Limondale Sun Farming Project, NSW: Heritage Management Plan

Prepared for RWE

9 October 2024

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- EMM Consulting: David Bone (on behalf of RWE)

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- Sonika Kumar (mapping)
- Lauren Harley (mapping)

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Glossary

ACHA	Aboriginal cultural heritage assessment
AHIP	Aboriginal heritage impact permit
CoA	Conditions of Approval
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DP	Deposited Plan
EA	Environmental Assessment
EP&A Act	*Environmental Planning and Assessment Act 1979*
EPBC Act	*Environment Protection Biodiversity Conservation Act 1999*
Heritage NSW	Heritage NSW, Department of Climate Change, Energy, the Environment and Water (previously Office of Environment and Heritage)
HMP	Heritage Management Plan
NPW Act	*National Parks and Wildlife Act 1974*
PAD	Potential archaeological deposit
RAP	Registered Aboriginal party
REF	Review of Environmental Factors

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1 Introduction

This Heritage Management Plan (HMP) document (Final Version 03) has been updated by Biosis Pty Ltd (Biosis) as of 20 September 2024 to include information to satisfy post-approval conditions of consent as required by Department of Planning, Housing and Infrastructure (DPHI) and in consultation with David Bone of EMM Consulting Pty Ltd (EMM Consulting) on behalf of RWE.

Changes made in this document version include the following:

- Addition of project description information to include elements of the battery energy storage system (BESS) in Section 1.1.
- Description of the approved project as outlined in Section 1.2.
- Information on the construction of the approved project as outlined in Section 1.3.
- Roles and Responsibilities updates and additional information in Section 6.1.
- Complaints handling information and protocols in Section 6.3.
- Addition of incident reporting requirements that have been updated due to the BESS Modification in Section 6.4.

This Heritage Management Plan (HMP) manages the impacts to Aboriginal and non-Aboriginal heritage of the Limondale Sun Farm ('the project').

1.1 Project background

The Limondale Solar Farm is a large-scale solar photovaltic (PV) generation facility in south-western New South Wales (NSW). The Limondale Solar Farm has been developed on a site within the Balranald Shire local government area (LGA), approximately 14 kilometres (km) south of the township of Balranald. The project layout for the BESS can be viewed in Figure 1 of the Limondale Solar Farm Modification 2 (SSD-8025-Mod-2) Modification Assessment Report (Department of Planning and Environment 2022)).

The Limondale Solar Farm, is a State significant development (SSD) under the State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP). Development consent (SSD 8025) under Section 89E of the *NSW Environmental Planning and Assessment Act 1979* (EP&A Act) was granted on 31 August 2017. That Currently has two modifications approved.

MOD 1 (SSD-8025-Mod-1) was approved on 27 July 2018 to modify the development consent including landscape changes, relocation of substation and other minor administrative changes.

MOD 2 (SSD-8025-Mod-2) was approved on 7 October 2022 to modify the development consent for the construction of a battery energy storage system (BESS) (the project) that does not exceed a total delivery capacity of 200 MW.

Biosis was commissioned by Limondale Sun Farm Pty Ltd (Overland) to undertake an Aboriginal cultural heritage assessment of the Limondale Sun Farm, a large-scale solar photovoltaic (PV) generation facility and associated infrastructure in the Murray Darling Depression bioregion of south-western NSW (the project). The Department of Planning and Environment is the consent authority and will assess the Environmental Impact Statement (EIS) to determine if the project is likely to have a significant effect on the environment, including Aboriginal cultural heritage.

An assessment of Aboriginal cultural heritage was required in accordance with the *Environmental Planning and Assessment Act 1979* (EP & A Act) and the *National Parks and Wildlife Act 1974* (NPW Act). The Aboriginal heritage assessment has been undertaken in accordance with the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011), *Code of Practice for Archaeological Investigation of Aboriginal objects in NSW* (OEH 2010) (the code) and *Aboriginal Cultural Heritage Consultation Requirements for proponents* (OEH 2010) (the due diligence code). The assessment included a field survey and a review of background resources including soil landscapes, geology, hydrology and past reports and site records to inform predictive statements about the likelihood of Aboriginal heritages sites to occur within the study area.

There are 22 Aboriginal cultural heritage sites registered with the Aboriginal Heritage Information Management System (AHIMS) register, both within the site boundary as well as in the vicinity. The Aboriginal community was consulted regarding the heritage management of the project throughout its lifespan. Consultation has been undertaken as per the process outlined in the DECCW document, *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010a) (consultation requirements).

The survey was conducted between 23 and 28 January 2017. Eleven previously unrecorded Aboriginal cultural heritage sites were identified during the field survey, including one with a Potential Archaeological Deposit (PAD). Two of the Aboriginal sites also had historical objects indicating that they are post-contact sites. In addition to the Aboriginal sites, there was also one historical site consisting of an old cottage found. This historical site will not be impacted by the project.

During the construction of the Limondale Sun Farm on 7 January 2020, EMM Consulting (as engaged by Belectric Australia Pty Ltd to assist in the identification and management of Aboriginal ancestral remains, discovered remains within Block 85 of the Limondale Sun Farm. Further information related to the discovery of these remains and the *Heritage Management Plan Update* is provided in Appendix D of this ACHMP report. The indicative location of Block 84 can be seen in Figure 1.1 of the *Heritage Management Plan Update* provided in Appendix D and is provided below in Plate 1.

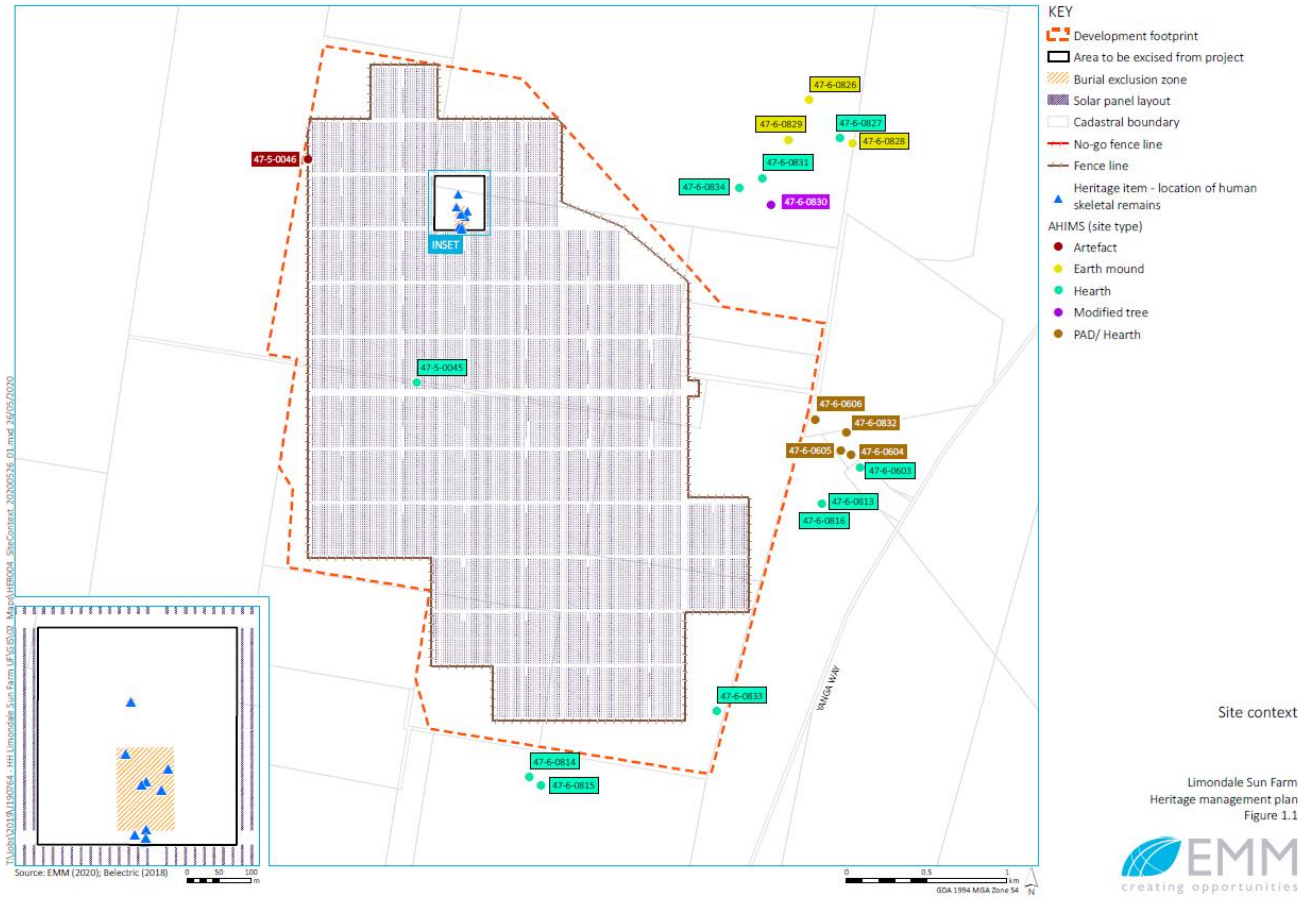


Plate 1. Indicative location (inset) of 'Block 84' where Aboriginal ancestral remains were discovered in January 2020 in the Limondale Sun Farm project area. Original figure can be observed in Figure 1.1 of the *Heritage Management Plan Update* by EMM Consulting provided in Appendix D of this ACHMP

1.2 Approved Project

Limondale Solar Farm consists of the following:

- Approximately 872,000 solar panels mounted on single axis-tracker frames, with a height of 4 metres (m).
- Up to 114 inverter stations (up to 2.3m in height), each containing an inverter and a 22 or 23 kilovolt (kV) transformer, and an onsite switchyard containing a transformer and associated switchgear.
- Internal access tracks, staff amenities, offices, car parking, laydown areas, security fencing.
- A 220 kV underground power line connecting to the existing Balranald Substation that is situated 500 m to the east of the Project.

The Limondale Solar Farm BESS, as Modification 2 of the Project, consists of the following:

- A lithium-ion battery storage facility, with a 50MW battery discharging over eight hours.
- Overhead and underground lines (as per approved Option 1) connecting the onsite substation to the Limondale Substation.

The BESS will be constructed on the eastern side of the solar farm, as shown in Appendix A of the Development Consent, with cabling via overhead lines. No vegetation clearing is required.

The solar farm has been constructed and full commercial operation began in 2021. The BESS will be constructed as a stand-alone project. No staging is proposed.

1.3 Construction of the Limondale Solar Farm BESS

1.3.1 Overview

The project comprises the following key components:

- A network of PV solar panel arrays.
- Electrical collection systems, switchyard and control room.
- An operation and maintenance building (offices, amenities and equipment sheds).
- Parking and internal access roads.
- A 50MW BESS.
- Connection infrastructure to the Balranald Substation.

1.3.2 Construction Method

Site establishment works and preparation for construction of the BESS includes:

- The establishment of a fenced off area within the development footprint including a site office, containers for storage and parking areas.
- Use of the site access intersection and access road from Yanga Way.
- Construction of adjusted boundary fencing.
- Site survey to confirm infrastructure positioning and placement.
- Delivery of BESS Li-ion units.
- Connection of units to the existing electrical infrastructure using approved Option 1 overhead and underground connections.

Upon completion of the site establishment and pre-construction activities described above, construction typically involves:

- Foundations for BESS units will be prepared.
- Installation of BESS units.
- Permanent fencing and security will be constructed.
- Connection to existing electrical infrastructure.

1.4 Study area

The study area is located approximately 14 kilometres south of Balranald within the Balranald Local Government Area (LGA), Parish of Balranald, County of Caira (see Figure 1). The study area encompasses 2,058 hectares of private land and the adjacent road reserves as shown in Figure 2. It is bounded by Yanga Way to the east and is surrounded by other large farming properties. The study area is zoned RU1 Primary

Production with portions of the site identified as having high conservation values under the Balranald Local Environmental Plan 2010 (Balranald LEP).

1.5 General scope of works

The project includes the development, construction and operation of a solar PV electricity generation facility, which comprises the installation of PV solar panels and associated infrastructure on the site. The project will connect to the Transgrid 220 kV electricity distribution network that originates at the Balranald 220 kV Substation. The electricity and associated environmental products generated from the project will be sold to one or more of a registered energy retailing organisation, large energy users (governmental or private) or to the National Electricity Market that is managed by the Australian Energy Market Operator.

The project will have an estimated capacity in the order of 250 MW and comprises the following key components:

- a network of PV solar panel arrays.
- electrical collection systems, switchyard and control room.
- a management hub, including demountable offices and amenities and equipment sheds.
- parking and internal access roads.
- easement and connection infrastructure to the Balranald 220 kV Substation.

The development footprint is defined as the land area within the site where project infrastructure will be constructed and operate for the project life. The development footprint encompasses an area of 1532 ha, which has been refined through the project design process to avoid environmental constraints (primarily remnant vegetation and Aboriginal heritage).

1.6 Purpose and objectives

The purpose of this HMP is to describe how Aboriginal and non-Aboriginal heritage will be protected and managed by RWE during the project. The key objective of the HMP is to ensure that impacts to Aboriginal and non-Aboriginal heritage are minimised and within the scope permitted by the project Approval. Specific objectives include:

- updated baseline mapping of the heritage items within and adjoining the development disturbance area
- a chance finds procedure developed in consultation with Heritage NSW, Department of Climate Change, Energy, the Environment and Water (Heritage NSW) and Aboriginal stakeholders for the management of any unidentified finds
- a methodology for test excavations of potential Archaeological deposits 47-6-0605 and 47-6-0606 in accordance with *Code of Practice for Archaeological Investigation of Aboriginal Objects* (DECCW, 2010) and including a description of the measures that would be implemented to manage the impacts of the development
- a description of the measures that would be implemented for:
  - protecting Aboriginal heritage sites outside the development disturbance area
  - minimising and managing the impacts of the development on heritage items within the disturbance footprint, including salvage of heritage items L1, L9 and L11, and a strategy for

the long term management of any Aboriginal heritage items or material collected during the test excavation or salvage works

- a contingency plan and reporting procedure if Aboriginal heritage items outside the approved disturbance area are damaged
- ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions
- ongoing consultation with Aboriginal stakeholders during the implementation of the plan

- a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.

This HMP should be read in conjunction with the following documents:

- Balranald sun farming project: Aboriginal cultural heritage assessment report (Biosis 2017).
- Balranald sun farming project: Archaeological report (Biosis 2017).
- *Heritage Management Plan Update – Unexpected finds: Aboriginal ancestral remains at Limondale Sun Farm* (provided in Appendix D of this ACHMP).

1.7 Heritage Management Plan conditions

The conditions of the Heritage Management Plan and their location within this document are described below in Table 1.

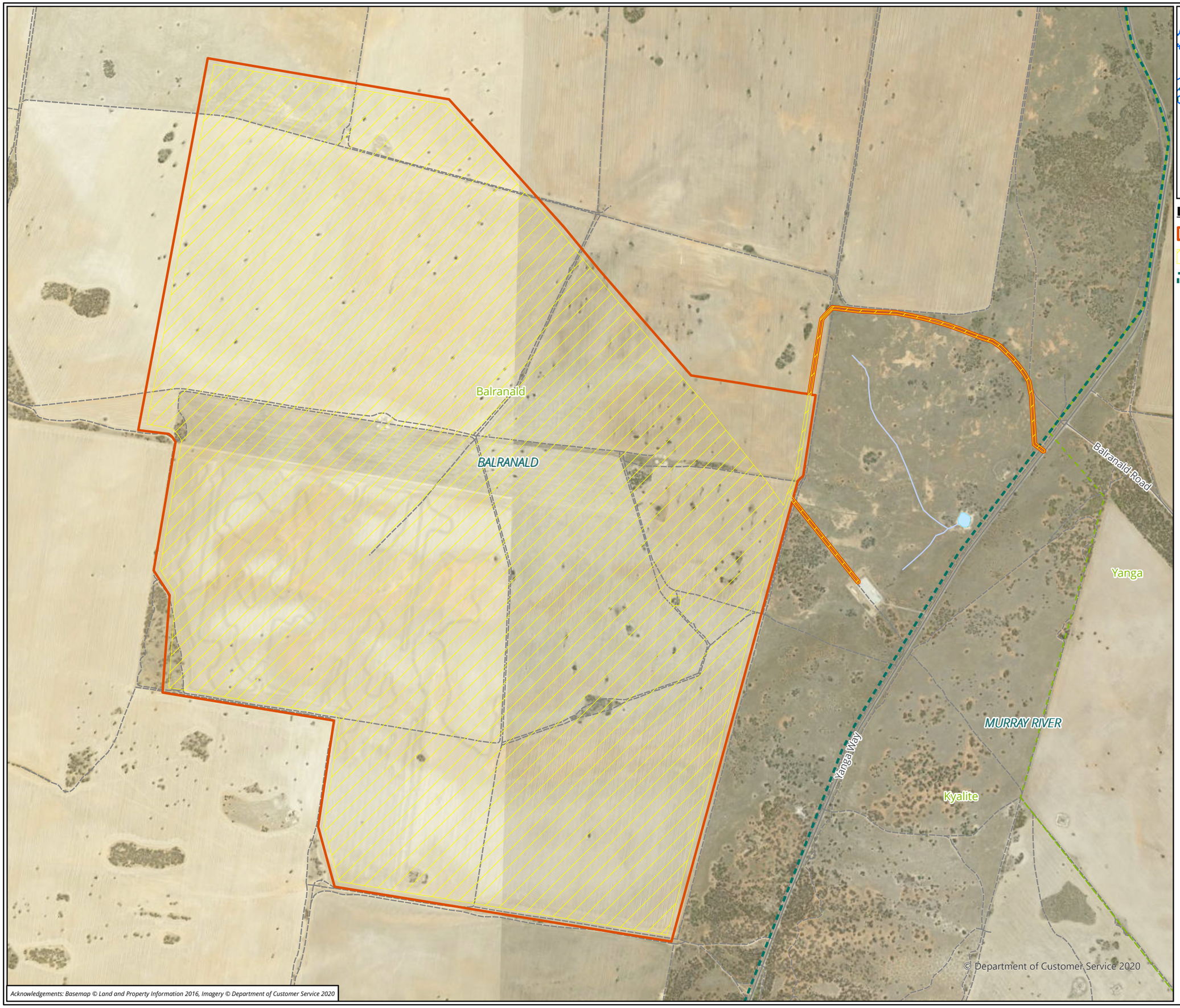
Table 1 Heritage Management Plan conditions

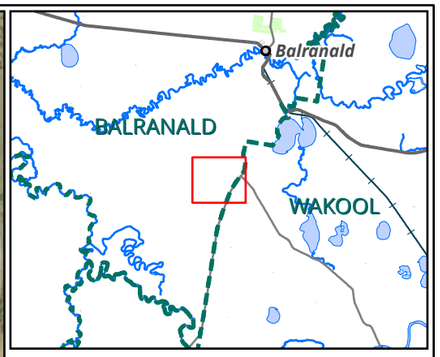
Part	Description	Location within HMP
(a)	Be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Secretary.	Section 1.8
(b)	Be prepared in consultation with Heritage NSW and Aboriginal stakeholders.	Appendix B
(c)	Include updated baseline mapping of the heritage items within and adjoining the development disturbance area.	Figure 1, Figure 2 and Figure 3
(d)	A chance finds procedure developed in consultation with Heritage NSW and Aboriginal stakeholders for the management of any unidentified finds.	Appendix C and Appendix D
(e)	Include a methodology for test excavations of potential Archaeological deposits 47-6-0605 and 47- 6-0606 in accordance with *Code of Practice for Archaeological Investigation of Aboriginal Objects* (DECCW, 2010) and including a description of the measures that would be implemented to manage the impacts of the development.	Section 5.2.6
(f)	Include a description of the measures that would be implemented for: • protecting Aboriginal heritage sites outside the development disturbance area;	Section 5.2.2
	• minimising and managing the impacts of the development on heritage items within the disturbance footprint, including: - salvage of heritage items L1, L9 and L11; and - a strategy for the long term management of any Aboriginal heritage items or material collected during the test excavation or salvage works;	Section 5.2.7 Section 5.2.8

Part	Description	Location within HMP
	• a contingency plan and reporting procedure if: - Aboriginal heritage items outside the approved disturbance area are damaged;	Section 5.2.3
	• ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions;	Section 5.2.1
	• ongoing consultation with Aboriginal stakeholders during the implementation of the plan	Section 5.2.9
(g)	A program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.	Section 5.2.10

1.8 Contributors

This HMP was prepared by Samantha Keats, Archaeologist and Dr Amanda Markham, Senior Archaeologist at Biosis. This report has been reviewed by Amanda Atkinson and Anthea Vella, Team Leader – Heritage (NSW), Biosis.





Legend

- Development footprint
- Infrastructure area
- Local Government Area

Figure 1 Location map - Limondale Sun Farm

0 150 300 450 600 750

Metres

Scale: 1:18,000 @ A3

Coordinate System: GDA2020 MGA Zone 54

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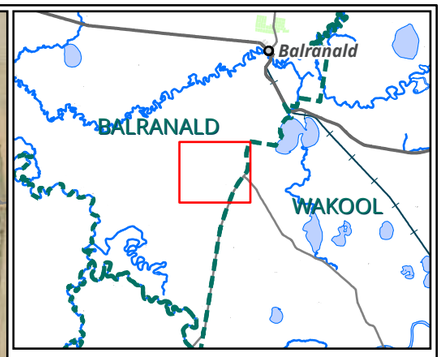
Matter: 41404,
Date: 09 October 2024 ,
Prepared for: JC, Prepared by: LH, Last edited by: lharley
Layout: 41404_CHMP_F1_Location
Project: P:\41400s\41404\Mapping\
41404_LimondaleSF_BMP_ACHMP.aprx

Acknowledgements: Basemap © Land and Property Information 2016, Imagery © Department of Customer Service 2020



Legend

- Study area
- Development footprint
- Infrastructure area

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Figure 2 Location of the study area

0 200 400 600 800 1,000

Metres

Scale: 1:24,000 @ A3

Coordinate System: GDA2020 MGA Zone 54

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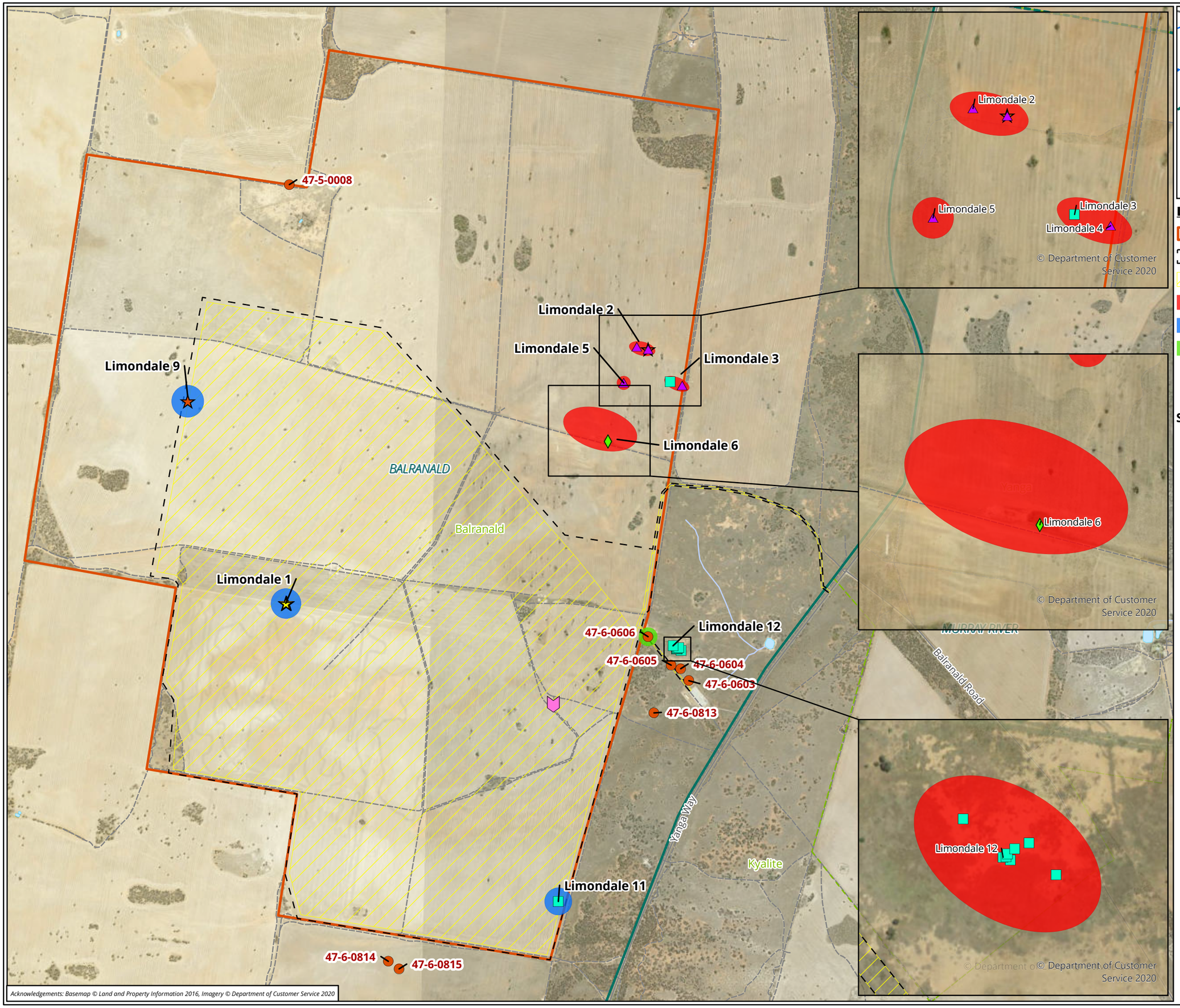
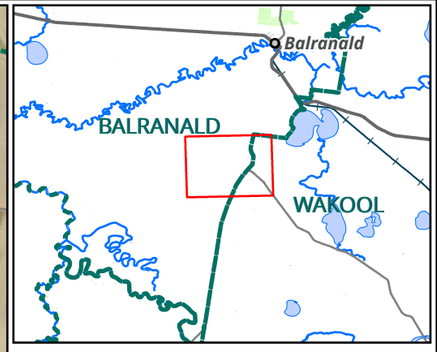
Matter: 41404,
Date: 09 October 2024 ,
Prepared for: JC, Prepared by: LH, Last edited by: lharley
Layout: 41404_CHMP_F2_StudyArea
Project: P:\41400s\41404\Mapping\
41404_LimondaleSF_BMP_ACHMP.aprx





Legend

- Study area
- Development footprint
- Infrastructure area
- No-Go Zone
- Salvage
- Further Work - Test excavations
- AHIMS Records
- House

Site Type

- Artefact Scatter with Hearth
- Earth Mound
- Hearth
- Modified Tree
- Surface Artefacts

Figure 3 Results Map

0 200 400 600 800 1,000

Metres

Scale: 1:24,000 @ A3

Coordinate System: GDA2020 MGA Zone 54

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Date: 08 October 2024 ,
Prepared for: JC, Prepared by: LH, Last edited by: lharley
Layout: 41404_CHMP_F3_Results
Project: P:\41400s\41404\Mapping\
41404_LimondaleSF_BMP_ACHMP.aprx

2 Environmental requirements

The following section outlines the environmental requirements of the project including relevant legislation and guidelines that have been used to assist in the formulation of this HMP.

2.1 Relevant legislation and guidelines

Legislation relevant to heritage management includes:

- *Environmental Planning and Assessment Act 1979* (EP&A Act)
- *National Parks and Wildlife Act 1974* (NPW Act)
- *Heritage Act 1977* (Heritage Act)

The main guidelines, specifications and policy documents relevant to this HMP include:

- *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW, 2010)
- *Altering Heritage Assets* (Heritage Office and DUAP 1996)
- *Assessing Significance for Archaeological Heritage Sites and Relics* (NSW Heritage Branch Department of Planning)
- *Archaeological Assessment Guidelines* (NSW Heritage Office and NSW Department of Urban Affairs and Planning 1996)
- *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* (2013)
- *The code of practice for the investigation of Aboriginal objects in New South Wales 2010 (DECCW, 2010).*

2.2 Commitment to Cultural Heritage Preservation

According to Allen and O'Connell (2003), Aboriginal people have inhabited the Australian continent for the last 50,000 years, and the NSW area, according to Bowler *et al* (2003), for over 42,000 years. These dates are subject to continued revision as further evidence of Aboriginal cultural heritage is discovered and as more research of this evidence is conducted.

Without being part of the Aboriginal culture, and the productions of this culture, it is not possible for non-Aboriginal people to fully understand their meaning to Aboriginal people – only to move closer towards understanding this meaning with the help of the Aboriginal community. Similarly, definitions of Aboriginal culture and cultural heritage without this involvement constitute outsider interpretations.

With this preface, Aboriginal cultural heritage broadly refers to things that relate to Aboriginal culture and hold cultural meaning and significance to Aboriginal people (DECCW 2010, p. 3). There is an understanding in Aboriginal culture that everything is interconnected. In essence, Aboriginal cultural heritage can be viewed as potentially encompassing any part of the physical and/or mental landscape, that is, 'Country' (DECCW 2010, p. iii).

Aboriginal people's interpretation of cultural value is based on their "traditions, observance, lore, customs, beliefs and history" (DECCW 2010, p. 3). The things associated with Aboriginal cultural heritage are continually / actively being defined by Aboriginal people (also see DEC 2005, p. 1; DECCW 2010, p. 3). These things can be

associated with traditional, historical or contemporary Aboriginal culture (also see DEC 2005, p. 1, 3; DECCW 2010, p. 3).

2.2.1 Tangible Aboriginal Cultural Heritage

Three categories of tangible Aboriginal cultural heritage may be defined:

- Things that have been observably modified by Aboriginal people
- Things that may have been modified by Aboriginal people but no discernible traces of that activity remain
- Things never physically modified by Aboriginal people (but associated with Dreamtime Ancestors who shaped those things)

2.2.2 Intangible Aboriginal Cultural Heritage

Examples of intangible Aboriginal cultural heritage would include memories of stories and 'ways of doing', which would include language and ceremonies (DECCW 2010, p. 3).

2.2.3 Statutory

Currently Aboriginal cultural heritage, as statutorily defined by the *National Parks and Wildlife Act 1974*, consists of objects and places.

Aboriginal objects are defined as:

> *"any deposit, object or material evidence…relating to the Aboriginal habitation of the area that comprises NSW, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains"*

Aboriginal places are defined as a place that is or was of special Aboriginal cultural significance. Places are declared under section 84 of the *NPW Act 1974*.

2.2.4 Values

Aboriginal cultural heritage is broadly valued by Aboriginal people as it is used to define their identity as both individuals and as part of a group (also see DEC 2005, p. 1, 3; DECCW 2010, p. iii). More specifically it is used:

- To provide a:
  - "*connection and sense of belonging to Country*" (DECCW 2010, p. iii)
  - Link between the present and the past (DECCW 2010, p. iii)
- As a learning tool to teach Aboriginal culture to younger Aboriginal generations and the general public (DECCW 2010, p. 3)

As further evidence of Aboriginal occupation prior to European settlement for people who do not understand the magnitude to which Aboriginal people occupied the continent (see also DECCW 2010, p. 3).

The NSW government and all of its entities are committed the protection and preservation of Aboriginal and non-Aboriginal cultural heritage in NSW and on the Darcoola West Water Efficiency Scheme.

3 Existing environment

The following sections summarise what is known about Aboriginal and non-Aboriginal heritage within and adjacent to the study area based on information provided in:

- Balranald sun farming project: Aboriginal cultural heritage assessment report (Biosis 2017).
- Balranald sun farming project: Archaeological report (Biosis 2017).

3.1 Aboriginal cultural heritage

The Aboriginal cultural heritage values were subject to assessment through the following processes:

- Literature and database review
- Archaeological survey
- Aboriginal consultation
- Assessment of significance and proposed impacts

Based upon these tasks thirteen Aboriginal heritage sites are associated with the project have been identified, these are detailed in Table 2 and their locations are identified in Figure 3 **Error! Reference source not found.** and in the *Heritage Management Plan Update* document in Appendix D. The indicative location of Block 84 where Aboriginal remains were discovered is provided in Section 1.1 in Plate 1 and in Figure 1.1 of the *Heritage Management Plan Update* document in Appendix D of this ACHMP.

Table 2 Aboriginal heritage sites associated with the project

Site	Description	Significance
Limondale 1 (47-5-0045)	Limondale 1 is a hearth with associated artefact scatter located on a graded track. The hearth is relatively intact and it appears to continue below the surface indicating some subsurface integrity may exist. The associated artefact scatter is in situ. This site type is common for the region and is in good condition so it is considered to have moderate significance.	Moderate
Limondale 2 (47-6-0826)	Limondale 2 is a complex of two disturbed earth mounds. Earth mounds are considered to have high scientific and cultural significance as they have potential to contain human remains however these earth mounds are highly disturbed and have been continuously ploughed. Some characteristics still exist so this site is considered to have moderate significance.	Moderate
Limondale 3 (47-6-0827)	Limondale 3 is a scattered hearth; there is no site integrity due to ongoing ploughing. The site type is common in the region and due to the disturbed nature it is considered to have low significance.	Low
Limondale 4 (47-6-0828)	Limondale 4 is a diffuse earth mound measuring approximately 30 by 30 metres on a Murrumbidgee scalded plain. Earth mounds are considered to have high scientific and cultural significance as they have potential to contain human	Moderate

Site	Description	Significance
	remains however these earth mounds are highly disturbed and have been continuously ploughed. Some characteristics still exist so this site is considered to have moderate significance.	
Limondale 5 (47-6-0829)	Limondale 5 is a diffuse earth mound measuring approximately 20 by 30 metres on a Murrumbidgee scalded plain. Earth mounds are considered to have high scientific and cultural significance as they have potential to contain human remains however these earth mounds are highly disturbed and have been continuously ploughed. Some characteristics still exist so this site is considered to have moderate significance.	Moderate
Limondale 6 (47-6-0830)	Limondale 6 is a modified box tree measuring 2 metres in circumference with a small oval scar bearing four steel axe marks facing west on its lower trunk. Scar trees hold high significance to the local Aboriginal community. The scar is in good condition and is easy identifiable as being made by humans due to a number of steel axe marks. This site is of high scientific and cultural significance.	High
Limondale 7 (47-6-0831)	Limondale 7 is a disturbed site complex measuring 50 by 100 metres and consisting of a series of heavily disturbed hearths with associated historic material on a Murrumbidgee scalded plain. The historic relics at this site add a degree of significance as it shows post-contact use of European items by Aboriginal people. Earth mounds are considered to have high scientific and cultural significance as they have potential to contain human remains however these earth mounds are highly disturbed and have been continuously ploughed. Some characteristics still exist so this site is considered to have moderate significance.	Moderate
Limondale 8 (47-6-0834)	Limondale 8 is a disturbed site complex measuring 100 by 100 metres and consisting of a series of heavily disturbed hearths with associated historic material on a Murrumbidgee scalded plain. The historic relics at this site add a degree of significance as it shows post-contact use of European items by Aboriginal people. Earth mounds are considered to have high scientific and cultural significance as they have potential to contain human remains however these earth mounds are highly disturbed and have been continuously ploughed. Some characteristics still exist so this site is considered to have moderate significance.	Moderate
Limondale 9 (47-5-0046)	Limondale 9 was an isolated find, a longitudinal silcrete flake fragment with a feather termination, found exposed in a ploughed area of white sand dune. Stne flakes are a common site type in the region and this site has been highly disturbed by ploughing. It has low scientific significance.	Low
Limondale 11 (47-6-0833)	One isolated hearth feature, Limondale 11, was located on a flat between Mallee cliff sand dunes in the southern portion of the study area. The site consists of burnt calcrete heat retainers and is the only hearth of this type identified during the survey. The site has been highly disturbed by ploughing and has low scientific significance.	Low

Site	Description	Significance
Limondale 12 (47-6-0832)	One site complex with an associated PAD, Limondale 12, was identified within these clay pans during the survey. It consisted of eight burnt clay heat retainer hearths, six of which also contained fragments of termite mound. The hearths are relatively intact and it appears to continue below the surface indicating some subsurface integrity may exist. This site has high scientific significance.	Moderate
Transmission Line 3 (47-6-0603)	Hearth. No report available on AHIMS. This site has moderate scientific significance.	Moderate
Transmission Line 4 (47-6-0604)	Hearth with Potential Archaeological Deposit. No report available on AHIMS. This site has moderate scientific significance.	Moderate
Transmission Line 5 (47-6-0605)	Hearth with Potential Archaeological Deposit. No report available on AHIMS. This site has moderate scientific significance.	Moderate
Transmission Line 6 (47-6-0606)	Hearth with Potential Archaeological Deposit. No report available on AHIMS. This site has moderate scientific significance.	Moderate
Transmission Line 7 (47-5-0008)	Earth Mound, artefact, habitation structure and Potential Archaeological Deposit (PAD). No report available on AHIMS. This site has high scientific significance.	High

3.2 Non-Aboriginal heritage

The assessment of non-Aboriginal heritage values within the study area was undertaken through the completion of the following tasks:

- Literature and database review
- Archaeological survey
- Assessment of proposed impacts

Table 3 Non-Aboriginal heritage sites associated with the project

Description	Significance
During the archaeological survey, one historical site was identified. This consisted of a series of weatherboard structures with corrugated iron roofing. The buildings are in deteriorating, poor condition. This item will not be impacted by the development, therefore was not assessed.	Not assessed but likely to be locally significant

4 Environmental aspects and impacts

The key construction activities and the associated potential impacts to heritage values (both Aboriginal and non-Aboriginal) were identified through a risk management approach. The consequence and likelihood of each activity's impact on the environment was assessed to prioritise its significance.

4.1 Aboriginal heritage impacts

The potential impacts on Aboriginal heritage recordings include:

- Direct impacts and disturbance to the entire site or the majority of a site containing Aboriginal objects due to the construction of the project. This impact can be complete or partial.
- Indirect impacts to Aboriginal objects or cultural values, such as from development related changes to the landscape or scenic context of a site or item.

Impacts to Aboriginal heritage sites as outlined in Balranald sun farming project: Aboriginal cultural heritage assessment report and archaeological report (Biosis 2017) are presented in Table 4.

Table 4 Impacts to Aboriginal heritage sites

AHIMS site no.	Site name	Significance	Type of harm	Degree of harm	Consequence of harm
47-5-0045	Limondale 1	Moderate	Total	Total	Total loss of vale
47-6-0826	Limondale 2	Moderate	None	None	No loss of value
47-6-0827	Limondale 3	Low	None	None	No loss of value
47-6-0828	Limondale 4	Moderate	None	None	No loss of value
47-6-0829	Limondale 5	Moderate	None	None	No loss of value
47-6-0830	Limondale 6	High	None	None	No loss of value
47-6-0831	Limondale 7	Moderate	None	None	No loss of value
47-6-0834	Limondale 8	Moderate	None	None	No loss of value
47-5-0046	Limondale 9	Moderate	Direct	Total	Total loss of value
47-6-0833	Limondale 11	Low	Direct	Total	Total loss of value
47-6-0832	Limondale 12	Moderate	None	None	No loss of value
47-6-0605	Transmission Line 6	Moderate	Total	Total	Total loss of vale
47-6-0606	Transmission Line 5	Moderate	Total	Total	Total loss of vale

In the event that additional disturbance is anticipated to occur outside of the CoAs; then these disturbances will need to undergo additional heritage assessment and impact mitigation processes prior to the commencement of any associated works. It is likely that any additional impacts outside of the CoAs would need to be assessed as a modification to the existing approval.

The indicative location of Block 84 where Aboriginal ancestral remains were discovered is provided in Plate 1 in section 1.1, and Figure 1.1 of the *Heritage Management Plan Update* document in Appendix D of this ACHMP.

4.2 Non-Aboriginal heritage impacts

The potential impacts of the project on non-Aboriginal heritage can be categorised as follows:

- A whole or complete degree of direct impact to a heritage item resulting in the physical loss of the item.
- Partial or minor direct impact to heritage item(s).
- Indirect impacts, such as to the contextual and landscape values associated with an item.
- Indirect impact to items of heritage which could be moved to avoid direct impact and as a consequence lose contextual integrity.
- No significant impact. This category involves instances where the development would either not pose an impact to a heritage item (direct or indirect) or any impacts would be insignificant and would not reduce the heritage value or significance of the item.

Table 5 Impacts to non-Aboriginal heritage sites

Description	Significance	Type of impact	Degree of impact	Impact
Weatherboard cottage and outbuildings	Not assessed	None	None	No significant impact

5 Environmental mitigation measures

5.1 Construction related measures

A range of environmental requirements are identified in the CoA. Specific mitigation measures to address impacts on Aboriginal and non-Aboriginal heritage are outlined in Table 6. Where required, further details of the proposed mitigation measures are provided in Section 5.2

Table 6 Construction related measures

Strategy	Requirement	Personnel
1	Heritage inductions to be completed as part of the overall site induction	Project Manager/ Archaeologist
2	Protection of Aboriginal heritage sites outside of the development disturbance area	Project Manager/ Archaeologist
3	Procedure to follow in the event of unexpected Aboriginal finds	Construction contractor
4	Procedure to follow in the event of unexpected non- Aboriginal finds	Construction contractor
5	Procedure to follow in the event of the discovery of human remains	Construction contractor
6	Complete all onsite works associated with the Aboriginal heritage test excavations and salvage strategy	Project Manager/Archaeologist

5.2 Heritage protection management strategies

5.2.1 Strategy 1: Heritage inductions and tool box talks

All contractors and RWE staff working on site will undergo site induction training (Or be supervised by a staff member that has had the relevant training) relating to Aboriginal and non-Aboriginal heritage management issues. The induction training will address elements related to heritage management including:

- Requirements of this HMP and relevant legislation.
- Roles and responsibilities for heritage management.
- Location of identified heritage sites.
- Proposed heritage management and protection measures including the progress of the Aboriginal and non-Aboriginal salvage works.
- Basic identification skills for Aboriginal and non-Aboriginal artefacts and human remains.
- Specific training for personnel working in the vicinity of Aboriginal and non-Aboriginal heritage sites identified on sensitive area mapping.
- Procedure to follow in the event of an unexpected heritage item find during construction works.

- Procedure to follow in the event of discovery of human remains during construction works.
- Penalties and non-compliance with this HMP.

Training records for all project personnel will be kept and maintained in a register detailing names, dates, content and type of training undertaken. This HMP should be kept on site at all times and be readily accessible. The requirements of the HMP and the unexpected finds protocols should be incorporated into tool box talks, where works are commencing in the vicinity of heritage items or sites, the mapping presented in this report should be reviewed and management measures assessed to ensure no impacts beyond the CoAs are likely to take place.

5.2.2 Strategy 2: Protection of Aboriginal heritage sites outside the development disturbance area

The boundaries of all Aboriginal heritage sites that are located outside of the development disturbance will be clearly marked with star pickets and high visibility flagging tape to ensure that no impacts can occur to these sites. These sites shall be clearly identified to all personnel working on site during induction. In addition, the infrastructure area will be demarcated in a similar fashion to define the construction area.

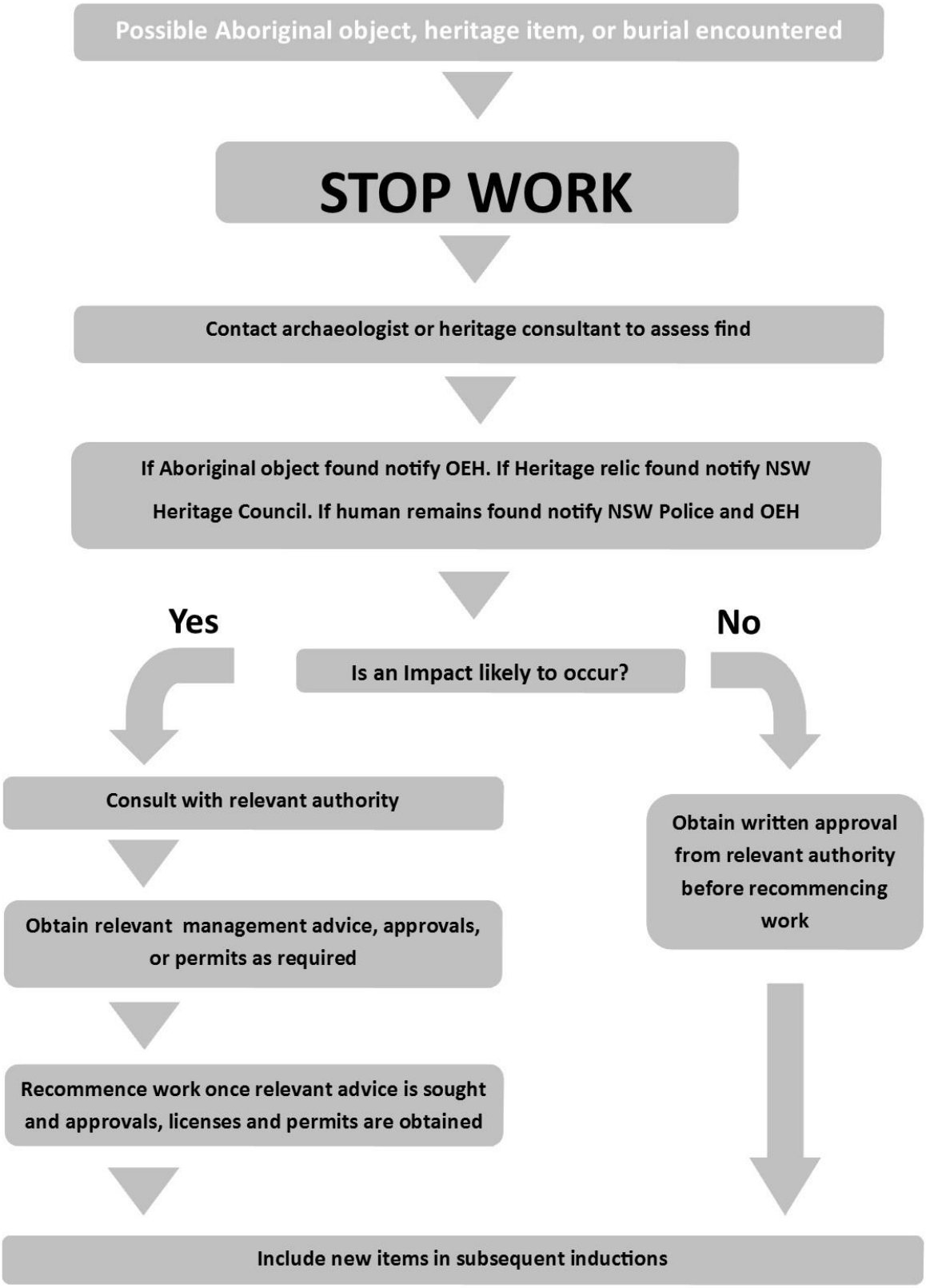
5.2.3 Strategy 3: Contingency plan if Aboriginal heritage items outside the approved disturbance area are damaged

In the event that Aboriginal heritage items outside of the approved disturbance area are damage, RWE must advise Heritage NSW immediately. Heritage NSW can be contacted through Environmental Line on 131 555 as soon practical. Establish an appropriate no go zone until the area can be inspected and advice sought from Heritage NSW on how to proceed.

5.2.4 Strategy 4: Procedure to follow in the event of unexpected Aboriginal finds

Please refer to the Chance Finds Protocol in Appendix C and Appendix D for full detail.

Please note that Appendix A contains guidelines around the identification of Aboriginal objects and site types.


Possible Aboriginal object, heritage item, or burial encountered
STOP WORK
Contact archaeologist or heritage consultant to assess find
If Aboriginal object found notify OEH. If Heritage relic found notify NSW Heritage Council. If human remains found notify NSW Police and OEH
Is an Impact likely to occur?
Yes
No
Consult with relevant authority
Obtain relevant management advice, approvals, or permits as required
Recommence work once relevant advice is sought and approvals, licenses and permits are obtained
Obtain written approval from relevant authority before recommencing work
Include new items in subsequent inductions

5.2.5 Strategy 5: Procedure to follow in the event of unexpected non-Aboriginal finds

The CoAs allow for impacts to known non-Aboriginal items within the study area. Where additional items are identified, an assessment will need to be made as to the significance of the item. Non-Aboriginal) heritage items may include Archaeological 'relics' or other non-Aboriginal items (i.e. works, structures, buildings or movable objects). The *Heritage Act 1977* defines a relics as:

> *"...any deposit, artefact, object or material evidence that relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and is of State or local heritage significance..."*

The following process should be followed with respect to unexpected items:

- Should any suspected non-Aboriginal items be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist.
- The archaeologist will investigate and assess the non- Aboriginal item to determine the nature, extent and significance of the find. This will enable recommendations to be provided on how work can proceed and whether any further work is required. The archaeologist must supply written advice to the Project Manager within 24 hours stating:
  - Determination of whether the find is a relic
  - Advice on whether how the project is to proceed and whether the establishment of any no-go areas is necessary.
  - Recommendation on further works that may be required and timeframe for completion of these works.
- NSW Heritage Division may need to be notified. This will include a statement concerning the find, management measures implemented and notification of any further works arising.
- Should any Aboriginal objects be identified, this will trigger a review of this HMP in accordance with Section 7.

5.2.6 Strategy 6: Procedure to follow in the event of the discovery of human remains

If any suspected human remains are discovered during all activity in the area must cease. The following process must be undertaken:

- Immediately cease all work at that location and not further move or disturb the remains.
- Notify the NSW Police, Planning and Infrastructure and Heritage NSW 's Environmental Line on 131 555 as soon as practicable and provide details of the remains and their location.
- Establish an appropriate no-go area. This will need to be established in consultation with NSW Police, Heritage NSW and if necessary a qualified archaeologist.
- Works will not be able to recommence within the location of the find until confirmation from NSW Police and Heritage NSW is obtained. If the remains are confirmed as not being human then works may recommence. In the event that remains are human then consultation, with NSW Police, Heritage NSW and the Aboriginal stakeholders to establish a plan of management.
- Works in the vicinity of the find will only be able to commence once the plan of management has been established and approval has been obtained from all relevant parties.

- Should any human remains be identified, this will trigger a review of this CHMP in accordance with Section 7.

5.2.7 Strategy 7: Complete all onsite works associated with Aboriginal heritage

The following additional requirements of the Conditions of Consent must be completed prior to construction:

Test excavation methodology

Test excavations at AHIMS 47-6-0605 and 47-6-0606 will conform to the following methodology:

- Test excavations will be conducted in 50 x 50 centimetre units
- A series of 50 x 50 centimetre test excavation pits will be excavated in the areas of proposed impact at 47-6-0605 and 47-6-0606. They will be spaced at 20 metre, 10 metre or other suitable intervals, in order to determine the nature and presence of any possible sub-surface deposit
- All test excavation points will be separated by a minimum of 5 metres
- Should test excavation units need to be combined to gain a greater understanding the site characteristics, the maximum continuous surface area at a single excavation point shall not exceed $3m^2$
- The maximum surface area of all test excavation units must be no greater than 0.5% of the area – either PAD or site – being investigated. Note this does not apply if the 50cm x 50cm excavation unit is greater than 0.5% of the site or PAD being investigated
- The test pits will be excavated by hand (inclusive of trowels, spades and other hand tools) along transects at intervals of between 10 – 20 metres or other justifiable and regular spacing (being no smaller than five metres)
- The first test pit within a site or PAD area will be excavated in five centimetre spits; the subsequent test pits conducted within the site or PAD area can then be excavated in either 10 centimetre spits or stratigraphic units (whichever is smaller) to the base of Aboriginal object-bearing units
- All material excavated from the test excavation units must be dry sieved using 3 or 5 millimetre aperture wire-mesh sieves
- Test excavation units must be excavated to at least the base of the identified Aboriginal object-bearing units, and must continue to confirm the soils below are culturally sterile
- All consolidated in-situ features must be excavated to the extent of the feature. This may require extending pits.
- All cultural material will be collected, bagged and clearly labelled. They will be temporarily stored in the Biosis office for analysis (at 8 Tate Street, Wollongong, NSW).
- For each test pit that is excavated, the following documentation will be taken:
  - Unique test pit identification number.
  - GPS coordinate of each test pit.
  - Munsell soil colour, texture and pH.
  - Amount and location of cultural material within the deposit.
  - Nature of disturbance where present.
  - Stratigraphy.

- Archaeological features (if present).
- Photographic records.
- Spit records.

- Test excavation units will be backfilled as soon as practicable
- An AHIMS Site Impact Recording form will be completed and submitted to the AHIMS Registrar for any sites impacted during test excavations.
- All faunal remains recovered from the test pits will be analysed in the field or in-situ using the following method:
  - MNI-Minimum number of individual animals represented in each discrete area and on site overall.
  - MNE-Minimum number of elements represented in each discrete area and on site overall.
  - NISP- Number of species represented in each discrete area and on site overall.
  - Dimensions of each element
  - Butchery/heat marks
  - Pathologies
  - All faunal remains will be photographed in-situ to understand the relationship of the remains with other artefactual material.
- Any datable material will be collected for the purposes of radiometric or AMS dating. Datable materials will be collected, bagged and clearly labelled. They will be temporarily stored in the Biosis office at 8 Tate Street, Wollongong before being sent to the University of Waikato Radiocarbon Dating Laboratory.
- In the event that suspected human remains are identified works will immediately cease and the NSW Police and Heritage NSW will be notified.
- Test excavations will cease when enough information* has been recovered to adequately characterise the objects present with regard to their nature and significance.

*Enough information is defined by Heritage NSW as meaning "the sample of excavated material clearly and self-evidently demonstrates the deposit's nature and significance. This may include things like locally or regionally high object density: presence of rare or representative objects: presence of archaeological features: or locally or regionally significant deposits stratified or not." (DECCW 2010b).

Surface salvage

Surface salvage will be undertaken at Limondale 1 (47-5-0045), Limondale 9 (47-5-0046), and Limondale 11 (47-6-0833). This will involve a program of collecting all surface artefacts and include:

- GPS coordinate of each artefact
- Photographic record
- All cultural material will be collected, bagged and clearly labelled. They will be temporarily stored in the Biosis office for analysis (at 8 Tate Street, Wollongong, NSW)
- Following the salvage of each Aboriginal site, an Aboriginal Site Impact Recording Form (ASIRF) will be prepared and submitted to AHIMS.

5.2.8 Strategy 8: Long term management of Aboriginal heritage items

Consultation with the Aboriginal stakeholders for a Care and Control agreement will be conducted following the RAPs' review of the Limondale sun farming project HMP.

The following long term management strategy has been developed in consultation with RAPs and in accordance with Requirement 26 of the Code. These will be included in the Care and Control Agreement.

The surface salvage of Limondale 1 (47-5-0045), Limondale 9 (47-5-0046), and Limondale 11 (47-6-0833) will take place under the supervision of nominated RAPs.

Documentation of all materials in accordance with Requirement 26 – Stone artefact disposition and storage within the Code.

Following the salvage methodology outlined in section 5.2.7 above, all Aboriginal heritage items and materials will be temporarily stored in a secure location within Biosis's Wollongong office (8 Tate Street, Wollongong, NSW).

Following the salvage of each Aboriginal site, an Aboriginal Site Impact Recording Form (ASIRF) will be prepared and submitted to AHIMS.

Upon advice from Limondale Sun Farming that construction works at the site are complete, all Aboriginal heritage items and materials will be repatriated to the site and reburied under RAP supervision.

5.2.9 Strategy 9: Ongoing consultation with Aboriginal stakeholders

Consultation with Aboriginal stakeholders will be continued throughout the life of this project, including when works are implemented and completed.

5.2.10 Strategy 10: Monitoring and reporting

A program to monitor and report on the effectiveness of the measures and any heritage impacts will consist of reassessing the above listed strategies following the completion of works.

Upon completion of the works, a short report will be prepared, documenting:

- The effectiveness of the HMP measures
- A list of sites salvaged, harmed and relocated
- Confirmation the ASIRFs have been completed and submitted to AHIMS
- A copy of the ASIRFs.

A copy of the report will be provided to Aboriginal stakeholders for the project and Heritage NSW by email to heritagemailbox@environment.nsw.gov.au.

6 Compliance management

6.1 Roles and responsibilities

The roles and responsibilities for implementation of environmental management are detailed in the Environmental Management Strategy (EMS). The Project Managements (see Table 7) are responsible for implementation for the HMP, including undertaking all consultation with key stakeholders.

The RWE Project Manager is responsible for ensuring all activities in this manual are carried out for the duration of the Limondale Sun Farm project, along with reporting any incidents to Heritage NSW.

The construction contractor must comply with the activities outlined in this manual and any deviation to activities outlined in this manual must be reported to the DPIW Project Manager.

Table 7 Roles and responsibilities and contact details

Site	Role / Position	Contact details
Limondale BESS	Site Supervisor	1800 844 007
Limondale BESS	Environment & Community Manager	1800 844 007

6.2 Record keeping

The following records must be kept by the archaeologist, construction contractor and the RWE Project Manager:

- Photographs of the sites listed in Table 2, prior and post construction.
- Any archaeological salvage of cultural material prior to and during construction.
- Any breaches of the AHIP conditions and the incident report provided to Heritage NSW.

6.3 Complaints handling

The RWE Renewables Australia Community and Stakeholder Engagement Framework is available on the Limondale BESS website (https://au.rwe.com/projects/limondale-bess/) and provides a 24 hour contact number 1800 844 007 and an email contact.

The Site Manager will respond to community complaints relating to incidents or issues. All complaints received will be documented in a Complaints Register, which will record the nature of the complaint, any corrective/mitigative actions undertaken in response, and response times. All complaints will be responded to within 24 hours.

The following details will be recorded:

- Date and time of the complaint.
- Method by which the complaint was made.
- Personal details of the complainant (if provided).
- Nature of the complaint.

- Action taken in relation to the complaint.
- Follow-up actions required.

All complaints will be investigated by the Environment and Community Manager (ECM), who will also be responsible for:

- Ensuring adequate mitigative actions are implemented to prevent reoccurrence.
- Liaising and following up with complaints.
- Review of the complaints register to monitor the effectiveness of mitigiation measures and identify any recurring themes of complaints that indicate a need to amend management approach.

The complaints procedure and contact details for the public to make complaints will be included on the project website and provided to Balranald Shire Council. Contact methods will include a phone number and email address.

6.4 Incident and non-compliance management

The Site Manager and Environmental Community Manager will be notified immediately of all incidents and non-compliance. In the case of an incident, vehicles and equipment will not be moved and/or removed from the scene until the incident has been investigated.

In addition to the above process, incidents and near misses and non-compliances will be investigated and documented in accordance with the Limondale Solar Farm Environmental Management Strategy to:

- Establish root cause and identify contributing factors.
- Identify preventative and corrective actions to be implemented to prevent reoccurrence.
- Share learnings amongst the project team and other stakeholders as appropriate.

For incidents, and in accordance with the CoA Schedule 4, Condition 3, Limondale will:

- Immediately notify the Secretary and any other relevant agencies of any incident on site or related to site vehicles.
- The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident.
- Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix A of the EMS.

As part of incident investigation, corrective and preventative actions will be identified, assigned to an appropriate person and closed out according to set timeframes. Corrective actions will include reference to the relevant incident report to track closeout.

As part of a non-compliance review, the notification will be in accordance with CoA Schedule 4, Condition 4A, Limondale will:

- Notify the Planning Secretary in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.

The notification must:

- Identify the development and the application number.
- Set out the condition of consent that the development is non-compliant with.

- The way in which it does not comply.
- The reasns for the non-compliance (if known) and
- What actions have been, or will be undertaken to address the non-compliance.

A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

If an incident occurs that results in actual or potential impacts on known heritage items and/or archaeological items that are discovered unexpectedly, Heritage NSW will be informed immediately.

The report to Heritage NSW should also be sent to the RWE Project Manager and the archaeologist and include the following information:

- Any contravention to the strategies outlined in the HMP
- The nature of the incident
- The actual or likely impact of the incident on Aboriginal objects and/or Aboriginal places
- The nature and location of the Aboriginal objects and/or places, referring to and providing maps and photos where appropriate
- The measures which have been taken or will be taken to prevent a recurrence of the incident.

6.5 Reporting

Reporting requirements and responsibilities of heritage related issues should be documented as outlined in Table 7 below:

Table 8 Reporting roles and responsibilities

Action	Responsibility
A short summary of the report	Archaeologist
Describe any ongoing consultation with or involvement of RAPs	Project Manager/Archaeologist
Provide details of the Aboriginal objects which were fully or partially harmed in the course of undertaking the construction	Construction contractor/Project Manager/Archaeologist
Detail any community collection of Aboriginal objects undertaken by the RAPs	Archaeologist
Comment on the effectiveness of any mitigation measures that were implemented	Construction contractor
Comment on the effectiveness of any mitigation plan which was in place	Construction contractor
If any Aboriginal objects were moved to a temporary storage location, a description of the nature and types of Aboriginal objects which are now at that location	Archaeologist
Detail the results of any analysis of Aboriginal objects	Archaeologist
Detail the long term management arrangements for any Aboriginal objects	Archaeologist

7 Training and Awareness

The construction contractor must comply with all RWE WHS manuals and procedures.

Prior to the commencement of construction, the construction contractor must undertake a cultural heritage induction which will include the following:

- A description of Aboriginal cultural heritage in Australia
- A description of Aboriginal cultural heritage in the south-west region
- A description of the tangible and intangible aspects of Aboriginal heritage and why it is important
- An overview of the *National Parks and Wildlife Act 1974* and the *Heritage Act 1977* and the implications and fines applicable for breaching the Acts
- A general overview of cultural heritage site types
- The process for reporting unknown cultural heritage sites
- The process for reporting damage to cultural sites
- The process for reporting human remains

In addition to the above, Biosis will provide an overview of each recorded Aboriginal heritage site which has been identified on the Limondale Sun Farming Project. This will include:

- The site boundaries and how they have been marked
- The content of the site
- Whether any salvage works have taken place.

8 Review and continuous improvement

During construction, operation and decommissioning, the HMP will be reviewed internally every six months:

- Assess the continuing suitably of the HMP in relation to construction progress, changing conditions and information.
- Incorporate feedback from external stakeholders, including the general community.

Regular review of the HMP will allow opportunities for improvement to be identified and implemented, achieving the overall aim of continual improvement.

Where the review process identified material changes to HMP, relevant stakeholders will be consulted regarding the change. Following consultation and incorporation of mutually agreed changes, the HMP will be resubmitted to DPHI for approval where material changes are required.

Prior to upgrading or decommissioning activities, this plan will be reviewed and updated as required. Where material changes are required as a result of upgrading or decommissioning activities, and following consultation and incorporation of mutually agreed changes, the HMP will be resubmitted to DPHI for approval.

The HMP will also be reviewed and where necessary revised, as per the above process, within one (1) month of the:

- Submission of an incident report, or
- Any modification to the conditions of consent.

8.1 HMP update and amendment

This will occur as needed. A copy of the updated HMP and changes will be distributed to all relevant stakeholders in accordance with the approved document control procedure. The HMP will also be updated and resubmitted for approval in the event a previously unidentified heritage items is found.

Appendix A: Identifying Aboriginal objects and site types

Isolated stone artefact

Stone artefact scatter

Shell midden

Stone quarry

Hearth

Modified tree

Earth mound

Burial

Waterhole

Aboriginal gathering and resource location

Appendix B: Aboriginal consultation

Upon approval of the Limondale sun farming project HMP, the Aboriginal stakeholders will be sent a copy of the HMP for comment. Following comments, Appendix B will be completed.

Appendix C: Chance/Unexpected Finds Protocol

In the event that unexpected Aboriginal objects or sites are located, an assessment will need to be made as to the significance of the object. Appendix A contains guidelines around the identification of Aboriginal objects. The *National Parks and Wildlife Act 1974* defines an Aboriginal object as:

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

The following process should be followed with respect to unexpected finds:

- Should any Aboriginal objects be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist.
- The archaeologist will investigate and assess the Aboriginal object to determine the nature, extent and significance of the find. This will enable recommendations to be provided on how work can proceed and whether any further work is required. The archaeologist must supply written advice to the Project Manager within 24 hours stating:
  - Determination of whether the find is an Aboriginal object
  - Advice on whether how the project is to proceed and whether the establishment of any no-go areas is necessary
  - Recommendation on further works that may be required and timeframe for completion of these works.
- NSW Heritage and Aboriginal stakeholders will be notified. This will include a statement concerning the find, management measures implemented and notification of any further works arising. Aboriginal stakeholders are to be involved in any further assessments or works as required.
- AHIMS site cards will be prepared for each new site identified and submitted to AHIMS

Should any Aboriginal objects be identified, this will trigger a review of this HMP in accordance with Section 7

Appendix D: Heritage Management Plan Update – Unexpected finds

Heritage Management Plan Update

Unexpected finds: Aboriginal ancestral remains at Limondale Sun Farm

Prepared for Limondale Sun Farm Pty Ltd (Belectric)
October 2020

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Heritage Management Plan Update

Unexpected finds: Aboriginal ancestral remains at Limondale Sun Farm

Report Number

J190764 RP#6

Client

Limondale Sun Farm Pty Ltd (Belectric)

Date

26 October 2020

Version

v1 Final

Prepared by

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26 October 2020

Approved by

Pamela Kottaras
Associate, National Technical Lead - Historic Heritage
26 October 2020

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1 Introduction

1.1 Overview

This is an addendum to the *Limondale sun farming project, NSW: Heritage Management Plan* (HMP) (Biosis 2017), and has been prepared to manage the discovery of Aboriginal ancestral remains during construction of the Limondale Sun Farm (the project), located on the Yanga Way approximately 15 km south of Balranald, NSW.

This addendum addresses the requirements outlined in Section 5.2.6 of the HMP, which states that where the identification of human remains is found, a review will be triggered in accordance with Section 8 of the HMP. The aim of the review being to improve the management of environmental performance during the life of the solar farm. It should be read in conjunction with the 2017 version, as it updates the specific issue of the burial and associated finds.

The key objective of this report is to address the steps taken since the discovery of Aboriginal ancestral remains on site, the measures imposed to avoid impacts to the finds while works continued, and outlining methods for the long-term conservation of the site into the future while ensuring the ability for the solar farm to continue its operation. A draft copy of the addendum has been provided to the project's Registered Aboriginal Parties (RAPs) as well as the Department of Planning Infrastructure and Environment (DPIE) (John Gilding) for review and comment prior to finalisation.

The legislation and guidelines relevant to this addendum can be found in the Section 2.1 of the HMP.

1.2 Description of finds

EMM Consulting Pty Ltd (EMM) was engaged by Belectric Australia Pty Limited (Belectric) to assist in the identification and management of Aboriginal ancestral remains that were discovered within Solar Block 84 (Block 84) during construction of the Limondale Sun Farm on 7 January 2020. The skeletal fragments were exposed by development activities (possibly aided by wind erosion) on an aeolian sand dune within the solar farm during the construction phase of the project.

Through subsequent investigations it was determined that the skeletal fragments were human and likely to be Aboriginal ancestral remains. Archaeologist John Gilding (DPIE) was the human skeletal expert on site and provided the information related to the bones and estimated date of the burial. It was determined that there are at least four locations in Block 84 with human skeletal material on the crest of the sand body, with two discrete concentrations on the crest, one on the mid slope and one at the base.

The focus of the finds was a fragmenting skeleton in a flexed position with the head to the west and the feet to the east. Two concentrations of teeth were noted, indicating that there may have been two burials location. The burial was estimated to be an adolescent, which is supported by the wear on the teeth and one just erupted third molar (wisdom tooth) visible in the mandible. The remains are approximately 5,000 to 10,000 years old estimated on the extent of mineralisation of the bones and the presence of a worked and partly ground stone implement (possibly quartzite), which has the appearance of belonging to the technology that developed during the late Holocene (<5,000 years ago to present). This estimate is based on a visual inspection only, and discussions with the Aboriginal community indicated that no further research into the remains was desirable.

In addition to the human bones, fragments of fresh-water mussel shells representing the floodplain mussel and the river mussel were found close to the head of the individual (west). The sand body containing the find also included probable hearths, clay heat retainers, stone artefacts and shell fragments in various places.

Photographs of the finds and their location within the landscape are provided in Appendix A.

1.2.1 Initial discovery and consultation (14 January 2020)

The discovery was made by an employee of Belectric, who notified the project manager. As set out in the HMP (Section 5.2.6) and required under the *Coroner's Act 2009,* NSW Police was informed of the find and asked to attend the site. Senior Constable Jason Noreen, of Balranald Police Station, attended the site and made a preliminary assessment that the remains were likely to be Aboriginal ancestral remains. Subsequently, SC Noreen photographed the skeleton and advised Belectric and EMM that NSW Police were not required further other than to lodge certificate to the Coroner. Following NSW Police's assessment, in accordance with the *National Parks and Wildlife Act 1979* (NPW Act), EMM initiated consultation with the project registered Aboriginal parties (RAPs) and the archaeologist John Gilding at DPIE to inform them of the find and to arrange a meeting on site to view the remains, and discuss their future management. The meeting was held on Tuesday 14 January 2020 on site, and was attended by members of EMM, Belectric, DPIE, and six RAPs. The meeting was held in the Belectric construction compound, as well as on site at the location of the ancestral remains.

The outcomes of the meeting affirmed that until further management measures of the burials are determined, the entirety of Block 84 would be temporarily delineated as an exclusion zone so no further impacts from the project were unlikely to occur. All parties agreed that the burial should be protected but the most appropriate methods to do this were undetermined, and ongoing consultation between Belectric, EMM, DPIE and the RAPs was necessary until a decision could be reached. It was agreed with the exclusion zone in place that works were able to continue acknowledging that the identification of any other cultural material would continue to be managed in accordance with the HMP.

A detailed copy of the meeting minutes is provided in Appendix B.

1.3 Subsequent site inspection with key stakeholders (13 – 14 February 2020)

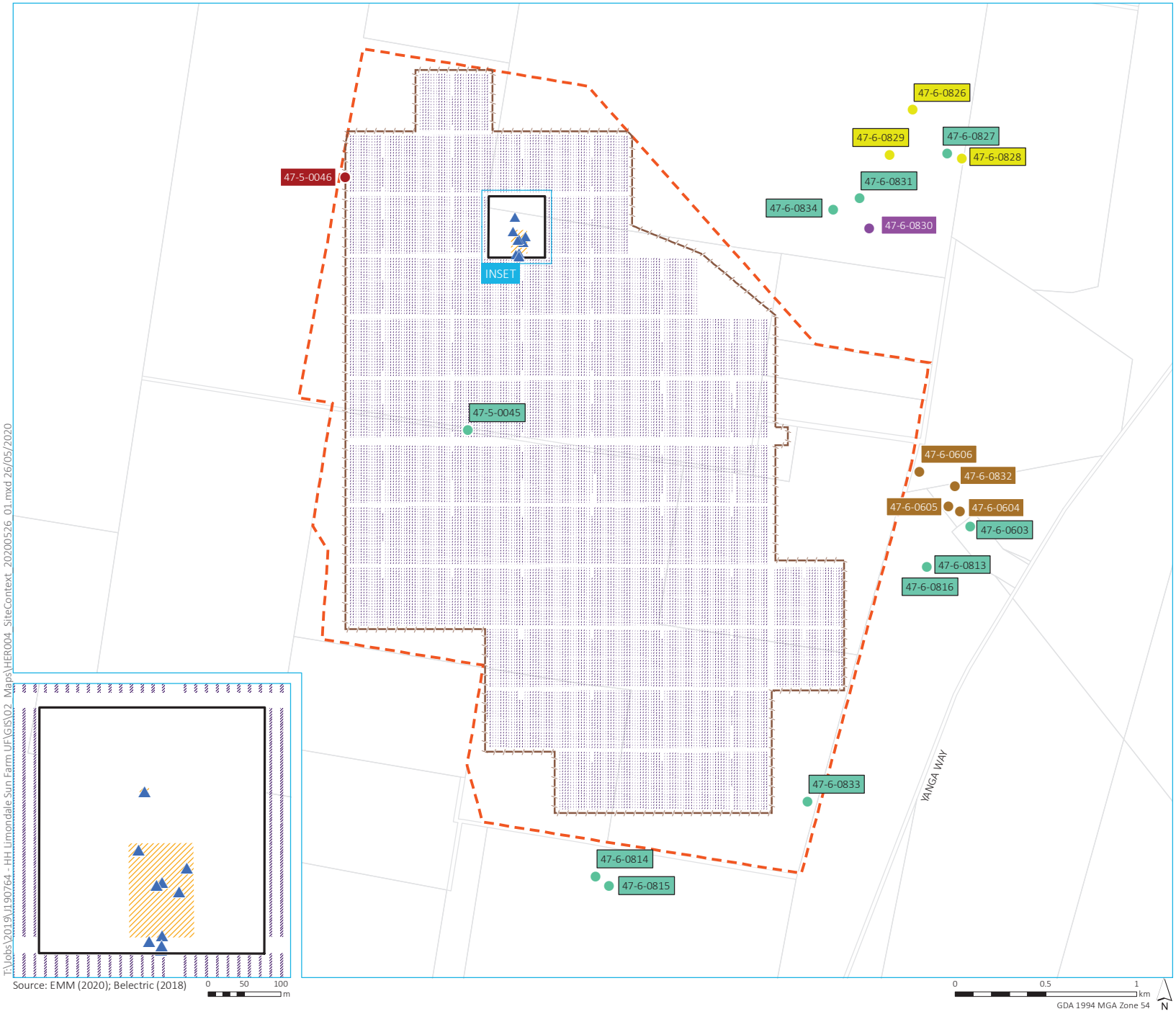
Following the discovery of the Aboriginal ancestral remains EMM continued to provide ongoing Aboriginal heritage advice to Belectric. A subsequent site inspection occurred from 13 – 14 February 2020 to provide further advice on the management of Blocks 84 and Block 85 further to the north along the sand dune crest (Figure 1.1). The aim of the works was to determine whether any parts of Block 84 and/or Block 85 would be available for future development given the discovery of human remains and the extension of the same landform – an aeolian sand dune – into these areas.

The site inspection was conducted by EMM and attended by key Aboriginal stakeholders; Balranald Local Aboriginal Land Council (LALC) (Neville Murray), Yitta Yitta/Nari Nari (Maria Edward), Mutthi Mutthi (Patsy Winch) and the Wadi Tribes (Caylan Lyon) traditional owners. The invitation was also extended to the Wakool Aboriginal Corporation but they were unable to attend the site inspection. The party conducted pedestrian traverses across the two blocks to identify any further cultural material. This included the investigation of the area along the eastern and western fringe of Block 84 – the central portion containing the human remains, currently forming an exclusion zone – and the entirety of Block 85, each block being some 900 m^2 in size.

The site inspection resulted in the identification of two further isolated Aboriginal finds within Block 84, consisting of an isolated glass artefact, and a greenstone artefact adjacent to a small number of highly fragmented bones (n=4). While the bone was unidentifiable to species, given the proximity to other human remains, it was left untouched, and the exclusion zone was expanded another ~40 m to the northern edge of Block 84 to ensure its protection. No cultural material was identified within Block 85.

Based on the findings of the site inspection, it was recommended that any development activities taking place within Blocks 84 and 85 be monitored by an archaeologist and/or a RAP. Discussions on site with Belectric personnel and RAPs remained inconclusive of the size required for the heritage exclusion zone and the methods of reburial for the previously discovered human remains.

A copy of the letter report documenting the finds and management recommendations is provided in Appendix C.



Site context

Limondale Sun Farm
Heritage management plan
Figure 1.1

EMM
creating opportunities

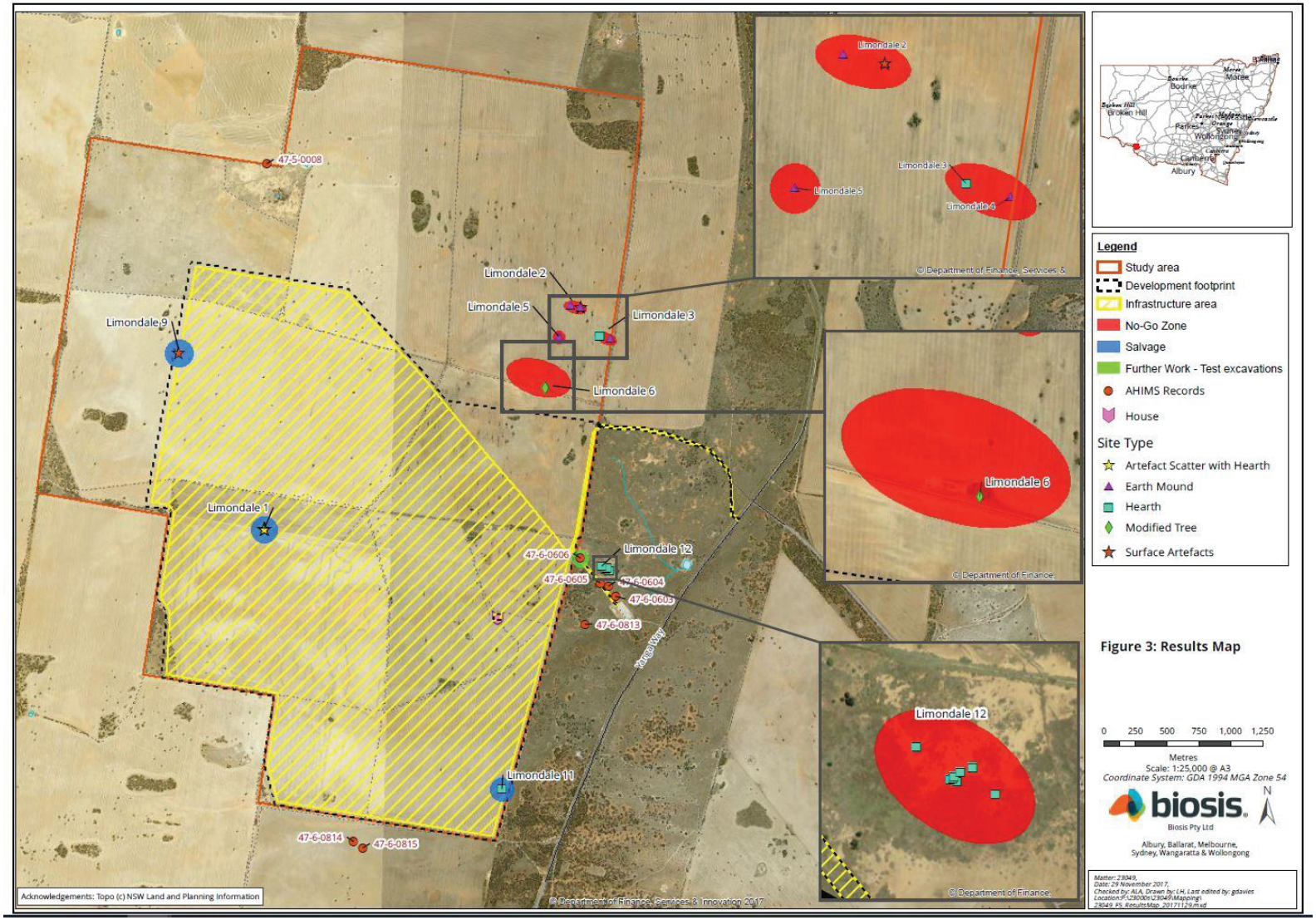


Plate 1.1 Figure 3 Biosis (2017)

1.4 Monitoring works and discovery of additional remains (2 – 13 March 2020)

Since this discovery, all further activities proposed in the vicinity of Block 84 or nearby (~400 m radius), were subject to archaeological monitoring by EMM personnel and/or representatives of the Aboriginal community. Monitoring of earthworks and the removal of pallets containing solar panels from Block 84 was monitored by an EMM archaeologist (Taylar Reid) and Neville and Shane Murray of the Balranald LALC from 2 – 13 March 2020.

The monitoring activities resulted in the identification of further Aboriginal ancestral remains within Block 84 and an additional four isolated Aboriginal objects within Blocks 84 and 85. The isolated objects consisted of a grinding plate fragment (Block 85), a small bone fragment (Block 85), a stone flake (Block 84) and small pieces of mussel shell (Block 84).

The Aboriginal ancestral remains were discovered on 2 March 2020 on the east-west access track that traverses the southern margin of Block 84 during the monitoring works for the removal of pallets containing the solar panels that were no longer required. The additional human remains were found in the vicinity of the previously recorded human remains (refer Figure 1.1) and as such were already situated within the exclusion zone curtilage. It must be noted that some of the bones were highly fragmented and could not be positively identified. However, given their proximity to other finds of human remains, they were treated as such (with the support of Belectric). The additional skeletal remains were flagged with stakes and high visibility flagger tape to avoid inadvertent impacts into the future, while management of the re-burial and/or relocation of these remains is discussed.

Upon discovery the Balranald Police Station and John Gilding (DPIE) were notified, and Senior Constable Jason Noreen attended the site to conduct a preliminary assessment. During discussions it was agreed that the remains were likely to represent Aboriginal ancestral remains, and the finds were subsequently managed in accordance with previous discoveries of human remains. Specifically, they were fenced off within an exclusion zone, pending further discussion of their management with the Aboriginal community, and DPIE were required.

A copy of the letter report documenting the finds and management recommendations is provided in Appendix D.

1.5 Fencepost excavation and relocation of small bone fragments (24 June 2020)

As a result of the need to protect the Aboriginal ancestral remains from further damage and to prevent the loss of the small bone fragments scattered south of the exclusion zone boundary, two areas were fenced off. The fenceposts were excavated, and small bones were relocated on 24 June 2020 with Taylar Reid, Patsy Winch and Terry Devereaux. An account of the activities are included in Appendix F.

2 Management of the burial

2.1 Considerations

Several considerations arose in relation to the excision of Block 84 from the development and the need for long term heritage conservation.

These issues were all related to the conservation of the Aboriginal ancestral remains and Block 84 in general:

1. Protection of the burial from inadvertent impacts (Section 2.2).
2. Moving a small collection of bone fragments and stone artefacts that are likely to be human into long term conservation areas (Section 2.3).
3. Regeneration of dune vegetation to stabilise the dune and recover the burial (Section 2.4).

2.2 Long term protection of the burial from inadvertent impacts

To ensure long term heritage conservation of the site, a post and wire fence will be installed to demarcate the exclusion zone by creating a visual barrier with signage to exclude unauthorised access by vehicles or individuals. The proposed activities would involve installing a 50 mm upright post into the ground and stringing wire from post to post, creating a fence. The fence coordinates are provided in Table 2.1.

Table 2.1 Limondale burial zone fencing coordinates

Northern area		**Southern area**	
EASTING	NORTHING	EASTING	NORTHING
728495.23993	6150746.54206	728479.95843	6150670.80327
728508.04682	6150746.60190	728569.56079	6150671.05426
728508.09643	6150735.98526	728570.27956	6150541.04023
728495.28954	6150735.92542	728480.67721	6150540.78924

Archaeological monitoring for the purposes of removing recently installed infrastructure has occurred inside the exclusion zone, the results of which have demonstrated that more recent loose mobile dune sand overlies an older, consolidated dune core sand. This older core is considered likely culturally sterile based on visual observations and monitoring.

Installing fence posts into the lower and older dune is considered a feasible approach since there is no evidence to suggest that cultural material will be harmed through the action of digging post holes. However, installing fence posts into the softer, overlying sand may elevate the risk of inadvertent impacts to other Aboriginal ancestral remains that may exist, unseen, within the dune. For this reason, an archaeologist and at least one RAP will be required to monitor any digging activity for the fence post installation.

The following instructions apply for the proposed fence post installation:

- the location of the proposed fence post will be manually excavated to the required depths (the hard dune core) under supervision of an archaeologist and/or Aboriginal stakeholder;
- any cultural materials (excluding human remains) will be collected in compliance with Section 5 of the HMP. Where human remains are observed, works would stop and the necessary steps as per the HMP would be implemented; and
- intact features such as hearths would be archaeologically excavated unless the fence post can be moved.

If bone fragments are found on the boundary of the exclusion zone, they will be fully recorded (photographed, text description, coordinates) and moved into the exclusion zone to ensure they remain unaffected. Movement would be <5m from the original location and will also be recorded. If the bones represent a complete or almost complete burial with articulated skeletal material, the burial will be recorded, and a new curtilage will be established. The new find will be reported to all RAPs and DPIE and will be included in the existing site card.

It is proposed that the cultural heritage exclusion zone could provide a safe location for the repatriation of all cultural material collected during the test excavation and surface collection activities since the inception of the project. The location of the relocated artefacts would be recorded, and a site card submitted to the Aboriginal Heritage Information Management System (AHIMS) database.

2.3 Relocation of disarticulated-human skeletal fragments into the exclusion zone

The small fragments of bone recorded at the southern extent of the exclusion zone, close to the southern boundary of Block 84 (refer Figure 1.1) are not in situ and have very likely moved down the slope as a result of the construction activities (as well as natural processes). Two isolated Aboriginal objects were also recorded in the area; however, they were collected in accordance with the HMP. The skeletal fragments are currently in an area required for vehicular access to the northern row of solar panels within Block 83, which will require ongoing maintenance and monitoring during the life of the solar farm. Given the location is in a high activity area, even with fencing, it is considered potentially at risk in future years from inadvertent impact and/or disturbance.

As such, it is proposed to collect these skeletal fragments and relocate them to the exclusion zone to allow site vehicles safe access to the track while preventing any harm to come to the fragments.

The details will be discussed and decided with the RAPs and a record of the new location of the bones will be made and kept by Belectric. The original location of the bones have previously been recorded (see Appendix A) and the existing site card will be updated with the new location.

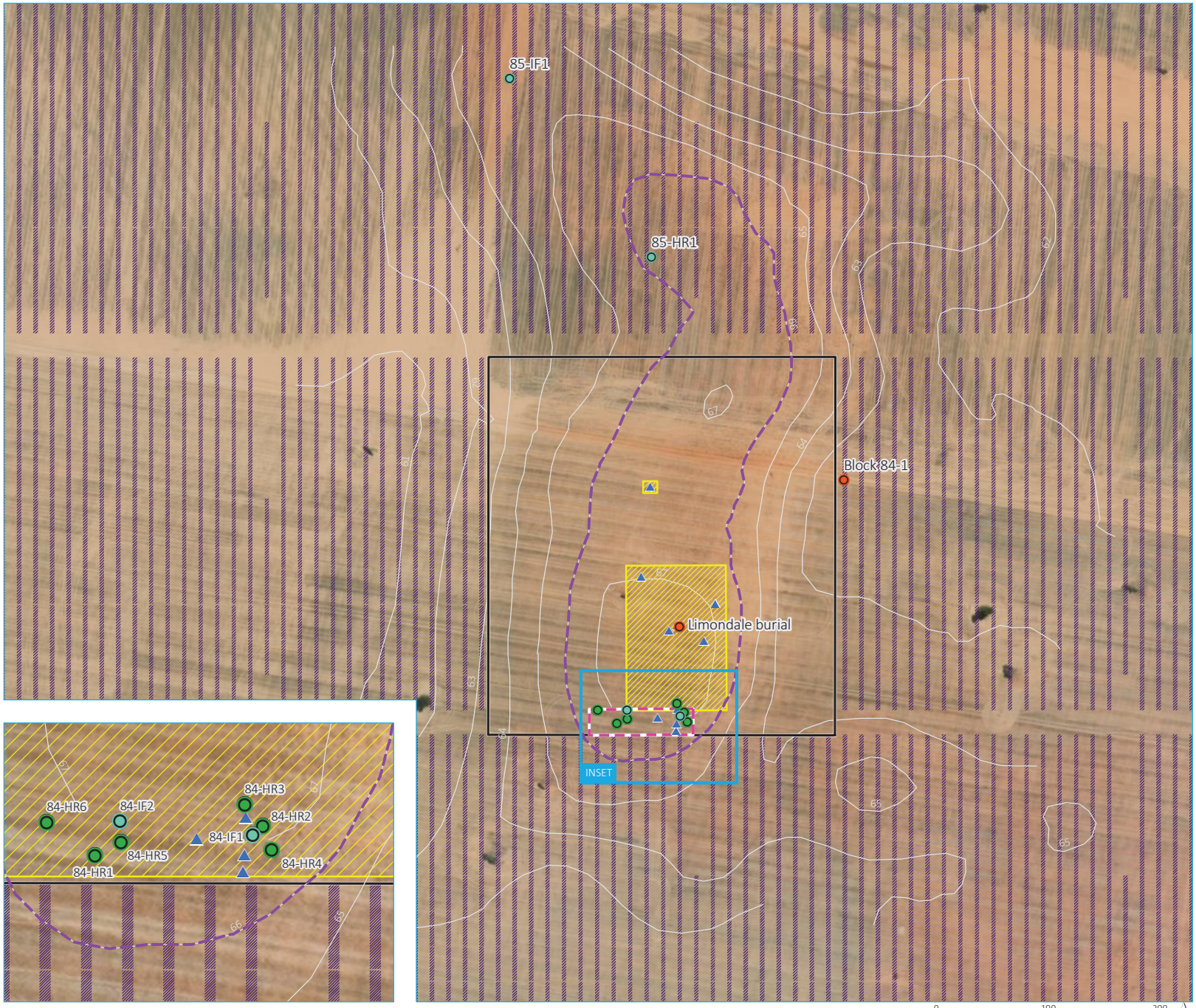
2.4 Revegetation to stabilise the dune and rebury the remains

Revegetation of the sand dune with native, endemic species within Block 84 is a desired outcome as it will stabilise the dune, protect the known Aboriginal ancestral remains, other undiscovered burials that may exist within the dune, and other non-skeletal Aboriginal heritage sites. The decision to leave the dune undeveloped and to revegetate will preserve this area, which has been identified as an archaeologically and culturally sensitive landscape.

Advice was sought from EMM's ecology team on the vegetation type that would be most suited for revegetation. A combination of shrub and ground layer species associated with sandplain mallee vegetation (PCT170) and linear dune mallee vegetation (PCT171). The list of suitable species is attached in Appendix E.

The details of the revegetation program will be decided with the RAPs. It is proposed to plant grasses and ground cover around the burial to capture sand and rebury the skeleton. The dune should be planted with a sparse covering of the groundcover and the shrubs to allow a gradual and natural regeneration. The replanting process does not need to be exhaustive but enough to allow sand to be trapped and stabilised around the burial, and to provide other endemic species to be establish themselves over the coming years.

Weeds should be manually removed. Chemicals and/or mechanical slashing is not permissible.



KEY

- Development footprint (see inset)
- Area to be excised from project
- Burial exclusion zone (May 2020 update)
- Proposed relocation to exclusion zone
- Solar panel layout
- Contour (1 m)
- Dune crest (archaeologically sensitive)
- Previously idenified human remains
- Aboriginal artefact
- Additional human remains
- Artefact collected under ACHMP

Source: EMM (2020); Belectric (2018)

Proposed exclusion zone

Limondale Sun Farm
Heritage management plan
Figure 2.1

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3 Revised strategies

The following supersedes the HMP following the events outlined in Section 1 of this addendum. Specifically, Section 3.2 below replaces Section 5.2.4 of the HMP and Section 3.1 replaces Section 5.2.6 of the HMP.

3.1 Strategy 6: Procedure to follow in the event of the discovery of human remains

In the event that known or suspected human skeletal remains are encountered during the activity, adhere to the following procedure presented in Table 3.1.

Table 3.1 Procedure for the discovery of potential Aboriginal ancestral remains

Stage	Actions
1.Stop work and secure site	• The immediate vicinity will be secured to protect the find and the find will be immediately reported to the work supervisor who will immediately advise the site supervisor or other nominated senior staff member. • A no-go zone will be established around the immediate area of the site. • Complete review of activities to enable compliance and continued operations.
2.Notification to authorities and stakeholders (see Table 3.3)	• The environmental manager or other nominated senior staff member will notify: – Police and State Coroner on the same day as the find; – Environment Line (131 555); – Engage suitably qualified archaeologist or forensic anthropologist to assist Police in monitoring of skeletal material.
3.Determination of the find and further notification	• If it is determined that the skeletal material is of ancestral Aboriginal remains, RAPs will be contacted and consultative arrangements will be made to discuss ongoing care of the remains. • Engage project archaeologist to assist and/or facilitate management of the Aboriginal ancestral remains with RAPs and Belectric.
	• If the skeletal material is not human, resume work. Ensure determination of non-human material is provided by relevant experts (eg Coroner or Police) before resuming work.
	• If the remains are historic but non-Aboriginal human remains, the NSW Heritage Council (or delegate of the Heritage Council) will be consulted to determine requirements in accordance with the NSW *Heritage Act 1977* and relevant guidelines. Further actions are likely to require adherence with the following NSW Heritage Council guidelines: – *Conservation Management Documents: Guidelines on Conservation Management Plans and other Management Documents.* – *Skeletal Remains; Guidelines for Management of Human Skeletal Remains*.
	• If the remains are non-Aboriginal and non-historic human remains, coordinate Belectric's involvement with police. Works will not proceed until written approval is granted from relevant authorities.

Table 3.1 Procedure for the discovery of potential Aboriginal ancestral remains

Stage	Actions
4.Initial planning and reporting if it is determined that the remains are Aboriginal ancestral remains.	• Aboriginal ancestral remains certificate to be submitted to the Police/Coroner to address the Coroners Act. • In consultation with RAPs and archaeologist, establish investigation area and any additional protocols to be adhered to during further investigation. The investigation will aim to establish whether any other burials are within or likely to occur nearby. Suitable methods could include controlled and monitored hand or machine excavation and/or non-invasive techniques such as geophysical techniques. • Engage an archaeologist to record the site and undertake significance and impact assessment of the burial site with RAPs and archaeologist. Site recordings must involve drawings and photography. Additional technical studies and samples may be taken with the consent of RAPs such as those for dating and biological information (eg age, sex and health of deceased). • Record burial site on the AHIMs register, noting any restricted access requirements requested by RAPs.
5.Engagement with construction and operation manager to determine whether disturbance of the burial site(s) can be avoided.	• If the Aboriginal ancestral remains cannot be avoided: – Consult with RAPs and project archaeologist to facilitate recovery and reburial protocols and actions. Recovery methods must include: ▪ Exhumation in a controlled archaeological method and in consultation with RAPs and placed into a secure, temperate controlled storage location until a final reburial site can it identified. ▪ Access to the secure storage location containing any human remains will be managed and facilitated by Belectric in consultation with RAPs. ▪ RAPs will determine if further studies, media releases or other investigations are appropriate for the finds. ▪ Where required, Belectric will help facilitate any culturally appropriate reburial or ceremonial methods. – Prepare report for DPIE and RAPs on the outcome of relevant investigation, recovery and reburial outcomes. – Update HMP. – Works will not recommence until written approval is received from relevant authorities. • If the Aboriginal ancestral remains can be avoided: – develop appropriate management and mitigation measures in consultation with RAPs and archaeologists; – prepare report for DPIE and RAPs; – update HMP; and – works will not recommence until written advice is provided from the project archaeologist that the remains are suitably protected and away from project impacts.

3.2 Strategy 8: Long term management of Aboriginal heritage items

Currently, the HMP only provides a temporary location for the cultural materials recovered and collected as part of the project. Following the completion of the construction works, it is proposed that the cultural materials is placed in the exclusion zone outlined in Section 2.3 and presented in Figure 2.1. The cultural material would be situated >5m from any in situ cultural materials (eg human remains) and would be buried in accordance with the *Code of Practise for the Archaeological Investigation of Aboriginal Objects in NSW* (DECCW, 2010).

The re-burial of cultural material would occur as soon as the construction activities are complete. The location of the re-buried material would be documented as a discrete 'site' on the AHIMS database.

3.3 Strategy 9: Ongoing consultation with Aboriginal stakeholders

Condition 20 of the approval (SSD 8025) stipulates that the HMP must be implemented following the Secretary's approval (Condition 20). Section 5.2.8 and Section 5.2.9 in the HMP require the long-term management of Aboriginal heritage items and the ongoing consultation with Aboriginal stakeholders, respectively. Thus, consultation is required with the RAPs and DPIE prior to commencing any of the proposed heritage management activities.

Table 3.2 lists the RAPs and their contact details for the purposes of ongoing consultation throughout the life of the solar farm. Table 3.3 lists the relevant authorities and their contact details should any additional human remains be found during the life of the solar farm.

The following ongoing consultation should be undertaken for the life of the solar farm:

- Every six months, written and/or verbal communication is undertaken with the RAPs to provide general context of the current project activities, and identify any expected changes in the forthcoming six months;
- Written and/or verbal communication is undertaken with the RAPs where any project activities are considered to deviate from established process within the HMP; and
- Written and/or verbal communication is undertaken with the RAPs where any project activities require access and/or may affect the exclusion zone as presented in Figure 2.1.

A consultation log of these activities will be kept by Belectic and appended to the HMP when updated.

Table 3.2 Registered Aboriginal Parties (RAPs)

Organisation	Name	Phone	Email
Balranald Local Aboriginal Lands Council	Damien Aidon (CEO)	0467 810 406	iscbu13@gmail.com
	Neville Murray (Chairman)	0498 645 472	
	Shane Murray	0422 713 863	
Yitta Yitta/Nari Nari	Smokey Murray	0467 539 304	anotherfive05@gmail.com
Nari Nari/Yitta Yitta	Maria Edwards	0448 925 027	withewaa@gmail.com
Wadi tribes	John Jackson (rep. family)	0427 927 675	John.Jackson@health.nsw.gov.au
Mutthi Mutthi	Patsy Winch	0406 693 628	pltwinch@hotmail.com
Wakool Aboriginal Corporation	Cynthia Pappin	0400 634 994	info@wakool.com.au
Pappin Family Corporation	Gary Pappin	0487 430 798	garyjpappin47@hotmail.com

Table 3.3 Relevant authorities to contact in the event of the discovery of human remains

Organisation	Name	Contact number	Email
Balranald Police Station	N/A	(03) 5020 1404	As provided on consultation
Heritage NSW Environment Line	John Gilding	(03) 5483-9118 131 555	John.gilding@environment.nsw.gov.au
Belectric	Tom Huber (HSE Manager) Ross Greenham	0447 143 526 0428 543 150	Thomas.huber@belectric.com ross.greenham@belectric.com

4 Evaluation and continual improvement

In accordance with Section 8 of the HMP there are ongoing opportunities during the life of the solar farm to improve upon the HMP and the addendum. These are live documents that will be updated as the project progresses and during the life of the solar farm upon its completion. This addendum is deliberately designed to focus on the current (May 2020) Aboriginal cultural heritage needs of the project since the discovery of Aboriginal ancestral remains on site. As such, its continuous improvement and update will be required throughout the life of the solar farm as required.

The purposes of this is to:

- improve upon the current heritage management strategy for the conservation of Aboriginal ancestral remains;
- identify any deficiencies within this addendum and apply corrective measures; and
- ensure continual engagement and consultation with the Aboriginal community should more Aboriginal heritage items be discovered during the life of the solar farm.

Where these criteria are not being met, the HMP will be updated. In addition, the effectiveness and applicability of the HMP will be discussed as required during the life of the solar farm. Where issues and/or modifications are identified with the HMP, it will be updated and redistributed to all key Aboriginal stakeholders for review and comment. A period of 14 days will be provided for comments before finalisation and implementation of the revised document.

In addition, an annual review of the HMP will be undertaken regardless of the above issues to ensure it remains valid, and that local personnel are familiar with the content of the document.

Appendix A

LB1 Site Card

Aboriginal Site Recording Form

Senior Heritage Information Officer, Heritage Division, Locked Bag 5020, NSW 2124

Office Use Only

Site number 51-5-0319

Date received / / Date entered into system / / Date catalogued / /

Entered by (I.D.)

Information access

☐ Gender/male ☐ Gender/female ☑ Location restriction ☑ General restriction ☐ No access

Office Use Only

For further information contact:

☑ **Nominated Trustee**

Title	Surname	First name	Initials
Ms	Kottaras	Pamela	PK

Organisation: EMM CONSULTING

Address: 20 CHANDOS ST 2065

Phone number: 0294939516 Fax:

Client on system ☐

☑ **Knowledge holder**

Title	Surname	First name	Initials
MR	SMOKEY	MURRAY	

Organisation: Yita Yita Nari Nari TAB

Address: 412 Belmore St, Hay 2711

Phone number: 0269932243 Fax:

Client on system ☐

Aboriginal Heritage Unit or Cultural Heritage Division Contacts

Geographic location

Site Name: LIMONDALE BURIAL 1

Easting: 728526 Northing: 6150619 AGD/GDA: GDA

Mapsheet:

Zone 55 Location method: Non-Differential GPS

Other registration:

Primary recorder

Title	Surname	First name	Initials
MR	DESIC	RYAN	RD

Organisation: EMM CONSULTING PTY LTD

Address: 20 CHANDOS STREET 2065

Phone number: 0294939500 Fax:

Date recorded: 13/01/20

Client on system ☐

Aboriginal site recording form - site information

Open/close site Open Site

Site context

Landform

- [ ] Mountainous
- [x] Plain
- [ ] Rolling hills
- [ ] Steep hills
- [ ] Undulating plain

Landform unit

- [ ] Beach
- [ ] Coastal rock platform
- [x] Dune
- [ ] Intertidal flat
- [ ] Lagoon
- [ ] Tidal creek
- [ ] Tidal flat
- [ ] Cliff
- [x] Crest
- [ ] Flat
- [ ] Lower slope
- [ ] Mid slope
- [ ] Upper slope
- [ ] Plain
- [ ] Ridge
- [ ] Tor
- [ ] Valley flat
- [ ] Levy
- [ ] Stream bank
- [ ] Stream channel
- [ ] Swamp
- [ ] Terrace
- [ ] Terrace flat

Slope

0 degrees

Vegetation

- [ ] Closed forest
- [ ] Grasslands
- [ ] Isolated clumps of trees
- [ ] Open forest
- [ ] Open woodland
- [ ] Scrub
- [ ] Woodland
- [x] Cleared
- [ ] Revegetated
- [ ] N/A

Land use

- [ ] Conservation
- [ ] Established urban
- [x] Farming-intensive
- [ ] Farming-low intensity
- [ ] Forestry
- [x] Industrial
- [ ] Mining
- [x] Pastoral/grazing
- [ ] Recreation
- [ ] Semi-rural
- [ ] Service corridor
- [ ] Transport corridor
- [ ] Urban expansion
- [ ] Residential

Water

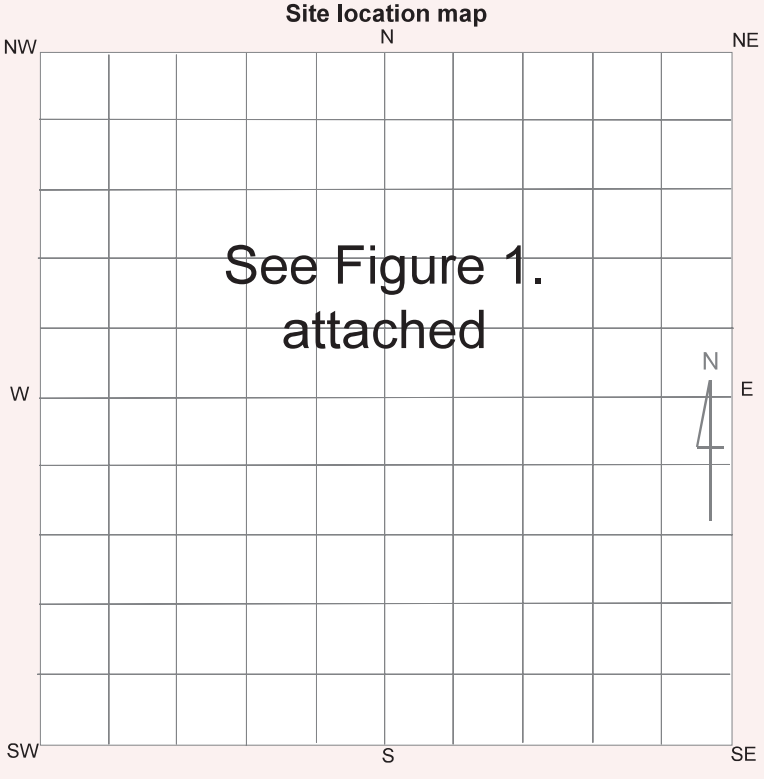
Distance to permanent water source	7500 metres
Distance to temporary water source	metres
Name of nearest permanent water source	Yanga Lake
Name of nearest temporary water	

Directions for relocation

The Limdondale sun farm is approx 15 km south of the town of Balranald.The nearest road is Yanga Way.

~~The sites are spread across approximately 100 m x 100 m~~ in Block 84 of the Limondale sun farm. The main skeletal find is located at Lat: -34.76101 Lon: 143.49684.

Site location map



Current land tenure

- [ ] Public — National park/government department
- [x] Private

Primary report **I.D.** (I.D. Office Use only)

Aboriginal site recording form - site information

General site information

Closed site

Shelter/cave formation

- [ ] Boulder
- [ ] Wind erosion
- [ ] Water erosion
- [ ] Rock collapse

Rock surface condition

- [ ] Boulder
- [ ] Sandstone platform
- [ ] Silica gloss
- [ ] Tessellated
- [ ] Weathered
- [ ] Other platform

Condition of Ceiling

- [ ] Boulder
- [ ] Sandstone platform
- [ ] Silica gloss
- [ ] Tessellated
- [ ] Weathered
- [ ] Other platform

Shelter Aspect

- [ ] North
- [ ] North East
- [ ] East
- [ ] South East
- [ ] South
- [ ] South West
- [ ] West
- [ ] North West

Open site

Site orientation

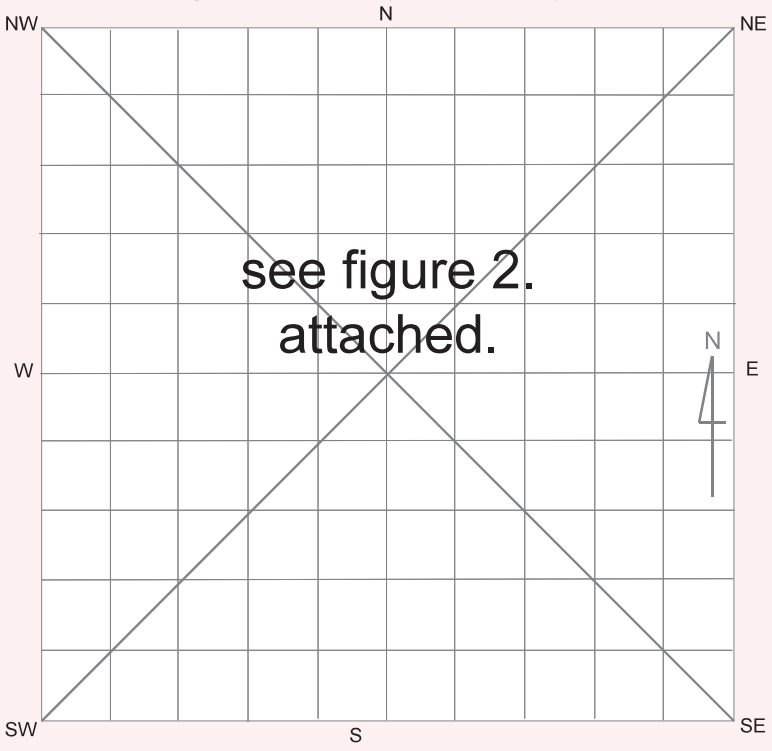
- [x] N-S
- [ ] NE-SW
- [ ] E-W
- [ ] SE-NW
- [ ] N/A

Features

- [ ] 1. Aboriginal ceremony and dreaming
- [ ] 2. Aboriginal resource and gathering
- [ ] 3. Art
- [x] 4. Artefact
- [x] 5. Burial
- [ ] 6. Ceremonial ring
- [ ] 7. Conflict
- [ ] 8. Earth mound
- [ ] 9. Fish trap
- [ ] 10. Grinding groove
- [ ] 11. Habitation structure
- [x] 12. Hearth
- [ ] 13. Non human bone & organic material
- [ ] 14. Ochre quarry
- [ ] 15. Potential archaeological deposit
- [ ] 16. Stone quarry
- [x] 17. Shell
- [ ] 18. Stone arrangement
- [ ] 19. Modified tree
- [ ] 20. Water hole

Site plan

Indicate scale, boundaries of site, features



Site dimensions

Closed site dimensions (m)

	Internal length
	Internal width
	Shelter height
	Shelter floor area

Open site dimensions (m)

200	Total length of visible site
60	Average width of visible site
14,000	Estimated area of visible site
300	Length of assessed site area

Aboriginal community interpretation and management recommendations

A consultation meeting was conducted with DPIE, Belectric, RAPS and EMM on the 14/1/20 at the Belectric compound and at the site location. Meeting attendees inspected the sites including the remains and determined that the burial is likely ancestral remains. This was a further confirmation of the findings by senior constable Noreen that the remains are >100 years in age.

Key management points from the meeting is that:
The burial be left in situ.
Excavation is not supported by RAPS
The area surrounding the burial be excised and a suitable barrier be placed to prevent entry.
Of key concern was the implementation of some form of erosion control - suggested that either native vegetation, geofabric or a pole structure be constructed to trap sand.

Preliminary site assessment

Site cultural and scientific analysis and preliminary management recommendations

Human remains are rare and significant finds in the archaeological record.
The site has high cultural and scientific implications for Aboriginal occupation.
Based on preliminary observations the remains date between 10ka-<5ka due to the presence of ground edge artefacts nearby and the mineralisation of the bones. Based on observations of the teeth the individual appears to be of adolescent age.
Due to the proximity of this site to other significant cultural sites such as Lake Mungo, it is considered of high significance.
The burial is associated with artefacts such including freshwater shells, burnt clay/potential hearths, flaked stone artefacts (silcrete) and a ground edge stone adjacent to the main skeletal remains. Extreme caution should be exercised when conducting works in or around sand bodies in the area.
Freshwater mussel species including Velesunio ambiguous (flood plain mussel); and Alathyria jacksoni (river mussel). The large majority of the shells were broken and scattered in small groups.

This section should only be filled in by the endorsees

Endorsed by: ☐ Knowledge holder ☐ Nominated trustee ☐ Native Title holder ☐ Community consensus

Title	Surname	First name	Initials

Organisation

Address

Phone number Fax

Attachments (No.)

- ☑ A4 location map
- ☐ B/W photographs
- ☐ Colour photographs
- ☐ Slides
- ☐ Aerial photographs
- ☑ Site plans, drawings
- ☐ Recording tables
- ☐ Other
- ☐ Feature inserts-No.

Comments

Maps and PDFs attached.
Within one week of assessment, the burial was being reburied naturally by sand and wind.

Feature recording form - artefact

Site I.D.

Site name: Limondale Sun Farm

First recorded date: 14/01/20

Importance: Contributes to primary site import

No. of instances

Recorded by: RD

	Yes	No
Stone artefacts only		No
Artefacts collected (A permit is required to collect artefacts)	Yes	

Percentage of non-stone artefacts to percentage of stone artefacts

0-9% | 10-19% | 20-29% | 30-39% | 40-49% | 50-59% | 60-69% | 70-79% | 80-89% | 90-100%

90-100%

Feature context and condition

Scatter No.: 3

Easting: 728529

Northing: 6150589

Density (Artefact count per square metre)

Dimensions: Length (m) | Width (m) | Depth (m)

	Yes	No
In situ	Yes	
Stratified		No

Feature condition

- [ ] Very good
- [ ] Good
- [ ] Poor

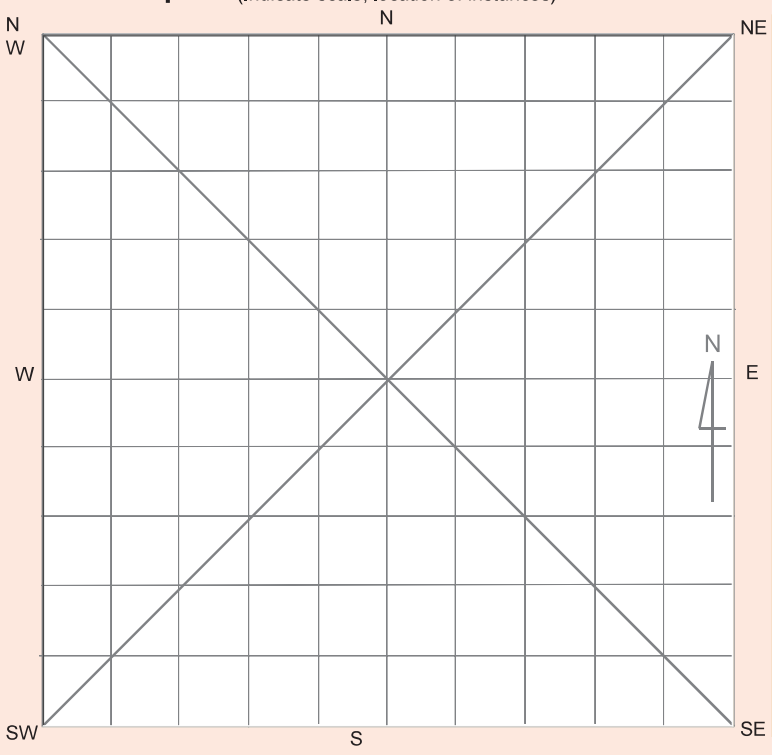
General condition

- [x] Weathered
- [ ] Vehicle damage
- [ ] Surface water wash
- [ ] Fire damage
- [ ] Erosion
- [ ] Stock damage
- [ ] Exposed archaeological material

Recommended action

- [ ] Boardwalk
- [x] Fencing
- [x] Closure to public
- [ ] Continued inspection
- [ ] Fire hazard reduction
- [ ] Expert assessment
- [ ] Meeting with land manager
- [x] Revegetation
- [ ] Signage
- [x] Soil erosion control
- [ ] Track closure/re-routing
- [ ] Additional recording

Feature plan (Indicate scale, location of instances)



Feature environment

(Complete when *feature* environment differs to *site* environment, use attributes from cover card, p. 2)

- Plains — Land form
- Sand dune — Land form unit
- 0 — Slope
- Spinifex grass — Vegetation
- Solar Farm — Land use

Water

Distance to permanent water source: 7500 metres

Distance to temporary water source: metres

Name of nearest permanent water source: Yanga Lake

Name of nearest temporary water:

Feature recording table - artefact

Stone artefact

Instance no.	Recording date	Artefact material	Artefact type	Platform surface	Platform type	Termination	Cross section	Length (mm)	Width (mm)	Thickness (mm)
		Basalt	Other	Ground						
		Silcrete	Flake					25	10	
		Sandstone	Milling slab	Ground						
		Silcrete	Flake							

Other artefact type

Instance no.	Recording date	Artefact material	Artefact type	Description	Length (mm)	Width (mm)	Thickness (mm)

Material

Basalt
Chert
Fine grained siliceous
Granite
Quartz
Quartzite
Sandstone
Silcrete
Green glass
Amber glass
Amethyst glass
Clear glass
Ceramic
Porcelain
Tin can
Wire
Nail
Button
Shell
Bone
Wood
Resin

Artefact description

Adze
Anvil
Axe
Backed blade
Blade
Core
Core tool
Cyclon
Distal fragment
Eloura
Flake
Flake tool
Flaked piece
Hammerstone
Manuport
Milling slab
Mortar
Muller
Nuclear tool
Pirri
Proximal fragment
Tula
Other diagnostic type
Modified
Unworked

Platform surface

Cortex
Flake scar
More than one flake scar
Faceted
Ground
Indeterminate
Bipolar

Platform type

Focal
Shattered
Indeterminate
Bipolar

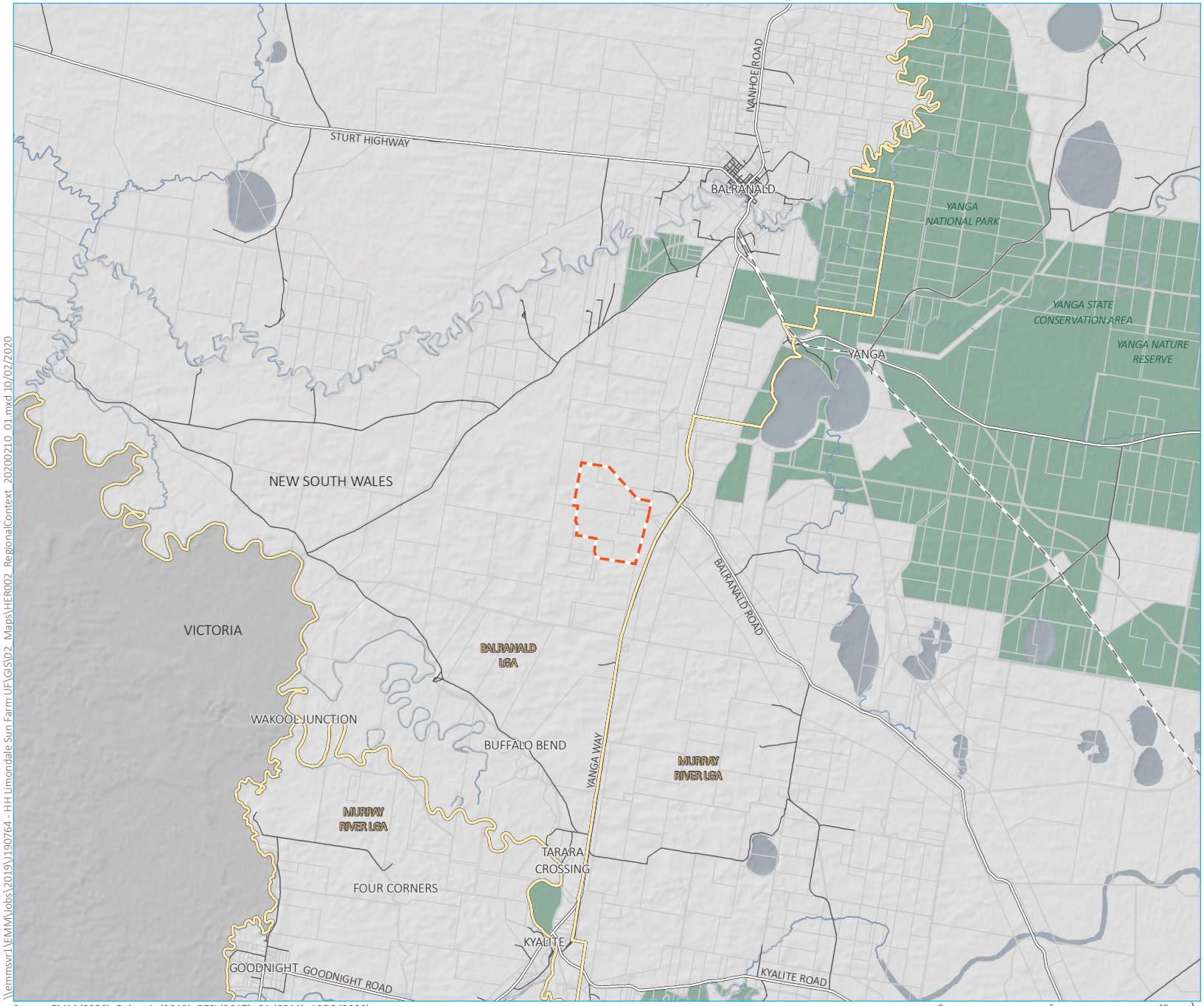
Termination

Feather
Hinge
Step
Outrepasse
Bipolar

Cross section

High/strong
High/weak
Low/weak
Irregular

Comments:



KEY

- Development footprint
- Rail line
- Major road
- Minor road
- Named watercourse
- Named waterbody
- Cadastral boundary
- NPWS reserve
- Local government area

\\emmsvr1\EMM\Jobs\2019\J190764 - HH Limondale Sun Farm UF\GIS\02_Maps\HER002_RegionalContext_20200210_01.mxd 10/02/2020

Source: EMM (2020); Belectric (2018); DFSI (2017); GA (2011); ASGC (2006)

0 5 10 km

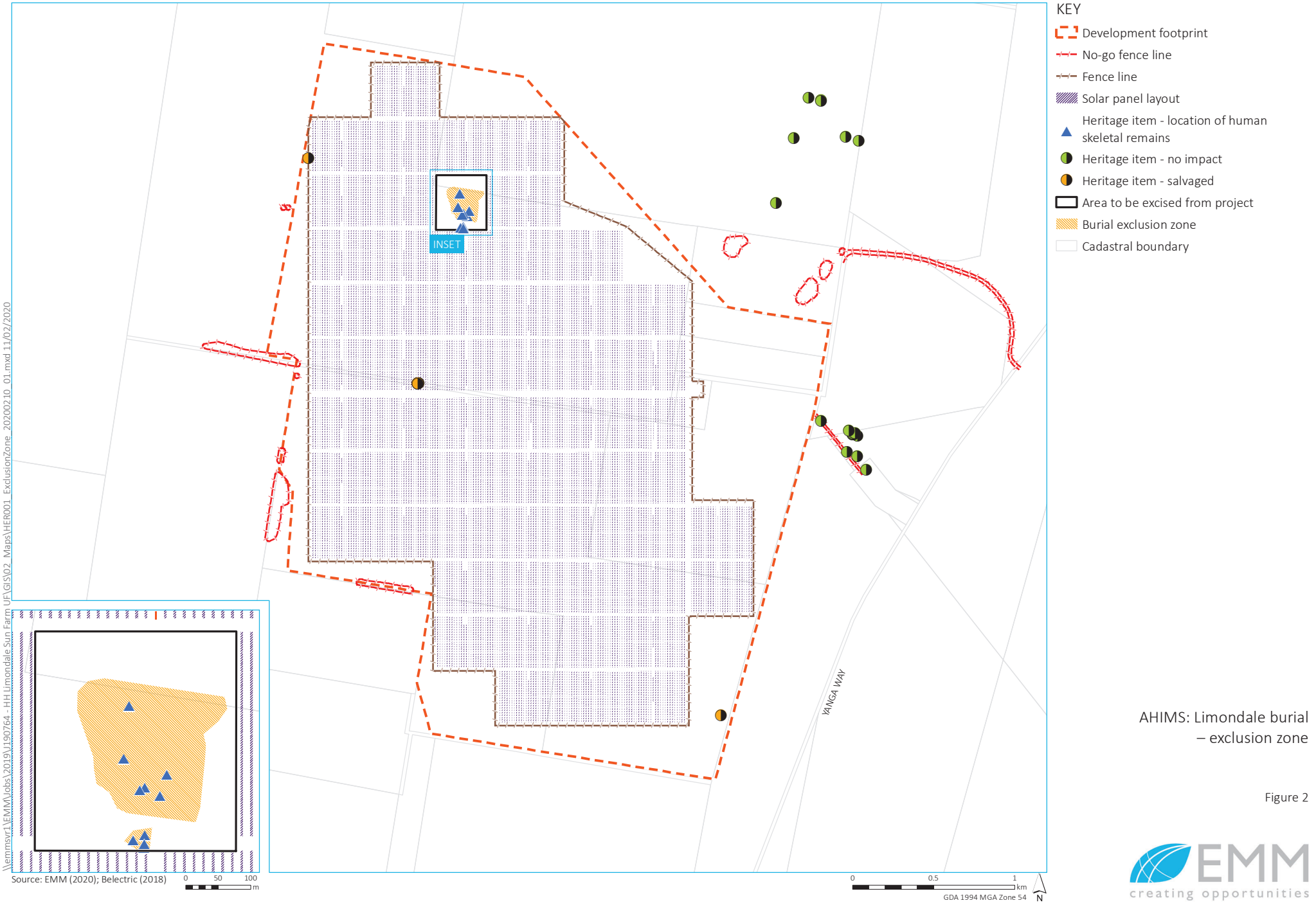
GDA 1994 MGA Zone 54

N

AHIMS: Limondale burial – regional context

Figure 1

EMM creating opportunities



AHIMS: Limondale burial – exclusion zone

Figure 2

EMM creating opportunities

REV.	DATE	DESCRIPTION
00	21/01/20	For issue

de Witt Consulting
planning surveying project management

CHARLESTOWN HEAD CFFICE
7 CANBERRA STREET
P.O. BOX 850, CHARLESTOWN, 2290
PHONE: (02) 4942 5441
FAX: (02) 4942 5301

PROJECT: LIMONDALE SOLAR FARM	SURVEY REF.	PROJECT No. 9217	SCALE 1:12000 @ A3		
TITLE: Finished Surface Levels	AZIMUTH MGA Ground	SURVEYED	SURVEY DATE		
	DATUM AHD	APPROVED CM	SHEET No. 1 of 3		
	CLIENT Downer	DRAWING No. 9217-GE-0080	REV. 00		

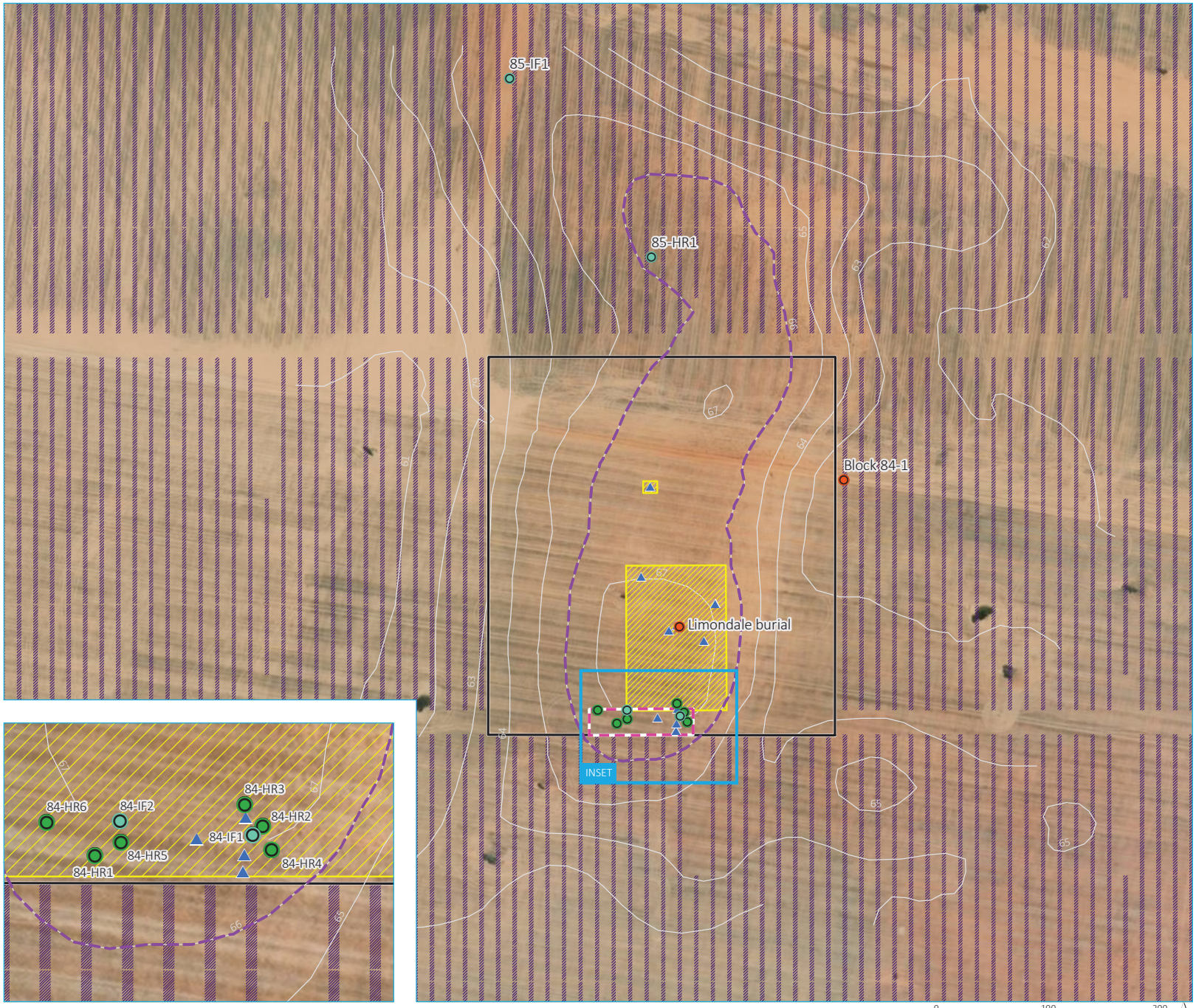
Description of Site: Limondale Burial 1

A sand dune landform was identified as part of the installation of a solar farm near Balranald, NSW. The sand dune was subject to partial excavation for the development, and during these works, human remains were identified. These findings led to a range of discussions and management extending between January and April 2020 that included: i) liaison with regulatory bodies and Aboriginal stakeholders on the management; and ii) ongoing monitoring of the nearby works to ensure no additional impacts to similar findings. These works identified that the sand dune, a transverse ridge, was some 500 m in length (north-south), and some 500 m (east-west). The upper crest of the landform has been truncated through the works by ~60 cm, and this is where many of the finds have been observed.

The main focus of the finds was a skeleton arranged and buried in a flexed position with the head to the west and the feet to the east (Refer to *Plate 1.1* for approx. location). Two concentrations of teeth were noted, indicating that there may have been two burials location. In addition to the human bones, a worked and partly ground stone implement was located close to the head of the individual (west) and fragments of freshwater mussel shells representing the floodplain mussel and the river mussel. The age of the burial could not be independently verified but was found in association with late Holocene (<5,000 years) stone artefactual material. The human remains were estimated to be an adolescent, on the basis of the wear on the teeth and one just erupted third molar (wisdom tooth) visible in the mandible. This estimate is based on a visual inspection only. Additional monitoring discovered seven Aboriginal skeletal fragments in the general vicinity of the first finds (primarily located within the Location A scatter in Plate 2.1) (refer Figure 1).

In addition to the human remains, a range of other cultural material have been found on the truncated and natural surface of the sand dune landform. These include hearths, clay heat retainers, stone artefacts and shell fragments (freshwater mussel) in various places. All cultural material had their location recorded with a GPS and any non-skeletal isolated finds were bagged and tagged in accordance with the project's Cultural Heritage Management Plan. They are currently being securely stored in the EMM Newcastle office alongside the artefacts salvaged by Biosis and project RAPs during the initial phase of the project, until they are reburied once the location and methods are agreed upon by the Aboriginal community.

On 24 June 2020, an exclusion zone with fencing was installed around the two areas containing Aboriginal ancestral remains to prevent any inadvertent impacts to the bones as sand will often obscure the remains. During this time a selection of several small bone fragments situated ex situ and spread across the access track, were collected and relocated to the tibia fragment, the closest large bone to the ex situ scatter (UTM 54 728526mE and 6150542mN). This was discussed and agreed upon with project RAPs and fieldwork was conducted with the assistance of Patsy Winch (Mutthi Mutthi).



KEY

- Development footprint (see inset)
- Area to be excised from project
- Burial exclusion zone (May 2020 update)
- Proposed relocation to exclusion zone
- Solar panel layout
- Contour (1 m)
- Dune crest (archaeologically sensitive)
- Previously idenified human remains
- Aboriginal artefact
- Additional human remains
- Artefact collected under ACHMP

Source: EMM (2020); Belectric (2018)

Proposed exclusion zone

Limondale Sun Farm
Heritage management plan
Figure 2.1

EMM
creating opportunities

Plate 1.1 Aerial view of Block 84 (boundary indicated in black) showing extent of the dune crest landform. Also indicated in blue is the location of the main fragmented skeleton. View North.

1. Location and description of remains and artefacts

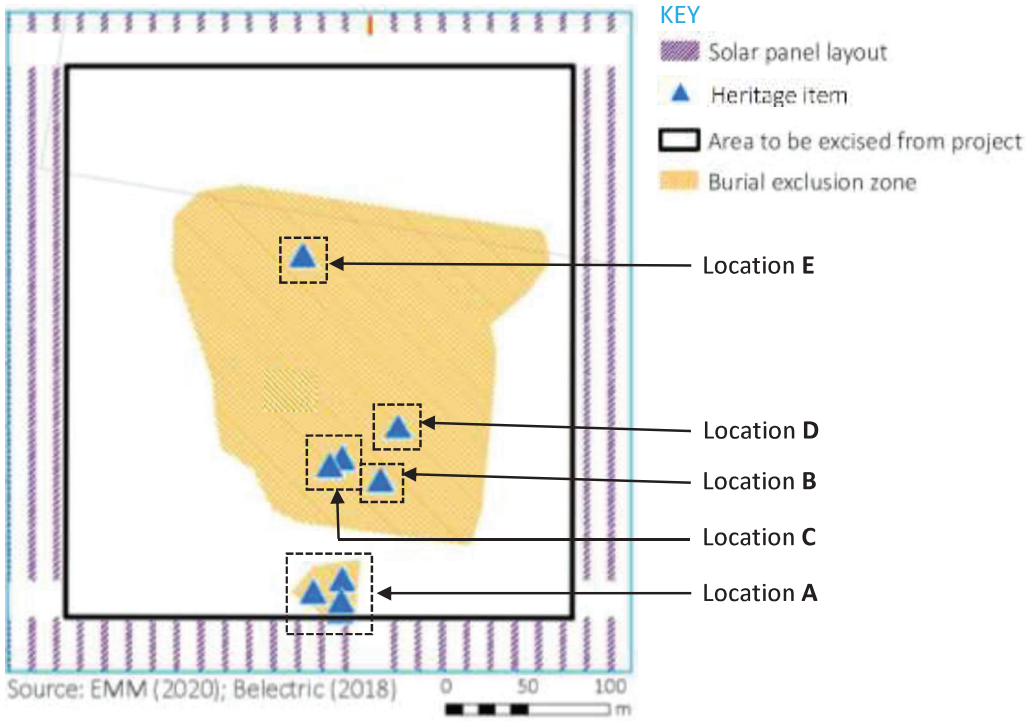


Plate 2.1 Diagrammatic plan of the burial exclusion zone within Block 84. Locations with artefact or human remain clusters have been identified and extrapolated in the table below (refer Table 1).

The following Table 1 contains images pertaining to the found human remains and artefacts that are distributed over five locations (A-E). The table includes information of the location of the artefacts within the survey area, their coordinates and a brief description of the finds:

TABLE 1

Location	Location ID.	Coordinates	Zone	Description
A	1	Easting: 728,524.00 Northing: 6, 150,525.00	54	Human remains of lower foot bone or ankle that is surround smaller bone fragments within 50 x 50cm area.

Plate A.1.1: Direction North

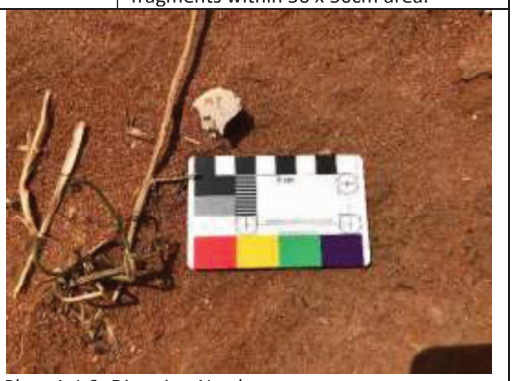


Plate A.1.2: Direction North

	2	Easting: 728,524.00 Northing: 6,150,542.00	54	Tibia bone fragment.

Plate A.2.1: Direction South

Plate A.2.2: Direction North

B	3	Easting: 728,529.00 Northing: 6,150,589.00	54	Silcrete flake.

Plate B.3.1: Direction North

Plate B.3.2: Direction North-West

TABLE 1				
Location	**Location ID.**	**Coordinates**	**Zone**	**Description**
	4	Easting: 728,536.00 Northing: 6,150,591.00	54	Hearth.

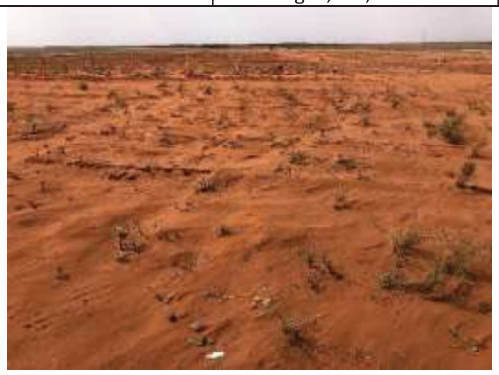


Plate B.4.1: Direction North

Plate B.4.2: Direction North

C	5	Easting: 728,522.00 Northing: 6,150,614.00	54	Cluster of small bone fragments. Unknown bone type.

Plate C.5.1: Direction North

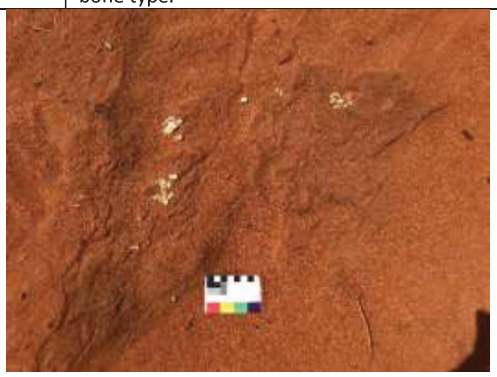


Plate C.5.2: Direction North

6	Easting: 728,526.00 Northing: 6,150,619.00	54	The primary burial site with the greatest concentration of bone fragments, located on the crest of the sand body that includes the skeletal remains of a single individual or potentially multiple individuals comprising a skull, multiple teeth and leg bone fragments as well as a worked and partly ground stone implement located close to the head of the individual and fragments of freshwater mussel shells.

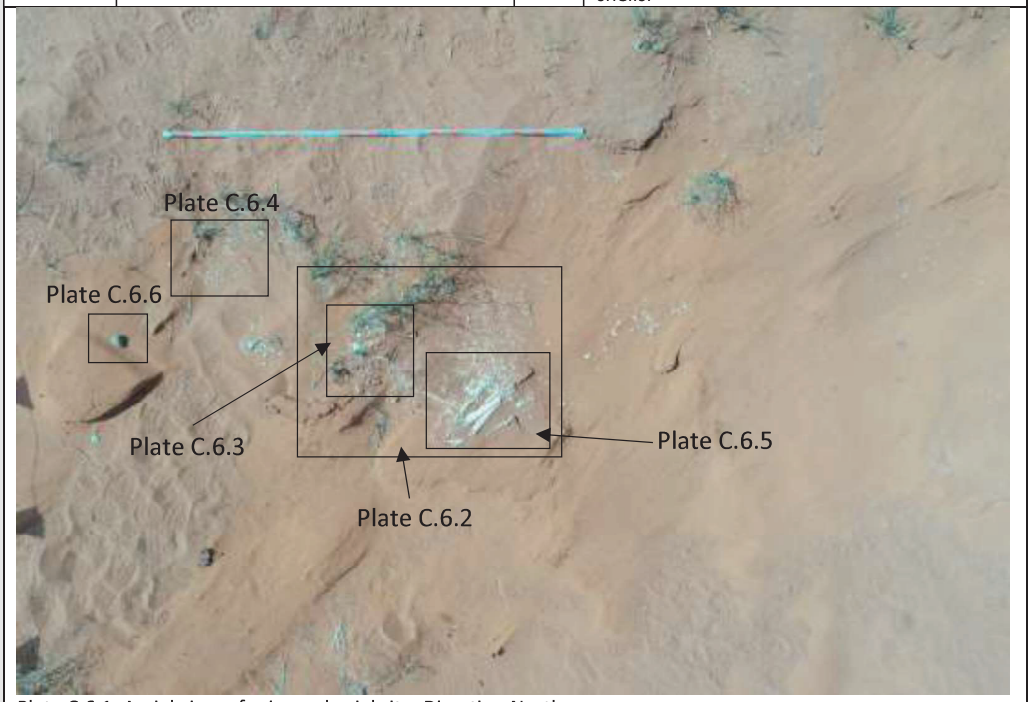


Plate C.6.1: Aerial view of primary burial site. Direction North

Plate C.6.2: Direction North – complete burial

Plate C.6.3: Direction North – skull and jaw fragments

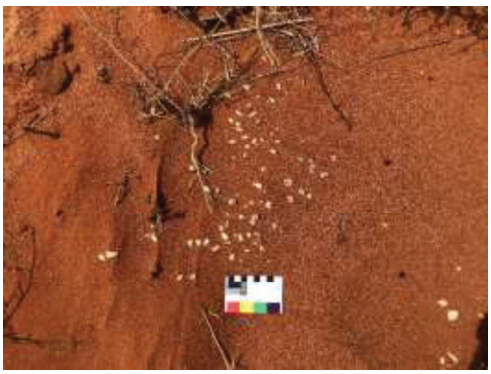


Plate C.6.4: Direction North – scattered teeth

Plate C.6.5: Direction North-West – lower body remains

Plate C.6.6: Direction North – stone implement

D	7	Easting: 728,567.00 Northing: 6,150,637.00	54	Fresh water shell material.

Plate D.7.1: Direction North-East

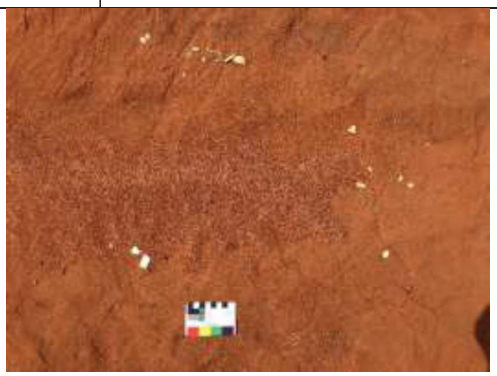


Plate D.7.2: Direction North

E	8	Easting: 728,503.00 Northing: 6,150,740.00	54	Bone fragments. Unknown bone type.

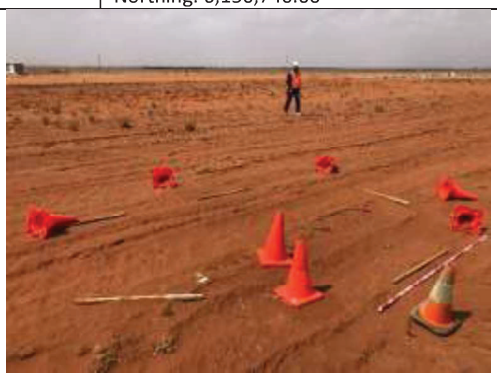


Plate E.8.1: Direction North-East

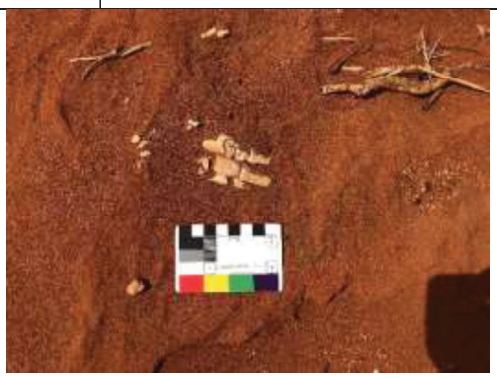


Plate D.8.2: Direction North

9	Easting: 728,513.00 Northing: 6,150,734.00	54	Potential hearth and heat retainer.

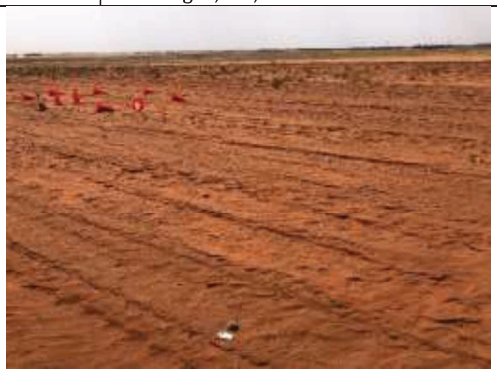


Plate E.9.1: Direction North-West.

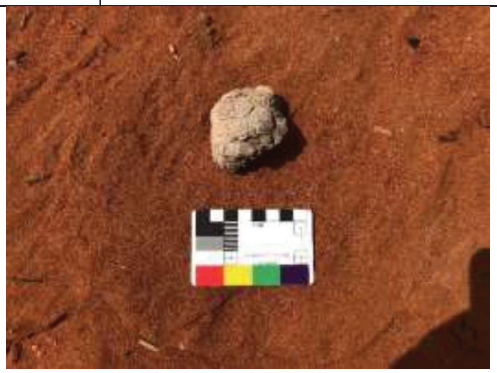


Plate D.9.2: Direction North

	10	Easting: 728,535.00 Northing: 6,150,717.00	54	Potential hearth and heat retainers.
	 Plate E.10.1: Direction North-West		 Plate E.10.2: Direction North	

2. Site Inspection Attendees:

- Smokey Murray (Yitta Yitta/Nari Nari Traditional Owners Corporation);
- Neville Murray (Chair, Balranald Local Aboriginal Land Council);
- Damien Aidon (CEO Balranald Local Aboriginal Land Council);
- Maria Edwards (Yitta Yitta/Nari Nari);
- John Jackson (representing his family from the Wadi tribes);
- Patsy Winch (Mutthi Mutthi);
- Coral Ellis (Ms Winch's friend);
- EMM Heritage (on behalf of Belectric):
  - Pamela Kottaras (lead archaeologist); and
  - Ryan Desic (archaeologist);
- Department of Planning, Industry and Environment:
  - John Gilding (archaeologist); and
  - Lyndon Patterson (archaeologist);
- Warren Crocombe (Downer PM);
- Russell Briggs (Belectric PM); and
- Tom Huber (Belectric HSE).

3. Additional finds from monitoring works 2 – 13 March 2020

Plate 3.1 Grinding plate fragment; collected from Block 85
UTM 54
E 0728376
N 6151107

Plate 3.2 Small bone fragment; collected from Block 85
UTM 54
E 0728502
N 6150947

Plate 3.3 Stone flake; collected from Block 84
UTM 54
E 0728528
N 6150536

Plate 3.4 Shell fragments; collected from Block 84
UTM 54
E 0728481
N 6150541

Table 3.1 Additional human remains located during monitoring works in Block 84

Site elements	Coordinates	Bone articulation	Photograph	Comments
84-HR1	E 0728490.85 N 6150530.19	Radius piece		N/A
	E 0728488.52 N 6150530.34	Distal end of a humerus		In association with above fragment.
84-HR2	E 0728529.42 N 6150537.67	Long bone fragment		Fragment was found in proximity to the tibia fragment, as such it was repositioned to sit with the tibia (better protected from elements/foot traffic).

Table 3.1 Additional human remains located during monitoring works in Block 84

Site elements	Coordinates	Bone articulation	Photograph	Comments
84-HR3	E 0728522.15 N 6150548.09	Long bone fragment		Fragment was found in proximity to the tibia fragment, as such it was repositioned to sit with the tibia (better protected from elements/foot traffic).
84-HR4	E 0728533.79 N 6150531.63	Long bone fragment		Fragment was found in proximity to the tibia fragment, as such it was repositioned to sit with the tibia (better protected from elements/foot traffic).
84-HR5	E 0728482.12 N 6150533.46	Radius and fragments		Likely associated with the humerus and possible radial fragment.

Table 3.1 Additional human remains located during monitoring works in Block 84

Site elements	Coordinates	Bone articulation	Photograph	Comments
84-HR6	E 0728446.75 N6150534.23	Small bone fragments – undetermined to be human		Bone fragments are too small to determine if of human origin. However, due to the overall site context, proximity to confirmed human skeletal remains, the level of weathering on the bones, and the level of ground disturbance in the area it is likely that these are of Aboriginal origin and so have been included in the site's exclusion zone.

Appendix B

Meeting minutes 14 January 2020

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

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

14 February 2020

Tom Huber
Work Health and Safety
Belectric
For Limondale Sun Farm Pty Ltd part of
Innogy Renewables Pty Ltd

Re: Aboriginal heritage advice - human remains - Limondale Sun Farm

Dear Tom,

This letter records the minutes from the meeting held at the Limondale Sun Farm construction compound to discuss the Aboriginal human remains discovered on Block 84. It also provides advice to the owner of the sun farm, Limondale Sun Farm Pty Ltd, a subsidiary of Innogy Renewables Pty Ltd. EMM Consulting Pty Limited has been consulting with Belectric HSE (Belectric) to suitably manage the archaeological/cultural site that was discovered in Block 84 (Appendix 1; Figure 1). The find has been identified as an Aboriginal burial that may be of considerable age, of what is likely an adolescent individual; two concentrations of teeth suggests the remains of at least two individuals, while a range of other cultural material was also observed.

An additional area of bone was found on Block 71 and 72, which were assessed to be sheep in one instance and unidentifiable in another (Appendix 1; Figure 1).

The western margin of the sand body on Block 83 was also inspected as this section was mapped by the surveyor as the edge of the soil landscape; the extent of the sand body will be investigated as part of future archaeological investigation through pedestrian field survey.

BACKGROUND

EMM Consulting Pty Limited (EMM Heritage) was contacted by Belectric and advised of possible human remains and to seek advice on the subsequent steps to manage the find should it be determined to be Aboriginal ancestral remains. A concentration of bones, including parts of a skull, mandible, teeth and long bones, was found on Tuesday 7 January 2020 and cordoned off using plastic bollards and tape. The burial was fenced-off within an area of approximately 5 m by 4 m within an exclusion zone that encompassed the majority of the sand body within which it was found.

Project approval (SSD 8025) contains a provision for the discovery of human remains:

> 17. If human remains are discovered on site, then all work surrounding the area must cease, and the area must be secured. The Applicant must notify the NSW Police and OEH as soon as possible following the discovery, and work must not recommence in the area until this is authorised by OEH.

The discovery of human remains is a matter that is legislated under the *Coroners Act 2009* (NSW) unless those remains are determined to be older than 100 years (Section 19 of the Act), at which point the remains are treated as Aboriginal ancestral remains. Aboriginal ancestral remains are managed under the *National Parks and Wildlife Act 1979* (NPW Act) and non-Aboriginal human remains are managed under the *Heritage Act*

1977 (Heritage Act). In the current situation, the find has been assessed to be Aboriginal and ancestral in nature.

The discovery was made by an employee of Belectric, who notified Belectric. As set out in the *Limondale sun farming project, NSW: Heritage Management Plan* ((HMP) (Biosis 2017), and required under the *Coroner's Act 2009,* NSW Police was informed of the find and asked to attend the site. Senior Constable Jason Noreen, of Balranald Police Station, attended the site and made a preliminary assessment that the remains were likely to be Aboriginal ancestral remains. Subsequently, SC Noreen photographed the skeleton and advised Belectric and EMM Heritage that NSW Police were not required further other than to lodge certificate to the Coroner. Following NSW Police's assessment, EMM Heritage initiated consultation with the project's registered Aboriginal parties (RAPs) and the archaeologist at the NSW Department of Planning Industry and Environment (DPIE) (John Gilding) to inform them of the find and to arrange a meeting on site to view the remains, and discuss their future management.

The meeting was held on Tuesday 14 January 2020 on site, and was attended by members of EMM Heritage, Belectric, DPIE, and six RAPs (see below). At the completion of the meeting, EMM Heritage archaeologists Ryan Desic and Pamela Kottaras returned to the sand body with Tom Huber (Belectric) to record the burial and other scatters of bone for listing on the AHIMS database; and to assess the western margin of the landform that may encroach on other aspects of the project. Each discrete scatter of bone or shell was recorded for AHIMS as required under Section 89A of the *National Parks and Wildlife Act 1979* (NPW Act).

The western margin of what may be the sand body was also inspected as the surveyed extent overlaps into Block 73. The inspection indicated that:

a) this section of the surveyed area is a gentle slope and unlikely to be part of the sand body containing the ancestral remains; and

b) no Aboriginal objects or potential features were noted.

The RAP consultation meeting minutes are recorded below.

MINUTES

The meeting was held in the Belectric construction compound, as well as on site at the location of the ancestral remains. The meeting commenced at 10.15 am and concluded at 1 pm.

The following people participated in the meeting:

- Smokey Murray (Yitta Yitta/Nari Nari Traditional Owners Corporation);
- Neville Murray (Chair, Balranald Local Aboriginal Land Council);
- Damien Aidon (CEO Balranald Local Aboriginal Land Council);
- Maria Edwards (Yitta Yitta/Nari Nari);
- John Jackson (representing his family from the Wadi tribes);
- Patsy Winch (Mutthi Mutthi);
- Coral Ellis (Ms Winch's friend).
- EMM Heritage (on behalf of Belectric)
    - Pamela Kottaras (lead archaeologist)

- Ryan Desic (archaeologist)

- Department of Planning, Industry and Environment
  - John Gilding (archaeologist)
  - Lyndon Patterson (archaeologist)
- Warren Crocombe (Downer PM)
- Russell Briggs (Belectric PM)
- Tom Huber (Belectric HSE)

Apologies:

- Cynthja Pappin (Wakool Aboriginal Corporation)
- Nanette Smith (Yita Yita/Nari Nari Tribes Aboriginal Corporation)

Minutes – meeting regarding Aboriginal ancestral remains

Item		
1	Welcome to Country	The meeting was opened with a welcome to Country given by Smokey Murray
2	Background to the find	Tom Huber (TH) described how the human remains were discovered and the subsequent actions that led to the meeting. The remains were discovered by Terry Devereaux (Belectric), on Tuesday 7 January 2020, who informed Belectric verbally and then in writing. NSW Police in Balranald was notified, and the find was inspected by Senior Constable Jason Noreen on Friday 10 January 2020. SC Noreen contacted Pamela Kottaras (PBK) to discuss the outcome of his site visit, which was that the skeletal remains are unlikely to be under 100 years old. PBK explained that the communication process involved calling: • DPIE and speaking to John Gilding; • the RAPs based on the information in the HMP; and • liaising with TH to arrange for a meeting between these organisations. PBK also explained that it was difficult to identify who the individual RAPs to contact were but was assisted by Cynthja Pappin and Nanette Smith from the Yita Yita/Nari Nari Tribes Aboriginal Corporation. The purpose of the meeting was to determine if the find was determined to be Aboriginal ancestral remains, and a discussion on the most suitable way to manage the burial was to take place.
Terr3	Site inspection	The meeting attendees went to site to inspect the remains in addition to other occurrences of bone and shell in proximity of the find. John Gilding (DPIE) was the human skeletal expert on site and provided the information related to the bones and estimated date of the burial. It was determined that there are at least four locations in Block 84 with human skeletal material on the crest of the sand body, with two discrete concentrations on the crest, one on the mid slope and one at the base. The main focus of the finds was a fragmenting skeleton in a flexed position with the head to the west and the feet to the east. Two concentrations of teeth were noted, indicating that there may have been two burials location. In addition to the human bones, a worked and partly ground stone implement possibly quartzite, was located close to the head of the individual (west) and fragments of fresh-water mussel shells representing the floodplain mussel and the river mussel. The burial was estimated to be an adolescent supported by the wear on the teeth and one just erupted third molar (wisdom tooth) visible in the mandible. The tooth was visible in the photographs taken of the site by Belectric and NSW Police but was covered by shifting sand at the site inspection. The burial was estimated to be approximately 10,000 to 5,000 years old based on the extent of mineralisation of the bones and the stone implement, which has the appearance of belonging to the technology that developed during the Holocene (12,000 years ago to present). This estimate is based on a visual inspection only. An additional and undetermined collection of small bone fragments was also noted in Blocks 71 and 72 in proximity to a sheep femur. The sand body containing the find has what appear to be hearths, clay heat retainers, stone artefacts and shell fragments in various places. One community member opted to remain in the bus for cultural reasons.

4	Discussion on treatment of the find	The group returned to the office to discuss the most suitable treatment of the find. All attendees were provided with an opportunity to voice their opinions and concerns. The points that arose from the meeting, presented below: • the burial should be left in situ; • archaeological excavation of the bones is not supported by the RAPs; • the burial should be protected but the methods to do this were not fully supported; and included: - protection under a dome; - placing a stick over the burial to trap sand so that the burial is eventually covered; - planting native vegetation around the burial to trap moving sand; and/or - covering with geofabric to delineate the top of the burial in its current form and covering with sand (this may be a short-term but necessary measure given the ferocity of the willy-willies blowing across the project area). • One bone in Blocks 71 and 72, being the sheep femur, was not of concern. The other small scatter, being of indeterminate nature could be covered in geofabric and soil deposit to allow continued use of the existing track; and • the human foot bones, possibly heel and metatarsals should be left in situ and protected.
5	Next steps	Dissemination of minutes to all meeting attendees for further discussion and to come to an agreement on the best way to respectfully and suitably protect the burial. Ongoing consultation to determine the most suitable way to protect the bones following review of all parties of the minutes.

ADVICE

The human burial on the sand body that crosses Blocks 84 and 85 is a rare and significant find to understand past Aboriginal occupation of the region but has implications on the construction program and project budget. The find however, is not totally unexpected in this landscape despite the difficulties in identifying the exact location of Aboriginal burials where burial markers or historical documents no longer survive (if ever present).

The statutory framework that applies in this case is not clearly defined and should the burial need to be moved, authorisation from DPIE (formerly OEH) would be required based on the established management plan. Project approval for the Limondale Sun Farm was made under Part 2 Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), application number SSD 8025. An SSD approval switches off the requirement to obtain a Section 90 of the NPW Act, thereby removing the requirement for a permit to harm an "Aboriginal object" (s86 NPW Act) – and which ancestral remains are defined as - as management of all environmental issues that have been identified on a project are managed by the project-wide approval. However, the legal framework for the removal of Aboriginal ancestral remains under an SSD approval is not clearly defined and can be challenged in the Land and Environment Court, therefore in the event that removal is considered (for example to re-locate) or to undertake archaeological investigation that interferes with the burial, legal action should be sought by Innogy Renewables and consultation with DPIE should be undertaken.

The entirety of Block 84 does not need to be excised as this exclusion would be an arbitrary selection based on the location of the array subarray blocks. The important factor is to identify the extent of the sand body and either excise additional areas of sandy landscape or proceed with extreme caution through sand. Based on observations while on site, however, the sand body has the potential to contain Aboriginal sites and objects that may require management in accordance with the revised management plan (to be completed).

An additional action within Block 84 is the connection of high voltage cables. A power station intended for Block 84 will not be built; the cables that were originally to be connected to this power station will be

connected directly to existing power cables thus reducing further impacts to the sand body. The cables are underground and will be connected within an area of high disturbance.

Consideration of the information provided by the site inspection, consultation with the RAPs and DPIE representatives, has resulted in the following recommended steps:

- Block 83: the western extent of the surveyed landscape rise is unlikely to form a part of the sand body and can be excluded from the excised area. This block was previously surveyed as part of the original SSD assessment. Project work may continue in this block;

- Blocks 71/72: cover the indeterminate bone fragments that are of low likelihood of being human, with two layers of geo-fabric before adding a suitable base to allow vehicles to track over. These bone fragments are too small to identify and therefore the determination of a burial cannot be robustly made, but the presence of an identifiable sheep femur nearby suggests they may be from an animal;

- excise a suitable area around the burial on Block 84 from the sun farm design and protect the burial and other locations where human bones were found and ensure that other sites such as objects and hearths are included;

- continue consultation with the RAPs to decide on the best option to protect the burial;

- protect the small collection of human bones in the corridor separating Block 84 from Block 75 from further degradation by creating an exclusion area around these finds;

- as a short-term solution, cover the burial in geofabric and pin down to try to protect from further wind or water erosion;

- prepare a management plan for the sand body and associated cultural materials with specific management measures to be applied to Block 84 including the burial. The Block 84 management plan will be prepared in consultation with the RAPs, Belectric and DPIE and will include measures to protect the burial as well as protect and/or manage the other cultural features in the block.

    - The final measure for the protection of the burial will be decided with the RAPs, but options include:

        - placing a stick on the burial to trap moving sand;

        - revegetating strategic locations on the sand body with native, endemic vegetation to stabilise the sand; and

        - retaining the geo-fabric cover to protect the elements that are believed to be part of the burial.

- undertake pedestrian survey of the sand body to the north where it enters Block 85 and a re-survey of Block 84 to record now-exposed archaeological elements (Appendix 1; Figure 1):

    - the survey will be guided by the geology and soil landscape;

    - pedestrian survey will aim to identify exposed evidence of burials and other cultural material;

    - continue liaising with the RAPs, who should be given the option to accompany the field archaeologists on survey;

    - the results of each will, by necessity, be delivered in report form to all stakeholders.

- where agreed by all parties, consider undertaking minor invasive investigations of the sand landform (away from any human remains) to obtain chronological and palaeo-environmental samples that may inform its formation and thereby indirectly that of any cultural material within it;

- prepare and lodge an AHIMS site card for the sand body to include the burial and other human bones, Aboriginal objects and hearths. The site card must be provided to DPIE to append to the human remains certificate (EMM has commenced this process);

- continue liaising with DPIE where appropriate;

- ensure that the (correct) certificate is lodged with the coroner at Wentworth District Court by confirming with Balranald Police Station (to be confirmed when Balranald Police respond);

- continue to apply the unexpected finds procedure outlined in the HMP for all future stages of the project; and

- review of the HMP in accordance with sections 5.2.6 and 8 of the HMP (Biosis 2017, p.22-23).

We trust that this letter of advice accurately reflects the discussions relating to the find and subsequent steps and provide Belectric with options that will be acceptable to the RAPs. Belectric and Downer are to be commended for the prompt action taken when this significant find was discovered and for the willingness to negotiate an outcome that serves the Aboriginal community and the project equally.

If you have any questions or comments, please do not hesitate to contact me.

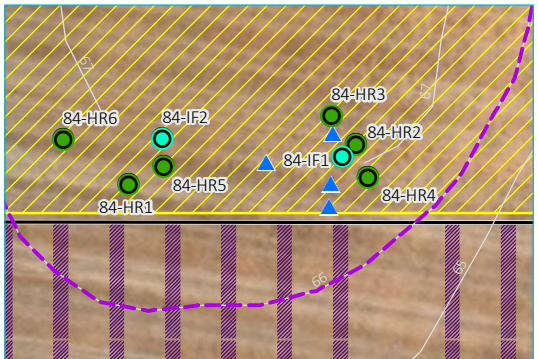
Yours sincerely,

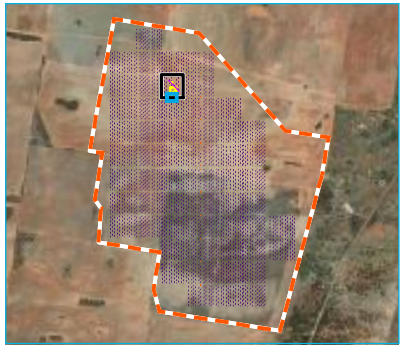
Pamela Kottaras
National Technical Leader - Historical Heritage

pkottaras@emmconsulting.com.au

Appendix A

Figure 1





KEY

- Development footprint (see inset)
- Area to be excised from project
- Burial exclusion zone (May 2020 update)
- Proposed relocation to exclusion zone
- Solar panel layout
- Contour (1 m)
- Dune crest (archaeologically sensitive)
- Previously idenified human remains
- Aboriginal artefact
- Additional human remains
- Artefact collected under ACHMP

Source: EMM (2020); Belectric (2018)

0 25 50 m

0 100 200 m

GDA 1994 MGA Zone 54

N

Proposed exclusion zone

Limondale Sun Farm
Heritage management plan
Figure 2.1

EMM
creating opportunities

Appendix B

Site photographs

Plate B.1 **Aerial view of the sun farm with the proposed location of the high voltage power station as indicated by the blue arrow. View south-east.**

Plate B.2 **View of the burial. North is at top.**

Plate B.3 **Stone implement, possibly unfinished ground-edge axe found in association with the burial.**

Plate B.4 **Possible example of the remains of a highly degraded hearth. View west.**

Appendix C

Field survey report (February 2020)

Ground floor, 20 Chandos Street
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25 February 2020

William Radford
Managing Director
Belectric
For Limondale Sun Farm Pty Ltd part of
Innogy Renewables Pty Ltd
william.radford@belectric.com
cc Thomas Huber
thomas.huber@belectric.com

Re: Limondale Solar Farm, Balranald - Aboriginal heritage advice - human remains- Field Survey February 2020

Dear William,

Background

Following the discovery of ancestral human remains within Block 84 of the Limondale Solar Farm, Balranald, NSW, in late January 2020, EMM Consulting Pty Ltd (EMM Heritage) has been providing ongoing Aboriginal heritage advice to Belectric. This letter provides further advice on the management of Blocks 84 and 85 (Figure 1) following a subsequent site inspection with key Aboriginal stakeholders on 13 and 14 February 2020. The aim of the works was to determine whether any parts of Block 84 and/or Block 85 would be available for future development given the discovery of human remains and the extension of the same landform – an aeolian sand dune – into these areas.

Dr Alan Williams FSA MAACAI and Anthony Dakhoul (EMM Heritage), along with the Balranald LALC (Neville Murray), Yitta Yitta/Nari Nari (Maria Edward), and Wadi Tribes (Caylan Lyon) traditional owners, undertook pedestrian transects across the two blocks to identify any further cultural material.[1] This included the investigation of area along the eastern and western fringe of Block 84 – the central portion containing the human remains, currently forming an exclusion zone – and the entirety of Block 85. Each block being some 900m^2 in size. While other blocks, west and east were initially proposed for inspection, ground disturbance and solar panel installation had already been completed in these areas, and as such were not investigated.

Our findings of these works and recommendations for the establishment of Blocks 84 (part) and 85 are outlined below.

Results

Block 84

Areas to the east, west and north of the exclusion zone (containing human remains) were investigated (Plates 1-3). The areas to the east appeared to be part of the broader surrounding flat (rather than sand dune

[1] Invitation was also extended to the Wakool Aboriginal Corporation and Mutthi Mutthi traditional owner groups, but they were unable to attend the site inspection.

landform upon which the human remains were identified), with modern redeposition of sand from the west. To the west, visibility was poor and was within the sand dune landform.

Two further isolated Aboriginal objects were identified in this block (Plate 4 and 5; Figure 1):

1. 84-1, an isolated glass artefact, was found east of the exclusion zone and was relocated inside the exclusion zone; and

2. 84-2, a small number of highly fragmented bones (n=4) and a greenstone artefact were found on the ridge north of the previous finds, and immediately south of the access track between Blocks 84 and 85. Visibility was poorer in this location with topsoil still present. While the bone was unidentifiable to species, given the proximity to other human remains, it was left untouched, and requires a northward expansion of the exclusion zone by ~40m to the northern edge of Block 84 (without further work to identify its origins and/or that no further material is present in the surrounding topsoil).

No further cultural materials were found east or west of the exclusion zone, despite excellent localised exposures in some parts.

Block 85

The entire block was investigated and showed the sand dune landform extended into much of the southern and central portions (Plates 1-3). Excellent exposures were available from previous grading across parts of the block, but much of the site retains its topsoil (A1 horizon), and as such the majority of observations were being undertaken of a surface some 50cm above the human remain finds. The human remains were identified following grading of the sand dune landform by ~50 cm and are situated on the topsoil and dune core interface, little of which was observable in Block 85 at the time of the inspection.

No cultural materials were identified within this block.

Conclusions and recommendations

Based on the findings of the site inspection, please find the following recommendations:

- due to the findings of unidentified bone at the northern edge of Block 84, it is recommended that the heritage exclusion zone (Figure 1) be extended north from its current position to the edge of the block;

- development activities may proceed to the east and west of the heritage exclusion zone within Block 84 (pile rows 53-55 and 73-78 inclusive (Figure 1)). Given the risk of significant cultural materials be present, all ground disturbance activities, including grading and trenching, in these areas must be monitored by an archaeologist and/or Aboriginal stakeholders. Should significant cultural material be found, works should cease, and processes outlined in the heritage management plan for the site implemented;

- development activities may proceed within Block 85. Given the risk of significant cultural materials be present, all ground disturbance activities, including grading and trenching, in these areas must be monitored by an archaeologist and/or Aboriginal stakeholders. Should significant cultural material be found, works should cease, and processes outlined in the heritage management plan for the site implemented;

- during discussions on site with both Belectric personnel and Aboriginal stakeholders, there remained uncertainty on both the nature and size of the heritage exclusion zone and the methods of re-burial for the previously discovered human remains. It is recommended that Belectric develop further spatial and methodological information on these issues as a priority for discussion with the Aboriginal stakeholders and implementation once agreement has been reached;

- the recommendations above will be integrated into the updated Aboriginal heritage management plan.

If you have any questions or comments, please do not hesitate to contact me on 0438 104 740.

Yours sincerely,

Dr Alan Williams FSA MAACAI
National Technical Leader - Aboriginal Heritage

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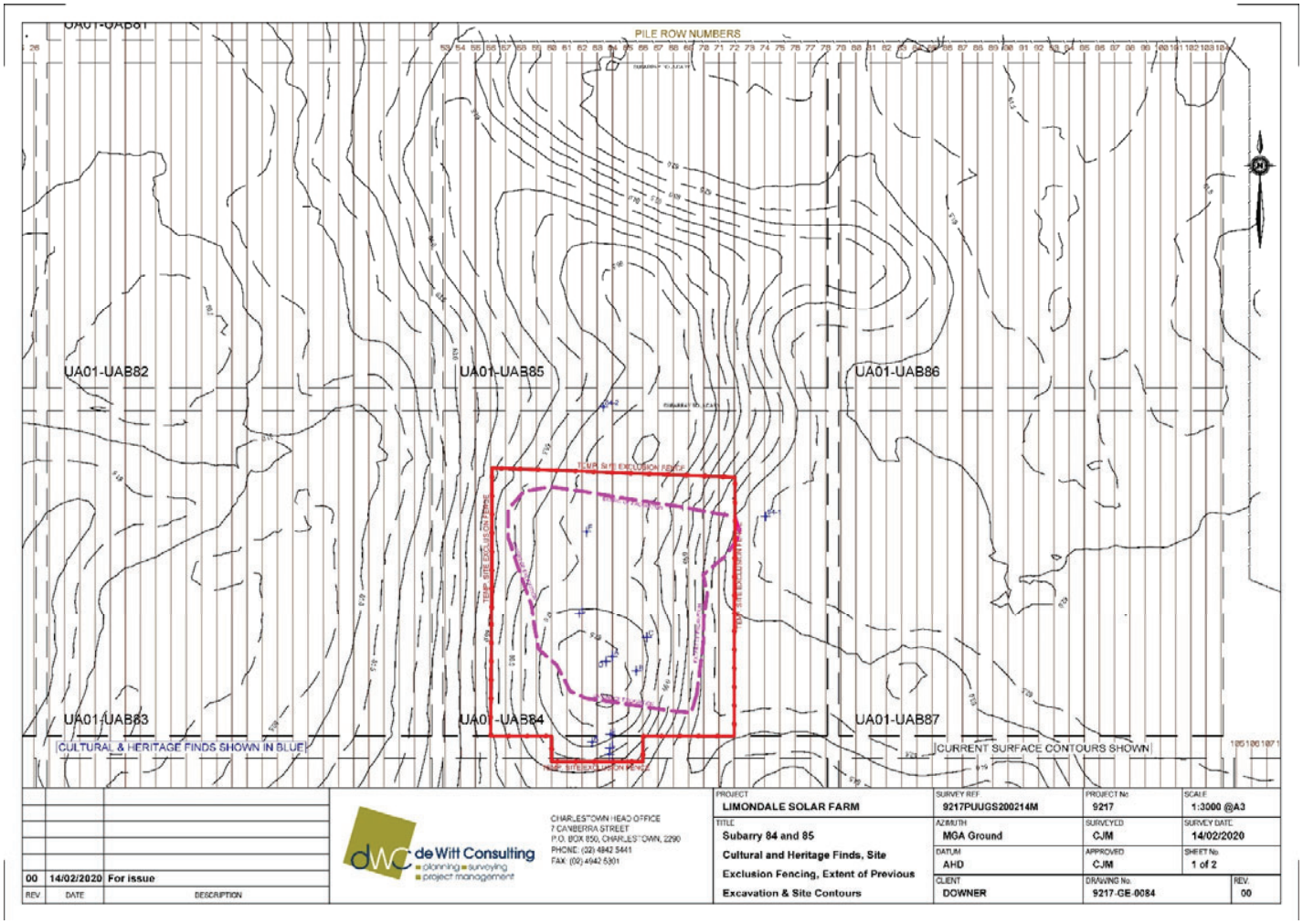

Figure 1 Map of Blocks 84 (UA01-UAB84) and 85 (UA01-UAB85) showing the current heritage exclusion zone (red) and proposed solar (pile) row locations, and previous finds. Also note, sites 84-1 and 84-2 are presented.

Plate 1 **Examples of exposure and visibility in Block 85.**

Plate 2 **Examples of exposure and visibility at the southern edge of Block 85.**

Plate 3 **Localised exposures and visibility from previous grader scrapes in parts of Blocks 84 and 85.**

Plate 4 **An isolated Aboriginal object (glass), 84-1, found east of Block 84.**

Plate 5 **A fragment of unidentified bone on the northern fringe of Block 84, and identified as 84-2.**

Appendix D

Monitoring report (March 2020)

Memorandum

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14 April 2020

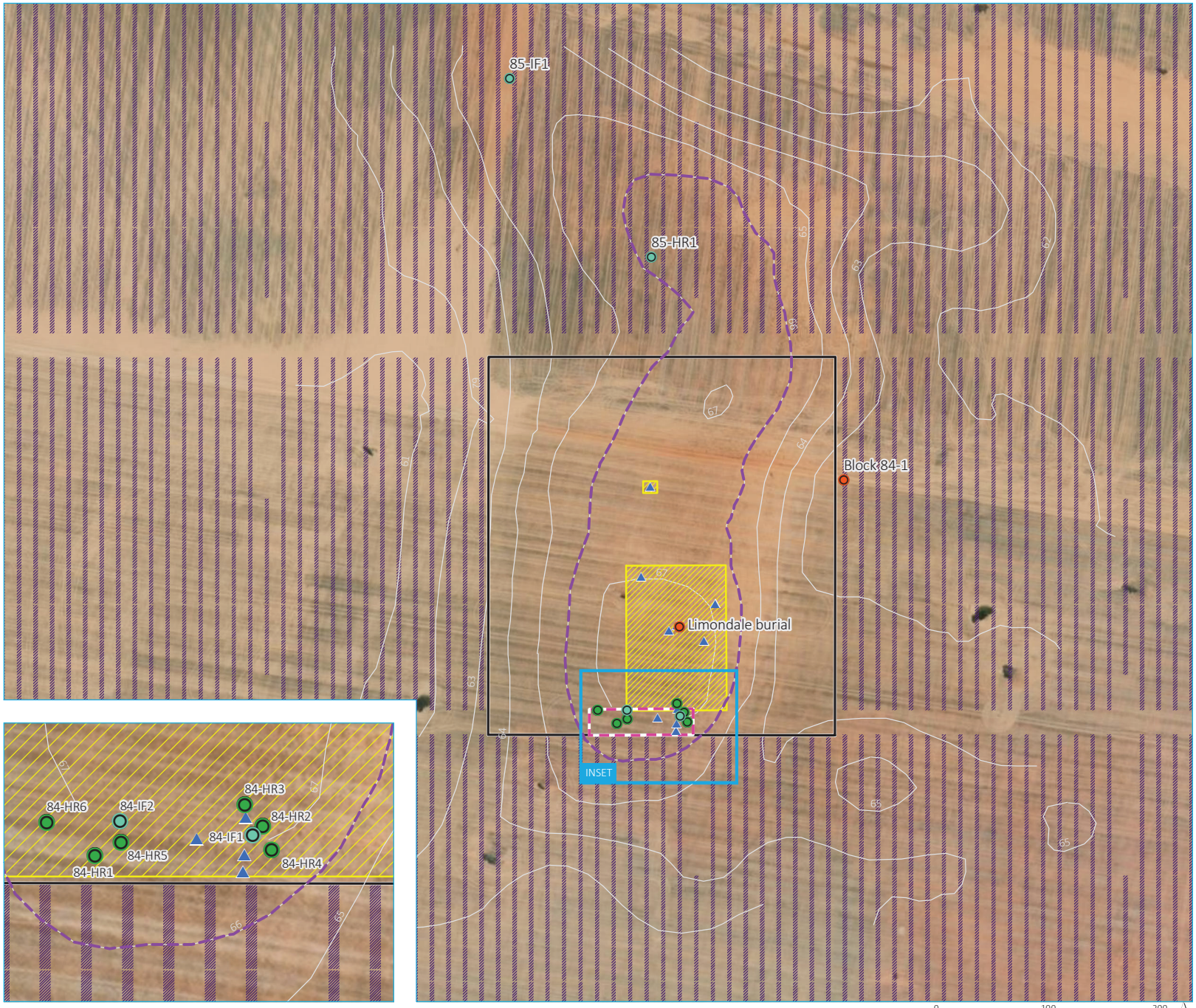
To: William Radford
Managing Director, Belectric
For Limondale Sun Farm Pty Ltd part of Innogy Renewables Pty Ltd
From: Taylar Reid
Subject: Archaeological monitoring - Limondale Solar Farm, Balranald - 2-13 March 2020

1 Introduction

EMM Consulting Pty Limited (EMM) has been engaged by Belectric HSE Pty Ltd (Belectric) to provide ongoing Aboriginal cultural heritage advice and monitoring services following the discovery of human remains within Block 84 of the Limondale Sun Farm in Balranald, New South Wales.

In early January 2020, EMM was contacted by Belectric to provide Aboriginal heritage advice following the discovery of possible human remains within the Limondale Solar Farm project footprint. Following inspection of these finds, and in discussion with NSW Department of Planning, Industry and Environment (DPIE), NSW Police, the proponent, and the Aboriginal community, they were determined to be ancestral Aboriginal remains and a management strategy for them was developed. Specifically, the locale was subsequently excised from the proposed development of the solar block (#84), and an exclusion zone placed around the finds (refer Figure 1.1). Since this discovery, all further activities proposed in the vicinity of Block 84 or nearby (~400 metre (m) radius), have been subject to archaeological monitoring by EMM personnel and/or representatives of the Aboriginal community when someone in the community has made themself available. These included works in mid-February focussing on Block 85 and areas immediately around the exclusion zone.

This memorandum provides information on an additional phase of on-site archaeological monitoring, which included identification of additional Aboriginal ancestral remains, which took place from 2–13 March 2020.



KEY

- Development footprint (see inset)
- Area to be excised from project
- Burial exclusion zone (May 2020 update)
- Proposed relocation to exclusion zone
- Solar panel layout
- Contour (1 m)
- Dune crest (archaeologically sensitive)
- Previously idenified human remains
- Aboriginal artefact
- Additional human remains
- Artefact collected under ACHMP

Source: EMM (2020); Belectric (2018)

Proposed exclusion zone

Limondale Sun Farm
Heritage management plan
Figure 2.1

EMM
creating opportunities

2 Archaeological monitoring

Monitoring of the earthworks and the removal of pallets containing solar panels from Block 84 was conducted from 2–5 March 2020 by Taylar Reid (EMM archaeologist), Neville Murray (Balranald Local Aboriginal Land Council (BLALC)), and Bradley Spiers (Downer, WHS site officer). Additional monitoring occurred from 10–13 March 2020 by Taylar Reid and Greg Ho Sing (EMM archaeologists) and Shane Murray (BLALC).

The location of cultural material was recorded with a GPS and any non-skeletal remains were bagged and tagged in accordance with the project's Cultural Heritage Management Plan and is currently being securely stored in the Downer WHS filing cabinet on-site until a more permanent on-site location is chosen in discussion with the Aboriginal community.

2.1 Week 1: 2 – 5 March 2020

The monitoring works that occurred from 2–5 March 2020 involved the monitoring of a trenching machine for the purposes of laying electrical cables, and the removal of pallets containing solar panels that were no longer to be used within the exclusion zone (refer Figure 1.1).

2.1.1 Isolated Aboriginal objects

A total of four isolated Aboriginal objects were located during the monitoring activities. Two isolated finds were located during the trenching activities: a grinding plate fragment and a small, potentially human, bone fragment – both within Block 85. The bone fragment was too small to determine with any certainty if it was of human origin, however as the bone had weathering consistent to the other human remains previously found, and within the same dune crest landform it is considered to be likely human. Due to its distance from the previously recorded skeletal remains, and given no other skeletal remains were found in the vicinity, it was treated as an isolated find and collected. Additional investigation of the area (~5 m x 5 m), including careful soil removal was undertaken before trenching activities could continue, but no additional cultural material was found.

Two additional Aboriginal objects were located within Block 84, one consisting of a stone flake and the other consisted of small pieces of clamshell, a known food source.

Photographs of the isolated finds are shown in Plate 2.1 to Plate 2.4 and their position within the landscape is represented in Figure 1.1.

Plate 2.1 Grinding plate fragment; Block 85

Plate 2.2 Small isolated bone fragment; Block 85

Plate 2.3 **Stone flake; Block 84**

Plate 2.4 **Shell fragments; Block 84**

2.1.2 Aboriginal ancestral remains

The skeletal remains outlined in Table 2.1 were discovered on the dune crest within Block 84 during the monitoring works for the removal of pallets containing the solar panels that were no longer required. The additional human remains were found in the vicinity of the previously recorded human remains (refer Figure 1.1) and as such were already situated within the exclusion zone curtilage. It must be noted that some of the bones were highly fragmented and could not be positively identified. However, given their proximity to other finds of human remains, they were treated as such (with the support of Belectric). The additional skeletal remains were flagged with stakes and high visibility flagger tape to avoid inadvertent impacts into the future, while management of the re-burial and/or relocation of these remains is discussed.

Upon discovery (2 March 2020), the Balranald Police Station was notified, and Senior Constable Jason Noreen attended the site to conduct a preliminary assessment. During discussions it was agreed that the remains were likely to represent Aboriginal ancestral remains, and the finds were subsequently managed in accordance with previous discoveries of human remains. Specifically, they were fenced off within an exclusion zone, pending further discussion of their management with the Aboriginal community, and DPIE were required.

Photographs of the finds are presented in Table 2.1.

Table 2.1 Additional human remains located during monitoring works in Block 84

Site name	Coordinates	Bone articulation	Photograph	Comments
84-HR1	E 0728490.85 N 6150530.19	Radius piece		N/A
	E 0728488.52 N 6150530.34	Distal end of a humerus		Same site as above.

Table 2.1 Additional human remains located during monitoring works in Block 84

Site name	Coordinates	Bone articulation	Photograph	Comments
84-HR2	E 0728529.42 N 6150537.67	Long bone fragment		Found in proximity to the previous find (AHIMS #51-5-0319); as such has been moved to sit with the tibia of that find (better protected from elements/foot traffic).
84-HR3	E 0728522.15 N 6150548.09	Long bone fragment		Found in proximity to the previous find (AHIMS #51-5-03190); as such has been moved to sit with the tibia of that find (better protected from elements/foot traffic).

Table 2.1 Additional human remains located during monitoring works in Block 84

Site name	Coordinates	Bone articulation	Photograph	Comments
84-HR4	E 0728533.79 N 6150531.63	Long bone fragment		Found in proximity to the previous find (AHIMS #51-5-0319); as such has been moved to sit with the tibia of that find (better protected from elements/foot traffic).
84-HR5	E 0728482.12 N 6150533.46	Radius and fragments		Likely associated with the humerus and possible radial fragment.

Table 2.1 Additional human remains located during monitoring works in Block 84

Site name	Coordinates	Bone articulation	Photograph	Comments
84-HR6	E 0728446.75 N6150534.23	Small bone fragments – undetermined to be human		Bone fragments are too small to determine if of human origin. However, due to the overall site context, proximity to confirmed human skeletal remains, the level of weathering on the bones, and the level of ground disturbance in the area it is likely that these are of Aboriginal origin and so have been included in the site's exclusion zone.

2.2 Week 2: 10 – 13 March 2020

The monitoring works that occurred from 10–13 March 2020 included further cable trenching activities and the cleaning and capping of the abandoned electric cables situated within the isolator pad in Block 84. Regular discussions took place on site during the process of removing the blown-in sand from the isolator trenches, which required a heavy-rigid truck to park next to the isolator pad in order to vacuum the introduced sand from the trenches. Due to the heavy nature of the truck and requiring several trips back and forth across the dune crest, prior to the works commencing, a "work area" was cleared to provide safe access for the vehicle. This was completed under the supervision of Taylar Reid and Shane Murray and consisted of a grader removing 50 millimetres (mm) of topsoil at a time down to compacted sand, considered to be the dune core and very unlikely to contain cultural material below this level. No cultural material was located during the grading works and all members on site agreed that the vacuuming of the introduced sand within the previously excavated trenches could continue without supervision by an archaeologist or RAP, as all works were taking places in previously disturbed areas.

Adjustments were made throughout the week regarding the level of ground disturbances that would be required within Block 84 due to the high archaeological potential of the dune crest and the proximity of previous finds. This included the decision to leave the posts initially installed to hold the solar panels, which would require considerable ground disturbance to remove them and possibly risking inadvertent impacts to potential Aboriginal objects or bone fragments buried under the sand. An example of post removal from another block is show in Plate 2.5.

A meeting was held on Thursday 12 March 2020 with all site management from Downer, Belectric, Tobco, EMM and BLALC to discuss the level of monitoring that would be required for upcoming ground disturbance works both within and outside of the exclusion zone in Block 84. The meeting concurred that earthworks taking place outside of the exclusion zone where the dune slope transitions onto a flat plain did not require monitoring as the trenching activities were primarily occurring within road corridors and areas previously disturbed for the initial construction of the solar farm, and this landform was considered to have a lower likelihood of containing subsurface cultural material. Monitoring activities were recommended for any works taking place on the crest of the dune within blocks 84 and 85 and using the grader to remove 50 mm of topsoil at a time down to the dune core. This occurred under supervision of the archaeologist. No cultural material was identified.

Plate 2.5 **Example of post removal; view east**

Plate 2.6 **Senior Constable Jason Noreen photographing the humerus; view south**

Plate 2.7 **Monitoring trenching activities; view north-west**

Plate 2.8 **Monitoring sand removal within the isolator trenches in Block 84; view south**

2.2.1 Potential hearth site

During the sand removal from within the trenched portions of the isolator pad in Block 84, a linear grey and white charcoal smear was identified in a section in the western wall of the south-eastern trench (refer 84-IF-1 in Figure 1.1). Upon excavation of the deposits above the feature, it was revealed that the ash and charcoal formed as the result of a tree root burn, indicated by the wood that extended around the edge of the features. It was therefore assessed to likely be from a natural bushfire, rather than of anthropogenic origin. Charcoal samples were collected in the event that possible dating opportunities may occur, since the feature may represent a former land surface, which can indirectly inform the past history of nearby cultural materials.

Photographs of the works are presented in Plate 2.9 to Plate 2.12.

Plate 2.9 **Potential hearth within trench wall; view west**

Plate 2.10 **Close up of charcoal and ash smear; view west**

Plate 2.11 Post excavation, root visible around the back of the smear; west at top

Plate 2.12 Tree root visible in section; view west

3 Conclusion and recommendations

Overall, the monitoring works recovered four isolated finds and seven additional Aboriginal skeletal fragments. These latter finds were all within the exclusion zone previously established for AHIMS #51-5-0319. The AHIMS site card will be updated to include these additional finds and a copy will be provided to Belectric upon submission into the AHIMS database. Fencing options for around the exclusion zone are already being discussed between EMM and Belectric with the intention to have this installed as soon as practicable.

For future works, the following is recommended:

- access to the exclusion zone in Block 84 is only permissible under supervision by someone who knows the cultural features and issues associated with the area. This includes for any rubbish collection or site inspections;
- access to the exclusion zone in Block 84 should be only when necessary. If access is granted by the supervisor, all personnel should be made aware of no-go zones and their visual presentation on site (ie flagging, cones, fencing, etc) prior to undertaking the activity, and informed that the grave must not be approached;
- should any future works be proposed within blocks 84 and 85, discussion should occur with Belectric's heritage advisor as to the nature and location of the works to assess the requirement for any monitoring to occur; and
- a heritage professional and/or Aboriginal representative should be present for any ground disturbance within other parts of blocks 84 and 85 where previous ground disturbance from the development has not already occurred.

EMM will be updating the management plan and will integrate these recommendations. However, in the interim, works may proceed in accordance with the above recommendations.

EMM would like to direct Belectric's attention to one final outstanding issue, which is to address the reburial or ongoing protection of the remains. This should take place in consultation with the Aboriginal stakeholders as to their preferred method, whether this involves reburial of the remains by natural sand drifts or via introduced imported sand, or revegetation measures. EMM will discuss actioning reburial within the next two weeks.

Yours sincerely,

Taylar Reid
Archaeologist
treid@emmconsulting.com.au

Appendix E

Dune regeneration species

Shrubs	Groundcover
Acacia brachybotrya	Aristida jerichoensis var. subspinulifera
Acacia burkittii	Atriplex stipitata
Acacia colletioides	Austrostipa nitida
Acacia microcarpa	Austrostipa scabra subsp. scabra
Acacia oswaldii	Brachyscome lineariloba
Acacia sclerophylla var. sclerophylla	Calandrinia eremaea
Acacia wilhelmiana	Calotis cuneifolia
Alectryon oleifolius subsp. canescens	Chenopodium cristatum
Beyeria opaca	Chenopodium desertorum subsp. anidiophyllum
Bossiaea walkeri	Chenopodium desertorum subsp. desertorum
Capparis lasiantha	Dissocarpus paradoxus
Chenopodium curvispicatum	Enchylaena tomentosa
Dodonaea bursariifolia	Enneapogon gracilis
Dodonaea viscosa subsp. angustissima	Halgania cyanea
Eremophila glabra	Lomandra effusa
Eremophila sturtii	Lomandra leucocephala subsp. leucocephala
Eutaxia microphylla	Maireana sclerolaenoides
Exocarpos sparteus	Maireana triptera
Grevillea huegelii	Olearia muelleri
Hakea tephrosperma	Omphalolappula concava
Maireana brevifolia	Paspalidium distans
Maireana erioclada	Podolepis capillaris
Maireana georgei	Ptilotus exaltatus var. exaltatus
Maireana pentatropis	Ptilotus seminudus
Maireana pyramidata	Salsola tragus subsp. tragus
Maireana sedifolia	Sclerolaena diacantha
Maireana triptera	Sclerolaena obliquicuspis
Myoporum platycarpum	Sclerolaena parviflora
Olearia pimeleoides	Sclerolaena patenticuspis
Rhagodia spinescens	Triodia scariosa subsp. scariosa
Senna form taxon 'filifolia'	Vittadinia cuneata
Senna form taxon 'petiolaris'	Zygophyllum apiculatum
Westringia rigida	Zygophyllum aurantiacum

Key

Best for soil stabilistaion	High priority for inclusion
Associated with both dune and sandplains PCTs	Most likely to ber successful due to broader soil preferences
Associated with dune PCT (171) only	More likely to grow successfully in deeper sand areas
Associated with sandplain PCT (170) only	More likely to grow successfully in harder soil areas
May be a small tree	Possibly unsuitable

Appendix F

Fence post excavation monitoring

Level 3, 175 Scott Street
Newcastle NSW 2300

T 02 4907 4800
E info@emmconsulting.com.au

www.emmconsulting.com.au

25 September 2020

Tom Huber
Belectric Pty Ltd

Re: J190764 Limondale burials fencepost excavation

Dear Tom,

1 Introduction

EMM Pty Ltd (EMM) has been engaged by Belectric Pty Ltd at the Limondale Sun Farm located 13km from Balranald on Yenga Way in the Balranald Local Government Area (LGA).

The site visit was attended by Terry Devereaux (Belectric), Patsy Winch (Mutthi Mutthi), and Taylar Reid (EMM archaeologist) on 24 June 2020. The purpose of the site visit was twofold: hand excavate the soft top layer of sand down to the culturally sterile dune core at the proposed fencepost locations and to relocated a number of small bone fragments that have been scattered across the road from ploughing activities into the exclusion zone for their ongoing protection. The other issue that was discussed on site was the regeneration of the vegetation across the dune, which was proposed in the addendum to the HMP as a suitable method approved by the RAPs and proponent to trap sand and naturally rebury the human remains.

2 Fencepost hand excavation

A total of 46 fencepost locations were excavated with a shovel into the dune core. Some locations had natural charcoal markings from burnt tree stumps and roots though no artefacts, hearths, ovens, or remains were identified during the process.

3 Relocation of human bone fragments

Several very small bone fragments, which were no longer in situ and were at risk of being disturbed further due to the high wind erosion from the local willy willies were relocated to the tibia location (UTM 54 728526mE and 6150542mN), which is the closest large and possibly in situ bone. The bones were buried in a shallow hole south-east of the tibia, which was agreed upon and monitored by all site participants.

Yours sincerely,

Taylar Reid
Archaeologist
treid@emmconsulting.com.au

Appendix G

HMP RAP consultation

Aboriginal Consultation Requirements for Proponents (DECCW 2010)*							
ABORIGINAL REGISTERED PARTIES							
Project Name: HH Limondale Sun Farm UF			**Project #:** J190764				
Registration Order	**Registration Date**	**Organisation/Person**	**Name**	**Phone**	**Email_1**	**Address_1**	**Address_2**
1	14/Jan/20	Balranald Local Aboriginal Lands Council	Damien Aidon (CEO)	0467 810 406	damein20@gmail.com	iscbu13@gmail.com	iscbn13@gmail.com
2	14/Jan/20	Balranald Local Aboriginal Lands Council	Neville Murray (Chairman)	0498 645 472			
3	14/Jan/20	Yitta Yitta/Nari Nari	Smokey Murray	0467 539 304	anotherfive05@gmail.com		
4	14/Jan/20	Nari Nari/Yitta Yitta	Maria Edwards	0448 925 027	withewaa@gmail.com		
5	14/Jan/20	Wadi Wadi tribes	John Jackson (rep. family)	0427 927 675	John.Jackson@health.nsw.gov.au		
6	14/Jan/20	Mutthi Mutthi	Patsy Winch	0406 693 628	pltwinch@hotmail.com		
7	14/Jan/20	Wakool Aboriginal Corporation	Cynthia Pappin	0400 634 994	info@wakool.com.au		
8	14/Jan/20	Pappin Family Corporation	Gary Pappin	0487 430 798	garyjpappin47@hotmail.com		
9	14/Jan/20	Balranald Local Aboriginal Lands Council	Shane Murray (Neville's son)	0422 713 863			
10	N/A	David O'Neill	Maria Edwards' support worker	0408 908 049			

Aboriginal Consultation Requirements for Proponents (DECCW 2010)*						
ABORIGINAL COMMUNICATIONS LOG						
Project Name: HH Limondale Sun Farm UF					**Project #:** J190764	
DATE	**OUTGOING / INCOMING**	**ORGANISATION**	**CONTACT MADE BY**	**CONTACT TO**	**CONTACT TYPE**	**COMMENTS**
7-Jan-20	Incoming	Belectric	Tom Huber	Pamela Kottaras	Phone	EMM was contacted by Belectric and advised that possible human remains were located on site and requested advice on the subsequent steps should they be determined to be Aboriginal ancestral remains. Senior Constable Jason Noreen was called by Belectric to attend site and conduct a preliminary assessment of the remains, he determined they were likely Aboriginal ancestral remains.
14-Jan-20		EMM, Belectric, Heritage NSW (DPIE at the time), registered Aboriginal parties			Meeting in person	Meeting on site to discuss management of remains and site inspection of remains. In attendance: Smokey Murray, Neville Murray, Damien Aidon, Maria Edwards, John Jackson, Patsy Winch, Coral Ellis, Pamela Kottaras and Ryan Desic (EMM), John Gilding and Lyndon Patterson (Heritage NSW), Warren Crocombe, Russell Briggs and Tom Huber (Belectric).
6-Feb-20	Outgoing	All registered Aboriginal parties	Pamela Kottaras		Email	Emailed January's meeting minutes and results of the site inspection.
11-Feb-20	Outgoing	Balranald Local Aborignal Land Council (BLALC)	Greg Ho Sing	Damien Aidon	Email	Invitation to Fieldwork
11-Feb-20	Outgoing	Balranald Local Aborignal Land Council	Greg Ho Sing	Neville Murray	Email	Invitation to Fieldwork
11-Feb-20	Outgoing	Nitta Nitta Tribal Council	Greg Ho Sing	Cynthia Pappin	Email	Invitation to Fieldwork
11-Feb-20	Outgoing	Pappin Family	Greg Ho Sing	Gary Pappin	Email	Invitation to Fieldwork
11-Feb-20	Outgoing	Nitta Nitta Tribal Council	Greg Ho Sing	Smokey Murray	Email	Invitation to Fieldwork
11-Feb-20	Outgoing	Nitta Nitta Tribal Council	Greg Ho Sing	Patsy Winch	Email	Invitation to Fieldwork
11-Feb-20	Outgoing	Jackson Family	Greg Ho Sing	John Jackson	Email	Invitation to Fieldwork
11-Feb-20	Outgoing	Nitta Nitta Tribal Council	Greg Ho Sing	Maria Edwards	Email	Invitation to Fieldwork
11-Feb-20	Outgoing	Balranald Local Aborignal Land Council	Greg Ho Sing	Damien Aidon	Phone	Follow up call for Invitation to Fieldwork - No answer
11-Feb-20	Outgoing	Balranald Local Aborignal Land Council	Greg Ho Sing	Neville Murray	Phone	Follow up call for Invitation to Fieldwork - No answer
11-Feb-20	Outgoing	Nitta Nitta Tribal Council	Greg Ho Sing	Cynthia Pappin	Phone	Follow up call for Invitation to Fieldwork - Agreed
11-Feb-20	Outgoing	Pappin Family	Greg Ho Sing	Gary Pappin	Phone	Follow up call for Invitation to Fieldwork - No answer
11-Feb-20	Outgoing	Nitta Nitta Tribal Council	Greg Ho Sing	Smokey Murray	Phone	Follow up call for Invitation to Fieldwork - In hospital
11-Feb-20	Outgoing	Mutthi Mutthi Tribal Council	Greg Ho Sing	Patsy Winch	Phone	Follow up call for Invitation to Fieldwork - Number is no longer in service
11-Feb-20	Outgoing	Jackson Family	Greg Ho Sing	John Jackson	Phone	Follow up call for Invitation to Fieldwork - Agreed
11-Feb-20	Outgoing	Nitta Nitta Tribal Council	Greg Ho Sing	Maria Edwards	Phone	Follow up call for Invitation to Fieldwork - No answer
11-Feb-20	Incoming	Balranald Local Aborignal Land Council	Greg Ho Sing	Damien Aidon	Phone	Called back. Agreed to send a BLALC member to fieldwork
11-Feb-20	Incoming	Balranald Local Aborignal Land Council	Greg Ho Sing	Neville Murray	Phone	Called back. Agreed to send a BLALC member to fieldwork
11-Feb-20	Incoming	Nitta Nitta Tribal Council	Greg Ho Sing	Maria Edwards	Phone	Called back. Agreed to send a BLALC member to fieldwork
12-Feb-20	Outgoing	Balranald Local Aborignal Land Council	Greg Ho Sing	Damien Aidon	Email	Provided fieldwork details - rate, PPE, lunch. Request for insurances.
12-Feb-20	Outgoing	Balranald Local Aborignal Land Council	Greg Ho Sing	Neville Murray	Email	Provided fieldwork details - rate, PPE, lunch. Request for insurances.
12-Feb-20	Outgoing	Jackson Family	Greg Ho Sing	John Jackson	Email	Provided fieldwork details - rate, PPE, lunch. Request for insurances.
12-Feb-20	Outgoing	Nitta Nitta Tribal Council	Greg Ho Sing	Cynthia Pappin	Email	Provided fieldwork details - rate, PPE, lunch. Request for insurances.
12-Feb-20	Outgoing	Balranald Local Aborignal Land Council	Greg Ho Sing	Maria Edwards	Email	Provided fieldwork details - rate, PPE, lunch. Request for insurances.
12-Feb-20	Outgoing	Balranald Local Aborignal Land Council	Greg Ho Sing	Damien Aidon	Phone	Confirmation call for fieldwork attendance - No answer.
12-Feb-20	Outgoing	Balranald Local Aborignal Land Council	Greg Ho Sing	Neville Murray	Phone	Confirmation call for fieldwork attendance - Agreed
12-Feb-20	Outgoing	Jackson Family	Greg Ho Sing	John Jackson	Phone	Confirmation call for fieldwork attendance - Agreed
12-Feb-20	Outgoing	Nitta Nitta Tribal Council	Greg Ho Sing	Cynthia Pappin	Phone	Confirmation call for fieldwork attendance - No answer.
12-Feb-20	Outgoing	Balranald Local Aborignal Land Council	Greg Ho Sing	Maria Edwards	Phone	Confirmation call for fieldwork attendance - No answer.
13-Feb-20	Incoming	Pappin Family	Greg Ho Sing	Gary Pappin	Email	Emailed to say Jason Pappin will be attending site.

13-Feb-20	Incoming	Balranald Local Aborignal Land Council	Greg Ho Sing	Damien Aidon	Email	Confirmation email with insurances and details - BLALC confirmed as attending.
13-Feb-20	Incoming	Mutthi Mutthi Tribal Council	Greg Ho Sing	Patsy Winch	Phone	Returned confirmation for fieldwork call.
13-Feb-20	Outgoing	BLALC	Greg Ho Sing	Damien Aidon	Phone	Confirmed John Jackson and Neville Murray as attending. Maria will not be atttending.
13-Feb-20	Outgoing	Pappin Family	Greg Ho Sing	Gary Pappin	Email	To confirm attendance of Jason Pappin.
14-Feb-20	Outgoing	Belectric	Pamela Kottaras	Tom Huber	Email	Emailed January's meeting minutes and provided advice on management of the burial as discussed with the team on site.
24-Feb-20	Outgoing	AHIMS Database	Pamela Kottaras	David Gordon	Email	Submitted the LB1 site card to the AHIMS database.
24-Feb-20	Outgoing	Balranald Local Aborignal Land Council	Pamela Kottaras	Damien Aidon	Phone	Request for LALC to supply one sites officer for the work at Limondale. I will send an email to him with details by tomorrow. Damien agreed and will send the invoice to EMM for the survey work.
28-Feb-20	Outgoing	Balranald Local Aborignal Land Council	Pamela Kottaras	Damien Aidon	Phone	Confirming the BLALC rep on Monday. It is likely to be Neville Murray
2 - 6 Mar 2020		Balranald Local Aborignal Land Council	Taylar Reid	Neville Murray		Fieldwork Week 1
10-13 Mar 2020		Balranald Local Aborignal Land Council	Taylar Reid	Shane Murray		Fieldwork Week 2
12-Mar-20		Belectric, Downer, Tobco meeting	Taylar Reid, Shane Murray		Meeting in person	Meeting to confirm upcoming earthwork priorities and what activities require the presence of an archaeologist and RAP. Results - RAP needed for all activities within Block 84, however if areas to be impacted by truck/trenching are excavated down to dune core (cultural material unlikely to be present below this level) then an archaeologist is not required to be present as well.
15-Mar-20	Outgoing	Delectric, Downer Group	Taylar Reid	Russell Briggs, Tom Huber, Brad Spiers, Alan Williams, Pamela Kottaras	Email	Summary email of the last week of work. Included summary of recommendations discussed at the meeting earlier in the week.
16-Mar-20	Incoming	Downer Group	Kelsey Devine	Taylar Reid	Email	Requested a photo of the find on March 11 - confirmed with her that it was animal remains and the surveyor's point to be deleted (Christian - surveyor). Included photos of other human remains located during the last 2 weeks of fieldwork.
16-Mar-20	Incoming	Balranald Local Aborignal Land Council	Shane Murray	Taylar Reid	Phone	Voice message left on Sunday - not able to attend the monitoring on Monday. Discussion between Pamela and Tom confirmed that it was ok for works to proceed without monitoring - working within a disturbed footprint and only removing blown-in sand.
18-Mar-20	Incoming	Belectric	Thomas Huber	Taylar Reid/Pamela Kottaras	Email	Tom emailed in regard to the RAP not showing up once more and whether works in Block 84 could proceed without their presence on site.
18-Mar-20	Outgoing	EMM Consulting	Pamela Kottaras	Thomas Huber	Email	Pamela emailed to confirm that having a RAP on site was best practice, but works could proceed without their presence as long as any works immediately stop if suspected human remains or Aboriginal objects are encountered and to contact EMM for further advice on how to proceed.
1-Apr-20	Outgoing	Belectric	Taylar Reid	Tom Huber, William Radford, Russell Briggs	Email	Emailed a draft copy of the Police email to Belectric to confirm the accuracy of information and their affirmation for the email to be sent to the Balranald Police.
1-Apr-20	Outgoing	Balranald Police Station	Taylar Reid	Kaan Sengoz	Phone	Called the Balranald police station to aquire the email of the new police officer who has taken over for Jason Noreen (who was recently relocated to Orange)
1-Apr-20	Outgoing	Balranald Police Station	Taylar Reid	Kaan Sengoz (cc'd Tom Huber, Will Radford, Russell Briggs, Pamela Kottaras, Alan Williams)	Email	Emailed the Balranald Police Station with the details of the monitoring works that occurred from 2 - 13 March 2020 including photographs of the human skeletal remains including their coordinates.

17-Apr-20	Outgoing	Belectric	Pamela Kottaras	Tom Huber, Pamela Kottaras, Taylar Reid	Phone	Conference call to discuss potential fencing options around Limondale burials. Largest extent of fencing encompassing all remains is 240m long x 140m wide. Shorter option extends 150m long and 140m wide with an additional smaller fence (10m x 10m) around the northern most section of remains. Signage would be used to highlight no-go heritage zone. To be discussed in consultation with the RAPs.
4-May-20	Outgoing	DPIE	Pamela Kottaras	John Gilding	Phone	Discussion about relocating ex situ bones on dunecrest away from access road and to sit with other bones on the dune crest. JGilding said that in principle bones could be relocated as long as the RAPs are OK with it. But as project is SSD, he suggested the request go to DPIE (the planning section). Plan is to update the HMP to include a section on what to do if human bones are found (as this is not discussed in current HMP). New HMP will be sent to DPIE and RAPs for review prior to installation of exclusion zone fence on dunecrest.
13-May-20	Outgoing	Belectric	Taylar Reid	Terry Devereaux	Phone	Discussed reasons for test excavation prior to drilling in fenceposts for exclusion zone. Explained that even if posts are not near the current finds, there could be additional human remains or artefacts hidden under the soft sand on the dune slope.
1-Jun-20	Outgoing	Belectric	Taylar Reid	Tom Huber	Email	Sent draft HMP addendum to Belectric for review prior to sending to RAPs.
3-Jun-20	Outgoing	All registered Aboriginal parties	Kerryn Armstrong		Email	Addendum to the HMP sent out for review
10-Jun-20	Outgoing	Balranald LALC	Taylar Reid	Damien Aidon	Phone	Follow up on the addendum. BLALC having issues with their computer system and lost all docs. Resent addendum to DA's email. He will review and comment.
10-Jun-20	Outgoing	Yitta Yitta/Nari Nari	Taylar Reid	Smokey Murray	Phone	Follow up on the addendum. He hasn't been well and not checking emails, discussed addendum, he will review when he is able.
10-Jun-20	Outgoing	Nari Nari/Yitta Yitta	Taylar Reid	Maria Edwards	Phone	Phone rang out, no message bank.
10-Jun-20	Outgoing	Wadi tribes	Taylar Reid	John Jackson	Phone	Did not receive email, requested another copy sent through (also to his other email johnjackson@health.nsw.gov.au - this email bounced). He commented on the revegetation - to make sure the plants are native and hardy and not to use chicken wire on the fencing as it blocks and builds up with sand. He suggested Cyclone fencing to keep out animals.
10-Jun-20	Outgoing	Mutthi Mutthi	Taylar Reid	Patsy Winch	Phone	Requested email be sent again but confirmed she agreed with the proposed actions. She would like to be informed of the upcoming fieldwork and would like to be invited out to site again to be involved with the works.
10-Jun-20	Outgoing	Wakool Aboriginal Corporation	Taylar Reid	Cynthia Pappin	Phone	Phone off, no message bank.
10-Jun-20	Outgoing	Pappin Family Corporation	Taylar Reid	Gary Pappin	Phone	No answer, no message bank. Will call back again.
17-Jun-20	Outgoing	Mutthi Mutthi	Pamela Kottaras	Patsy Winch	Phone	Rang and left a message
17-Jun-20	Incoming	Mutthi Mutthi	Patsy Winch	Pamela Kottaras	Phone	Ms Winch returned PBK's call immediately. Ms Winch is happy for the fencepost monitoring and artefact re-location to go ahead on Wednesday 24 June 2020 and will be present during the process. Ms Winch also indicated that the HMP appears to be as per the meeting discussion and in principal supports it. Taylar Reid to provide a hard copy of the report to Ms Winch on Wednesday 24 June 2020 while in the field.
17-Jun-20	Outgoing	Balranald LALC	Damien Aidon	Pamela Kottaras	Phone	Mr Aidon said the addendum was thorough but that he would have to take it to the chair (Neville Murray) for sign-off. Neville Murray was not contacted as Mr Aidon will do that. The fieldwork set for Wednesday 24 June 2020 is fine as it is for conservation purposes. Mr Aidon told me that Smokey Murray is in hospital and suggested that Ms Winch is the person to liaise with him. Therefore, a call to Mr Murray was not made so as not to bother him.
17-Jun-20	Outgoing	Nari Nari/Yitta Yitta	Maria Edwards	Pamela Kottaras	Phone	The mobile phone is currently not accepting incoming calls.
17-Jun-20	Outgoing	Nari Nari/Yitta Yitta	Maria Edwards	Pamela Kottaras	Email	Asking for comment. Taylar Reid CCd

17-Jun-20	Outgoing	Wakool Aboriginal Corporation	Cynthia Pappin	Pamela Kottaras	Phone	Ms Pappin has not read the addendum yet but is fine with the description I gave her. She is also happy for Ms Winch to represent on site for the field work on Wednesday 24 June 2020 as she is an elder and is informed. Garry Pappin, Ms Pappin's husband, has not read the addendum yet but they will discuss and respond. Mr Pappin was not called as Ms Pappin said she would discuss the addendum with him.
17-Jun-20	Outgoing	Wadi Wadi Tribes	John Jackson	Pamela Kottaras	Phone	Mr Jackson is happy with the fieldwork going ahead on Wednesday 24 June 2020 and will review the addendum as soon as he can.
12-Jun-20	Incoming	Nari Nari/Yitta Yitta	Maria Edwards	Pamela Kottaras	Email	Informing that she will be working with her support worker to respond.
24-Jun-20		Mutthi Mutthi, EMM, Belectric	Taylar Reid	Patsy Winch, Taylar Reid, Terry Devereaux		Fencepost excavation fieldwork.
4-Jul-20	Incoming	Nari Nari/Yitta Yitta	David O'Neill	Pamela Kottaras	Email	From Maria's email address
7-Jul-20	Incoming	Nari Nari/Yitta Yitta	Maria Edwards	Pamela Kottaras	Email	Advice from Maria that her support worker said that direct seeding from the local Native grass & small herbaceous plants could be the best option, most are in seed now, after autumn rain and a mild winter around the sun farm area. Ms Edwards will respond to the draft document soon.
9-Jul-20	Incoming	Representing Maria Edwards	David O'Neill	Pamela Kottaras	Phone	Is Maria Edwards' support worker and is advising Maria on the addendum. He will advise Maria to accept the management measures and suggested natural seeding for the sand dune. I asked him to send me contact details.
27-Oct-20	Outgoing	Heritage NSW	Taylar Reid	Heritage NSW	Email	Sending finalised HMP addendum to Heritage NSW for comment prior to final distribution to RAPs.
27-Oct-20	Outgoing	AHIMS Database	Taylar Reid	AHIMS	Email	Updating LB1 site card with new exclusion zone boundaries and relocated bone fragments.

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