Parks and Wildlife Act*. It is an offence to disturb an Aboriginal object or site without appropriate consent.

The Proponent should also note that consultation with the RAPs for the Project must be ongoing and maintained until the approval of this Project is issued by the relevant authority. Ongoing consultation with the RAPs has been defined by Heritage NSW for SSD Projects as comprising of consultation with no more than a maximum gap of six months between consultation events. This ongoing consultation with the RAPs until the approval of this Project must be appropriately documented and logged.

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Appendix A Consultation log and documentation

Redacted – available on request to Heritage NSW

Appendix B Unexpected Finds Protocol

B.1 Overview

Introduction

This unexpected find protocol has been developed to provide a method for managing unexpected Aboriginal heritage items identified during the construction and operation of the Project. The unexpected finds protocol has been developed to ensure the successful delivery of the Project while adhering to the NSW *National Parks and Wildlife Act 1974* (NPW Act) and standard requirements for State Significant Development (SSD) Projects. It is noted that this is in draft form and may be required to be amended pending the issuing of the Conditions of Consent for this Project.

All Aboriginal heritage objects are protected under the NPW Act Under Part 6 of the Act, though for a SSD project Development Consent may be issued that allows for conditional harm to Aboriginal objects. Despite undertaking appropriate heritage assessment prior to the commencement of works Aboriginal cultural heritage items may be encountered that were not anticipated which may be of scientific and/or cultural significance. Therefore, it is possible that unexpected heritage items may be identified during works. If this happens the following unexpected find protocol will be implemented to avoid breaching obligations under the NPW Act and/or the Development Consent for the Project. This unexpected find protocol provides guidance as to the circumstances under which finds may occur and the actions subsequently required.

What is a Heritage Unexpected Find?

An unexpected heritage find is defined as any possible Aboriginal object, that was not identified by the Project's heritage assessment and may not be covered by the development consent conditions. Such finds have potential to be culturally and/or scientifically significant and may need to be assessed prior to development impact.

Unexpected Aboriginal heritage finds specifically for this Project may include, but not be limited to:

- Aboriginal stone artefacts and hearths.
- Human skeletal remains.

Aboriginal Heritage Objects

All Aboriginal objects are protected under the NPW Act. 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 NSW, being habitation before or concurrent with the occupation of that area by persons on non-Aboriginal extraction and includes Aboriginal remains.

All Aboriginal objects are protected, and it is an offence to harm or desecrate an Aboriginal object or place.

B.2 Unexpected Human Skeletal Remains

If any human remains or suspected human remains are discovered during any works, all activity in the immediate area must cease immediately. The following plan describes the actions that must be taken in instances where human remains, or suspected human remains are discovered. Any such discovery must follow these steps.

Discovery:

- If any human remains or suspected human remains are found during any activity, works in the immediate vicinity must cease and the Project Manager must be contacted immediately.

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- The remains must be left in place and protected from harm or damage. To protect the remains until their origins can be determined high visibility markers or temporary fencing which will not cause ground disturbance must be immediately placed a minimum of 10 m around the location of the human remains or suspected human remains by site personnel. A minimum no work buffer zone radius of 30 m must be implemented around the remains by taping off the area as an environmental sensitive zone.
- All personnel should then leave the immediate vicinity of the area. The Projects Environmental Officer is responsible to ensure that these temporary measures are implemented onsite within 24 hours of identification.

Notification:

- The NSW Police must be notified immediately. Details of the location and nature of the human remains must be provided to the relevant authorities.
- If there are reasonable grounds to believe that the remains are Aboriginal, the following must also occur.
 - a. Heritage NSW must be contacted as soon as practicable and provide any available details of the remains and their location. The Environment Line can be contacted on 131 555.
 - b. The relevant Aboriginal community groups must be notified immediately when the remains are confirmed to be Aboriginal, as advised by Heritage NSW.
 - c. The relevant Project Archaeologist may be contacted to facilitate communication between the police, Heritage NSW and Aboriginal community groups.

Process:

- If the remains are considered to be Aboriginal by the Police and Heritage NSW no work can recommence at the particular location of the find unless authorised in writing by the appropriate consenting authority (ie Heritage NSW/DPHI).
- Recording of Aboriginal ancestral remains must be undertaken by, or be conducted under the direct supervision of, a specialist physical anthropologist or other suitably qualified person.
- Archaeological reporting of Aboriginal ancestral remains must be undertaken by, or reviewed by, a specialist physical anthropologist or other suitably qualified person, with the intent of using respectful and appropriate language and treating the ancestral remains as the remains of Aboriginal people rather than as scientific specimens.
- If the remains are considered to be Aboriginal ancestral by the Police and Heritage NSW, an appropriate management and mitigation, or salvage strategy will be implemented following further consultation with the consenting authority (i.e. Heritage NSW/DPHI) and the relevant Aboriginal community groups (as advised by Heritage NSW).

B.3 Unexpected Aboriginal object

In the event that any unexpected Aboriginal objects are discovered during works for the Project, within the approved development footprint, the following management protocols will be implemented.

1. All works must immediately stop in the area of the identified unexpected heritage item to prevent any further impacts to the object(s). No further harm to the object will occur. Personnel should notify their supervisor of the find, who will notify the project manager.
2. Establish an appropriate buffer zone of at least 20 metres to allow for the assessment and management of the find. All on site personnel will be informed about the buffer zone with no further works to occur within the buffer zone. The area will be secured to avoid any further harm to the

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Aboriginal object. The Projects Environmental Officer is responsible to ensure that the buffer zone and temporary measures are implemented onsite within 24 hours of identification.

3. A qualified archaeologist will be engaged to assess the object encountered and determine if it is an Aboriginal object, as defined by the NPW Act, or not. If a visual inspection of the unexpected find is required it should be undertaken with a minimum of one representative from the Registered Aboriginal Parties (RAP) for this Project, as selected by the Project Owner/Project Manager. If the no representative from the selected RAPs is available to participate in the inspection, the visual inspection of the unexpected object may be undertaken solely by a qualified archaeologist.
4. If determined to be an Aboriginal object by a qualified archaeologist the recording and collection of the Aboriginal object will be undertaken consistent with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*, including Requirement 26. For stone artefacts, which are considered the most likely type of unexpected find for this Project, at a minimum the recording and collection of the object would be undertaken. A new Aboriginal Heritage Information Management System (AHIMS) site card and a subsequent Aboriginal Site Impact Recording Form (ASIRF) must be completed and submitted for the unexpected find by the archaeologist with a brief letter style report on the actions completed by the archaeologist. The objects collected may be temporarily held in a locked secure location onsite or with the project archaeologist until the long-term storage/reburial of the objects can occur. The relocation area must be within the Subject Lots in an area that will not be subject to any future ground disturbance. If an alternative relocation area outside the Subject Lots for the project is required due to unforeseeable reasons, additional consultation with the RAPs must occur.
5. Following appropriate salvage of the unexpected find by a qualified archaeologist works may continue at this location.



NGH Pty Ltd

NSW • ACT • QLD • VIC

ABN 31 124 444 622 ACN 124 444 622

E: nggh@ngghconsulting.com.au

GOLD COAST

2B 34 Tallebudgera Creek Road
Burleigh Heads QLD 4220

T. (07) 3129 7633

SYDNEY REGION

Unit 17, 21 Mary Street
Surry Hills NSW 2010

T. (02) 8202 8333

BEGA

Suite 11, 89-91 Auckland Street
(PO Box 470)

Bega NSW 2550

T. (02) 6492 8333

MELBOURNE

Level 14, 10-16 Queen Street
Melbourne VIC 3000

T: (03) 7031 9123

TOWNSVILLE

Level 4, 67-75 Denham Street
Townsville QLD 4810

T. (07) 4410 9000

BRISBANE

T3, Level 7, 348 Edward Street
Brisbane QLD 4000

T. (07) 3129 7633

NEWCASTLE - HUNTER & NORTH COAST

Level 1, 31-33 Beaumont Street
Hamilton NSW 2303

T. (02) 4929 2301

WAGGA WAGGA - RIVERINA & WESTERN NSW

35 Kincaid Street (PO Box 5464)
Wagga Wagga NSW 2650

T. (02) 6971 9696

CANBERRA

Unit 8, 27 Yallourn Street
(PO Box 62)

Fyshwick ACT 2609

T. (02) 6280 5053

SUNSHINE COAST

Building 1, 30 Chancellor Village Boulevard
Sippy Downs QLD 4556

T: 13 54 93

WODONGA

Unit 2, 83 Hume Street
(PO Box 506)

Wodonga VIC 3690

T. (02) 6067 2533