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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 the fourteen 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).

WWWAC object to any other non-traditional aboriginal organizations or people taking part in site surveys, consultation and assessments within our defined Traditional Lands. 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.

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:

#### **Appendix D ACHAR**

- WWWAC have concerns over the actual spacing of Cultural Heritage Field Officers, as discussions with various Field Officers present including those from other RAP's indicate that the spacing was far greater than the reported 20m.
- WWWAC have concerns over the splitting of RAP's Cultural Heritage Field Officers into two groups in an attempt to cover more area within a short time period. The Cultural Heritage Field Officers should have operated as one group as to mutually verify what is found in the area covered and to ensure adequate survey coverage of the project area.
- WWWAC have concerns around missed artefact sites that may have been present between the Cultural Heritage Field Officers and that fact that the project area was sampled in an almost Due Diligence manner rather than a more comprehensive field survey.
- WWWAC cite issues with the current Wellington Solar Farm where the spacing between Cultural Heritage Field Officers was too great and ground cover impeded the Field Officers from properly identifying cultural artefact sites, which were later found during collection and sub-surface testing phases which prolonged the project by an additional 3 weeks due to the location within the approved area and RAP's forcing the issue that these areas be Recorded, Salvaged and sub surface tested correctly. It is due to this and other projects in recent times where initial surveys were rushed or conducted in a sample methodology to have a 100% project area approved, that

WVWAC raise serious concerns of unrecorded sites future loss through this development without being properly identified, recorded and salvaged.

- WVWAC again would like to indicate that areas close by to this development area have known Cultural Heritage sites and that this Development area is a known to be in our traditional information relating back to the Mudigee Clan as the clan boundary is very close by within this project area. This is a boundary of three Clan areas and is highly culturally significant as meetings took place in and around this project development site.
- WVWAC recommend that all remaining areas of this project development area be surveyed comprehensively with ALL RAP's Field Officers present as 1 large group to ensure adequate survey coverage of the project area. Further archaeological assessment would be required if the proposal activity extends beyond the sampled area assessed in this report. This would include full consultation and involvement with the Registered Aboriginal Parties.
- The Proponent should prepare a Cultural Heritage Management Plan (CHMP) to address the potential for finding additional Aboriginal artefacts during the construction of the Proposed Solar Farm and for the management of known sites and artefacts within the proposal area. The Plan should include the unexpected finds procedure to deal with construction activity which includes the written notification of ALL RAP's within 24hrs of the Unexpected Find. Preparation of the CHMP should be undertaken in consultation with the registered Aboriginal parties.
- Until the project is surveyed to the satisfaction of Traditional Owners and other involved RAP's WVWAC and it's members **DO NOT** support this project being granted approval.

WVWAC 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 WVWAC Directors should you require our assistance to address any Aboriginal issues to support your future plans.

Regards,



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