

# **Murong Gialinga Aboriginal and Torres Strait Islander Corporation**

C/O PO Box 1097

Mudgee NSW 2850

Ph.: 02 63720859

Email: [muronggialinga@hotmail.com](mailto:muronggialinga@hotmail.com)

***Proud of our Culture***

***Trent Cini***

**Moolarben Coal Operations Pty Ltd  
Locked Bag 2003  
Mudgee 2859 N S W**

Dear Trent,

Murong Gialinga Aboriginal & Torres Strait Islander Corporation would like to thank you for the draft Moolarben UG4 Aboriginal Cultural Heritage Assessment Report.

After discussing we have the following comments /concerns.

- Whilst the report doesn't consider all of the Aboriginal Cultural Heritage is to be of high scientific or cultural significance we consider all of our culture highly important .

- Our community are very concerned about the increasing impacts on Aboriginal Cultural Heritage in our region from the numerous mining projects which have and continue destroyed our cultural heritage.

This modification will add more Aboriginal cultural heritage sites to the ever growing list of those destroyed by mining in our region .We find it very disturbing that one site that is considered of highly scientific value is to be destroyed .When these culturally places are destroyed they are gone for good .

We would recommend that Moolarben make /take all efforts finding an alternative location for the Remote Service Infrastructure to avoid impacts on Site S1MC-230-..

We also recommend that there to be no further works on infrastructure established in the Bora Creek Management area. This area should be avoided due to the Highly cultural and scientific significance.

- We recommend that all areas which will be impacted by the proposed modifications and associated works- including during their construction and operation (such as the water pipeline and any ancillary developments , access roads etc) should be thoroughly surveyed to establish the possibility of Aboriginal Cultural Heritage materials prior to this application for approval of any modifications to the Project Approval for stage 1 of the Moolarben . Coal complex. If these areas are not surveyed, then the actual impact on Aboriginal Cultural Heritage from the project may be underestimated. Before any approval, development or disturbance along the Dewatering Bore and Access track (South) the unsurveyed area of the access track must be surveyed.

We recommend that a fully detailed Aboriginal Cultural Heritage assessment be carried out in all areas which will be impacted by the proposed modifications both during construction and operation of the mine or ancillary infrastructure prior to approval being sought for the modification so that decision are made with the full information present.

- Further to the previous comment we recommend that there is any areas that have not been surveyed as part of the biodiversity assessments which will be impacted during construction or operation of the mine infrastructure as part of the modification then these assessments need to be conducted and included in reports before to the modification Approval being sought. Once again, we feel that informed decision making is essential in the approval process.

. Murong Gialinga strongly disagree with the impact assessment as summarised in Table 18, which states where consequence of harm is assessed as a "partial loss of value" as it anticipated that the sites will be managed (collected and catalogued) under the Moolarben Coal operation Heritage Management Plan, thus salvaging some heritage value and resulting in a partial loss of value .Table 18 itself states that the type of harm is direct and the degree of harm is Total. Even if cultural heritage objects are salvaged and placed in a keeping place, we do not consider the total destruction of those sites will no longer exist-the cultural integrity of those places are destroyed. The impact of the modification on these sites needs to be clearly stated.

. With any management plans for Aboriginal Cultural Heritage there needs to be and make allowances for Aboriginal Cultural Protocols and Practices to be observed-particular in relation to any on country works, additional surveying and salvage works.

.We are greatly concerned about the impacts of the modifications on the groundwater and the Goulburn River Catchment that may be associated with the dewatering bore sites and infrastructure .There needs to be a lot more investigation to ensure that these works will not impact upon the integrity and security of the groundwater system.

We are very worried about the impacts to the environmental and cultural values of "The Drip" which may result from any impacts to the groundwater and Goulburn River Catchment from the works associated with the modifications. This place is culturally significant to the local Wiradjuri people past/present and is particular significance to the local Wiradjuri women.

- We have concerns about the ongoing management of the Aboriginal Cultural Heritage onsite .We do not feel there is consultation with most of the Registered Aboriginal Parties as Murong Gialinga has not had a meeting with Moolarben for well over a year Murong Gialinga have asked for a meeting but to no avail we ask why this is inconsistent with the Heritage Management plan which requires annual meetings as a minimum. . Other mining companies maintain this practice in accordance with their HMPs as part of their approvals. We do not see why moolarben cannot do the same.

In terms of the specific Recommendations 1-8 we have the following comments.

1/For the reason discussed above we strongly disagree with Recommendation1regarding the mitigation

By salvage for site S1MC-230.We feel that mitigation through design needs to be investigated as a first opinion due to the scientific and cultural values of the site.

2/As with recommendation 1 we feel that wherever possible the impact to sites S1MC-278, S1MC-433 and S1MC-434 needs to be avoided through design in terms of the relocation of the Remote Services Infrastructure Area.

3/If our recommendations/concerns are not taken up and destruction of Sites S1MC-278 S1MC-433 S1MC-230 is approved we agree that the process as described in Section 5.5 of the Moolarben HMP must be subsequent to any Modification approval and prior to any activities.

4/We request that an Independent groundwater study is done pre-Modification approval.

5/In terms of recommendation 4 we feel that surveying along the Dewatering Bore Access Track (south) the unsurveyed area of the access track must be done before approval for modification being sought and all the results be included in this report so( if any new sites are identified ).

5/ Murong Gialinga agree with the recommendations 3,5,6,7, and 8.

6/Murong Gialinga reserve the right to make further comments on the full statement of Environment effects with all environmental reports

Murong Gialinga feels this process can be just for show and our comments/concerns fall on deaf ears so we hope we this time we will be taken seriously, and our concerns/ recommendations be considered.

Murong Gialinga would like to thank you once again for the opportunity to comment on thre draft report and look forward to working with Moolarben in the future.

If you need to contact us for any queries, please contact us on 0263720859

Kind Regards  
Debbie Foley  
On behalf of  
Murong Gialinga