

**Yarkuwa Indigenous  
Knowledge Centre  
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***Deniliquin Ethenol Plant - Environmental Impact Assessment Submission***

Yarkuwa begins with a position that we support sustainable development in our community. We also maintain the need to protect and value environmental and cultural resources. We welcome the opportunity to continue discussions with the Developers to achieve social and economic benefits for our community.

A further position is that it should be recognised that the Edward River has been gazetted with a dual name of 'Kolety' and should be reflected in all documents that refers to the Edward/Kolety River.

We now make mention of specific issues presented within the EIS.

**Section 18.0 Cultural Heritage**

**18.2.3 Impact Assessment**

Tables - Yarkuwa does agree with formulas that rank significance of our cultural heritage. We believe these to be disrespectful of local culture and inappropriate for assessing development impact. Our position to assess the potential development impact on each location including broader landscape features.

**18.4 Aboriginal Heritage Context**

This statement recognises the subject to be part of the Yorta Yorta language group. We strongly disagree with this statement as there is agreement with Yorta Yorta that their traditional country lies further south of Deniliquin. We accept that this area lies within the traditional lands of shared country of the Wamba Wamba and Perrepa Perrepa Nations.

**18.4.2 Consultation**

This section indicated that no further consultation was require as the original assessment's consultation was deemed sufficient. While this may be the case we find the lack of any formal communication with us as been unethical and again disrespectful. Yarkuwa has always maintained an open engagement process and are disappointed that we were not notified of the final original archaeological recommendation nor that a new process of assessment had taken place.

**18.6.2 Significance Assessment**

Yarkuwa's position is that there is a false separation between scientific and cultural significance assessments. We believe that they must be undertaken in collaboration and that an agreed assessment process be undertaken to assess impact rather than significance.

## 18.7 Table

Refer to previous comment. Note our position is that all cultural landscape features are important and that development impact is the key consideration.

### 18.6.3 Construction Phase Impacts on known heritage

Yarkuwa agrees with the requirement for the development of mitigation measures.

#### Specific comments

CH1 – Agreed

CH2 – While we agree with a process of test excavation, salvage of material will require a Permit to Destroy and this require further consultation. Ares to be negotiated could include an interpretation installation within the public area of the development, a recognition of traditional ownership and cultural landscapes and direct engagement with members of the local Indigenous community the assessment work.

CH3 – We agree that reassessment is required and request that we be present when the assessment takes place.

CH4 – Agreed

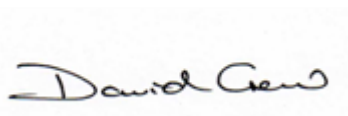
CH5 – Induction and Awareness training must include the involvement of local Indigenous people. Yarkuwa is well placed to provide this element of recommendations.

CH6 – Agreed

CH7 - Agreed

Yarkuwa has major concerns with the methodology that has been undertaken so far in this project. We have been open and available throughout the time of this assess and have participated whenever requests. However this has not been remunerated as agreed with the previous assessment tram and this remains an unresolved issues. We believe there are factual errors within this EIS which we have highlighted and also express disappointed with the lack of engagement. However we are generally supportive of the Cultural heritage Recommendations and look forward to further opportunities to negotiate for a successful outcome for the Deniliquin community.

Signed

A handwritten signature in dark ink, appearing to read 'David Crew', is written over a light blue rectangular background.

David Crew

Manager

5<sup>th</sup> November 2015