

Appendix 11

Aboriginal Heritage Assessment

(Total No. of pages including blank pages = 22)

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18 May 2015

Mitchell Bland
Principal Environmental Consultant
RW Corkery & Co Pty Limited

Dear Mr Bland,

Re: Aboriginal heritage advice on the proposed design modifications (MOD3) at the Dargues Reef Gold Mine, Majors Creek.

This letter report has been prepared by Artefact Heritage at your request in relation to Modification 3 (MOD3) to the design of the Dargues Reef Gold Mine project at Majors Creek. This report was prepared in accordance with the requirements of the Aboriginal Heritage Management Plan (AHMP) prepared for the project (Artefact Heritage 2011) and includes a discussion of additional Aboriginal consultation that was undertaken with the registered Aboriginal stakeholder groups in relation to the proposed modification.

Background

An Aboriginal Heritage Assessment was completed for the Dargues Reef Mine project by Archaeological Surveys & Reports (AS&R) in 2010. The AS&R assessment identified five Aboriginal sites within the project area. Of these, four sites were located outside of the initial disturbance footprint (GT OS2, GT IS3, GT IS4, GT OS5). Site GT OS1 was located in close proximity to the downstream toe of the tailings storage facility embankment. In order to ensure in-situ conservation of this site, the Proponent redesigned the facility slightly to ensure a minimum 20m buffer between the recorded location of the artefact and toe of the embankment.

An unexpected find (GT IS06) was located during soil sampling works to the north of the proposal impact area. This site has been registered with the Aboriginal Heritage Information Management System (AHIMS) and the site card provided to Big Island Mining for incorporation in the Construction Environment Management Plan (CEMP).

In accordance with the Minister's conditions of approval, Artefact Heritage prepared an AHMP for the project site. The registered Aboriginal stakeholders were consulted during preparation of the AHMP.

In 2012 Artefact were engaged to prepare advice on the proposed impacts to GT OS1 and GT OS2 which was to form part of the MOD2 submission. As part of this advice Aboriginal consultation was conducted and recommendations for salvage collection and reburial were made. Subsequently the proposed impacts to these sites were not included in the MOD2 proposed design changes. These design changes have now been included in the MOD3 submission.

It is noted that this report includes information from the previous Artefact Heritage assessment (2012) that was omitted from the MOD3 submission.

Proposed Design Modifications

The following changes to the approved design are proposed as part of MOD3. The MOD3 proposal in relation to the location of recorded Aboriginal sites is shown in Figure 1.

- Storage of waste rock in the proposed Eastern Waste Rock Emplacement.
- Construction of a haul road directly from the box cut to the Tailings Storage Facility and Eastern Waste Rock Emplacement.
- Processing of gold concentrate on site to produce gold bar through the use of a proposed carbon-in-leach processing plant, including the use of cyanide to leach the gold.
- Extension of the life of the Project and the amount of ore to be extracted.
- Construction of a range of infrastructure that would be ancillary to the above.
- A range of minor adjustments to the conditions of MP 10_0054 to further clarify the intent of the conditions.

The specific works that would impact recorded Aboriginal sites are the extension of the toe of the tailings storage facility and the construction of an access track from the box cut to the tailings storage facility.

Site survey

The study area was surveyed and assessed by archaeologist John Appleton (AS&R) and representatives from the local Aboriginal community in 2010. Five Aboriginal sites were recorded (GT OS1, GT OS2, GT IS3, GT IS4, GT OS5).

In June 2011 Artefact was called out to an unexpected find at the site. The isolated artefact (GT IS6) was located in sandy topsoil between 20cm and 30cm below the surface during soil testing. The auger hole was approximately 20cm in diameter and was stopped when the artefact was noticed (at between 20 and 30cm depth). The soil profile revealed by the auger hole suggests that the area has minimal subsurface disturbance and that the A horizon that may yield archaeological material is at least 30cm deep. The area surrounding the find has been assessed as an area of potential archaeological deposit. It is in a position with good views, in relatively close proximity to water and on a flat terraced area near the top of a ridge line.

Dr Sandra Wallace (Artefact Heritage) visited the Dargues Reef mine site on 5th October 2011 in order to revisit he recorded sites as part of the MOD2 assessment. Bunja Smith (Batemans Bay Local Aboriginal Land Council) was also present. The five previously recorded sites were located and re-recorded. Artefacts at two of the sites (GTOS1 and GTIS5) could not be located as thick grass has grown over the areas since the 2010 archaeological survey. Artefacts at three of the sites (GTOS2, GTOS3 and GTOS4) were located and a number of additional artefacts were recorded at GTOS4. Site card updates have been prepared and were lodged with the Aboriginal Heritage Information Management System (AHIMS) in 2011.

Table 1: Aboriginal Sites recorded at Dargues Reef in 2010.

| Site | AHIMS | Co-ordinates (GDA 55H) | Artefacts recorded in May 2010 | Artefacts recorded in October 2011 |
|---------------|-----------|--|---|---|
| GT OS1 | 57-6-0469 | E 749234 N 6063113 (N) E 749239 N 6063061 (S) | Silcrete flake, core and metasedimentary flake | Not found |
| GT OS2 | 57-6-0467 | E 748937 N 6063149 | Metasedimentary flake and metasedimentary core/scrapper | Metasedimentary core/scrapper |
| GT IS3 | 57-6-0470 | E 748838 N 6063624 | Quartz flake | Quartz Flake |
| GT OS4 | 57-6-0468 | E 748840 N 6063315 | Chert flake, quartz flake and silcrete flake | Two silcrete flakes, three quartz flakes and one quartzite flake piece. |
| GT IS5 | 57-6-0466 | E 749011 N 6061824 | Silcrete flake | Not found |

Impacts to Aboriginal heritage

The MOD3 proposal would involve direct impacts to Aboriginal sites GT OS1 and GT OS2. It is understood there would be no impacts to the other recorded Aboriginal sites in the study area.

GT OS1 (AHIMS # 57-6-0469)

GT OS1 is located on an upper slope of the toe of a spur facing south. The three artefacts were observed in the spoil heaps at the edge of drill pad at two locations approximately 50 meters apart.

Site location: E 749234 N 6063113 (N) and E 749239 N 6063061 (S)

GT OS1 was assessed as having a low archaeological significance as it is located in a disturbed context (Figures 1 and 2).

The proposed modifications would result in a direct impact to GT OS1 due to the extension of the tailings storage facility. The options for location of the extension of the tailings storage facility are limited therefore the conservation of the site impractical.

Figure 1: GT OS1 (north) location.



Figure 2: GT OS1 (south) location.



GT OS2 (AHIMS # 57-6-0467)

GT OS2 is located on a stock track across a dam. The site comprises of two artefacts.

Location: E 748937 N 6063149

GT OS2 was assessed as having a low archaeological significance as it is located in a disturbed context (Figures 3 and 4).

The proposed modifications would result in direct impacts to GT OS2 due to the construction of the road across the existing dam wall, where the artefacts were located. The dam provides the most practical location for the construction of the road across the low point.

The proponent considered a range of locations for the Spring Creek crossing (see a full discussion in section 2.10.6 of the EA). However, the proposed location was selected because it provided the most suitable approaches to the crossing. The proposed location also limited the amount of disturbance that would be required to construct the crossing. Alternative locations would have required substantial additional disturbance both within the creek and along the banks of the creek to construct suitable approaches.

Figure 3: GT OS2 artefact.



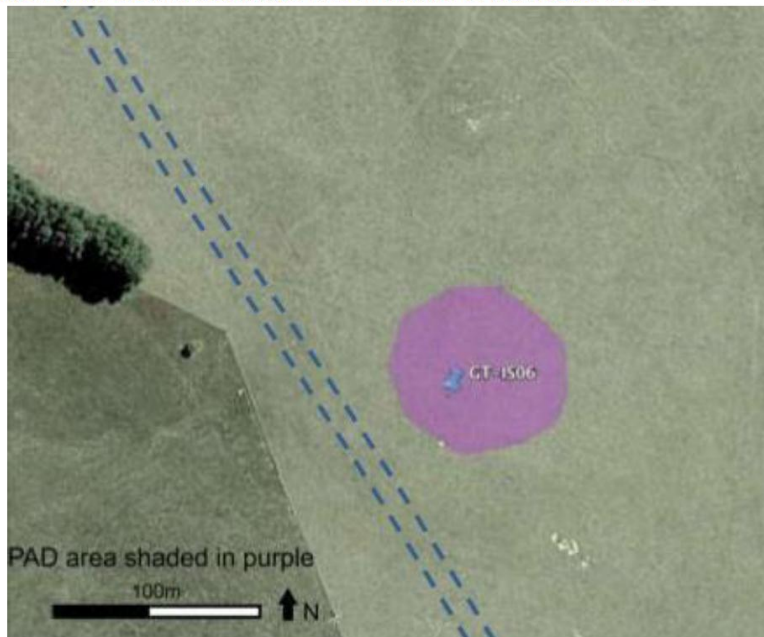
Figure 4: GT OS2 location.



GT IS6 (AHIMS # 57-6-0469)

GT IS6 would not be impacted by the proposed works. The extent of the PAD was assessed by Artefact Heritage based on landform and is confined to the small terrace area near the crest of the ridgeline. An access road has been constructed to the south of the PAD (Figures 1 and 5) and the Proponent advises that the PAD has been fenced off to prevent inadvertent disturbance.

Figure 5: Location of GT IS6 and associated PAD in relation to the access track



Aboriginal stakeholders

A list of Aboriginal stakeholders was compiled by AS&R during the archaeological assessment. These stakeholders were contacted by Artefact Heritage during consultation for the AHMP. An additional stakeholder was also identified during the Planning Commission for the project and added to the stakeholder list by Artefact Heritage. The registered stakeholder list for the project is currently as follows:

- Ngunnawal Elders Corporation;
- Ngunnawal Heritage Aboriginal Corporation;
- Buru Ngunawal Aboriginal Corporation Traditional Carer Group;
- Konanggo Aboriginal Cultural Heritage Services;
- Yurwang Gundana Consultancy Cultural Heritage Services;
- King Browns Tribal Group Pty Ltd;
- Yukembruk Merung Ngarigo Consultancy Pty. Ltd. (formerly Bega Traditional Elders Council);
- Walbunja Aboriginal Corporation;
- Batemans Bay LALC;
- Little Gudgenby River Tribal Council.
- Mogo Local Aboriginal Land Council

Aboriginal consultation

Aboriginal consultation was completed in accordance with the AHMP and OEH guidelines.

All Aboriginal stakeholders were contacted by letter on the 12 June 2012 and provided with a copy of a letter report outlining the proposed impacts to GT OS1 and GT OS 2. The letter provided a background for the project, outlined the proposed design modifications, discussed impacts to sites GT OS1 and GT OS2, requested comment on the proposed impacts, and requested comment on the reburial or curation of the Aboriginal objects located at GT OS 1 and GT OS2.

All groups were contacted to make sure they had received the letter (19 June 2013) and those that had not forward a response were contacted again to obtain a verbal response or request comment (26 June – 1 July 2013). A summary table of the results of the consultation is included below. The consultation log with details of contact and comments is attached as Appendix B.

Table 2: Stakeholder responses

| Stakeholder group | Contacted? | Comment on impacts to GT OS1 and GT OS 2 | Comments on reburial/curation of artefacts |
|--|---|--|---|
| Ngunnawal Elders Corporation; King Browns Tribal Group Pty Ltd | Yes, received letter | No objections noted. | Would prefer reburial outside the impact area. |
| Ngunnawal Heritage Aboriginal Corporation | Yes, received letter | Agreed with collection as a mitigation measure. | Would prefer reburial outside the impact area. Would prefer reburial in natural fibre, not a plastic box. |
| Buru Ngunawal Aboriginal Corporation Traditional Carer Group | Yes, received letter | Would like test excavations conducted at sites GT OS1 and GT OS2. If excavations were not conducted monitoring by the Aboriginal groups should take place during construction. | Would prefer reburial outside the impact area |
| Konanggo Aboriginal Cultural Heritage Services | Yes, received letter | No objections noted. | Would prefer reburial outside the impact area |
| Yurwang Gundana Consultancy Cultural Heritage Services | Contact could not be made. | n/a | n/a |
| Yukembruk Merung Ngarigo Consultancy Pty. Ltd. (formerly Bega Traditional Elders Council) | Informed by OEH that the group is no longer in existence. | n/a | n/a |
| Walbunja Aboriginal Corporation | Yes, received letter | No comments received | No comments received |
| Batemans Bay LALC | Yes, received letter | No comments received | No comments received |
| Little Gudgenby River | Yes, received | No objections noted. | Preference for artefacts to be |

| Stakeholder group | Contacted? | Comment on impacts to GT OS1 and GT OS 2 | Comments on reburial/curation of artefacts |
|---|----------------------|--|--|
| Tribal Council | letter | | stored at the LALC but wanted to contact LALC before confirming this position. |
| Mogo Local Aboriginal Land Council | Yes, received letter | No comments received | No comments received |

In general the Aboriginal stakeholders did not express objections to the proposed impacts to GT OS1 and GT OS2. Buru Ngunawal commented that they would support test excavations at the sites, or if test excavations were not conducted, the Aboriginal stakeholder should monitor the works. This comment was passed into the client for consideration.

The majority of stakeholders that commented expressed their preference that objects to be impacted were collected and reburied on site in a location which would not be impacted by the mine. The Ngunawal Heritage Aboriginal Corporation commented that they would prefer the artefacts were reburied in natural fibres such as hessian or bark, instead of a plastic box.

Mitigation strategies

Section 3.4.2 of the AHMP states that:

If impact to a known site cannot be avoided further mitigation will be required. These mitigation strategies should be formulated through consultation with registered Aboriginal stakeholders and OEH. Mitigation strategies could include:

- *Collection of objects;*
- *Further archaeological investigation, example Test Excavation.*

It is recommended that recording and collection of the Aboriginal objects at sites GT OS1 and GT OS2 prior to impacts is the most appropriate mitigation strategy. Test excavations are not warranted as both sites were assessed as being of low archaeological significance, and are located in disturbed contexts (i.e. where topsoil which usually comprises the artefact bearing deposit has been disturbed).

A site impact form would be prepared for GT OS1 and GT OS2 after collection, and submitted to AHIMS.

The collected objects would either be stored at a place agreed to by the majority of stakeholders or would be reburied in a section of the project area that would not be impacted. The Aboriginal stakeholders were consulted about the proposed mitigation measures and curation/reburial of artefacts.

Subsurface testing is not recommended at GT OS1 and GT OS2. Both sites are in highly disturbed contexts and would not retain intact archaeological deposit.

Recommendations

The proposed modifications would impact two previously recorded Aboriginal sites (GT OS1 and GT OS2). As such, the provisions of the AHMP have been followed, with the Aboriginal stakeholders consulted regarding the proposed impacts and the curation/reburial of the objects.

It is recommended that a copy of this report is forwarded to the stakeholders for their information. As the impacts are the same as previously discussed during Aboriginal consultation it is recommended that a further consultation period is not required.

If the modifications are approved it is recommend that a representative from each of the stakeholder groups is invited to attend the site to collect and rebury the artefacts.

The reburial location should be in an area that will not be impacted by the mine into the future and the artefacts should reburied in a natural fibre. An AHIMS site recording form would be prepared for the location of the reburial, and it would be registered as an Aboriginal site with OEHL.

Site impact forms would be prepared for GT OS1 and GT OS2 notifying OEHL of their destruction.

The AHMP should be updated to include to reflect this report and to include the reburial location as an Aboriginal site so that unintentional impacts are avoided.

If unexpected Aboriginal objects are located during the proposed modification, works should cease in the vicinity of the find and the provisions of the AHMP should be followed.

Please do not hesitate to contact me if you have any queries or require further information and I would be happy to advise.

Kind regards,

Dr Sandra Wallace



Principal Archaeologist
Artefact

E: sandra.wallace@artefact.net.au

P: 02 9025 3958

M: 0403 565 086

W: www.artefact.net.au

A: Level 4, Building B, 35 Saunders Street, Pyrmont.

Appendix A: Aboriginal consultation log

Dargues Reef Consultation Log

| Contact / Organisation | Contacted By / Organisation | Method | Date / Time | Comments |
|--|-----------------------------|--------|--------------|--|
| Ngunnawal Elders Corporation - Arnold Williams | Artefact/ Sandra Wallace | Letter | 12 June 2013 | Sent letter discussing proposed design changes and requesting feedback on this and reburial location/ keeping place. Also sent copy of AHMP. |
| Ngunnawal Heritage Aboriginal Corporation- Dean Delponte | Artefact/ Sandra Wallace | Email | 12 June 2013 | Sent letter discussing proposed design changes and requesting feedback on this and reburial location/ keeping place. Also sent copy of AHMP. |
| Buru Ngunawal Aboriginal Corporation Traditional Carer Group - Wally Bell | Artefact/ Sandra Wallace | Email | 12 June 2013 | Sent letter discussing proposed design changes and requesting feedback on this and reburial location/ keeping place. Also sent copy of AHMP. |
| Konanggo Aboriginal Cultural Heritage Services - Robert Young | Artefact/ Sandra Wallace | Email | 12 June 2013 | Sent letter discussing proposed design changes and requesting feedback on this and reburial location/ keeping place. Also sent copy of AHMP. |
| Yurwang Gundana Consultancy Cultural Heritage Services - Dean Bell | Artefact/ Sandra Wallace | Email | 12 June 2013 | Sent letter discussing proposed design changes and requesting feedback on this and reburial location/ keeping place. Also sent copy of AHMP. |
| King Browns Tribal Group Pty Ltd - Tina Brown | Artefact/ Sandra Wallace | Email | 12 June 2013 | Sent letter discussing proposed design changes and requesting feedback on this and reburial location/ keeping place. Also sent copy of AHMP. |
| Yukembruk Merung Ngarigo Consultancy Pty. Ltd. (formerly Bega Traditional Elders Council) - John Dixon | Artefact/ Sandra Wallace | Email | 12 June 2013 | Sent letter discussing proposed design changes and requesting feedback on this and reburial location/ keeping place. Also sent copy of AHMP. |
| Walbunja Aboriginal Corporation - Shane Carriage | Artefact/ Sandra Wallace | Email | 12 June 2013 | Sent letter discussing proposed design changes and requesting feedback on this and reburial location/ keeping place. Also sent copy of AHMP. |
| Batemans Bay LALC – Bunja Smith | Artefact/ Sandra Wallace | Email | 12 June 2013 | Sent letter discussing proposed design changes and requesting feedback on this and reburial location/ keeping place. Also sent copy of AHMP. |
| Little Gudenby River Tribal Council - Matilda House | Artefact/ Sandra Wallace | Letter | 12 June 2013 | Sent letter discussing proposed design changes and requesting feedback on this and reburial location/ keeping place. Also sent copy of AHMP. |
| Ngunnawal Heritage Aboriginal Corporation – Dean Delponte | Artefact/ Georgia Wright | Phone | 19 June 2013 | Dean has received email about the proposed design changes and has noted the due date for comments. Dean will email comments to Sandra. |
| Buru Ngunawal Aboriginal Corporation Traditional Carer Group – Wally Bell | Artefact/ Georgia Wright | Phone | 19 June 2013 | Left message on answering machine. Noted the call was in regard to the Dargues Reef project. |
| Batemans Bay LALC | Artefact/Georgia Wright | Phone | 19 June 2013 | Spoke to Alicia. Bunja no longer works with the LALC. The LALC received the letter and it will be passed onto the Chairman. Alicia noted the due date for responses. |
| Ngunnawal Elders Corporation – Arnold Williams | Artefact/ Georgia Wright | Phone | 19 June 2013 | Number has been disconnected. |
| Konanggo Aboriginal Cultural Heritage Services – Robert Young | Artefact/ Georgia Wright | Phone | 19 June 2013 | Number has been discontinued. |

| Contact / Organisation | Contacted By / Organisation | Method | Date / Time | Comments |
|--|---------------------------------|--------|--------------|---|
| Yurwang Gundana Consultancy Cultural Heritage Services – Dean Bell | Artefact/Georgia Wright | | 19 June 2013 | No contact details available. |
| King Browns Tribal Group Pty Ltd – Tina Brown | Artefact/Georgia Wright | Phone | 19 June 2013 | Incorrect number. |
| Yukembruk Merung Ngarigo Consultancy – John Dixon | Artefact/ Georgia Wright | Phone | 19 June 2013 | Number has been discontinued. |
| Walbunja Aboriginal Corporation – Shane Carriage | Artefact/ Georgia Wright | Phone | 19 June 2013 | Left message on answering machine. Noted the call was in regard to the Dargues Reef project. |
| Little Gudenby River Tribal Council | Artefact/ Georgia Wright | | 19 June 2013 | No contact details available. |
| Yukembruk Merung Ngarigo Consultancy | Artefact/ Georgia Wright | | 24 June 2013 | Informed by OEH (Jackie Taylor, Queanbeyan office) that this group is no longer operating. |
| Ngunnawal Elders Corporation - Arnold Williams | Artefact/ Georgia Wright | Phone | 25 June 2013 | Arnold has received letter about the proposed design changes and noted the due date for comments. Arnold will email comments to Sandra. |
| Konanggo Aboriginal Cultural Heritage Services - Robert Young | Artefact/ Georgia Wright | Phone | 25 June 2013 | Robert recalls receiving the letter but has misplaced it. Robert recalls the job and would like the artefacts to be kept on Country but outside of the impact area. After reading the letter again, Robert will email Sandra with any further comments. |
| King Browns Tribal Group - Tina Brown | Artefact/ Georgia Wright | Phone | 25 June 2013 | Left message on answering machine. Noted the call was in regard to the Dargues Reef project. |
| Walbunja Aboriginal Corporation | Artefact/ Georgia Wright | Phone | 25 June 2013 | Left message on Talia's answering machine (contact number from OEH). Noted the call was in regard to the Dargues Reef project. |
| Little Gudenby River Tribal Council – Matilda House | Artefact/ Georgia Wright | Phone | 25 June 2013 | Matilda has received our letter about the proposed changes and has noted the due date for comments. Matilda will email comments to Sandra. |
| Buru Ngunawal Aboriginal Corporation Traditional Carer Group – Tyrone Bell | Artefact/ Georgia Wright | Phone | 25 June 2013 | Wally forwarded letter to Tyrone Bell. Tyrone has noted the due date for comments and will email these to Sandra. Tyrone has concerns about how much of the initial project area was surveyed. |
| Yurwang Gundana Consultancy Cultural Heritage Services | Artefact/ Georgia Wright | Phone | 25 June 2013 | Left message on answering machine (contact number from OEH). |
| Konanggo Aboriginal Cultural Heritage Services - Robert Young | Artefact/ Georgia Wright | Email | 25 June 2013 | Re-sent letter about the proposed design changes. |
| Artefact/ Sandra Wallace | Walbunja Aboriginal Corporation | Phone | 25 June 2013 | Received letter. Asked whether there would be salvage excavations, which he was informed there would not. |

| Contact / Organisation | Contacted By / Organisation | Method | Date / Time | Comments |
|--|--|--------|--------------|--|
| Artefact/ Georgia Wright | King Browns Tribal Group - Tina Brown | Phone | 25 June 2013 | Tina has received the letter and noted the due date for comments. Tina will email comments to Sandra. |
| Sandra Wallace/ Artefact | Ngunawal Heritage Corporation - Dean Delponte | Email | 26 June 2013 | Noted that the mitigation measure proposed (collection of artefact prior to impacts) is accordance with the organisations views. Noted that the site may require monitoring during earthworks. Also noted the organisations support for reburial of collected artefacts in an area that will not be impacted and in a natural environment. In the event of reburial the organisation prefers the use of natural fibre (hessian bag) or other natural materials (bark, leaves) as opposed to plastic. |
| Sandra Wallace/ Artefact | Buru Ngunawal Aboriginal Corporation Traditional Custodian Group - Tyrone Bell | Email | 26 June 2013 | Having read the proposed design changes, the organisation recommended archaeological test excavations within impacted sections of the PADs associated with GT OS1 and GT OS2. If test excavations are not agreed on the organisation recommended monitoring in these areas. The organisations preference is for artefacts to be recovered and buried at Dargues Reef in a conservation area. |
| Ngunnawal Elders Corporation - Arnold Williams | Georgia Wright/ Artefact | Phone | 1 July 2013 | Arnold commented that his preferred option is that the artefacts are collected and reburied in an area that would not be impacted by the development. |
| Konanggo Aboriginal Cultural Heritage Services – Robert Young | Georgia Wright/ Artefact | Phone | 1 July 2013 | Number unavailable. Text message sent with number I called from via automatic answering machine. |
| Yurwang Gundana Consultancy Cultural Heritage Services – Dean Bell | Georgia Wright/ Artefact | Phone | 1 July 2013 | Left message on answering machine. |
| King Browns Tribal Group – Tina Brown | Georgia Wright/ Artefact | Phone | 1 July 2013 | Tina hasn't had a chance to read over the proposed changes. She will have a look over the letter and if she can, send something through or give a verbal comment over the phone tomorrow morning. |
| Walbunja Aboriginal Corporation | Georgia Wright/ Artefact | Phone | 1 July 2013 | Left message on Talia's answering machine (contact number from OEH). |
| Little Gudenby River Tribal Council – Matilda House | Georgia Wright/ Artefact | Phone | 1 July 2013 | Hasn't read the letter and would like to confer with the Batemans Bay Land Council about the proposed changes. Preference is for the recovered artefacts to be stored with the Land Council. |
| Batemans Bay LALC | Georgia Wright/ Artefact | Phone | 1 July 2013 | Alicia passed on the letter last week. There is a Land Council meeting tonight and she will raise it there and send comments through or give a verbal comment over the phone tomorrow morning. Noted that I had spoken with Matilda House and that she asked I send the letter through to Land Council. The Land Council have a copy of the letter and will take it to the meeting tonight. |

Appendix B: Aboriginal stakeholder written comments



BURU NGUNAWAL ABORIGINAL CORPORATION



ABN : 24 059 704 833

28 June 2013

Dr Sandra Wallace
Principal Archaeologist
Artefact
PO Box 772
ROSE BAY NSW 2029

Attention: Dr Sandra Wallace

Dear Sandra

Re: Dargues Reef Gold Mine - Additional Aboriginal Consultation

Thank you for your email of 13 June 2013, advising of the above Additional Aboriginal Consultation at Dargues Reef Gold Mine, and requesting input from Buru Ngunawal Aboriginal Corporation (BNAC).

As the Traditional Carers for the area known as Ngunawal, we wish to acknowledge the assistance of the other groups with an interest in Cultural Heritage issues on Ngunawal Country.

Having read the proposed design changes documentation, BNAC wish to make the following recommendations for works that will impact Aboriginal sites:

- That an archaeological subsurface testing program should be conducted within the affected sections of the PADS associated with sites GT OS1 and GT OS2.

This program should aim to:

- Determine the extent and nature of the deposits to be disturbed by construction of the Mine Site;
- Characterise the nature of any archaeological deposits encountered (within the limitations of the sampling and processing methodology);
- Identify the need for any further archaeological work, such as salvage excavation; and
- Provide, if necessary, any appropriate management and mitigation recommendations.

PO Box 6900, CHARNWOOD ACT 2615 Ph: 02 62591672 Fax: 02 6258 1264 Email: walbell@bigpond.net.au

If subsurface testing program is not agreed, BNAC propose an Aboriginal monitoring program in GT OS1 and GT OS2.

Agreement to the Aboriginal Cultural Heritage Assessment is based on the understanding that these additional requirements are accepted, otherwise alternative arrangements will need to be negotiated.

BNAC's preference is that the artefacts recovered be buried at the Dargues Reef Gold Mine site in a conservation area.

Thank you for the opportunity to provide comment. We look forward to working with you on this project.

If you have any queries, please do not hesitate to contact Walter on the number below, or by email, or myself on 0407 517844.

Yours faithfully



Tyrone Bell
Director/Senior Sites Officer



245 Ash Road
PRESTONS NSW 2170
Ph: 0412 176 081
Fx: 07 5630 8597
ngunawalhac@gmail.com
ICN 4755
ABN 31494344309

27 June 2013

Sandra Wallace
Artefact Heritage
PO Box 772
Rose Bay NSW 2029

Re: Dargues Reef Gold Mine – Additional Aboriginal consultation

Dear Sandra,

Thank you for your recent correspondence regarding proposed changes to the development design for the Dargues Reef Gold Mine and allowing us to provide comment.

As this project will now invariably impact on Aboriginal heritage the importance in involving Aboriginal communities in all aspects of consultation is paramount. Aboriginal heritage sites/artefacts are often at risk from impacts through development of infrastructure by construction and mining activities.

The mitigated measures proposed (artefacts removed prior to impacts) to address the impacts to GT OS1 and GT OS2 due to the design changes are in accordance with our organisations views.

Further Mitigation - Monitoring of Earthworks

With consideration to disturbance - GT OS1 and GT OS2 may require monitoring of earthworks due to their site descriptions being on the crest of the head of a spur and across from a dam associated with Dargues Reef.

Repatriation of Artefacts

It is our stated intention to support the reburial of the artefact material to a suitable location that will not be impacted by any future works and that the location is situated in a natural environment away from any nearby built infrastructure.

Methodology for Reburial

In the event of artefact reburial we do not accept or support artefacts reburied in plastic as it is culturally unacceptable. We do however; support the use of a natural fibre (hessian bag) or other natural material (bark, leaves) as a much preferred option that is more culturally appropriate to us and to the natural environment. The recording of this reburial site is to be as stated in the correspondence.

Updated Information and Aerial Map for GT IS6

We request to be provided with further information on the additional Aboriginal site (GT IS6) as we do not know what has been identified at this site and also an updated copy of the aerial map depicting the location of GT IS6.

Avoidance of any Aboriginal Heritage Sites will always provide the best outcome



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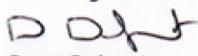
Correction on Consultation Log of Final AHMP

There is an error in the consultation log with Dean Bell placed as our contact person (see below). Please be advised that Mr Bell has no affiliation with the Ngunawal Heritage Aboriginal Corporation. The contact person for this organisation is Dean Delponte. Please be aware of this error for all future correspondence.

| | | | | |
|---------|-------|-----------|-------------------|-------------------|
| 19/5/11 | email | Dean Bell | Ngunawal Heritage | Response received |
|---------|-------|-----------|-------------------|-------------------|

Ensuring that the management measures are implemented for this Project and maintained as outlined in the correspondence then best practice and a positive outcome for all parties involved can be achieved.

We look forward to continually working with you on this project and if you require any further information please do not hesitate to contact me.

Kind Regards

 Dean Delponte
 Director

Avoidance of any Aboriginal Heritage Sites will always provide the best outcome

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