



# Eurobodalla Regional Hospital (SSD-56989722): Aboriginal Cultural Heritage Management Plan

FINAL REPORT

Prepared for RP Infrastructure, on behalf of Health Infrastructure

13 September 2024

**Biosis offices**

**New South Wales**

**Albury**

Phone: (02) 6069 9200  
Email: [albury@biosis.com.au](mailto:albury@biosis.com.au)

**Gosford**

Phone: (02) 9101 8700  
Email: [gosford@biosis.com.au](mailto:gosford@biosis.com.au)

**Newcastle**

Phone: (02) 4911 4040  
Email: [newcastle@biosis.com.au](mailto:newcastle@biosis.com.au)

**Sydney**

Phone: (02) 9101 8700  
Email: [sydney@biosis.com.au](mailto:sydney@biosis.com.au)

**Western Sydney**

Phone: (02) 9101 8700  
Email: [sydney@biosis.com.au](mailto:sydney@biosis.com.au)

**Wollongong**

Phone: (02) 4201 1090  
Email: [wollongong@biosis.com.au](mailto:wollongong@biosis.com.au)

**Victoria**

**Ballarat**

Phone: (03) 5304 4250  
Email: [ballarat@biosis.com.au](mailto:ballarat@biosis.com.au)

**Melbourne**

Phone: (03) 8686 4800  
Email: [melbourne@biosis.com.au](mailto:melbourne@biosis.com.au)

**Wangaratta**

Phone: (03) 5718 6900  
Email: [wangaratta@biosis.com.au](mailto:wangaratta@biosis.com.au)



**Document information**

<b>Report to:</b>	RP Infrastructure on behalf of Health Infrastructure
<b>Prepared by:</b>	Anthea Vella Crystal Garabedian Ashley Bridge
<b>Biosis project no.:</b>	37940
<b>File name:</b>	37940.Eurobodalla.Regional.Hospital.ACHMP.DFT03.2 0240710
<b>Citation:</b>	Biosis 2024. Eurobodalla Regional Hospital (SSD-56989722): Aboriginal Cultural Heritage Management Plan. Report for RP Infrastructure on behalf of Health Infrastructure. Vella, A, Garabedian, C, Bridge, A, Biosis Pty Ltd., Wollongong, NSW. Project no. 3.7940

**Document control**

Version	Internal reviewer	Date issued
Draft version 01	Samantha Keats	14/03/2024
Draft version 02	Mathew Smith	27/03/2024
Draft version 03	Mathew Smith	19/06/2024
	Maggie Butcher	13/09/2024
Final version 01	Maggie Butcher	13/09/2024

**Acknowledgements**

Biosis gratefully acknowledges the contribution of the following people and organisations in undertaking this study:

- RP Infrastructure: Sam Jeffrey, Dan Humphries, Jack Duncalf.
- Health Infrastructure.
- Registered Aboriginal Parties.

Biosis staff involved in this project were:

- Anthea Vella, Ashley Bridge, Bronte Baonza, Charlotte Allen, Crystal Garabedian, Dominique Bezzina, Hannah Mills, Maggie Butcher, Molly Crissell, Nathan Windram, Sunday de Joux (assistance in the field).
- Astrid Mackegard and Henri Liswoyo (mapping).
- Samantha Keats and Mathew Smith (quality assurance).

*Biosis acknowledges the Aboriginal and Torres Strait Islander peoples as Traditional Custodians of the land on which we live and work.*

*We pay our respects to the Traditional Custodians and Elders past and present and honour their connection to Country and ongoing contribution to society.*

© Biosis Pty Ltd  
This document is subject to copyright and may only be used for the purposes in respect of which it was commissioned and in accordance with the Terms of Engagement of the commission. Unauthorised use of this document in any form whatsoever is prohibited.

Disclaimer:  
Biosis Pty Ltd has completed this assessment in accordance with the relevant federal, state and local legislation and current industry best practice. The company accepts no liability for any damages or loss incurred as a result of reliance placed upon the report content or for any purpose other than that for which it was intended.

## Abbreviations

<b>ACHAR</b>	Aboriginal Cultural Heritage Assessment Report
<b>ACHMP</b>	Aboriginal Cultural Heritage Management Plan
<b>AHIMS</b>	Aboriginal Heritage Information Management System
<b>AHIP</b>	Aboriginal Heritage Impact Permit
<b>ASIRF</b>	Aboriginal Site Impact Recording Form
<b>Biosis</b>	Biosis Pty Ltd
<b>CoC</b>	Conditions of Consent
<b>CwC</b>	Connecting with Country
<b>Cth DCCEEW</b>	Australian Commonwealth Department of Climate Change, Energy, the Environment and Water
<b>NSW DCCEEW</b>	NSW Department of Climate Change, Energy, the Environment and Water
<b>EP&amp;A Act</b>	<i>Environmental Planning and Assessment Act 1979</i>
<b>EPBC Act</b>	<i>Environment Protection Biodiversity Conservation Act 1999</i>
<b>HI</b>	Health Infrastructure
<b>Heritage NSW</b>	Heritage NSW, NSW Department of Climate Change, Energy, the Environment and Water
<b>HHA</b>	Historic Heritage Assessment
<b>ICOMOS</b>	International Council on Monuments and Sites
<b>NPW Act</b>	<i>National Parks and Wildlife Act 1974</i>
<b>PWG</b>	Project Working Group
<b>RAP</b>	Registered Aboriginal Party
<b>SSD</b>	State Significant Development
<b>SoHI</b>	Statement of Heritage Impact
<b>study area</b>	Defined as Lot 2 DP 128576, part of Lot 69 DP 752151, and the northern road reserve (part of the Albert Street road reserve)
<b>the Code</b>	<i>The Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i>
<b>WHS</b>	Work Health and Safety

# Contents

<b>Abbreviations.....</b>	<b>ii</b>
<b>Contents.....</b>	<b>iii</b>
<b>1 Introduction .....</b>	<b>1</b>
1.1 Project background .....	1
1.2 Study area .....	2
1.3 General scope of works.....	3
1.4 Purpose and objectives .....	3
1.5 Aboriginal Cultural Heritage Management Plan conditions .....	4
1.6 Contributors.....	5
<b>2 Environmental requirements .....</b>	<b>9</b>
2.1 Relevant legislation and guidelines .....	9
2.2 Development consents and permits.....	9
2.3 Commitment to cultural heritage preservation.....	9
2.3.1 Tangible Aboriginal cultural heritage .....	10
2.3.2 Intangible Aboriginal cultural heritage.....	10
2.3.3 Statutory .....	10
2.3.4 Values .....	10
<b>3 Existing environment .....</b>	<b>12</b>
3.1 Aboriginal cultural heritage .....	12
<b>4 Environmental aspects and impacts .....</b>	<b>16</b>
4.1 Aboriginal heritage impacts .....	16
<b>5 Consultation .....</b>	<b>18</b>
5.1 Aboriginal consultation undertaken as part of the project approval .....	18
5.1.1 Ongoing Aboriginal consultation.....	18
5.2 Consultation undertaken with Heritage NSW as part of the project approval.....	20
<b>6 Environmental mitigation measures.....</b>	<b>21</b>
6.1 Operational related measures .....	21
6.1.1 Strategy 1: Undertaking ongoing consultation with Aboriginal stakeholders regarding the implementation and subsequent review of the plan .....	22
6.1.2 Strategy 2: Providing a revised assessment of significance for the project area based on the outcomes of works undertaken under AHIP 5060 .....	22
6.1.3 Strategy 3: Ensuring that all relevant conditions of AHIP 5060 have been satisfied .....	22
6.1.4 Strategy 4: The completion of any additional salvage works, including cultural monitoring during ground disturbing works.....	23
6.1.5 Strategy 5: The completion of any test or salvage excavations works within the areas associated with secondary road connection and/or tree removal .....	23
6.1.6 Strategy 6: The completion of any monitoring within the areas associated with tree removal area .....	25



6.1.7	Strategy 7: Ensuring the protection and ongoing management of sites AHIMS 58-4-1466/Moruya - Scarred Tree 1, AHIMS 58-5-1467/Moruya scarred tree 2, and AHIMS 58-4-1468/Moruya scarred tree 3.....	25
6.1.8	Strategy 8: Short and long term management of Aboriginal objects salvaged during the project and in accordance with AHIP 5060.....	25
6.1.9	Strategy 9: Procedure to follow in the event of the discovery of human remains .....	26
6.1.10	Strategy 10: Procedure to follow in the event of unexpected Aboriginal finds .....	27
6.1.11	Strategy 11: Procedure to follow in the event of unexpected non-Aboriginal finds.....	30
6.1.12	Strategy 12: Register any newly identified Aboriginal objects or sites in the AHIMS database .....	30
6.1.13	Strategy 13: Procedure to follow for conducting further archaeological and heritage assessments in any disturbance areas where assessment has not been carried out .....	30
6.1.14	Strategy 14: Heritage Induction for all employees, contractors and sub-contractors .....	31
6.1.15	Strategy 15: Procedures and requirements for ongoing review and revision of the plan, as required .....	31
6.1.16	Strategy 16: Contingency plan for impact to Aboriginal heritage sites outside of the development area .....	31
6.1.17	Strategy 17: Protection of Aboriginal heritage sites outside of the development disturbance area .....	31
<b>7</b>	<b>Compliance management.....</b>	<b>33</b>
7.1	Roles and responsibilities .....	33
7.2	Record keeping .....	33
7.3	Incidents .....	33
<b>8</b>	<b>Training and awareness .....</b>	<b>34</b>
<b>9</b>	<b>Review and improvement .....</b>	<b>35</b>
9.1	Continuous improvement .....	35
9.2	ACHMP update and amendment.....	35
9.2.1	Minor permissible amendments.....	35
	<b>References.....</b>	<b>37</b>
	<b>Appendices .....</b>	<b>38</b>
<b>Appendix 1</b>	<b>Identifying Aboriginal objects and site types .....</b>	<b>39</b>
<b>Appendix 2</b>	<b>Identifying non-Aboriginal heritage items.....</b>	<b>42</b>
<b>Appendix 3</b>	<b>Resume of report authors .....</b>	<b>47</b>
<b>Appendix 4</b>	<b>Aboriginal consultation .....</b>	<b>48</b>
	First draft ACHMP review.....	48
	Second draft ACHMP review .....	50
<b>Appendix 5</b>	<b>Heritage NSW consultation.....</b>	<b>52</b>
<b>Appendix 6</b>	<b>Chance/Unexpected Finds Protocol .....</b>	<b>55</b>
<b>Appendix 7</b>	<b>Management and mitigation measures for the Aboriginal heritage sites within the study area .....</b>	<b>56</b>
<b>Appendix 8</b>	<b>ASIRFs .....</b>	<b>57</b>

**Appendix 9      AHIP conditions and AHIP 5060 ..... 58**

**Tables**

Table 1	Heritage Management Plan conditions .....	5
Table 2	Aboriginal heritage sites associated with the project.....	12
Table 3	Impacts to Aboriginal heritage sites.....	16
Table 4	Registered Aboriginal Parties for the Eurobodalla Regional Hospital project .....	18
Table 5	Operational related measures.....	21
Table 6	Roles and responsibilities and contact details .....	33

**Figures**

Figure 1	Location of the study area.....	6
Figure 2	Study area detail .....	7
Figure 3	Proposed development .....	8
Figure 4	AHIMS within the vicinity of the study area .....	14
Figure 5	No-go areas .....	15

# 1 Introduction

---

This Aboriginal Cultural Heritage Management Plan (ACHMP) manages the impacts to Aboriginal heritage during construction of the Eurobodalla Regional Hospital project. This ACHMP has been prepared to address the Conditions of Consent (CoC), that will be issued by Secretary for the Department of Planning Housing and Infrastructure (State Significant Development (SSD) (SSD-56989722)).

This ACHMP has been prepared in accordance with the *Environmental Planning and Assessment Act 1979* (EP&A Act) and the *National Parks and Wildlife Act 1974* (NPW Act).

## 1.1 Project background

Approval for this project has been undertaken through two pathways. A Review of Environmental Factors (REF) under Part 5 of the EP&A Act allowed for archaeological salvage excavations to be undertaken as part of the Eurobodalla Regional Hospital Soil Conservation Works. The proposed development has been assessed as an SSD (SSD-56989722), which includes the construction works that will be undertaken including site establishment and preparation, construction of a three-storey hospital and associated road, infrastructure, and landscaping works.

Biosis was commissioned by RP Infrastructure on behalf of Health Infrastructure (HI) to undertake the archaeological salvage works for the proposed development of Lot 2 DP 128576 in the Eurobodalla Shire (the study area) into the new Eurobodalla Regional Hospital (Figure 1 and Figure 2).

The purpose of the salvage excavations was to salvage the proposed development site and assess the significance and extent of Aboriginal Heritage Information Management System (AHIMS) 58-4-1103/Moruya Site 1, AHIMS 58-4-1104/Moruya Site 2, AHIMS 58-4-1317/BF-SU7, AHIMS 58-4-1318/BF-SU9, AHIMS 58-4-1319/BF-SU10, AHIMS 58-4-1320/BF-SU11 located within the study area.

The Aboriginal Cultural Heritage Assessment Report (ACHAR) (Comber Consultants 2022) and Aboriginal Archaeological Assessment and Research Design and Methodology (RD&M), Historical Archaeological Assessment (HAA) and Statement of Heritage Impact (SoHI) for this project were completed by Comber Consultants, which provided an assessment of significance of the study area and a series of recommendations for the proposed developments.

In terms of Aboriginal heritage, Comber Consultants (2022) assessed the study area to be of social, historic, and aesthetic importance to both the local and broader Aboriginal community with the potential to yield scientific, rarity, and representative value upon further investigations. Field investigations and test excavations were not completed as part of this ACHAR, which utilised the results of previous excavations completed by Dr Julie Dibden in 2005 (Dibden 2005) as part of a proposed redevelopment of Braemar Farm, which encapsulates the current study area. Dibden's assessment area incorporated additional land to the west and north-west, that is outside of the study area for this ACHMP. The test excavations were undertaken in accordance with a s87 preliminary research permit (#2249). Dr Dibden's assessment resulted in the identification of the AHIMS sites listed above. Salvage was recommended if the sites could not be avoided any future development.

Aboriginal Heritage Impact Permit (AHIP) 5060 was issued to Health Administration Corporation on 23 March 2023 to allow for archaeological salvage and harm through the proposed development for the Eurobodalla Regional Hospital Soil Conservation Works.

The HAA and SoHI completed by Comber Consultants included historical research undertaken, the results of which indicated that the study area has been largely used for grazing and agricultural activities (Comber Consultants 2021, Comber Consultants 2023a). The impacts to the study area for the proposed works associated with the SSD application were found to be acceptable, as there are no items of heritage significance within the study area that will be impacted by these activities, provided that a heritage interpretation plan and unexpected finds policy is implemented to identify and record any historical archaeological material that may be encountered during the proposed works.

SSD consent for the project was granted on 27 May 2024. A northern access road, which will provide emergency access and exits from the hospital, as shown in Figure 3. This road lies outside the study area included in the above mentioned heritage assessments. Archaeological excavations were unable to be conducted in this area until SSD consent was granted. Biosis and RP Infrastructure, on behalf of HI, are in the preliminary stages of organising this phase of the project.

In addition, a helipad is proposed to be constructed within the northern portion of the hospital site near trees. In order to accommodate a safe helicopter flight path to and from the proposed helipad the trees will have to be removed. The preferred method of removing the trees from the helicopter flight path is one that limits ground disturbance in the area (i.e. cutting the trees and leaving the stumps in place). However, should it be determined that this is not feasible, and the tree stumps need to be removed, monitoring of the removal or archaeological excavations may be undertaken in this area. Mitigation measures that include methodologies for archaeological excavations and monitoring have been provided in this ACHMP.

This ACHMP does not include measures for non-Aboriginal heritage.

The assessments should be read in conjunction with the reports referenced in this ACHMP which have been included in the Environmental Impact Statement (EIS) as:

- *Eurobodalla Regional Hospital Soil Conservation Works. Aboriginal Cultural Heritage Assessment Report* (Comber Consultants 2022).
- *Soil Conservation, Research Design, March 2023, Version: 1.2022* (Comber Consultants 2023b).
- *Eurobodalla Health Service Redevelopment. Historical Archaeological Assessment* (Comber Consultants 2021).
- *Eurobodalla Regional Hospital. Statement of Heritage Impact* (Comber Consultants 2023a).
- *Eurobodalla Regional Hospital (SSD-56989722): Salvage Report* (Biosis, in preparation).

## 1.2 Study area

The study area is located at Moruya, approximately 25 kilometres south-west of Batemans Bay central business district (Figure 1). It encompasses 18.5 hectares of private land.

The study area is within the:

- Eurobodalla Shire Local Government Area (LGA).
- Parish of Moruya.
- County of Dampier.

The study area comprises of Lot 2 DP 128576, part of Lot 69 DP 752151, and the northern road reserve (part of the Albert Street road reserve) (refer to Figure 2). It is bounded by private property to the north, Princes Highway to the south, and greenfield land to the east and west.



### 1.3 General scope of works

The general scope of works for the construction and operation of the Eurobodalla Regional Hospital includes (Figure 3):

- Site establishment and preparation, including bulk earthworks, tree removal, environmental clearing and cut and fill.
- Construction and operation of a three-storey hospital with four wings, which includes the following departments:
  - Emergency Department (including flexible mental health beds).
  - Medical Imaging.
  - Operating Theatres.
  - Intensive Care Unit.
  - Pathology.
  - Pharmacy.
  - Medical and surgical in-patient units.
  - Rehabilitation and Palliative Care in-patient units
  - Women's Health and Paediatrics.
  - Ambulatory Care for community outpatient services.
  - Administration including Education and Training.
  - Front of House including Retail.
  - Back of House including Mortuary.
- Internal road network and access from Princes Highway.
- Secondary road access (controlled access for Emergency vehicles only) from Caswell Street to north of the project site.
- At grade car parking.
- Loading dock.
- Helipad.
- Ancillary landscaping including the Walawanni, Meeting Place and Healing Place.

### 1.4 Purpose and objectives

The purpose of this ACHMP is to describe how Aboriginal heritage will be protected and managed by Health Infrastructure during the construction of the project. The key objective of the ACHMP is to ensure that impacts to Aboriginal heritage are minimised and within the scope permitted by the project approval. Specific objectives include:

- Be prepared by suitably qualified and experienced persons.
- Be prepared in consultation with the Registered Aboriginal Parties (RAPs).

- Be reviewed by Heritage NSW, Department of Climate Change, Energy, the Environment and Water (Heritage NSW).
- Include a description of the measures that would be implemented for:
  - Undertaking ongoing consultation with the RAPs during the implementation and any subsequent review of the plan.
  - Providing a revised assessment of significance for the project area based on the outcomes of works undertaken under AHIP 5060.
  - Ensuring that all relevant conditions of AHIP 5060 have been satisfied.
  - The completion of any additional salvage works, including cultural monitoring during ground disturbing works.
  - Ensuring the protection and ongoing management of sites AHIMS 58-4-1466/Moruya - Scarred Tree 1, AHIMS 58-5-1467/Moruya scarred tree 2, and AHIMS 58-4-1468/Moruya scarred tree 3.
  - Short and long term management of Aboriginal objects salvaged during the project and in accordance with AHIP 5060.
  - The management of any unexpected Aboriginal objects (including human skeletal remains), with these measures to be prepared in accordance with the guidelines and standards specified by Heritage NSW and to include the requirement to register any newly identified Aboriginal objects or sites in the AHIMS database.
- Include requirements to undertake further Aboriginal cultural heritage assessment for any areas outside the current project footprint and/or where the extent of impacts may be increased during current or future phases of the project.
- Include provision for workers on site to receive suitable heritage inductions prior to carrying out any development on site, with records to be kept of these inductions.
- Include procedures and requirements for ongoing review and revision of the plan, as required.

This ACHMP should be read in conjunction with the following documents:

- *Eurobodalla Regional Hospital Soil Conservation Works. Aboriginal Cultural Heritage Assessment Report* (Comber Consultants 2022).
- *Soil Conservation, Research Design, March 2023, Version: 1.2022* (Comber Consultants 2023b).
- Eurobodalla Regional Hospital (SSD-56989722): Salvage Report (Biosis in preparation).

## 1.5 Aboriginal Cultural Heritage Management Plan conditions

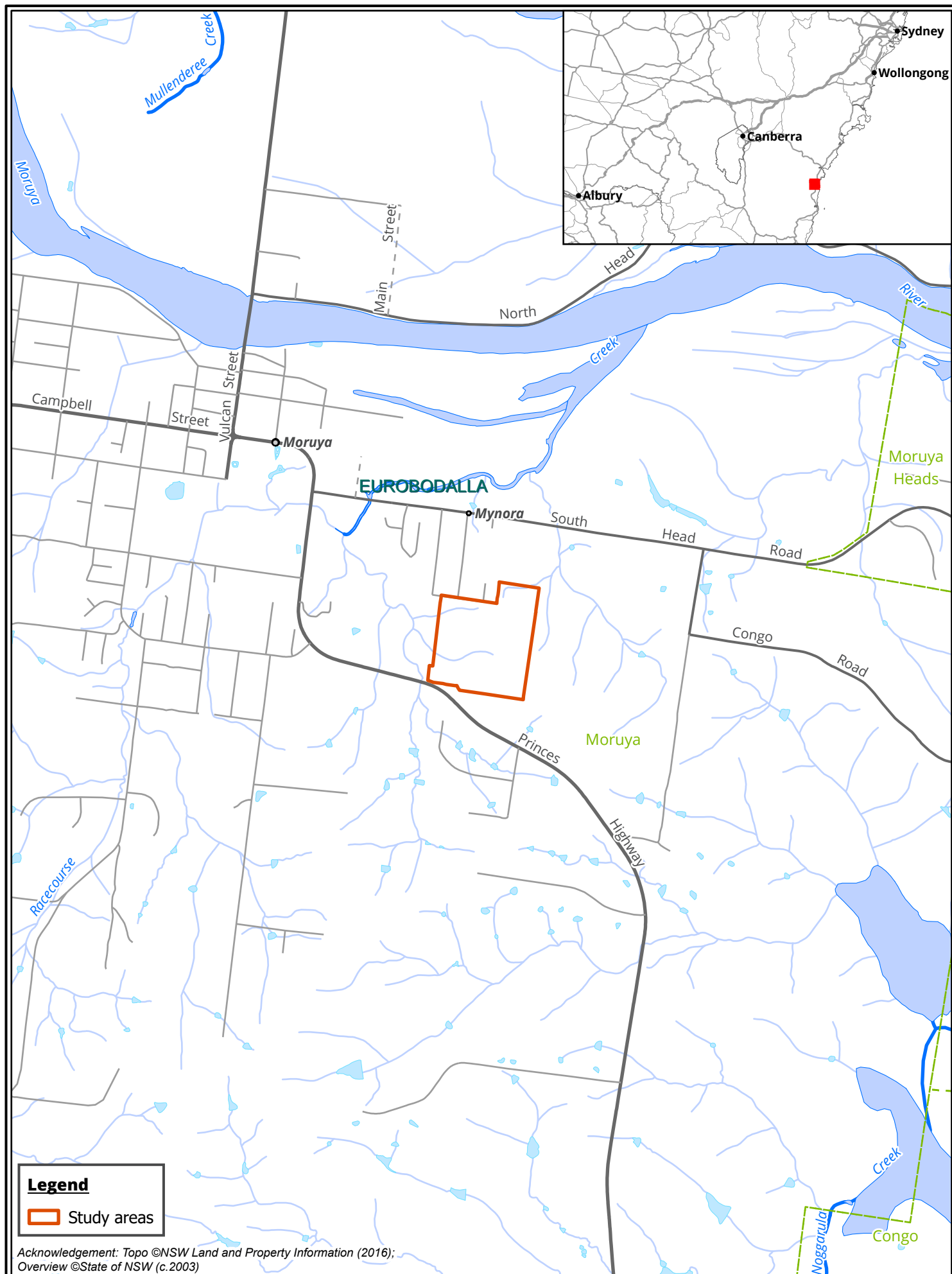
The conditions of the ACHMP and their location within this document are described below in Table 1.

**Table 1 Heritage Management Plan conditions**

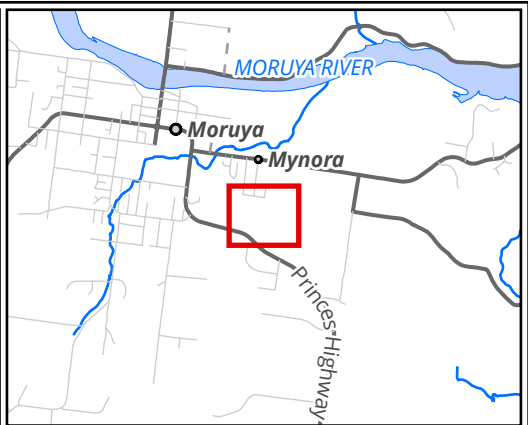
Part	Description	Location within ACHMP
a)	Be prepared by suitably qualified and experienced persons.	Appendix 3
b)	Be prepared in consultation with the RAPs.	Section 5.1.1 and Appendix 4
c)	Be reviewed by Heritage NSW.	Appendix 5
d)	Include a description of the measures that would be implemented for: <ul style="list-style-type: none"> <li>– Undertaking ongoing consultation with the RAPs during the implementation and any subsequent review of the plan.</li> <li>– Providing a revised assessment of significance for the project area based on the outcomes of works undertaken under AHIP 5060.</li> <li>– Ensuring that all relevant conditions of AHIP 5060 have been satisfied.</li> <li>– The completion of any additional salvage works, including cultural monitoring during ground disturbing works.</li> <li>– Ensuring the protection and ongoing management of sites AHIMS 58-4-1466/Moruya - Scarred Tree 1, AHIMS 58-5-1467/Moruya scarred tree 2, and AHIMS 58-4-1468/Moruya scarred tree 3.</li> <li>– Short and long term management of Aboriginal objects salvaged during the project and in accordance with AHIP 5060.</li> <li>– The management of any unexpected Aboriginal objects (including human skeletal remains), with these measures to be prepared in accordance with the guidelines and standards specified by Heritage NSW and to include the requirement to register any newly identified Aboriginal objects or sites in the AHIMS database</li> </ul>	Section 6.1.1 Section 6.1.2 Section 6.1.3 Section 6.1.4 Section 0 Section 4, 0 and Figure 5 Section 6.1.8 Sections 6.1.9, 6.1.10, 6.1.11 and 6.1.12
e)	Include requirements to undertake further Aboriginal cultural heritage assessment for any areas outside the current project footprint and/or where the extent of impacts may be increased during current or future phases of the project.	Section 6.1.13
f)	Include provision for workers on site to receive suitable heritage inductions prior to carrying out any development on site, with records to be kept of these inductions.	Section 6.1.14
g)	Include procedures and requirements for ongoing review and revision of the plan, as required.	Section 6.1.15

## 1.6 Contributors

This ACHMP was prepared by Anthea Vella, Team Leader – Heritage (NSW) at Biosis. This report has been reviewed by Samantha Keats, Manager - Heritage (NSW) at Biosis.







- Legend**
- Study area
  - Lot


**Figure 2 Study area**

020406080100

Metres

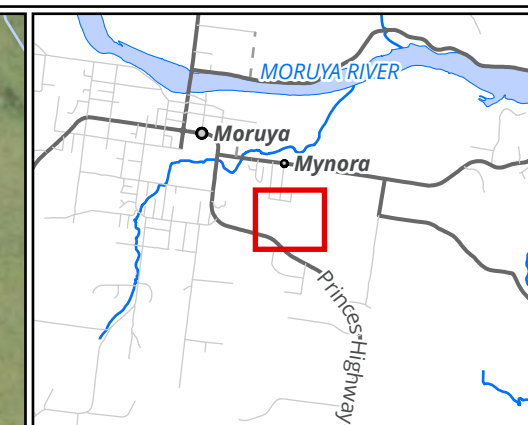
Scale: 1:2,500 @ A3

Coordinate System: GDA 1994 MGA Zone 56



37940,  
Date: 17 June 2024,  
Prepared for: AV, Prepared by: AM, Last edited by: jturner  
Layout: 37940\_HHA\_F2\_StudyArea  
Project: P:\37900s\37940\Mapping\  
37940\_EurobodallaHospital.aprx





# Legend

Study area

Figure 3 Proposed development

0 20 40 60 80 100

Metres

Scale: 1:2,500@ A3  
Coordinate System:  
GDA 1994 MGA Zone 56



Matter: 37940, Date: 17 June 2024,  
Prepared for: AV, Prepared by: AM, Last edited by: jturner  
Location: P:\37900s\37940\Mapping\  
37940\_EurobodallaHospital,  
Layout: 37940\_HHA\_F3\_ProposedWorks



## 2 Environmental requirements

---

The following section outlines the environmental requirements of the project including relevant legislation and guidelines that have been used to assist in the formulation of this ACHMP.

### 2.1 Relevant legislation and guidelines

Legislation relevant to heritage management includes:

- EP&A Act.
- NPW Act.

The main guidelines, specifications and policy documents relevant to this ACHMP include:

- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010a) (consultation requirements)
- *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* (2013a).
- *Code Of Practice for the Investigation of Aboriginal Objects in New South Wales 2010* (DECCW 2010b) (the Code).

### 2.2 Development consents and permits

As noted in Section 1, this project has one development consent and one Aboriginal heritage permit for the project:

- SSD-56989722
- AHIP 5060

The proposed development has been assessed as an SSD (SSD-56989722), which includes the construction works that will be undertaken including site establishment and preparation, construction of a three-storey hospital and associated road, infrastructure, and landscaping works.

AHIP 5060 was issued to Health Administration Corporation on 23 March 2023 to allow for archaeological salvage and harm through the proposed development for the Eurobodalla Regional Hospital Soil Conservation Works. Early works for the project were undertaken for the REF approval, and the AHIP is for a duration of 5 years (expires on 23 March 2028). The AHIP is included in Appendix 9 and includes a figure of the AHIP area.

### 2.3 Commitment to cultural heritage preservation

Aboriginal people have inhabited the Australian continent for the last 50,000 years and the NSW area for over 42,000 years (Allen & O'Connell 2003, Bowler et al. 2003). These dates are subject to continued revision as further evidence of Aboriginal cultural heritage is discovered and as more research of this evidence is conducted.

Without being part of the Aboriginal culture, and the productions of this culture, it is not possible for non-Aboriginal people to fully understand their meaning to Aboriginal people – only to move closer towards

understanding this meaning with the help of the Aboriginal community. Similarly, definitions of Aboriginal culture and cultural heritage without this involvement constitute outsider interpretations.

With this preface, Aboriginal cultural heritage broadly refers to things that relate to Aboriginal culture and hold cultural meaning and significance to Aboriginal people (DECCW 2010a). There is an understanding in Aboriginal culture that everything is interconnected. In essence, Aboriginal cultural heritage can be viewed as potentially encompassing any part of the physical and/or mental landscape, that is, 'Country' (DECCW 2010a).

Aboriginal people's interpretation of cultural value is based on their 'traditions, observance, lore, customs, beliefs and history' (DECCW 2010a). The things associated with Aboriginal cultural heritage are continually and actively being defined by Aboriginal people (DECCW 2010a). These things can be associated with traditional, historical or contemporary Aboriginal culture (DECCW 2010a).

### 2.3.1 Tangible Aboriginal cultural heritage

Three categories of tangible Aboriginal cultural heritage may be defined as:

- Things that have been observably modified by Aboriginal people.
- Things that may have been modified by Aboriginal people but no discernible traces of that activity remain.
- Things never physically modified by Aboriginal people (but associated with Dreamtime Ancestors who shaped those things).

### 2.3.2 Intangible Aboriginal cultural heritage

Examples of intangible Aboriginal cultural heritage would include memories of stories and 'ways of doing', which would include language and ceremonies (DECCW 2010a).

### 2.3.3 Statutory

Currently Aboriginal cultural heritage, as statutorily defined by the NPW Act, consists of objects and places.

Aboriginal objects are defined as:

*'any deposit, object or material evidence...relating to the Aboriginal habitation of the area that comprises NSW, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains.'*

Aboriginal places are defined as a place that is or was of special Aboriginal cultural significance. Places are declared under Section 84 of the NPW Act.

### 2.3.4 Values

Aboriginal cultural heritage is broadly valued by Aboriginal people as it is used to define their identity as both individuals and as part of a group (DECCW 2010a). More specifically it is used:

- to provide a:
  - 'Connection and sense of belonging to Country' (DECCW 2010a).
  - Link between the present and the past (DECCW 2010a).

- As a learning tool to teach Aboriginal culture to younger Aboriginal generations and the general public (DECCW 2010a).
- As further evidence of Aboriginal occupation prior to European settlement for people who do not understand the magnitude to which Aboriginal people occupied the continent (see also (DECCW 2010a)).

The NSW government and all of its entities are committed the protection and preservation of Aboriginal cultural heritage in NSW and on the Eurobodalla Regional Hospital project.

### 3 Existing environment

The following sections summarise what is known about Aboriginal heritage within and adjacent to the study area based on information provided in:

- *Eurobodalla Regional Hospital Soil Conservation Works. Aboriginal Cultural Heritage Assessment Report* (Comber Consultants 2022).
- *Soil Conservation, Research Design, March 2023, Version: 1.2022* (Comber Consultants 2023b).
- *Eurobodalla Regional Hospital (SSD-56989722): Salvage Report* (Biosis, in preparation).

#### 3.1 Aboriginal cultural heritage

The Aboriginal cultural heritage values were subject to assessment through the following processes:

- Literature and database review.
- Archaeological survey.
- Test excavations.
- Salvage excavations.
- Aboriginal consultation.
- Assessment of significance and proposed impacts.

Based upon these tasks, eleven known Aboriginal heritage sites associated with the project have been identified (four are located outside of the study area), these are detailed in Table 2 and their locations are identified in Figure 4 and no-go areas identified on Figure 5. The no-go areas have been designated in order to protect the scarred trees during construction activities (AHIMS 58-4-1466/Moruya Scarred Tree 1, AHIMS 58-5-1467/Moruya scarred tree 2, AHIMS 58-4-1468/Moruya scarred tree 3). One of these sites, AHIMS 58-4-1261/Lot 69 South Head Road 1, was not included in the initial assessments by Comber Consultants (2022, 2023b) and was not assessed as part of the SSD EIS. As recommended by Heritage NSW on 6 June 2024, AHIMS 58-4-1261/Lot 69 South Head Road 1 has been added to this ACHMP as a site that may require management. All Aboriginal heritage sites have been recorded in accordance with the Code, submitted to the Heritage NSW and listed within the AHIMS database.

**Table 2 Aboriginal heritage sites associated with the project**

AHIMS No.	Site	Description	Significance
<b>AHIMS 58-4-1466</b>	Moruya - Scarred Tree 1	Scar tree	High
<b>AHIMS 58-5-1467</b>	Moruya scarred tree 2	Scar tree	High
<b>AHIMS 58-4-1468</b>	Moruya scarred tree 3	Scar tree	High
<b>AHIMS 58-4-1103</b>	Moruya Site 1	Isolated artefact	Low
<b>AHIMS 58-4-1104</b>	Moruya Site 2	Artefact scatter	Low
<b>AHIMS 58-4-1317</b>	BF-SU7	Sub-surface isolated artefact	Low
<b>AHIMS 58-4-1318</b>	BF-SU9	Sub-surface artefact scatter	Low
<b>AHIMS 58-4-1319</b>	BF-SU10	Sub-surface artefact scatter	High



AHIMS No.	Site	Description	Significance
AHIMS 58-4-1320	BF-SU11	Sub-surface artefact scatter	High
AHIMS 58-4-1580	Eurobodalla Site Complex 1	Sub-surface artefact scatter	High
AHIMS 58-4-1261	Lot 69 South Head Road 1	Sub-surface artefact scatter	TBC

**Figure 4 AHIMS within the vicinity of the study area**

**\*\*THIS PAGE HAS BEEN REMOVED FOR PUBLIC EXHIBITION. THIS FIGURE CAN BE PROVIDED UPON REQUEST\*\***

## **Figure 5 No-go area**

**\*\*THIS PAGE HAS BEEN REMOVED FOR PUBLIC EXHIBITION. THIS FIGURE CAN BE PROVIDED UPON REQUEST\*\***

## 4 Environmental aspects and impacts

The key construction activities and the associated potential impacts to Aboriginal heritage values were identified through a risk management approach. The consequence and likelihood of each activity's impact on the environment was assessed to prioritise its significance.

### 4.1 Aboriginal heritage impacts

The potential impacts on Aboriginal heritage recordings include:

- Direct impacts and disturbance to the entire site or the majority of a site containing Aboriginal objects due to the construction of the project, this can be complete or partial.
- Indirect impacts to Aboriginal objects or cultural values, such as from development related changes to the landscape or scenic context of a site or item.

Impacts to Aboriginal heritage sites as outlined in:

- *Eurobodalla Regional Hospital Soil Conservation Works. Aboriginal Cultural Heritage Assessment Report* (Comber Consultants 2022).
- *Soil Conservation, Research Design, March 2023, Version: 1.2022* (Comber Consultants 2023b).
- *Eurobodalla Regional Hospital (SSD-56989722): Salvage Report* (Biosis, in preparation).

Impacts to Aboriginal heritage sites are summarised in Table 3 and have also been included in Appendix 7.

**Table 3** Impacts to Aboriginal heritage sites

AHIMS site no.	Site name	Significance	Type of harm	Degree of harm	Consequence of harm
<b>AHIMS 58-4-1466</b>	Moruya - Scarred Tree 1	Scar tree	Nil	Nil	No loss of value
<b>AHIMS 58-5-1467</b>	Moruya scarred tree 2	Scar tree	Nil	Nil	No loss of value
<b>AHIMS 58-4-1468</b>	Moruya scarred tree 3	Scar tree	Nil	Nil	No loss of value
<b>AHIMS 58-4-1103</b>	Moruya Site 1	Isolated artefact	Direct	Total	Total loss of value
<b>AHIMS 58-4-1104</b>	Moruya Site 2	Artefact scatter	Direct	Total	Total loss of value
<b>AHIMS 58-4-1317</b>	BF-SU7	Sub-surface isolated artefact	Direct	Total	Total loss of value
<b>AHIMS 58-4-1318</b>	BF-SU9	Sub-surface artefact scatter	Direct	Total	Total loss of value
<b>AHIMS 58-4-1319</b>	BF-SU10	Sub-surface artefact scatter	Direct	Total	Total loss of value
<b>AHIMS 58-4-1320</b>	BF-SU11	Sub-surface artefact scatter	Direct	Total	Total loss of value

AHIMS site no.	Site name	Significance	Type of harm	Degree of harm	Consequence of harm
<b>AHIMS 58-4-1580</b>	Eurobodalla Site Complex 1	Sub-surface artefact scatter	Direct	Total	Total loss of value
<b>AHIMS 58-4-1261</b>	Lot 69 South Head Road 1	Sub-surface artefact scatter	Direct	Total	Total loss of value

In the event that additional disturbance is anticipated to occur outside of the proposed works areas, then these disturbances will need to undergo additional heritage assessment and impact mitigation processes prior to the commencement of any associated works. It is likely that any additional impacts outside of the areas surveyed in the reports listed above would need to be assessed as a modification to the existing approval.



## 5 Consultation

### 5.1 Aboriginal consultation undertaken as part of the project approval

Consultation and collaboration with RAPs has been integral to the assessment and management of Aboriginal cultural heritage for the project. Consultation undertaken to date is outlined in the ACHAR completed for the project (Comber Consultants 2022), and Appendix 4. Aboriginal community consultation has been undertaken in accordance with the consultation requirements (DECCW 2010a).

#### 5.1.1 Ongoing Aboriginal consultation

The list of RAPs for the project is included in Table 4 below.

**Table 4 Registered Aboriginal Parties for the Eurobodalla Regional Hospital project**

No.	Organisation
1	Cobowra LALC
2	South Coast People c/o NTS Corp
3	Thoorga Thoorga
4	Didge Ngunawal Clan
5	Barraby Cultural Services
6	South Coast Elders Group
7	Goobah
8	Eurobodalla Regional Hospital Connecting with Country Project Working Group (ERH CwC PWG)
9	Confidential Party No. 1
10	Confidential Party No. 2
11	Confidential Party No. 3
12	Badu
13	Bidawal
14	Bilinga
15	Birrungal
16	Bullawaya
17	Bulling Gang
18	Curwur Murre
19	Dharug
20	Djanaba Gaxabara
21	Elouera
22	Eora
23	Gadung
24	Gangangarra

No.	Organisation
25	Garranga Bumarri
26	Golangaya
27	Gulla Gunar
28	Gunyyu
29	Kuringgai
30	Munyunga
31	Murrin
32	Murrumbul
33	Ngario
34	Ngunawal
35	Nundagurri
36	Tharawal
37	Thauaira
38	Walbunja Elders
39	Hika Tekowhai
40	Wandandian
41	Wingikara
42	Woka Aboriginal Corporation
43	Ngarigo Elders

### Long-term care and control of all Aboriginal objects salvaged under AHIP 5060

Consultation regarding the long-term care and control of all Aboriginal objects salvaged under the AHIP has determined that reburial on-site is the preferred method. A report outlining the consultation process undertaken for the project is included in Appendix 4. All Aboriginal objects salvaged under AHIP 5060 are currently stored in a locked cabinet at the Biosis Wollongong office (30 Wentworth Street, Port Kembla NSW 2505).

Consultation with the Aboriginal community for this project has also identified that community would like to have the AHIMS sites identified by this assessment also have community contact details listed on the AHIMS site card in conjunction with the consulting archaeologist. The AHIMS site cards associated with this project can be found in Appendix 8. As part of the consultation with the RAPs, Biosis is requesting feedback on this, and suggests that Cobowra Local Aboriginal Land Council's contact details are included (193 Vulcan Street/PO Box 204, Moruya NSW 2537, (02) 4474 4188).

### AHIP 5060 mailout

A copy of AHIP 5060 was provided to RAPs on 31 October 2023. A copy of this consultation has been included in Appendix 4.

## Project update

A project update was sent out to all RAPs on 27 March 2023 in order to keep consultation current. A copy of this correspondence has been included in Appendix 4.

## Connecting with Country meetings

All RAPs are invited to bi-monthly Connecting with Country (CwC) meetings for the project. These meetings are organised by the CwC Project Working Group (PWG).

## ACHMP—first draft review

The draft ACHMP was sent out to all RAPs on 9 May 2024 in order to provide the RAPs the opportunity to review and comment on the document. RAPs were given 28 days to respond. A copy of this correspondence has been included in Appendix 4.

Cobowra LALC contacted Biosis on 14 May 2024 via phone, to discuss the ACHMP and Heritage Interpretation Strategy (HIS). Biosis confirmed that there would be a meeting after consultation closure to further discuss interpretation options. Cobowra LALC also raised that comments had been provided regarding artefact repatriation options by SLHD. Biosis is in the process of obtaining this correspondence and will include it in the ACHMP once received.

One group responded on 17 May 2024 regarding the ACHMP and HIS—the comments received were in relation to the HIS only and will be provided in the HIS document.

Didge Ngunawal Clan responded on 30 May 2024 asking to be kept updated on the projects progress.

No further comments were received.

## ACHMP—second draft review

Following communications with Heritage NSW, the draft ACHMP was updated to include additional sites, protocols and mitigation measures. A copy of the second draft of the ACHMP will be sent out to the RAPs for 28 day review. Following the close of this period this section will be updated. A copy of this correspondence will be included in Appendix 4.

## 5.2 Consultation undertaken with Heritage NSW as part of the project approval

Heritage NSW has reviewed the draft ACHMP and provided comments on the draft ACHMP. Biosis' response to where the ACHMP has been updated is included in Appendix 5. A copy of the correspondence from Heritage NSW has also been included in Appendix 5.



## 6 Environmental mitigation measures

### 6.1 Operational related measures

Specific mitigation measures to address impacts on Aboriginal heritage are outlined in Table 5.

**Table 5 Operational related measures**

Strategy	Requirement	Personnel
1.	Undertaking ongoing consultation with the RAPs during the implementation and any subsequent review of the plan.	Heritage Consultant/Aboriginal community
2.	Providing a revised assessment of significance for the project area based on the outcomes of works undertaken under AHIP 5060.	Heritage Consultant
3.	Ensuring that all relevant conditions of AHIP 5060 have been satisfied.	Project Manager/ Heritage Consultant
4.	The completion of any additional salvage works, including cultural monitoring during ground disturbing works.	Project Manager/ Heritage Consultant
5.	The completion of any test or salvage excavations works within the areas associated with secondary road connection and/or tree removal	Project Manager/ Heritage Consultant
6.	The completion of any monitoring within the areas associated with secondary road connection and/or tree removal	Project Manager/ Heritage Consultant
7.	Ensuring the protection and ongoing management of sites AHIMS 58-4-1466/Moruya - Scarred Tree 1, AHIMS 58-5-1467/Moruya scarred tree 2, and AHIMS 58-4-1468/Moruya scarred tree 3.	Project Manager/ Construction Contractor/ Heritage Consultant
8.	Short and long term management of Aboriginal objects salvaged during the project and in accordance with AHIP 5060.	Project Manager/ Heritage Consultant
9.	Procedure to follow in the event of the discovery of human remains.	Construction contractor
10.	Procedure to follow in the event of unexpected Aboriginal finds.	Construction contractor
11.	Procedure to follow in the event of unexpected non-Aboriginal finds.	Construction contractor
12.	Register any newly identified Aboriginal objects or sites in the AHIMS database.	Heritage Consultant
13.	Procedure to follow for conducting further archaeological and heritage assessments in any disturbance areas where assessment has not been carried out.	Project Manager/Heritage Consultant
14.	Heritage Induction for all employees, contractors and sub-contractors.	Project Manager/ Heritage Consultant
15.	Procedures and requirements for ongoing review and revision of the plan, as required.	Project Manager

Strategy	Requirement	Personnel
16.	Contingency plan for impact to Aboriginal heritage sites outside of the development area.	Project Manager/ Construction contractor
17.	Protection of Aboriginal heritage sites outside of the development disturbance area.	Project Manager/ Construction contractor

### 6.1.1 Strategy 1: Undertaking ongoing consultation with Aboriginal stakeholders regarding the implementation and subsequent review of the plan

In consultation with Aboriginal stakeholders, the ACHMP will be prepared and reviewed by the RAPs prior to being finalised. The RAPs will review any subsequent updates of the ACHMP.

A strategy for consultation with the Aboriginal community for the ongoing management and conservation of Aboriginal cultural heritage within the study area for the construction of the Eurobodalla Regional Hospital project is to be developed. This will include providing updates every six months on the progress of the project to the RAPs.

As noted in Section 5.1.1, all RAPs are invited to bi-monthly CwC meetings for the project. These meetings are organised by the CwC PWG. This will continue throughout the construction of the project.

RAPs will continue to be involved in any monitoring of ground disturbing works (Section 6.1.6), any additional excavation works (Section 6.1.5) and the implementing the long-term management/ reburial of artefacts (Section 6.1.8) that may be undertaken under the ACHMP.

### 6.1.2 Strategy 2: Providing a revised assessment of significance for the project area based on the outcomes of works undertaken under AHIP 5060

The study area contains a widespread low density artefact deposit as well as several high-density subsurface deposits, located within a broadly sloping landform unit, approximately 640 metres south of Racecourse Creek and 1.3 kilometres south of Moruya River. A total of 2291 artefacts were recovered from 219 salvage pits each measuring 1 x 1 metre. Soil deposits are considered to have remained intact as impacts from previous disturbances (including historical vegetation clearance and grazing) are minimal.

The presence of artefacts within spits 1 to 6 (0–300 millimetres) suggests that the study area demonstrates ongoing periodic occupation by Aboriginal people. This region contains a variety of Aboriginal sites (including modified trees, potential archaeological deposits and isolated artefacts), suggesting that this landscape was heavily and commonly used by Aboriginal people. The archaeological deposit recovered throughout the study area contains many of the same artefact types and material as previous assessment within the region. Analysis of the assemblage suggested the presence of a high-density assemblage dating to the mid-Holocene period that showed potential activities such as backed artefact production occurring on site. The site was found to be consistent with surrounding sites in the area and was likely reflective of ongoing periodic occupation. The study area has been assessed as having high archaeological significance for this area.

### 6.1.3 Strategy 3: Ensuring that all relevant conditions of AHIP 5060 have been satisfied

A summary table with the conditions of AHIP 5060 and AHIP 5060 is included in Appendix 9. The outstanding AHIP 5060 conditions include:

- Condition 21: Reburial of artefacts identified as part of the salvage excavations.
- Condition 31, 32, and 33: The salvage report is currently being prepared and has been issued to the RAPs (for review and comment). The salvage report will be sent to Heritage NSW once the report has been finalised.

#### **6.1.4 Strategy 4: The completion of any additional salvage works, including cultural monitoring during ground disturbing works**

Any additional archaeological investigations must take place in accordance with the Code (DECCW 2010b) and in consultation with the Aboriginal community in accordance with the consultation requirements.

All salvage works or disturbance to Aboriginal heritage items must be undertaken in compliance with the conditions contained within AHIP 5060.

Cultural monitoring is to be undertaken during ground disturbing works. The construction contractor is to make provision for this.

#### **6.1.5 Strategy 5: The completion of any test or salvage excavations works within the areas associated with secondary road connection and/or tree removal**

Should it be determined that test excavations are required within the areas associated with secondary road connection and/or tree removal, they will occur in line with the below methodology. This methodology has been developed in line with the excavation methodology provided in AHIP 5060:

- Test excavations will be conducted in 1 by 1 metre units.
- The test pits will occur along transects at intervals of 30 metres or other justifiable and regular spacing.
- The test pits will be excavated by hand (inclusive of trowels, spades, and other hand tools).
- The test pits will be excavated in either 5 centimetre spits or stratigraphic units (whichever is smaller) to below the base of Aboriginal object-bearing units being the removal of the A-horizon soil deposit down to the sterile clay or bedrock layer (B-horizon).
- Test pits may be combined and excavated as necessary in 1 by 1 metre centimetre units for the purposes of further understanding site characteristics.
- All excavated soil will be wet sieved with 3 millimetre sieves. If artefacts smaller than 3 millimetres are identified, the sieve size will be reduced to 1 millimetre to ensure that any micro lithic fragments are retrieved.
- If dateable material is uncovered, samples will be recovered for absolute dating.
- All cultural material will be collected, bagged, and clearly labelled. They will be temporarily stored in the Biosis office for analysis (at 30 Wentworth Street, Port Kembla NSW 2505).
- For each test pit that is excavated, the following documentation will be taken:
  - Unique test pit identification number.
  - GPS coordinate of each test pit.
  - Munsell soil colour and texture.
  - Amount and location of cultural material within the deposit.



- Nature of disturbance where present.
- Stratigraphy.
- Archaeological features (if present).
- Photographic records.
- Spit records.
- Test excavation units will be backfilled as soon as practicable.
- An AHIMS Site Impact Recording form will be completed and submitted to the AHIMS Registrar for any sites impacted during test excavations.
- If suspected human remains are identified, works will immediately cease and the NSW Police and Heritage NSW will be notified.
- Test excavations will cease when enough information\* has been recovered to adequately characterise the objects present regarding their nature and significance.

*\*Enough information is defined by Heritage NSW as meaning “the sample of excavated material clearly and self-evidently demonstrates the deposit’s nature and significance. This may include things like locally or regionally high object density: presence of rare or representative objects: presence of archaeological features: or locally or regionally significant deposits stratified or not.” (DECCW 2010b, pp. 28).*

- Test excavation units measuring 1 by 1 metre will be expanded and salvage excavations will commence if any of the following information or criteria are met:
  - Higher relative artefact densities, with a minimum of density of five artefacts in a 1 by 1 metre pit.
  - Rare or unusual artefact types, such as backed blades or axe heads.
  - Unusual or non-local raw material types.
  - Archaeological features such as hearths, organic material, midden material or other cultural features e.g. knapping floors.
  - Evidence of contact archaeology (for example, flaked glass or flaked insulators).
  - Any other cultural feature or area of potential archaeological deposit identified by the Excavation Director or Registered Aboriginal Parties/Aboriginal community representatives as worthy of further investigation.

If test excavation units are required to be expanded and salvage excavations are required to commence, the below will also apply:

- Salvage excavations will continue in 1 by 1 metre expansions until the artefact density falls below five artefacts, or when the open area excavation pit reaches the extent of the disturbance footprint.

## STORAGE OF CULTURAL MATERIAL

Any cultural material identified during test excavations will be temporarily stored in the Biosis, Wollongong office for analysis (30 Wentworth Street, Port Kembla NSW 2505).

### 6.1.6 Strategy 6: The completion of any monitoring within the areas associated with tree removal area

Should predictive modelling determine that monitoring within the areas associated with tree removal activities is required then monitoring will occur in line with the below methodology. This methodology has been developed to align with the excavation methodology provided in AHIP 5060 where possible:

- Cultural monitoring to be undertaken by RAPs within the works corridor of the tree removal area.
- Mechanical excavations will occur within a 5 metre diameter to allow for the removal of each tree within the specified area in accordance with the following methodology:
  - Mechanical excavations will utilise an appropriately sized excavator to remove the tree, tree stump and root base.
  - Following mechanical removal of the tree, RAPs and an archaeologist will undertake an assessment of the area to record and collect any exposed Aboriginal objects.
  - Collection of Aboriginal objects during monitoring of mechanical excavation should follow the protocols for surface collection of artefacts outlined in AHIP 5060.
  - Any mechanically excavated soil will be placed to the side of each area for the duration of the mechanical excavations.
  - Should cultural material be identified during monitoring, any mechanically excavated soil is to be wet sieved using 3 millimetre sieves.
- Once the tree removal has occurred, and cultural collection and any required sieving has been completed, the area will be backfilled with clean soil as soon as practicable.
- In the event that human remains are discovered, the protocols regarding the discovery of human remains set out in Section 6.1.9 is to be followed.

#### STORAGE OF CULTURAL MATERIAL

Any cultural material identified during test excavations will be temporarily stored in the Biosis, Wollongong office for analysis (30 Wentworth Street, Port Kembla NSW 2505) and managed in accordance with the long term management strategy below.

### 6.1.7 Strategy 7: Ensuring the protection and ongoing management of sites AHIMS 58-4-1466/Moruya - Scarred Tree 1, AHIMS 58-5-1467/Moruya scarred tree 2, and AHIMS 58-4-1468/Moruya scarred tree 3

The boundary of the Eurobodalla Regional Hospital disturbance area will be clearly marked with fencing to ensure that no impacts can occur to AHIMS 58-4-1466/Moruya - Scarred Tree 1, AHIMS 58-5-1467/Moruya scarred tree 2, and AHIMS 58-4-1468/Moruya scarred tree 3. If any impacts to these sites occur, Section 6.1.16 is to be followed.

### 6.1.8 Strategy 8: Short and long term management of Aboriginal objects salvaged during the project and in accordance with AHIP 5060

Consultation regarding the long-term care and control of all Aboriginal objects salvaged under the AHIP has determined that reburial on-site is the preferred method. A report outlining the consultation process undertaken for the project is included in Appendix 4. All Aboriginal objects salvaged under AHIP 5060 are

currently stored in a locked cabinet at the Biosis Wollongong office (30 Wentworth Street, Port Kembla NSW 2505).

The exact method of reburial is yet to be determined. The method for reburial will be determined following consultation with RAPs, CwC PWG and the Aboriginal community. One possible method of reburial is:

- Representatives from the Aboriginal community and two heritage consultants will attend and undertake the artefact reburial.
- The artefacts will be reburied within the proposed reburial area:
  - The artefacts will be reburied in this area without plastic bags.
  - The final location for reburial will be decided by the representatives present on the day.
  - The depth will be dependent on the soils encountered and will aim to be between 300-600 millimetres in depth.
- Only hand tools will be used – shovel, mattock, crowbar (where necessary) – to excavate the reburial pit.
- A new site card will be lodged on AHIMS in accordance with the requirements of the Code.

As part of the review of this ACHMP feedback regarding the above methodology is sought. Additional considerations may include:

- A smoking ceremony to be led by the Elders in the community.
- The artefacts to be placed in paperbark for the reburial.

This section will be updated following the close of response on the draft ACHMP. The proposed reburial methodology will also be shared with the wider CwC PWG. Details of this consultation will also be provided once this has been completed.

### **6.1.9 Strategy 9: Procedure to follow in the event of the discovery of human remains**

If any suspected human remains are discovered within the study area, all activity must cease. The following process must be undertaken:

- Immediately cease all work at that location and not further move or disturb the remains.
- Notify the NSW Police on the Assistance Line on 131 444; and Heritage NSW, Environmental Line on 131 555 as soon as practicable and provide details of the remains and their location.
- RAPs for the project must be notified in the event that suspected Aboriginal ancestral remains are uncovered during any stage of the project.
- Establish an appropriate no-go area. This will need to be established in consultation with NSW Police, Heritage NSW and if necessary, a qualified archaeologist.
- Works will not be able to recommence within the location of the find until confirmation from NSW Police and Heritage NSW is obtained. If the remains are confirmed as not being human, then works may recommence. In the event that remains are human then consultation with NSW Police, Heritage NSW and the Aboriginal stakeholders to establish a plan of management is required.
- Works in the vicinity of the find will only be able to commence once the plan of management has been established and approval has been obtained from all relevant parties.



- Should any human remains be identified, this will trigger a review of this ACHMP in accordance with Section 9.2. Further consultation with the Aboriginal community will need to be undertaken in regard to repatriation of human remains.

#### 6.1.10 Strategy 10: Procedure to follow in the event of unexpected Aboriginal finds

In the event that unexpected Aboriginal objects or sites are located then an assessment will need to be made as to the significance of the object (Appendix 6). Appendix 1 contains guidelines around the identification of Aboriginal objects. The *National Parks and Wildlife Act 1974* defines an Aboriginal object as:

*'...any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains...'*

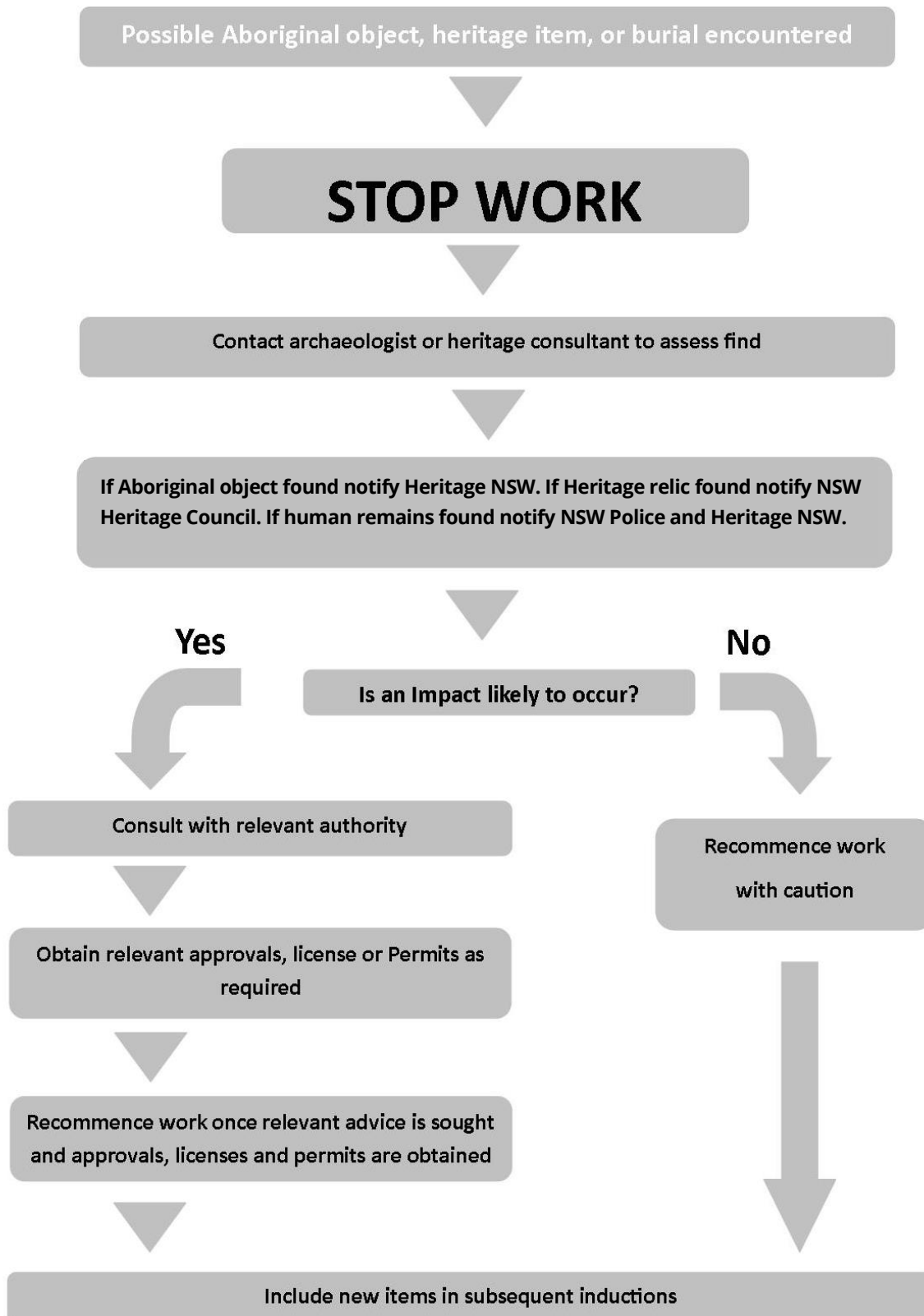
Heritage NSW requested that a proposed mechanism for salvage of unexpected Aboriginal objects (excluding ancestral remains), if identified, be prepared for the project (26 August 2023). Heritage NSW provided confirmation on 19 December 2023 that the below methodology addresses this request.

Salvage of isolated lithic artefacts and lithic artefact scatters have been undertaken under AHIP 5060. The following process should be followed with respect to unexpected finds not previously salvaged under AHIP 5060. This may include Aboriginal cultural heritage sites such as hearths, scarred trees, shell middens, Aboriginal gathering and resource locations and significant lithic objects including ground edge axes/adze and grinding stones.

The following process should be followed with respect to unexpected finds:

- Should any unexpected Aboriginal objects of those listed above be encountered during the works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist.
- A no-go area should be established around the suspected Aboriginal object, and clearly demarcated with flagging tape or similar.
- The archaeologist will investigate and assess the Aboriginal object to determine the nature, extent, and significance of the find. This will enable recommendations to be provided on how work can proceed and whether any further work is required. The archaeologist must supply written advice to the Project Manager within 24 hours stating:
  - A determination of whether the find is an Aboriginal object.
  - Advice on how the project is to proceed and whether the establishment of any no-go areas is necessary until further assessment.
  - A recommendation on further works that may be required and timeframe for completion of these works.
- Heritage NSW and Aboriginal stakeholders will be notified. This will include a statement concerning the find, management measures implemented and notification of any further works arising. Aboriginal stakeholders are to be involved in any further assessments or works as required.
- AHIMS site cards will be prepared for each new site identified and submitted to AHIMS in accordance with the Code.

- In the event that there is a dispute regarding the unexpected find further consultation and discussions will be held with the Aboriginal community to come to a resolution. This will be undertaken on a case by case basis.
- Should any Aboriginal objects be identified, this will trigger a review of the unexpected finds protocol.





### 6.1.11 Strategy 11: Procedure to follow in the event of unexpected non-Aboriginal finds

Where non-Aboriginal items are identified, an assessment will need to be made as to the significance of the item, by following the flow chart included in Section 6.1.10. Appendix 2 contains guidelines around the identification of non-Aboriginal heritage items. Non-Aboriginal heritage items may include archaeological 'relics' or other non-Aboriginal items (i.e. works, structures, buildings or movable objects). The *Heritage Act 1977* (Heritage Act) defines relics as '...any deposit, artefact, object or material evidence that relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and is of State or local heritage significance...'.

The following process should be followed with respect to unexpected items:

- Should any suspected non-Aboriginal items be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist.
- The archaeologist will investigate and assess the non-Aboriginal item to determine the nature, extent and significance of the find. This will enable recommendations to be provided on how work can proceed and whether any further work is required. The archaeologist must supply written advice to the Project Manager within 24 hours stating:
  - Determination of whether the find is a relic.
  - Advice on how the project is to proceed and whether the establishment of any no-go areas is necessary.
  - A recommendation on further works that may be required and timeframe for completion of these works.
- NSW Heritage Division may need to be notified. This will include a statement concerning the find, management measures implemented and notification of any further works arising.
- Should any non-Aboriginal heritage items be identified, this will trigger a review of the unexpected finds protocol.

### 6.1.12 Strategy 12: Register any newly identified Aboriginal objects or sites in the AHIMS database

AHIMS site cards will be prepared for each new site identified and submitted to AHIMS in accordance with the Code. This will be undertaken by Biosis.

### 6.1.13 Strategy 13: Procedure to follow for conducting further archaeological and heritage assessments in any disturbance areas where assessment has not been carried out

Any future works that are located outside of the approved SSD boundary would require further assessment and a modification to the SSD approval.

For any new works in previously undisturbed areas outside those investigated in *Eurobodalla Regional Hospital Soil Conservation Works. Aboriginal Cultural Heritage Assessment Report* (Comber Consultants 2022), *Eurobodalla Health Service Redevelopment. Historical Archaeological Assessment* (Comber Consultants 2021), *Eurobodalla Regional Hospital. Statement of Heritage Impact* (Comber Consultants 2023a), *Eurobodalla Regional Hospital (SSD-56989722): Salvage Report* (Biosis, in preparation) both an ACHAR and Historic Heritage Assessment (HHA) (inclusive of archaeology) must be undertaken.

An ACHAR must be prepared in accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011). This includes an Archaeological Report prepared in accordance with the Code and consultation with Aboriginal community in accordance with the consultation requirements.

A HHA must be prepared in accordance with current heritage guidelines including *Assessing Heritage Significance, Assessing Significance for Historical Archaeological Sites and 'Relics'* (NSW Heritage Branch, Department of Planning 2009) and the Burra Charter (Australia ICOMOS 2013b). A HHA provides an assessment to identify if any heritage items or relics exist within or in the vicinity of the study area. The heritage significance of these heritage items has been investigated and assessed to determine the most appropriate management strategy.

#### **6.1.14 Strategy 14: Heritage Induction for all employees, contractors and sub-contractors**

All employees, contractors and sub-contractors must undertake a heritage induction as part of a site induction prior to commencement of any duties within the study area. Further details of a heritage induction package have been provided in Section 8 and Appendix 1 and Appendix 2 of this ACHMP.

#### **6.1.15 Strategy 15: Procedures and requirements for ongoing review and revision of the plan, as required**

A program to monitor and report on the effectiveness of the measures and any heritage impacts will consist of reassessing the above listed strategies following the completion of works. A review and potential revision of the ACHMP may be triggered consistent with the procedures outlined in Section 6.1.9 (Strategy 9), Section 6.1.10 (Strategy 10), and Section 6.1.11 (Strategy 11). This strategy is also detailed in Section 9.2.

Upon completion of the works, a short report will be prepared, documenting:

- The effectiveness of the ACHMP measures.

A copy of the report will be provided to RAPs for the project and Heritage NSW by email to [heritagemailbox@environment.nsw.gov.au](mailto:heritagemailbox@environment.nsw.gov.au).

#### **6.1.16 Strategy 16: Contingency plan for impact to Aboriginal heritage sites outside of the development area**

In the event that Aboriginal heritage items outside of the approved disturbance area are damaged, RP Infrastructure must notify Heritage NSW immediately. Heritage NSW should be contacted through Environmental Line on 131 555 as soon practical. An appropriate no-go zone should be established until the area can be inspected and advice sought from the Heritage NSW on how to proceed.

#### **6.1.17 Strategy 17: Protection of Aboriginal heritage sites outside of the development disturbance area**

Where appropriate, the boundaries of Aboriginal heritage sites that are located outside of, but in close proximity to, the project disturbance area will be clearly marked with star pickets/pegs and high visibility flagging tape to ensure that no impacts can occur to these sites. There are several AHIMS site located outside of the study area boundary that are in close proximity to the study area. These sites include AHIMS 58-4-1321/BF-SU12 and AHIMS 58-4-1316/BF-SU4 (Figure 4). These sites should have protective fencing installed prior to ground disturbance works nearby. No works are to occur within a 5 metre radius of each AHIMS site.

In addition, all employees, contractors and sub-contractors shall:

- Be made aware of the locations of these sites during site induction.
- Seek permission to travel across areas outside of the disturbance areas from the Site Manager.
- Be provided within access to maps, with a description of the site and site coordinates available to all employees, contractors and sub-contractors as needed.

Where sites cannot be identified or located, advice shall be sought from the project heritage consultant.

## 7 Compliance management

### 7.1 Roles and responsibilities

The Eurobodalla Regional Hospital Project Manager is responsible for ensuring all activities in this manual are carried out during operation of the Eurobodalla Regional Hospital project, along with reporting any incidents to Heritage NSW.

Construction site personnel and contractors must comply with the activities outlined in this manual and any deviation to activities outlined in this manual must be reported to the Eurobodalla Regional Hospital Project Manager. Roles and responsibilities are outlined in Table 6.

**Table 6 Roles and responsibilities and contact details**

Name	Role / responsibility	Contact details
<b>Eurobodalla Regional Hospital</b>	Dan Humphries, RP Infrastructure, Project Director	0432 416 779 dan.humphries@rpinfrastructure.com.au
<b>Heritage NSW</b>	Regulator/Compliance	(02) 9873 8500 heritagemailbox@environment.nsw.gov.au
<b>Biosis</b>	Anthea Vella, Team Leader – Heritage (NSW)	0427 463 834 avella@biosis.com.au

### 7.2 Record keeping

Records of the identified heritage items on AHIMS standard documentation records must be kept by the archaeologist, site personnel, contractors, and Eurobodalla Regional Hospital Project Manager:

### 7.3 Incidents

If an incident occurs that results in actual or potential impacts on known heritage items and/or archaeological items that are discovered unexpectedly, Heritage NSW will be informed immediately.

Notification to the Environmental Line on 131 555 must be undertaken where the incident relates to potential harm to an Aboriginal object not covered by an existing project approval.

The report to Heritage NSW should also be sent to the Eurobodalla Regional Hospital Project Manager and the archaeologist and include:

- Any contravention to the strategies outlined in the ACHMP.
- The nature of the incident.
- The actual or likely impact of the incident on Aboriginal objects and/or Aboriginal places.
- The nature and location of the Aboriginal objects and/or places, referring to and providing maps and photos where appropriate.
- The measures which have been taken or will be taken to prevent a recurrence of the incident.



## 8 Training and awareness

---

All site personnel must comply with all Eurobodalla Regional Hospital Work Health and Safety (WHS) manuals and procedures. As part of the operation of the Eurobodalla Regional Hospital project, site personnel must undertake a cultural heritage induction which will include:

- A description of Aboriginal cultural heritage in Australia.
- A description of Aboriginal cultural heritage in the Moruya area.
- A description of the tangible and intangible aspects of Aboriginal heritage and why it is important.
- An overview of the NPW Act and the Heritage Act and the implications and fines applicable for breaching the Acts.
- The process for reporting unknown cultural heritage sites.
- The process for reporting damage to cultural heritage sites.
- The process for reporting human remains.

In addition to the above, Biosis will provide an overview of each recorded Aboriginal heritage site which has been identified on the Eurobodalla Regional Hospital. This will include:

- The site boundaries and how they have been marked.
- The content of the site.
- Whether any salvage works have taken place.

## 9 Review and improvement

---

### 9.1 Continuous improvement

Opportunities for the improvement of this ACHMP will be found through the ongoing evaluation of environmental management performance against environmental policies, objectives and targets. The purpose of this is to:

- Identify opportunities for the improvement of environmental management and performance.
- Determine the cause or causes of non-conformances and deficiencies.
- Development and implementation of a plan of corrective and preventative actions to address any non-conformances and deficiencies in this ACHMP.
- Corroborate the efficiency of the corrective and preventative actions.
- Document any changes in procedures resulting from process improvement.
- Revise the objectives and targets of this ACHMP accordingly.

### 9.2 ACHMP update and amendment

Updates and amendments will occur as needed. A copy of the updated ACHMP and changes will be distributed to all relevant stakeholders in accordance with the approved document control procedure. The ACHMP will also be updated and resubmitted for approval in the event a previously unidentified heritage items are found.

Revisions to this ACHMP, if required, must be undertaken by a suitably qualified heritage consultant in consultation with Eurobodalla Regional Hospital and Heritage NSW. With the exception of the minor changes defined below, the amended ACHMP must be forwarded to RAPs for review and comment if required.

A review and amendment to this ACHMP must be conducted by a suitably qualified heritage consultant in the following instances:

- If recommended by an independent audit.
- Within one month of changes to the CoC, license conditions or relevant legislation relating to Aboriginal heritage.
- Within one month of any reportable Aboriginal heritage-related incidents within the project's construction footprint.
- Within one month of the discovery of a previously unidentified heritage item.

Revised versions of the ACHMP will be made available and distributed to RAPs through the processes described in Section 6.1.1. Changes will also be communicated through toolbox talks to existing onsite personnel and incorporated into environmental induction materials.

#### 9.2.1 Minor permissible amendments

Minor permissible changes to the ACHMP which do not require comments from RAPs are as follows:

- Changes that are administrative in nature (e.g. staff and agency/authority name changes).

- Changes in response to audit findings or periodic reviews.
- Do not compromise the ability of the project to meet legislative requirements and are consistent with terms of the approval, and does not include any modifications to the terms of project approval.

## References

---

Allen, J & O'Connell, J 2003, 'The long and the short of it: archaeological approaches to determining when humans first colonised Australia and New Guinea', *Australian Archaeology*, vol. 57, pp. 5–19.

Australia ICOMOS 2013a, *The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance*, Australia ICOMOS, Burwood, VIC.

Australia ICOMOS 2013b, 'The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance', <<https://australia.icomos.org/publications/charters/>>.

Bowler, JM et al. 2003, 'New ages for human occupation and climatic change at Lake Mungo, Australia', *Nature*, vol. 421, no. 6925, pp. 837–840.

Comber Consultants 2021, *Eurobodalla Health Service Redevelopment. Historical Archaeological Assessment. Prepared for Health Infrastructure NSW*.

Comber Consultants 2022, *Eurobodalla Regional Hospital Soil Conservation Works. Aboriginal Cultural Heritage Assessment Report. Prepared for Health Infrastructure NSW*.

Comber Consultants 2023a, *Eurobodalla Regional Hospital. Statement of Heritage Impact. Prepared for Health Infrastructure NSW*.

Comber Consultants 2023b, *Soil Conservation, Research Design, March 2023, Version: 1. 2022.*, Report prepared for Health Infrastructure. Comber Consultants.

DECCW 2010a, *Aboriginal Cultural Heritage Consultation Requirements for Proponents*, New South Wales Government Department of Environment and Climate Change., Sydney, NSW.

DECCW 2010b, 'Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW', <Department of Environment, Climate Change and Water NSW, Sydney, NSW.  
<https://www.environment.nsw.gov.au/research-and-publications/publications-search/code-of-practice-for-archaeological-investigation-of-aboriginal-objects-in-nsw>>.

Dibden, J 2005, *Braemar Farm Proposed Residential Subdivision, Moruya NSW Subsurface Test Excavation s87 Permit #2249*.

NSW Heritage Branch, Department of Planning 2009, 'Assessing Significance for Historical Archaeological Sites and "Relics"',  
<<https://www.environment.nsw.gov.au/resources/heritagebranch/heritage/ArchSignificance.pdf>>.

OEH 2011, 'Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW', <Office of Environment and Heritage, Department of Premier and Cabinet, Sydney NSW>.



# Appendices

---

## Appendix 1 Identifying Aboriginal objects and site types



### Isolated stone artefact

Stone artefacts are any items of stone material made or modified by people, including any debris left behind when such tools were made. Materials used to make stone artefacts may be found locally, or traded across long distances.



### Stone artefact scatter

Stone artefact scatter sites comprise groups of stone tools, debris and the tools used in manufacture (i.e. stone anvils and hammerstones). Artefact scatters can range from high-density concentrations of flaked stone and ground stone artefacts to sparse, low-density 'background' scatters and isolated finds.



### Shell midden

Shell middens are the remains of food production and processing areas, where people would have sat down to eat, cook or prepare food. Shell middens occur commonly in coastal areas, however they also occur near inland watercourses where freshwater mussels and other edible mollusc species may be present.



### Modified tree

A modified tree is any tree from which the bark has been cut or harvested for the manufacture of containers (coolamon), canoes, shields, weapons and medicines. Scarring also occurred where toeholds were cut to allow people to climb trees to hunt possums, reptiles, birds or harvest wild honey.



### Burial

Burials comprise any traditional Aboriginal human skeletal remains, intact or fragmentary. If any suspected human remains are encountered, the procedure set out in this document must be followed.



### Aboriginal gathering and resource location

Resource gathering locations are places where food, medicines and plant material used as twine, in weaving or tool making by Aboriginal people exist. Many such locations are still accessed by contemporary Aboriginal people.





## Hearth

A hearth is the remains of a campfire, an oven or other food cooking and processing areas. Hearths commonly contain baked clay, termite mound fragments broken up and used as 'heat retainers', small stones used in cooking, charcoal, burnt bone, shell and other food remnants.



## Appendix 2 Identifying non-Aboriginal heritage items

If any historical relics are identified then the unexpected finds process must be followed. As stated above, non-Aboriginal heritage items may include archaeological 'relics' or other historical items (i.e. works, structures, buildings or movable objects).

Historical heritage items/objects can consist of the following materials:

- Ceramic
- Glass
- Organic material
- Leather
- Metal
- Synthetic
- Historical relics can consist of single items, dense archaeological deposits, built structures and landscapes. Examples of heritage items are shown in photographs below.



**Ceramic plate fragments**



**Glass artefacts**



**Ceramic artefacts**



**Cesspit filled with ash**



**A drainage system**





**Wall footings**



**Dense artefact deposits**





**Historic well**

# Appendix 3    Resume of report authors

---

## Curriculum vitae

# Samantha Keats

## Manager - Heritage (NSW)

### Qualifications

- Bachelor of Arts (Honours)

### Other qualifications and training

- General Induction for Construction Work in NSW, Work Cover
- Provide first aid, St. John's Ambulance Australia
- Lithics Masterclass, University of Sydney
- Zooarchaeology unit, University of New England



## Professional experience

Samantha is an archaeologist with Biosis Wollongong office and has over eight years of experience as an archaeologist. Samantha has had experience working as an archaeologist and project manager on a number of Aboriginal and European heritage projects across New South Wales, including water infrastructure and linear projects, residential development projects, renewable energy projects, and telecommunications projects. As part of these project Samantha has interacted with a diverse client base including Local Government, National Parks and Wildlife Service, Department of Primary Industry and Water, resource companies, architectural firms, engineering firms, and private developers.

Samantha has experience in undertaking remote Aboriginal archaeological surveys and large-scale archaeological testing excavation programs and has served as a key team member and project manager on a number of projects in the Illawarra, the South Coast, Canberra, and Far Western NSW. These projects have seen her take part in Aboriginal community consultation, background research, archaeological excavation and survey, and has authored numerous Aboriginal heritage assessments and Statement of Heritage Impact reports. Samantha is also accomplished in obtaining approvals under the *NSW National Parks and Wildlife Act 1974*.

Samantha has a particular focus on rock art assemblages and ochre in the north-west Kimberley region of Australia and is currently undertaking a PhD in this region.

## Key project experience

### Project Manager/Archaeologist

*Picton Road Upgrade: Aboriginal cultural heritage and archaeological services. For Transport for NSW.*

Biosis was engaged by TfNSW to undertake an ACHAR as part of Stage 3 PACHCI for the proposed Picton Road upgrade. This included extensive survey, test excavations and comprehensive Aboriginal community consultation that included a cultural heritage sensitivity mapping component. Multiple workshops, on Country visits and one-on-one oral history interviews were undertaken to understand the cultural values of the project. This resulted in a comprehensive Aboriginal Cultural Values and Sensitivity Report, which ultimately informed the design phase of the project. This report was also the basis for an ArcGIS StoryMap for the western section of the alignment. The result was a collaborative experience for Biosis, TfNSW and the Aboriginal community.

### Project Manager/Archaeologist

*Princes Highway Upgrade Program: Milton Ulladulla Bypass archaeological services. For Transport for NSW.*

Biosis was commissioned by Transport for NSW to provide Aboriginal archaeological and cultural heritage services for the Milton Ulladulla Bypass. The ACHAR included archaeological survey and test excavations to identify any potential impacts to Aboriginal cultural heritage as a result of the proposed works and to inform the road design process. This project also required a detailed cultural assessment chapter to identify significant cultural values within the alignment. The result was a holistic ACHA that supplied specific management and mitigation measures to protect tangible and intangible Aboriginal cultural values within and in the vicinity of the bypass.

### Project Manager/Archaeologist

*Stuart Park, North Wollongong: Aboriginal cultural heritage assessment. For Wollongong City Council.*

Biosis was commissioned by Wollongong City Council to undertake an ACHA for the AAAA Playground at Stuart Park, North Wollongong. The investigations included archaeological test excavations and comprehensive Aboriginal community consultation. The results identified an intact, highly significant archaeological deposit. Biosis worked intensely with Wollongong City Council and Heritage NSW to develop a methodology and protocols to avoid the most significant parts of the site while allowing the works to proceed under an Aboriginal Heritage Impact Permit without the required for archaeological salvage excavations.

### Project Manager/Archaeologist

*Toorale National Park Environmental Water Delivery Scheme Aboriginal cultural heritage assessment. For Department Planning, Industry and Environment.*

Biosis was engaged by Department Planning, Industry and Environment (DPIE) to undertake an ACHA for the Toorale National Park Environmental Water Delivery Scheme. The investigations included an Aboriginal cultural heritage assessment, archaeological test excavations, Aboriginal Heritage Impact Permit and cultural heritage management plan. This long running project saw collaboration between Biosis, DPIE and Kurnu-Baakandji Joint Management Advisory Committee to ensure that the important landscape and Aboriginal cultural values of Toorale are maintained or enhanced, while achieving greater flexibility to pass more water to the Darling River.

### Project Manager/Archaeologist

*Gerroa San Quarry Modification. For Cleary Bros (Bombo) Pty Ltd.*

Biosis was commissioned by Clearly Bros to undertake an Aboriginal Cultural Heritage Assessment for a modification to an existing sand quarry. The site possesses tangible and intangible cultural heritage values and was subjected to test excavations under an AHIP. Aboriginal stakeholder consultation was undertaken with Jerrinja LALC for ongoing management of Aboriginal sites located within proposed modification. Close consultation with Jerrinja LALC identified one area as having a high cultural significance, which was subsequently conserved and protected. Salvage excavations were recommended in other areas for possible relocation. Representatives of Jerrinja LALC have participated in all aspects of the assessment.

### Project Manager/Archaeologist

*Nimmie-Caira Interim Land Management Aboriginal Cultural Heritage Assessment. For Department of Planning, Infrastructure and Environment.*

Biosis was commissioned to undertake an ACHA for the Interim Land Management works at the Nimmie Caira Property. The proposed works involved interim land management activities including pest and weed control, security, fire prevention works and water infrastructure operations. The project required surveys of in excess of 400km of infrastructure, Aboriginal consultation and reporting. Biosis was also commissioned to develop minimum requirements to protect, maintain and enhance environmental and Aboriginal cultural heritage values for the Nimmie Caira Property. The minimum requirements formed the basis of an enduring land and water management plan and contributed to the process of identifying and appointing a land manager to the site.

## Key publications

Moore, M.W., K. Westaway, J. Ross, K. Newman, Y. Perston, J. Huntley, **S. Keats**, Kandiwal Aboriginal Corporation and M.J. Morwood 2020 Archaeology and art in context: Excavations at the Gunu Site Complex, Northwest Kimberley, Western Australia. *PLoS ONE* 15(2): e0226628.  
<https://doi.org/10.1371/journal.pone.0226628>

## Professional affiliations and memberships

Australian Archaeological Association (AAA)  
International Council for Archaeozoology (ICAZ)  
Australia ICOMOS (International Council on Monuments and Sites)



## Curriculum vitae

# Anthea Vella

## Team Leader – Heritage NSW

### Qualifications

- Bachelor of Archaeology from Flinders University
- Master of Archaeology and Heritage Management from Flinders University

### Other qualifications and training

- Provide First Aid (HLTAID011)
- Current NSW driver's licence
- General Construction Induction (white card)
- 4WD Certificate
- Rail Industry Worker Card
- Working With Children Check



## Professional experience

Anthea has over six years of experience in the consulting industry, as well as extensive volunteering experience on archaeological research projects in Australia. Anthea has also managed and completed a range of Aboriginal cultural heritage and historical heritage projects across NSW. She also has geophysical skills in Ground Penetrating Radar data collection, processing and interpretation.

Anthea has managed a range of different projects for a diverse client base including architectural firms, engineering firms, private developers and Government departments. These include projects which require Aboriginal Due Diligence Assessments, Aboriginal Cultural Heritage Assessments, Historical Heritage Assessments, Statements of Heritage Impact, Constraints Assessments, Aboriginal and Non-Aboriginal Heritage Management Plans, and Heritage Impact Assessments and permits for Aboriginal archaeology. She has experience working on major State significance projects as well as locally significant sites.

Anthea's key areas of expertise include project management, background research, Aboriginal community consultation, field survey, test excavations, salvage excavations, management plans, artefact analysis, archival recording, archaeological report writing, and providing heritage advice in the Sydney, Central Coast and Hunter, Illawarra regions, and regional NSW. Anthea is also accomplished in obtaining approvals under the *NSW National Parks and Wildlife Act 1974*.

## Key project experience

### **Project Manager/Senior Heritage Consultant**

*Eurobodalla Regional Hospital Archaeological Salvage and Aboriginal Community Engagement. For RP Infrastructure on behalf of Health Infrastructure.*

This project involved Aboriginal community consultation, extensive salvage excavations, project management, client liaison, and other reporting. The salvage excavations were undertaken within two weeks of the Aboriginal Heritage Impact Permit being issued, showing flexibility within the team. Relationships with the Moruya Aboriginal Community have been strengthened through the salvage excavations, community consultation and by the overall project.

### **Project Manager/Senior Heritage Consultant**

*Royal Prince Alfred Hospital heritage services. For TSA Management and CPB Contractors on behalf of Health Infrastructure.*

This project involved approval pathways under Part 4 and Part of the *Environmental Planning and Assessment Act 1979* that required separate assessments including Aboriginal Due Diligence Assessments, Aboriginal Cultural Heritage Assessment, Historical Archaeological Impact Assessment, and an unexpected finds assessment. Biosis kept the client informed of timeframes.

### **Project Manager/Archaeologist**

*Aboriginal Cultural Heritage Assessment and Historical Impact Statement -1030-1048 and 1050-1064 Mamre Road, Kemps Creek. For ESR Australia Pty Ltd.*

This project involved Aboriginal community consultation, preparation of an Aboriginal Cultural Heritage Assessment and Archaeological Report, Aboriginal test excavations, and a Heritage Impact Statement for a State Significant Development. Client communication was particularly important in this project and the project was completed on time and within budget.

### **Project Manager/Archaeologist**

*Aboriginal Cultural Heritage Assessment and Historical Archaeological Impact Statement – Calala BESS. For Equis.*

This project involved Aboriginal community consultation, preparation of the Aboriginal Cultural Heritage Assessment and Archaeological Report, and a Historical Archaeological Impact Statement for a State Significant Development. Client communication was a core focus, and the project was completed on time and within budget.

### **Project Manager/Archaeologist**

*St Pauls Church, Nangus Historical Heritage Assessment and Ground Penetrating Radar Assessment. For the Anglican Parish of Gundagai.*

This project involved a Historical Heritage Assessment and a Ground Penetrating Radar Assessment (completed by a sub-consultant) for St Pauls Church. Client communication was a core focus, and the project was completed on time and within budget.

### **Project Manager/Archaeologist**

*Pacific Highway Upgrades, Wahroonga Non-Aboriginal Heritage Services. For Ward Civil on behalf of Transport for NSW.*

This project included unexpected finds, a Non-Aboriginal Cultural Heritage Management Plan, Heritage Induction, and Archival Recording. There were several locally listed and State heritage listed heritage items that needed to be managed for the project. The project had tight timeframes which Biosis were able to achieve.

## Key publications

Moffat, I., J. Linsell, **A. Vella**, B. Duke, J. Kowlessar, J.G. Griffith, and A. Down 2020. Mapping unmarked graves with Ground Penetrating Radar at the Walkerville Wesleyan Cemetery, Adelaide. *Australian Archaeology* 86(1):57-62.

Moffat, I., J. Garnaut, C. Jordan, **A. Vella**, M. Bailey, and Gunditj Mirring Traditional Owners Corporation 2016. Ground penetrating radar investigations at the Lake Condah Mission Cemetery: Locating unmarked graves in areas with extensive subsurface disturbance. *The Artefact* 39:8-14.

## Professional affiliations and memberships

Australian Archaeological Association (AAA)

Australasian Society for Historical Archaeology (ASHA)

Australia ICOMOS (International Council on Monuments and Sites)

Full member - Australian Association of Consulting Archaeologists Inc. (AACAI)

## Curriculum vitae

# Ashley Bridge

## Senior Heritage Consultant

### Qualifications

- Master of Archaeological Science (Adv) (Honours)
- Bachelor of Arts Archaeology (major) and Ancient History (minor)

### Other qualifications and training

- Provide First Aid (HLTAID011)
- General Construction Induction (white card)
- Working with Children Check



## Professional experience

Ashley joined Biosis at the Sydney Office as a Research Assistant – Heritage in 2018 and now has over 5 years' experience in the heritage consulting industry. She completed her Masters in Archaeological Science in 2016, having written a thesis on forensic stature in Australian mass casualty scenarios, developing equations that allow anthropologists to discern stature in a female Australian population.

Ashley has undertaken field work in Australia and Europe over the past seven years, spending 2017 in Transylvania, Romania, Menorca, and Spain, as a volunteer. Since 2018, Ashley has undertaken fieldwork for Biosis throughout Sydney, Newcastle, Wollongong and Western New South Wales, with a focus in both Aboriginal and historical archaeology. She has skills in bioarchaeological and zooarchaeological identification, project and client management Aboriginal and historical excavations. She also is skilled in project management, reporting, historical research, and Aboriginal consultation practices in an Australian context.

During her time as a heritage consultant, Ashley has successfully obtained project approvals for both Aboriginal and historical heritage under the *NSW National Parks and Wildlife Act 1974* and *Heritage Act 1977*, including Aboriginal Heritage Impact Permits, State Significant Development approvals and Section 60 approvals. As part of these approvals, Ashley has authored a range of report types including due diligence assessments, statement of heritage impact assessments, Aboriginal cultural heritage assessments, heritage management plans and letters of advice, which have supported review of environmental factors, Environmental Impact Statements, and development applications.



## Key project experience

### Senior heritage consultant/ project manager

*Cambewarra—Aboriginal salvage works*

Aboriginal salvage works in Cambewarra, NSW: Ashley is the current project manager for a large-scale project in Cambewarra. As a condition of the Aboriginal Heritage Impact Permit, salvage works are currently being conducted in the area. Ashley is leading a team of heritage consultants and Aboriginal stakeholders with the completion of these excavation works. In addition to liaising with the client, construction team and Heritage NSW, she has also undertaken excavations, data collection and artefact analysis.

### Heritage consultant/ project manager

*Bunnygalore Clay/Shale Mine—Aboriginal Cultural Heritage Assessment*

Ashley is the current project manager for a project adjacent to Belanglo State Forest as part of pre-approvals for mining extension works for RW Corkery. Ashley has undertaken Aboriginal community consultation and provided advice to the client regarding their legislative and statutory obligations to both Aboriginal and historical works.

### Heritage consultant/ project manager

*Calderwood Golf Course—Aboriginal Cultural Heritage Assessment*

As part of this project an Aboriginal assessment was undertaken. This assessment established one area of high archaeological sensitivity. Positive and early engagement with the client resulted in the successful redesign of the proposed works, allowing this area to be retained as an environmental protection zone. Ashley liaised with the Aboriginal community and the client to ensure positive outcomes, while completing an archaeological survey and reporting.

### Senior heritage consultant/ project manager

*Worcester Road, Rouse Hill—Aboriginal Cultural Heritage Assessment*

As part of this project an Aboriginal assessment was undertaken, which involved the completion of test excavations. Due to the discovery of high-density artefactual deposits, salvage excavations were undertaken prior to works proceeding. Ashley was in charge of a large team conducting two excavation programs. She has liaised with the Aboriginal community, Heritage NSW and the client over the last 4 years while also conducting detailed lithic analysis and reporting.

### Heritage consultant

*Cleveland Road, Dapto—Aboriginal Cultural Heritage Assessment*

Aboriginal test excavations in Dapto, NSW: Ashley lead a team conducting test excavations on Cleveland Road. Ashley assisted project managers by conducting excavations, project management and data collection including recording and mapping features.

### Heritage consultant

*Woronora River Bridge—Historical Heritage Assessment and Statement of Heritage Impact*

Historical Heritage Assessment and Statement of Heritage Impact in Woronora, NSW; Ashley assisted the project manager in site inspections, reporting and client liaison for the structural and safety amendments to the Woronora River bridge. She provided succinct impact assessments for varying proposed work packages and as a portion of the project fell within Commonwealth land, had to ensure advice and proposed works were undertaken in accordance with the Environment Protection and Biodiversity Conservation Act 1999.



## Key publications

Bridge, A.L., Oxenham, M.F. and Miskiewicz, J.J. 2018. Estimating stature using human forearm and leg anthropometric data in an Australian female sample. Australian Journal of Forensic Sciences, pp.1-13.

## Professional affiliations and memberships

ICOMOS member – Member FY2023

## Curriculum vitae

# Crystal Garabedian

**Heritage Consultant**  
**Business Development Lead (NSW)**

## Qualifications

- Bachelor of Arts (Honours)—Archaeology
- Bachelor of Science—Geology and Geophysics

## Other qualifications and training

- General construction induction card
- Provide First Aid (HLTAID003)
- Provide cardiopulmonary resuscitation (HLTAID009)



# Professional experience

Crystal has been a member of the New South Wales Heritage team since September 2021. She completed her Bachelor of Science and Bachelor of Arts with Honours, with a focus on marine zooarchaeology, and hunter-gatherer economies.

Prior to her role in Biosis, Crystal worked as a research assistant at Macquarie and La Trobe Universities, where she was part of a software development project for field data collection. During this time Crystal also worked as a subcontracting archaeologist, undertaking cataloguing, photography, and detailed analyses of historic artefacts and marine invertebrate remains. Since 2020, she has also been a copyeditor for the Australasian Society for Historical Archaeology and their annual journal, *Australasian Historical Archaeology*.

Crystal has experience in Aboriginal community consultation, artefact analysis, background research, field surveys, project management, technical report writing, and test and salvage excavations throughout New South Wales. During her time with Biosis she has completed several Aboriginal Cultural Heritage Assessments, Statement of Heritage Impact reports, Heritage Interpretation Plans, Heritage Impact Statements and Heritage Management Plans, on time and within budget.

Crystal's capability stems from a thorough understanding of relevant legislation, which has aided her consulting on a range of projects, including residential developments and subdivisions, road infrastructure, industrial developments, mining projects, and renewable energy developments. She is also skilled in the provision of heritage advice and services, having provided such for Integrated Development Applications (IDAs), State Significant Infrastructure (SSI) and State Significant Development (SSD) projects, and for projects involving items of Local and State heritage significance.

## Key project experience

### **Project Manager/Heritage Consultant**

*Historical Archaeological Assessment and Aboriginal Cultural Heritage Assessment. For Morrison Design Partnership Architects.*

This SSD project involved the preparation of heritage reports in response to the Secretary's Environmental Assessment Requirements (SEARs). This included a Historical Archaeological Assessment and Aboriginal Cultural Heritage Assessment, which aided the consultation for the Connecting with Country component of the development.

### **Project manager/Heritage Consultant**

*Statement of Heritage Impact and Aboriginal Cultural Heritage Assessment—270 Aldington Road, Kemps Creek. For AT&L, Fife Capital, and Stockland.*

This project involved Aboriginal community consultation, preparation of a Statement of Heritage Impact, Aboriginal Cultural Heritage Assessment and Archaeological Report, and Aboriginal test excavations across the site. Completion of the impact assessment resulted in the need to obtain an Aboriginal Heritage Impact Permit under the *National Parks and Wildlife Act 1974* to commence works.

### **Project manager/Heritage Consultant**

*Aboriginal Due Diligence Assessment—Callan Park, Lilyfield. For Greater Sydney Parklands Trust.*

An Aboriginal Due Diligence Assessment including an archaeological survey with Aboriginal community participation was conducted within State Heritage Listed Callan Park. Heritage advice in the form of a constraints assessment informed the proposed vegetation clearance and maintenance works proposed to be undertaken.

### **Project manager/Heritage Consultant**

*Aboriginal Cultural Heritage Assessment—Picnic Island, Windang. For Endeavour Energy.*

Emergency electrical works located in proximity to an Aboriginal midden site triggered the need for an Aboriginal Cultural Heritage Assessment. This project involved extensive Aboriginal community consultation, test excavations and the successful application of an Aboriginal Heritage Impact Permit under the *National Parks and Wildlife Act 1974*

### **Project manager/Heritage Consultant**

*Aboriginal Cultural Heritage Assessment and Heritage Management Plan—34–44 Park Road, Leppington. For Enspire Solutions.*

An Aboriginal Cultural Heritage Assessment resulted in a program of test excavations that uncovered Aboriginal objects. An Aboriginal Heritage Impact Permit under the *National Parks and Wildlife Act 1974* was required and granted. Following an Integrated Development Application lodged by the client, the General Terms of Approval required a Heritage Management Plan, which was prepared and accepted by Liverpool City Council.

### **Project manager/Heritage Consultant**

*Aboriginal Cultural Heritage Assessment—Towradgi Point, Towradgi. For Wollongong City Council.*

An unexpected find of an Aboriginal Midden at Towradgi Point, Towradgi initiated an Aboriginal Cultural Heritage Assessment, and the need for an Aboriginal Heritage Impact Permit under the *National Parks and Wildlife Act 1974* to complete the works. This project also included monitoring and extensive Aboriginal community consultation.

## Professional affiliations and memberships

Australian Association of Consulting Archaeologists Inc. (AACAI)

Australasian Society for Historical Archaeology (ASHA)

The International Council on Monuments and Sites (ICOMOS)



## Appendix 4 Aboriginal consultation

This appendix includes the consultation undertaken:

- Long-term care and control of all Aboriginal objects salvaged under AHIP 5060.
- AHIP 5060 mailout.
- Project update.
- Draft ACHMP reviews – first and second drafts.

A copy of the associated correspondence has been included in Appendix 4.

### First draft ACHMP review

No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
1	Cobowra LALC	09/05/2024, email and 30/05/2024, reminder email	-	-
2	South Coast People c/o NTS Corp	09/05/2024, email and 30/05/2024, reminder email	-	-
3	Thoorga Thoorga	09/05/2024, email and 30/05/2024, reminder email	-	-
4	Didge Ngunawal Clan	09/05/2024, email and 30/05/2024, reminder email	30/05/2024, email	Please keep us updated
5	Barraby Cultural Services	09/05/2024, email and 30/05/2024, reminder email	-	-
6	South Coast Elders Group	09/05/2024, mail and 30/05/2024, reminder mail	-	-
7	Goobah CHS	09/05/2024, email and 30/05/2024, reminder email	-	-
8	Eurobodalla Regional Hospital Connecting with Country Project Working Group (ERH CwC PWG)	09/05/2024, email and 30/05/2024, reminder email	-	-
9	Confidential Party No.1	09/05/2024, email and 30/05/2024, reminder email	-	-
10	Confidential Party No. 2	09/05/2024, email and 30/05/2024, reminder email	-	-
11	Confidential Party No. 3	09/05/2024, email and 30/05/2024, reminder email	-	-
12	Badu	09/05/2024, email and 30/05/2024, reminder email	-	-
13	Bidawal	09/05/2024, email and 30/05/2024, reminder email	-	-

No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
14	Bilinga	09/05/2024, email and 30/05/2024, reminder email	-	-
15	Birrungal	09/05/2024, email and 30/05/2024, reminder email	-	-
16	Bullawaya	09/05/2024, email and 30/05/2024, reminder email	-	-
17	Bulling Gang	09/05/2024, email and 30/05/2024, reminder email	-	-
18	Curwur Murre	09/05/2024, email and 30/05/2024, reminder email	-	-
19	Dharug	09/05/2024, email and 30/05/2024, reminder email	-	-
20	Djanaba Gaxabara	09/05/2024, email and 30/05/2024, reminder email	-	-
21	Elouera	09/05/2024, email and 30/05/2024, reminder email	-	-
22	Eora	09/05/2024, email and 30/05/2024, reminder email	-	-
23	Gadung	09/05/2024, email and 30/05/2024, reminder email	-	-
24	Gangangarra	09/05/2024, email and 30/05/2024, reminder email	-	-
25	Garranga Bumarri	09/05/2024, email and 30/05/2024, reminder email	-	-
26	Golangaya	09/05/2024, email and 30/05/2024, reminder email	-	-
27	Gulla Gunar	09/05/2024, email and 30/05/2024, reminder email	-	-
28	Gunyyu	09/05/2024, email and 30/05/2024, reminder email	-	-
29	Kuringgai	09/05/2024, email and 30/05/2024, reminder email	-	-
30	Munyunga	09/05/2024, email and 30/05/2024, reminder email	-	-
31	Murrin	09/05/2024, email and 30/05/2024, reminder email	-	-
32	Murrumbul	09/05/2024, email and 30/05/2024, reminder email	-	-
33	Ngario	09/05/2024, email and 30/05/2024, reminder email	-	-
34	Ngunawal	09/05/2024, email and 30/05/2024, reminder email	-	-

No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
35	Nundagurri	09/05/2024, email and 30/05/2024, reminder email	-	-
36	Tharawal	09/05/2024, email and 30/05/2024, reminder email	-	-
37	Thauaira	09/05/2024, email and 30/05/2024, reminder email	-	-
38	Walbunja Elders	09/05/2024, email and 30/05/2024, reminder email	-	-
39	Hika Tekowhai	09/05/2024, email and 30/05/2024, reminder email	-	-
40	Wandandian	09/05/2024, email and 30/05/2024, reminder email	-	-
41	Wingikara	09/05/2024, email and 30/05/2024, reminder email	-	-
42	Woka Aboriginal Corporation	09/05/2024, email and 30/05/2024, reminder email	-	-
43	Ngario Elders	**error in consultation log – first draft ACHMP had not been sent	-	-

## Second draft ACHMP review

No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
1	Cobowra LALC	09/07/2024, email	01/08/2024, phone	Discussed the updated ACHMP and the methodology for tree removal. Agreed to the proposed methodology.
2	South Coast People c/o NTS Corp	09/07/2024, email	-	-
3	Thoorga Thoorga	09/07/2024, email	-	-
4	Didge Ngunawal Clan	09/07/2024, email	-	-
5	Barraby Cultural Services	09/07/2024, email	-	-
6	South Coast Elders Group	09/07/2024, phone and mail	09/07/2024, phone	Advised of updates over the phone and confirmation that a hard copy would be sent out.
7	Goobah CHS	09/07/2024, 10/07/2024 and 11/07/2024 email (email had bounced back)	-	-
8	ERH CwC PWG	09/07/2024, email	-	-
9	Confidential Party No.1	09/07/2024, email	-	-

No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
10	Confidential Party No. 2	09/07/2024, email	-	-
11	Confidential Party No. 3	09/07/2024, email	-	-
12	Badu	09/07/2024, email	-	-
13	Bidawal	09/07/2024, email	-	-
14	Bilinga	09/07/2024, email	-	-
15	Birrungal	09/07/2024, email		
16	Bullawaya	09/07/2024, email	-	-
17	Bulling Gang	09/07/2024, email	-	-
18	Curwur Murre	09/07/2024, email	-	-
19	Dharug	09/07/2024, email	-	-
20	Djanaba Gaxabara	09/07/2024, email	-	-
21	Elouera	09/07/2024, email	-	-
22	Eora	09/07/2024, email	-	-
23	Gadung	09/07/2024, email	-	-
24	Gangangarra	09/07/2024, email	-	-
25	Garranga Bumarri	09/07/2024, email	-	-
26	Golangaya	09/07/2024, email	-	-
27	Gulla Gunar	09/07/2024, email	-	-
28	Gunyuu	09/07/2024, email	-	-
29	Kuringgai	09/07/2024, email	-	-
30	Munyunga	09/07/2024, email	-	-
31	Murrin	09/07/2024, email	-	-
32	Murrumbul	09/07/2024, email	-	-
33	Ngario	09/07/2024, email	-	-
34	Ngunawal	09/07/2024, email	-	-
35	Nundagurri	09/07/2024, email	-	-
36	Tharawal	09/07/2024, email	-	-
37	Thauaira	09/07/2024, email	-	-
38	Walbunja Elders	09/07/2024, email	-	-
39	Hika Tekowhai	09/07/2024, email	-	-
40	Wandandian	09/07/2024, email	-	-
41	Wingikara	09/07/2024, email	-	-
42	Woka Aboriginal Corporation	09/07/2024, email	-	-
43	Ngario Elders	9/07/2024 and 10/07/2024, phone and email	10/07/2024, email	Provided email address for ACHMP to be sent to.



6 December 2023

Health Infrastructure  
c/o Jack Duncalf  
Project Manager  
RP Infrastructure  
Level 19/9 Hunter Street  
Sydney NSW 2000

Dear Jack,

## **Eurobodalla Regional Hospital Project: Consultation meeting outcomes and recommendations**

**Our Ref: Matter: 37940**

Biosis Pty Ltd (Biosis) has prepared this report for Health Infrastructure to detail the outcomes of the consultation undertaken with the local Aboriginal community to support the long-term care and control of artefacts identified as part of the salvage excavations at the site of the Eurobodalla Regional Hospital, Moruya, New South Wales (NSW). This report details the extensive consultation activities, summarises the feedback from the community and provides recommendations to support the care and control of artefacts. This consultation has included the Registered Aboriginal Parties (RAPs) as part of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010) and the Aboriginal Heritage Impact Permit (AHIP) 5060; the Connecting with Country Project Working Group; and additional members of the wider Aboriginal community.

### **Initial on-site meeting—20 July 2023**

An initial on-site meeting was held on Thursday 20 July 2023 to discuss the long-term care and control of artefacts identified as part of the salvage excavations. At the on-site meeting, it was agreed that the majority consensus from the consultation will form the long-term care and control recommendation put forward for the project. The invitation to the initial on-site meeting was sent out to the RAPs.

The outcomes of the meeting included:

- Identification of a reburial location.
- Reburial was the preferred method for the long-term care and control of artefacts.
- Display/interpretation should also be included within the Hospital.
- Additional consultation should be undertaken with the wider Aboriginal community.

## Consultation undertaken prior to the second on-site meeting

Following on from the initial on-site meeting, additional consultation was undertaken with the wider Aboriginal community. Consultation with the wider Aboriginal community was undertaken by Gerard Dennis, Manager - Aboriginal Community Engagement, of Southern NSW Local Health District (LHD). This consultation was undertaken with the members of the Connecting with Country Project Working Group and members of the wider Aboriginal community. Separate consultation with the RAPs has been undertaken by Biosis and is detailed in later sections of this report. The consultation undertaken prior to the on-site meeting was done to provide an indication of long-term care and control preferences prior to the on-site meeting. Table 1 provides the result of these preferences, with 'display of artefacts (interpretation)' with the highest result. Display of artefacts also included the potential reinterpretation of the artefacts in an artistic display (i.e. artworks).

**Table 1 Results of the consultation undertaken prior to the second on-site meeting**

Long term care and control option	Tally
Display of artefacts	12
Reburial of all artefacts, with an interpretative display	5
No comment	5
Reburial of all artefacts (no display or interpretation)	4
Undecided	1

## Comments provided prior to the second on-site meeting

As part of the consultation undertaken prior to the second on site meeting, specific comments were provided. Some of the key themes are included below:

- Display the “good” artefacts and rebury the rest.
- The display should be artistic and should be able to be used for educational purposes as well.
- The display could include concrete art or art piece of a black duck Walbunja.
- Display through art with a story of connection.

## Yarning session about future care and management of artefacts—10 October 2023

A second on-site meeting was held on Tuesday 10 October 2023 to discuss the future care and management of the artefacts recovered from site, to ensure the artefacts are managed in accordance with the wishes of the RAPs and the wider Aboriginal community. The RAPs, the Connecting with Country Project Working Group and members of the wider Aboriginal community were invited to the on-site meeting. During the on-site meeting it was reiterated by the RAPs that attended the session, that the majority result would be the outcome recommended. The potential options for the long-term care and control of the artefacts were discussed prior to comments being provided from the attendees. Table 2 provides a tally of results of the on-site meeting. The most preferred option recommended by the participants was to rebury all artefacts and include an educational or interpretive display of the artefacts, potentially as an artwork in the hospital.

**Table 2 Results of the yarning session**

Long term care and control option	Count
Reburial of all artefacts, with an interpretative display	9
Display of artefacts	8
Reburial of all artefacts (no display)	4
Undecided	2
No comment	2

### Comments from the Yarning session

Specific comments from the yarning session were noted down and passed on to the project team for the Eurobodalla Regional Hospital project. During the meeting, the community provided lots of ideas, thoughts and feedback for consideration and deliberation. Some of the key themes are included below:

- If artefacts are to be reburied, they should not be reburied in plastic—they should be separated out (as we cannot determine if artefacts are from men’s or women’s business)—and culturally reburied.
- Keep the connection and story of the site and the artefacts linked together.
- Creation of a cultural yarning area that could incorporate a garden.
- Sign/plaque to acknowledge the traditional owners of the area.
- Digital display with Elders telling stories that can be shared with people visiting the Hospital.
- Entrance monument to acknowledge Country, and to also have a meeting place when entering through the gates of the Hospital.
- There were also concerns regarding the safety and protection of the artefacts (whether they are reburied or displayed).
- Statement/plaque to welcome people and acknowledge the Country and Traditional Owners. Cultural safety was also raised—for people to feel culturally safe if from a different Country.
- Acknowledgement of men’s and women’s business in a plaque.
- Educational displays (i.e. knapping) videos of community members knapping in digital display.
- Use of artefacts to create artwork.
- Digital story telling—as a way to share knowledge.
- Artists within the local Aboriginal community to create artwork for display in the Hospital.
- Proud of the connection to the land—show this through a display in the Hospital.

### Additional comments received by Biosis following the yarning session

Biosis contacted a list of Aboriginal community representatives via email or phone call following the meeting to reconfirm votes or to follow up with those who may want to amend their choices. To ensure thorough process was undertaken, Biosis contacted all people included in a list that was provided by the Manager – Aboriginal Community Engagement at Southern NSW LHD. No changes to the results from the second on-site meeting were noted, therefore ‘reburial of all artefacts with an interpretive display’ is still the majority result. The following additional comments were received during this consultation:

- There should be a display/interpretation of the artefacts in the Hospital reception foyer.
- If reburial is the outcome, no artefacts are to be reburied in plastic bags, and this should be a cultural reburial.

### Consultation with the RAPs

Biosis has undertaken consultation with the RAPs for this project and have received the following comments:

- The RAPs for the project should have the final say about the long-term care and control of the artefacts - this would be in line with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010) (consultation requirements). The comments and views from the wider Aboriginal community who did participate in the consultation regarding the artefacts will also be acknowledged and respected.
- Reburial of the artefacts is the preferred option.

### Recommendations

This report has reviewed the comments received from the RAPs, the Connecting with Country Project Working Group, and the wider Aboriginal community regarding the long-term care and control of the artefacts identified by the archaeological salvage works. Based on the consultation undertaken and outlined in this report it is recommended that:

1. All artefacts are reburied on site, in a cultural reburial with no plastic involved.
2. The community felt strongly that the story of the of Aboriginal community and the artefacts found should be told as part of the Eurobodalla Regional Hospital project. This could be done via an interpretation of the artefacts discovered on site and undertaken in a way which highlights connections to Country and to share knowledge in a safe and culturally appropriate way.
3. Further consultation on the interpretation and design element of the project should be undertaken by the project team in consultation with the RAPs and the Connecting with Country Project Working Group. This consultation will consider how to share knowledge in a safe and culturally appropriate way and will allow for the RAPs and the Connecting with Country Project Working Group to expand upon the comments and ideas provided.

The combination of these recommendations will aid in telling the story of the site. These recommendations incorporate the wishes of the RAPs in line with the consultation requirements and are in accordance with the majority result of the consultation undertaken as outlined in this report (Table 2). Reburial of all artefacts with an interpretive display was the most preferred result, which also provides a compromise between members who wanted to display the artefacts in the Hospital and those who only wanted a reburial. This recommendation incorporates all the feedback received to date from the Connecting with Country Project Working Group and wider Aboriginal community.

This report and recommendations will be circulated to the community and presented at the Connecting with Country Project Working Group held in December 2023. It would be greatly appreciated if this report could be reviewed, and any feedback provided by **5:00PM Tuesday 23 January 2024**.



Please contact me if you have any enquiries.

Yours sincerely,



Anthea Vella  
Senior Heritage Consultant

## Anthea Vella

---

**From:** Anthea Vella  
**Sent:** Tuesday, 31 October 2023 2:04 PM  
**Cc:** Crystal Garabedian  
**Subject:** 37940 - Eurobodalla Regional Hospital - AHIP 5060  
**Attachments:** AHIP5060 - Soil Conservation proposed Eurobodalla Regional Hospital - Health Administration Corporation - 23 March 2023.pdf

Good afternoon,

I hope you have been well.

Please find attached the copy of AHIP 5060 for the Eurobodalla Regional Hospital that was issued on 23 March 2023.

My apologies if this was not sent to you sooner. Please note that the archaeological salvage works have been completed and the artefact analysis and salvage report are currently underway.

If you have any questions please let myself or Crystal know.

Kind regards,

Anthea

**Anthea Vella** She / Her  
Senior Heritage Consultant

📠 0427 463 834  
☎ (02) 4911 4047  
✉ AVella@biosis.com.au  
🌐 www.biosis.com.au



### Leaders in Ecology, Heritage and Environmental Approvals

**Biosis acknowledges the Aboriginal and Torres Strait Islander people as Traditional Custodians of the country on which we live and work. We pay our respects to the Traditional Custodians and Elders past, present and future, and honour their connection to the land and on**

The information transmitted including attachments is intended only for the person or entity to which it is addressed and may contain copyright material, or information that is controlled by law. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is in error, please contact the sender and delete the material from your computer. The views expressed in this email are those of the sender except where the sender expressly states otherwise. They do not represent the views of Biosis Pty Ltd. Biosis Pty Ltd does not represent that this email is free of errors, viruses or interference. When using email to communicate with Biosis Pty Ltd, the liability of Biosis Pty Ltd personnel is strictly limited and controlled.

## **Anthea Vella**

---

**From:** Anthea Vella  
**Sent:** Wednesday, 27 March 2024 10:21 AM  
**Subject:** 37940 - Eurobodalla Regional Hospital - Project Update - March 2024

Good morning,

I hope you have been well.

Following on from your registration in the Eurobodalla Regional Hospital ACHA, please be advised that the salvage report is currently being prepared.

The draft report will be issued to you when ready.

If you have any questions, please let me know.

Kind regards,

Anthea

**Anthea Vella** She / Her  
Senior Heritage Consultant

📞 0427 463 834  
✉ AVella@biosis.com.au  
🌐 www.biosis.com.au



### **Leaders in Ecology, Heritage and Environmental Approvals**

**Biosis acknowledges the Aboriginal and Torres Strait Islander people as Traditional Custodians of the country on which we live and work. We pay our respects to the Traditional Custodians and Elders past, present and future, and honour their connection to the land and on country.**

The contents of this email message and any attachments are intended solely for the addressee(s) and may be the subject of copyright. If you have received this email in error, notify us by return email, destroy all copies and delete it from your systems. It is your responsibility to scan this communication and any files attached (and Biosis does not accept liability for computer viruses, interference or similar).

**From:** [Anthea Vella](#)  
**To:** [REDACTED]  
**Cc:** [Crystal Garabedian](#)  
**Subject:** 37940 - Eurobodalla Regional Hospital - Heritage Interpretation Strategy and Draft Aboriginal Cultural Heritage Management Plan  
**Date:** Thursday, 9 May 2024 11:15:45 AM  
**Attachments:** [image184580.png](#)  
[image550224.png](#)  
[image647203.png](#)  
[image384860.png](#)

---

Good morning,

I hope this email finds you well. We are reaching out to inform you of two documents for your information and awareness: The Aboriginal Cultural Heritage Management Plan (ACHMP) and Heritage Interpretation Strategy for the Eurobodalla Regional Hospital. These documents can be downloaded via the link below:

<https://we.tl/t-0rplwo3bjk>

Please be advised that this link will expire on June 8 2024. If you have any issues accessing the two documents please let me know.

These documents serve distinct purposes, to keep you informed and provide opportunity for feedback, as well as ensure that we meet all necessary development application and town planning requirements. Here is a brief overview of each document:

#### 1. Aboriginal Cultural Heritage Management Plan

The ACHMP is a comprehensive framework outlining the project's commitment to respecting and preserving Aboriginal Cultural Heritage. It sets out specific strategies and protocols for managing Aboriginal cultural sites, both during construction and throughout the operational lifespan of the hospital. By effectively implementing this plan, we aim to foster meaningful relationships with Aboriginal stakeholders and promote cultural understanding within the community. Importantly, it demonstrates our project's alignment with town planning requirements to ensure that our activities are conducted in accordance with regulatory standards.

#### 2. Heritage Interpretation Strategy

The Heritage Interpretation Strategy focuses on enhancing our understanding and appreciation of local heritage and cultural significance. It provides a roadmap for interpreting and presenting this heritage to residents and visitors, fostering deeper connections with the local history and identity.

Through the project lifecycle, this Heritage Interpretation Strategy will transition into a Heritage Interpretation Plan, exploring methods of interpreting and presenting local heritage. These methods will be explored in collaboration with the community to agree on ways to respect the local heritage prior to implementation at the site. This directly relates to the management of artefacts found on site and the proposed Arts Interpretation.

Feedback on the ACHMP and Heritage Interpretation Strategy is welcome and would be appreciated by **5PM 6 June 2024**.

As we progress, the next steps will involve completing the consultation process with both the community and Heritage NSW. A community meeting is planned to undertake this consultation and details will start to be circulated shortly. Your feedback and input are invaluable as we work together to shape these initiatives to promote and preserve the community's cultural heritage and we look forward to re-engaging further on artefact repatriation.

We understand the importance of maintaining open communication and collaboration with the community and we are committed to keeping you informed and involved every step of the way.

Please take the time to review the attached documents and feel free to reach out to us with any questions, feedback or suggestions you may have.

Kind regards,

Anthea

**Anthea Vella** She / Her  
Senior Heritage Consultant

📞 0427 463 834  
✉ [AVella@biosis.com.au](mailto:AVella@biosis.com.au)  
🌐 [www.biosis.com.au](http://www.biosis.com.au)



**Leaders in Ecology, Heritage and Environmental Approvals**

Biosis acknowledges the Aboriginal and Torres Strait Islander people as Traditional Custodians of the country on which we live and work.

**We pay our respects to the Traditional Custodians and Elders past, present and future, and honour their connection to the land and ongoing contribution to society.**

The contents of this email message and any attachments are intended solely for the addressee(s) and may be the subject of copyright. If you have received this email in error, please do not use it in any way, notify us by return email, destroy all copies and delete it from your systems. It is your responsibility to scan this communication and any files attached (and Biosis does not accept any liability whatsoever) for computer viruses, interference or similar.



From: [Anthea Vella](#)  
Cc: [Crystal Garabedian](#)  
Bcc:

Subject: RE: 37940 - Eurobodalla Regional Hospital - Heritage Interpretation Strategy and Draft Aboriginal Cultural Heritage Management Plan  
Date: Thursday, 30 May 2024 8:24:01 AM  
Attachments: [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image267890.png](#)  
[image710159.png](#)  
[image461580.png](#)  
[image891022.png](#)

Good morning,

This is a reminder email that feedback on the draft ACHMP and Heritage Interpretation Strategy is welcome and would be appreciated by **5PM 6 June 2024**.

Please note that I will be on leave from 6-28 June, please direct any questions to Crystal in this time on the details below:

**Crystal Garabedian** She/Her  
Heritage Consultant and Business Development Lead (NSW)  
📞 0456 625 253  
✉️ [CGarabedian@biosis.com.au](mailto:CGarabedian@biosis.com.au)

Kind regards,

Anthea

**Anthea Vella** She / Her  
Senior Heritage Consultant

📞 0427 463 834  
✉️ [AVella@biosis.com.au](mailto:AVella@biosis.com.au)  
🌐 [www.biosis.com.au](http://www.biosis.com.au)



#### Leaders in Ecology, Heritage and Environmental Approvals

Biosis acknowledges the Aboriginal and Torres Strait Islander people as Traditional Custodians of the country on which we live and work.

**We pay our respects to the Traditional Custodians and Elders past, present and future, and honour their connection to the land and ongoing contribution to society.**

The contents of this email message and any attachments are intended solely for the addressee(s) and may be the subject of copyright. If you have received this email in error, please do not use it in any way, notify us by return email, destroy all copies and delete it from your systems. It is your responsibility to scan this communication and any files attached (and Biosis does not accept any liability whatsoever) for computer viruses, interference or similar.

**From:** Anthea Vella <[AVella@biosis.com.au](mailto:AVella@biosis.com.au)>

**Sent:** Thursday, May 9, 2024 11:19 AM

**Subject:** 37940 - Eurobodalla Regional Hospital - Heritage Interpretation Strategy and Draft Aboriginal Cultural Heritage Management Plan

Good morning,

I hope this letter finds you well. We are reaching out to inform you of two documents for your information and awareness: The Aboriginal Cultural Heritage Management Plan (ACHMP) and Heritage Interpretation Strategy for the Eurobodalla Regional Hospital.

These documents serve distinct purposes, to keep you informed and provide opportunity for feedback, as well as ensure that we meet all necessary development application and town planning requirements. Here is a brief overview of each document:

#### 1. Aboriginal Cultural Heritage Management Plan

The ACHMP is a comprehensive framework outlining the project's commitment to respecting and preserving Aboriginal Cultural Heritage. It sets out specific strategies and protocols for managing Aboriginal cultural sites, both during construction and throughout the operational lifespan of the hospital. By effectively implementing this plan, we aim to foster meaningful relationships with Aboriginal stakeholders and promote cultural understanding within the community. Importantly, it demonstrates our project's alignment with town planning requirements to ensure that our activities are conducted in accordance with regulatory standards.

#### 2. Heritage Interpretation Strategy

The Heritage Interpretation Strategy focuses on enhancing our understanding and appreciation of local heritage and cultural significance. It provides a roadmap for interpreting and presenting this heritage to residents and visitors, fostering deeper connections with the local history and identity.

Through the project lifecycle, this Heritage Interpretation Strategy will transition into a Heritage Interpretation Plan, exploring methods of interpreting and presenting local heritage. These methods will be explored in collaboration with the community to agree on ways to respect the local heritage prior to implementation at the site. This directly relates to the management of artefacts found on site and the proposed Arts Interpretation.

Feedback on the ACHMP and Heritage Interpretation Strategy is welcome and would be appreciated by **5PM 6 June 2024**.

As we progress, the next steps will involve completing the consultation process with both the community and Heritage NSW. A community meeting is

planned to undertake this consultation and details will start to be circulated shortly. Your feedback and input are invaluable as we work together to shape these initiatives to promote and preserve the community's cultural heritage and we look forward to re-engaging further on artefact repatriation.

We understand the importance of maintaining open communication and collaboration with the community and we are committed to keeping you informed and involved every step of the way.

Please take the time to review the attached documents and feel free to reach out to us with any questions, feedback or suggestions you may have.

Kind regards,

Anthea

**Anthea Vella** She / Her  
Senior Heritage Consultant

☎ 0427 463 834  
✉ [AVella@biosis.com.au](mailto:AVella@biosis.com.au)  
🌐 [www.biosis.com.au](http://www.biosis.com.au)



**Leaders in Ecology, Heritage and Environmental Approvals**

**Biosis acknowledges the Aboriginal and Torres Strait Islander people as Traditional Custodians of the country on which we live and work.**

**We pay our respects to the Traditional Custodians and Elders past, present and future, and honour their connection to the land and ongoing contribution to society.**

The contents of this email message and any attachments are intended solely for the addressee(s) and may be the subject of copyright. If you have received this email in error, please do not use it in any way, notify us by return email, destroy all copies and delete it from your systems. It is your responsibility to scan this communication and any files attached (and Biosis does not accept any liability whatsoever) for computer viruses, interference or similar.

**Anthea Vella** She / Her  
Senior Heritage Consultant

☎ 0427 463 834  
✉ [AVella@biosis.com.au](mailto:AVella@biosis.com.au)  
🌐 [www.biosis.com.au](http://www.biosis.com.au)



**Leaders in Ecology, Heritage and Environmental Approvals**

**Biosis acknowledges the Aboriginal and Torres Strait Islander people as Traditional Custodians of the country on which we live and work.**

**We pay our respects to the Traditional Custodians and Elders past, present and future, and honour their connection to the land and ongoing contribution to society.**

The contents of this email message and any attachments are intended solely for the addressee(s) and may be the subject of copyright. If you have received this email in error, please do not use it in any way, notify us by return email, destroy all copies and delete it from your systems. It is your responsibility to scan this communication and any files attached (and Biosis does not accept any liability whatsoever) for computer viruses, interference or similar.

**From:** [lilly carroll](#)  
**To:** [Anthea Vella](#)  
**Subject:** Re: 37940 - Eurobodalla Regional Hospital - Heritage Interpretation Strategy and Draft Aboriginal Cultural Heritage Management Plan  
**Date:** Thursday, 30 May 2024 1:03:19 PM  
**Attachments:** [image891022.png](#)  
[image461580.png](#)  
[image710159.png](#)  
[image267890.png](#)  
[image004.png](#)  
[image003.png](#)  
[image002.png](#)  
[image001.png](#)

---

Hi Anthea

Please keep us updated

[Sent from Yahoo Mail for iPhone](#)

On Thursday, May 30, 2024, 8:24 AM, Anthea Vella <[AVella@biosis.com.au](mailto:AVella@biosis.com.au)> wrote:

Good morning,

This is a reminder email that feedback on the draft ACHMP and Heritage Interpretation Strategy is welcome and would be appreciated by **5PM 6 June 2024**.

Please note that I will be on leave from 6-28 June, please direct any questions to Crystal in this time on the details below:

**Crystal Garabedian** She/Her  
Heritage Consultant and Business Development Lead (NSW)  
📞 0456 625 253  
✉️ [CGarabedian@biosis.com.au](mailto:CGarabedian@biosis.com.au)

Kind regards,

Anthea

**Anthea Vella** She / Her  
Senior Heritage Consultant

📞 0427 463 834  
✉️ [AVella@biosis.com.au](mailto:AVella@biosis.com.au)  
🌐 [www.biosis.com.au](http://www.biosis.com.au)



**Leaders in Ecology, Heritage and Environmental Approvals**

Biosis acknowledges the Aboriginal and Torres Strait Islander people as Traditional Custodians of the country on which we live and work.

We pay our respects to the Traditional Custodians and Elders past, present and future, and honour their connection to the land and ongoing contribution to society.

The contents of this email message and any attachments are intended solely for the addressee(s) and may be the subject of copyright. If you have received this email in error, please do not use it in any way, notify us by return email, destroy all copies and delete it from your systems. It is your responsibility to scan this communication and any files attached (and Biosis does not accept any liability whatsoever) for computer viruses, interference or similar.

**From:** Anthea Vella <[AVella@biosis.com.au](mailto:AVella@biosis.com.au)>

**Sent:** Thursday, May 9, 2024 11:19 AM

**Subject:** 37940 - Eurobodalla Regional Hospital - Heritage Interpretation Strategy and Draft Aboriginal Cultural Heritage Management Plan

Good morning,

I hope this letter finds you well. We are reaching out to inform you of two documents for your information and awareness: The Aboriginal Cultural Heritage Management Plan (ACHMP) and Heritage Interpretation Strategy for the Eurobodalla Regional Hospital.

These documents serve distinct purposes, to keep you informed and provide opportunity for feedback, as well as ensure that we meet all necessary development application and town planning requirements. Here is a brief overview of each document:

**1. Aboriginal Cultural Heritage Management Plan**

The ACHMP is a comprehensive framework outlining the project's commitment to respecting and preserving Aboriginal Cultural Heritage. It sets out specific strategies and protocols for managing Aboriginal cultural sites, both during construction and throughout the operational lifespan of the hospital. By effectively implementing this plan, we aim to foster meaningful relationships with Aboriginal stakeholders and promote cultural understanding within the community. Importantly, it demonstrates our project's alignment with town planning requirements to ensure that our activities are conducted in accordance with regulatory standards.

**2. Heritage Interpretation Strategy**

The Heritage Interpretation Strategy focuses on enhancing our understanding and appreciation of local heritage and cultural significance. It provides a roadmap for interpreting and presenting this heritage to residents and visitors, fostering deeper connections with the local history and identity.

Through the project lifecycle, this Heritage Interpretation Strategy will transition into a Heritage Interpretation Plan, exploring methods of interpreting and presenting local heritage. These methods will be explored in collaboration with the community to agree on ways to respect the local heritage prior to implementation at the site. This directly relates to the management of artefacts found on site and the proposed Arts Interpretation.

Feedback on the ACHMP and Heritage Interpretation Strategy is welcome and would be appreciated by **5PM 6 June 2024**.

As we progress, the next steps will involve completing the consultation process with both the community and Heritage NSW. A community meeting is planned to undertake this consultation and details will start to be circulated shortly. Your feedback and input are invaluable as we work together to shape these initiatives to promote and preserve the community's cultural heritage and we look forward to re-engaging further on artefact repatriation.

We understand the importance of maintaining open communication and collaboration with the community and we are committed to keeping you informed and involved every step of the way.

Please take the time to review the attached documents and feel free to reach out to us with any questions, feedback or suggestions you may have.

Kind regards,

Anthea

**Anthea Vella** She / Her  
Senior Heritage Consultant

📞 0427 463 834  
✉️ [AVella@biosis.com.au](mailto:AVella@biosis.com.au)  
🌐 [www.biosis.com.au](http://www.biosis.com.au)



**Leaders in Ecology, Heritage and Environmental Approvals**

Biosis acknowledges the Aboriginal and Torres Strait Islander people as Traditional Custodians of the country on which we live and work.

**We pay our respects to the Traditional Custodians and Elders past, present and future, and honour their connection to the land and ongoing contribution to society.**

The contents of this email message and any attachments are intended solely for the addressee(s) and may be the subject of copyright. If you have received this email in error, please do not use it in any way, notify us by return email, destroy all copies and delete it from your systems. It is your responsibility to scan this communication and any files attached (and Biosis does not accept any liability whatsoever) for computer viruses, interference or similar.

**Anthea Vella** She / Her  
Senior Heritage Consultant

📞 0427 463 834  
✉️ [AVella@biosis.com.au](mailto:AVella@biosis.com.au)  
🌐 [www.biosis.com.au](http://www.biosis.com.au)



**Leaders in Ecology, Heritage and Environmental Approvals**

Biosis acknowledges the Aboriginal and Torres Strait Islander people as Traditional Custodians of the country on which we live and work.

**We pay our respects to the Traditional Custodians and Elders past, present and future, and honour their connection to the land and ongoing contribution to society.**

The contents of this email message and any attachments are intended solely for the addressee(s) and may be the subject of copyright. If you have received this email in error, please do not use it in any way, notify us by return email, destroy all copies and delete it from your systems. It is your responsibility to scan this communication and any files attached (and Biosis does not accept any liability whatsoever) for computer viruses, interference or similar.

## Anthea Vella

---

**From:** Anthea Vella  
**Sent:** Wednesday, 10 July 2024 10:33 AM  
**Cc:** Crystal Garabedian  
**Subject:** 37940 - Eurobodalla Regional Hospital - Updated Draft ACHMP - For Review  
**Attachments:** 37940.Eurobodalla.Regional.Hospital.ACHMP.DFT03.20240626.pdf

Good morning,

Following on from your registration in the Eurobodalla Regional Hospital project, please find attached the updated draft Aboriginal Cultural Heritage Management Plan (ACHMP).

The following updates have been made:

- The study area boundary has been amended to align with the area of land covered by the State Significant Development Approval (SSD-56989722) (all figures in the document are updated)
- Proposed additional excavations and methodology (Section 6.1.5)
- Strategy for monitoring for tree removal (Section 6.1.6)
- Inclusion of AHIMS 58-4-1261/Lot 69 South Head Road 1 as a site that may require management under the ACHMP (Section 3.1, Section 6.1.5 and Section 6.1.6)

As part of the review of the ACHMP Biosis is seeking feedback on whether monitoring for tree removal or excavations are preferred. Please see Section 6.1.5 and Section 6.1.6 of the ACHMP for details on the strategy.

It would be greatly appreciated if feedback could be provided by **5PM 7 August 2024**.

If you have any questions, please let myself or Crystal know.

Kind regards,

Anthea



## Appendix 5 Heritage NSW consultation

Heritage NSW has reviewed the draft ACHMP and provided the following comments in the table below. Biosis has also included response to where the ACHMP has been updated. A copy of the correspondence from Heritage NSW has also been included.

Heritage NSW	Biosis response
<b>1</b>	
Please update Section 1.2 to ensure that the study area for the ACHMP is consistent with the area of land covered by the Instrument of Consent for SSD-56989722. Specifically, this section must be updated to include reference to the area of land associated with the road access from Caswell Street (Part of Albert Street [Road Reserve]) and tree removal area (i.e. Lot 69 DP 752151) consistent with the Approved Plans.	Section 1.2 of the ACHMP has been updated to include this: "The study area comprises of Lot 2 DP 128576, part of Lot 69 DP 752151, and the northern road reserve (part of the Albert Street road reserve)."
<b>2</b>	
Please clarify the stages of the project which are covered by the ACHMP (e.g. construction and/or operation) and ensure consistency throughout the document. Note that the introduction states that the ACHMP "manages the impacts to Aboriginal heritage during construction" pg.1. while Section 1.4 states that the purpose of the ACHMP is "to describe how Aboriginal heritage will be protected and managed ... during the operational life of the project" pg.3.	Section 1.4 and Section 6.1.1 of the ACHMP have been updated to the "construction" of the project rather than the "operational life".
<b>3</b>	
Update Section 2 to provide details of the development consents/permits that are applicable to the area of land and works covered by the ACHMP including the current SSD approval as well as the valid Aboriginal Heritage Impact Permit (AHIP). Please include details of duration of the AHIP and a map of the AHIP area showing how it relates to the ACHMP area. A copy of the AHIP should also be included as an Appendix to the ACHMP.	Section 2 of the ACHMP has been updated to include the development consents/permits for the SSD and REF approvals. Appendix 9 has been included which includes the AHIP and a figure of the AHIP area.
<b>4</b>	
Update Figure 4 to include the registered location of AHIMS 58-4-1580. Please also update this figure, or provide another figure, which shows the boundaries of the Aboriginal heritage sites associated with the ACHMP.	Figure 4 has been updated to include the location of AHIMS 58-4-1580.
<b>5</b>	
Update Section 5 to include a list of the Registered Aboriginal Parties (RAPs) for the project.	Section 5 has been updated to include a list of RAPs.
<b>6</b>	
Update Section 6.1.1 to include involvement of RAPs in any monitoring of ground disturbing works (Strategy 6),	Section 6.1.1 has been updated to include this.

Heritage NSW	Biosis response
any additional excavation works (Strategy 5) and the implementing the long-term management/ reburial of artefacts (Strategy 8) that may be undertaken under the ACHMP.	
<b>7</b>	
Section 6.1.3 requires more detail in relation to the conditions of the AHIP and their status at the time of preparing the draft ACHMP in order to satisfy Condition B33(c)(iii) of the Instrument of Consent. This could be addressed by providing a summary table outlining the AHIP condition number, the actions required, any specific timeframes involved, and the current status (i.e. whether the condition has been satisfied).	Section 6.1.3 has been updated to include this, and the AHIP condition and status, as well as the AHIP has been included in Appendix 9.
<b>8</b>	
The text for "Strategy 7" should be reformatted so that it appears under its own heading/section consistent with the other strategies. This information is currently merged with the 'storage of cultural material' text associated with the previous strategy.	This has been updated and is now Section 6.1.7 of the ACHMP.
<b>9</b>	
Please clarify whether Strategy 13 in Section 6.1.12 relates specifically to future works that may be required outside of the approved SSD boundary (i.e. outside of the approved disturbance area) and thus would require further assessment and a modification to the SSD approval.	This has been updated in Section 6.1.13-Strategy 13 (previously Section 6.1.12).
<b>10</b>	
Update Section 6.1.14 (Strategy 15) to include circumstances where a review and potential revision of the ACHMP may be triggered consistent with the procedures outlined in Section 6.1.8, Section 6.1.9, and Section 6.1.10 (e.g. in the event that ancestral remains, unexpected Aboriginal objects, or unexpected heritage/non-Aboriginal objects are encountered). This section could also cross reference Section 9.2 which also relates to updates and amendments to the ACHMP.	This has been updated (now Section 6.1.15).
<b>11</b>	
Update Section 6.1.16 (Strategy 17) to include reference to the specific Aboriginal heritage sites located outside of, but in close proximity to, the project disturbance area which will require protective fencing prior to ground disturbance works nearby. To ensure the efficacy of this strategy, provide details of the sites including a map showing the location and boundary of the relevant sites and an identification of any safety buffers to be established around the site/s.	This has been updated in Section 6.1.17 (Strategy 17) with reference to Figure 4.

Heritage NSW	Biosis response
<b>12</b>	
Update Section 6.1.16 (Strategy 17), or include a new Strategy, which outlines the protective measures that will be implemented for the 'No-go-area' within the ACHMP study area to ensure the protection and ongoing management of sites Moruya Scarred Tree 1 (AHIMS 58-4-1466), Moruya scarred tree 2 (AHIMS 58-5-1467), Moruya scarred tree 3 (AHIMS 58-4-1468) as required by Condition B33(c)(v) of the Instrument of Consent.	This is included in Section 6.1.17 (Strategy 7).
<b>13</b>	
Update Section 7.3 to include notification of Environmental Line on 131 555 where the incident relates to potential harm to an Aboriginal object not covered by an existing project approval.	This has been updated in Section 7.3
<b>14</b>	
Please update Appendix 1 to include artefact scatters and isolated finds consistent with that fact that this site type/feature is the mostly likely to occur within the ACHMP area.	Appendix 1 has been updated.

Our ref: DOC24/678628

Kathryn Saunders

Senior Advisor, Town Planning (Post Approval & Compliance)

Capital & Commercial Advisory

Health Infrastructure

[kathryn.saunders@health.nsw.gov.au](mailto:kathryn.saunders@health.nsw.gov.au)

Letter uploaded to the Major Projects Planning Portal

---

## Aboriginal Cultural Heritage Management Plan – State Significant Development

**Proposal:** New Eurobodalla Regional Hospital

**Major Project reference:** SSD-56989722-PA-2

**Received:** 21 August 2024

Dear Kathryn

Thank you for your referral seeking advice on the draft Aboriginal Cultural Heritage Management Plan (ACHMP) prepared by Biosis Pty Ltd, dated 16 August 2024 for the above State Significant Development. Thank you for the continued opportunity to comment on the project.

It is understood that the draft ACHMP encompasses the New Eurobodalla Regional Hospital, covered by the approval for SSD-56989722 and has been developed in accordance with Condition B33 of the Instrument of Consent. Heritage NSW supports the mitigation and management measures outlined in the ACHMP; however, the following updates are required:

- Please update Section 1.2 to ensure that the study area for the ACHMP is consistent with the area of land covered by the Instrument of Consent for SSD-56989722. Specifically, this section must be updated to include reference to the area of land associated with the road access from Caswell Street (Part of Albert Street [Road Reserve]) and tree removal area (i.e. Lot 69 DP 752151) consistent with the Approved Plans.
- Please clarify the stages of the project which are covered by the ACHMP (e.g. construction and/or operation) and ensure consistency throughout the document. Note that the introduction states that the ACHMP "*manages the impacts to Aboriginal heritage during construction*" pg.1. while Section 1.4 states that the purpose of the ACHMP is "*to describe how Aboriginal heritage will be protected and managed... during the operational life of the project*" pg.3.
- Update Section 2 to provide details of the development consents/permits that are applicable to the area of land and works covered by the ACHMP including the current SSD approval as well as

the valid Aboriginal Heritage Impact Permit (AHIP). Please include details of duration of the AHIP and a map of the AHIP area showing how it relates to the ACHMP area. A copy of the AHIP should also be included as an Appendix to the ACHMP.

- Update Figure 4 to include the registered location of AHIMS 58-4-1580. Please also update this figure, or provide another figure, which shows the boundaries of the Aboriginal heritage sites associated with the ACHMP.
- Update Section 5 to include a list of the Registered Aboriginal Parties (RAPs) for the project.
- Update Section 6.1.1 to include involvement of RAPs in any monitoring of ground disturbing works (Strategy 6), any additional excavation works (Strategy 5) and the implementing the long-term management / reburial of artefacts (Strategy 8) that may be undertaken under the ACHMP.
- Section 6.1.3 requires more detail in relation to the conditions of the AHIP and their status at the time of preparing the draft ACHMP in order to satisfy Condition B33(c)(iii) of the Instrument of Consent. This could be addressed by providing a summary table outlining the AHIP condition number, the actions required, any specific timeframes involved, and the current status (i.e. whether the condition has been satisfied).
- The text for "Strategy 7" should be reformatted so that it appears under its own heading/section consistent with the other strategies. This information is currently merged with the 'storage of cultural material' text associated with the previous strategy.
- Please clarify whether Strategy 13 in Section 6.1.12 relates specifically to future works that may be required outside of the approved SSD boundary (i.e. outside of the approved disturbance area) and thus would require further assessment and a modification to the SSD approval.
- Update Section 6.1.14 (Strategy 15) to include circumstances where a review and potential revision of the ACHMP may be triggered consistent with the procedures outlined in Section 6.1.8, Section 6.1.9, and Section 6.1.10 (e.g. in the event that ancestral remains, unexpected Aboriginal objects, or unexpected heritage/non-Aboriginal objects are encountered). This section could also cross-reference Section 9.2 which also relates to updates and amendments to the ACHMP.
- Update Section 6.1.16 (Strategy 17) to include reference to the specific Aboriginal heritage sites located outside of, but in close proximity to, the project disturbance area which will require protective fencing prior to ground disturbance works nearby. To ensure the efficacy of this strategy, provide details of the sites including a map showing the location and boundary of the relevant sites and an identification of any safety buffers to be established around the site/s.
- Update Section 6.1.16 (Strategy 17), or include a new Strategy, which outlines the protective measures that will be implemented for the 'No-go-area' within the ACHMP study area to ensure the protection and ongoing management of sites Moruya Scarred Tree 1 (AHIMS 58-4-1466), Moruya scarred tree 2 (AHIMS 58-5-1467), Moruya scarred tree 3 (AHIMS 58-4-1468) as required by Condition B33(c)(v) of the Instrument of Consent.
- Update Section 7.3 to include notification of Environmental Line on 131 555 where the incident relates to potential harm to an Aboriginal object not covered by an existing project approval.
- Please update Appendix 1 to include artefact scatters and isolated finds consistent with that fact that this site type/feature is the mostly likely to occur within the ACHMP area.



Following revision of the ACHMP to address the above comments, please resubmit the Plan to Heritage NSW for comment.

If you have any questions regarding these comments, please contact Marika Low, Senior Assessments Officer, at Heritage NSW on 9873 8500 or [heritagemailbox@environment.nsw.gov.au](mailto:heritagemailbox@environment.nsw.gov.au).

Yours sincerely

*Nicole Davis*

Nicole Davis  
Manager Assessments  
Heritage NSW  
Department of Climate Change, Energy, the Environment and Water  
As Delegate under *National Parks and Wildlife Act 1974*  
11 September 2024

## Appendix 6 Chance/Unexpected Finds Protocol

---

In the event that unexpected Aboriginal objects or sites are located, an assessment will need to be made as to the significance of the object. Appendix 1 contains guidelines around the identification of Aboriginal objects.

The NPW Act defines an Aboriginal object as:

*'...any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains...'*

The following process should be followed with respect to unexpected finds:

- Should any Aboriginal objects be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist.
- A no-go area should be established around the suspected Aboriginal object, and clearly demarcated with flagging tape or similar.
- The archaeologist will investigate and assess the Aboriginal object to determine the nature, extent and significance of the find. This will enable recommendations to be provided on how work can proceed and whether any further work is required. The archaeologist must supply written advice to the project Manager within 24 hours stating:
  - A determination of whether the find is an Aboriginal object.
  - Advice on whether how the project is to proceed and whether the establishment of any no-go areas is necessary.
  - A recommendation on further works that may be required and timeframe for completion of these works.
- Heritage NSW and Aboriginal stakeholders will be notified. This will include a statement concerning the find, management measures implemented and notification of any further works arising. Aboriginal stakeholders are to be involved in any further assessments or works as required.
- AHIMS site cards will be prepared for each new site identified and submitted to AHIMS in accordance with the Code.

Should any Aboriginal objects be identified, this will trigger a review of this ACHMP in accordance with Training and awareness.

## Appendix 7 Management and mitigation measures for the Aboriginal heritage sites within the study area

AHIMS site no.	Site name	Significance	Type of harm	Degree of harm	Consequence of harm	Mitigation measure
<b>AHIMS 58-4-1466</b>	Moruya - Scarred Tree 1	Scar tree	Nil	Nil	No loss of value	Avoidance, ACHMP
<b>AHIMS 58-5-1467</b>	Moruya scarred tree 2	Scar tree	Nil	Nil	No loss of value	Avoidance, ACHMP
<b>AHIMS 58-4-1468</b>	Moruya scarred tree 3	Scar tree	Nil	Nil	No loss of value	Avoidance, ACHMP
<b>AHIMS 58-4-1103</b>	Moruya Site 1	Isolated artefact	Direct	Total	Total loss of value	ACHMP
<b>AHIMS 58-4-1104</b>	Moruya Site 2	Artefact scatter	Direct	Total	Total loss of value	ACHMP
<b>AHIMS 58-4-1317</b>	BF-SU7	Sub-surface isolated artefact	Direct	Total	Total loss of value	ACHMP
<b>AHIMS 58-4-1318</b>	BF-SU9	Sub-surface artefact scatter	Direct	Total	Total loss of value	ACHMP
<b>AHIMS 58-4-1319</b>	BF-SU10	Sub-surface artefact scatter	Direct	Total	Total loss of value	ACHMP
<b>AHIMS 58-4-1320</b>	BF-SU11	Sub-surface artefact scatter	Direct	Total	Total loss of value	ACHMP
<b>AHIMS 58-4-1580</b>	Eurobodalla Site Complex 1	Sub-surface artefact scatter	Direct	Total	Total loss of value	ACHMP
<b>AHIMS 58-4-1261</b>	Lot 69 South Head Road 1	Sub-surface artefact scatter	Direct	Total	Total loss of value	ACHMP

## Appendix 8 ASIRFs

---

**\*\*THE ASIRFS HAVE BEEN REMOVED FOR PUBLIC EXHIBITION\*\*.**

## Appendix 9 AHIP conditions and AHIP 5060

Condition No.	Condition Description	Status
1.	The AHIP holder must ensure that all persons involved in actions or works covered by this AHIP (whether employees, contractors, sub-contractors, agents or invitees) are made aware of and comply with the conditions of this AHIP.	On-going
2.	A suitably qualified and experienced individual must be appointed as a project manager who is responsible for overseeing, for and on behalf of the AHIP holder, all the actions relating to this AHIP.	Complete
3.	The individual appointed as project manager must be the project manager nominated in the application form.	Complete
4.	If an alternative to the nominated project manager is appointed, Heritage NSW must be notified of their contact details within 14 days of this appointment.	On-going
5.	All actions on the land must be carried out in accordance with the application except as otherwise expressly provided by a condition of this AHIP	On-going
6.	All human remains in, on or under the land must not be harmed	On-going
7.	Salvage excavations may be carried out in, on or under each Salvage excavation area described in Schedule B2.	Complete
8.	Aboriginal objects that are recovered during the excavations may be analysed on-site and/or may be taken off-site for further analysis	Complete
9.	The excavations and analysis of Aboriginal objects must be carried out in accordance with methodology provided in Attachment 3 that was provided with the application.	Complete
10.	The excavations must be completed in an area before any harm of Aboriginal objects described in Schedule C can commence in that same area.	Complete
11.	The Registered Aboriginal Parties must be provided with an opportunity to collect Aboriginal objects within the AHIP Area.	Complete - during the salvage excavations no surface artefacts were identified and no community collection was undertaken.
12.	<p>The opportunity for community collection (undertaken in conjunction with the completion of salvage excavations) must be provided:</p> <p>a. in accordance with the following procedure</p> <p>i. Where Aboriginal objects are identified on the ground surface during the course of salvage works, the location of each collected object will be recorded (including photography where applicable) and the object will be placed in a lock-seal plastic bag marked with its location details and a unique identifying number.</p> <p>ii. The collected objects will be held at the temporary storage location and will be subject to recording and analysis in accordance with the methodology provided below; and</p> <p>b. before any harm of Aboriginal objects described in Schedule C can commence in the area.</p>	N/A – during the salvage excavations no surface artefacts were identified and no community collection was undertaken.



Condition No.	Condition Description	Status
13.	Aboriginal objects that are recovered during the community collection may be analysed on-site and/or may be taken off-site for further analysis as decided by the Registered Aboriginal Parties.	N/A – during the salvage excavations no surface artefacts were identified and no community collection was undertaken.
14.	If an opportunity for community collection has been provided and this collection does not occur, the AHIP holder may proceed with any actions to harm Aboriginal objects described in Schedule C, in accordance with the conditions of this AHIP	Complete
15.	The Aboriginal objects described in Schedule C may be harmed over the course of works undertaken in accordance with the approved Review of Environmental Factors prepared by Ethos Urban and determined on 3 February 2023. Nothing in this condition authorises harm to Aboriginal objects described in Schedule A (whether human remains, Aboriginal objects or `no-harm areas') or through activities other than those documented in the approved Review of Environmental Factors prepared by Ethos Urban and determined on 3 February 2023.	On-going
16.	Aboriginal objects described in Schedule C must not be harmed unless: a. all excavations described in Schedule B2 have been completed in the area, and b. all opportunities for community collection of Aboriginal objects described in Schedule B3 have been provided in the area.	Complete
17.	Any Aboriginal objects that are removed from the land by actions authorised by this AHIP, must be moved as soon as practicable to the temporary storage location in the table below, pending any agreement reached about the long term management of the Aboriginal objects.	Complete
18.	The temporary storage location is as follows: Location name: Biosis office Address: 30 Wentworth St, Port Kembla NSW 2505 Storage particulars: Locked cabinet	Complete
19.	Any Aboriginal objects stored at the temporary storage location must not be further harmed, except in accordance with the conditions of this AHIP.	On-going
20.	Any arrangements for long-term care must be subject to consultation with the Registered Aboriginal Parties and (where required) will be the subject of an application for transfer of Aboriginal objects for safekeeping (under Section 85A(1)(c) of the National Parks and Wildlife Act 1974.	Complete– reburial has been identified as the preferred long term care option. Artefact reburial to be undertaken at a later date.
21.	Should the outcome of the consultation be that the objects should be reburied, Requirement 26 "Stone artefact deposition and storage" in the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (24 September 2010, available online at: <a href="https://www.heritage.nsw.gov.au/assets/Code-of-Practice-for-Archaeological-Investigation-in-NSW.pdf">https://www.heritage.nsw.gov.au/assets/Code-of-Practice-for-Archaeological-Investigation-in-NSW.pdf</a> ) must be complied with unless an alternative deposition method is agreed to by the Registered Aboriginal Parties.	On-going - reburial has been identified as the preferred long term care option. Artefact reburial to be undertaken at a later date.

Condition No.	Condition Description	Status
22.	Written notice must be provided to Heritage NSW at least 7 days prior to the commencement of actions authorised by this AHIP	Complete
23.	Written notice must be provided to Heritage NSW within 7 days of the completion of actions authorised by this AHIP.	On-going
24.	A copy of this AHIP must be provided to each Registered Aboriginal Party, within 14 days of receipt of the AHIP from Heritage NSW.	Complete
25.	Where this AHIP is varied or transferred, a copy of the AHIP variation or transfer notice must be provided to each Registered Aboriginal Party, within 14 days of receipt of the notice.	On-going
26.	<p>If any human remains (other than any human remains described in Schedule B4) are discovered and/or harmed in, on or under the land, the AHIP holder must:</p> <ul style="list-style-type: none"> <li>a. not further harm these remains</li> <li>b. immediately cease all work at the particular location</li> <li>c. secure the area so as to avoid further harm to the remains</li> <li>d. notify the local police and DPE's Environment Line on 131 555 as soon as practicable and provide any available details of the remains and their location, and</li> <li>e. not recommence any work at the particular location unless authorised in writing by Heritage NSW.</li> </ul>	On-going
27.	<p>The AHIP holder must notify the Heritage NSW office in writing as soon as practicable after becoming aware of:</p> <ul style="list-style-type: none"> <li>a. any contravention of s.86 of the Act not authorised by an AHIP, and/or</li> <li>b. any contravention of the conditions of this AHIP.</li> </ul>	On-going
28.	<p>Where Heritage NSW suspects that an incident has occurred which may have breached the Act or AHIP, Heritage NSW and/or an Authorised Officer appointed under the National Parks and Wildlife Act 1974 may request a written incident report, which includes the following:</p> <ul style="list-style-type: none"> <li>a. the nature of the incident</li> <li>b. the actual or likely impact of the incident on Aboriginal objects and/or Aboriginal places</li> <li>c. the nature and location of these Aboriginal objects and/or Aboriginal places, referring to and providing maps and photos where appropriate</li> <li>d. any conditions of an AHIP which may have been breached, and</li> <li>e. the measures which have been taken or will be taken to prevent a recurrence of the incident.</li> </ul>	On-going
29.	The incident report must be provided to the Heritage NSW office within the timeframe specified in the request.	On-going
30.	<p>An Aboriginal Site Impact Recording Form must be completed and submitted to the AHIMS Registrar, for each AHIMS site identified in Schedules B and C, within 4 months of the completion of the actions authorised by this AHIP.</p> <p>Note: The Aboriginal Site Impact Recording Form can be found on the website: <a href="https://www.heritage.nsw.gov.au/protecting-our-heritage/record-aboriginal-sites/">https://www.heritage.nsw.gov.au/protecting-our-heritage/record-aboriginal-sites/</a>  Contact details for the AHIMS Registrar can be found on the website: <a href="https://www.heritage.nsw.gov.au/search-for-heritage/aboriginal-heritage-information-management-system/">https://www.heritage.nsw.gov.au/search-for-heritage/aboriginal-heritage-information-management-system/</a></p>	Complete – see Appendix 8.

Condition No.	Condition Description	Status
31.	<p>A Salvage Report must be prepared about the actions relating to the harm of Aboriginal objects (as permitted by this AHIP). The report must:</p> <ol style="list-style-type: none"> <li>include a short summary of the report</li> <li>describe any ongoing consultation with or involvement of representatives of Registered Aboriginal Parties in relation to this AHIP</li> <li>describe how any Aboriginal objects or 'no-harm areas' described in Schedule A were managed during the period covered by the AHIP</li> <li>provide details of the Aboriginal objects which were fully or partially harmed in the course of undertaking the actions</li> <li>if any salvage excavations were authorised by this AHIP, provide a description of the methods and results of the salvage excavation</li> <li>detail any community collection of Aboriginal objects undertaken by the Registered Aboriginal Parties</li> <li>comment on the effectiveness of any mitigation measures that were implemented</li> <li>if any Aboriginal objects were moved to a temporary storage location, a description of the nature and types of Aboriginal objects which are now at that location</li> <li>detail the results of any analysis of Aboriginal objects</li> <li>detail the long term management arrangements for any Aboriginal objects, and</li> <li>include a statement confirming that all Aboriginal Site Impact Recording Forms have been completed and submitted to the AHIMS Registrar</li> </ol>	On-going – the draft salvage report has been reviewed by the RAPs. Once finalised this will be issued to Heritage NSW.
32.	The Salvage Report must be submitted to the Heritage NSW office (heritagemailbox@environment.nsw.gov.au) and the AHIMS Registrar (ahims@environment.nsw.gov.au) within 12 months of the completion of the actions authorised by this AHIP.	On-going
33.	A copy of the Salvage Report, including a summary of the report in plain English, must be sent by registered post to each Registered Aboriginal Party within 14 days of the report being submitted to Heritage NSW.	On-going
34.	<p>The AHIP holder agrees to indemnify and keep indemnified, the Crown in right of NSW, the Minister administering the Act, the Secretary of Department of Planning and Environment, and their employees, agents and contractors, in the absence of any willful misconduct or negligence on their part, from and against all actions, demands, claims, proceedings, losses, damages, costs (including legal costs), charges or expenses suffered or incurred by them resulting from:</p> <ol style="list-style-type: none"> <li>any damage or destruction to any real or personal property; and</li> <li>injury suffered or sustained (including death) by any persons arising out of or in connection with any actions undertaken pursuant to this AHIP.</li> </ol>	On-going
35.	<p>The AHIP holder agrees to release to the full extent permitted by law, the Crown in right of NSW, the Minister administering the Act, the Secretary of Department of Planning and Environment, and, and their employees, agents and contractors, in the absence of any willful misconduct or negligence on their part, from all suits, actions, demands and claims of every kind resulting from:</p> <ol style="list-style-type: none"> <li>any damage or destruction to any real or personal property; and</li> <li>injury suffered or sustained (including death) by any persons arising from or in connection with any actions undertaken pursuant to this AHIP.</li> </ol>	On-going

Condition No.	Condition Description	Status
36.	Any requirement to provide written notice to Heritage NSW in this AHIP may be complied with by emailing the notice to Heritage NSW email address or by sending by registered post to the Heritage NSW address. The Heritage NSW's contact details are specified at the front of this AHIP.	On-going

