

Objection to Wind Energy Partners approach to Aboriginal Heritage.

I wish to acknowledge and pay respect to the Traditional Owners and Custodians of Country throughout Australia and in particular, the Kamilaroi People, Elders, Past, Present and Emerging, on whose Land the Wind Energy Partners (Engie), propose to build a Wind Farm.

I object to the Wind Energy Partners approach to Aboriginal Heritage for the following reasons:

- 1. No Acknowledgement of Country in the DA.** When a large International Company, Engie, is the Promotor of a Project it is important that they acknowledge and pay respect to the Traditional Owners and Custodians of the Land on which they propose to establish such a large commercial operation. There is no Acknowledgment of the First Nations People in the EIS or in Appendix M. *Acknowledgement* is becoming more widely recognized in published documents. Engie, a foreign Company needs to be sensitive to the places it is investing in. (E.g., See NSW Public Service Website., *Acknowledgement of Country*; *Australian Radiation Protection and Safety Agency Annual Report 2016-2017*)
- 2. Total loss of Value of Aboriginal heritage sites.** The Wind Energy Partners EIS, attribute Total loss of Value and Direct Total Impact to four (4) of the recognized Heritage sites. (EIS Table 14-3. p.293.); *Appendix M*, Table 14-3 p.296.297).
The Social Value of locations, the places where artefacts have been found, is essentially ignored. The physical objects/artifacts are emphasized but the social value of the places where the objects are found, are overlooked, despite the specific comments by Aboriginal representatives during the Consultation process. E.g. Aboriginal people have said that the location is *a highly cultural sensitive area connected to trading tools, food, cultural exchange and ceremonies*, a place associated for centuries with *'ancestral ceremony and trade'*, and where *'more field investigation... as well as cultural assessment* needs to be undertaken;. (App M 6.5, p.32.; 6.6 ,p.33.)
- 3. Qualified recognition.** The Promotors, when giving some recognition to the First Nation People, frequently make **qualifying statements** which have the effect of watering down the importance and value of Aboriginal Heritage, e.g. *Aboriginal Stakeholders have previously expressed that all archaeological sites hold cultural value and significance, regardless of disturbance or low artifact density, and the loss of intrinsic cultural value of impacted sites cannot be offset'*. The report qualifies this fundamental Aboriginal value by saying *However information recovered from mitigation activities is equally valuable(EIS p. ii ,Appendix ii, p.32) (ii) The priority is to avoid harming Aboriginal cultural heritage'* to which is added the qualifier *'where possible'*. (EIS 14.6.2, p296) *The overall construction footprint has also been limited as much as practicable to reduce the cumulative harm to Aboriginal heritage.'* (EIS 14.6.2, p.296). *Practicable* and *Possible* decisions are to be determined by the scale of the project, logistics, and topography.
- 4. Questionable Value Judgements.** *Avoidable* (Animal Habitat) and *unavoidable* impacts (Aboriginal Culture) create a stark contrast.
 - Cave Dwelling Bats: *'breeding habitat' avoided and ' any direct impacts to areas of roost habitat for cave dwelling bats avoided.. (EIS p.88, 91, 156)*
 - Aboriginal Heritage: *'the scale of the Project and complex environmental topography and logistic requirements is likely to make impact unavoidable.* Aboriginal Heritage, it appears, can be harmed because of the Size of the Project, logistics etc .

'some sites of low or moderate significance will be impacted by the Project. (EIS p.293-4. EIS p.358)

5. Conflict of Interest.

- **On-going Consultation.** The DA Proponents make a positive claim about on-going consultation, and then qualify it by saying '***depending on the level of impact and whether the area was assessed as part of the original CHAR.*** (EIS P.293. Consultation, therefore, will depend on the Wind Farm Promotors judgements about level of impact.
- **The Management Plan.** An Aboriginal Heritage Site Map is to be drawn up before any construction begins. This plan is to be created, the DA documents say, ***to the satisfaction of the Wind Energy Partners,***'. Clearly a serious conflict of interest.
- **WEP appointed Archaeologist.** The archaeologist associated with the Project is appointed by the Project owner., creating a real possibility of conflict of interest. (Appendix M,12)

6. **Extensive Land Clearing.** Aboriginal representatives during Consultation requested *more field investigations*. (Appendix M, p. 32). However, before the Archaeologists visited the site and prepared their report, extensive land clearing had been carried out by one of the landowners involved in the proposed Project. It will now be very difficult to locate previously unrecorded sites. The *further field investigations*, requested by the Aboriginal representatives consulted, will be hampered by the clearing already carried out by a landowner. Cleared areas may still yield artefacts, but sites would have been disturbed or destroyed.

7. **An over-riding Principle?** Rio Tinto, an International Company, recently destroyed a 60,000-year-old Aboriginal site in WA. Engie-Wind Energy Partners, an international Company is proposing to *harm* 60,000-year-old Aboriginal sites at Hanging Rock which will lead to their *Total loss of Value*. The scale of damage in these examples is quite different, but the principle is the same: Big International business declaring by their actions, that Aboriginal Heritage should not stand in the way of development and profit.

25/01/2021