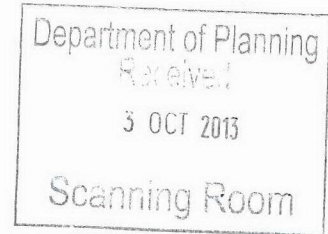


To: NSW Planning and Infrastructure  
GPO Box 39  
Sydney NSW 2001



From: Garigal Aboriginal Community Inc  
PO Box 182  
Gloucester NSW 2422



Dear Mr Freeman

RE: ROCKY HILL COAL PROJECT (ssd 5156)

Thank you for the opportunity to make comments on the Environmental Impact Statement.

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4.10

12.1 An Aboriginal Cultural Management Plan is necessary and should be drafted by a qualified Aboriginal Heritage Manager.

12.2 In response to the proposal of the education of miners for the purpose of the recognition of Aboriginal Culture, there are several reasons why this is a bad idea. This proposal is a "conflict of interest". The reason why the mine wishes this proposal is that it would be cheaper than hiring a qualified person. The Australian Archaeological Association may view the proposal as "Scab Labour", that is doing Archaeologists out of their profession. This is a foolhardy proposition. It is a known fact that a driver cannot see artefacts in front of his excavator bucket.

As from an Aboriginal viewpoint, to teach miners archaeology is likened to giving the enemy a rifle and bullets, so to speak, able to clear the land of any cultural remains, without ever anyone knowing that it was ever there. Our history is written in the land in the form of the archaeological record. To knowingly or unknowingly destroy and or disturb Aboriginal Culture is the same as tearing pages from our history books before they are even recorded and written. We do not trust the miners with our cultural remains

12.3 The problem of concern is the hiring of only one archaeologist to cope with such a large area. We hope that the two previously hired archaeologists will not be employed at this site again given that they were in conflict with the Worimi people on the survey. The conflict was regarding the integrity of the artefacts that were found. We really do not need someone from Armidale coming down here to tell us that our heritage sites have no integrity. What sort of game is the mining company playing? Throughout the Worimi Groups, we have qualified Archaeologists and Aboriginal Heritage Managers who are willing and able to undertake the care and control of their own culture.

12.5 Scraping down to sub-surface to discover artefacts is not how archaeology is applied. Scraping with a grader is the "destruction of the site". This is why miners should not be attempting to do archaeology. We do not know what lies beneath the surface. There is no X ray vision. There maybe sites as old as 60,000 + years BP, like near the Great Walls of China at Lake Mungo. There is the possibility of more recent burials, within the past 200 years are located within the mine area. There are three known individual burials in the area that have not as yet been investigated.

4.10.1 "Low risk" ? The archaeology that is sub-surface should be regarded as "high risk", given the density and distribution of artefacts that are visible on the surface.

4.10.9.1

The bulldozer approach shows little respect for our culture. These areas in particular deserve special attention and should be treated as an "archaeological excavation". These

decisions are best left to an Aboriginal Heritage Manager.

4.10.9.1

Whoever made the determination of "low research potential" knows little about archaeology. It doesn't matter if they are eroding out of B Horizon, they still hold cultural knowledge, even if they are not in-situ. They maybe part of a much larger deposit.

The aim is not to just dig up artefacts and put them somewhere. A great deal of information can be retrieved if salvage work is undertaken carefully. There needs to be an analysis of retrieved contents : faunal remains, stone tools (organic residue and edge wear analysis), dating samples, to mention a few. Following analysis, a write up for publication or publication standard. This area needs to be taken seriously and should be treated in a scientific manner if it is to be disturbed by mining activity.

Yours sincerely

*D. Arnold*  
Delcia R. Arnold BA (Sec)

