



WELLINGTON VALLEY WIRADJURI
ABORIGINAL CORPORATION

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15th March 2025

Tanae Robertson
Project Archaeologist
OzArk Environment & Heritage
PO Box 2069
Dubbo NSW 2830

Re: Draft Aboriginal Cultural Heritage assessment Report (ACHAR) dated February 2025

Dear Tanae,

Wellington Valley Wiradjuri Aboriginal Corporation (WWWAC) would like to thank you for your invitation to provide a response for This Aboriginal Cultural Heritage issue relevant to obligations to protect our Heritage within our Traditional Lands. Wellington Valley Wiradjuri represent traditional families with identified apical ancestry pre European occupation with our known Traditional Lands. We know our culture, country and continue with our association with our traditional lands (Ngurangbang).

Wellington Valley Wiradjuri Aboriginal Corporation (WWWAC) have through consultation with other Traditional Elders and Traditional Community with cultural knowledge have the following comments and or recommendations:

- In regards to the cultural and Anthropological value of sites SNI-AS47 and SNI-AS48 these are of High Significance to us as Aboriginal People and with having Apical Connection to the area through clan descent to our current members. Anthropologically we as Wiradjuri People with continued links to our Apical Clan Lands need to understand more of what was occurring at these sites and a surface collection of cultural material falls short of this, the Elders and Members have insisted that test excavations conducted at these and every other impacted site with Drone Landscape and Contextual mapping conducted that can be shown in photo/video and preserved for future generations.
- The combined Intergenerational Cumulative Loss from the combined onsite disturbance and other external projects that surround and link to this project site is immense, this includes other solar farms, the Renewable Energy Zone Powerline and minor recordings in a report to record a fraction of our Heritage Sites is not good enough, detailed catalogues must be produced to properly record the entire artefact assemblage not just select pieces. 3D modelling not just photographs must be produced to adequately record our cultural material so that it is not lost to future generations. The technology is there, widely available use it. If Developers do not want to spend the small financial costs of doing this then their project is not financially viable or sustainable from the start.

- If a site is to be impacted in any way including partial impacts, this site must be subject to complete surface salvage and a test excavation program at that site must be undertaken, along with the outlined site mapping and other actions indicated. WVVAC traditional Owner Community with Apical Ancestry to the project area and wider district have insisted that this take place. Again there were heated comments to the affect that if Developers do not want to spend the overall small costs of doing this then their project is not financially viable or sustainable from the start and should not be approved.
- WVVAC Members informed of their strong disapproval previously of the Project being restarted, readvertised and additional RAP's being accepted. This should have remained the Original RAP's only.
- WVVAC Members Strongly object to any other non-traditional aboriginal organizations or people taking part in site surveys, consultation and assessments within our defined Traditional Lands. We know who are correct and who is not and **Archaeologists and Developers Refuse to consult Core RAP Groups** in the area to limit their involvement as they use these non traditional outsiders to dilute our input, knowledge and our voice.

These non-traditional people and groups are outsiders under Traditional Lore and have no right to advise on or to be present during consultation or site visits as they do not possess the specific traditional knowledge in relation to these lands or sites. These participants may be indigenous and may live locally within the region however, this still does not give them the right to disregard Traditional Lore and values.

WVVAC make further comment of the section Care and control

- WVVAC recommend and seek that any Aboriginal cultural material obtained through archaeological test pitting, after complete cataloguing, 3D rendering etc. on return be reburied on site close to the relevant areas the material was obtained from in a mutually agreed site with ALL RAPs in an area outside of any development or future impacts.
- WVVAC Traditional Elders, Members and Knowledge Holders do not consent to any RAP groups having control over any cultural material.

WVVAC look forward to further participating in the above project, sharing our knowledge of county and to ensure our Heritage is protected. We trust our response meets your requirements. Please contact WVVAC Directors should you require our assistance to address any Aboriginal issues to support your future plans.

Regards,



Bradley R. Bliss J.P.
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