



View east across the south of the Project Area.

ABORIGINAL CULTURAL HERITAGE MANAGEMENT PLAN

WYALONG SOLAR FARM

1409 NEWELL HIGHWAY, WYALONG NSW

DECEMBER 2021

Report prepared by
OzArk Environment & Heritage
for Mytilineos

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Acknowledgement

OzArk acknowledge Traditional Owners of the area to which this plan applies and pay respect to their beliefs, cultural heritage, and continuing connection with the land. We also acknowledge and pay respect to the post-contact experiences of Aboriginal people with attachment to the area and to the elders, past and present, as the next generation of role models and vessels for memories, traditions, culture and hopes of local Aboriginal people.

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1 INTRODUCTION

This Aboriginal Cultural Heritage Management Plan (ACHMP) for the Wyalong Solar Farm (herein referred to as the Project) has been prepared by OzArk Environment & Heritage (OzArk) on behalf of Mytilineos (the Proponent).

The Project, approved as State Significant Development (SSD) 9564 on 7 May 2019, comprises a solar farm which will be located at 1409 Newell Highway, Wyalong within land parcel Lot 160 DP750615. The Project Area is approximately seven kilometres (km) northeast of West Wyalong (**Figure 1-1**).

1.1 GLOSSARY

ACHAR	Aboriginal Cultural Heritage Assessment Report
ACHCRs	<i>Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i>
ACHMP	Aboriginal Cultural Heritage Management Plan
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
ASIRF	Aboriginal Site Impact Recording Form
Code of Practice	Code of Practice for Archaeological Investigation of Aboriginal objects in NSW
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EMS	Environmental Management System
Impact footprint	Approved area of disturbance shown on Figure 6-1
LALC	Local Aboriginal Land Council
NPW Act	<i>National Parks and Wildlife Act 1974</i>
RAP	Registered Aboriginal Party
SSD	State Significant Development

1.2 SCOPE

This ACHMP has been prepared as a tool to give consideration to and to manage Aboriginal heritage related issues during the construction and operation of the Project. It will be used by all Project employees, contractors, sub-contractors, and visitors as the first point of reference for Aboriginal cultural heritage related issues.

This ACHMP synthesises the recommendations made during the preparation of an Environmental Impact Statement (EIS) for the Project, and subsequent assessment and approval of SSD-9564 (**Section 2**).

1.3 PURPOSE

The primary purpose of the ACHMP is to define management of Aboriginal heritage values in accordance with the Development Consent (refer to **Section 2** and **Table 2-1**). In order to achieve this, the ACHMP:

- details the management procedures for known Aboriginal heritage within the Project Area
- details reporting requirements
- outlines and describes ongoing Aboriginal consultation
- outlines the obligations of construction personnel to protect Aboriginal sites
- describes the roles and responsibilities of project staff in managing Aboriginal heritage sites before and after salvage works
- provides for continuous improvement through auditing and modification of the ACHMP.

1.4 PROJECT OVERVIEW

The Project, approved as SSD-9564, comprises a utility scale renewable energy project which aims to generate up to 130 MW of electricity. The solar farm will consist of up to 350,000 solar photovoltaic (PV) modules, known more commonly as PV modules or solar panels. The panels will be mounted in rows on horizontal tracking or fixed tilt systems.

1.5 MYTILINEOS'S ENVIRONMENTAL MANAGEMENT DOCUMENTATION

Mytilineos has developed an Environmental Management Strategy (EMS) for the Project, which is the overarching document in Mytilineos's environmental management system. The EMS includes a number of plans and strategies that that has been put in place to manage environmental impacts that may arise from the construction and/or operation of the project – including this ACHMP.

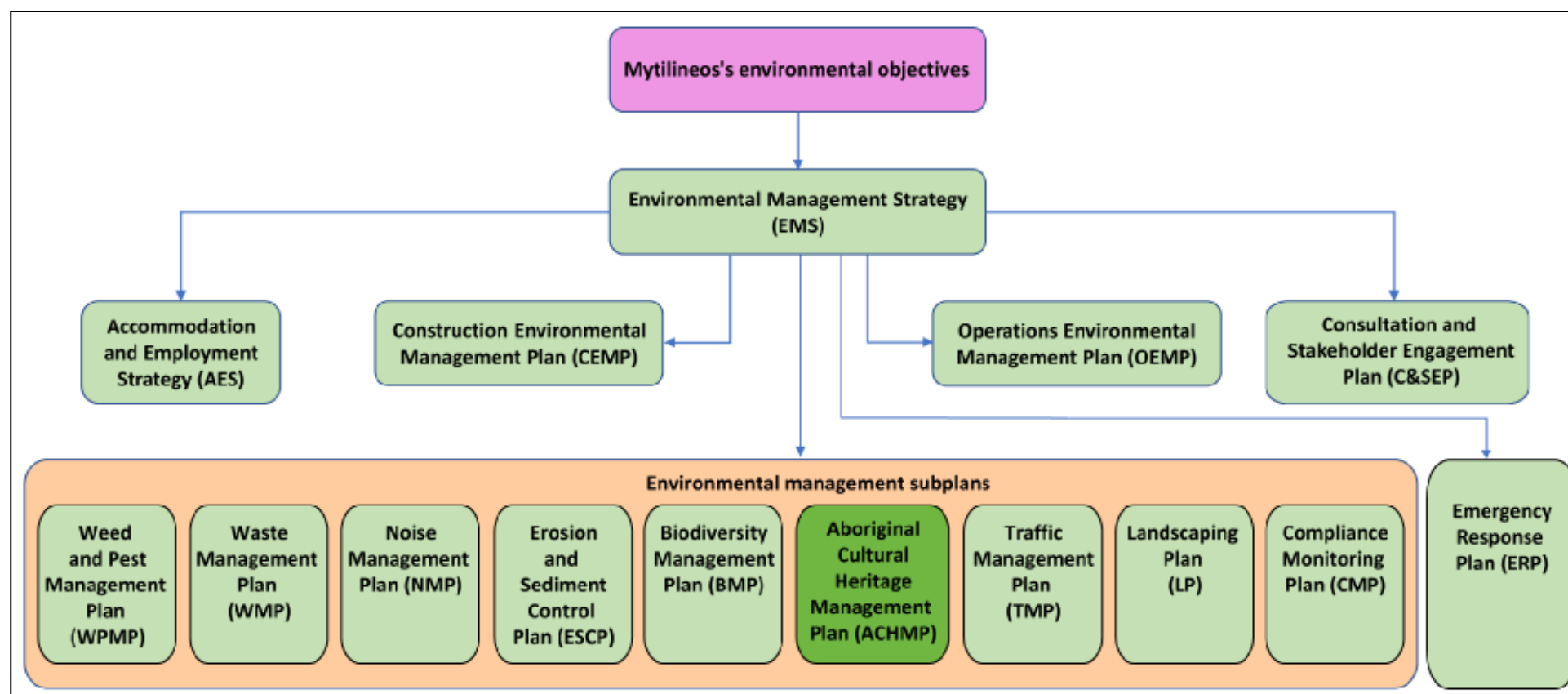
The Proponent will carry out the Project in accordance with the EIS and in accordance with the consent conditions outlined in **Table 2-1** and detailed throughout this ACHMP.

Figure 1-2 shows the ACHMP and the other management plans.

Figure 1-1: Location map of the Project Area.



Figure 1-2: Project environmental management documentation.



2 LEGAL AND OTHER REGULATORY REQUIREMENTS

2.1 PROJECT CONSENT CONDITIONS

The Project is an SSD and an EIS was completed (Accent Environmental Pty Ltd 2018) in accordance with the *Environmental Planning and Assessment Regulation 2000* to assess the environmental impacts (including Aboriginal cultural heritage) of the Project Area.

Development Consent SSD-9564 was granted from the Minister for Planning on 7 May 2019, with *Schedule 3: Condition 19* requiring the preparation of an ACHMP. **Table 2-1** identifies all the conditional requirements relating to Aboriginal heritage and identifies where in the ACHMP individual requirements have been addressed.

Appendix 1 includes a copy of the 'relevant conditions' for which this ACHMP provides measures to ensure compliance, namely *Condition 17 to 19*.

Table 2-1: Conditional requirements of SSD-9564 for an ACHMP.

Schedule	Condition	Section in this ACHMP
2	1. In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.	Section 5.2.4
	2. The Applicant must carry out the development: (a) generally in accordance with the EIS; and (b) in accordance with the conditions of this consent.	Section 1.5
3	17. The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 3 of the Development Consent or located outside the approved development footprint.	Section 6.1.2
	18. The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 2 of Appendix 3. If impacts on these items cannot be avoided, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location on site, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010), or its latest version.	Section 6.1
	19. Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary; (b) be prepared in consultation with the Office of Environment and Heritage (now Heritage NSW) and Aboriginal Stakeholders; (c) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> protecting the Aboriginal heritage items identified in Table 1 in Appendix 3 or outside the approved development footprint, including fencing off the Aboriginal heritage items prior to commencing construction and/or pre-construction minor works; salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 2 in Appendix 3, if impacts to these items cannot be avoided; a contingency plan and reporting procedure if: - previously unidentified heritage items are found; or - Aboriginal skeletal material is discovered; ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and 	a) Section 3.1 b) Section 3.1 and 3.2 c) Section 6

Schedule	Condition	Section in this ACHMP
	<ul style="list-style-type: none"> ongoing consultation with Aboriginal stakeholders during the implementation of the plan; <p>(d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.</p> <p>Following the Secretary's approval, the Applicant must implement the Heritage Management Plan.</p>	d) Section 6.3
4	<p>2. The Applicant must:</p> <p>(a) update the strategies, plans or programs required under this consent to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site; and</p> <p>(b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Secretary within 1 month of the:</p> <ul style="list-style-type: none"> submission of an incident report under condition 4 of Schedule 4; submission of an audit report under condition 7 of Schedule 4; or any modification to the conditions of this consent. <p>4. The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident.</p> <p>5. The Department must be notified in writing to compliance@planning.nsw.gov.au within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this consent. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the noncompliance (if known) and what actions have been done, or will be, undertaken to address the noncompliance.</p> <p>6. Prior to commencing the construction, upgrading and decommissioning of the development, the Applicant must submit a compliance report to the Department in accordance with the relevant Compliance Reporting Post Approval Requirements (DPE 2018), or its latest version.</p> <p>7. Within 6 months of commencing construction, or as directed by the Secretary, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. The audit must:</p> <p>(a) be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2018);</p> <p>(b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</p> <p>(c) be carried out in consultation with the relevant agencies;</p> <p>(d) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and</p> <p>(e) recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.</p> <p>Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report must be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations.</p> <p>The recommendations of the Independent Environmental Audit must be implemented to the satisfaction of the Secretary.</p> <p>8. The Applicant must:</p> <p>(a) make the following information publicly available on its website as relevant to the stage of the development:</p> <ul style="list-style-type: none"> the EIS; the final layout plans for the development; current statutory approvals for the development; approved strategies, plans or programs required under the conditions of this consent; the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; 	<p>Section 9.1</p> <p>Section 7.2.1</p> <p>Section 7.2.20</p> <p>Section 7.2.3</p> <p>Section 7.2.4</p> <p>Section 8.4</p>

Schedule	Condition	Section in this ACHMP
	<ul style="list-style-type: none"> how complaints about the development can be made; a complaints register; compliance reports; any independent environmental audit, and the Applicant's response to the recommendations in any audit; and any other matter required by the Secretary; and (b) keep this information up to date.	

2.2 PROJECT COMMITMENTS

In addition to the consent conditions a number of commitments were made in the EIS. As the EIS was the basis for Development Consent, the commitments must be adhered to. The commitments that pertain to heritage management are presented in **Table 2-2**. The table identifies all the commitments relating to Aboriginal heritage and identifies where in the ACHMP individual requirements have been addressed.

Table 2-2: Commitments made for an ACHMP.

Commitment No.	Commitment	Section in this ACHMP
AH.1	ESCO Pacific (now Mytilineos, who acquired the project) and its Contractors will adhere to the following Statement of Commitments:	<i>See subsection below</i>
AH.1.1	<ul style="list-style-type: none"> The Aboriginal Cultural Heritage Management Plan (ACHMP) will be developed in consultation with the RAPs and the recommendations of the ACHAR. Impacts to Aboriginal heritage will be managed in accordance with the ACHMP. 	Section 3.2 and Section 5
AH.1.2	<ul style="list-style-type: none"> As project design is finalised all efforts will be made to conserve Aboriginal sites in the development site 	Section 6
AH.1.3	<ul style="list-style-type: none"> The location of Glenroy-OS1 and OS2; Glenroy-IF2; Glenroy-IF6; and Glenroy-IF9, will be noted and efforts made to avoid these sites as they are located near the perimeter of the development site in a landform that will be subject to less disturbance than adjacent landforms 	Section 6.1.2
AH.1.4	<ul style="list-style-type: none"> The impacted isolated finds (Glenroy-IF1; Glenroy-IF3 to IF5; Glenroy-IF7 to IF8; and Glenroy-IF10), that have been recorded within the development site will be salvaged, along with any located near the perimeter of the development site that are unable to be avoided 	Section 6.1.1 – note that Glenroy-IF1 and Glenroy-IF8 will now be avoided by the Project.
AH.1.5	<ul style="list-style-type: none"> The salvaged artefacts will be reburied at a location outside of the development site, but within the lot boundary where no future developments are planned. The manner of reburial will be detailed in the ACHMP following RAP consultation. A site card will be submitted to AHIMS to register the location of any reburied artefacts 	Section 6.2.1
AH.1.6	<ul style="list-style-type: none"> An Aboriginal Site Impact Recording Form will be submitted to AHIMS recording the results of the salvage of any sites associated with the Project 	Section 6.1.1
AH.1.7	<ul style="list-style-type: none"> Should any sites within the development site (Glenroy-OS1 and OS2; Glenroy-IF2; Glenroy- IF6; and Glenroy-IF9) be able to be avoided, those sites will be clearly and permanently demarcated to avoid inadvertent impacts. The demarcation will include permanent signage. ESCO Pacific [now Mytilineos] and its Contractors will consider permanently fencing these sites to avoid inadvertent impacts 	Section 6.1.2
AH.2	All land-disturbing activities will be confined to the assessed area within the lot boundary. Should the parameters of the proposed work extend beyond the assessed area, then further archaeological assessment may be required.	Section 5.4

Commitment No.	Commitment	Section in this ACHMP
AH.3	Inductions for staff undertaking the proposed activity shall include the legislative protection requirements for Aboriginal sites and items in NSW and the relevant fines for non-compliance	Section 5.3
AH.4	If any Aboriginal object is discovered and/or harmed (in, or under the land), while undertaking the proposed development activities, ESCO Pacific [now Mytilineos] and its Contractors will:	<i>See subsection below</i>
AH.4.1	<ul style="list-style-type: none"> not further harm the object 	Section 7.2
AH.4.2	<ul style="list-style-type: none"> immediately cease all work at the particular location 	Section 7.2
AH.4.3	<ul style="list-style-type: none"> secure the area so as to avoid further harm to the Aboriginal object 	Section 7.2
AH.4.4	<ul style="list-style-type: none"> notify OEH [now Heritage NSW] as soon as practical on 02 9873 8500 providing any details of the Aboriginal object and its location 	Section 7.2
AH.4.5	<ul style="list-style-type: none"> not recommence any work at the particular location unless authorised in writing by OEH [now Heritage NSW] 	Section 7.2
AH.5	In the event that Aboriginal burials are unexpectedly encountered during the activity, work must stop immediately, the area secured to prevent unauthorised access, and NSW Police and OEH [now heritage NSW] contacted.	Section 7.1
AH.6	ESCO Pacific (now Mytilineos, who acquired the project) will cooperate with the appropriate authorities and relevant Aboriginal community representatives to facilitate:	<i>See subsection below</i>
AH.6.1	<ul style="list-style-type: none"> the recording and assessment of the find(s) 	Section 7.1
AH.6.2	<ul style="list-style-type: none"> the fulfilment of any legal constraints arising from the find(s) including complying with OEH [now heritage NSW] directions 	Section 7.1
AH.6.3	<ul style="list-style-type: none"> the development and implementation of appropriate management strategies, including consultation with stakeholders and the assessment of the significance of the find(s) 	Section 7.1
AH.7	Where the find(s) are determined to be Aboriginal object(s), recommencement of work in the area of the find(s) can only occur in accordance with any consequential legal requirements and after gaining written approval from OEH [now heritage NSW] (normally an Aboriginal Heritage Impact Permit.	Section 7.1 and 7.2

3 CONSULTATION

3.1 GOVERNMENT CONSULTATION

As outlined in *Condition 19(a)* of the Development Consent, the ACHMP must be prepared in consultation with the Office of Environment and Heritage (now Heritage NSW) and be submitted to the Department of Planning, Industry and Environment (DPIE) to satisfy *Condition 19(b)* (**Table 2-1**).

Accordingly, a copy of this ACHMP was provided to Heritage NSW for their review and comments. Correspondence from Heritage NSW is presented in **Appendix 2**.

3.2 ABORIGINAL COMMUNITY CONSULTATION

3.2.1 Aboriginal parties consulted

Details of Aboriginal community consultation undertaken for *the Aboriginal Cultural Heritage Assessment Report* is detailed in OzArk 2019. The assessment followed the guidelines contained in the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (ACHCRs, DECCW 2010b). The ACHCRs for the Project were initiated and undertaken by ESCO Pacific Pty Ltd.

In summary, the following Registered Aboriginal Parties (RAPs) were identified and consulted with respect to proposed management of Aboriginal sites.

- Bundyi Culture
- West Wyalong Local Aboriginal Land Council (LALC)
- Young LALC.

3.2.2 Consultation in developing this ACHMP

A log regarding the consultation is provided in **Appendix 3 Figure 1**

During the drafting of this ACHMP, the RAPs listed in **Section 3.2.1** were consulted. A copy of the draft ACHMP was distributed to all RAPs on 19 May 2021 for their review (**Appendix 3 Figure 2**). Feedback was requested by 2 June 2021 but noted that should further time be reviewed this would be granted.

No feedback was received from the RAPs regarding the ACHMP within the requested feedback time. As such, follow up calls were made to the RAPs to see whether they had any feedback and a copy of the ACHMP was resent.

West Wyalong LALC

Feedback was received from West Wyalong LALC on 21 July 2021 (**Appendix 3 Figure 3**), as follows:

... The ACHMP is fine with us. We have no issues with the reburial of salvaged artefacts at proposed site in accordance with guidelines outlined in ACHMP.

Bundyi Culture

Feedback was also received from Bundyi Culture on 23 July 2021 (**Appendix 3 Figure 3**). The full response from OzArk to the feedback provided by Bundyi Culture is presented in **Appendix 3 Figure 4**. Based on the feedback received from Bundyi Culture, the following updates have been made to the ACHMP:

- **Section 5.3** has been updated to include:
 - RAP representatives will be invited to provide an induction to Mytilineos site personnel
 - Mention that the Project Area is located on Wiradjuri Country
 - An artefact identification sheet has been included in **Appendix 4** to be used by the Proponent for the Aboriginal heritage inductions.
- **Section 6.1.1.1** has been updated to include that a RAP representative should be provided with the opportunity to attend the salvage and reburial of the artefacts.

A response received from Bundyi Culture on 23 August 2021 supported the changes made to the ACHMP.

Young LALC

No feedback was received from Young LALC.

3.2.3 Ongoing consultation protocols

RAPs will be kept informed with respect to activities and operations which may impact on Aboriginal heritage management.

Notification within a reasonably prompt timeframe will be issued to all Aboriginal parties where:

- Significant changes to the Project may have implications for Aboriginal heritage management
- There is a discovery in the course of construction or operation of the Project, e.g. Unexpected finds of Aboriginal ancestral remains or object(s)
- Significant land management actions are required in Aboriginal site protection areas not envisaged by this ACHMP.

Issues raised by RAPs in conversations whether by telephone or in person in the course of ongoing consultation will be documented in writing by the Proponent or the Archaeologist involved in the correspondence.

RAPs will be consulted as part of any formal review of the ACHMP.

4 THE ABORIGINAL HERITAGE RESOURCE

4.1 IDENTIFIED ABORIGINAL CULTURAL HERITAGE

As a result of the archaeological assessment (OzArk 2019), 12 sites were identified within the Project Area. No previously recorded Aboriginal sites were present within the Project Area.

Table 4-1 lists the Aboriginal site types known to exist within the Project Area and **Table 4-2** provides details of the 12 sites. **Figure 4-1** shows the location of the recorded Aboriginal sites within the Project Area.

Detailed descriptions and images of each site are provided in Section 5.4 of OzArk 2019.

Table 4-1: Aboriginal site types within the Project Area.

Site type	Number	Percentage of total (% rounded)
Isolated finds	10	83
Artefact scatters	2	17

Table 4-2: Recorded Aboriginal sites within the Project Area.

AHIMS ID	Site Name	Site coordinates (GDA Zone 55)	Site Type	Site Description
43-4-0070	Glenroy-OS1	529762E 6250717N	Artefact scatter	The site is a low-density artefact scatter on a plain landform. It comprises of four silcrete flakes and one core manufactured from silcrete.
43-4-0069	Glenroy-OS2	529230E 6251445N	Artefact scatter	The site is a very low-density artefact scatter on a plain landform comprising of two flakes. One manufactured of quartz and one manufactured from silcrete.
43-4-0068	Glenroy-IF1	529221E 6249637N	Isolated find	The site comprises of a single silcrete flake on a plain landform within a ploughed field.
43-4-0067	Glenroy-IF2	529256E 6249482N	Isolated find	The site comprises of a single silcrete flake on a plain landform within a ploughed field.
43-4-0066	Glenroy-IF3	529511E 6250110N	Isolated find	The site comprises of a single silcrete flake on a plain landform within a ploughed field, adjacent to an electricity pole.
43-4-0065	Glenroy-IF4	529800E 6250224N	Isolated find	The site consists of a single quartz flake on a plain landform in a ploughed field.
43-4-0064	Glenroy-IF5	529795E 6250089N	Isolated find	The site consists of a single silcrete blade on a plain landform in a ploughed field.
43-4-0063	Glenroy-IF6	529817E 6250639N	Isolated find	The site consists of a single silcrete flake on a plain landform in a ploughed field along a farm access track.
43-4-0062	Glenroy-IF7	529286E 6250679N	Isolated find	The site consists of a single quartz flake on a plain landform in a ploughed field.
43-4-0061	Glenroy-IF8	529557E 6250893N	Isolated find	The site consists of a single silcrete core on a plain landform in a ploughed field.
43-4-0060	Glenroy-IF9	529000E 6251384N	Isolated find	The site consists of a single silcrete flake on a plain landform in a ploughed field.
43-4-0059	Glenroy-IF10	528821E 6250268N	Isolated find	The site consists of a single quartz flake on a plain landform in a ploughed field.

Figure 4-1: Location of recorded sites within the Project Area.



4.2 CULTURAL VALUES

Social or cultural value refers to the spiritual, traditional, historical, or contemporary associations and attachments the place or area has for Aboriginal people. Social or cultural value is how people express their connection with a place and the meaning that place has for them.

Places of social or cultural value have associations with contemporary community identity. These places can have associations with tragic or warmly remembered experiences, periods, or events. Communities can experience a sense of loss should a place of social or cultural value be damaged or destroyed.

There is not always consensus about a place's social or cultural value. Because people experience places and events differently, expressions of social or cultural value do vary and, in some instances, will be in direct conflict. When identifying values, it is not necessary to agree with or acknowledge the validity of each other's values, but it is necessary to document the range of values identified.

Social or cultural value can only be identified through consultation with Aboriginal people. This could involve a range of methodologies, such as cultural mapping, oral histories, archival documentation, and specific information provided by Aboriginal people specifically for the investigation.

A copy of the ACHAR was sent to the RAPs on 29 October 2018. No feedback was received relating to the social or cultural value of the newly recorded sites. As such, for the purposes of assessing the potential impact to Aboriginal cultural heritage, all recorded sites were accorded high social and cultural values. This is because Aboriginal sites are seen by the community as a marker of ancient occupation across the region, as well as being a tangible link to their ancestors.

5 MANAGEMENT STRATEGY

5.1 IDENTIFYING ABORIGINAL HERITAGE IMPACTS

Project impacts will occur to Aboriginal objects both at Aboriginal sites where objects are visible, as well as potentially below the ground surface where they are not readily apparent. The impacts to Aboriginal sites through the Project were identified and assessed as part EIS.

The findings of the archaeological survey confirm that Aboriginal stone artefacts are broadly distributed within the soil across the Project Area, albeit at a low-density, and that vegetation cover and soil exposure conditions can change to reveal previously obscured artefacts. Such exposed artefacts are referred to as “sites” which means the site where Aboriginal objects may be observed in the present. Similarly changing environmental conditions can obscure previously visible Aboriginal objects. The phenomenon of previously recorded “sites” not being discoverable at a later time is also common.

The management strategy addresses the recorded sites of Aboriginal objects, as well as the inferred broad distributions of Aboriginal stone artefacts reflecting past Aboriginal activity in all parts of the landscape. Because Aboriginal objects occur within the topsoil in parts of the Project Area, impacts to undiscovered Aboriginal objects may occur. The management strategy is provided as mitigation of all Aboriginal heritage impacts, including impacts to those Aboriginal objects that have been recorded and Aboriginal objects which may occur unrecorded within the topsoil.

5.2 OBLIGATION TO PROTECT ABORIGINAL CULTURAL HERITAGE

5.2.1 Obligation to avoid harm

All employees, contractors, sub-contractors, and visitors to the Project Area have an obligation to avoid harming Aboriginal heritage unless engaged in approved development activity in an area where Aboriginal salvage obligations have been met as described in this ACHMP.

The definition of harm used in this ACHMP stems from the definition in Section 5 of the *National Parks and Wildlife Act 1974* (NPW Act). The examples used below are for illustrative purposes and are not exhaustive.

Harm to an Aboriginal object or Aboriginal site means:

- Moving or collecting stone artefacts (although picking up artefacts and inspecting them is acceptable as long as they are immediately returned to their original location.
- Disturbing the earth where stone artefacts are located, e.g. by earthworks for drains, roads, etc.
- Breaking stone artefacts, e.g. by running over them in a vehicle.

- Cutting down, disturbing or otherwise marking scarred trees.

Trivial or negligible impacts to Aboriginal objects are not regarded as harm.

5.2.2 Obligation to protect harm

All employees, contractors and sub-contractors of the Project Area having responsibility for land management, construction or operation have an obligation to protect Aboriginal heritage within their area of work responsibility.

Protection means active recognition of known Aboriginal heritage and active measures to avoid Aboriginal heritage.

5.2.3 Obligation to implement impact management measures

All employees, contractors and sub-contractors of the Project Area have a responsibility to ensure that the appropriate Aboriginal heritage salvage has been conducted prior to or in association with their activities which impact Aboriginal objects.

5.2.4 Obligation to minimise harm to the environment

In meeting the specific environmental performance criteria established under this consent, the Proponent will implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.

5.3 ABORIGINAL HERITAGE INDUCTIONS

All employees, contractors, sub-contractors, and visitors to the Project Area will be made aware of the obligation to avoid harm to Aboriginal heritage through an Aboriginal heritage component of a general site induction to be completed by Mytilineos site personnel. RAP representatives will be invited to provide an induction to Mytilineos site personnel. The heritage induction will be provided to all personnel prior to them carrying out any development work within the Project Area.

The induction will include the following points expressed in plain language.

- The Project Area is located on Wiradjuri Country. A sign will be erected in the Project Area to reinforce this
- Aboriginal sites occur across the Project Area
- Aboriginal sites are of great significance to the Aboriginal community, are important to the wider community and must be treated with respect
- Aboriginal sites include stone tool artefacts
- Many Aboriginal artefacts are hidden within the topsoil and are not readily visible. The apparent absence of a site does not mean it is no longer in existence.

- Aboriginal sites are protected by law. The Development Consent for the Project includes conditions allowing impact to certain specified Aboriginal sites described in the EIS and this ACHMP. Should any sites not permitted to be impacted by the ACHMP be impacted by the Project, relevant fines for non-compliance may be issued.

An artefact identification sheet is provided in **Appendix 4** to assist employees, contractors, sub-contractors, and visitors to the Project Area should they encounter a potential artefact.

A record will be kept of all personnel who have completed the heritage induction.

5.4 GENERAL STRATEGIES

Aboriginal sites within the Project Area, but outside of impact areas, will not be harmed. These sites will be protected by fencing to ensure they are not inadvertently impacted during the construction phase of the Project (refer to **Section 6.1.2**).

Any sites within impact areas are likely to be harmed. All known sites within impact areas will be salvaged under the terms of this ACHMP (refer to **Section 6.1**). However, before an area is impacted by approved activities, a previously unknown Aboriginal object(s) may be noted. The following management strategy relates to new discoveries within impact areas:

- Information, such as location and photographs, will first be sent to an archaeologist to gain a preliminary determination of whether the discovery is an Aboriginal object
- If it is determined to be an Aboriginal object, the object(s) will be recorded and assessed by an archaeologist to determine the management group of the site comprising the objects
- Any Aboriginal objects identified within impact areas will be salvaged following the methodology set out in **Section 6.1.1.1**
- All findings will be described in a technical report.

The procedures for the discovery of additional Aboriginal objects and/or human skeletal material at the Project Area are detailed in **Section 7**.

All ground-disturbing activities will be confined to the impact footprint shown in **Figure 6-1** within the approved Project Area. Where any ground land-disturbing activities extend beyond the assessed area, then further archaeological assessment will be required.

6 SALVAGE AND MANAGEMENT OF ABORIGINAL SITES

6.1 MANAGEMENT GROUPS

Based on the approved disturbance footprint of the Project, five sites are within impact areas. Seven sites occur in non-impact areas although they will require additional management to ensure that they are not harmed. Management of these sites falls under two management groups, namely:

- **Group 1:** Sites Requiring Salvage. This group includes sites directly within or adjacent to impact areas. Sites within this group will be subject to surface collection.
- **Group 2:** Sites Requiring Management. This group includes sites not to be impacted by the Project but require permanent fencing to ensure they are not inadvertently impacted.

Table 6-1 identifies all sites and nominates the management group to which each is assigned.

The following sub-sections describe the specific salvage and management measures to be applied to the sites within each group.

Table 6-1: Site impact and management assessment.

AHIMS ID	Site Name	Assessed Scientific Significance	Degree of Harm (Total/Partial/None)	Management Strategy
43-4-0070	Glenroy-OS1	Low	None	Group 2: Site is located on the eastern boundary of the Project Area and away from the impacts proposed within the development impact footprint. A portion of the site is situated within the adjacent property to the east (Lot 161), and as it is outside of the Project Area, there is a high likelihood that this portion of the site is unable to be demarcated by permanent fencing. The portion of the site within the Project Area (Lot 160) will be demarcated with permanent fencing prior and during the course of development. Information signs will also be placed at the site.
43-4-0069	Glenroy-OS2	Low	None	Group 2: Site is located along the northern boundary of the Project Area and away from the impacts proposed within the development impact footprint. The site will be demarcated with permanent fencing prior and during the course of development. Information signs will also be placed at the site.
43-4-0068	Glenroy-IF1	Low	None	Group 2: Site is located away from the impacts proposed within the development impact footprint. The site will be demarcated with permanent fencing prior and during the course of development. Information signs will also be placed at the site.
43-4-0067	Glenroy-IF2	Low	None	Group 2: Site is located near to the southern boundary of the Project Area and away from the impacts proposed within the development impact footprint. The site will be demarcated with permanent fencing prior and during the course of development. Information signs will also be placed at the site.
43-4-0066	Glenroy-IF3	Low	Total	Group 1: Description and collection of surface artefact as per Section 6.1.1.1 .
43-4-0065	Glenroy-IF4	Low	Total	Group 1: Description and collection of surface artefact as per Section 6.1.1.1 .

AHIMS ID	Site Name	Assessed Scientific Significance	Degree of Harm (Total/Partial/None)	Management Strategy
43-4-0064	Glenroy-IF5	Low	Total	Group 1: Description and collection of surface artefact as per Section 6.1.1.1 .
43-4-0063	Glenroy-IF6	Low	None	Group 2: Site is located on the eastern boundary of the Project Area and away from the impacts proposed within the development impact footprint. The site will be demarcated with permanent fencing prior and during the course of development. Information signs will also be placed at the site.
43-4-0062	Glenroy-IF7	Low	Total	Group 1: Description and collection of surface artefact as per Section 6.1.1.1 .
43-4-0061	Glenroy-IF8	Low	None	Group 2: Site is located near the eastern boundary of the Project Area and away from the impacts proposed within the development impact footprint. The site will be demarcated with permanent fencing prior and during the course of development. Information signs will also be placed at the site.
43-4-0060	Glenroy-IF9	Low	None	Group 2: Site is located along the northern boundary of the Project Area and away from the impacts proposed within the development impact footprint. The site will be demarcated with permanent fencing prior and during the course of development. Information signs will also be placed at the site.
43-4-0059	Glenroy-IF10	Low	Total	Group 1: Description and collection of surface artefact as per Section 6.1.1.1 .

6.1.1 Group 1: Sites requiring salvage

Five sites fall into this group:

- 43-4-0066 (Glenroy-IF3)
- 43-4-0065 (Glenroy-IF4)
- 43-3-0064 (Glenroy-IF5)
- 43-4-0062 (Glenroy-IF7)
- 43-3-0059 (Glenroy-IF10)

Detailed recording and collection of surface artefacts will be the primary management approach for sites in this category.

6.1.1.1 Archaeological salvage: surface collection of artefacts

The following methodology will apply to all Group 1 sites:

Stone artefact sites managed under the archaeological salvage will have surface artefacts mapped, catalogued, photographed, collected and moved for safe-keeping.

The surface collection will include the following methodology:

- All visible artefacts at a site will be flagged in the field
- The site will be photographed after flagging and before recording

- All artefacts will have the following artefact information entered directly into a GPS unit:
 - Location
 - Artefact type
 - Size
 - Reduction level
 - Integrity
 - Raw material
 - Notes.
- A selection of indicative and / or unusual artefacts from each site will be photographed
- Once all recording is complete, the artefacts will be collected according to site with artefacts from each site being kept separate
- Should the collection team encounter a human burial, all work will cease in the area and advice from authorities (see **Section 7.1.1**) and RAPs (should the remains be Aboriginal) sought
- Although all Group 1 sites were recorded as isolated finds, other artefacts may be present nearby at the time of the salvage. Any additional artefacts within the approved impact footprint of the Project that are liable to be harmed will also be salvaged following this methodology
- The recording of the artefacts recovered will largely be completed in the field and this data would be incorporated into a report
- The supervising archaeologist would be responsible for submitting an Aboriginal Site Impact Recording Form (ASIRF) to the Aboriginal Heritage Information Management System (AHIMS) to update the register with the results of the salvage works
- The salvaged artefacts will be reburied at an agreed upon location. This will take place in accordance with Requirement 26 “Stone artefact deposition and storage” in the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (Code of Practice; DECCW, 2010). The location chosen for reburial will be an area where future developments will not occur and as close as possible to their original location. A site card will be submitted to AHIMS to record the relocation area
- A RAP representative will be offered the opportunity to participate in the salvage and reburial of the Aboriginal sites.

6.1.2 Group 2: Sites Requiring Management

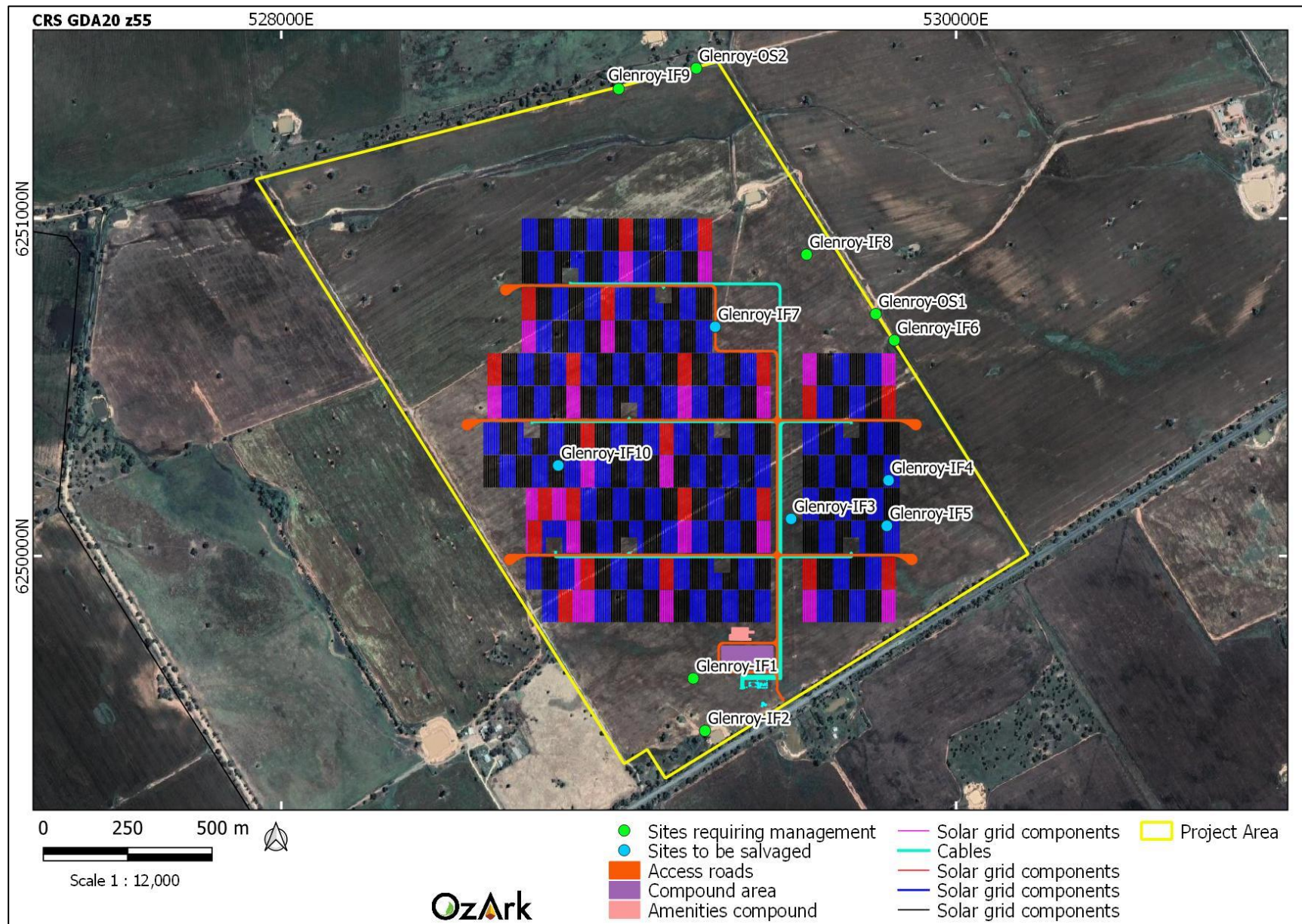
Seven sites fall into this group:

- 43-3-0070 (Glenroy-OS1)

- 43-4-0069 (Glenroy-OS2)
- 43-4-0068 (Glenroy-IF1)
- 43-4-0067 (Glenroy-IF2)
- 43-4-0063 (Glenroy-IF6)
- 43-4-0061 (Glenroy-IF8)
- 43-4-0060 (Glenroy-IF9)

These sites are located within the Project Area but outside of the impact footprint of the Project. To ensure they are not inadvertently impacted, the site extents will be fenced prior to works commencing. The fencing must be permanent and include permanent signage.

Figure 6-1: Location of recorded Aboriginal sites in relation to the impact footprint.



6.2 MANAGEMENT OF SALVAGE ARTEFACTS

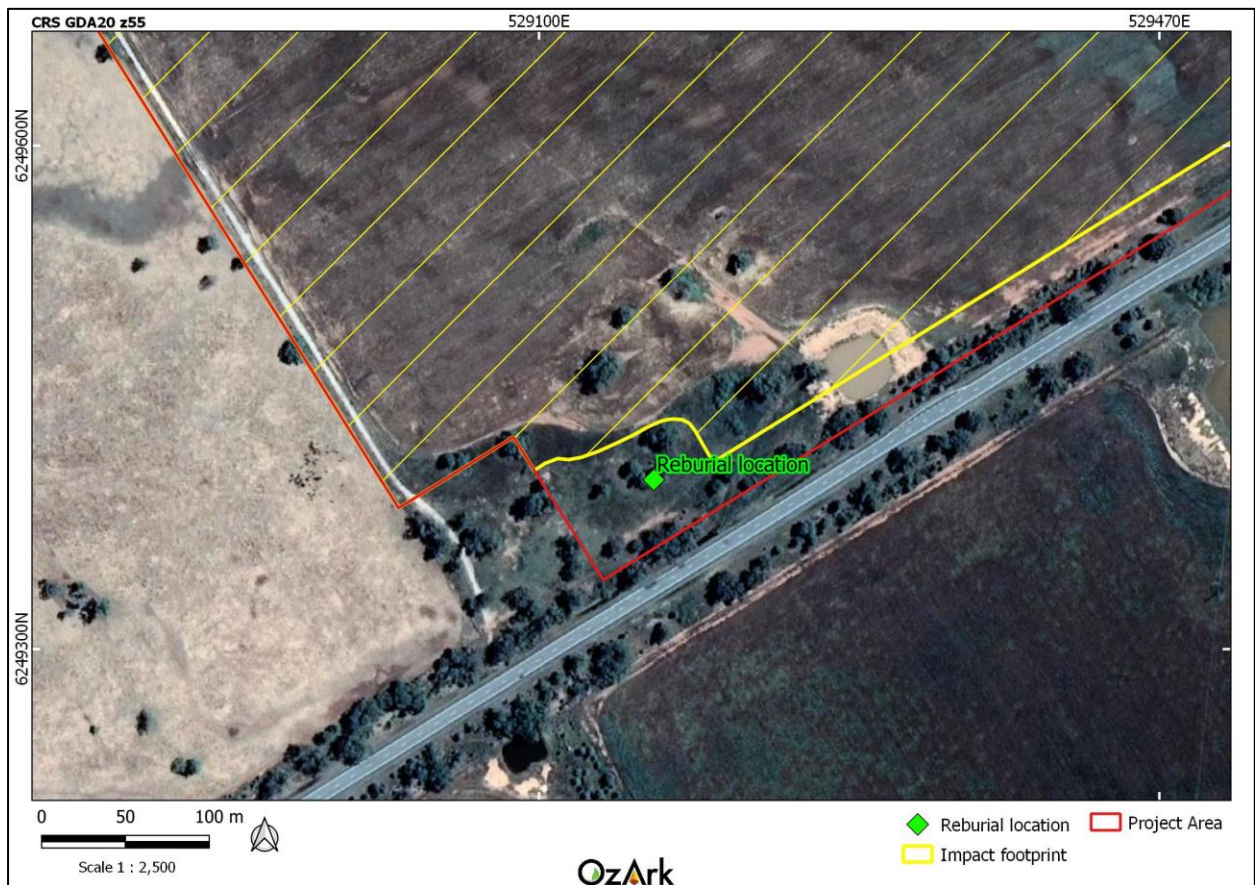
6.2.1 Long-term care and control of artefacts

Following consultation with RAPs during the ACHCRs, the preferred option for the long-term management of the salvaged artefacts was reburial at the location shown in **Figure 6-2**. This will take place in accordance with Requirement 26 “Stone artefact deposition and storage” in the Code of Practice.

All RAPs will be invited to visit the reburial location following the salvage of the sites and take place in the reburial.

A site card will be submitted to AHIMS to record the reburial location.

Figure 6-2: Reburial location.



6.2.2 Intermediate provisions for artefact storage

Should the reburial of the salvage artefacts not be able to take place immediately following the salvage, OzArk will undertake to store any artefacts retrieved in a locked cupboard at the OzArk office: 145 Wingewarra Street, Dubbo, NSW, until the reburial can take place.

6.3 SALVAGE REPORT

A technical report will be prepared documenting the results of the Aboriginal site salvage in accordance with the Code of Practice. This report will be prepared within four months of the conclusion of all salvage activities. A copy of the salvage report will be sent to the AHIMS register so that the information gained is available for the general public.

A copy of the report will be archived by the Proponent for future reference.

7 DETAILED PROCEDURES

7.1 UNANTICIPATED FINDS PROTOCOL

7.1.1 Discovery of Aboriginal ancestral remains

The procedure related to the discovery of suspected human skeletal material are based on Requirement 25 of the Code of Practice.

In the event known or suspected Aboriginal skeletal remains are encountered during the course of Project the following procedure will be followed:

- All work close to the find will cease immediately and a minimum buffer of 10 m in all directions from the visible remains will be cordoned off with temporary construction fencing
- The find will be immediately reported to the site supervisor who will immediately advise the Proponent.
- The Proponent will promptly contact the nearest police station (as required for all human remains discoveries)
- The Proponent will contact Heritage NSW (02 9873 8500 (heritagemailbox@environment.nsw.gov.au) for advice on identification of the skeletal material as Aboriginal and management of the material
- If the remains are Aboriginal ancestral remains, the RAPs will be contacted and consultative arrangements will be made to discuss ongoing care of the remains, including advice on recommended forensic anthropologists
- Recommencement of work in the area surrounding the Aboriginal ancestral remains can only occur once the updated ACHMP for the Project has been endorsed by the Secretary (or their delegate), or the Secretary is satisfied that the measures to be implemented in managing the remains have been undertaken and makes a written direction in that regard.

7.1.2 Discovery of unrecorded Aboriginal objects

7.1.2.1 Initial procedure

In the event of discovery of unrecorded Aboriginal objects, all work close to the discovery will cease and an area of 10 m around the object(s) fenced with temporary construction fencing. An archaeologist will be contacted to determine the veracity of the Aboriginal object(s) present.

If determined to be an Aboriginal object, the location will be visited by an archaeologist and a RAP representative to record the site and to determine its significance. New recordings will be registered in the Aboriginal Heritage Information Management System (AHIMS) registrar (**Section 8.3.1**) with management undertaken in accordance with depending on proximity of the object(s) to the impact area.

7.1.2.2 New sites within impact areas

If a newly discovered Aboriginal object is in the approved impact area, the site will be temporarily fenced, and the Aboriginal object(s) will be salvaged in accordance with the procedures set out in **Section 6.1.1**. On the completion of salvage at such sites, an Aboriginal Site Impact Recording Form (ASIRF) will be completed and submitted to the AHIMS registrar within one month after completion of salvage fieldwork (**Section 8.3.2**). Copies of the ASIRF will be archived by the Proponent. Recommencement of work should only take place at the site location once the ASIRF has been approved by AHIMS.

A technical report will be completed within four months of the salvage excavation and a copy sent to the AHIMS register. The Proponent will also archive a copy of the report for future reference.

7.1.2.3 New sites within non-impact areas

If the site is not within or near to the approved impact area, there is no requirement to fence the site. If the site is near the approved impact area and could be inadvertently harmed, the procedure set out in **Section 6.1.2** should be followed. Recommencement of work may only take place once the required management measures are implemented.

Proposed impact by the Project or related activities to any site outside of the approved impact area will require an Aboriginal Heritage Impact Permit (AHIP) to be obtained from the Heritage NSW, unless it is part of a future modification to SSD-9564.

7.2 COMPLIANCE

7.2.1 Incident notification

The Proponent will provide written notice to DPIE immediately after the Proponent becomes aware of an incident regarding Aboriginal heritage. The notification will identify the development (including the development application number and the name of the development) and set out the location and nature of the incident. Written notice will be addressed to compliance@planning.nsw.gov.au.

7.2.2 Non-compliance notification

The Proponent will provide written notice to DPIE within 7 days after the Proponent becomes aware of any non-compliance regarding the conditions of the consent. The notification will identify the development and the application number, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance. Written notice will be addressed to compliance@planning.nsw.gov.au.

7.2.3 Compliance reporting

Prior to commencing the construction, upgrading and decommissioning of the development, the Proponent will submit a compliance report to the Department in accordance with the relevant Compliance Reporting Post Approval Requirements (DPE 2018), or its latest version.

7.2.4 Independent environmental audit

Within six months of commencing construction, or as directed by the Secretary, the Proponent will commission and pay the full cost of an Independent Environmental Audit of the development. The audit will:

- (a) be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2018);
- (b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;
- (c) be carried out in consultation with the relevant agencies;
- (d) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and
- (e) recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.

Within three months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report will be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations.

The recommendations of the Independent Environmental Audit will be implemented to the satisfaction of the Secretary.

8 RECORD KEEPING AND REPORTING REQUIREMENTS

8.1 SALVAGE RECORDS

Copies of all records relevant to salvaged or relocated Aboriginal objects will be provided to the Proponents for their records.

Records relating to Aboriginal heritage include:

- This ACHMP
- Spatial data and maps showing site locations
- Site cards and ASIRFs
- Reports.

8.2 SALVAGE REPORTS

A technical report will be prepared documenting the results of the Aboriginal site salvage in accordance with the Code of Practice.

8.3 REPORTING REQUIREMENTS

8.3.1 Discovery of Aboriginal objects

Under s89A of the NPW Act, it is a requirement that Heritage NSW is notified of the existence of Aboriginal object(s) as soon as practicable after they are first identified. This is usually done through the completion of an Aboriginal Site Card which is submitted to the AHIMS registrar for inclusion on the Aboriginal sites database. Information regarding AHIMS and site recording forms can be downloaded from the AHIMS registrar.

8.3.2 Reporting impact to Aboriginal sites

Although not strictly required by the NPW Act, Heritage NSW expects that information on authorised impacts to Aboriginal sites be reported to them on the ASIRF which can be downloaded from the AHIMS registrar.

8.4 ACCESS TO INFORMATION

The Proponent will:

(a) make the following information publicly available on its website as relevant to the stage of the development:

- the EIS;
- the final layout plans for the development;
- current statutory approvals for the development;

- approved strategies, plans or programs required under the conditions of this consent;
- the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;
- how complaints about the development can be made;
- a complaints register;
- compliance reports;
- any independent environmental audit, and the Applicant's response to the recommendations in any audit; and
- any other matter required by the Secretary; and

(b) keep this information up to date.

9 DOCUMENT IMPLEMENTATION

9.1 REVIEW AND IMPROVEMENT

The ACHMP will be reviewed every five years at a minimum or following any salvage activities, a change in legislation, or modification to Development Consent containing conditions relevant to Aboriginal cultural heritage. This will include a review of performance and consideration of ongoing consultation. This will ensure the adequacy of the ACHMP and allow for opportunities of adaptive management and continual improvement.

Changes will be made to the ACHMP in the following circumstances:

- Following the completion of salvage activities within the Project Area
- Where new Aboriginal sites are discovered which require specific management approaches proportionate to their cultural significance and which are not otherwise covered in this ACHMP
- Where approved modifications to the Project introduce new impacts on Aboriginal heritage which are not generally covered by this ACHMP
- Where approved changes to the Project change or remove previously planned impacts on Aboriginal heritage where mitigation was proposed in the ACHMP but is no longer required.

Where changes are made to the ACHMP, a draft will be subject to Aboriginal consultation in accordance with the ACHMP. Matters raised in consultation which are specific to the changes in the ACHMP may be acknowledged and addressed in the revised ACHMP.

Further, a report containing the monitored effectiveness of the measures in the ACHMP will also be completed following any of the circumstances listed above occurring. The report should outline whether improvements could be made to management measures throughout the ACHMP. Should the report find improvements could be made, the ACHMP should be updated.

In accordance with Schedule 4, Condition 2 of the Development Consent, the Proponent will:

(a) update the strategies, plans or programs required under this consent to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site; and

(b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Secretary within 1 month of the:

- submission of an incident report under condition 4 of Schedule 4;
- submission of an audit report under condition 7 of Schedule 4; or
- any modification to the conditions of this consent.

9.2 ACCOUNTABILITIES

Who	Responsibilities
The Proponent	Responsible for coordinating the implementation of this ACHMP and for ensuring that the review of this ACHMP is undertaken. Responsible for ensuring that all personnel involved in the construction and operation of the development are suitably informed of the need to protect Aboriginal cultural heritage. Responsible for advising the Aboriginal community of operational changes relevant to the management of Aboriginal cultural heritage.
Aboriginal community	Responsible for providing expertise and appropriate and timely feedback in relation to the management of Aboriginal cultural heritage.
Archaeologist	Responsible for providing expertise in relation to the management of Aboriginal archaeology.

9.3 CHANGE INFORMATION

Full details of the document history are recorded in the document control register, by version.

A summary of the current change is provided below.

Version	Date	Review team	
1.0	2021	OzArk, the Proponent	ACHMP developed based on study conducted by OzArk 2019.

REFERENCES

Accent Environmental 2018	Accent Environmental Pty Ltd. 2018. <i>Wyalong Solar Farm: Environmental Impact Statement</i> . Report to ESCO Pacific Pty Ltd.
DECCW 2010	Department of Environment, Climate Change and Water, Sydney (now Heritage NSW). 2010. <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales</i> .
OzArk 2019	OzArk Environment & Heritage. 2019. <i>Aboriginal Cultural Heritage Assessment Report: Wyalong Solar Farm: "Glenroy and Glenee" 1409 Newell Highway, Wyalong NSW</i> . Report to ESCO Pacific Pty Ltd.

APPENDIX 1: DEVELOPMENT CONSENT CONDITIONS RELEVANT TO ABORIGINAL HERITAGE

HERITAGE

Protection of Heritage Items

17. The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 3 or located outside the approved development footprint.
18. The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 2 of Appendix 3.

If impacts on these items cannot be avoided, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location on site, in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW, 2010), or its latest version.

Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 3.

Heritage Management Plan

19. Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:
 - (a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;
 - (b) be prepared in consultation with OEH and Aboriginal Stakeholders;
 - (c) include a description of the measures that would be implemented for:
 - protecting the Aboriginal heritage items identified in Table 1 in Appendix 3 or outside the approved development footprint, including fencing off the Aboriginal heritage items prior to commencing construction and/or pre-construction minor works;
 - salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 2 in Appendix 3, if impacts to these items cannot be avoided;
 - a contingency plan and reporting procedure if:
 - previously unidentified heritage items are found; or
 - Aboriginal skeletal material is discovered;
 - ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and
 - ongoing consultation with Aboriginal stakeholders during the implementation of the plan;
 - (d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.

Following the Secretary's approval, the Applicant must implement the Heritage Management Plan.

APPENDIX 3: ABORIGINAL HERITAGE ITEMS

Table 1: Aboriginal heritage items – avoid impacts

Item name	AHIMS number	Item type
Glenroy-OS1	43-4-0070	Artefact scatters
Glenroy-IF6	43-4-0063	Isolated finds

Table 2: Aboriginal heritage items – avoid impacts or salvage and relocate

Item name	AHIMS number	Item type
Glenroy-OS2	43-4-0069	Artefact scatters
Glenroy-IF1	43-4-0068	Isolated finds
Glenroy-IF2	43-4-0067	Isolated finds
Glenroy-IF3	43-4-0066	Isolated finds
Glenroy-IF4	43-4-0065	Isolated finds
Glenroy-IF5	43-4-0064	Isolated finds
Glenroy-IF7	43-4-0062	Isolated finds
Glenroy-IF8	43-4-0061	Isolated finds
Glenroy-IF9	43-4-0060	Isolated finds
Glenroy-IF10	43-4-0059	Isolated finds

APPENDIX 2: GOVERNMENT CORRESPONDENCE

Heritage NSW correspondence



Our ref: DOC21/847789

Michael Sun
Project Manager
EcoPacific
email: michael@ecopacific.com.au

Dear Mr Sun

RE: Draft Aboriginal Cultural Heritage Management Plan for approved State Significant Development (SSD) 9564-PA-8.

Heritage NSW (HNSW) have received your request to review the proposed draft Aboriginal Cultural Heritage Management Plan (ACHMP) for the Wyalong Solar Farm, pursuant to condition 19 of Schedule 3 of the Development Consent.

HNSW accept the proposed strategies for safeguarding and minimising harm to Aboriginal cultural heritage (ACH). We have also considered that the surviving known examples of ACH consists mostly of, a low number of isolated stone artefacts (OzArk 2021:29 Appendix 3) and that the approved development is located on lands with an intense land use disturbance history.

It is HNSW understanding that the Registered Aboriginal Parties (RAP) which include, the West Wyalong Local Aboriginal Land Council (LALC), the Young LALC and Bundyi Culture, have not raised significant issues of the draft ACHMP and are generally accepting of the proposed ACH management strategies (OzArk 2021:8). We also note the responses to matters raised by Bundyi Culture in correspondence on the draft ACHMP (OzArk 2021:37-9).

If you have any questions regarding the above advice, please contact Phil Purcell, Archaeologist at Heritage NSW on 68835341 or phil.purcell@environment.nsw.gov.au.

Yours sincerely

Jackie Taylor
Senior Team Leader
Aboriginal Cultural Heritage Regulation - South
Heritage NSW
Department of Premier and Cabinet
28 September 2021

Level 6, 10 Valentine Ave Parramatta NSW 2150 ■ Locked Bag 5020 Parramatta NSW 2124
P: 02 9873 8500 ■ E: heritagemailbox@environment.nsw.gov.au

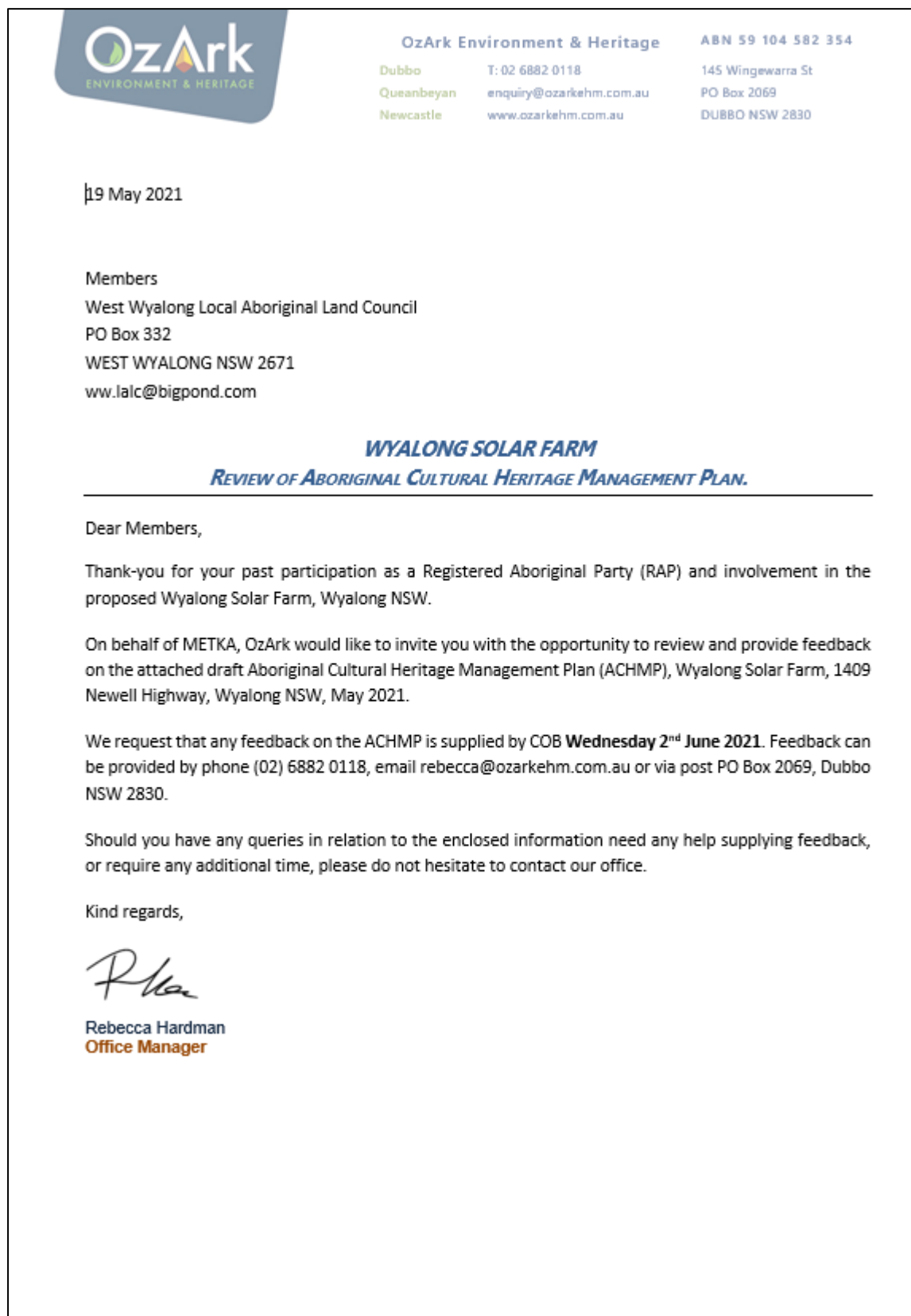
APPENDIX 3: ABORIGINAL COMMUNITY CONSULTATION

Appendix 3 Figure 1: Aboriginal Community Consultation Log

Date	Organisation	Comment	Method
19.5.21	Bunyi Culture	RH sent HMP to RAPs. Feedback ends 2.6.21	Email, delivery receipt received
19.5.21	West Wyalong LALC	RH sent HMP to RAPs. Feedback ends 2.6.21	Email, delivery receipt received. Read receipt received.
19.5.21	Young LALC	RH sent HMP to RAPs. Feedback ends 2.6.21	Email, delivery receipt received
20.7.21	Bundi Culture	RH phoned to confirm receipt of HMP and see if they have any feedback - left message	Phone
20.7.21	West Wyalong LALC	RH phoned to confirm receipt of HMP and see if they have any feedback - left message	Phone
20.7.21	Young LALC	RH phoned to confirm receipt of HMP and see if they have any feedback - left message	Phone
20.7.21	Bundi Culture	RH received call back to confirm receipt of HMP and see if he has any feedback. Mark requested RH resend and he will look at tomorrow and send through any feedback	Phone
20.7.21	Bundi Culture	RH resent HMP	Email
20.7.21	West Wyalong LALC	RH resent HMP and asked for call back in next few days to confirm receipt and if they have any feedback	Email
20.7.21	Young LALC	RH resent HMP and asked for call back in next few days to confirm receipt and if they have any feedback	Email
21.7.21	West Wyalong LALC	RH received read receipt	Email
21.7.21	West Wyalong LALC	RH received feedback: <i>I do recall getting this and thought I had responded. My apologies. The ACHMP is fine with us. We have no issues with the reburial of salvaged artefacts at proposed site in accordance with guidelines outlined in ACHMP.</i>	Email
21.7.21	West Wyalong LALC	RH thanked	Email
23.7.21	Bundi Culture	RH received feedback: <i>Here are some items that I want to be addressed with regards to the West Wyalong Solar Farm.</i> <ul style="list-style-type: none"> • 3.2 ABORIGINAL COMMUNITY CONSULTATION: Mark Saddler being identified as an (individual) and not as RAP from Bundi Culture. Please change this. • What procedures are in place to stop run off and contamination from entering Gagies Creek? • Better information is needed in METKA's induction process both online and face to face. With regards to "what is an artifact" I have been at the forefront of these processes with METKA at Wagga due to the horrible event that took place sometime ago. I will continue this at the West Wyalong project. • 5.3 ABORIGINAL HERITAGE INDUCTIONS. I will be heavily involved in this process. • 6.1.1.1 Archaeological salvage: surface collection of artefacts. All these processes are to happen with RAPs being present and onsite to do this important work. • 6.2 MANAGEMENT OF SALVAGE ARTEFACTS. Who decided on the area for reburial? Was this done in agreement of any RAPs? Where RAPs invite to attend to look at the area? • Signs to be erected on site stating you are on Wiradjuri Country. Input from RAPs to assist in this. 	Email
26.7.21	Bundi Culture	RH thanked	Email
9.8.21	Bundi Culture	SR sent response to feedback provided	Email

Date	Organisation	Comment	Method
23.8.21	Bundyi Culture	SR sent email to see if there were any further comments on the response provided	email
23.8.21	Bundyi Culture	Mark asked for the feedback to be resent	email
23.8.21	Bundyi Culture	SR resent response to feedback	email
23.8.21	Bundyi Culture	Mark said all looked ok	email

Appendix 3 Figure 2: ACHMP review cover letters





OzArk Environment & Heritage

Dubbo T: 02 6882 0118
 Queanbeyan enquiry@ozarkehm.com.au
 Newcastle www.ozarkehm.com.au

ABN 59 104 582 354

145 Wingewarra St
 PO Box 2069
 DUBBO NSW 2830

19 May 2021

Members

Young Local Aboriginal Land Council
 c/- Norma Freeman
 247 Boorowa Road
 Young NSW 2594
 younglalc62@gmail.com

WYALONG SOLAR FARM
REVIEW OF ABORIGINAL CULTURAL HERITAGE MANAGEMENT PLAN.

Dear Members,

Thank-you for your past participation as a Registered Aboriginal Party (RAP) and involvement in the proposed Wyalong Solar Farm, Wyalong NSW.

On behalf of METKA, OzArk would like to invite you with the opportunity to review and provide feedback on the attached draft Aboriginal Cultural Heritage Management Plan (ACHMP), Wyalong Solar Farm, 1409 Newell Highway, Wyalong NSW, May 2021.

We request that any feedback on the ACHMP is supplied by COB **Wednesday 2nd June 2021**. Feedback can be provided by phone (02) 6882 0118, email rebecca@ozarkehm.com.au or via post PO Box 2069, Dubbo NSW 2830.

Should you have any queries in relation to the enclosed information need any help supplying feedback, or require any additional time, please do not hesitate to contact our office.

Kind regards,

Rebecca Hardman
 Office Manager



OzArk Environment & Heritage

Dubbo T: 02 6882 0118
 Queanbeyan enquiry@ozarkehm.com.au
 Newcastle www.ozarkehm.com.au

ABN 59 104 582 354

145 Wingewarra St
 PO Box 2069
 DUBBO NSW 2830

19 May 2021

Members

Bundji Cultural Tours

C/- Mark Saddler

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

WYALONG SOLAR FARM***REVIEW OF ABORIGINAL CULTURAL HERITAGE MANAGEMENT PLAN.***

Dear Members,

Thank-you for your past participation as a Registered Aboriginal Party (RAP) and involvement in the proposed Wyalong Solar Farm, Wyalong NSW.

On behalf of METKA, OzArk would like to invite you with the opportunity to review and provide feedback on the attached draft Aboriginal Cultural Heritage Management Plan (ACHMP), Wyalong Solar Farm, 1409 Newell Highway, Wyalong NSW, May 2021.

We request that any feedback on the ACHMP is supplied by COB **Wednesday 2nd June 2021**. Feedback can be provided by phone (02) 6882 0118, email rebecca@ozarkehm.com.au or via post PO Box 2069, Dubbo NSW 2830.



Should you have any queries in relation to the enclosed information need any help supplying feedback, or require any additional time, please do not hesitate to contact our office.

Kind regards,

Rebecca Hardman
 Office Manager

Appendix 3 Figure 3: RAP responses

RE: Wyalong Solar Farm

 West Wyalong LALC <ww.lalc@bigpond.com>
To  Rebecca Hardman

[Reply](#) [Reply All](#) [Forward](#) [...](#)

Wed 21/07/2021 9:43 AM


Hi Rebecca,

I do recall getting this and thought I had responded. My apologies. The ACHMP is fine with us. We have no issues with the reburial of salvaged artefacts at proposed site in accordance with guidelines outlined in ACHMP.



Regards,

linton

Linton Howarth
Chief Executive Officer
West Wyalong LALC



76-78 Main St West Wyalong
NSW 2671
Ph 0269723493

23rd July 2021

Yamma (hello) Rebecca Hardman.

Here are some items that I want to be addressed with regards to the West Wyalong Solar Farm.


- 3.2 ABORIGINAL COMMUNITY CONSULTATION: Mark Saddler being identified as an (individual) and not as RAP from Bundyi Culture. Please change this.
- What procedures are in place to stop run off and contamination from entering Gagies Creek?
- Better information is needed in METKA's induction process both online and face to face. With regards to "what is an artifact" I have been at the forefront of these processes with METKA at Wagga due to the horrible event that took place sometime ago. I will continue this at the West Wyalong project.
- 5.3 ABORIGINAL HERITAGE INDUCTIONS. I will be heavily involved in this process.
- 6.1.1.1 Archaeological salvage: surface collection of artefacts. All these processes are to happen with RAPs being present and onsite to do this important work.
- 6.2 MANAGEMENT OF SALVAGE ARTEFACTS. Who decided on the area for reburial? Was this done in agreement of any RAPs? Where RAPs invite to attend to look at the area?
- Signs to be erected on site stating you are on Wiradjuri Country. Input from RAPs to assist in this.

Regards,

Mark Saddler RAP

Bundyi Culture.

Appendix 3 Figure 4: OzArk response to feedback.



OzArk Environment & Heritage

Dubbo Queanbeyan Newcastle	T: 02 6882 0118 enquiry@ozarkehm.com.au www.ozarkehm.com.au	ABN 59 104 582 354 145 Wingewarra St PO Box 2069 DUBBO NSW 2830
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9 August 2021

Bundyi Culture
 C/ Mark Saddler
 marksad@live.com.au

WYALONG SOLAR FARM

ABORIGINAL CULTURAL HERITAGE MANAGEMENT PLAN

Dear Mark,

Thank you for providing feedback on the Aboriginal Cultural Heritage Management Plan (ACHMP) for the Wyalong Solar Farm (the project) dated 23 July 2021. We appreciate your time in considering the document.

Please see below responses to your comments:

- Aboriginal community consultation: Mark Saddler being identified as an (individual) and not as RAP from Bundyi Culture. Please change this.
 - The registration has been updated to 'Bundyi Culture' in the ACHMP
- What procedures are in place to stop run off and contamination from entering Gagies Creek?
 - This is beyond the scope of the ACHMP. The Construction Environmental Management Plan prepared for the project outlines the management measures for erosion and sediment control, waste management and potential hazardous substances. Please be assured that DPIE and Council provide two layers of governance that would not allow a project that is hazardous to proceed. Following the approvals, there will also be an environmental officer who would visit the site to monitor for compliance. METKA will contact you separately regarding this issue to provide any additional information you require.
- Better information is needed in METKA's induction process both online and face to face with regards to "what is an artefact" and Aboriginal heritage inductions. I will be heavily involved in this process
 - Procedures for Aboriginal heritage inductions are detailed in Section 5.3 of the ACHMP. An artefact identification sheet has now been added to the ACHMP in Appendix 4 to be included as part of the induction. RAP representatives will be invited to provide an induction to METKA site personnel.
- Archaeological salvage: surface collection of artefacts. All these processes are to happen with RAPs being present onsite to do this important work.
 - Section 6.1.1 has been updated to include a RAP representative being offered the opportunity to participate in the salvage and reburial of the artefacts.
- Management of salvaged artefacts: who decided on this area for reburial? Was this done in agreement of any RAPs? Were RAPs invited to attend to look at the area?

OzArk Environment & Heritage

- The reburial location was discussed with the site officers from the West Wyalong and Young Local Aboriginal Land Council who attended the survey in September 2018. The proposed reburial location was then presented within the draft Aboriginal Cultural Heritage Assessment Report (ACHAR) which was distributed to all RAPs in October 2018.
- Signs to be erected on site stating you are on Wiradjuri Country. Input from RAPs to assist in this.
 - This request is beyond the scope of the ACHMP however it will be noted in Section 5.3 of the ACHMP regarding Aboriginal heritage inductions, that contractors should be informed that the project is on Wiradjuri Country. METKA has also been informed to consider this when signage for the solar farm is developed.

Should you have any questions or queries in regard to the above responses please feel free to contact me.

Kind regards,



Stephanie Rusden
Senior Archaeologist
stephanie@ozarkehm.com.au

APPENDIX 4: ABORIGINAL ARTEFACT IDENTIFICATION

	
Retouched blades (scale = 1cm)	Flakes
	
Microliths (scale = 1cm)	Scraper (scale = 1cm)
	
Flake characteristics (scale = 1cm)	Core from which flakes have been removed (scale = 1cm)