# **Appendix B5**

Heritage Management Sub-Plan

**HumeLink West** 

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TransGrid
Date 29/07/2025



## **Document Control**

## **Approvals**

Title	HumeLink West Heritage Management Sub-Plan	
Endorsed by Environment Representative	Derek Low (WolfPeak Group Pty Ltd)	
Approved on behalf of HLWJV by	Tim Burns	
Signed		
Dated		
Reviewer	Nicola Hayes  N. Hayes	
Dated	29/07/2025	



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## HumeLink West Heritage Management Sub-Plan

Annexure I MCoA Appendix 3 Heritage





## **Definitions**

Term	Definition	
Area of disturbance – Aboriginal heritage	Areas dedicated to the construction or upgrades of roads and access tracks, temporary or permanent structures, such as towers, substations, break and winch sites and accommodation facilities, compounds or laydowns or any other area where there is significant or long-term disturbance of ground integrity. It does not include clearing of vegetation if the root balls of trees remain in-situ.	
Enabling Works	An initial stage (as defined under an approved Enabling Works Management Plan under condition B64 of this approval) of the following activities defined as low risk in the Enabling Works Management Plan:  1. Site establishment and the operation of construction compounds,	
	<ul> <li>including excavations, surface preparation, site access points and utility connections;</li> <li>2. Site establishment of worker accommodation facilities;</li> <li>3. Minor adjustments to existing access tracks and road improvement;</li> <li>4. Utility relocations and adjustments;</li> </ul>	
	<ol><li>Establishment of new access tracks in the Enabling Works Management Plan.</li></ol>	
Environmental aspect	Defined by AS/NZS ISO 14001:2015 as an element of an organisation's activities, products or services that can interact with the environment.	
Environmental impact	Defined by AS/NZS ISO 14001:2015 as any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects.	
Environmental incident	ntAn unexpected event that has, or has the potential to, cause harm to the environment and requires some action to minimise the impact or restore the environment.	
Environmental objective	Defined by AS/NZS ISO 14001:2015 as an overall environmental goal, consistent with the environmental policy, that an organisation sets itself to achieve.	
Environmental policy	Statement by an organisation of its intention and principles for environmental performance.	
Environmental target	Defined by AS/NZS ISO 14001:2015 as a detailed performance requirement, applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met to achieve those objectives.	
Environmental Representative	A suitably qualified and experienced person independent of HumeLink design and construction personnel employed for the duration of construction. The principal point of advice in relation to all questions and complaints concerning environmental performance.	
HumeLink Approvals	HumeLink Approvals include.  HumeLink Infrastructure Approval NSW SSI 36656827.  HumeLink EPBC Approval Cth EPBC 2021/9121.	







Term	Definition	
Non-compliance	Failure to comply with the requirements of the HumeLink approvals or any applicable licence, permit or legal requirements.	
Non-conformance	Failure to conform to the requirements of HLW system documentation or supporting documentation, but is not considered a non-compliance.	
Planning Approval Documentation	The NSW planning approval documents, as they relate to the HLW and listed in MCoA A2 of the HumeLink Infrastructure Approval NSW SSI 36656827.	
Principal, the	Transgrid	
Synergy	UGL-EMS incident management software program to manage, report, record and take action on emergency and incidents.	





## **Abbreviations**

Abbreviation	Expanded text	
ACHAR	Aboriginal Cultural Heritage Assessment Report	
AHIP	Aboriginal Heritage Impact Permit	
AR	Addendum Report	
ASS	Acid Sulfate Soils	
ВМР	Biodiversity Management Sub-Plan	
ccs	Community consultation strategy	
CEMP	Construction Environmental Management Plan	
CEMS	Contractors Environmental Management System	
CHL	Commonwealth Heritage List	
CLMP	Contaminated Land Management Procedure	
CoMA	Commonwealth Conditions of Ministerial Approval (EPBC:2021/9121)	
CSSI	Critical State Significant Infrastructure	
Cth	Commonwealth of Australia	
DCCEEW - Cth	The Commonwealth Department of Climate Change, Energy, the Environment and Water	
DCCEEW - NSW	The NSW Department of Climate Change, Energy, the Environment and Water (formerly DPE)	
DPC	Department of the Premier and Cabinet	
DPE	Department of Planning and Environment	
DPHI	Department of Planning, Housing, and Infrastructure (formerly DPE)	
EEC	Endangered Ecological Community	
EESG	Environment, Energy and Science Group	
EIS	Environmental Impact Statement	
EMS	Environmental Management System	
EP&A Act	Environmental Planning and Assessment Act 1979 (NSW)	
EPBC Act	Environmental Protection and Biodiversity Conservation Act 1989 (Cth)	
EPL	Environment Protection Licence	
ER	Environmental Representative	
ESCP	Erosion and Sediment Control Plan	
EWMP	Enabling Works Management Plan	
EWMS	Environmental Work Method Statement	
GIS	Geographic Information System	
HLE	The HumeLink East Stage of the HumeLink project	







Abbreviation	Expanded text		
HLW	The HumeLink West Stage of the HumeLink project		
HLWJV	HumeLink West Joint Venture (UGL Limited and CPB Contractors)		
HMP	Heritage Management Sub-Plan		
LEP	Local Environmental Plan		
Minister (NSW), the	NSW Minister for Planning and Environment		
Minister (Cth), the	Cth Minister for Climate Change, Energy, the Environment and Water		
МСоА	NSW Minister's Conditions of Approval (SSI-36656827)		
NHL	National Heritage List		
NPW Act	National Parks and Wildlife Act 1974 (NSW)		
NPW Regulation	National Parks and Wildlife Amendment Regulation 2010		
NPWS	National Parks and Wildlife Service		
NSW	New South Wales		
NVMP	Noise and Vibration Management Sub-Plan		
OOHW	Out of Hours Works		
PAD	Potential Archaeological Deposit		
PESCP	Progressive Erosion and Sediment Control Plan		
POEO Act	Protection of the Environment Operations Act 1997 (NSW)		
RAP	Registered Aboriginal Parties		
RtS	Response to Submissions Report		
SSI	State Significant Infrastructure, as described in Schedule 1, the carrying ou of which is approved under the terms of the SSI 36656827 approval		
SWMP	Soil and Water Management Sub-Plan		
UMM	Updated environmental Mitigation Measures as outlined in the Planning Approvals Documentation		
UNESCO	United Nations Educational, Scientific and Cultural Organization		



#### 1. Introduction

#### 1.1. Background and project description

Transgrid's HumeLink project (HumeLink) will increase the energy network capacity in southern New South Wales (NSW) through the development of around 360 kilometres (km) of new 500 Kilovolt (kV) high-voltage transmission lines and associated infrastructure between Wagga Wagga, Bannaby and Maragle substations.

HumeLink will involve construction of a new substation east of Wagga Wagga at Gugaa, as well as connection to existing substations at Wagga Wagga and Bannaby and a future substation at Maragle in the Snowy Mountains (referred to as the future Maragle 500 kV substation). The future Maragle 500 kV substation is subject to a separate major project assessment and approvals (reference SSI-9717, EPBC 2018/836).

A Staging Report has been prepared to identify the scope for staging of the HumeLink strategy, plans and programs to meet the Infrastructure Approval requirements in MCoA C3. In accordance with the Staging Report, the scope of work for the project has been divided into two geographically based portions; HumeLink East (HLE) and HumeLink West (HLW) as represented in Figure 1-1. The HLW scope of works during construction is detailed in Section 1.3 of the HLW Construction Environment Management Plan (CEMP).

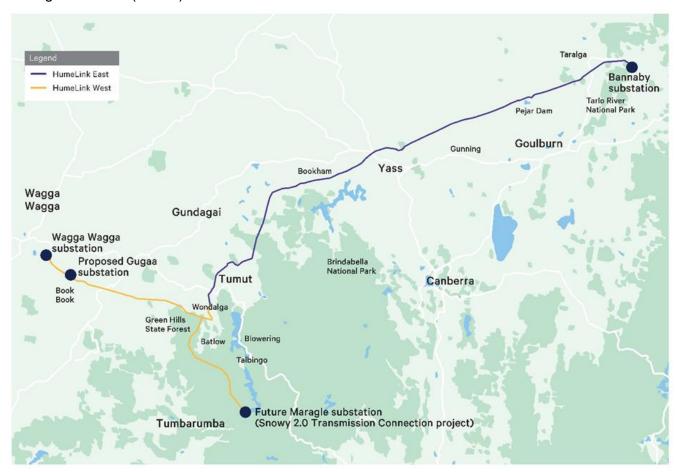


Figure 1-1 Staging for HumeLink



#### 1.2. Context

The Environmental Impact Statement (EIS) was prepared and finalised in August 2023 to assess the impacts of construction and operation of HumeLink and was placed on public exhibition between 30 August to 12 October 2023. A Response to Submissions Report (RtS) along with an Addendum Report (AR) under Section 179(2) of the *Environmental Planning and Assessment Regulation 2021* (EP&A Reg), was prepared and finalised in May 2024.

The NSW Minister for Planning has declared HumeLink to be Critical State Significant Infrastructure (CSSI) as defined under Schedule 5, clause 9 of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP). HumeLink was approved by the NSW Minister for Planning under Division 5.2, Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) on 13 November 2024.

This construction Heritage Management Sub-Plan (HMP or Plan) forms part of the HumeLink West project (HLW) Construction Environmental Management Plan (CEMP). The HMP has been prepared to outline and describe how the UGL Limited and CPB Contractors Joint Venture (HLWJV), during the construction of HLW, will comply with the Minister's Conditions of Approval (MCoA), the Updated environmental Mitigation Measures (UMM), and undertake its duties in accordance with the Planning Approval Documentation listed under MCoA A2 of SSI 36656827.

This HMP has been prepared by:

Nicola Hayes, BA, BSc, GradDipArts (Archaeology), Associate Director Navin Officer Heritage Consultants

Nicola Hayes meets the minimum qualifications for a suitably qualified person as described in Section 1.6 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010b). On 25 July 2025, the Planning Secretary endorsed Nicola Hayes as a suitably qualified and experienced Aboriginal cultural heritage specialist to prepare a HMP for the HumeLink project, in accordance with CoA B33(a).

The background and description of the HumeLink project (HumeLink) and the staging of HumeLink into the HumeLink East project (HLE) and the HumeLink West project (HLW) is detailed in Section 1.1 and Section 1.3 of the CEMP and represented in Figure 1-1.

#### 1.3. Scope

The scope of this Plan is to describe how the HLWJV proposes to manage the HLW Aboriginal and historic heritage commitments during construction of HLW. This plan also describes the responsibilities of the HLWJV team including delivering continuous improvement, the auditing and reporting structure to be used during construction of the HLW.

#### 1.4. Interface with other planning documents

This Plan is a component of a suite of documents, prepared as part of the implementation of the HLW Environmental Management System. The Environmental Management System overview is described in Section 1.4 of the CEMP.

The key documents that interface with this Plan are outlined in Table 1-1 below.





## HumeLink West Heritage Management Sub-Plan

Table 1-1 Key interfaces with this document

Plan	Reference	Interface
Environmental Management Strategy (EMS)	MCoA C1	<ul> <li>Presents the framework for environmental management for construction works carried out by Transgrid and its Delivery Partners (DPs).</li> <li>Represents an overarching document for the Project, with specific environmental management requirements and compliance assurance addressed in the CEMP and relevant subplans.</li> </ul>
Construction Environmental Management Plan (CEMP)	Internal HLW Document	<ul> <li>Provides details on overall HLW staging, interactions between Sub-Plans of the CEMP, and management of cumulative impacts.</li> <li>Provides a framework for how the construction works will be managed.</li> <li>Identifies procedures, processes and management systems that will apply in relation to construction activities that apply across management plans.</li> <li>Provides environmental planning and controls for construction including environmental risk assessment, regulatory requirements, protection measures and sustainability requirements.</li> </ul>
Soil and Water Management Sub-Plan	MCoA B24	<ul> <li>Provides details on HLW management of soils to minimise impacts on soil and water.</li> </ul>
Biodiversity Management Sub-Plan	MCoA B30	<ul> <li>Provides details on HLW management actions to minimise impacts of construction activities on flora and fauna.</li> <li>Identifies procedures, processes and management systems that will apply in relation to construction activities that impact flora and fauna.</li> </ul>
Noise and Vibration Management Sub-Plan	MCoA B16	<ul> <li>Provides details on HLW management actions to minimise potential noise and vibration impacts of construction activities at sensitive receivers.</li> <li>Identifies procedures, processes and management systems that will apply in relation to construction activities that may result in potential noise and vibration impacts at sensitive receivers.</li> </ul>
Sustainability Management Plan	Internal HLW Document	<ul> <li>Identifies the sustainability policy commitments, objectives, and targets for HumeLink West.</li> <li>Describes the key drivers for those commitments.</li> <li>Describes the sustainability management framework.</li> <li>Provides a summary of how the sustainability targets will be met.</li> </ul>









Plan	Reference	Interface
Emergency Management Plan	MCoA B52	<ul> <li>Details framework for health and safety processes</li> <li>Provides health and safety procedures for those wastes that have potential human health risks</li> </ul>
Interface and Third-Party Management Plan	Internal HLW Document	<ul> <li>Details framework for third party interaction.</li> <li>Provides procedures, processes and management systems that will apply in relation third party management.</li> </ul>
Community Communication Strategy	MCoA A24	<ul> <li>Details the framework for management of stakeholders and how to engage them.</li> <li>Provides processes and procedures that guide the outcome of community engagement.</li> <li>Provides a process for communication with Aboriginal stakeholders.</li> </ul>

In addition to the HLWJV's documents, the HMP will also interface with external documents including, but not limited to the HLE works and the Snowy 2.0 Transmission Line works (SSI-9717).

These documents are separate to the UGL-EMS and do not form part of the approval of this CEMP document and will be managed through the HLWJV Interface Management Plan to assist in the management of cumulative impacts.



## 2. Purpose and objectives

#### 2.1. Purpose

This plan describes the HLWJV approach to heritage management during construction of HLW. This Plan addresses the construction management requirements detailed within the HumeLink Infrastructure Approval NSW SSI 36656827 and HumeLink EPBC Approval Cth EPBC 2021/9121 (HumeLink Approvals). This includes the Planning Approval Documentation listed in the Minister's Conditions of Approval (MCoA) A2:

- HumeLink Environmental Impact Statement (EIS) (Transgrid).
- RtS EIS (Transgrid).
- HumeLink Amendment Report (Transgrid).
- HumeLink Aboriginal Cultural Heritage Assessment Report (ACHAR) (August 2022).

#### 2.2. Objectives

The key objective of the HMP is to ensure all MCoA, environmental management measures and licence/permit requirements relevant to construction heritage impacts are described, scheduled, and assigned responsibility as outlined in:

- The HumeLink Approval:
  - HumeLink Infrastructure Approval NSW SSI 36656827.
  - o HumeLink EPBC Approval Cth EPBC 2021/9121.
- Planning Approval Documentation listed in the Minister's Conditions of Approval (MCoA) A2 and as amended.
- Updated environmental Mitigation Measures (UMMs).
- Relevant legislation and other requirements described in Section 3.1 of this Plan.

To achieve this objective, HLWJV will undertake the following:

- Ensure appropriate controls and procedures are implemented during construction activities to address potential Aboriginal and cultural heritage impacts in proximity to the HLW works, as well as manage risks from analysis of relevant construction activities as per MCoA B31, MCoA B32, MCoA B33.
- Ensure appropriate measures are implemented to address the relevant MCoA requirements outlined in Table 3-1, as well as the relevant UMMs, as outlined in Table 3-2.

#### 2.3. Targets

The following targets have been established for the management of potential heritage impacts during the delivery of HLW:

- Ensure compliance with the relevant legislative requirements.
- Ensure compliance with the HumeLink Approvals and Planning Approvals Documentation, where required.
- Effective management of Aboriginal and cultural heritage commitments, in accordance with the relevant heritage guidelines and policies, during construction.
- Implement reasonably practicable measures to minimise impacts on heritage items during construction.







The following performance outcomes relevant to Aboriginal and Cultural Heritage an Historic Heritage (as identified in Chapter 9, Chapter 10 and Chapter 27 'Compilation of performance outcomes' of the EIS/Addendum Report (AR) respectively) are detailed in Table 2-1 below.

Table 2-1 Performance outcomes identified in the EIS relevant to this Plan.

Performance outcomes	How performance will be addressed	Records
Compliance with relevant legislative requirements, MCoAs and UMMs.	Through the implementation of the CEMP, HMP and related management plans	Site records
No unlawful harm to known Aboriginal and known non- Aboriginal heritage.	Number of incidents involving harm to known Aboriginal heritage objects or known non- Aboriginal heritage items.	Incident management records
Effective management of Aboriginal and Historic heritage items and values during construction	plan, procedures, and unexpected finds	Aboriginal and Historic Heritage induction record, toolbox talks
Continued effective stakeholder engagement on heritage items and values.		Stakeholder engagement records



## 3. Environmental requirements

#### 3.1. Legislation

Key legislation and regulatory requirements relevant to Aboriginal and heritage management for the HLW include:

- Environmental Planning and Assessment Act 1979 (EP&A Act).
- Heritage Act 1977
- National Parks and Wildlife Act 1974 (NSW).

Relevant provisions of the above legislation are available in the register of legal and other requirements included in Appendix A1 of the CEMP.

#### 3.1.1. Environmental Planning and Assessment Act 1979 (NSW)

The HumeLink project (HumeLink) is Critical State Significant Infrastructure (CSSI) under section 5.12 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) (SSI #36656827). Accordingly, HumeLink has been subject to assessment and approval issued by the NSW Minister for Planning and Public Spaces under Division 5.2 of the EP&A Act.

Pursuant to Division 5.2, Subdivision 4, Section 5.23(1)(d) of the EP&A Act, Aboriginal Heritage Impact Permits (AHIPs) are not required for approved SSI projects. Impacts to Aboriginal heritage values associated with approved CSSI projects are typically managed under a heritage management sub-plan. This HMP will serve that purpose and be statutorily binding upon HumeLink Approval.

#### 3.1.2. Heritage Act 1977 (NSW)

The Heritage Act 1977 (Heritage Act) provides the legislative framework for the management and protection of the State's heritage. When an interim heritage order or listing on the State Heritage Register applies to a place, building, work, relic, moveable object, precinct, or land, approval must be sought prior to carrying out activities listed in Section 57(1) of the Heritage Act.

In accordance with Section 5.23 of the EP&A Act, an approval under Part 4, or an excavation permit under Section 139, of the Heritage Act is not required for SSI. Therefore, the works do not require approval under the Heritage Act.

#### 3.1.3. National Parks and Wildlife Act 1974 (NSW)

The National Parks and Wildlife Act 1974 (NPW Act), administered by National Parks and Wildlife Service (NPWS), is the primary legislation for the protection of Aboriginal cultural heritage in NSW. The NPW Act gives the NPWS responsibility for the identification, conservation and protection of, and prevention of damage to 'Aboriginal objects' and 'Aboriginal places', defined under the Act as follows:

- An Aboriginal object is any deposit, object or material evidence (that is not a handicraft made for sale) relating to Aboriginal habitation of NSW, before or during the occupation of that area by persons of non-Aboriginal extraction (and includes Aboriginal remains).
- An Aboriginal place is a place declared so by the Minister administering the NPW Act because the place is or was of special significance to Aboriginal culture. It may or may not contain Aboriginal objects.

Part 6 of the NPW Act provides specific protection for Aboriginal objects and places by making it an offence to harm them and includes a 'strict liability offence' for such harm. A 'strict liability offence' does not require someone to know that it is an Aboriginal object or place they are causing harm to in order to be prosecuted. Defences against the 'strict liability offence' in the NPW Act include the carrying out of certain 'Low Impact Activities', prescribed in Clause 80B of the *National Parks and* 





Wildlife Amendment Regulation 2010 (NPW Regulation), and the demonstration of due diligence.

An AHIP issued under Section 90 of the NPW Act is required if impacts to Aboriginal objects and/or places cannot be avoided. An AHIP is a defence to a prosecution for harming Aboriginal objects and places if the harm was authorised by the AHIP and the conditions of that AHIP were not contravened. However, as indicated above, pursuant to Division 5.2, Subdivision 4, Section 5.23(1)(d) of the EP&A Act, AHIPs are not required for approved SSI projects.

#### 3.1.4. Environment Protection and Biodiversity Conservation Act 1999

The Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (the EPBC Act) is the Commonwealth Government's national environmental legislation. It provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities, and heritage places – defined in the EPBC Act as matters of national environmental significance (MNES). To this end, it establishes:

- a. The National Heritage List (NHL) a list of Indigenous, historic and natural places of outstanding significance to the nation, and
- b. The Commonwealth Heritage List (CHL) a list of Indigenous, historic and natural heritage places owned or controlled by the Australian Government.

The EPBC Act also establishes requirements for environmental approval of activities that will have a significant impact on a declared World Heritage property – heritage places of outstanding universal value included in the World Heritage List established by the United Nations Educational, Scientific and Cultural Organization (UNESCO) and recognised under the 1972 World Heritage Convention.

#### 3.1.4.1. Additional relevant legislation

- Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth).
- Native Title Act 1994 (NSW).
- Native Title Act 1993 (Cth).
- Aboriginal Land Rights Act 1983 (NSW).

All legislation relevant to this HMP is included in Appendix A3 of the CEMP.

#### 3.2. Additional approvals, licences, permits and requirements

It should be noted that notification and approval requirements relating to local heritage items under the relevant Local Environmental Plans (LEPs) do not apply to approved CSSI projects.

#### 3.3. Guidelines and standards

The key guidelines, specifications and policy documents relevant to this plan include:

- Code of Practice for Archaeological Investigation of Aboriginal Objects (DECCW, 2010a).
- Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW, 2010b).
- Archaeological Assessment Guidelines (NSW Heritage Office & NSW Department of Urban Affairs and Planning, 1996).
- Aboriginal Procurement Policy (NSW Government, 2021).
- Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (NSW Office of Environment & Heritage, 2011).







- NSW Heritage Manual (NSW Heritage Office 1996).
- Statements of Heritage Impact (Heritage Office & Department of Urban Affairs and Planning 2002).
- Assessing Significance for Historical Archaeological Sites and 'Relics' (Heritage Branch, Department of Planning 2009).
- Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW, 2010c)
- Skeletal Remains: Guidelines for Management of Human Remains (NSW Heritage Office 1998)
- The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance (Australia ICOMOS 2013)
- Assessing heritage significance: Guidelines for assessing places and objects against the Heritage Council of NSW criteria (DPE (NSW Heritage Office) 2023)
- Guidelines for preparing a statement of heritage impact (DPE (NSW Heritage Office) 2023)
- Assessing Significance for Historical Archaeological Sites and 'Relics' (Heritage Branch, Department of Planning 2009)

#### 3.4. Minister's Conditions of Approval

The MCoA relevant to this Plan are listed in Table 3-1 below. A cross reference is also included to indicate where and how the conditions are addressed in this Plan or other HLW management documents.





Table 3-1 MCoA relevant to the HMP

MCoA No.	Condition Requirements	Document Reference
Unsurveyed are	as	
B31	Prior to carrying out any development within the unsurveyed areas of the development area identified in the EIS, untested areas of moderate and high sensitivity, or any potential archaeological deposits (PADs) identified for impact during detailed design, the Proponent must provide an Addendum Aboriginal Cultural Heritage Assessment Report (Addendum ACHAR), prepared in consultation with the Aboriginal stakeholders and Heritage NSW, to the satisfaction of the Planning Secretary. The report must:  (a) include details of consultation with the Aboriginal stakeholders;  (b) describe the additional Aboriginal heritage surveys that were undertaken, including test excavations of PADs;  (c) describe any potential additional impacts to heritage items;  (d) identify further mitigation measures, including avoidance or salvage;  (e) include detailed justification where the final transmission line alignment is not able to avoid impacts to heritage items; and  (f) provide an updated and consolidated list of sites that would be protected and remain in-situ throughout construction and sites that would be salvaged and relocated to suitable alternative locations.	Section 7.4.2
Protection of He	eritage Items	
B32	The Proponent must:  (a) ensure the development does not cause any harm to any Aboriginal heritage objects/sites or historic heritage items located outside the approved construction area (see Table 3-1 and Table 3-3 of Appendix 3);	Section 7.2.2
	(b) manage the sites identified in Table 3-2 of Appendix 3 in accordance with the specified mitigation and management measures and in accordance with the	Table 7-1





MCoA No.	Condition Requirements	Document Reference
	requirements of the Heritage Management Plan, as outlined in condition B33, including any subsequent revision of this plan;	
	(c) implement all reasonable and feasible measures to avoid and minimise harm to historic heritage items within the approved construction area (identified in Table 3-4 of Appendix 3); and	Section 5.2.2
	(d) salvage and relocate items that would be impacted to a suitable location, in accordance with the Heritage Management Plan described in condition B33.	Table 7-1 Annexure B
Heritage Manager	ment Plan	
B33	Prior to carrying out any development (excluding Enabling Works, if the relevant requirements of this condition are adequately addressed in the Enabling Works Management Plan of condition B64) that could harm heritage values, the Proponent must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	This Plan
	(a) be prepared by a suitably qualified and experienced Aboriginal cultural heritage specialist whose appointment has been endorsed by the Planning Secretary;	Section 1.2
	(b) be prepared in consultation with Aboriginal Stakeholders, NPWS and reviewed by Heritage NSW;	Section 4.1 Annexure H
	<ul> <li>(c) undertake an assessment of the unsurveyed areas of the construction areas, in accordance with the Code of practice for archaeological investigation of Aboriginal objects in NSW (DECCW, 2010);</li> </ul>	Section 7.4.2





MCoA No.	Condition Requirements	Document Reference
	<ul><li>(d) include a description of the measures that would be implemented for:</li><li>(i) protecting heritage items in accordance with conditions B32(a);</li></ul>	Section 7.1 Section 7.2.2
	<ul> <li>(ii) undertaking the management activities specified in Table 3-2 of Appendix 3, including a detailed methodology for each of the approved management activities;</li> </ul>	Section 7.4 Annexure B
	(iii) avoiding harm to the heritage items specified in Table 3-1 and Table 3-3 of Appendix 3;	Section 7.1 Section 7.2.2
	<ul> <li>(iv) undertaking detailed reporting on the outcomes of management activities including (but not limited to) archival recording and analysis of stone artefact assemblages and other information relevant to addressing research questions;</li> </ul>	Table 8-2 Annexure B (Section 5) Annexure B (Section 7)
	(v) a strategy for the management of any salvaged Aboriginal objects;	Annexure B (Section 6)
	<ul> <li>(vi) a contingency plan and reporting procedure if:</li> <li>heritage items outside the approved construction area are harmed;</li> <li>previously unidentified heritage items are found; or</li> <li>skeletal material is discovered;</li> </ul>	Section 7.3 Annexure A
	(vii) ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and	Section 7.1





MCoA No.	Condition Requirements	Document Reference
	(viii)ongoing consultation with Aboriginal Stakeholders during the implementation of the plan; and	Section 4.2.1
	<ul><li>(e) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.</li><li>Following the Planning Secretary's approval, the Proponent must implement the Heritage Management Plan.</li></ul>	Section 8.3 Section 8.6
	Note: The Heritage Management Plan must incorporate all relevant aspects of the development, including Enabling Works consistent with the requirements of condition B67.	



## 3.5. Updated Mitigation Measures

UMMs are listed in Table 3-2 below. A cross reference is also included to indicate where and how the conditions are addressed in this Plan or other HLW management documents.

Table 3-2 UMMs relevant to the HMP

UMM No.	Condition Requirements	Document Reference		
Aboriginal Heritag	Aboriginal Heritage			
AH1	The Aboriginal community consultation process for this project will continue until completion of construction.	Section 4		
AH2	The finalisation of the project design and construction methodology, and associated final disturbance areas, will be developed to avoid harm to sites of moderate or above Aboriginal heritage significance as far as practicable. The objective is to further reduce potential impacts through considered placement of transmission line structure locations and design refinement of proposed infrastructure and the associated construction methodology. Avoidance and minimisation of harm to sites and potential archaeological deposits (PADs) will be prioritised.	Section 7.2		



UMM No.	Condition Requirements	Document Reference
АНЗ	Additional assessment will occur in accordance with the Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW (2010a) for areas where ground disturbing activities are required in locations outside of the previously assessed area. Where required, additional heritage surveys will be carried out with the Registered Aboriginal Parties (RAPs) prior to ground disturbing activities occurring in any such areas.  If no Aboriginal objects are found or if Aboriginal objects are found and they would not be impacted, then a letter report will be prepared by an archaeologist that documents the findings and gives clearance to proceed.  Where Aboriginal objects, scarred trees or areas of potential archaeological deposits (PADs) are located in unassessed areas and would be directly impacted, addendum report/s will be prepared.  The report/s will:  detail findings of the survey activities  detail where test excavation is required  detail where test excavation strategies beyond those required  be presented to the RAPs for comment.  Final reports will be provided to RAPs and to Heritage NSW for their information prior to the commencement of ground disturbing activities in these locations.	Section 7.4.2 Table 8-2
AH4	Identified Aboriginal sites of cultural value, will be avoided by the project where feasible. Further consideration of the potential to avoid direct or indirect impacts on the identified Aboriginal sites of cultural value will be carried out during detailed design.	Section 7.2



UMM No.	Condition Requirements	Document Reference
AH5	Where detailed design confirms there would be direct impacts from the construction of transmission line structures, new waterway crossings, worker accommodation facilities and construction compounds in areas with high and moderate archaeological sensitivity that have not been previously subject to test excavations, prior to impact a desktop assessment and site inspection will be completed to determine the level of previous impact from past ground disturbing activities and to determine if the area contains a potential archaeological deposit (PAD). If it is determined that the area contains a PAD and has undergone low previous impact then an archaeological subsurface test excavation program will be carried out in the area of direct impact.	Section 7.4.3
AH6	Following any stripping and grading works and prior to placement of any fill or road base material for construction of the access track, a site walkover will be completed and any surface artefacts will be recorded and moved off of the track. The artefact locations will be recorded as sites and then entered on the AHIMS database. The recording will include a record of their original location. Artefacts may be grouped into sites and the date provided to AHIMS accordingly.	Table 7-2 Annexure B (Section 2) Annexure B (Section 4)
АН7	Following the root ball removal in areas assessed as having high and moderate sensitivity, the area will be inspected and any surface artefacts will be recorded and moved away from the area of impact. The artefact locations will be recorded as sites and then entered on the AHIMS database.	Table 7-2 Annexure B (Section 2) Annexure B (Section 4)





UMM No.	Condition Requirements	Document Reference
АН8	Harm to modified trees and trees of cultural significance will be avoided where possible through design development and construction planning. Modified trees will only be removed to directly facilitate construction of permanent infrastructure and/or to meet Vegetation Clearance Requirements for the transmission line.  If the removal of a scarred tree (a type of modified tree), or a tree of cultural significance, that has been assessed to be an Aboriginal object cannot be avoided, the tree will be subject to 3D scanning.  Prior to any impacts to modified or scarred trees, or a tree of cultural significance, consultation will be undertaken with the Registered Aboriginal Parties (RAPs) on salvaging the scarred tree trunk	Section 7.4.4
АН9	All portions of artefact scatters and isolated finds of moderate or high archaeological significance that will be directly impacted will require surface collection and/or movement prior to construction commencement in those areas.  Where test excavations identify archaeological deposits of moderate or high archaeological significance which cannot be avoided, salvage excavations will occur.	Table 7-1
AH10	The locations of known Aboriginal heritage sites within and adjacent to the project footprint and the relevant protocols to avoid and manage any potential harm to the items will be communicated through the HMP to all relevant construction workers prior to construction commencing in that area.	Section 7.1 Section 8.2
AH11	Cultural heritage awareness training will be carried out for all construction workers working on the project prior to the construction workers participating in construction activities. The training shall cover sites of heritage significance within and adjacent to project work sites and protocols that must be complied with to minimise and manage potential impacts to those sites.	Section 7.1





UMM No.	Condition Requirements	Document Reference
AH12	If at any time during construction, unanticipated Aboriginal objects (which are inconsistent with approved heritage impacts in Technical Report 2 – Revised Aboriginal Cultural Heritage Assessment Report), or human remains are discovered, they will be managed in accordance with an unexpected finds protocol that is aligned with the protocol in Attachment 6 of Technical Report 2 – Revised Aboriginal Cultural Heritage Assessment Report.	Annexure A
AH13	The long-term management of salvaged archaeological materials will be determined in consultation with the Registered Aboriginal Parties (RAPs).	Annexure B (Section 6)
AH14	Sites of heritage significance that would remain in-situ within the transmission line easement, at substation locations and along access tracks will be mapped and recorded within GIS systems managed by Transgrid to reduce the potential for inadvertent impacts which may occur during maintenance activities.	Section 7.2
AH15	If impacts to the Derringullen Creek Women's Site cannot be avoided during further detailed design and construction planning, further consultation with the relevant Registered Aboriginal Party (RAP) will be undertaken to seek guidance around minimising and managing the extent of impacts.	Not applicable to HLW
Non-Aboriginal Heritage		
NAH1	If at any time during construction, any items of potential historic heritage archaeological significance, or human remains are discovered, they will be managed in accordance with an unexpected finds protocol that is aligned with the protocol in <i>Technical Report 3</i> – <i>Historic Heritage Impact Assessment Report</i> .	Annexure A Unexpected Finds Protocol – Heritage





UMM No.	Condition Requirements	Document Reference
NAH2	Additional assessment will occur in areas where ground disturbing activities are required in locations outside of the previously surveyed heritage survey area. Additional heritage surveys will be carried out prior to ground disturbing activities occurring in any such areas (including areas where only visual inspection has been undertaken).  If no historic items are found or if historic items are found and they would not be impacted, then a letter report will be prepared by a heritage that documents the findings and gives clearance to proceed.  Where historic items are located and would be impacted, a report will be prepared for the survey areas. The report(s) will:  • detail findings of the survey activities  • detail where test excavation is required  • outline any additional mitigation strategies beyond those required in Appendix B (Updated mitigation measures) of the Amendment Report.  Final reports will be provided to Heritage NSW for their information prior to the commencement of ground disturbing activities in these locations.	Section 7.5.1 Section 8.6
NAH3	Features/items of heritage significance that would remain in-situ within the transmission line easement and along access tracks will be mapped and recorded within GIS systems managed by Transgrid to reduce the potential for inadvertent impacts to occur during maintenance activities.	Section 7.2



#### 4. Consultation

#### 4.1. Consultation for plan preparation

This HMP was provided to DCCEEW-NSW (Heritage NSW), Heritage Council, Aboriginal Stakeholders and National Parks and Wildlife Service (NPWS) in accordance with MCoA B1(d), for review and comment. Additionally meeting and discussion forums were undertaken to assist in the process of consultation. Records of consultation with these groups, including responses received and how any issues raised were addressed in the development of this Plan are recorded in accordance with the CEMP.

#### 4.1.1. Aboriginal Consultation

The Snowy Mountains and Wagga Wagga region is Country to several groups and many Aboriginal people have cultural and spiritual associations that have long histories embodied in objects which can be seen on the ground and other intangible values related to the past and current concerns and aspirations. The Project area itself is located within the lands of the Wolgalu and Wiradjuri people.

A formal process of Aboriginal community consultation has been conducted as a component of assessment of heritage impacts (as documented in the ACHAR and Addendum ACHAR) in accordance with the guidelines as set out in the NSW OEH's Aboriginal cultural heritage consultation requirements for proponents 2010 (NSW DECCW 2010b).

This HMP was provided to the RAPs for comment and discussion forums were undertaken within the Tumut and Wagga Wagga Local Aboriginal Land Council (LALC) areas.

All RAPs were invited to these discussion forums on the HMP and the management of Aboriginal heritage. Discussion forums were held within the Tumut LALC Area on the 25 July 2024 and 28 November 2024 and within the Wagga Wagga LALC Area on the 1 August 2024 and 28 November 2024.

All attendees, including RAPs, LALC representatives, HLWJV staff and the Project Archaeologist signed up to the meeting and all feedback was recorded.

Note no formal correspondence in relation to this Plan has been received back from the RAPs to date. Documentation was forwarded to all invitees and the information in the HMP was presented at all four sessions. Responses overall were low. Face to face interaction has been more positive, however there was no objections to any of the written materials presented. Discussions revolved around a summary of the Project and methods for inclusion of RAPs and Aboriginal officers. The involvement of the two LALCs has provided an informed intermediary body to liaise with HLWJV and the local RAPs and raise any issues or concerns to the HLWJV. There has been ongoing interaction with the Wagga Wagga and Tumut LALCs in regard to ongoing Aboriginal heritage assessments along the alignment and salvage works in Tarcutta and Wagga Wagga. Ongoing consultation will be undertaken during construction (as detailed in Section 4.2.1) and will provide Aboriginal stakeholders an opportunity to provide feedback on any of the processes and procedures implemented under this Plan. Should the need to update this Plan be identified in response to feedback received as part of the ongoing consultation process, this Plan will be updated in accordance with the process detailed in Section 9.2.

Table 4-1 lists the Registered Aboriginal Parties for the HumeLink West Project.

Table 4-1 Registered Aboriginal Parties

Organisation Name	Name of Contact
Wagga LALC	Tara Charles







Organisation Name	Name of Contact
Wagga Wagga Local Aboriginal Land Council	Lorraine Lyons
Brungle Tumut Local Aboriginal Land Council	Coral Bulger
BTLALC/Ngumbaay	Megan Considine
Bundyi Aboriginal Cultural Knowledge	Mark Saddler
Bidya Marra Consultancy	James Ingram
Individual	Luke Penrith
Warrabinya Cultural Heritage and Assessment Group	Dot Whyman
Ngruum-Bang	Hewitt Whyman
Sandhills Artefacts	Michael Lyons
Yuluug Cultural Programs	Luke Wighton
Individual	Dean Freeman
Individual	Aunty Mary Atkinson
Wagonga Local Aboriginal Land Council	Cheryl Moreton
Individual	Rolly Williams
Individual	Shirley Marlowe
Individual	Marnie Freeman
Individual	Martin Riley (Elder)
Individual	Matthew Marlowe
Individual	Norma Freeman (Elder)
Individual	Priscilla Marlowe
Individual	Krystal Ingram
Individual	Lawrence Marlowe
Individual	Jirrah Freeman
Individual	Keith Freeman (Elder)



Organisation Name	Name of Contact
Individual	Jahnayah Freeman
Individual	Enid Clarke (Elder)
Individual	Braiden Ede
Individual	Alona Apps
BTLALC/Ngumbaay	Megan Considine
BTLALC RAP	Bradley Freeman
BTLALC RAP	Troy Russell
BTLALC RAP	Jeremiah Freeman
BTLALC RAP	Jarrah Bousfield
BTLALC RAP	Nathaniel Jackson
BTLALC RAP	Alex Buckley
BTLALC RAP	Janice Williams
BTLALC RAP	Daniel McPherson
BTLALC RAP	Leanne Williams
BTLALC RAP	Adrian Obrien
BTLALC RAP	Robert Herrington
BTLALC RAP	Nirikai Williams
BTLALC RAP	Jessica Berg
BTLALC RAP	Ebony Freeman
BTLALC RAP	Christopher Thomas
BTLALC RAP	Shanae Freeman
BTLALC RAP	Rayden Kenedy
BTLALC RAP	Tye Crawford
BTLALC RAP	Kajika Berg
BTLALC RAP	Ben Freeman
BTLALC RAP	Jerrawa Freeman
BTLALC RAP	Arinya Freeman





Organisation Name	Name of Contact
BTLALC RAP	Rubin Russell
BTLALC RAP	Kayden Wolfe
Individual	Rodney Penrith

#### 4.1.2. Heritage NSW

This HMP was provided to Heritage NSW on 8 July 2024 for comment. A number of responses have been received from Heritage NSW in relation to European heritage, Aboriginal heritage and marine heritage on 5 August 2024, 22 July 2024 and 17 July 2024 respectively. Further consultation with Heritage NSW in relation to Aboriginal heritage has occurred in relation to the Management and Investigation Methodology in Annexure B. This included reviews by Heritage NSW of the document in September and October 2024 and meetings on the 14 and 18 November to finalise the process prior to a review by the RAPs. A meeting was held with Heritage NSW on 25 February 2025, where the review of maritime databases and inclusion of maritime heritage within the unexpected finds protocol were discussed, these matters have been updated in the relevant sections of this plan.

#### 4.1.3. NPWS

This HMP was provided to NPWS on 8 October 2024 for comment. NPWS responded on 28 October 2024 detailing no further comments associated with the HMP.

#### 4.2. Ongoing consultation

If previously unidentified heritage items/objects are discovered during construction, consultation with the relevant stakeholders and regulators will occur in accordance with the unexpected finds protocol (Annexure A). Where relevant, the outcomes of this consultation will be documented in subsequent revisions of this HMP.

Should the processes described in Section 3.9 to Section 3.12 of the CEMP result in the need for any updates to this Plan that are not considered minor (as determined by the ER in accordance with MCoA A13(c)), consultation of the updated Plan will be undertaken in accordance with MCoA B33(b).

If an incident occurs, including an unexpected find, the Environmental Manager will immediately notify the Environmental Transgrid Representative.

Information supplied to Transgrid's Environmental Representative will include:

- Location (including GPS co-ordinates if available).
- Works being undertaken when the item/object was discovered.
- Actions taken on discovery of the item.

Transgrid will notify DPHI in accordance with MCoA A19 and will submit any subsequent notification in accordance with MCoA A20.

Community feedback and complaints relating to heritage will be managed in accordance with the Community Communication Strategy and Complaints Management System.

#### 4.2.1. Ongoing Aboriginal Consultation

Consultation with the RAPs would be ongoing during the life of the Project for. A log of consultation will be kept by Transgrid (and HLWJV where relevant). Consultation with the Aboriginal stakeholders





will generally be provided in writing via Teambinder or emails (dependent on stakeholder preference) as required. This consultation would include, but not be limited to:

- Consultation in regard to processes and strategies as outlined in this HMP including:
  - During the preparation of Addendum ACHARs prepared prior to carrying out development within the unsurveyed areas identified on the Project Assessment Documentation as per the requirements of MCoA B31 and UMM AH3 (refer to Section 7.4.2).
  - Prior to any impacts to modified or scarred trees, or a tree of cultural significance as per the requirements of UMM AH8 (refer to Section 7.4.4)
  - When determining the long-term management of salvaged archaeological materials as per the requirements of UMM AH13 (Refer to Annexure B)
- Participation in the implementation of certain management and mitigation measures for heritage items including the conduct of test and salvage excavations.
- Ensuring that Aboriginal stakeholders are able to have reasonable access to cultural heritage sites located in HLW designated area. The process to obtain access will entail Aboriginal stakeholders making the request for access to the Transgrid Project manager. Transgrid will then facilitate access construction site with HLWJV. The Aboriginal stakeholders will be taken into the construction site by HLWJV.
- Consultation in the event of any unexpected or undocumented Aboriginal cultural heritage values/objects or burials being found during the construction of HLW.
- Consultation regarding proposed changes to the approved Project is dependent upon the level
  of impact and whether the area was assessed as part of the EIS/AR. The method of
  consultation (i.e. phone call, meeting, provision of report, etc) will be determined on a case
  basis based on the preferences of the relevant stakeholder.
  - Neutral or reduced impact: If as a result of a proposed change a previously identified impact to an Aboriginal heritage item is neutral or reduced then no further consultation is required.
  - Increase impact: If as a result of a proposed change an impact on Aboriginal heritage is considered to be greater than identified by the Approved Project further consultation will be undertaken.





# 5. Existing environment

The following sections summarise what is known about heritage within and adjacent to the HLW. The key reference documents for this HMP are:

- HumeLink EIS (Transgrid).
- HumeLink EIS Technical Report 2 Aboriginal Cultural Heritage Assessment Report (ACHAR) (June 2023).
- HumeLink EIS Technical Report 3 Historic Heritage Impact Assessment (June 2023)
- RtS EIS (Transgrid).
- HumeLink Amendment Report (Transgrid).
- HumeLink AR Technical Report 2 Revised ACHAR (May 2024).
- HumeLink AR Technical Report 3 Historic Heritage Impact Assessment Addendum (May 2024).

During consultation on this Plan with Heritage NSW the topic of maritime heritage was raised. HLWJV have undertaken desktop reviews of the NSW Maritime Heritage Online Database and the Commonwealth Underwater Cultural Heritage Database. No items of maritime or underwater cultural heritage were identified in the vicinity of the Project. Any unexpected maritime heritage finds would be managed in accordance with the unexpected finds protocol for historical heritage items in Section 7.3.

#### 5.1. Aboriginal Heritage

#### **5.1.1. Context**

The EIS describes the Aboriginal occupation of HumeLink through a description of the archaeological evidence that has been identified across the regions, through literature and physical investigations. Chapter 9 of the EIS documents the evidence for a long history of Aboriginal occupation near or within the vicinity of the whole of the length of HumeLink. The EIS summarised the ethnohistory of the Aboriginal people for each of the main regions identified along the length of HumeLink. The below sections, including identified references, are directly from the EIS.

#### Southeastern Highlands

Within the Southeastern Highlands region there are four major language groups, the Wiradjuri (as discussed above) to the west and north-west, the Ngun(n)awal to the centre, the Ngario to the south, and the Gandangara (Gundungurra) to the north-east. Tribal boundaries are based largely on linguistic evidence. It is probable that tribal boundaries, clan estates and band ranges were fluid, varying over time. Consequently, tribal boundaries as delineated today must be regarded as approximations only, and relative to the period of, or immediately before, European contact.

European settlement in the Southeastern Highlands began very soon after invasion of the continent and increased heavily after the 1820s. As a result, recorded information regarding traditional Aboriginal culture is highly fragmentary as much of the local Aboriginal language and lifestyle had changed before it could be recorded.

#### **NSW Southwestern Slopes**

In the eastern end of HumeLink footprint, the Murrumbidgee River would have been a focus of occupation in the region, with the river supporting woodland and forest habitats housing a wide range of resources for the Aboriginal population to support themselves. The frequent floods of the Murrumbidgee River provided Aboriginal people with abundant resources, as pools left by the receding floodwaters would be filled with freshwater mussels, fish, yabbies, and aquatic plants (Kabaila, 1998).





The NSW Southwestern Slopes are home to the Wiradjuri people. The Wiradjuri is the largest Aboriginal group in NSW, known as "the people of three rivers', for the Wambool (the Macquarie River), the Kalari (the Lachlan River) and the Murrumbidjeri (the Murrumbidgee River) bordering their country. In the south of Wiradjuri country three local groups are known, the Murringbulla at Murrumburrah, the Kutamundra at Cootamundra, and the Narrungdera at Narrandera. The HumeLink footprint sits within Narrungdera country. Narrungdera boundaries ran approximately from Ganmain to Ardlethan, west to Mirrool Creek and along the Murrumbidgee River to Darlington Point (Howitt, 1884; Wood, 1992).

Recorded burials and ceremonial sites are rare in the region around Wagga Wagga, though there are several historical accounts of such sites. An 1861 article in *The Argus* reported on the burial of Wiradjuri man "Old Billy" near the racecourse camp at Wagga Wagga. He had died under suspicious circumstances and the chief constable of the Wagga Wagga police had visited the camp to investigate, finding that the body had already been prepared for burial with a grave dug 'a short distance from the camp' (The Argus, 20th November 1861). A local history of Wagga Wagga by J J Baylis notes that the sandhills of Wagga Wagga were known burial grounds for Wiradjuri people (Baylis, 1927).

#### 5.1.2. Previously recorded sites

On 4<sup>th</sup> April 2024 an AHIMS database search was undertaken of the HumeLink footprint to obtain data on the number of known sites within the HLW footprint. There were 170 sites located within the HumeLink area, ranging from stone arrangements, PADs, artefact scatters, modified carved trees / modified trees, open camp sites, and stone quarries. Of the 170 recorded sites, 39 of these were previously recorded by assessments not related to the HumeLink project; the remaining 131 sites were located as part of the survey work completed for the HumeLink project.

#### 5.1.3. Predictive Model

Prior to archaeological fieldwork undertaken to inform the EIS (survey and test excavation), a predictive model was developed, as it was considered possible to predict the types and topographic contexts of sites which may occur within the overall HumeLink project footprint based on the results of previous surveys and analysis of archaeological records in similar landscape contexts.

The predictive model identified artefact scatters to be the most likely site type to occur within the project footprint. Other sites with a moderate to high potential of occurring within the project footprint included isolated finds and modified trees. Isolated finds could occur anywhere in the landscape while modified trees were more likely to occur anywhere mature native trees had been retained, e.g. riparian corridors and isolated shade trees on agricultural land. Other sites, such as burials or ceremonial sites, had a lower potential of occurrence. The predictive model incorporated an assessment of archaeological sensitivity across the project footprint, to assess the potential of the landscape to contain Aboriginal heritage in order to inform potential field survey locations and predict potential sensitivity where the project footprint was not accessible. A preliminary Aboriginal archaeological sensitivity model was developed for the project footprint based on the review of previously recorded AHIMS sites, an assessment of topographic contours and slope, a review of previous archaeological investigations within and near the project footprint and the hydrology along the project footprint. Additionally, land disturbance and land use were also analysed through aerial imagery to redefine the sensitivity map. The sensitivity model was further updated following each component of the archaeological field program (see Sections 5.1.4 and 5.1.5 below) and eventually refined into two models of archaeological sensitivity for the amended project footprint: one for surface sites and one for subsurface sites (see Section 5.1.7 below)

#### 5.1.4. Archaeological field surveys

The archaeological field survey program identified 118 previously unrecorded Aboriginal heritage sites within the overall HumeLink amended project footprint, which comprised:







- 113 artefact scatters and isolated finds
- · Five modified trees.

Ten PADs were also identified in the project footprint.

Open artefact scatters were the most common site type and may occur anywhere that Aboriginal people have travelled, hunted or camped. The survey did not find any burials, quarries or ceremonial sites. A majority of sites recorded during the field surveys were located on gentle slopes (49), followed by streambank (27), crest (25), moderate slopes (16), plain (8), steep slopes (7), ridge (4) and valley flat (2). The slope landform applied to the majority of the project footprint and most artefacts were found in this landform.

A total of 80.5 per cent of the amended project footprint was assessed during the EIS and AR survey, with the remaining area unable to be accessed (refer Annexure E for unsurveyed areas as identified in revised ACHAR). Following the field survey, the archaeological sensitivity model was refined using multiple datasets to characterise the potential landform archaeological sensitivity of the project footprint for surface sites. The model incorporated criteria including field survey results, slope, previously recorded AHIMS site data, and large bodies of permanent water and waterways.

#### 5.1.5. Archaeological test excavation

Archaeological subsurface test excavations were undertaken at five of the PADs identified by the field survey, and in 24 additional areas located across the project footprint (selected to further inform and refine the predictive model). Four PADs and 11 of the additional test locations were confirmed to contain subsurface archaeological material (i.e. confirmed archaeological sites). Archaeological material was not identified in all the areas investigated. Artefact density and distribution also varied across the different sites investigated.

The archaeological sensitivity model underwent a third stage of adjustment and review following the results of the subsurface test excavations. The location of archaeological test pits containing artefacts was reviewed and this data incorporated into the subsurface model. The final version of this model aimed to represent the likely subsurface archaeological sensitivity across the project footprint.

#### 5.1.6. Summary of identified sites

The Aboriginal cultural heritage assessment process for the revised ACHAR determined there were 178 Aboriginal archaeological sites and PADs located within the overall HumeLink project footprint. The majority of the sites were stone artefact occurrences including artefact scatters and isolated finds, as well as PADs and modified trees.

Identified sites and PADs within HLW are listed in Table 5-1and shown in map series A5.3 of the revised ACHAR. The portion of this map series relevant to HLW is appended to this HMP as Annexure C

A significance assessment was undertaken in accordance with the values of the Burra Charter, considering the historic value, scientific (archaeological) value, aesthetic value and the social (cultural) value of a place. Aboriginal cultural significance was assessed through consultation with the RAPs during the archaeological survey and consultation process.

#### **Historic Significance**

No sites of historic significance were identified within the HumeLink project footprint.

#### **Scientific Value**

Archaeological sites recorded during the archaeological survey and previously recorded sites were placed into the following assessment categories:

· potential archaeological deposits





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- · low scientific significance
- moderate (local) scientific significance
- · high (local) scientific significance
- · modified trees identified by RAPs
- sites indicated as destroyed by AHIMS and non-sites.

Low scientific significance has been attributed to 114 sites that have been identified as either highly disturbed (relative to the surrounding landscape) or, have been assessed as having low or low to moderate subsurface archaeological potential. These sites have low numbers of artefacts (less than five) and little potential to provide data that would substantially add to our understanding of Aboriginal occupation and land-use in the local area, beyond the information they have already provided through being discovered and recorded during the revised ACHAR study.

Moderate (local) scientific significance has been attributed to 32 sites that are associated with areas of moderate to high or high potential for subsurface archaeological deposits and rarer site types such as modified trees and charcoal occurrences. Any subsurface deposits at these sites are predicted to contain a higher number of artefacts compared to the other sites in the survey area and, therefore, have potential to provide a large enough sample to enable analyses of assemblage compositions that could be used to derive statements on the technological systems being employed by Aboriginal groups living in this region.

High (local) scientific significance has been attributed to four sites that are associated with areas of very high artefact numbers and high potential for subsurface archaeological deposits. Any subsurface deposits at these sites are predicted to contain a higher number of artefacts compared to the other sites in the survey area and, therefore, have potential to provide a large enough sample to enable analyses of assemblage compositions that could be used to derive statements on the technological systems being employed by Aboriginal groups living in this region.

#### **Aesthetic Value**

No cultural landscape or aesthetic values were identified.

#### Social or cultural value

All Aboriginal sites have significance to Aboriginal people today. No specific site of cultural value was identified as being potentially impacted by the HLW works.

Table 5-1 lists the Aboriginal archaeological and cultural sites identified within the HLW portion of the amended project footprint and potential impact area, as given in the revised ACHAR. The table includes sites outside the potential HLW impact area which require avoidance as specified in Table 3-1 of the MCoA. The full list of Aboriginal archaeological and cultural sites identified in Appendix 3 of the MCoA is provided in Annexure I.





# HumeLink West Heritage Management Sub-Plan

Table 5-1 AHIMS sites within and near the HLW construction footprint, as identified in the Revised ACHAR

AHIMS site ID	Site name	Site type	Significance
56-6-0177	Logbridge creek - 1F-1 - J43	Artefact	Low
56-6-0181	BSF-OS-1	Artefact	Low
56-6-0180	Logbridge Ck-1F-3 - J46	Artefact	Low
56-6-0152	BSF-OS J68	Artefact	Low
56-6-0153	BSF-OS-2 J26	Artefact	Low
56-6-0143	BM-OS-1	Artefact	Low
56-6-0262	BSF-05-46/PAD (J195)	Modified tree/PAD	Moderate
56-6-0263	BSF-05-46 (J193)	Artefact	Low
56-6-0300	LBC-IF-11/PAD (J191)	PAD	Low
56-6-0301	LBC-IF-11 (J190)	Artefact	Low
56-6-0302	LBC-IF-10 (J189)	Artefact	Low
56-6-0273	BSF-IF-34/PAD J174	PAD	Low
56-1-0729	HL-01	Artefact	Moderate
56-1-0730	HL-02	Artefact	Low
56-1-0731	HL-03	Isolated find	Low
56-2-0313	HL-04	Isolated find	Low
56-2-0314	HL-05	Isolated find	Low
56-2-0315	HL-07	Modified tree	Moderate
56-2-0316	HL-08	Isolated find	Low
56-6-0569	HL-09 <sup>1</sup>	Isolated find	Low
56-6-0569	HL-14	Modified tree	Moderate
56-6-0566	HL-15	Modified tree	Moderate
56-2-0312	HL-71	Isolated find	Low

<sup>&</sup>lt;sup>1</sup> HL-09 has is located within close proximity to the HLW construction footprint, however, is located outside the approved construction area. Direct impacts to HL-09 to be avoided in accordance with MCoA B32(a).









AHIMS site ID	Site name	Site type	Significance
56-3-0285	HL-90	Artefact	Low
56-2-0320	HL-95	Isolated find	Low
56-6-0571	HL-97	Artefact	Low
56-6-0570	HL-99	Artefact	Moderate
56-3-0284	HL-100	Artefact	Low
56-6-0567	HL-104	Artefact	Moderate
56-2-0326	HL-107	Artefact	Low
56-6-0584	HL-108	Artefact	Moderate
56-2-0327	HL-111	Artefact	Low
56-2-0325	HL-112	Artefact	Low
56-2-0328	HL-113	Artefact	Low
56-2-0321	HL-122	Artefact	Low
56-2-0322	HL-123	Artefact	Low
56-2-0323	HL-126	Isolated find	Low
56-2-0324	HL-127	Isolated find	Low
56-6-0578	HL-128	Isolated find	Low
56-6-0579	HL-129	Isolated find	Low
56-6-0580	HL-130	Isolated find	Low
56-6-0581	HL-131	Isolated find	Low
56-6-0582	HL-132	Isolated find	Low
56-6-0583	HL-138	Isolated find	Low
56-3-0297	HL-139	Isolated find	Low
56-6-0577	HL-145	Isolated find	Low
56-3-0294	HL-146	Isolated find	Low
56-1-0742	WAS02-01	Artefact	High
56-2-0329	WAS-03	Artefact	Low
	HL-PAD-01	PAD	Moderate to high







AHIMS site ID	Site name	Site type	Significance
			Low in area tested.
	HL-PAD-02	PAD	Moderate in untested area

#### 5.1.7. Areas of archaeological sensitivity

The final modelled archaeological sensitivity of the overall HumeLink project footprint is described in the revised ACHAR (NOHC 2024a). Two models were developed, one for surface sites and one for subsurface sites. Both models incorporated landform, slope gradient, distance to water and stream order, distance to known archaeological sites, and landscape disturbance. The subsurface model also incorporated the results of the test excavation program (i.e. test pits that were found to contain artefacts).

Project impacts within areas of moderate and high surface sensitivity have particular mitigation requirements under the UMMs and CoA. This model will continue to be reviewed and amended throughout the life of the project including review of areas marked as disturbed in the model. The results of the further field assessments and subsurface excavations will be incorporated.

#### 5.2. Non-Aboriginal Heritage

#### **5.2.1. Context**

A full description of the context of historic heritage within the HLW area is provided in the EIS (Chapter 9 and Technical Report 9), the themes of which are associated with pastoralism, communication, land tenure, utilities and transport associated with European exploration and settlement beginning in the 1820s and the development of towns and other settlements throughout the region.

#### 5.2.2. Listed heritage items

There are three listed non-Aboriginal heritage items with curtilages within the HLW footprint, however all items are located outside of the HLW footprint.

The three listed heritage items within the HLW footprint are identified in Table 3-3 of Appendix 3 of the Project Approval and are summarised in Table 5-2 below. The full list of historic heritage items identified in Appendix 3 of the MCoA is provided in Annexure I.

Table 5-2: Non-Aboriginal heritage items near the HLW works

Item name	Location
Ivydale Woolshed	The heritage listed curtilage of this item is partially within the amended project footprint, however the Woolshed is approximately 900 m from the amended project footprint.
Stone Ruin	The heritage listed curtilage of this item is partially within the amended project footprint, however the Stone Ruin itself is approximately 430 m east of the amended project footprint.
Elizabeth Nugent grave on College Creek	The amended project footprint impacts the listed curtilage however the exact location of the historic item (Elizabeth Nugent Grave) is 430 m north-east of the amended project footprint.

The Planning Approval Documentation concluded that there are three historic items within or partially within the HLW footprint (identified in Table 5-2) and that the Project would not impact the significance





of any historic items. In accordance with the requirements of MCoA B32(a), impacts to the non-Aboriginal heritage items identified above will be avoided. Where the HLW footprint intersects with the above areas they will be included in site specific training as set out in Section 8.2.

Non-Aboriginal heritage items identified in Table 3-4 of Appendix 3 of the Project Approval are not within the vicinity of the HLW footprint (refer to Section 1.1 for Project staging) and are therefore not considered further within this document.

The HLW footprint adjoins but does not impact on the following National Heritage listed items:

- Snowy Mountains Scheme.
- Australian Alps National Parks and Reserves area.

#### 5.2.3. Previously unrecorded heritage items

The EIS identified no previously unrecorded heritage items of potential heritage value within the HLW area.

#### 5.2.4. Archaeology

With the implementation of the mitigation measures the potential for unexpected archaeological discovery during construction is considered low and should archaeological items be discovered during construction the unexpected finds protocol in Annexure A will be followed.





# 6. Environmental aspects and impacts

Environmental impacts include impacts to Aboriginal and cultural heritage sites, items and/or objects caused by the proposed construction activities. Details of the proposed activities as well as known and potential impacts, are summarised in the sections below.

#### 6.1. Aspects

What is an environmental aspect. An environmental aspect is an element of an organisation's activities, products, or service that has or may have an impact on the environment.

Key aspects from the HLW that may cause an impact to heritage values are:

- Surface and/or ground disturbance because of vegetation clearing and grubbing.
- Surface and/or ground disturbance because of ground excavation and earthworks
- Surface and/or ground disturbance because of vehicle and plant movement/ or vibration-producing equipment.
- Surface disturbance because of surface water runoff form the active worksites (including laydown areas and construction accommodation camps)

#### 6.2. Impacts

#### 6.2.1. Potential impacts arising from construction activities.

Impacts on Aboriginal/non aboriginal heritage items caused by the construction include:

- Direct disturbance to all surface and/or subsurface features of an item that would generally result in a total loss of heritage value.
- Partial direct disturbance, where there would be direct impacts on only some of the surface and/or subsurface features of an item, generally resulting in partial loss of value.
- Potential direct disturbance (total or partial), where construction takes place adjacent to an item
- Indirect impacts, including impacts on the views to and from heritage items and inadvertent impacts from surface water runoff from sites.
- The following activities my cause impacts to heritage items within the HLW footprint include:
  - Establishing work such as clearing of vegetation.
  - o Construction of transmission line structures (footings/ pads).
  - Construction of the Gugga 500KV substation.
  - Modification of the Bannaby 500kv substation and the Wagga 300KV substation.
  - Construction and upgrades of access tracks (HumeLink West).
  - Establishment of construction camps and construction compounds.





#### 7. Environmental control measures

#### 7.1. Aboriginal and Historic Heritage Induction

All contractors and staff involved in construction activities on site will undergo site induction training (or be supervised by a staff member that has had the relevant training) relating to historic and natural heritage management issues including, where relevant, maritime archaeology. The induction training will address elements related to heritage management including:

- Existence and requirements of this management plan.
- Relevant legislation.
- Roles and responsibilities for historic and natural heritage management.
- Location of identified historic and natural heritage sites and 'No-go Zones'.
- Existence and importance of natural heritage items within HumeLink and how to identify them.
- Proposed historic and natural heritage management and protection measures, including EWMS for heritage survey and salvage.
- Procedure to follow in the event of an unexpected heritage item find or discovery of human remains during construction works.

Specialised breaking ground training (i.e. kick-off training) will be recorded along with more generalised training provided to contractors and staff. Records will be kept and maintained in a register detailing names, dates, content and type of training undertaken. This HMP must be always kept on site and be readily accessible. The requirements of the HMP and the unexpected finds protocols should be incorporated into toolbox talks, and the mapping presented in this report should be reviewed and management measures assessed to ensure that impacts beyond the HumeLink approval are unlikely to take place.

#### 7.2. Identified heritage areas

Where areas have been assessed as part of the EIS and AR reports or as part of any other investigations undertaken during construction, the site-specific management measures identified for these sites will be undertaken. During detailed design Aboriginal and non-Aboriginal items will, where practicable, be avoided. The location of Aboriginal and non-Aboriginal heritage items are recorded in the HLWJV GIS system to ensure awareness of locations to be avoided. Attempts to reduce potential impacts Aboriginal and non-Aboriginal heritage items through considered placement of transmission line structure locations and design refinement of proposed infrastructure and the associated construction methodology will be documented in a design compliance report.

All disturbance areas will be clearly demarcated to ensure that no impacts can occur to Aboriginal and historic heritage sites located outside the area of approved works.

Features/items of heritage significance that would remain in-situ within the transmission line easement, at substation locations and along access tracks will be mapped and recorded within GIS systems managed by Transgrid to reduce the potential for inadvertent impacts to occur during maintenance activities.

Where avoidance is not possible the following onsite control measures will be implemented and reported on.

#### 7.2.1. Permit to clear

The HLW utilises a clearing and land disturbance permit which is completed and signed off prior to clearing or land disturbance. The clearing and land disturbance permit includes a section on heritage





constraints such as the presence of recorded sites and PADs and appropriate management measures (e.g. surface collection, exclusion fencing).

The approval to clear is granted by the Environmental Manager or delegate and is further detailed in the HLW Biodiversity Management Sub-plan.

#### 7.2.2. Exclusion zones

Heritage exclusion zones would be established to protect:

- Aboriginal items
  - o recorded sites that have been identified to remain in-situ.
  - scarred trees that are to remain in-situ and
  - any portions of PADs that becomes a recorded site following subsurface testing and which are identified for no impact.
- Historic and aboriginal heritage items heritage items listed in MCoA Appendix 3 Table 3-1 and Table 3-3 (see Annexure I) located within or near the HLW footprint as identified below:
  - o HL-09 (AHIMS ID: 56-6-0569)
  - Ivydale Woolshed
  - o Stone Ruin
  - Elizabeth Nugent grave on College Creek

#### Exclusion may be achieved by:

- On-site/physical exclusion zone (e.g. fencing, flagging, signage or similar). Where an
  onsite/physical exclusion zone is necessary for Aboriginal features, zones will be
  demarcated by a suitably qualified archaeologist in consultation with RAPs prior to the
  commencement of construction in the relevant location. Exclusion zones may be
  established as a large exclusion zone or as multiple, smaller exclusion zones, depending on
  the nominated site and consultation with RAPs.
- Delineation of the disturbance area (e.g. fencing or star pickets and flagging, etc.) in the vicinity of a particular heritage item or feature located outside of the disturbance area;
- Identification of features/items within GIS systems or other equivalent systems.
- Identification on sensitive area plans.
- Toolbox personnel working in the area regarding the retained features/items and associated controls; and/or.
- Regular environmental inspections, and maintenance of controls as required.

If temporary access to an exclusion area is required, this will be managed as described in Section 7.2.3.

#### 7.2.3. Temporary access to exclusion zones

If access is required into an exclusion/no-go zone, written authorisation must be obtained from the Environment Team. The permit must be signed off by the Environmental Manager or their delegate.

Where access is permissible, the permit will be approved for the applicable activity. Where access is not permissible, the permit will not be approved. Where the sensitive area/site is to be retained following cessation of the activity, the no-go zone will be immediately re-established with delineation reinstalled.

#### 7.3. Unexpected finds

Unexpected finds will be managed in accordance with the Unexpected Finds Procedure – Heritage





Items (Annexure A) that is aligned with the protocol in Attachment 6 of Technical Report 2 – Revised Aboriginal Cultural Heritage Assessment Report and Technical Report 3 – Historic Heritage Impact Assessment Report.

An appropriately qualified archaeologist will be engaged to assess the unexpected find, and the DPC (Heritage NSW), as well as the RAPs, will be consulted during the assessment. If unexpected finds are maritime in nature a qualified maritime archaeologist is to be engaged to assess the find.' Recommencement of works will only be undertaken in accordance with the Unexpected Finds Procedure – Heritage Items (Annexure A) and in consultation with the relevant stakeholder where required.

The NSW Police Force will be notified and engaged immediately upon discovery of suspected human remains. The management of human remains will be undertaken in accordance with the Unexpected Finds Procedure – Heritage Items (Annexure A).

#### 7.3.1. Procedure if heritage items outside the approved construction area are harmed

In the event that heritage items outside of the approved construction area are harmed, the following actions will be implemented:

- 1. Stop work and secure the site
- 2. Report the incident to DPHI and Heritage NSW
- 3. Complete the required incident investigation and reporting procedures in the CEMP (refer to Section 3.8 of the CEMP)
- 4. Implement corrective actions as required by the heritage specialist and Heritage NSW and/or DPHI.

#### 7.4. Aboriginal heritage investigation and management

Where direct impacts to Aboriginal heritage sites (archaeological and cultural) or areas of moderate/high archaeological sensitivity (surface and subsurface models) cannot be avoided during design refinement for HLW, the mitigation measures outlined in this section will be followed in accordance with the UMMs and CoA.

The MCoA specifies the required mitigation activities at each site if impacts cannot be avoided (MCoA, Appendix 3, Table 3-2 (see Annexure I)). The required mitigation activities for proposed impacts may therefore be formulated in accordance with the CoA following completion of detailed design, when the location, nature and scale of ground disturbing activities are confirmed.

Table 7-1 identifies the current mitigation measures required under the UMMs and MCoA for

 Aboriginal archaeological and cultural sites within the HLW project footprint if direct impacts cannot be avoided.

Table 7-2 identifies the current mitigation measures required under the UMMs and MCoA for

- Areas of moderate or high archaeological sensitivity (subsurface model) that have not been previously subject to test excavations within the HLW project footprint if direct impacts cannot be avoided during detailed design, and
- Areas of moderate or high archaeological sensitivity (surface model) that will be subject to impacts from work on access tracks or vegetation clearance which includes root ball removal.

Recommendations as given in Table 7-1 and Table 7-2 are generally dependent on the following factors:

- Confirmation of direct and unavoidable impact during detailed design
- The location of the site/PAD or area of moderate/high sensitivity (surface and subsurface models)







- Whether the site/PAD or area of moderate/high sensitivity (surface and subsurface models) has been subject to previous assessment
- · The nature of the proposed activity
- The assessed archaeological significance or potential of the site/PAD
- The specific requirements of the CoA or UMMs.

Aboriginal heritage investigation and management of areas of concern as identified within the EIS/AR will be managed in accordance with the Project Archaeologist Heritage Management Plan Methodologies as detailed in Annexure B.

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Table 7-1: Mitigation measures under UMMs and CoA for identified sites/PADs within and near the HLW project footprint

AHIMS site ID	Site name	Site type	Significance	Mitigation (if impact cannot be avoided)
56-6-0181	BSF-OS-1	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-6-0180	Logbridge Ck-1F-3 - J46	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-6-0152	BSF-OS J68	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-6-0153	BSF-OS-2 J26	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-6-0143	BM-OS-1	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-6-0262	BSF-05-46/PAD (J195) (previously tested)	Modified tree/PAD	Moderate	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-6-0263	BSF-05-46 (J193)	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-6-0300	LBC-IF-11/PAD (J191) (previously tested)	PAD	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-6-0301	LBC-IF-11 (J190)	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)





				Heritage Management Sub-Plan
AHIMS site ID	Site name	Site type	Significance	Mitigation (if impact cannot be avoided)
56-6-0302	LBC-IF-10 (J189)	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-6-0273	BSF-IF-34/PAD J174 (previously tested)	PAD	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-1-0729	HL-01	Artefact	Moderate	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-1-0730	HL-02	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-1-0731	HL-03	Isolated find	Low	Surface collection (Annexure B, Section 4)
56-2-0313	HL-04	Isolated find	Low	Surface collection (Annexure B, Section 4)
56-2-0314	HL-05	Isolated find	Low	Surface collection (Annexure B, Section 4)
56-2-0315	HL-07	Modified tree	Moderate	3D scanning and additional consultation with RAPs on potentially salvaging the scarred tree trunk (Section 7.4.4)
56-2-0316	HL-08	Isolated find	Low	Surface collection (Annexure B, Section 4)
56-6-0569	HL-14	Modified tree	Moderate	3D scanning and additional consultation with RAPs on potentially salvaging the scarred tree trunk (Section 7.4.4)
56-6-0566	HL-15	Modified tree	Moderate	3D scanning and additional consultation with RAPs on potentially salvaging the scarred tree trunk (Section 7.4.4)
56-2-0312	HL-71	Isolated find	Low	Surface collection (Annexure B, Section 4)





				Heritage Management Sub-Flan
AHIMS site ID	Site name	Site type	Significance	Mitigation (if impact cannot be avoided)
56-3-0285	HL-90	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-2-0320	HL-95	Isolated find	Low	Surface collection (Annexure B, Section 4)
56-6-0571	HL-97	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-6-0570	HL-99	Artefact	Moderate	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-3-0284	HL-100	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-6-0567	HL-104	Artefact	Moderate	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-2-0326	HL-107	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-6-0584	HL-108	Artefact	Moderate	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-2-0327	HL-111	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-2-0325	HL-112	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-2-0328	HL-113	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)





AHIMS site ID	Site name	Site type	Significance	Mitigation (if impact cannot be avoided)
56-2-0321	HL-122	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-2-0322	HL-123	Artefact	Low	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)
56-2-0323	HL-126	Isolated find	Low	Surface collection (Annexure B, Section 4)
56-2-0324	HL-127	Isolated find	Low	Surface collection (Annexure B, Section 4)
56-6-0578	HL-128	Isolated find	Low	Surface collection (Annexure B, Section 4)
56-6-0579	HL-129	Isolated find	Low	Surface collection (Annexure B, Section 4)
56-6-0580	HL-130	Isolated find	Low	Surface collection (Annexure B, Section 4)
56-6-0581	HL-131	Isolated find	Low	Surface collection (Annexure B, Section 4)
56-6-0582	HL-132	Isolated find	Low	Surface collection (Annexure B, Section 4)
56-6-0583	HL-138	Isolated find	Low	Surface collection (Annexure B, Section 4)
56-3-0297	HL-139	Isolated find	Low	Surface collection (Annexure B, Section 4)
56-6-0577	HL-145	Isolated find	Low	Surface collection (Annexure B, Section 4)
56-3-0294	HL-146	Isolated find	Low	Surface collection (Annexure B, Section 4)
56-1-0742	WAS02-01	Artefact	High	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)





AHIMS site ID	Site name	Site type	Significance	Mitigation (if impact cannot be avoided)	
56-2-0329	WAS-03	Isolated find	Low	Surface collection (Annexure B, Section 4)	
	HL-PAD-01 (previously tested)	PAD	Moderate to high	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)	
	HL-PAD-02 (previously tested)	PAD	Low in area tested.	Surface collection (Annexure B, Section 4) and salvage excavation (as required) (Annexure B, Section 3.4)	
	HL-PAD-02 (not previously tested)	PAD	Moderate in untested area	Surface collection (Annexure B, Section 4), test excavation (Annexure B, Section 3.2) and salvage excavation (as required) (Annexure B, Section 3.4)	
Aboriginal Heritage items where impacts are to be avoided in accordance with MCoA B32(a) (listed in MCoA Appendix 3 Table 3-1).  Note: Only items identified in MCoA Appendix 3 Table 3-1 that are relevant to the HLW package of works are listed below					
56-6-0569	HL-09	Isolated find	Low	Direct impacts to be avoided in accordance with MCoA B32(a)	



Table 7-2: Mitigation measures for areas of moderate/high sensitivity (surface and subsurface models) within the HLW project footprint

Assessed Sensitivity	Impact / Activity	Mitigation (if impact is unavoidable)	
Moderate or High (Subsurface Model)	Construction of transmission line structures, new waterway crossings, worker accommodation facilities and construction compounds in areas that have not been previously subject to test excavation	Desktop assessment and site inspection (Section 7.4.3)  If it is determined the area contains a PAD and has undergone low previous impact, test excavation is required (Annexure B, Section 3.2).	
		If test excavation determines the area contains archaeological deposits of moderate or high significance which cannot be avoided, salvage excavation is required (Annexure B, Section 3.4).	
		If the assessment identifies artefact scatters or isolated finds which cannot be avoided, surface collection is required (Annexure B, Section 4)	
Moderate or High (Surface Model)	Impacts from the construction of new or upgraded access tracks	Surface collection (Annexure B, Section 4)	
Moderate or High (Surface Model)	Tree removal that includes the root ball	Surface Collection (Annexure B, Section 4)	



#### 7.4.1. No further archaeological work required

The revised ACHAR attributes low scientific significance to surface sites (artefact scatters or isolated finds) within the project footprint that have been identified as either highly disturbed (relative to the surrounding landscape) or, have been assessed as having low or low to moderate subsurface archaeological potential (NOHC 2024a: Table 9-3). These sites have low numbers of artefacts and little potential to provide data that would substantially add to our understanding of Aboriginal occupation and land-use in the local area, beyond the information they have already provided through being discovered and recorded during works undertaken to inform the EIS. Similarly, where test excavation of PADs or other areas identified a low density of lithic material and indicated that there is a low potential to contain substantial subsurface archaeological deposits within the impacted area, these were assessed as "construction is considered suitable within this location".

Mitigation requirements for such sites (where impacts cannot be avoided) are detailed in the MCoA, and include surface collection (Annexure B, Section 4) and salvage excavation (Annexure B, Section 3.4) where required. The requirement for further archaeological work (i.e. salvage excavation) if impacts are unavoidable would be determined based on the test excavation results, which will be assessed on a site-by-site basis. This is to be determined by the project archaeologist, and in consideration of existing project UMMs for sites of comparable significance/degree of proposed impact.

#### 7.4.2. Unsurveyed areas - Aboriginal heritage

Prior to carrying out any development within the unsurveyed areas of the development area identified in the EIS/AR, untested areas of moderate and high sensitivity, or any potential archaeological deposits (PADs) identified for impact during detailed design additional assessment will be undertaken in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b, referred to further as the 'Code of Practice').

Where required, additional heritage surveys will be carried out with Aboriginal stakeholders. The purpose of these surveys will be:

- To identify and map any new Aboriginal sites and PADs
- To verify the location and extent of existing Aboriginal sites and PADs, where required
- To conduct consultation with the nominated Aboriginal site officers with regard to the mitigation of impact to Aboriginal archaeological values
- To consider ways that potential impacts to significant places can be avoided
- To establish if further archaeological investigations (test and/or salvage excavation and/or surface artefact collection or movement) will be required in order to mitigate the impacts of the proposal

The outcomes of the archaeological survey will be used to determine whether additional management and mitigation measures are required, where this is not already identified in the mitigation measures. Any required mitigation activities would be undertaken in accordance with the following stages of this archaeological methodology. The project archaeologist, taking into account the survey findings and the outcome of consultation with RAPs will determine which of the following mitigation and management activities are required:

- Protective measures where sites will be avoided (Section 7.2.2)
- No further archaeological work required (Section 7.4.1)
- Test excavation (Annexure B, Section 3.2), where it can be demonstrated that sub-surface Aboriginal objects have a high probability of being present (i.e. PAD), and the area cannot be





substantially avoided by the proposed impacts, potentially progressing to salvage excavation (Annexure B, Section 3.4) if required

- Surface artefact collection (Annexure B, Section 4)
- Recording of culturally-modified (scarred) trees that constitute Aboriginal objects (Section 7.4.4)
  with potential for 3D scanning and/or salvage of the trunk if removal of the tree cannot be
  avoided in accordance with UMM AH8.

The outcomes of additional survey would be documented in Addendum ACHARs as required under CoA B31, including identifying appropriate management and mitigation measures for the sites. If Aboriginal archaeological sites or PADs are located in additional survey areas, impacts would be avoided, as far as practicable. If impact avoidance is possible, this should be ensured using the site protection procedures outlined in Section 7.2.2.

For sites or PADs where it is identified that impact from the project is unavoidable, suitable mitigation measures would be determined in accordance with the CoA and UMMs and in consultation with RAPs. These may include the requirement for further salvage actions including test and/or salvage excavation, surface collection/movement, or detailed recording. Any additional mitigation activities would be undertaken in accordance with the archaeological methodologies approved as part of the HMP.

#### 7.4.3. Desktop assessment and site inspection

Desktop assessment and site inspection will be undertaken in areas of high and moderate sensitivity not already subject to test excavation, where detailed design confirms that project activities would have direct impact from:

- Construction of transmission line structures, accommodation facilities and construction compounds, or
- The installation of new creek crossings.

Prior to any ground disturbing activities in these areas, desktop assessment and site inspection will be completed by the project archaeologist to determine the level of previous impact from past ground disturbing activities and to determine if the area contains a PAD. Desktop assessment will be informed by geomorphic assessment, archaeological significance review and any updated archaeological assessment results. Identifying areas of low disturbance/low surface impacts involves consideration of landform/slope gradient, soil type and condition, existing and previous land use disturbance (agriculture, grazing, infrastructure etc)., geomorphic processes including flooding, erosion and colluvial movement, and a determination if the area retains sufficient integrity to have retained subsurface archaeological deposit.

If it is determined that the area contains a PAD and has undergone low previous impact, then an archaeological subsurface test excavation program will be carried out in the area of direct impact. The test excavation program would be undertaken in accordance with the methodology outlined in Annexure B.

#### 7.4.4. Recording of culturally modified (scarred trees)

Four culturally modified (scarred) trees comprising Aboriginal objects have been identified within the HLW project footprint. Additional surveys and site inspections undertaken for the project (Sections 7.4.2 and 7.4.3) may identify additional trees with potential Aboriginal cultural modifications. Validation of their status as Aboriginal objects would be undertaken using the *Aboriginal scarred trees in New South Wales: A field manual* (DEC 2005) guide.

Harm to modified trees (including those of cultural significance) will be avoided where possible through design development and construction planning. Modified trees will only be removed to directly facilitate construction of permanent infrastructure and/or to meet Vegetation Clearance Requirements for the transmission line.







If the removal of a scarred tree (a type of modified tree) or a tree of cultural significance, that has been assessed to be an Aboriginal object cannot be avoided, the tree will be subject to 3D scanning.

Prior to any impacts to modified or scarred trees, or a tree of cultural significance, consultation will be undertaken with the Registered Aboriginal Parties (RAPs) on salvaging the scarred tree trunk. Options for the salvage (removal and retention) of modified trees under a Care Agreement may be explored as part of the management of salvaged/collected Aboriginal objects for the project (Annexure B, Section 6.2) and should be determined in consultation with RAPs

Reports will be provided to RAPs and Heritage NSW. Following this, the scarred trunk will be salvaged.

#### 7.5. Non-Aboriginal heritage investigation and management

#### 7.5.1. Field Surveys

Field survey is required for areas where ground disturbing activities are required in locations outside of the previously surveyed area. The existing survey methodology used during preparation of the HHIA and HHIA Addendum will be employed for any additional surveys, in order to provide a consistent approach for field survey activities.

The outcomes of additional survey would be documented in assessment reports as required (Section 8.6), including identifying appropriate management and mitigation measures. If historical heritage items are located in additional survey areas, impacts would be avoided, as far as practicable. If impact avoidance is possible, this should be ensured using the site protection procedures outlined in Section 7.2.

For historical heritage items where it is identified that impact from the project is unavoidable, suitable mitigation measures would be determined in accordance with the CoA and UMMs and in consultation with DPHI and Heritage NSW as required. These may include the requirement for salvage actions including test and/or salvage excavation, surface collection/movement, or detailed recording/archival photographic recording.





# 8. Compliance Management

Compliance of the HLW with this HMP will be measured against the targets outlined in Section 2.3. of this Plan. Through ongoing monitoring throughout the construction of the HLW.

#### 8.1. Roles and responsibilities

The HLWJV Team's organisational structure and overall roles and responsibilities are outlined in Section 3.5 of the CEMP.

HLWJV will ensure all of its employees, contractors and subcontractors and agents are made aware of and comply with this HMP.

HLWJV will appoint a suitably qualified and experienced Environment Manager who is responsible for overseeing the activities related to this management plan and the project CEMP.

HLWJV will appoint a suitably qualified and experienced Archaeologist (Project Archaeologist) who is responsible for overseeing, for and on behalf of the Proponent, the archaeological activities relating to the project.

#### 8.2. Training

Personnel who carry out works with the potential to impact sites, including employees, contractors and utility staff, will undergo site induction training relating to Aboriginal and Cultural heritage management issues prior to construction activities commencing. The induction training will address elements related to Aboriginal and Cultural heritage management including:

- Relevant legislation and guidelines.
- The requirements of this Plan.
- The relevant management and mitigation measures.
- Making the personnel working on site aware of and explaining the procedures to follow in the
  event of any unexpected heritage find or the discovery of human remains during construction
  works (refer to Annexure A).
- Outline responsibilities and obligations under the NPW Act relating to Aboriginal and Cultural heritage management.

Further details regarding staff induction and training are outlined in Section 3.5 of the CEMP.

#### 8.3. Monitoring and inspection

Monitoring and inspection requirements are outlined in Table 8-1. Additional requirements and responsibilities in relation to inspections are documented in Sections 3.9.1 and 3.9.2 of the CEMP.





Table 8-1 Monitoring and inspection

Monitoring details	Location	Frequency	Responsibility	Records
Daily visual inspections	Inspection of site heritage mitigation measures (where required) at work sites.	Daily (where required)	Superintendent	Site Diary
Weekly visual inspection	Inspection of the environmental controls and implementation of the heritage mitigation measures.	Prior to commencing works in areas where exclusion zones have been established (refer Section 7.2.2)  Weekly	Environmental Advisor	Weekly Environmental Inspection Checklist
Unsurveyed areas	Prior to works in unsurveyed areas	As required	Project Archaeologist	Reporting as detailed in Table 8-2





#### 8.4. Auditing

Audits (both internal and external) will be undertaken to assess the effectiveness of environmental controls, compliance with this sub plan, MCoA and other relevant approvals, licences and guidelines.

Audit requirements are detailed in Section 3.9.3 of the CEMP.

#### 8.5. Incidents and non-compliances

All incidents will be managed in accordance with Section 3.8 of the CEMP.

All non-compliances will be managed in accordance with Section 3.10 of the CEMP.

Reporting requirements and responsibilities for incidents and non-compliances are documented in Section 3.9.4 of the CEMP.

#### 8.6. Reporting

Reporting for the project will be undertaken in accordance with the CoA and UMMs, and the best practice guidelines, standards and policy documents referenced in Section 3.3 of this HMP. A summary of the heritage reporting requirements for the HLW project is provided in Table 8-2.

In addition to the heritage reporting requirements provided in Table 8-2, environmental inspection checklists, incidents and non-compliances will be captured in the UGL-EMS incident management software program (Synergy) to manage, record and report against targets. These records will be reviewed by the Environmental Manager and will be submitted to Transgrid when requested.

HLWJV will make the relevant documents pertaining to the environmental requirements of the Project, including this plan, available to Transgrid to publish on the Project Website, to be publicly available in accordance with MCoA C15.





# HumeLink West Heritage Management Sub-Plan

Table 8-2: Heritage Reporting Requirements

Reference	Report	Responsibility	Summary	Timing	Recipients			
Aboriginal Heritage								
MCoA B31 UMM AH3	Addendum	Project Archaeologist Environmental Manager	HLWJV will provide an Addendum Aboriginal Cultural Heritage Assessment Report (Addendum ACHAR), prepared in consultation with the Aboriginal stakeholders and Heritage NSW, to the satisfaction of the Planning Secretary. The report will:  Include details of consultation with the Aboriginal stakeholders;  Describe the additional Aboriginal heritage surveys that were undertaken,  Including test excavations of pads; describe any potential additional impacts to heritage items;  Identify further mitigation measures, including avoidance or salvage;  Include detailed justification where the final transmission line alignment is not able to avoid impacts to heritage items; and  Provide an updated and consolidated list of sites that would be protected and remain in- situ throughout construction and sites that would be salvaged and relocated to suitable alternative locations.	Prior to carrying out any development within the unsurveyed areas of the development area identified in the EIS/AR, untested areas of moderate and high sensitivity, or any potential archaeological deposits (PADs) identified for impact during detailed design	Transgrid Aboriginal stakeholders Heritage NSW DPHI ER			







#### **HumeLink West**

Reference	Report	Responsibility	Summary	Timing	Recipients
MCoA B33(e)	Aboriginal Cultural Heritage Excavation Report	Project Archaeologist Environmental Manager	<ul> <li>The Aboriginal Cultural Heritage Excavation Report will be prepared as detailed in Annexure B (Section 7):</li> <li>Describe the methods and results of the excavation program</li> <li>Detail the results of the analysis of recovered Aboriginal objects</li> <li>Provide an assessment of significance of identified sites.</li> <li>Detail the long-term management of Aboriginal objects</li> <li>Include a statement of compliance with approval conditions and management and mitigation measures, and</li> <li>Confirm that Aboriginal Site Impact Recording Forms have been completed and submitted to the Heritage NSW AHIMS Registrar.</li> </ul>	Provided within 12 months from the completion of materials analysis	Transgrid Aboriginal stakeholders Heritage NSW DPHI ER



#### **HumeLink West**

Reference	Report	Responsibility	Summary	Timing	Recipients		
Non- Abori	Ion- Aboriginal Heritage						
UMM NAH2	Survey Reports	Project Archaeologist Environmental Manager	Findings of additional field surveys undertaken outside of previously surveyed areas.  If no historic items are found or if historic items are found but they would not be impacted, a letter report will be prepared by a heritage specialist that documents the findings of the additional survey and gives clearance to proceed.  Where historic items are located and would be impacted, a report will be prepared for the survey area/s. The report/s will:  Detail findings of the survey activities  Detail where test excavation is required  Outline any additional mitigation strategies beyond those required.	Prior to the commencement of ground disturbing activities in these locations.	Heritage NSW ER		



# 9. Review and improvement

#### 9.1. Continuous improvement

As outlined in Section 3.12.1 of the CEMP, management reviews will be undertaken annually as part of the continual improvement process. The reviews will be initiated by the Environmental Manager and include relevant HLW team members and stakeholders. Continuous improvement of this plan and of monitoring requirements detailed in Section 8.3 of this Plan will be achieved by the ongoing evaluation of environmental management performance against planning approval requirements, environmental policies, objectives, and targets for the purpose of identifying opportunities for improvement.

The continuous improvement process will be designed to:

- Identify areas of opportunity for improvement of environmental management and performance
- Determine the cause or causes of non-compliances and deficiencies.
- Develop and implement a plan of corrective and preventative action to address any noncompliances and deficiencies.
- Verify the effectiveness of the corrective and preventative actions.
- Document any changes in procedures resulting from process improvement.
- Make comparisons with objectives and targets outlined in Section 2.2 and Section 2.3 of this Plan.

#### 9.2. Plan update and amendment

The processes described in Section 3.9 to Section 3.12 of the CEMP may result in the need to update or revise this Plan.

Any revisions to this plan will be in accordance with the process outlined in Section 3.12 of the CEMP.

A copy of the updated plan and changes will be distributed to all relevant stakeholders in accordance with the approved document control procedure – refer to Section 3.12 of the CEMP.



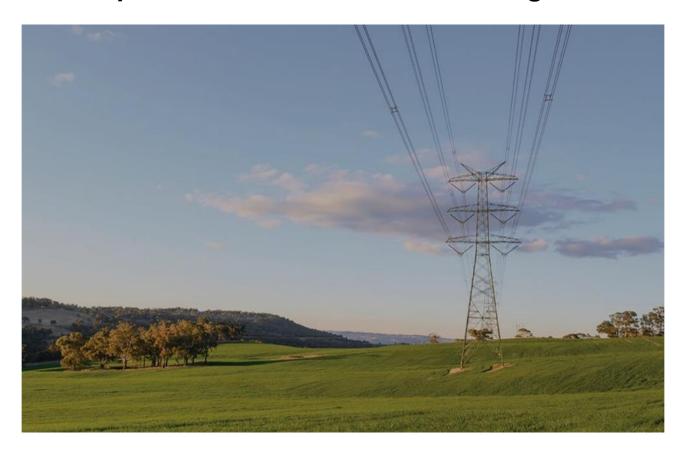


# **Annexure A.** Unexpected Finds Protocol – Heritage



Revision History					
Revision No	Date	Revision Detail/Status	Author	Reviewer	Approver
А	16/01/2024	Draft	lan Irwin		Jim Maniord
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R3	03/06/2025	Address ER comments	Emily Fuda	Chris Millar	Tim Burns

# HumeLink West Unexpected Finds Procedure – Heritage Items



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## **ACRONYMS AND ABBREVIATIONS**

Abbreviation	Explanation
Archaeologist	Suitably qualified heritage archaeologist
AR  Aboriginal representative – This may be a representative from the Aboriginal Land Council, a Registered Aboriginal Party, a nominated elder agreed person or group as determined as part of the planning approval. also be an agreed representative from the contractor.	
BCD	Biodiversity, Conservation and Science Directorate
CEMP	Construction Environmental Management Plan
Cth Commonwealth	
DCCEEW - NSW	Department of Climate Change, Energy, the Environment and Water (NSW) (formerly DPE)
DPE	Department of Planning and Environment (formerly DPIE)
DPHI <sup>1</sup>	Department of Planning, Housing and Infrastructure (formerly DPE)
ER	Environmental Representative
NPWS	National Parks and Wildlife Service
PEM	Project Environmental Manager
PM	Project Manager
WS Works Supervisor - Construction	





#### 1 PURPOSE

This procedure has been developed to provide a consistent method for managing unexpected heritage items (both Aboriginal and non-Aboriginal) that are discovered during construction activities. This procedure includes notification obligations under the *Heritage Act 1977* (NSW), *National Parks and Wildlife Act 1974* (NSW), *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* (Cth), *Environmental Protection and Biodiversity Act 1999* (Cth) and the *Coroner's Act 2009* (NSW).

The following guidelines and policies were referenced during the drafting of the Procedure:

- Assessing heritage significance (NSW Heritage Office, 2001)
- Photographic recording of heritage items using film or digital capture (NSW Heritage Office, 2006)
- Skeletal remains: Guidelines for management of human skeletal remains (NSW Heritage Office, 1988)
- Due diligence code of practice for the protection of Aboriginal objects in NSW (OEH, 2010)
- Aboriginal cultural heritage consultation requirement for proponents (OEH, 2010)
- Code of practice for the archaeological investigation of Aboriginal objects in NSW (OEH, 2010)
- Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW (OEH, 2011)

#### 2 SCOPE

Despite appropriate and adequate investigation, unexpected heritage items may still be discovered during investigative, and construction works. When this happens, this procedure must be followed. This procedure provides direction on when to stop work, where to seek technical advice and how to notify the regulator, if required.

This procedure applies to <u>all</u> construction and Investigative activities and must be followed by staff and subcontractors at all times.

This procedure applies to:

• The discovery of any unexpected heritage item during construction of HumeLink West, where approval to disturb the item or where safeguards for managing the disturbance (apart from this procedure) are not contained within the Project Approval (SSI-36656827) or the Heritage Management Plan prepared by HLWJV as per Minster's Conditions of Approval (MCoA) B33.

This procedure does not apply to:

- The legal discovery and disturbance of heritage items as a result of investigations (or other
  activities) that are required to be carried out for the purpose of complying with the requirements
  of the Project Approval (SSI-36656827).
- The legal discovery and disturbance of heritage items as a result of construction related activities, where the disturbance is permissible in accordance with the Project Approval including any relevant MCoAs or Updated Mitigation Measures (UMMs).





#### 3 TYPES OF UNEXPECTED HERITAGE ITEMS

The roles of project, field and environmental staff are critical to the early identification and protection of unexpected heritage items. **Attachment 1** illustrates the wide range of heritage discoveries found on projects and provides a useful photographic guide. Subsequent confirmation of heritage discoveries must then be identified and assessed by technical specialists (usually an archaeologist).

An 'unexpected heritage item' means any unanticipated discovery of an actual or potential heritage item, for which approval to disturb<sup>1</sup> has not been granted or does not have a safeguard in place (apart from this procedure) to manage the disturbance.

For the purpose of this procedure, these discoveries are categorised as either:

- (a) Aboriginal objects: may include stone tool artefacts, shell middens, axe grinding grooves, pigment or engraved rock art, burials and scarred trees.
- (b) Historic (non-Aboriginal) heritage items may include:
  - Relic: items such as bottles, utensils, remnants of clothing, crockery, personal effects, tools, machinery and domestic or industrial refuse
  - Work: culverts, historic road formations, historic pavements, buried roads, retaining walls, tramlines, cisterns, fences, sheds, buildings and conduits.
- (c) Human skeletal remains.

The relevant legislation that applies to each of these categories is described below.

#### 3.1 Aboriginal Objects

The National Park and Wildlife Act 1974 protects Aboriginal objects which are defined 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"<sup>2</sup>.

Examples of Aboriginal objects include stone tool artefacts, shell middens, axe grinding grooves, pigment or engraved rock art, burials and scarred trees.

#### All Aboriginal objects, regardless of significance, are protected under law

When a person becomes aware of an Aboriginal object, they must notify Heritage NSW. Assistance on how to do this is provided in Section 6 (Step 5).

#### 3.2 Historic Heritage Items

Historic (non-Aboriginal) heritage items may include:

- (a) Archaeological 'relics'
- (b) Other historic items (i.e. works, structures, buildings or movable objects).

#### 3.2.1 Archaeological 'Relics'



<sup>&</sup>lt;sup>1</sup> Disturbance is considered to be any physical interference with the item that results in it being destroyed, defaced, damaged, harmed, impacted or altered in any way (this includes as a result of archaeological investigation activities)

<sup>&</sup>lt;sup>2</sup> Section 5(1) of the *National Parks and Wildlife Act 1974* (NSW)



The Heritage Act 1977 (NSW) protects relics which are defined 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"<sup>3</sup>.

Relics are archaeological items of local or state significance which may relate to past domestic, industrial or agricultural activities in NSW, and can include bottles, remnants of clothing, pottery, building materials maritime heritage such as bridges and jetties and general refuse.

#### All relics are subject to statutory controls and protection

when a person discovers a relic they must notify the NSW Heritage Council of its location<sup>4</sup>. Advice on how to do this is provided in Section 6 (Step 5). Approval is required from Heritage NSW before any State Significant relics are removed.

#### 3.2.2 Other Historic Items

Some historic heritage items are not considered to be 'relics'; but are instead referred to as works, buildings, structures or movable objects. Examples of these items that may be encountered include culverts, historic road formations, historic pavements, buried roads, retaining walls, tramlines, cisterns, fences, sheds, buildings and conduits. Unexpected discovery of these items must be managed in accordance with this procedure.

As a general rule, an archaeological relic requires discovery or examination through the act of excavation. In contrast, 'other historic items' either existing above the ground's surface (e.g. a shed), or they are designed to operate and exist beneath the ground's surface (e.g. a culvert).

Despite this difference, it should be remembered that relics can often be associated with 'other heritage items', such as archaeological deposits within cisterns and underfloor deposits under buildings.

#### 3.3 Human Skeletal Remains

Human skeletal remains can be classed as:

- (a) Reportable deaths.
- (b) Aboriginal objects.
- (c) Relics.

Where it is suspected that less than 100 years has elapsed since death, human skeletal remains come under the jurisdiction of the *State Coroner and the Coroners Act 2009* (NSW). Under s 35(2) of the Act, a person must report the death to a police officer, a coroner or an assistant coroner as soon as possible. This applies to all human remains less than 100 years old<sup>5</sup> regardless of ancestry. Public health controls may also apply.

Where remains are suspected of being more than 100 years old, they are considered to be either Aboriginal objects or non-Aboriginal relics depending on the ancestry of the individual. Aboriginal human remains are protected under the *National Parks and Wildlife Act 1974* (NSW), while non-Aboriginal remains are protected under the *Heritage Act 1977* (NSW).

The discovery of Aboriginal human remains also triggers notification requirements to the Commonwealth Minister for the Environment under s 20(1) of the *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* (Cth).

<sup>&</sup>lt;sup>5</sup> Under section 19 of the *Coroners Act 2009* (NSW), the coroner has no jurisdiction to conduct an inquest into reportable death unless it appears to the coroner that (or that there is reasonable cause to suspect that) the death or suspected death occurred within the last 100 years



<sup>&</sup>lt;sup>3</sup> Section 4(1) *Heritage Act 1977* (NSW)



# All skeletal remains are subject to statutory controls and protection

All bones must be treated as potential human skeletal remains and work around them must stop while they are protected and investigated urgently.

Guidance on what to do when suspected human remains are found is detailed in Attachment 5.





# 4 PROCEDURE OVERVIEW

On discovering something that could be an unexpected heritage item ('the item'), the following procedure must be followed. There are eight steps in the procedure. These steps are summarised in Figure 4-1 below and explained in detail in Section 5.





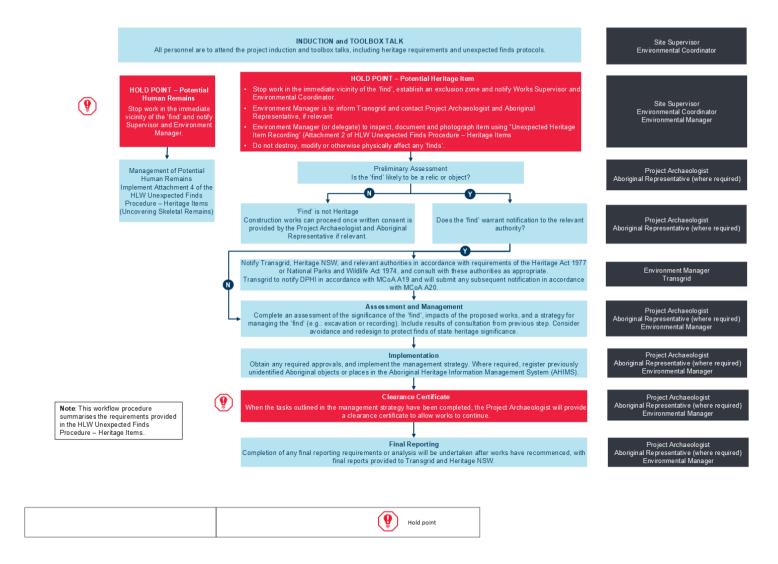


Figure 4-1 Overview of steps to be undertaken on the discovery of an unexpected heritage item.





# 5 UNEXPECTED HERITAGE ITEMS PROCEDURE

Table 5-1 sets out the process to follow in the event of an unexpected find. The responsibility column relates to the responsible party(ies). The responsible party may delegate these roles to other suitably qualified individuals, however responsibility for ensuring the procedural steps are followed is as designated within Table 5-1.

Project Manager (PM); Works Supervisor (WS), Project Environmental Manager (PEM) Archaeologist (Arc), Aboriginal Representative (AR)

Table 5-1 Specific tasks to be implemented following the discovery of an unexpected heritage item.

Step	Task	Responsibility	Guidance and Tools			
1	Stop work, protect item, and inform environment staff					
1.1	Stop all work in the immediate area of the item and notify the Project Manager or Works Supervisor.	Attachment 1 (Identifying Unexpected Heritage items)				
1.2	Establish a 'no-go zone' around the item. Use high visibility fencing, where practical.	PM or WS				
1.3	Inform all site personnel about the no-go zone. No further interference, including works, ground disturbance, touching or moving the item must occur within the no-go zone.					
1.4	Inspect, document and photograph the item using 'Unexpected Heritage Item Recording (Attachment 2)		Attachment 2 (Unexpected Heritage Item Recording Form)  Attachment 3 (Photographing Unexpected Heritage items)			
1.5	Is the item likely to be bone?  Yes: Follow the steps in Attachment 4 – 'Uncovering bones'. Where it is obvious that the bones are human remains, you must notify the local police by telephone immediately.  No: proceed to next step	PM or WS	Attachment 4 (Uncovering Skeletal Remains)			
1.6	Is the item likely to be:	PM or WS and PEM	Attachment 1 (Identifying Unexpected Heritage items)			





Step	Task	Responsibility	Guidance and Tools
	(a) A relic? (A relic is evidence of past human activity which has local or state heritage significance. It may include items such as bottles, utensils, remnants of clothing, crockery, personal effects, tools, machinery and domestic or industrial refuse)		
	and/or		
	(b) An Aboriginal object? (An Aboriginal object may include a shell midden, stone tools, rock art or a scarred tree).		
	Yes: proceed directly to Step 1.8		
	No: proceed to next step		
	Is the item likely to be a "work", building or standing structure? (This may include tram tracks, kerbing, historic road pavement, fences, sheds or building foundations).		
1.7	<b>Yes:</b> can works avoid further disturbance to the item? (E.g. if historic road base/foundation or footing have been exposed, can they be left in place?) If <b>yes</b> , works may proceed without further disturbance to the item. Complete Step 1.8 within 24 hours.	PM or WS and PEM	Attachment 1 (Identifying Unexpected Heritage items)
	<b>No:</b> works cannot avoid further disturbance to the item, works must not recommence at this time. Complete the remaining steps in this procedure		
1.8	Inform Transgrid and Environmental Representative (ER) of item by providing them with the completed <b>Attachment 2</b> (Unexpected Heritage Item Recording Form)	PM or WS and PEM	Attachment 2 (Unexpected Heritage Item Recording Form)
	In consultation with proponent/client determine if an approval, permit or appropriate safeguard is in place to allow for the impact of the item.		
1.9	Yes: Works can proceed with no further requirements to follow this procedure.		
	No: proceed to next step		
2	Contact/engage an archaeologist and, where required, Aboriginal repres	entative(s)	





Step	Task	Responsibility	Guidance and Tools		
	Contact the Project (on-call) Archaeologist to discuss the location and extent of the item and to arrange a site inspection, if required. The project CEMP may contain contact details of the Project Archaeologist.				
2.1	Or	PM or WS and PEM	<b>Section 6:</b> Advice, Contacts and Notification		
	Where there is no project archaeologist engaged for the works, engage a suitably qualified and experienced archaeological consultant to assess the find. If the unexpected find is maritime in nature, a qualified maritime archaeologist is to be engaged to assess the find.				
2.2	Where the item is likely to be an Aboriginal object, arrange for an Aboriginal representative to assess the find. Generally, an Aboriginal representative would be from the relevant local Aboriginal land council. If an alternative contact person (ie a RAP) has been nominated as a result of previous consultation, then that person is to be contacted.	PM or WS and PEM			
2.3	If requested, provide photographs of the item taken at Step 1.4 to the archaeologist, and Aboriginal representative if relevant.	PM or WS and PEM	Attachment 3 (Photographing Unexpected Heritage items)		
3	Preliminary assessment and recording of the find				
3.1	If the archaeologist (and Aboriginal representative, if relevant) determine from the photographs that no site inspection is required because no archaeological constraint exists for the project (eg the item is not a 'relic', a 'heritage item' or an 'Aboriginal object'). Any such advice should be provided in writing (eg via email) to the Project Environmental Manager and confirmed by the Project Manager or Works Supervisor.  Proceed to Step 8 on receipt of the written clearance by the archaeologist (and Aboriginal	PM or WS and PEM / AR / Arc			
	representative, if relevant)  In the event that the archaeologist or the Aboriginal representative do not give written advice that the item is not an Aboriginal Object then proceed to the next step				
3.2	Arrange site access for the archaeologist (and Aboriginal representative, if relevant) to inspect the item as soon as practicable. In the majority of cases a site inspection is required to conduct a preliminary assessment.				





Step	Task	Responsibility	Guidance and Tools	
3.3	Subject to the archaeologist's assessment (and the Aboriginal representative's assessment, if relevant), work may recommence at a set distance from the item. This is to protect any other archaeological material that may exist in the vicinity, which has not yet been uncovered. Existing protective fencing established in Step 1.2 may need to be adjusted to reflect the extent of the newly assessed protective area. No works are to take place within this area once established.  Toolbox training for all staff working in the area will be required prior to commencement of works	PM or WS and PEM / AR / Arc		
3.4	The archaeologist (and Aboriginal representative, if relevant) may provide advice after the site inspection and preliminary assessment that no archaeological constraint exists for the project (eg the item is not a 'relic', a 'heritage item' or an 'Aboriginal object'). Any such advice should be provided in writing (eg via email) to the Project Environmental Manager and confirmed by the Project Manager or Works Supervisor.  Proceed to Step 8 on receipt of the written clearance by the archaeologist (and Aboriginal representative, if relevant)			
3.5	Where the item has been identified as a 'relic', 'heritage item' or an 'Aboriginal object' the archaeologist should formally record the item.	Arc		
3.6	The regulator can be notified informally by telephone at this stage by the archaeologist, Project Manager (or delegate) or Works Supervisor or Project Environmental Manager. Any verbal conversations with regulators must be noted on the project file for future reference.			
4	Prepare an archaeological or heritage management plan	<u> </u>		
4.1	The archaeologist must prepare an archaeological or heritage management plan (with input from the Aboriginal representative, where relevant) shortly after the site inspection. This plan is a brief overview of the following:		Attachment 5 (Archaeological Heritage Advice Checklist)	





Step	Task	Responsibility	Guidance and Tools
	(a) description of the feature including if the find is of greater than expected density and/or significance,		
	(b) historic context, if data is easily accessible,		
	(c) likely significance,		
	(d) heritage approval and regulatory notification requirements,		
	(e) heritage reporting requirements,		
	(f) stakeholder consultation requirements,		
	(g) relevance to other project approvals and management plans etc.		
4.2	In preparing the plan, the archaeologist with the assistance of the Project Environmental Manager must review the CEMP, any heritage sub-plans, any conditions of heritage approvals, conditions of project approval (and or Minister's Conditions of Approval) and heritage assessment documentation (eg Aboriginal Cultural Heritage Assessment Report). This will outline if the unexpected item is consistent with previous heritage/project approval(s) and/or previously agreed management strategies. The Project Manager and Project Environmental Manager must provide all relevant documents to the archaeologist to assist with this. Discussions should occur with design engineers to consider if re-design options exist and are appropriate.	PM or WS and PEM / Arc	Attachment 5 (Archaeological Heritage Advice Checklist)
4.3	The archaeologist must submit this plan as a letter, brief report or email to the Project Manager outlining all relevant archaeological or heritage issues. This plan should be submitted to the Project Manager as soon as practicable. Given that the archaeological management plan is an overview of all the necessary requirements (and the urgency of the situation), it should take no longer than two working days to submit to the Project Manager.	Arc	
4.4	The Project Manager or Works Supervisor and the Project Environmental Manager must review the archaeological or heritage management plan to ensure all requirements can reasonably be implemented. Seek additional advice from the Project Environmental Manager, if required.	PM or WS and PEM /	





Step	Task	Responsibility	Guidance and Tools		
5	Notify the Regulator				
5.1	Review the archaeological or heritage management plan to confirm if regulator notification is required. Is notification required?  Yes: Proceed to the next step  No: Proceed to Step 6	PM or WS and PEM			
5.2	If notification is required, complete the template notification letter.  PM or WS and PEM  Attachment 6 ( Letter – Template)				
5.3	Forward the draft notification letter, archaeological or heritage management plan and the site recording form to proponent/client for review and consider any suggested amendments.				
	The process for submission of the notification letter, including the archaeological management plan and the completed site recording, will be as directed by the proponent/client.				
5.4	This process may involve the proponent/client submitting the relevant documentation to the relevant regulator(s). In this case the documentation must be formally submitted to the client/proponent to allow for their submission.		Section 6: Advice, Contacts and Notification		
	A list of the relevant regulators that the documentation requires submission too, must be included within the correspondence to the proponent/client.				
	<b>Note:</b> For SSD or SSI Projects under Part 5 of the EP&A Act, the Department of Planning, Housing and Infrastructure (DPHI) must also be notified.				
5.5	A copy of the final signed notification letter, archaeological or heritage management plan and the site recording form should be kept on file by the Project Environmental Manager.	PEM			
6	Implement archaeological or heritage management plan				
6.1	Modify the archaeological or heritage management plan to take into account any additional advice resulting from notification and discussions with the regulator.	PEM / Arc			





Step	Task	Responsibility	Guidance and Tools		
6.2	Implement the archaeological or heritage management plan. Where impact is expected, this may include such things as a formal assessment of significance and heritage impact assessment, preparation of excavation or recording methodologies, consultation with Aboriginal representative and Registered Aboriginal Parties, obtaining heritage approvals etc.	PM or WS and PEM / Arc / AR			
6.4	For Part 5 projects, assess whether heritage impact is consistent with the project approval or if project approval modification is required from the DPHI.	PM or WS and PEM			
6.5	Where statutory approvals (or project approval modification) are required, impact upon relics and/or Aboriginal objects must not occur until heritage approvals are issued by the appropriate regulator(s).  PM or WS and PEM				
6.6	Where statutory approval (Part 5 project modification) is not required and where recording is recommended by the archaeologist, sufficient time must be allowed for this to occur.	, , , , , , , , , , , , , , , , , , , ,			
6.7	Ensure short term and permanent storage locations are identified for archaeological material or other heritage material if removed from site, where required. Interested third parties (eg museums or local councils) should be consulted on this issue.  Check contractual requirements associated with the management handling and storage of heritage items. If items are released to the proponent/client, ensure that a chain of custody form is issued with the items and that the signed chain of custody is retained on file within the Project folder.	PM or WS and PEM			
7	Review CEMPs and Approval Conditions				
7.1	Check whether written notification is required to be sent to the regulator before recommencing work. Where this is not explicit in heritage approval conditions, expectations should be clarified directly with the regulator.	PEM			
7.2	Update the CEMP, site mapping and project delivery program as appropriate with any project changes resulting from final heritage management (eg retention of heritage item, salvage of item). Updated CEMPs must incorporate additional conditions arising from any	PM or WS and PEM			





Step	Task	Responsibility	Guidance and Tools	
	heritage approvals, and Aboriginal community consultation if relevant. Include any changes to CEMP in site induction material and update site workers during toolbox talks.			
8	Resume Work			
8.1	Seek written clearance to resume project work from regional environment staff and the archaeologist (and regulator, if required). Clearance would only be given once all archaeological excavation and/or heritage recommendations (where required) are complete. Resumption of project work must be in accordance with all the relevant project/heritage approvals/determinations.	PM or WS and PEM		
8.2	If required, ensure archaeological excavation/heritage reporting and other heritage approval conditions are completed in the required timeframes. This includes artefact retention repositories, conservation and/or disposal strategies.	PM or WS and PEM		
8.3	If additional unexpected items are discovered this procedure must begin again from Step 1.	PM or WS and PEM		



# 6 ADVICE, CONTACTS AND NOTIFICATION

Any member of the Project team may raise a non-conformance or improvement opportunity. Environmental non-conformances might include:

# Heritage Regulators and Project Contacts (amend appropriately)

# **Project-Specific Contacts**

Position	Name	Phone Number
Project Manager	Sherif Mansour	+61459936310
Works Supervisor	Subbie to include details	
Project Environment Manager		
Aboriginal Representative		
Project Archaeologist	Nicola Hayes	+61421274470
Local Police Station		+612 6922 2599
Environment Line		131 555





# ATTACHMENT 1. IDENTIFYING UNEXPECTED HERITAGE ITEMS

The following images can be used to assist in the preliminary identification of potential unexpected items (both Aboriginal and non-Aboriginal) during construction and maintenance works. Please note this is not a comprehensive typology.



**Top left hand picture continuing clockwise:** Stock camp remnants (Hume Highway Bypass at Tarcutta); Linear archaeological feature with post holes (Hume Highway Duplication), Animal bones (Hume Highway Bypass at Woomargama); Cut wooden stake; Glass jars, bottles, spoon and fork recovered from refuse pit associated with a Newcastle Hotel (Pacific Highway, Adamstown Heights, Newcastle area).







**Top left hand picture continuing clockwise:** Woodstave water pipe with tar and wire sealing (Horsley Drive); Tram tracks (Sydney); Brick lined cistern (Clyde); Retaining wall (Great Western Highway, Leura).







**Top left hand picture continuing clockwise:** Road pavement (Great Western Highway, Lawson); Sandstone kerbing and guttering (Parramatta Road, Mays Hill); Telford road (sandstone road base, Great Western Highway, Leura); Ceramic conduit and sandstone culvert headwall (Blue Mountains, NSW); Corduroy road (timber road base, Entrance Road, Wamberai).







**Top left hand corner continuing clockwise:** Alignment Pin (Great Western Highway, Wentworth Falls); Survey tree (MR7, Albury); Survey tree (Kidman Way, Darlington Point, Murrumbidgee); Survey tree (Cobb Highway, Deniliquin); Milestone (Great Western Highway, Kingswood, Penrith); Alignment Stone (near Guntawong Road, Riverstone). Please note survey marks may have additional statutory protection under the *Surveying and Spatial Information Act* 2002.













**Top left hand corner continuing clockwise:** Remnant bridge piers (Putty Road, Bulga); Wooden boundary fence (Campbelltown Road, Denham Court); Dairy shed (Ballina); Golden Arrow Mine Shaft.







**Top left hand corner:** Culturally modified stone discovered on Main Road 92, about two kilometres west of Sassafras. The remaining images show a selection of stone artefacts retrieved from test and salvage archaeological excavations during the Hume Highway Duplication and Bypass projects from 2006-2010.





# ATTACHMENT 2. UNEXPECTED HERITAGE ITEM RECORDING FORM

Unexpected heritage item recoding form						
Date and Time						
Recorded by	Name:					
	Position:					
Project Name:						
Background						
Description of works being undertaken (e.g. topsoil, stripping, cut to fill works, service relocation, etc)						
Description of exact location of item (include GPS coordinates or if using ArcGIS Field Maps drop a pin at the location and name and date the find and record the pin details opposite)						
Description of item f	ound (What typ	e of ite	m is it likely to be? Tick the relevant box)			
A. A relic			A 'relic' is evidence of a past human activity relating to the settlement of NSW with local or state heritage significance. A relic might include bottles, utensils, plates, cups, household items, tools, implements, and similar items.			
B. A work, building	ng or structure		A 'work' can generally be defined as a form infrastructure such as a culvert, footings or foundations road base, a bridge pier, and similar items.			
C. An Aboriginal	object		An 'Aboriginal object' may include stone tools, stone flakes, shell middens, rock art, scarred trees and human bones.			
D. Bone			Bones can either be human or animal remains.  Remember that you must contact the local police immediately by telephone if you are certain that the bone(s) are human remains.			
E. Other						
Provide a short desc	cription of the i	tem				





Sketch: (Provide a sketch of the items general location in relation to other features such as roads,	, creeks, tress, etc)
Photographs: (Record the number and names of photographs and storage location. Were possible ensured is switch on when taking photographs with your phone).	ire that georeferencing
Action taken (Tick either A or B)	
A. Unexpected item would not be further impacted on if works continue	
Describe how works would avoid impact on the item.	
B. Unexpected item would be further impacted on if works continue	
Describe how works would impact on the item.	
Project Manager / works supervisor	
Name Signature	





#### ATTACHMENT 3. PHOTOGRAPHING UNEXPECTED HERITAGE ITEMS

Photographs of unexpected items in their current context (*in situ*) may assist heritage staff and archaeologists to better identify the heritage values of the item. Emailing good quality photographs to specialists can allow for better quality and faster heritage advice. The key elements that must be captured in photographs of the item include its position, the item itself and any distinguishing features. All photographs must have a scale (ruler, scale bar, mobile phone, coin) and a note describing the direction of the photograph.

### Context and detailed photographs

It is important to take a general photograph (Figure 1) to convey the location and setting of the item. This will add much value to the subsequent detailed photographs also required (Figure 2).





Figure 2: Close up detail of the sandstone surface showing material type, formation and construction detail. This is essential for establishing date of the feature.

Figure 1: Telford road uncovered on the Great Western Highway (Leura) in 2008.

#### Photographing distinguishing features

Where unexpected items have a distinguishing feature, close up detailed photographs must be taken of this, where practicable. In the case of a building or bridge, this may include diagnostic details architectural or technical features. See Figures 3 and 4 for examples.



Figure 3: Ceramic bottle artefact with stamp.



**Figure 4:** Detail of the stamp allows '*Tooth & Co Limited*' to be made out. This is helpful to a specialist in gauging the artefact's origin, manufacturing date and likely significance.

#### Photographing bones

Most bones found on site will be those of recently deceased animal bones often requiring no further assessment (unless they are in archaeological context). However, if bones are human, the police must be contacted immediately (see **Section 6** for detailed guidance). Taking quality photographs of the bones can often resolve this issue quickly. Environmental staff can





generally confirm if bones are human or non-human with appropriate photographs.

Ensure that photographs of bones are not concealed by foliage (Figure 5) as this makes it difficult to identify. Minor hand removal of foliage can be undertaken if disturbance of the bone does not occur. Excavation of the ground to remove bone(s) should **not** occur, nor should they be pulled out of the ground if partially exposed.

Where sediment (adhering to a bone found on the ground surface) conceals portions of a bone (Figure 6) ensure the photograph is taken of the bone (if any) that is not concealed by sediment.



Figure 5: Bone concealed by foliage.



Figure 6: Bone covered in sediment

Ensure that all close-up photographs include the whole bone and then specific details of the bone (especially the ends of long bones, the *epiphysis*, which is critical for species identification). Figures 7 and 8 are examples of good photographs of bones that can easily be identified from the photograph alone. They show sufficient detail of the complete bone and the epiphysis.



Figure 7: Photograph showing complete bone.



Figure 8: Close up of a long bone's epiphysis.





#### ATTACHMENT 4. UNCOVERING SKELETAL REMAINS

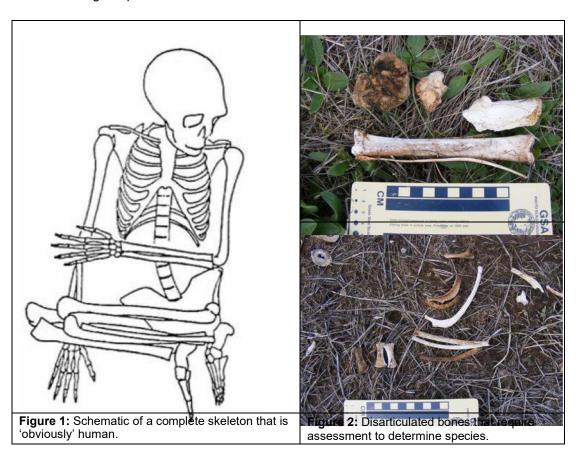
This **Attachment** is to provide managers with:

- 1) Advice on what to do when bones are discovered.
- 2) Guidance on the notification pathway.
- 3) Additional considerations and requirements when managing the discovery of human remains.

#### 1. First uncovering bones

Stop all work in the vicinity of the find. All bones uncovered during project works should be **treated** with care and urgency as they have the potential to be human remains. Therefore, they must be identified as either human or non-human as soon as possible by a qualified forensic or physical anthropologist.

On the very rare occasion where it is instantly obvious from the remains that they are human, the Project Manager (or a delegate) **must inform the police by telephone** prior to seeking specialist advice. It will be obvious that it is human skeletal remains where there is no doubt, as demonstrated by the example in Figure 1. Often skeletal elements in isolation (such as a skull) can also clearly be identified as human. Note it may also be obvious that human remains have been uncovered when soft tissue and clothing are present.



This preliminary phone call is to let the police know that a specialist skeletal assessment to determine the approximate date of death which will inform legal jurisdiction. The police may wish to take control of the site at this stage. If not, a forensic or physical anthropologist must be requested to make an on-site assessment of the skeletal remains.

Where it is not 'obvious' that the bones are human (illustrated by Figure 2), specialist assessment is required to establish the species of the bones. Photographs of the bones can assist this assessment if they are clear and taken in accordance with guidance provided in **Attachment 3**. Good photographs often result in the bones being identified by a specialist without requiring a site visit; noting they are





nearly always non-human. In these cases, non-human skeletal remains must be treated like any other unexpected archaeological find.

If the bones are identified as human (either by photographs or an on-site inspection) a technical specialist must determine the likely ancestry (Aboriginal or non-Aboriginal) and burial context (archaeological or forensic). This assessment is required to identify the legal regulator of the human remains so **urgent notification** (as below) can occur. Preliminary telephone or verbal notification by the Project Manager or regional environment staff is considered appropriate. This must be followed up later by the formal letter notification as per **Attachment 6** when a management plan has been developed and agreed to by the relevant parties.

#### 2. Range of human skeletal notification pathways

The following is a summary of the different notification pathways required for human skeletal remains depending on the preliminary skeletal assessment of ancestry and burial context.

A. Human bones are from a recently deceased person (less than 100 years old).

#### **Action**

A police officer must be notified immediately as per the obligations to report a death or suspected death under s35 of the Coroners Act 2009 (NSW). It should be assumed the police will then take command of the site until otherwise directed.

B. Human bones are archaeological in nature (more than 100 years old) and are likely to be Aboriginal remains.

#### Action

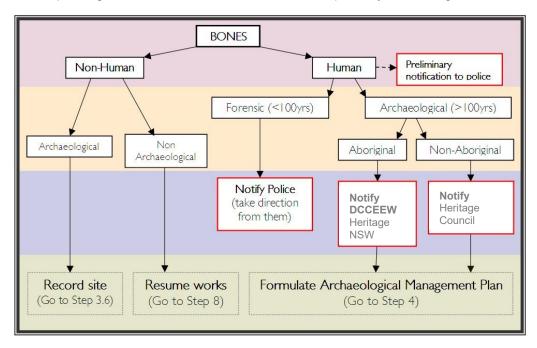
Heritage NSW and Proponent/Client must be notified immediately. As directed by the Proponent/Client the relevant Aboriginal community stakeholders must be notified and may request to be present on site.

C. Human bones are archaeological in nature (more than 100 years old) and likely to be non-Aboriginal remains.

#### **Action**

Heritage NSW must be notified immediately

The simple diagram below summarises the notification pathways on finding bones.







After the appropriate verbal notifications (as described in B and C), the Project Manager must proceed through the Unexpected Heritage Items Procedure to formulate an archaeological management plan (Step 4). Note no archaeological management plan is required for forensic cases (A), as all future management is a police matter.

Non-human skeletal remains must be treated like any other unexpected archaeological find and so must proceed to recording the find as per Step 3.6.

#### 3. Additional considerations and requirements

Uncovering archaeological human remains must be managed intensively and needs to consider several additional specific issues. These issues might include facilitating culturally appropriate processes when dealing with Aboriginal remains (such as repatriation and cultural ceremonies). Transgrids ACHA can provide advice on this and how to engage with the relevant Aboriginal community. Project Managers, more generally, may also need to consider overnight site security of any exposed remains and may need to manage the onsite attendance of several different external stakeholders during assessment and/or investigation of remains. Project Managers may also be advised to liaise with local church/religious groups and the media to manage community issues arising from the find. Additional investigations may be required to identify living descendants, particularly if the remains are to be removed and relocated.

If exhumation of the remains (from a formal burial or a vault) is required, Project Managers should also be aware of additional approval requirements under the *Public Health Act 1991* (NSW). Specifically, it is required to apply to the Director General of NSW Department of Health for approval to exhume human remains as per Clause 26 of the Public Health (Disposal of Bodies) Regulation 2002 (NSW). Further, the exhumation of such remains needs to consider health risks such as infectious disease control, exhumation procedures and reburial approval and registration. Further guidance on this matter can be found at the NSW Department of Health website.

In addition, due to the potential significant statutory and common law controls and prohibitions associated with interfering with a public cemetery, project teams are advised, when works uncover human remains adjacent to cemeteries, to confirm the cemetery's exact boundaries.





# ATTACHMENT 5. ARCHAEOLOGICAL HERTIAGE ADVICE CHECKLIST

The following checklist can be used by the Project Manager and the archaeologist to ensure all relevant archaeological issues are considered when developing the management plan required at Step 4 of this procedure.

An archaeological or heritage management plan can include a range of activities and processes, which differ depending on the find and its significance.

Action	Required	Outcomes Notes
Assessment and Investigation		
Assessment of significance	Yes/No	
Assessment of heritage impact	Yes/No	
Archaeological excavation	Yes/No	
Archival photographic recording	Yes/No	
Heritage approvals and notifications		
AHIPs, Section 140, S139 exceptions etc	Yes/No	
Regulator relics/objects notification	Yes/No	
S170 Heritage and Conservation Register listing requirements ( <b>Note</b> only required for government organisations)	Yes/No	
Compliance with CEMP or other project heritage approvals	Yes/No	
Stakeholder consultation		
Aboriginal stakeholder consultation requirements and how it relates Aboriginal Cultural Heritage Consultation Requirements for Proponents (NPWS)	Yes/No	
Advice from Aboriginal representatives y.	Yes/No	
Artefact/heritage item management		
<ul> <li>Retention or conservation strategy (eg items may be subject to long conservation and interpretation)</li> <li>Disposal strategy</li> <li>Short term and permanent storage locations (interested third parties should be consulted on this issue).</li> </ul>	Yes/No	
Control Agreement for Aboriginal objects.	Yes/No	





#### ATTACHMENT 6. NOTIFICATION LETTER - TEMPLATE

"[Select and type date]"
[Select and type reference
number] [Select and type file
number]

[Insert recipient's name and address from Section 6,

[Select and type salutation and name],

#### Re: Unexpected heritage item discovered during [Select and type project name].

I write to inform you of an unexpected [select relic, heritage item or Aboriginal object] found during construction works at [insert location] on [insert date]. [When the regulator has been informally notified at an earlier date by telephone, this should be referred to here].

This letter is in accordance with the notification requirement under [select Section 146 of the *Heritage Act 1977* (NSW) or Section 89(A) of the *National Parks and Wildlife Act 1974* (NSW) – Refer to Section 5, Step 5].

**NB:** On finding Aboriginal human skeletal remains this letter must also be sent to the commonwealth minister for Sustainability, Environment, Water, Populations and Communities (SEWPC) in accordance with notification requirements under Section 20(1) of the *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* (Cth).

[Provide a brief overview of the project background and project area. Provide a summary of the description and location of the item, including a map and image where possible. Also include how the project was assessed under the *Environmental Planning and Assessment Act 1979* (NSW) (eg Part 5). Also include any project approval number, if available].

[Contractor's name] has sought professional archaeological advice regarding the item. A preliminary assessment indicates [provide a summary description and likely significance of the item]. Please find additional information on the site recording form attached.

Resulting from these preliminary findings, [Contractor's name] is proposing [provide a summary of the proposed archaeological/heritage approach (eg develop archaeological research design (where relevant), seek heritage approvals, undertake archaeological investigation or conservation/interpretation strategy). Also include preliminary justification of such heritage impact regarding project design constraints and delivery program].

The proposed approach will be further developed in consultation with a nominated [Insert regulators office (Heritage NSW)] staff member.

Please contact me if you have any input on this approach or if you require any further information.

Yours sincerely

[Sender name and position]

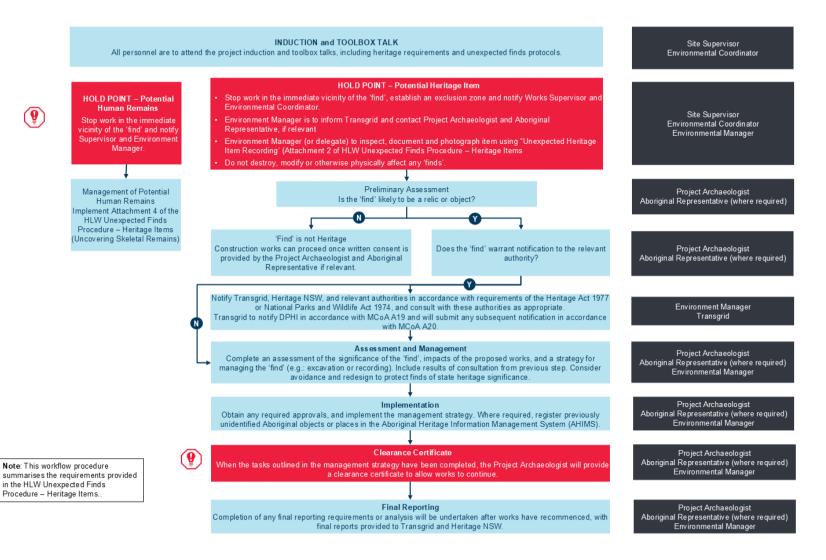
[Attach the archaeological/heritage management plan and site recording form].



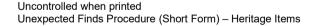




# Unexpected Finds Procedure (Short Form Guide) - Heritage Items









#### **Unexpected Finds Procedure (Short Form Guide) – Heritage Items**

# **Unexpected Human Skeletal Remains**

If any human remains or suspected human remains are discovered during any works, all activity in the area must cease immediately. The following plan describes the actions that must be taken in instances where human remains, or suspected human remains are discovered. Any such discovery at the activity area must follow these steps.

# Discovery:

- If any human remains or suspected human remains are found during any activity, works in the vicinity must cease and the Project Manager must be contacted immediately.
- The remains must be left in place and protected from harm or damage. To protect the remains until their origins can be determined high visibility markers or temporary fencing which will not cause ground disturbance must be immediately placed a minimum of 10 m around the location of the human remains or suspected human remains by site personnel. A minimum no work buffer zone radius of 50 m must be implemented around the remains by taping off the area as an environmental sensitive zone.
- All personnel should then leave the fenced off area immediately.
- The Environmental Officer is responsible to ensure that these temporary measures are implemented onsite within 24 hours of identification.

#### Notification:

- The NSW Police must be notified immediately. Details of the location and nature of the human remains must be provided to the relevant authorities.
- If there are reasonable grounds to believe that the remains are Aboriginal, the following must also occur:
- Heritage NSW must be contacted as soon as practicable, and you must provide any available details of the remains and their location. Heritage NSW Environment Line can be contacted on 131 555.
- The relevant Aboriginal community groups must be notified immediately when the remains are confirmed to be Aboriginal, as advised by Heritage NSW.
- The relevant Project Archaeologist may be contacted to facilitate communication between the police, Heritage NSW and Aboriginal community groups.

#### Process:

- If the remains are considered to be Aboriginal by the Police and Heritage NSW no work can recommence at the particular location unless authorised in writing by Heritage NSW
- Recording of Aboriginal ancestral remains must be undertaken by, or be conducted under the direct supervision of, a specialist physical anthropologist or other suitably qualified person.
- Archaeological reporting of Aboriginal ancestral remains must be undertaken by, or reviewed by, a
  specialist physical anthropologist or other suitably qualified person, with the intent of using
  respectful and appropriate language and treating the ancestral remains as the remains of Aboriginal
  people rather than as scientific specimens.
- If the remains are considered to be Aboriginal by the Police and Heritage NSW, an appropriate management and mitigation, or salvage strategy will be implemented following further consultation with the Aboriginal community and Heritage NSW.





# **Annexure B.** Investigation and Management Methodologies





# Heritage Investigation & Management Methodologies

Navin Officer Heritage Consultants

December 2024

# 1 Requirement for Test Excavations

Where detailed design confirms there would be direct impacts from the construction of transmission line structures, new waterway crossings, worker accommodation facilities and construction compounds in areas with high and moderate archaeological sensitivity that have not been previously subject to test excavations, prior to impact a desktop assessment and site inspection will be completed to determine the level of previous impact from past ground disturbing activities and to determine if the area contains a potential archaeological deposit (PAD). If it is determined that the area contains a PAD and has undergone low previous impact then an archaeological subsurface test excavation program will be carried out in the area of direct impact as detailed in Section 3 below.

A potential archaeological deposit, or PAD, is defined as any location where the potential for subsurface archaeological material is considered to be of moderate or high archaeological sensitivity, as predicted by the landform archaeological sensitivity model relative to the surrounding study area landscape. The potential for subsurface material to be present is assessed using criteria developed from the results of previous surveys and excavations undertaken as part of the ACHA. These criteria include:

- Areas of low disturbance. This has excluded sealed and gravelled tracks and roads, railway lines, dams, waterways, and farm dams.
- Landscapes that have accumulated soil deposits (i.e. not on bedrock outcrops)
- Where it is likely that Aboriginal people may have camped close to water and food resources, i.e. within 400 metres of perennial water sources and on level to gentler slopes.

For further detail on the archaeological sensitivity model see Section 4.2.4 to 4.2.7 within the ACHA.

Areas of moderate and high archaeological sensitivity that will be the subject of direct project impact will be assessed for the presence of PAD using the criteria listed above. The boundaries of PADs will be defined by the extent of particular micro-landforms known to have high correlations with archaeological material such as: predominantly low to moderately inclined low spurs above creeks/valley flats/flood plains.

A PAD may or may not be associated with surface artefacts. Where one or more surface artefacts occur on a sedimentary deposit, a PAD may also be identified where there is insufficient evidence to assess the nature and content of the underlying deposit. This situation is due mostly to poor ground surface visibility.



# 2 Requirement for Surface Collection

A site walkover will be completed and any surface artefacts will be recorded and moved away from the area of impact:

- Following any stripping and grading works and prior to placement of any fill or road base material for construction of the access track in areas of high and moderate sensitivity not already tested, and
- Following the root ball removal in areas assessed as having high and moderate sensitivity not already tested

Other archaeological surface objects may also be identified for surface artefact collection post approval during additional archaeological field survey and test/salvage excavations for the project. Further consultation with RAPs will confirm in these instances where movement of surface artefacts to outside of the proposed impact area is required as a management or mitigation measure.

If surface artefacts are found the surface collection methodology will be used, refer to Section 4. If a larger than expected concentration of artefacts are found (greater than 10 artefacts per m²) during field survey and/or monitoring following grading and where there is a noted soil deposit, i.e. more than 10 cm, then the test excavation method may be triggered, (refer to Section 3.2) subject to an assessment of prior disturbance and or the potential for in-situ archaeological material at that location. If PAD cannot be avoided, then the 'Creek crossings and PADs' test excavation method will be used, refer to Section 3.2.

# 3 Proposed Methodology for Subsurface Test Excavation

#### 3.1 Study Aims

An archaeological subsurface testing program will be undertaken in consultation with the RAPs. The aim is to ascertain the nature and extent of archaeological deposits within PADs that are to be directly impacted by the location of new access tracks, new creek crossings, accommodation facilities and construction compounds. The methodology has been designed to test the density, horizontal and vertical, of substantial archaeological deposits. The methodology will not conclusively prove or disprove that Aboriginal objects are present or absent from the wider area of large landscape-based PADs. We recognise in some cases for these large landform PADs that the testing may not reduce the size of the PAD outside the area of testing. The locations of such test pits will be determined in the field based on an infield appreciation of the possible extent of the PAD.

#### 3.2 Test Excavation Methodology

#### Transmission line tower locations:

The test excavation will be undertaken in two stages of testing (see Figure 7).

#### Stage 1

Within PADs impacted by tower locations 5 pits will be placed within each proposed tower location (Figure 8). This is aimed to test the approximate location of the highest impact within each tower location, ie the four tower legs and the centre point.



Following an on-site review, the test pit locations may be varied slightly in order to avoid hazards and obstructions including the following:

- large stone cobbles or tors;
- outcropping bedrock;
- highly disturbed or eroded ground including rabbit burrows, ants nests, buried infrastructure such as pipes or cables; and/or
- substantial vegetation.

#### Stage 2

If no artefacts are identified during the first phase of testing, additional pits may be placed within the tower location, to test the absence of cultural material. Pits will be placed between each phase 1 pit, up to 4 additional pits will be competed (Figure 1).

If substantial or significant deposits are identified during the test excavation program this will indicate the need for the relocation of a tower or for a future mitigation program which might include salvage.

#### Accommodation Facilities and construction compounds:

Within PADs impacted by Accommodation Facilities and construction compounds, a line (transect) of pits will be placed within the area of impacts. The exact location of any test transect will depend on the PAD location and the impact location. A cross transect may be placed to ensure the length and width of the impact area is tested. Pits will be placed a maximum of 10 metres apart. Pits will be excavated until bedrock or archaeologically sterile layers are encountered.

Following an on-site review, the test pit locations may be varied slightly in order to avoid hazards and obstructions including the following:

- large stone cobbles or tors;
- outcropping bedrock;
- highly disturbed or eroded ground including rabbit burrows, ants nests, buried infrastructure such as pipes or cables; and/or
- substantial vegetation.

If substantial or significant deposits are identified during the test excavation program this will indicate the need for accommodation facilities or construction compounds to be relocated or redesigned, or for a future mitigation program which might include salvage.

Excavation procedures and protocols may be modified at the discretion of the archaeologist in consultation with the RAPs and client as the conditions in the field and nature of the excavations develop in order to properly characterise the nature of the archaeological deposit. This may include a provision for additional transects and/or transect extensions according to an archaeological appreciation of the results from the initial pits.



#### PADs on new access tracks and creek crossings:

Within PADs impacted by new access tracks and creek crossings, a line (transect) of pits will be placed along the proposed crossing/track alignment, in the PAD or on either side of the creek. Pits will be placed a maximum of 10 metres apart.

Following an on-site review, the test pit locations may be varied slightly in order to avoid hazards and obstructions including the following:

- large stone cobbles or tors;
- outcropping bedrock;
- highly disturbed or eroded ground including rabbit burrows, ants nests, buried infrastructure such as pipes or cables; and/or
- substantial vegetation.

If substantial or significant deposits are identified during the test excavation program this will indicate the need for the relocation of a track or for a future mitigation program which might include salvage.

#### 3.3 Hand Excavation

The test excavation program would be carried out in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (Part 6 National Parks and Wildlife Act 1974) (DECCW 2010) Requirement 16a. All pits would be excavated by hand using 50 x 50 centimetre (cm) units. An indicative testing methodology would consist of the following:

1. Mark out and record pit location(s).

The size of an individual test pit will be 50 x 50 cm.

Excavate pit.

Pits will be excavated by shovel and trowel using standard by-hand archaeological methodologies including vertical and horizontal recording of spit levels and sedimentary, cultural and stratigraphic features.

The first excavation unit at each site will be excavated and documented in 5 cm spits. Depending upon the results of the first excavation unit, subsequent spit intervals will be at 10 cm, except in circumstances where the excavation of cultural features or stratigraphic units necessitates a smaller interval.

Excavation will cease when the natural B horizon or the base of Aboriginal object bearing units is reached, or until deposits are sterile. The first pit that is being excavated in 5 cm spits will extend 1 spit to below the sterile layer.

3. Archaeological investigation will not go beyond 150 cm in depth or beyond a depth considered unsafe based on field conditions.



- 4. For each pit photographic and scale-drawn records of the stratigraphy/soil profile will be completed.
- 5. Where cultural features are identified, such as heat treatment pits or hearths, knapping floors are identified then three-dimensional co-ordinates may be taken and detailed plans will be drawn and samples of dateable material will be collected.
- 6. Other samples may be obtained for the potential analysis of paleoenvironmental indicators such as pollen, phytoliths and microfauna.
- 7. All excavated material will be sieved through at least a 5 millimetre (mm) mesh, with use of a top larger mesh (10 x 10 mm) where appropriate. All identified or suspected cultural material recovered from sieving will be retained, bagged and labelled.

Bioarchaeological material that may be encountered during testing and salvage includes faunal remains, shell, macrobotanicals, and charcoal. Collection of this material provides information on subsistence, past environments, and are a source for dating materials. Recovery of these materials can occur in three situations: 1) associated with hearths, 2) from middens, 3) low density or isolated materials collected from sieves. Collecting material from these contexts during sub-surface investigations varies:

- Hearth materials. Materials would be collected and recorded in situ where possible. This
  includes charred organics, bone, and shell. A series of charcoal samples would be collected
  from appropriate stratigraphic contexts for possible further analysis. Bone and shell found
  during sieving would be bagged separately to lithics, and if wet, allowed to dry prior to
  storage to prevent bacterial and fungal growth.
- Midden materials. A bulk sample of Midden materials would be collected (i.e. all sediment
  and organics), and not sieved during excavation. Sieving and analysis would take place
  under controllable conditions in a laboratory. This provides a valuable analysis of midden
  materials as biological materials, and small bone and shell tools (e.g. bone points), are
  frequently not identified during onsite excavations. Remainder of the Midden samples would
  be sieved in the field and bagged separately to the lithic assemblage.
- Isolated materials. Isolated shell and bone from archaeological deposits would be recorded
  and recovered in situ where possible, however biological materials are likely to be found
  during sieving. Only faunal bone and shell would be recovered from sieves and bagged
  separately to lithics. If wet, all organic materials are to be allowed to dry prior to storage to
  prevent bacterial and fungal growth.

#### 3.4 Salvage Excavations

Further salvage excavations would be carried out in accordance with the Conditions of Approval (B31, B32 and B33) and would be dependent on the test excavation results, which will be assessed on a site-by-site basis. This is to be determined by the project archaeologist, and in consideration of existing project UMMs for sites of comparable significance/degree of proposed impact.

Where salvage is to be undertaken, the initial  $50 \times 50$  cm test pit will be expanded to  $1 \times 1$  m with additional  $1 \times 1$ m squares excavated around the deposit in a contiguous open area until a representative sample has been recovered. Salvage excavation will be limited to the area of impact (disturbance footprint). Individual excavation squares would be hand excavated in stratigraphic units



(Unit A, Unit B, etc.). Squares would be excavated until the basal layer or culturally sterile deposit is reached. Where results indicate no archaeological stratigraphy within units, i.e. the A1 and A2 soil layers are culturally one layer (suffering from cyclical soil transfer resulting in a mixed cultural profile within the soil), these can be salvaged as one unit where possible.

Sieving and recording will be conducted in the same manner as Section 3.3 above.



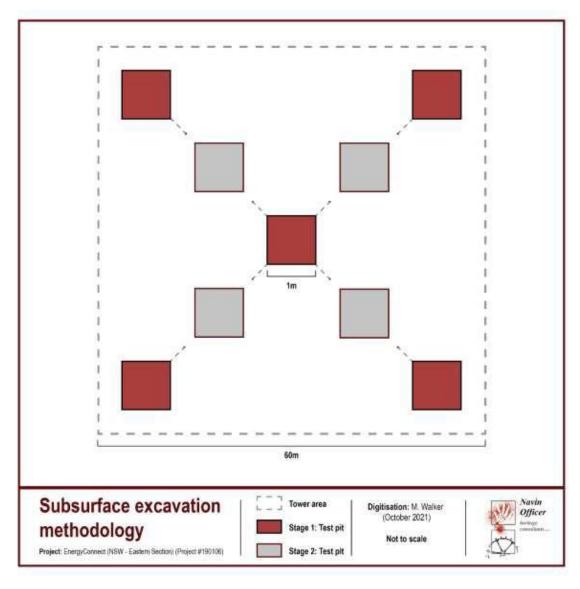


Figure 1 Location of proposed test pits within tower locations



#### 4 Surface Collection Methodologies

#### Surface collection methodology

The following methodology will be implemented for salvage collection of the identified surface artefacts.

- Re-visit the location of the previously recorded surface artefact occurrence.
- Salvage personnel will collect the artefact.
- A sketch map will be drafted for the collected site, showing:
  - Local features, including vehicle tracks and north direction;
  - A graphic approximation of artefact densities;
  - The spatial extent of the surface distribution; and
  - o The location of any separate collection areas.
- GPS positions will be logged for the collection area.
- One or more digital photographs will be taken and logged, showing the general context of the artefact.
- The collected artefact will be appropriately bagged and labelled.
- The collected artefact will be temporarily held by the consultants and described by a lithic specialist:
  - Basic technological traits will be recorded; and
  - The artefact will be photographed using a digital camera.

Any surface artefacts will be recorded and moved off of the track or collected, depending on the wishes of the RAPs. If artefacts are moved the artefact locations will be recorded as sites and then entered on the Aboriginal Heritage Information Management System (AHIMS) database. The recording will include a record of their original location. Artefacts may be grouped into sites and the location provided to AHIMS accordingly.

#### 5 Materials Analysis

#### 5.1 Lithic (stone) Material

All lithic items would be examined in detail by a lithic specialist, using a low-power binocular microscope and incident illumination and/or hand lens. Descriptive recording of collected material



would be to a level concomitant with the stated testing and salvage aims of the investigation, and the number of artefacts/type of material recovered.

#### **Management strategies**

Attributes for each artefact in the assemblage would be entered into a relational database and digital photographs may be taken of select artefacts, where appropriate. Information for each specimen recorded in the analysis would be provided in an appendix in the final report. The analysis would specifically address the following research questions:

- Source information. What raw material resources were used; where did they come from; and what does this tell us about Aboriginal use of the region in the past?
- Stone reduction technology. How was the stone worked and used? Does this change over time? Can the function of the site be inferred from the artefact assemblage? What does this tell us about Aboriginal occupation, use, settlement and activities undertaken through time in this region?
- Post-depositional influences. What post-depositional influences have impacted the assemblage, and what does this tell us about the integrity and significance of the site?
- Site chronology. When was the site occupied? Was the assemblage the product of repeated
  occupations or a single event? Is there spatial patterning in the assemblage, and what does
  this tell us about repeated use, activities and/or occupation of the region through time?

If suitable material is identified during the excavation conjoin analysis (re-fitting) on a sample of artefacts may be undertaken.

The primary aim of the analysis of the lithic items retrieved from the test locations would be to assist in the assessment of the significance of the sites/deposits and to identify appropriate management strategies.

The analysis will be consistent with standards and guidelines defined by Heritage NSW.

#### 5.2 Midden (shell) and animal bone

Bioarchaeological materials such as midden (shell) and animal bone will be examined by a trained Bioarchaeologist, (or other suitably qualified faunal specialist, depending on availability), using a stereoscope and/or hand lens. Descriptive recording of collected material would be to a level concomitant with the stated testing and salvage aims of the investigation, and the amount of material recovered. Analysis of bioarcheological material varies based on the mode of collection:

- Bulk collected materials; and/or
- Isolated finds and materials from sieves.

Material collected in bulk (e.g., from middens or hearths) would be processed in the NOHC or KNC lab. Organic materials, including faunal bone, shell, macrobotanicals, and charcoals, will be separated and available for further analysis. All material will be entered into a relational database and photographs may be taken of selected materials, where appropriate.



Shell and faunal materials will be further analysed to understand aspects of past life ways. Shells and faunal assemblages will be analysed using quantitative methods. Information for each specimen recorded in the analysis would be provided in an appendix in the final report. The analysis would specifically address the following research questions:

- Assemblage composition: What species are recovered; are these endemic, native or introduced; and what do they tell us about past subsistence patterns or past environments?
- Anthropic modifications: is there evidence of butchery or other modifications (e.g. tools); and how does this contribute to regional models of tool production?
- Post-depositional influences. What agents have impacted the assemblage; what does this
  tell us about natural or anthropic assemblage origins; and how does this influence site
  formation models and significance assessments?

The analysis will be consistent with standards and guidelines defined by Heritage NSW.

#### 5.3 Hearth material

If hearths are identified during excavation, these will be recorded using digital photography and/or drawn in plan and section. Charcoal, if present, will be sampled to allow radiometric dating and other appropriate analysis to be undertaken. Samples may be taken of hearth heat retainers be they stone or clay.

### 6 Care and Management of Recovered Artefacts

The long-term management of Aboriginal objects recovered from mitigation activities would be determined in consultation with the RAPs and in accordance with the HMP and any relevant CoA. Salvaged archaeological materials will be stored in appropriate facilities confirmed in consultation with the RAPs. Management of salvaged/collected Aboriginal objects would also be undertaken in accordance with any relevant cultural protocols identified by RAPs. It should be noted that the long-term management of archaeological materials is outside the scope of the HLWJV construction work, and will be managed prior to operation.

#### 6.1 Short Term Management

Disposition and storage of collected stone artefact assemblages during this test excavation will be dealt with in accordance with the Code of Practice (Part 6 National Parks and Wildlife Act 1974) under Requirement 26.

After examination and measurement, all recovered artefacts will be stored individually in standard resealable plastic bags or bagged in appropriate and identifiable units. The bags will be labelled using a permanent black pen with the item's unique identification number (where generated and appropriate), and/or details of its provenance within the excavation (as appropriate). The material will be stored at the NOHC or KNC lab premises.

#### 6.2 Long Term Management

Following completion of the analysis of the recovered artefacts; the long-term management of the artefacts will be discussed with the RAPs as outlined in Requirement 26 of the Code of Practice. There are several possibilities for long-term management of the project assemblages, including *Unit 4, Kingston Warehouse* 

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reburial on Country and/or handing the artefacts to the Aboriginal community through a Care Agreement with the appropriate Local Aboriginal Land Council (LALC) or other community organisation. It may be decided to split the project assemblage, with some objects undergoing reburial, and the retention under a Care Agreement of specific collections of artefacts for the Aboriginal community to assist with cultural story-telling, interpretation, training and education or display purposes. The determination of long-term management outcomes will require consultation and agreement between RAPs.

#### **Reburial on Country**

Multiple artefact reburials may be undertaken for the project. The location selected for any artefact reburial should be outside of any direct impact areas associated with the project. It may be located within an environmental conservation or management area or within an offset site. The location of the reburial should be consulted on and decided with RAPs. Artefacts from surface collection, test excavation, and salvage excavation may be reburied together. The salvage assemblage may be split into multiple reburials (e.g. one for each major catchment, one for each respective LALC area, by individual sites or groups of sites, by proximity to where they were found etc), or for other cultural reasons determined by the Aboriginal community. In the instance where the reburial is to be undertaken on land outside the CSSI Approval Area, any relevant approvals or consents under the *National Parks and Wildlife Act 1974* or *Environmental Planning and Assessment Act 1979* must be sought and granted prior to proceeding. Specific cultural requirements and protocols to be followed for the reburial process may be identified by the Aboriginal community.

The general process for reburial is as follows:

- 1. Confirmation of the reburial location.
- 2. The artefact assemblage would be prepared for reburial in accordance with Requirement 26 of the Code of Practice, which specifies how artefacts should be organised, packaged and labelled for reburial, unless RAPs agree to an alternative deposition method.
- 3. A date and time is set for the reburial and project RAPs are invited to attend
- 4. Welcome to Country, smoking ceremony or other appropriate cultural acknowledgements may be undertaken
- 5. A hole large enough for the packaged assemblage is excavated at the nominated location and the assemblage is placed in the ground. A small metal plate or pole is placed with the assemblage, to allow future relocation by a metal detector if necessary.
- 6. The hole is backfilled carefully, compacted and made level with the surrounding area. If small plantings or a top-cover of bark chips or similar is required to blend the area in with the landscape this can also be undertaken.
- 7. The reburial process is photographed and documented for posterity, including taking a GPS position of the reburial location and preparation of a site sketch plan.



Following confirmation of reburial of the objects, the reburial location is registered on the AHIMS database as an Artefact Reburial archaeological site. This helps ensure the location is avoided by future projects in the area. AHIMS site cards for the artefact origin sites may also be updated at this time to include information about the reburial.

#### **Care Agreement**

Section 85A(1)(c) of the National Parks and Wildlife Act 1974 allows for the transfer of Aboriginal objects to an Aboriginal person or an organisation representing Aboriginal people under a Care Agreement. While the provisions of the National Parks and Wildlife Act 1974 do not apply for the current project (being CSSI and under a Project Approval), a Care Agreement would be consistent with the CoA. The possibility for Care Agreement arrangements will require consultation and agreement between RAPs, and may be prepared for stone artefacts and/or salvaged culturally-modified (scarred) trees.

The custodian may be a LALC or another Aboriginal community organisation or individual representing Aboriginal people. It is also possible to split the assemblage between the relevant LALCs (with objects salvaged within each LALC area transferred to the relevant LALC) or between a LALC and one or more other Aboriginal organisations.

A Care Agreement enables Aboriginal communities to care for Aboriginal objects that have been excavated, disturbed or moved. It is an agreement between two parties – NSW DCCEEW (as Heritage NSW) and the person or organisation asking for Aboriginal objects to be transferred to them. The Care Agreement sets out the obligations of both parties. The transferred Aboriginal object(s) are not owned, they are handed over for long-term safekeeping. A separate Care Agreement would be required for each organisation or individual seeking to become a custodian of the artefacts.

To arrange a Care Agreement, an 'Application for the transfer of Aboriginal objects for safekeeping' form must be completed and submitted to Heritage NSW. Transgrid and/or the project archaeologist may seek to assist with this process, including completing the application form(s) and preparing supporting documents to submit with the application(s).

The general process is as follows:

- 1. LALC or other Aboriginal community group/individual (the Applicant) to confirm they would like to make an application under the *National Parks and Wildlife Act 1974*
- 2. Preparation of the application form. This includes details about the project, the archaeological sites the objects came from, and information about the artefacts themselves.
- 3. Preparation of additional supporting information for the application, including records of Aboriginal community consultation, background archaeological reports, and CoA documents.
- 4. Applicant to complete the application form. This includes providing details for the custodian organisation, a contact person, and information on how and where the objects will be stored. The application form must be signed.



- 5. Once all the application materials are complete and prepared, the application package is submitted to Heritage NSW at <a href="https://heritagemailbox@environment.nsw.gov.au">heritagemailbox@environment.nsw.gov.au</a>.
- 6. Heritage NSW considers the application. Heritage NSW may contact the Applicant for further discussion during this period.
- 7. If the application is granted, Heritage NSW will contact the Applicant directly to negotiate and prepare the Care Agreement.
- 8. The Care Agreement will include details about the location, storage, care, recording and notification requirements of the Aboriginal objects that are the subject of the application.
- 9. A copy of the Care Agreement will be sent to the Applicant. To execute the agreement, it will need to be signed and witnessed, and then returned to Heritage NSW
- 10. When the Care Agreement is complete and officially executed, arrangements will be made to deliver the objects to the Applicant.
- 11. AHIMS site cards for the sites whose artefacts have been transferred will be updated to note that the artefacts are now in the care of the Applicant.
- 12. Ongoing care and management of the artefacts by the Applicant must follow the terms of the Care Agreement.

It may also be possible for the LALC or other Aboriginal community group/individual to take custody of a smaller group or subset of artefacts from the project assemblage under a Care Agreement, with the rest to be reburied on Country.

If the LALC or other Aboriginal community group/individual chooses to keep some objects, and rebury the rest, the processes outlined above would be used for each group. The Care Agreement(s) and supporting information should note if the retained objects form part of a larger assemblage, the remainder of which has undergone reburial on Country. The selection of objects to be retained under a Care Agreement may be determined by their association with a particular area or archaeological site, by the nature and types of the artefacts, or by the size of the assemblage. These are suggestions only, and will depend on the needs and goals of the Aboriginal community for the Aboriginal objects. The retained artefacts may be stored for safe-keeping, used for display, educational purposes, interpretation, site officer training, to assist cultural story-telling or other purposes allowed under the Care Agreement(s).

### 7 Report preparation

Information gained in the course of the survey and information provided by the Aboriginal community will be documented in a report (except where information has been identified as culturally sensitive and therefore restricted).

The report will be provided within 12 months from the completion of materials analysis which will be completed in accordance with Section 5. The report will:



- Describe the methods and results of the excavation program
- Detail the results of the analysis of recovered Aboriginal objects
- Provide an assessment of significance of identified sites.
- Detail the long-term management of Aboriginal objects
- Include a statement of compliance with approval conditions and management and mitigation measures, and
- Confirm that Aboriginal Site Impact Recording Forms have been completed and submitted to the Heritage NSW AHIMS Registrar.



### Annexure C. HLW Aboriginal Sites and PADs

The figures provided in this this document are extracts from the HumeLink AR – Technical Report 2 (map series A5.3, NOHC 2024)

























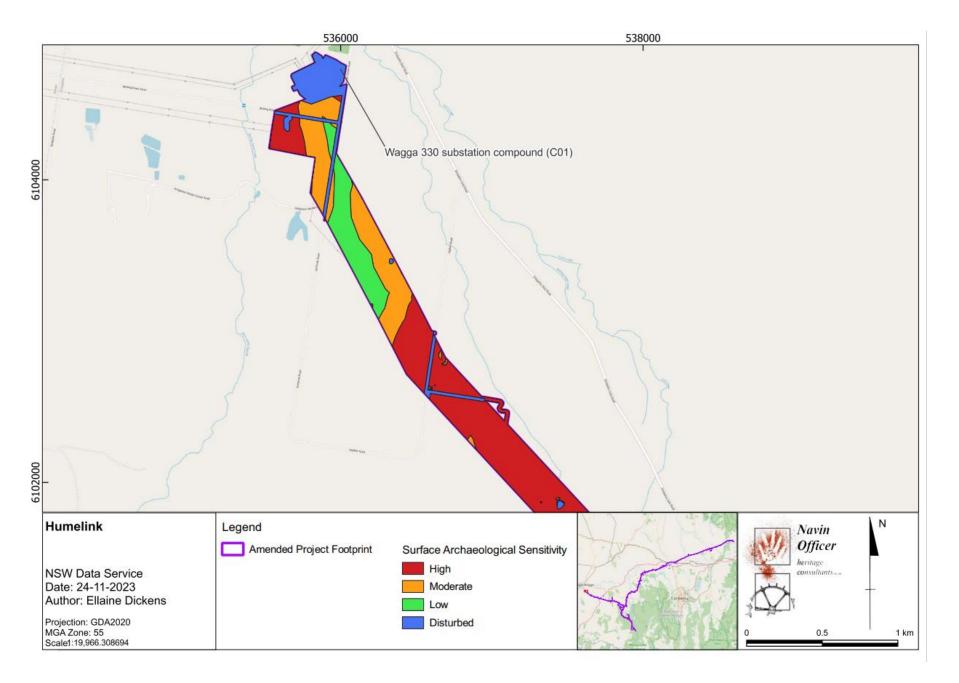


## Annexure D. HLW Aboriginal Archaeological Sensitivity – Surface Model

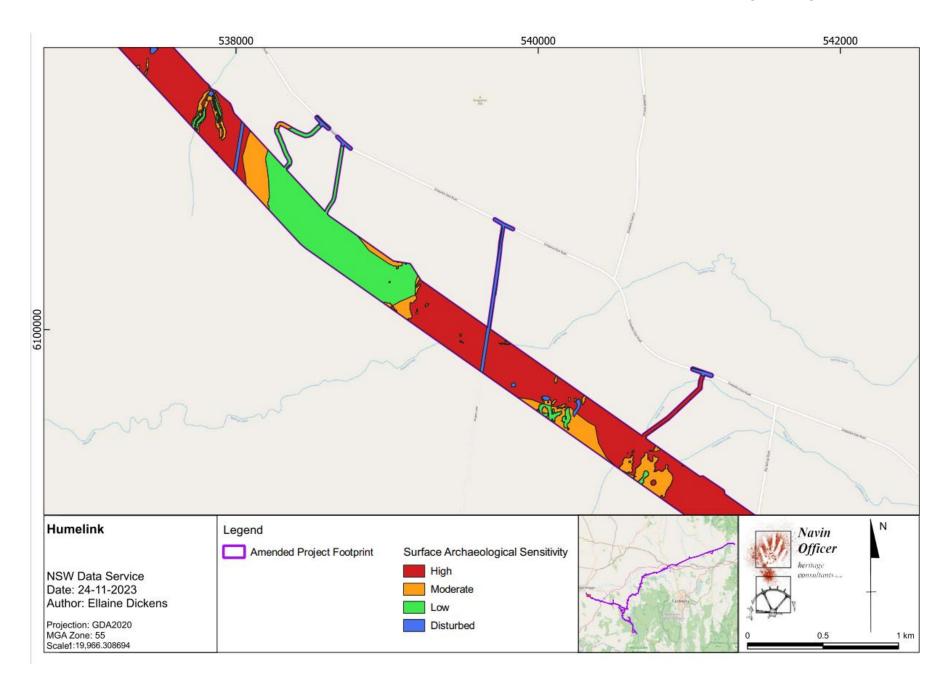
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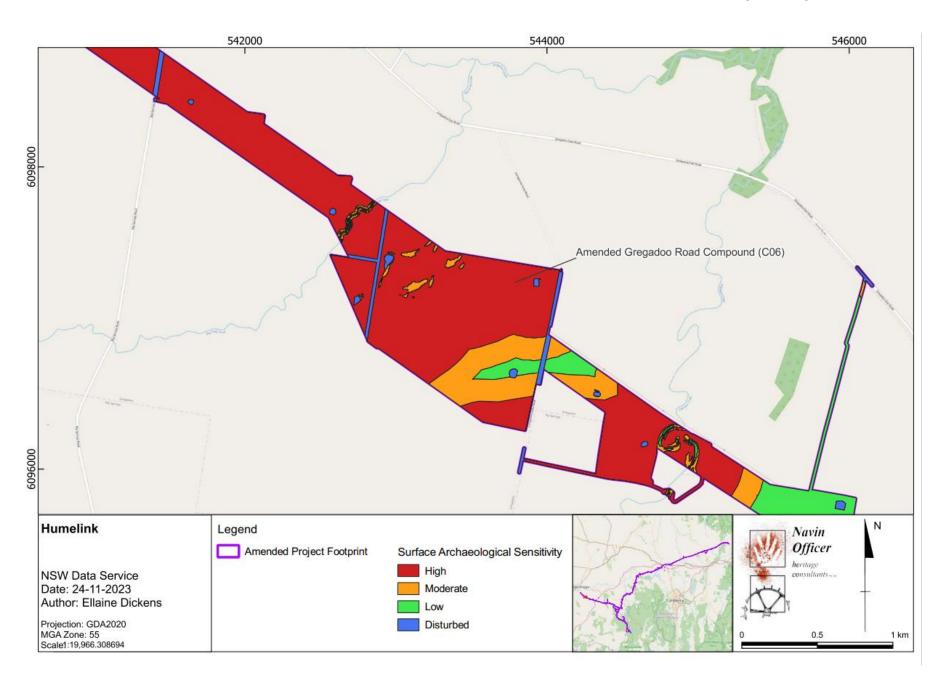




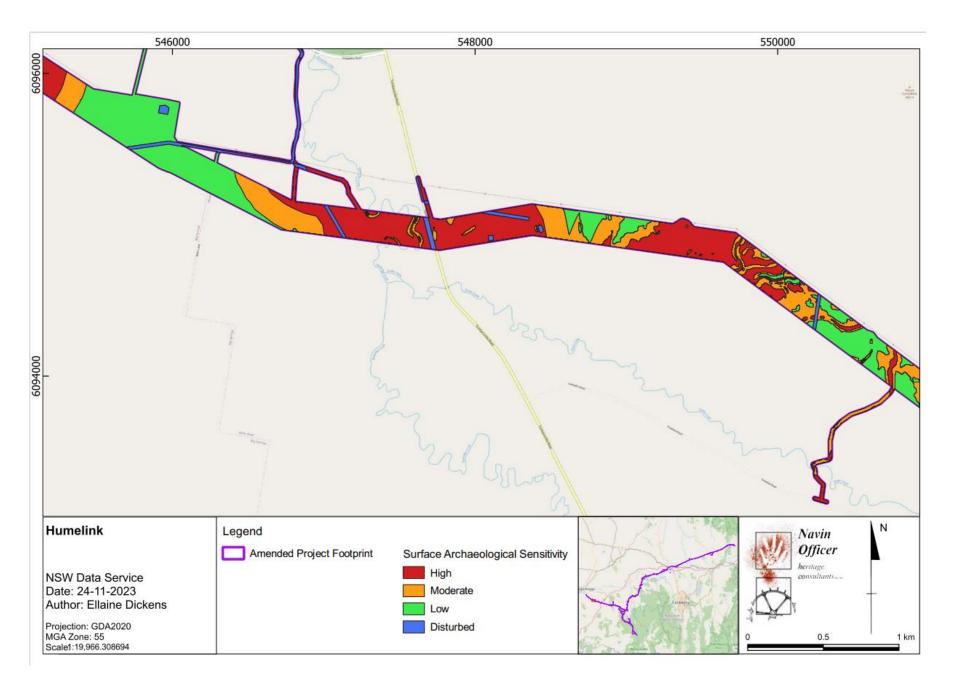




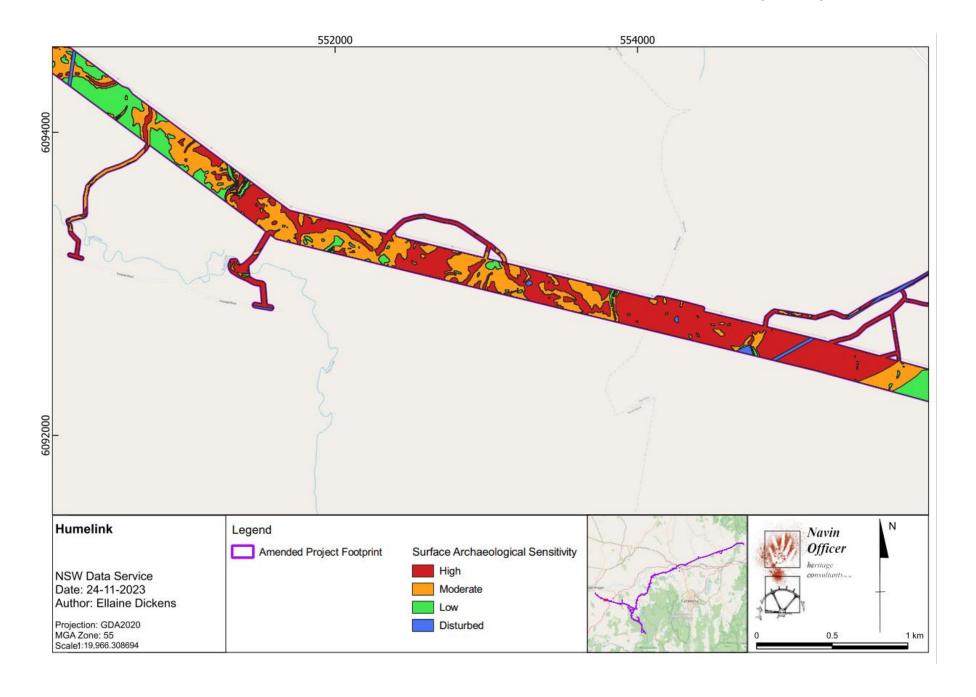




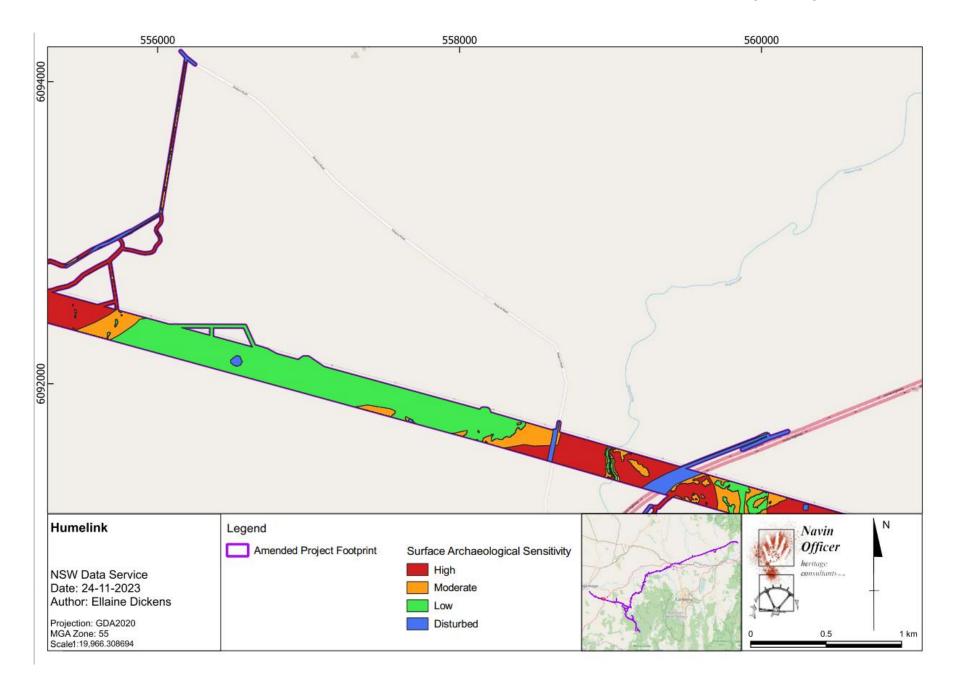




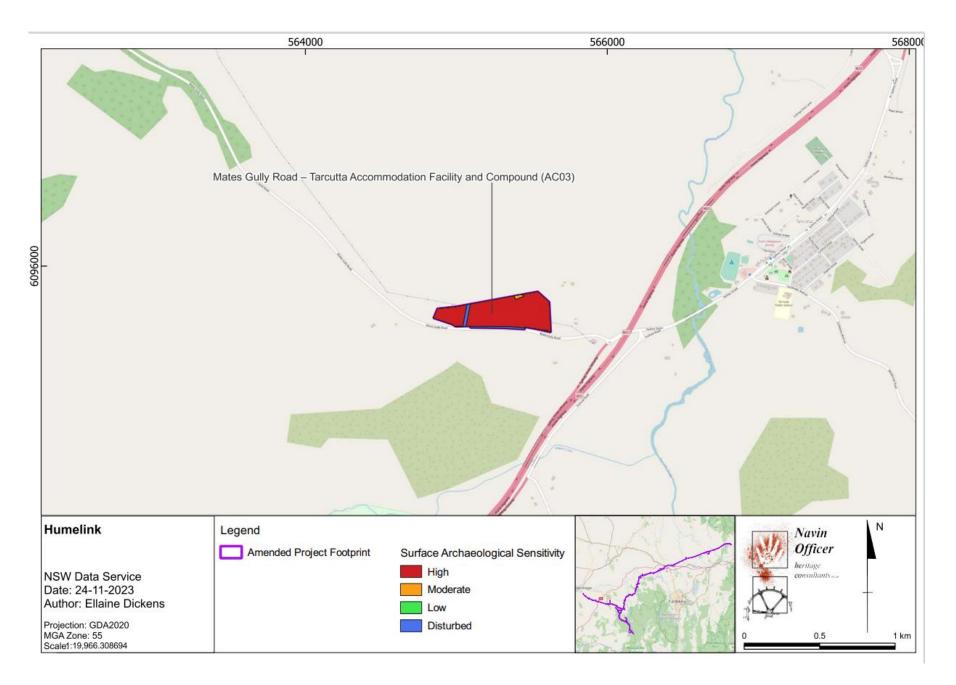




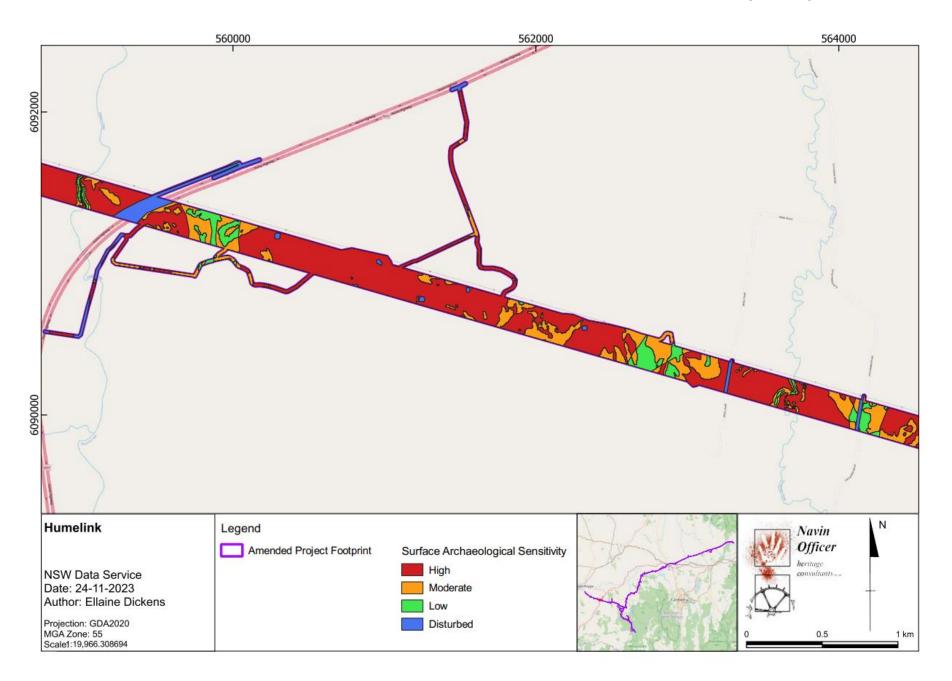




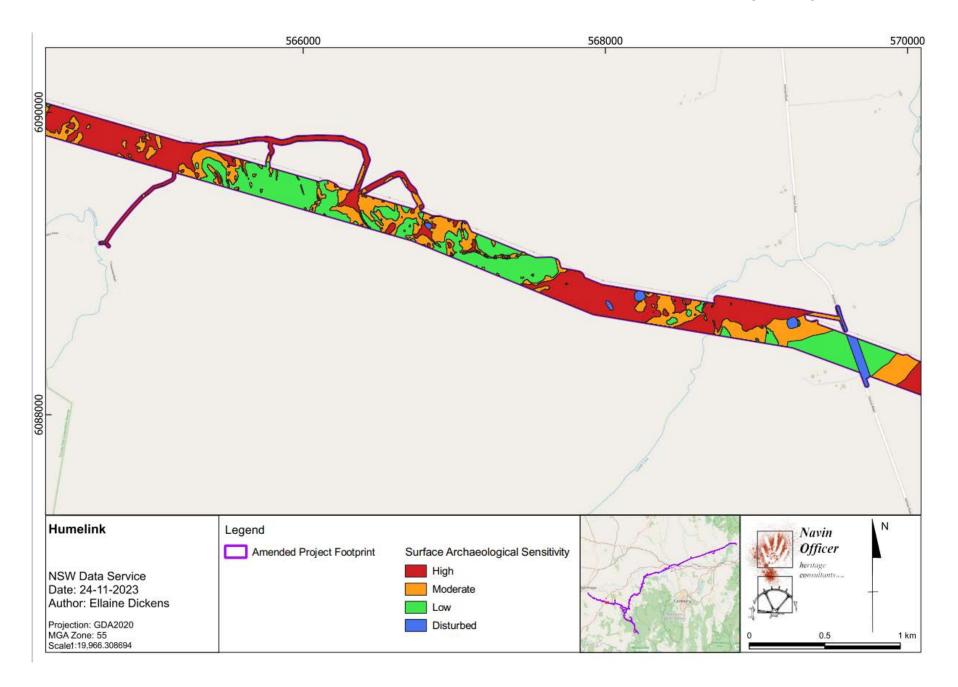




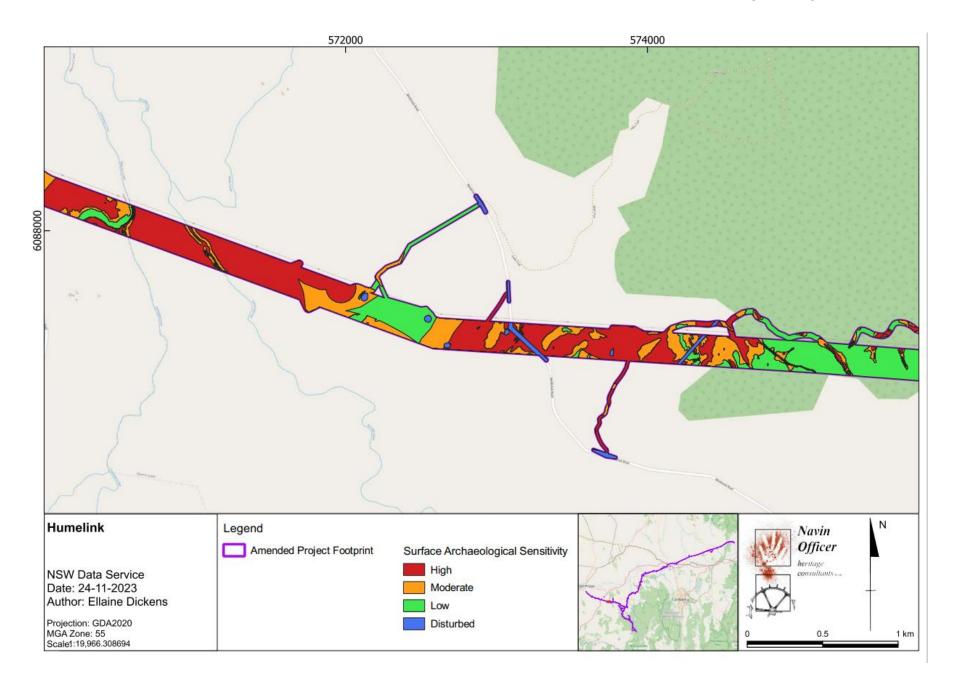




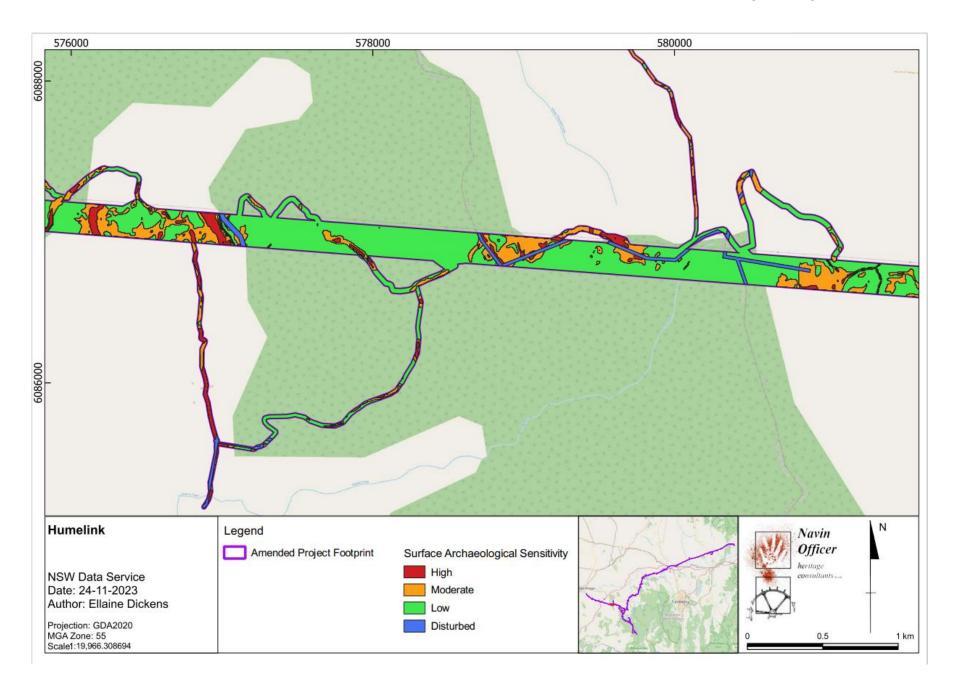




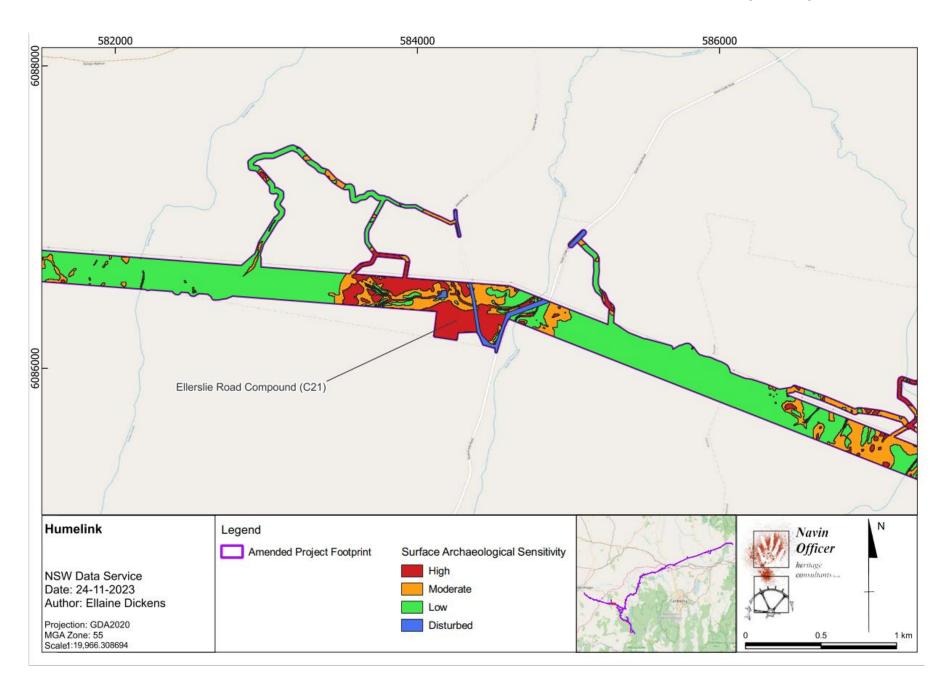




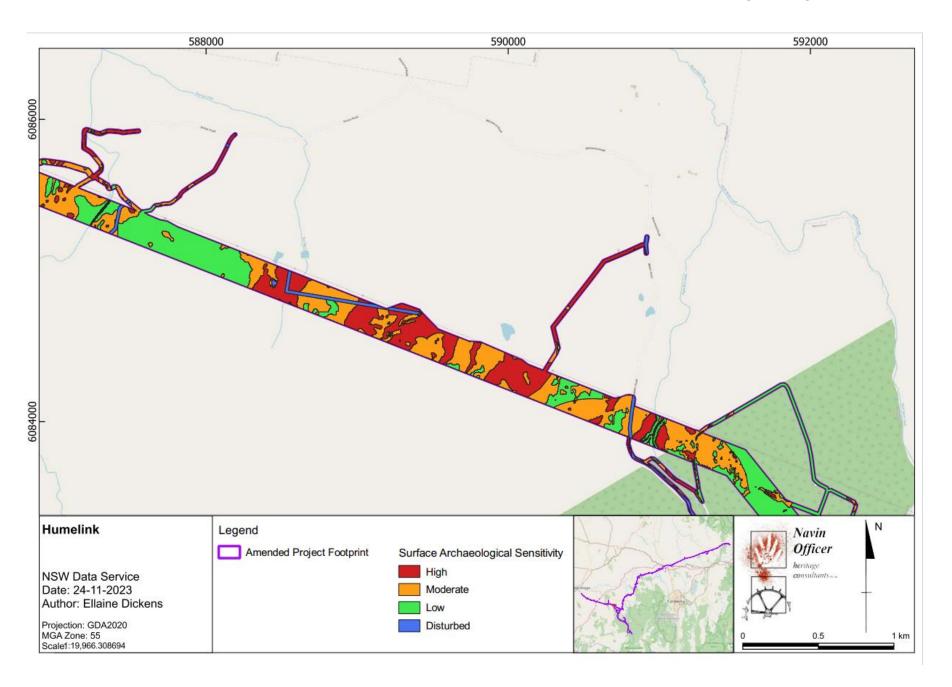




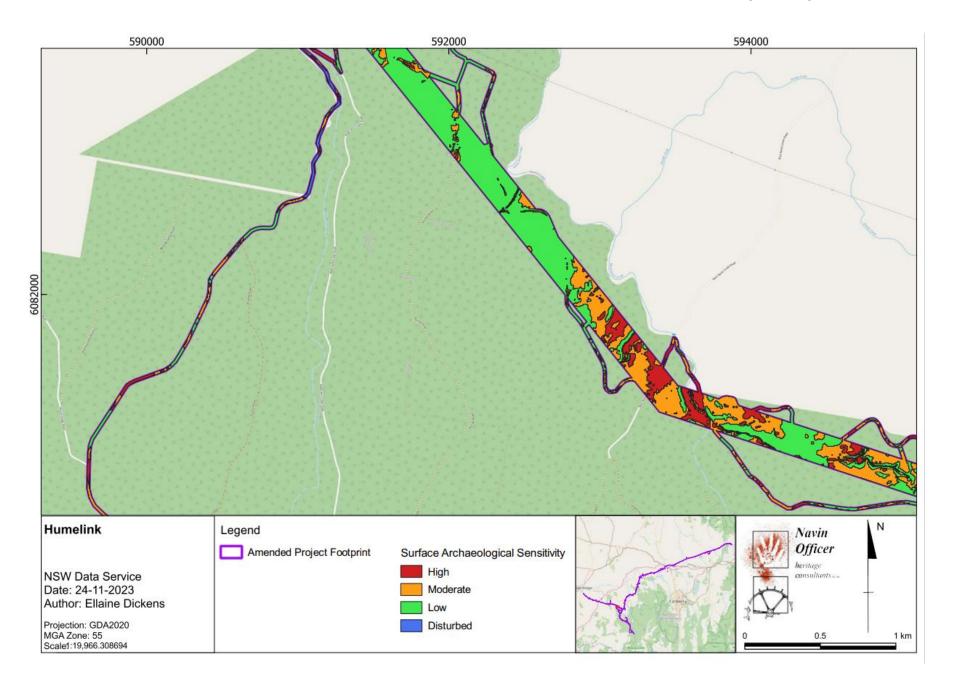




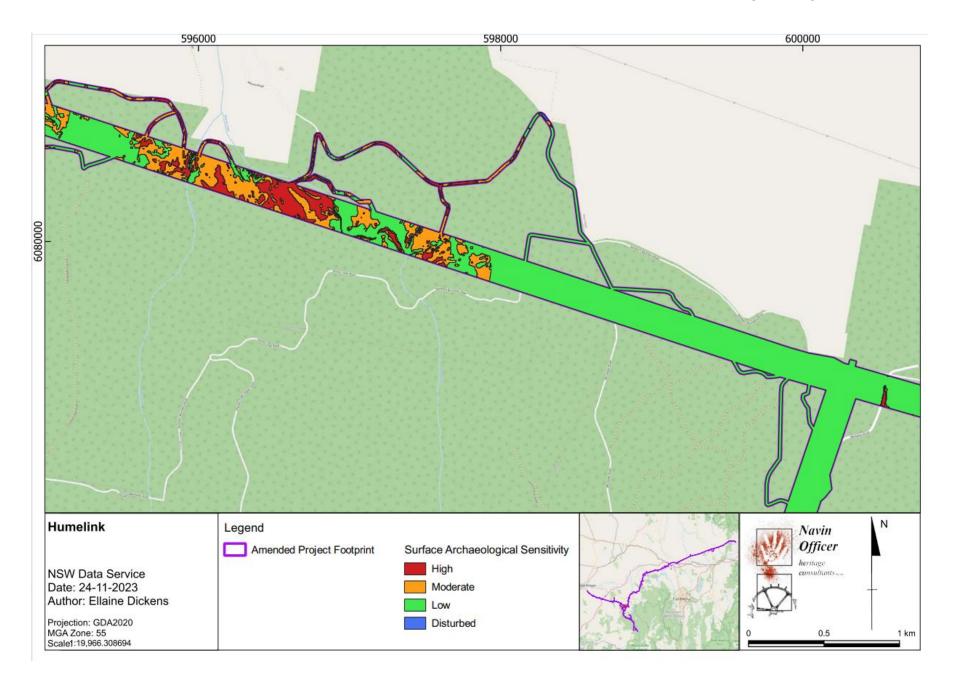




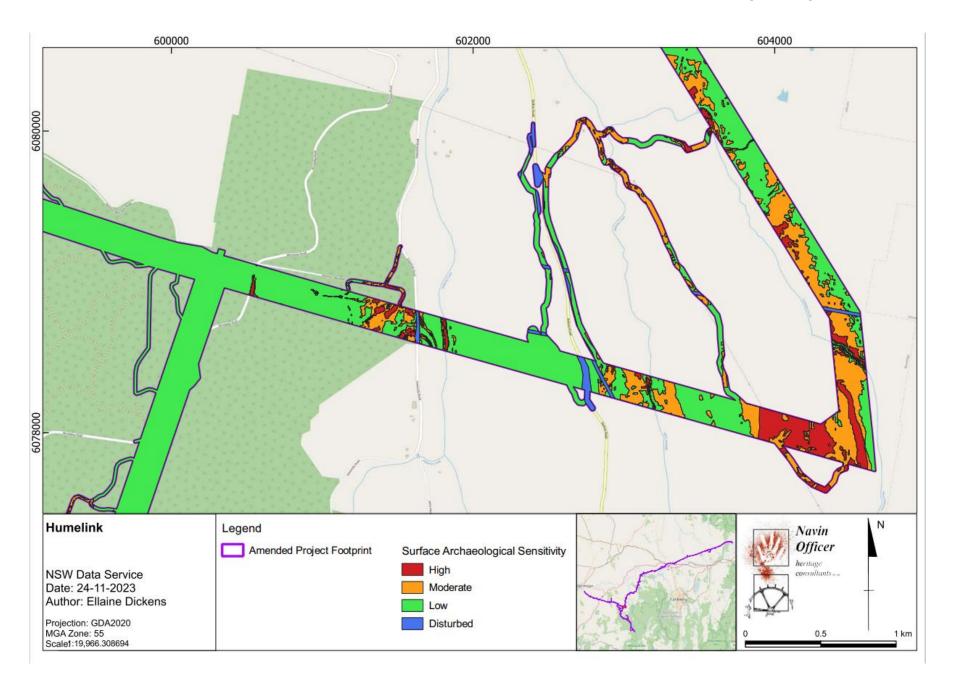




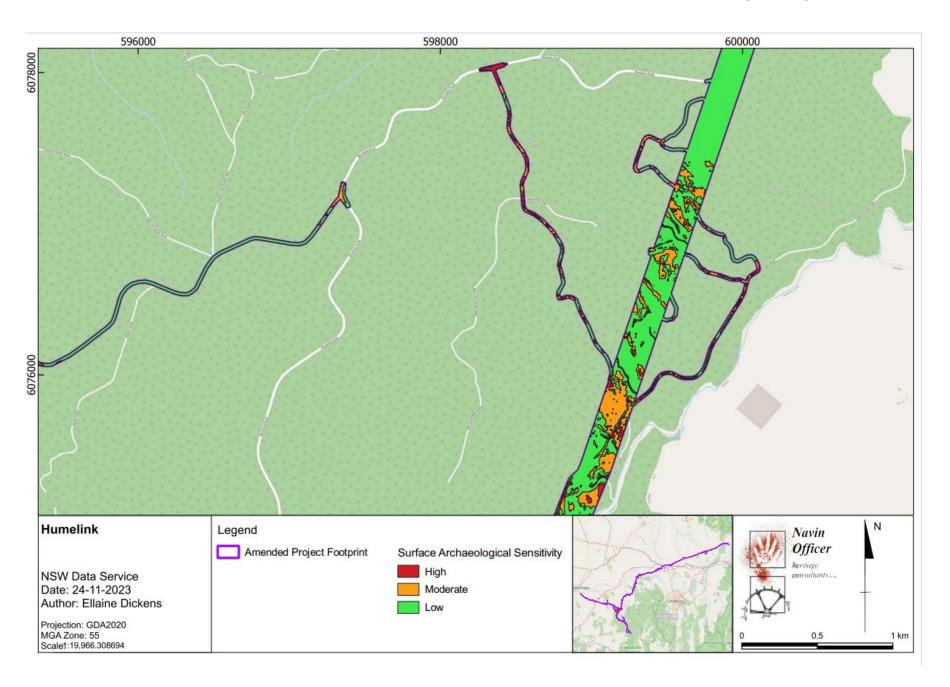




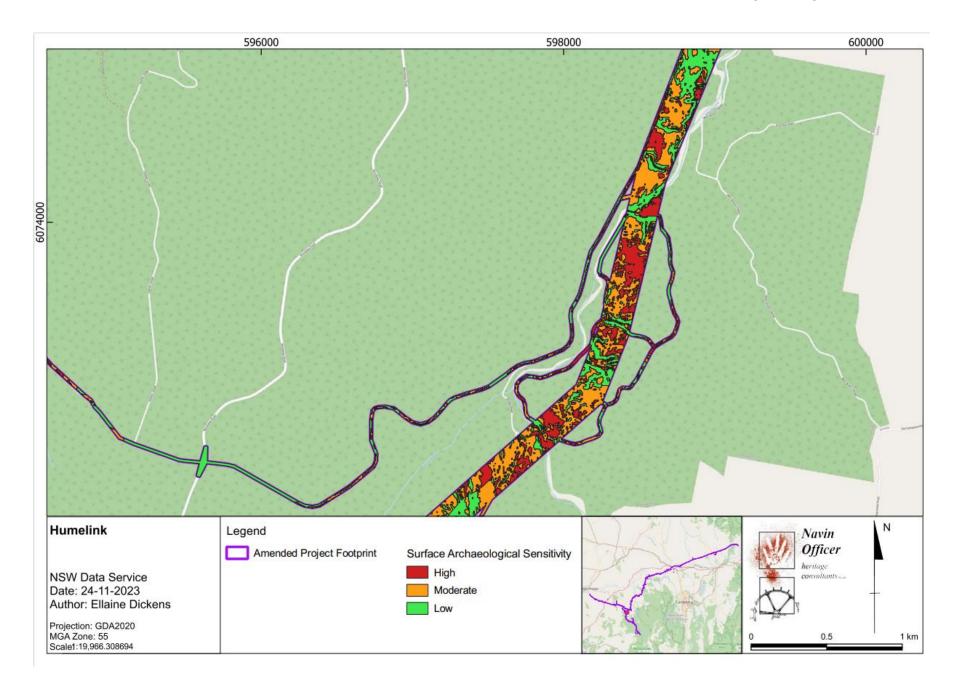




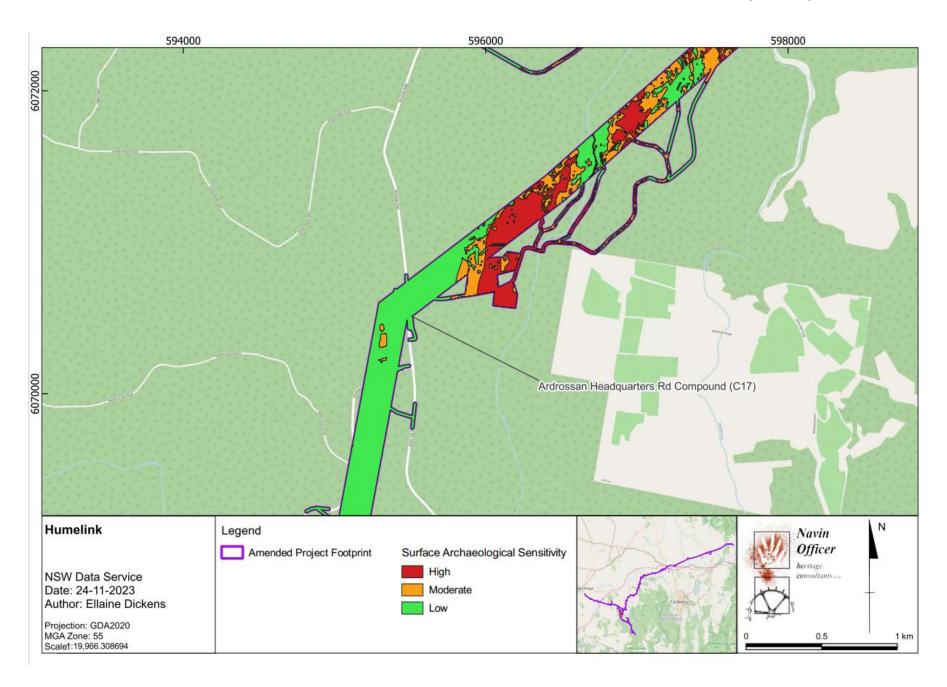




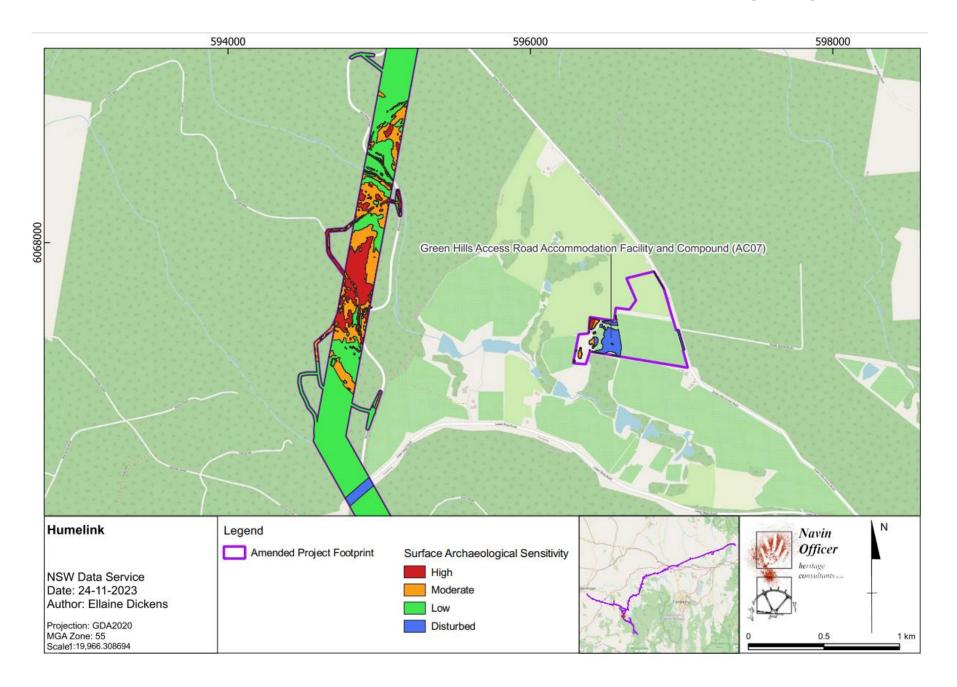








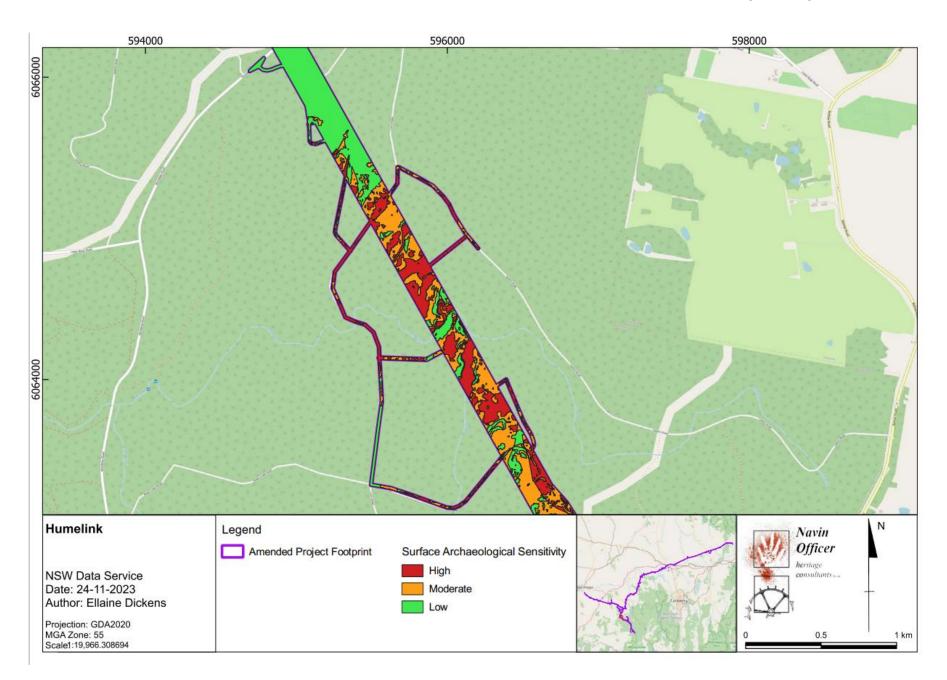




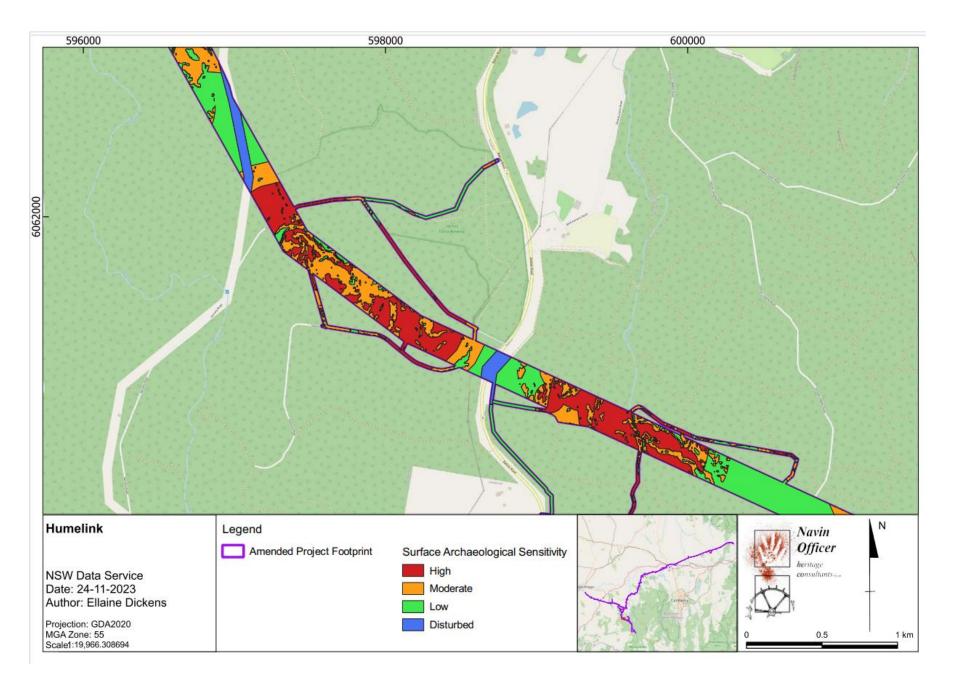




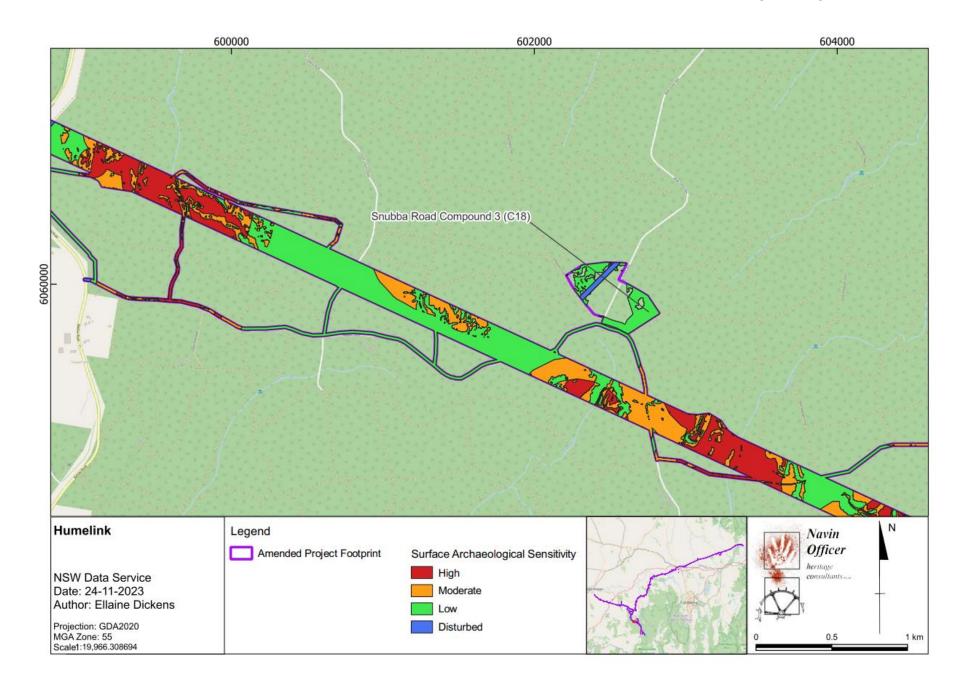




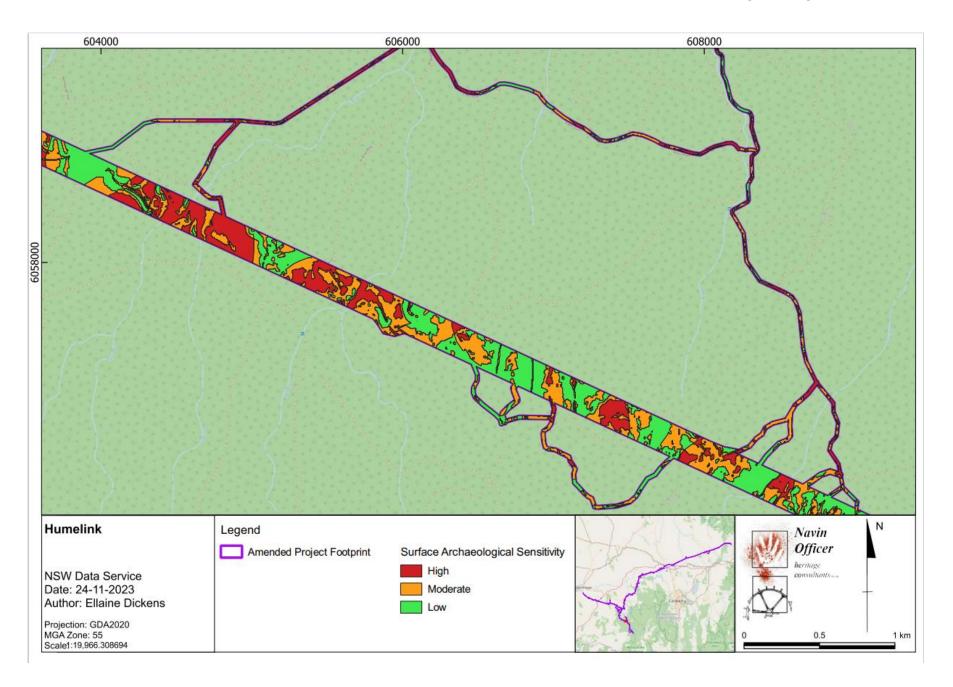




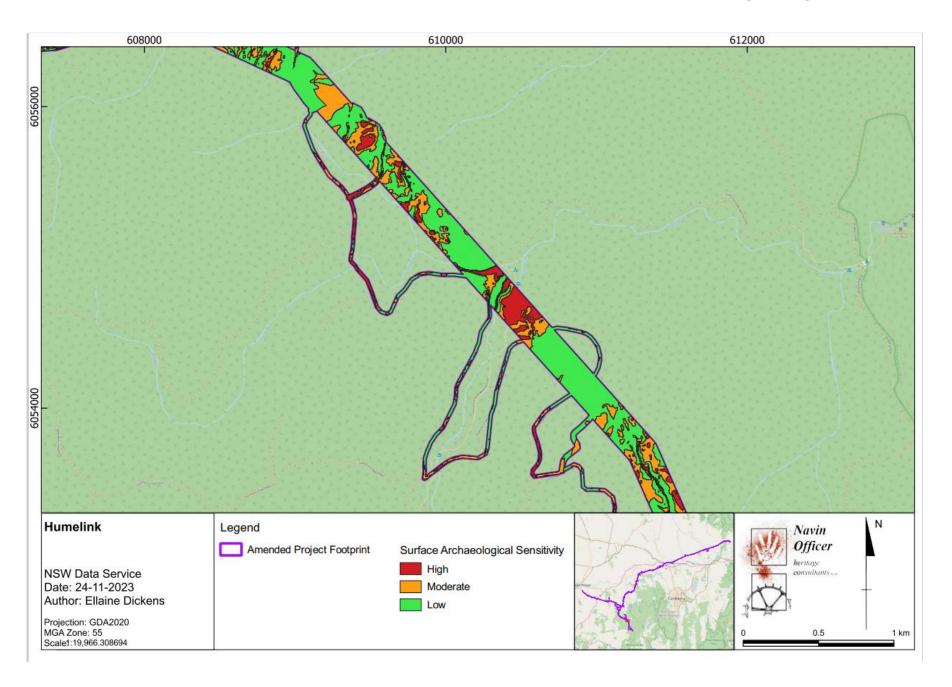




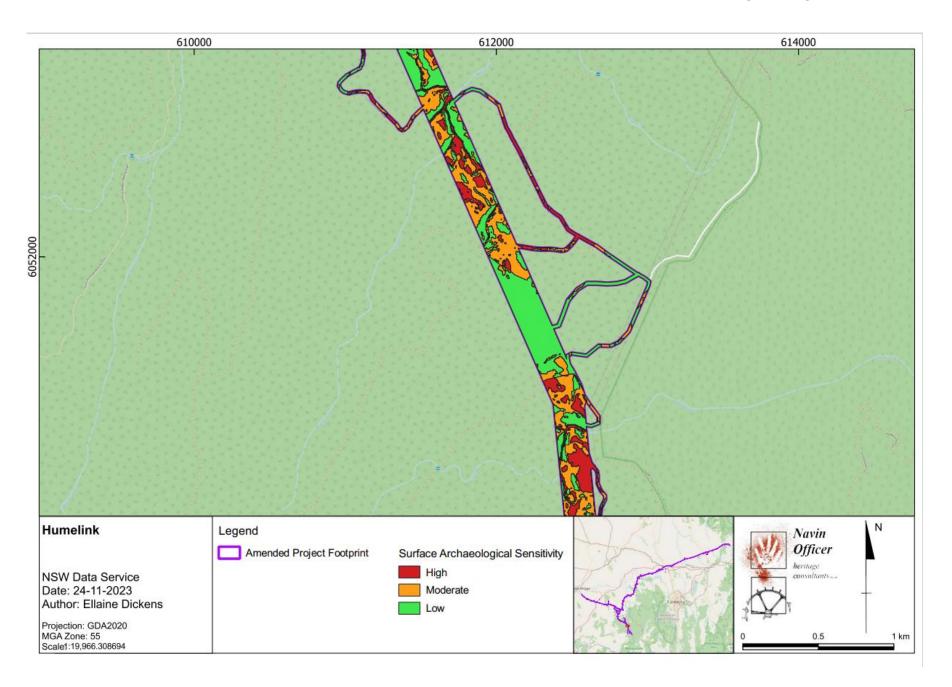








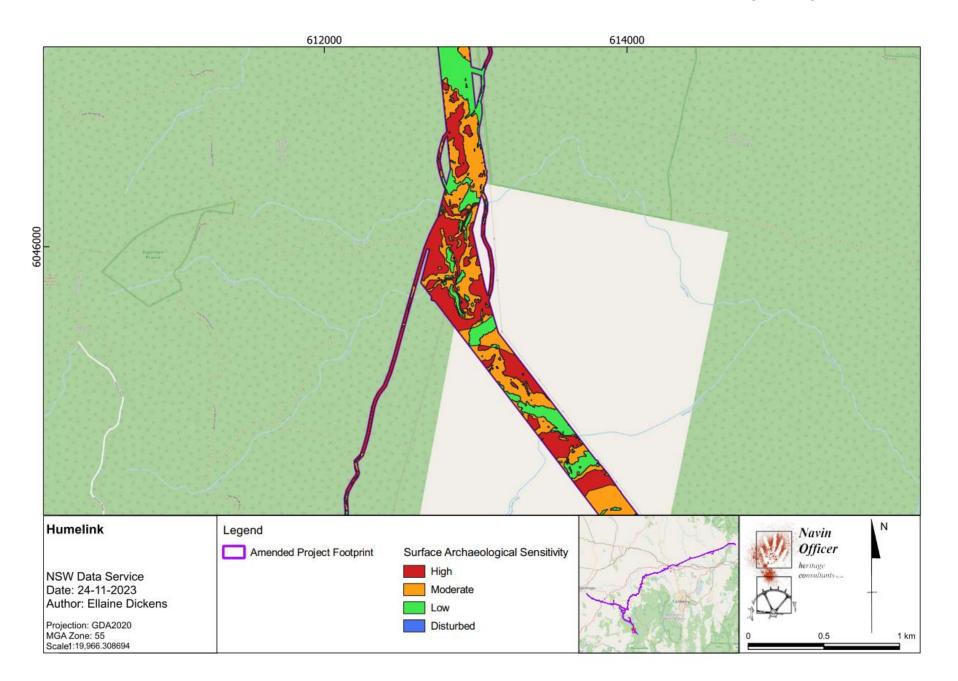








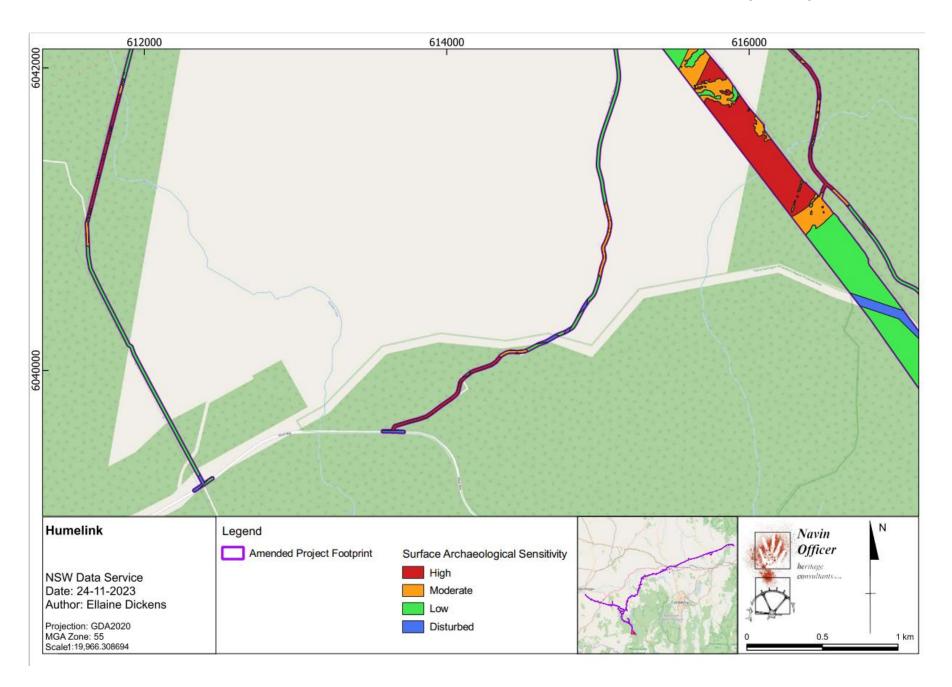




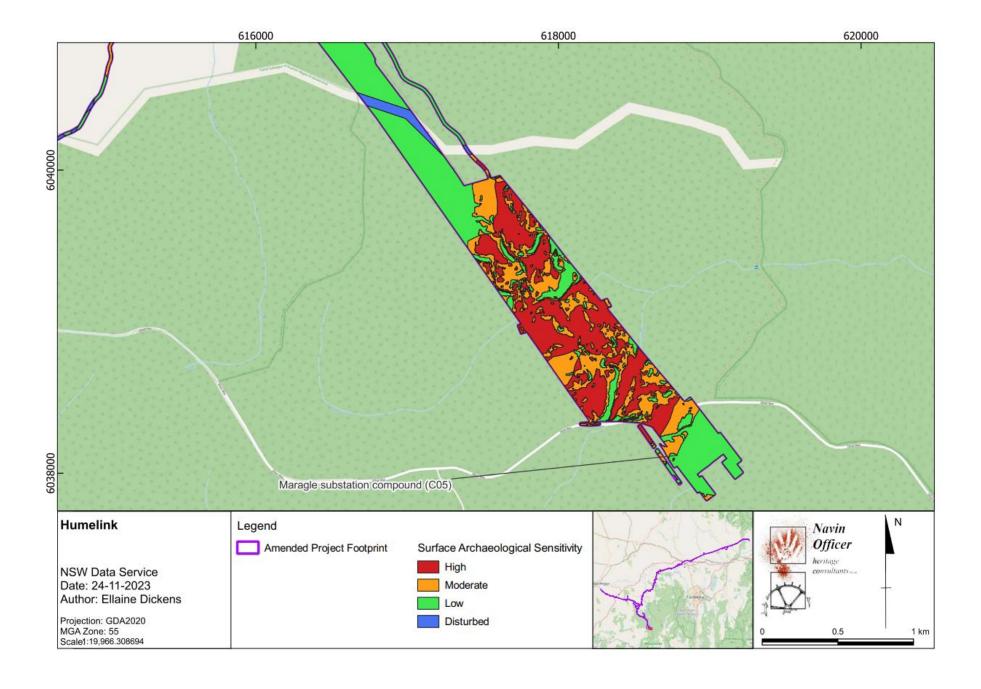












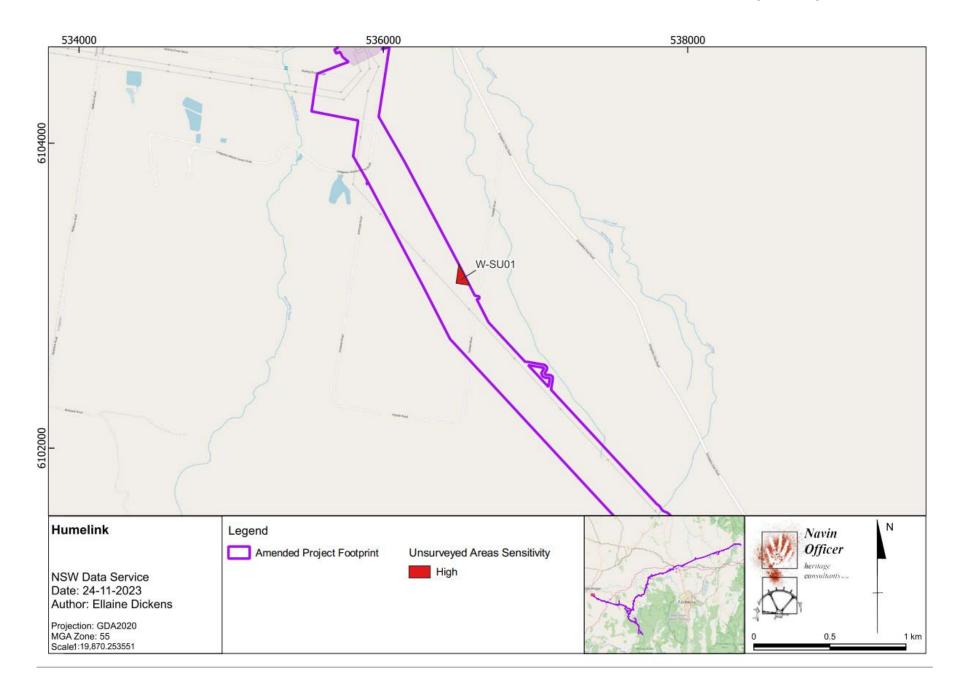


# Annexure E. HLW Aboriginal Archaeological Sensitivity – Unsurveyed Areas

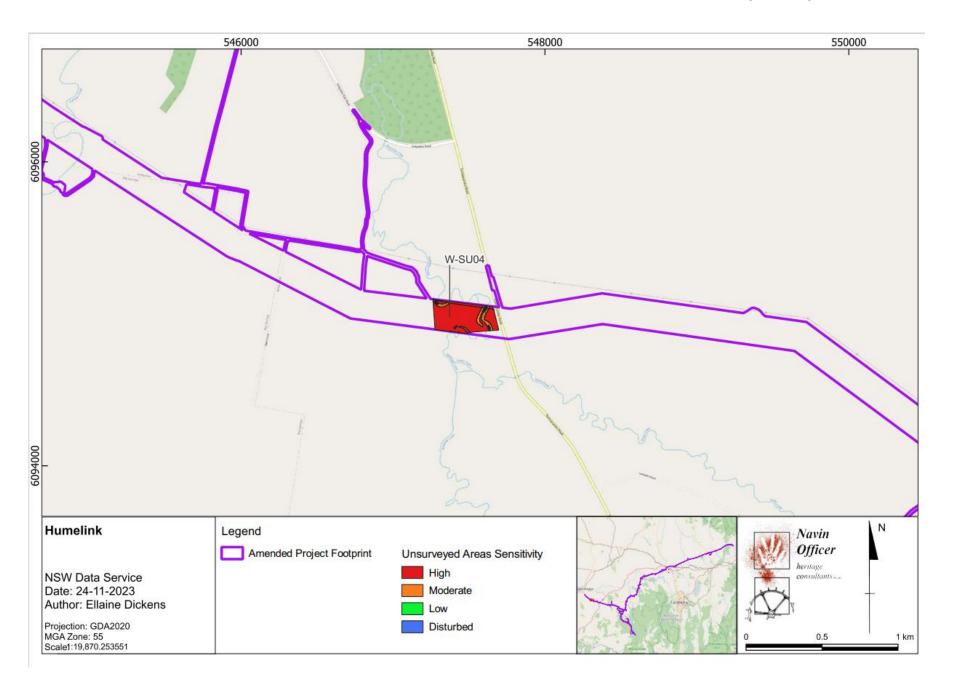
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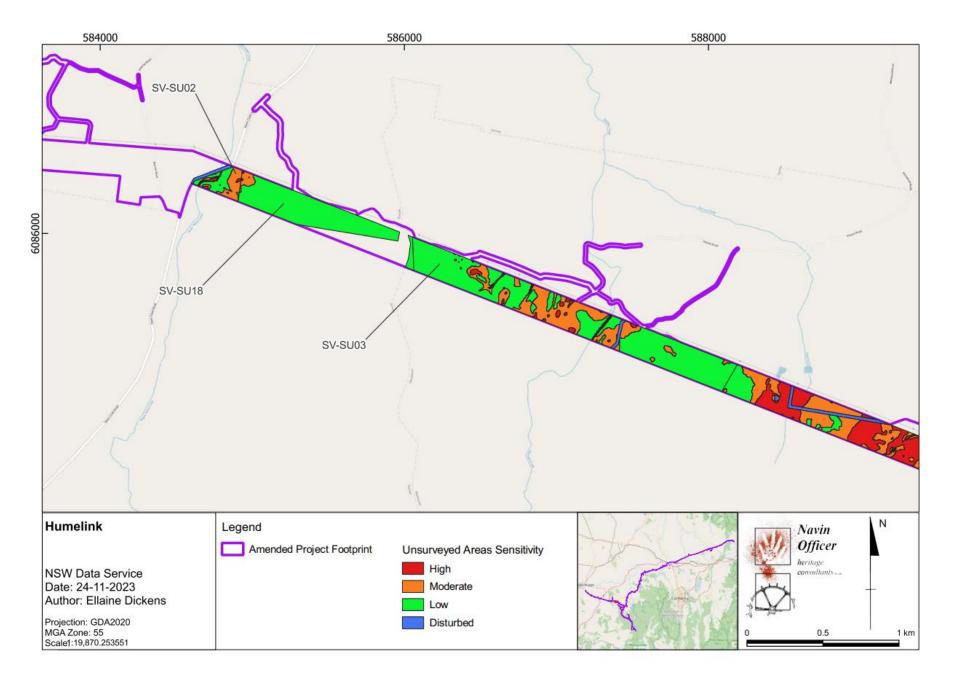




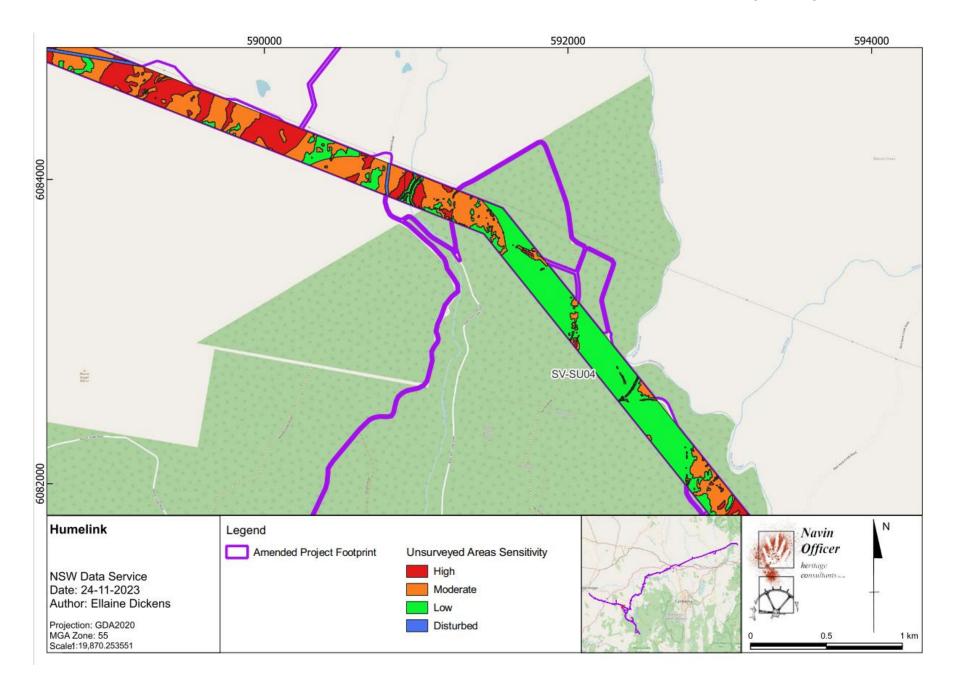




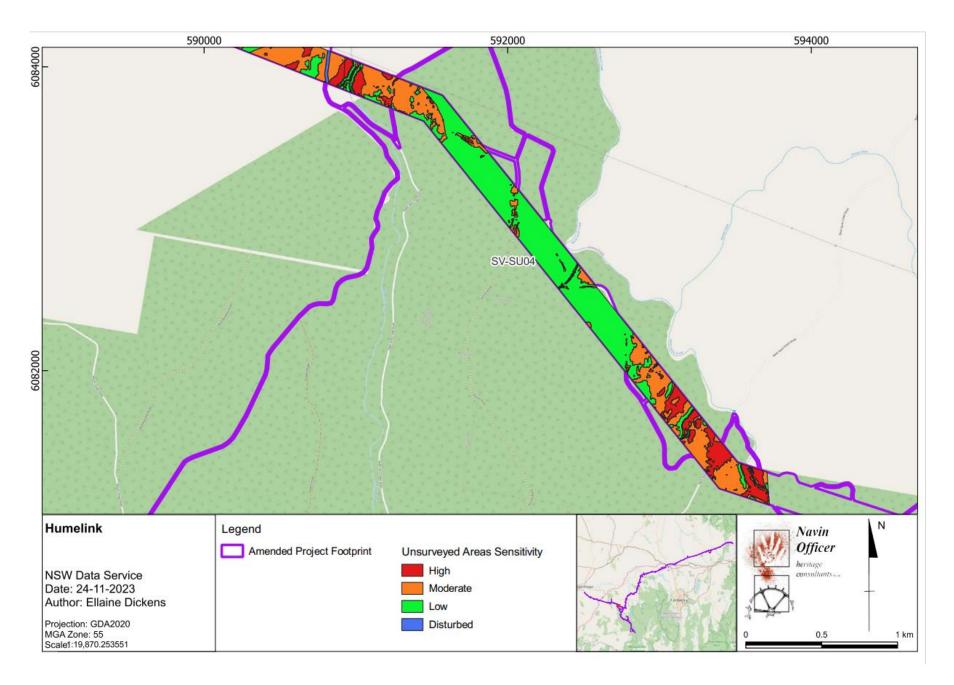




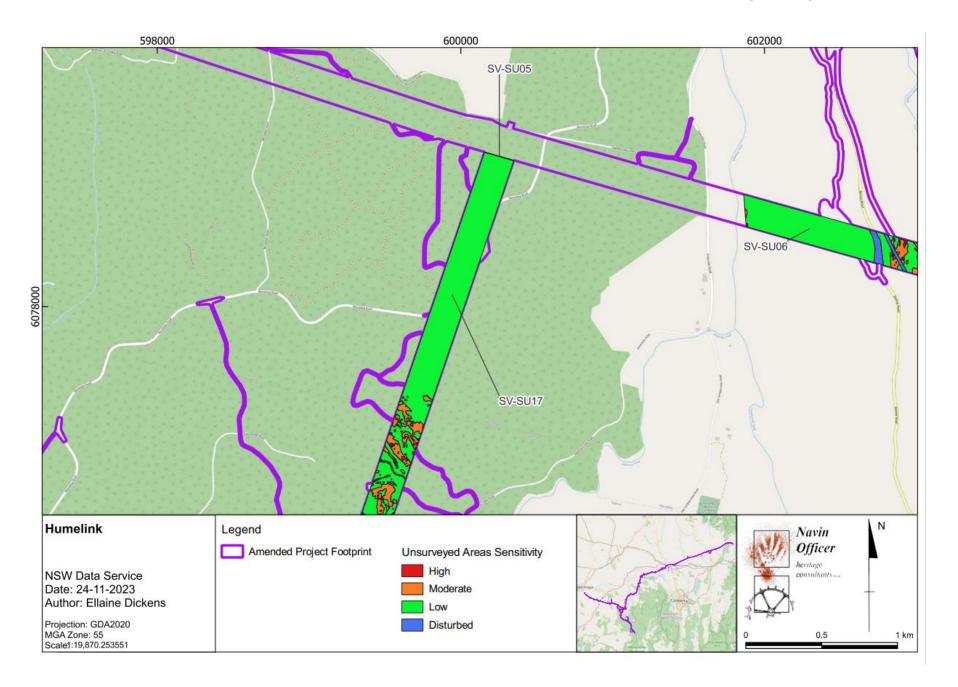




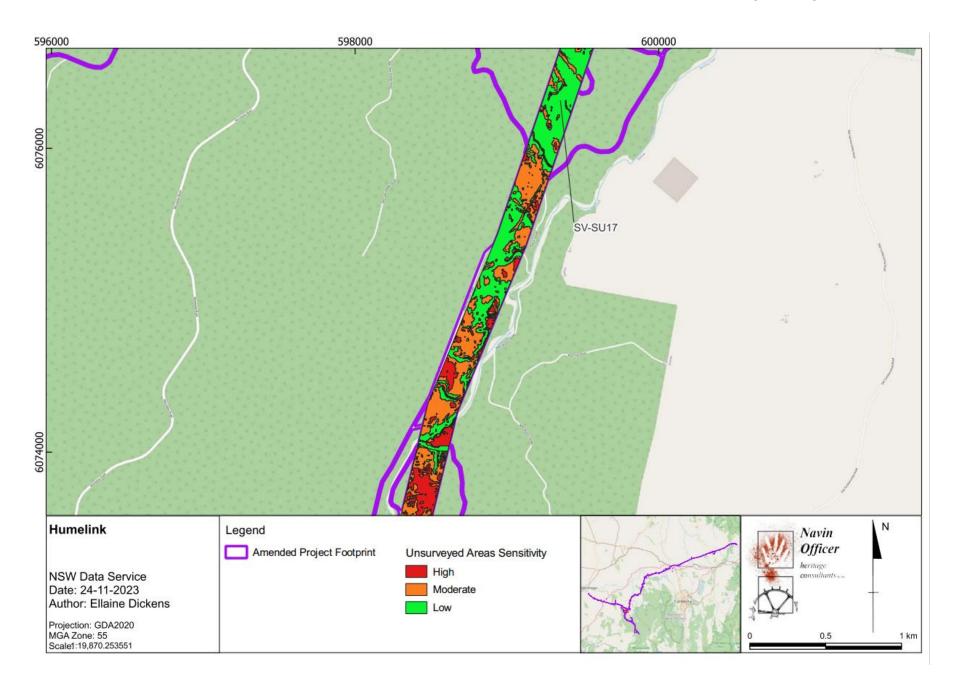




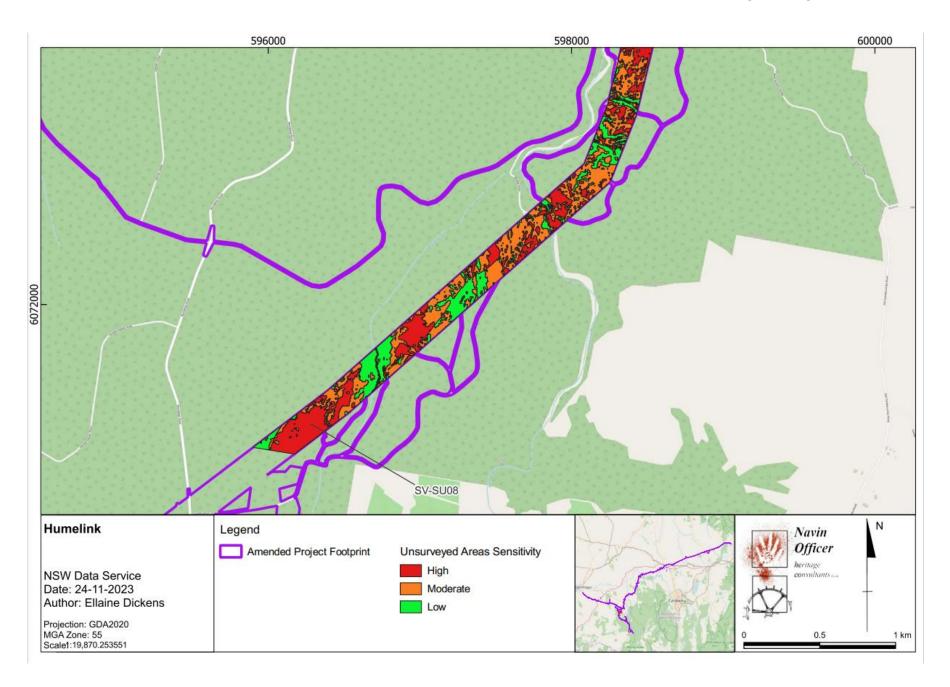




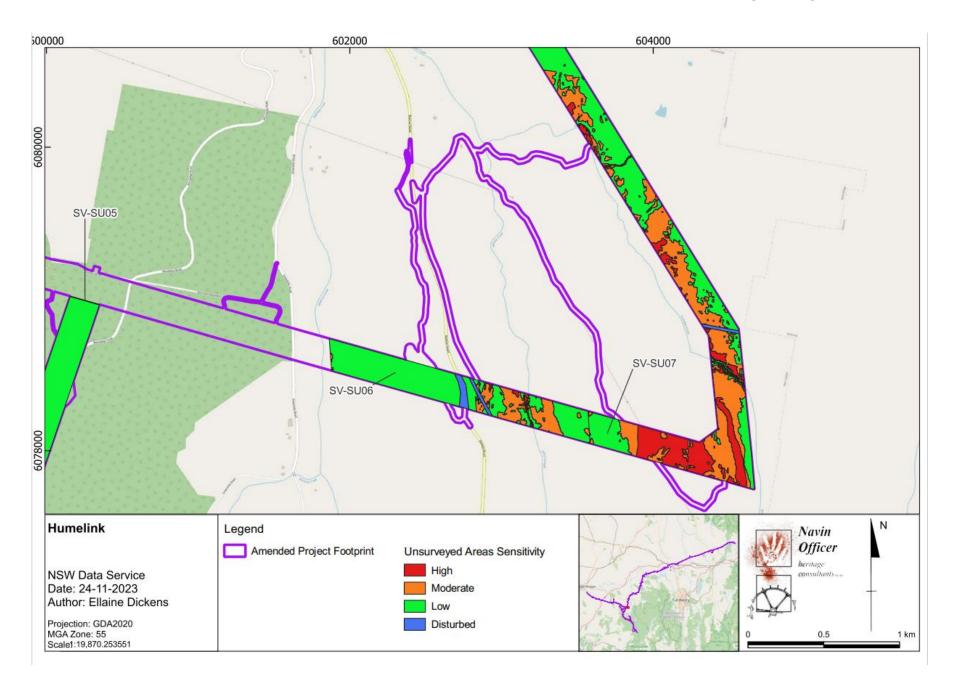












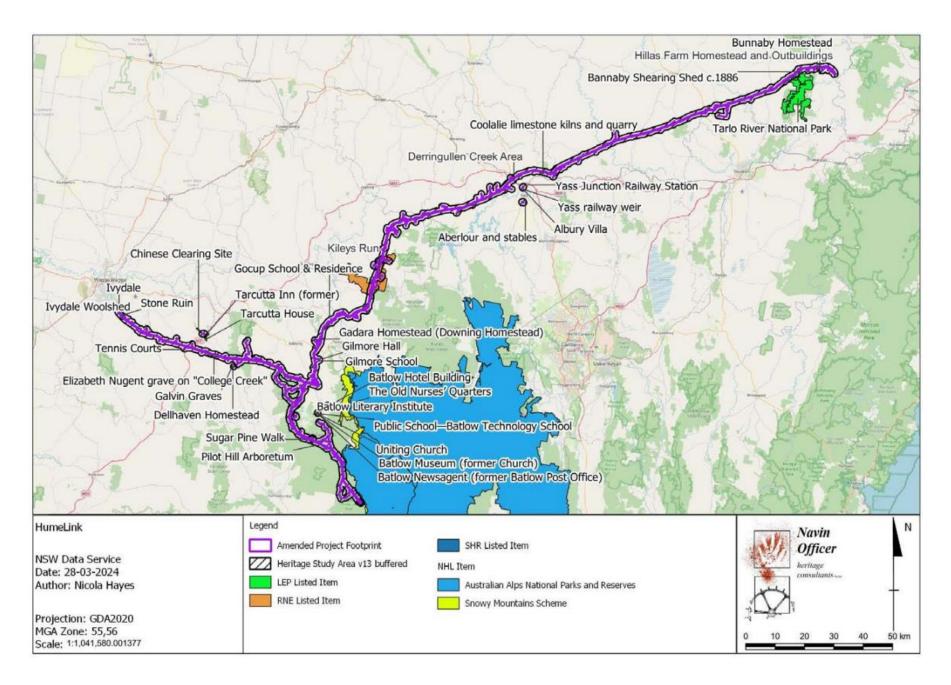


# Annexure F. Location of Non-Aboriginal heritage listed items

The figure below is an extract from HumeLink AR – Technical Report 3 (Figure 3-1, NOHC 2024).







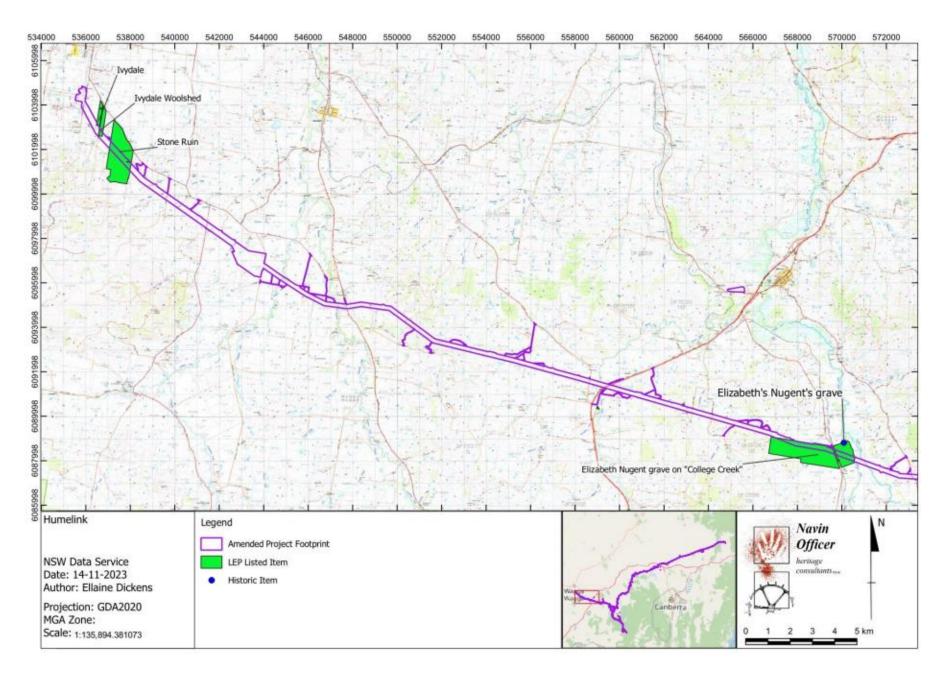


#### Annexure G. HLW Non-Aboriginal heritage items

The figure below is an extract from HumeLink AR – Technical Report 3 (Extract from Figure 8 map series, NOHC 2024).









#### **Annexure H.** Consultation Summary Report





#### **Annexure I.: MCoA Appendix 3 Heritage**

Table 3-1 Aboriginal Heritage items – avoid impacts

AHIMS ID / Site name / area
Pending (HL-82)
Pending (HL-148)
56-6-0569 (HL-09)
51-4-0475 (HL-30)
51-4-0475 (HL-32)
51-6-0974 (HL-121)





Table 3-2 Aboriginal Heritage items – Management and mitigation measures for sites within construction area

AHIMS ID/Site name/ Area (corresponding project site ID)	Site type	Level of harm	Mitigation and management measure
Areas of moderate to high sensitivity (as per updated predictive model)	Area of sensitivity	All or part of this site may be directly or indirectly impacted by the project  Level of harm subject to confirmation pending design finalisation	Investigate micro-siting of the project infrastructure and construction activities to avoid or minimise impacts to sites.  Undertake additional survey and, where impacts cannot be avoided, complete test excavations (where required)
51-6-0949 (HL-62)	Artefact scatter	All or part of this site may be directly or indirectly impacted by the project Level of harm subject to confirmation pending design finalisation	Investigate micro-siting of the project infrastructure and construction activities to avoid or minimise impacts to sites.  Where impacts cannot be avoided, undertake surface collection and salvage excavation (as required).
51-5-0375 (HL-39)	Isolated find	All or part of this site may be directly or indirectly impacted by the project Level of harm subject to confirmation pending design finalisation	Investigate micro-siting of the project infrastructure and construction activities to avoid or minimise impacts to sites. Where impacts cannot be avoided, undertake surface collection and salvage excavation (as required).
Pending (HL-76) Pending (HL-84) Pending (HL-149)	Cultural tree	All or part of this site may be directly or indirectly impacted by the project Level of harm subject to confirmation pending design finalisation	Investigate micro-siting of the project infrastructure and construction activities to avoid or minimise impacts to sites.
51-5-0201 (Dalton 8) 51-5-0253 (Gullen Solar Farm 12) 51-5-0254 (Gullen Solar Farm 13) 51-5-0330 (RPWF IF 2) 51-5-0335 (RPWF AFT 1 + PAD) 51-6-0714 (Hillview Park) 51-6-0718 (Hillview Park) 51-6-0811 (PJ58) 51-6-0899 (Crookwell WF12) 51-6-0899 (Crookwell WF23) 52-1-0152 (Bannaby 1) 52-1-0272 (BA1 (Bannaby Substation)) 52-1-0273 (BA2 (Bannaby Substation)) 52-1-0279 (BA6 (Bannaby Substation)) 52-1-0280 (BA9 (Bannaby Substation)) 52-1-0280 (BA9 (Bannaby Substation)) 52-1-0281 (BA10 (Bannaby Substation))	Artefact scatter	All or part of this site may be directly or indirectly impacted by the project Level of harm subject to confirmation pending design finalisation	Investigate micro-siting of the project infrastructure and construction activities to avoid or minimise impacts to sites.  Where impacts cannot be avoided, undertake surface collection and salvage excavation (as required).







AHIMS ID/Site name/ Area	Cite tune	Level of harm	Mid-entire and management management
	Site type	Level of narm	Mitigation and management measure
(corresponding project site ID)	3		
56-3-0235 (Kylies Run Redhill)			
56-3-0288 (Kylies Run/Roberts Rd)			
56-6-0143 (BM-OS-1)			
56-6-0152 (BSF-OS J68)			
56-6-0153 (BSF-OS-2 J26)			
56-6-0177 (Logbridge creek - 1F-1 - J43)			
56-6-0180 (Logbridge Ck-1F-3 - J46)			
56-6-0181 (BSF-OS-1)			
56-6-0273 (BSF-IF-34/PAD J174)			
56-6-0301 (LBC-IF-11 (J190))			
56-6-0302 (LBC-IF-10 (J189))			
56-1-0729 (HL-01)			
56-1-0730 (HL-02)			
51-4-0468 (HL-29)			
51-4-0469 (HL-33)			
51-5-0368 (HL-37)			
51-5-0369 (HL-38)			
51-5-0365 (HL-43)			
51-5-0364 (HL-44)			
51-5-0363 (HL-46)			
51-5-0366 (HL-51)			
51-6-0946 (HL-59)			
51-6-0948 (HL-66)			
51-6-0945 (HL-72)			
56-3-0285 (HL-90)			
50-6-0318 (HL-91)			
50-6-0317 (HL-91)			
51-5-0384 (HL-96)			
56-3-0284 (HL-100)			
56-1-0742 (WAS02-1)			
56-3-0299 (SVAS03)			
51-4-0493 (YAS01)			
51-4-0494 (YAS02) 51-4-0492 (YAS04)			
51-5-0393 (ULAS02)			
51-5-0392 (ULAS03)			
51-5-0394 (ULAS04)			
51-5-0984(ULAS05)			
51-5-0385 (HL-92)			
56-6-0571 (HL-97)			
56-6-0570 (HL-99)			
51-5-0382 (HL-102)			
56-6-0567 (HL-104)			
50-6-0319 (CGAS04)			





AHIMS ID/Site name/ Area (corresponding project site ID)	Site type	Level of harm	Mitigation and management measure
56-3-0279 (HL-20)			
56-2-0328 (HL-113)			
51-6-0979 (HL-115)			
51-6-0980 (HL-116)			
56-2-0322 (HL-123)			
51-4-0480 (HL-150)			
51-4-0481 (HL-151)			
56-3-0278 (HL-19)			
51-6-0950 (HL-56)			
56-2-0326 (HL-107)			
56-2-0327 (HL-111)			
51-6-0978 (HL-114)			
51-3-0099 (HL-63)			
56-2-0321 (HL-122)			
56-2-0325 (HL-112)			
51-6-0951 (HL-60)			
56-3-0277 (HL-18)			
51-4-0490 (HL-119)			
51-4-0491 (HL-120)			
51-4-0489 (HL-118)			
51-6-0976 (HL-125)			
51-4-0473 (HL-73)			
56-6-0584 (HL-108)			
51-3-0112 (HL-117)			
51-6-0975 (HL-124)			
56-1-0731 (HL-03)	Isolated find	All or part of this site may be	Investigate micro-siting of the project infrastructure and
56-2-0313 (HL-04)		directly or indirectly impacted by	construction activities to avoid or minimise impacts to sites.
56-2-0314 (HL-05)		the project	Where impacts cannot be avoided, undertake surface collection.
56-2-0316 (HL-08)		Level of harm subject to	
56-3-0273 (HL-21)		confirmation pending design	
50-6-0315 (HL-22)		finalisation	
50-6-0316 (HL-23)		State of the street and the street a	
51-4-0463 (HL-25)			
51-4-0464 (HL-26)			
51-4-0466 (HL-27)			
51-4-0467 (HL-28)			
51-4-0472 (HL-31)			
51-4-0470 (HL-34)			
51-4-0471 (HL-35)			
51-4-0476 (HL-36)			
51-5-0376 (HL-40)			
51-5-0370 (HL-41)			
51-5-0372 (HL-45)			
51-5-0362 (HL-47)			
51-5-0374 (HL-48)			





AHIMS ID/Site name/ Area	Site type	Level of harm	Mitigation and management measure
(corresponding project site ID)			
51-5-0373 (HL-49)			
51-5-0367 (HL-50)			
51-5-0379 (HL-53)			
51-5-0371 (HL-55)			
51-6-0947 (HL-61)			
51-3-0097 (HL-64)			
51-4-0465 (HL-67)			
56-3-0271 (HL-68)			
56-3-0272 (HL-70)			
56-2-0312 (HL-71)			
51-5-0360 (HL-87)			
51-5-0361 (HL-89)			
51-4-0477 (HL-94)			
56-2-0320 (HL-95)			
51-5-0386 (HL-98)			
51-5-0383 (HL-101)			
56-2-0323 (HL-126)			
56-2-0324 (HL-127)			
56-6-0578 (HL-128)			
56-6-0579 (HL-129)			
56-6-0580 (HL-130)			
56-6-0581 (HL-131)			
56-6-0582 (HL-132)			
56-3-0295 (HL-133)			
56-3-0296 (HL-134)			
51-3-0110 (HL-136)			
51-3-0111 (HL-137)			
56-6-0583 (HL-138)			
56-3-0297 (HL-139)			
51-3-0108 (HL-140)			
51-3-0109 (HL-141)			
56-6-0577 (HL-145)			
56-3-0294 (HL-146)			
51-6-0973 (HL-147)			
51-4-0482 (HL-152)			
51-4-0483 (HL-153)			
51-4-0484 (HL-154)			
51-4-0485 (HL-155)			
52-2-0329 (WAS03)		Annual Control of the	
51-6-0972 (HL-143)	Isolated Find and Charcoal Stain	All or part of this site may be directly or indirectly impacted by the project Level of harm subject to confirmation pending design	Investigate micro-siting of the project infrastructure and construction activities to avoid or minimise impacts to sites.  Where impacts cannot be avoided, undertake surface collection.
		finalisation	





AHIMS ID/Site name/ Area (corresponding project site ID)	Site type	Level of harm	Mitigation and management measure
56-6-0262 (BSF-05-46/PAD (J195))	Modified tree/PAD	All or part of this site may be directly or indirectly impacted by the project Level of harm subject to confirmation pending design finalisation	Investigate micro-siting of the project infrastructure and construction activities to avoid or minimise impacts to sites. Where impacts cannot be avoided, undertake surface collection and salvage excavation (as required).
Pending (HL-PAD-01) Pending (HL-PAD-02) Pending (HL-PAD-03) Pending (HL-PAD-05) Pending (HL-PAD-06) Pending (HL-PAD-07) Pending (HL-PAD-10) Pending (HL-PAD-11) 56-6-0263 (BSF-05-46 (J193)) 56-6-0300 (LBC-IF-11/PAD (J191)) Pending (HL-PAD-08) Pending (HL-PAD-09)	PAD	All or part of this site may be directly or indirectly impacted by the project Level of harm subject to confirmation pending design finalisation	Investigate micro-siting of the project infrastructure and construction activities to avoid or minimise impacts to sites. Where impacts cannot be avoided, undertake surface collection and salvage excavation (as required).  Where impacts cannot be avoided, undertake surface collection and test excavations, and where required, salvage excavations.
HL-75 HL-80 HL-81 HL-83	Cultural tree	All or part of this site may be directly or indirectly impacted by the project Level of harm subject to confirmation pending design finalisation	Investigate micro-siting of the project infrastructure and construction activities to avoid or minimise impacts to sites.
51-4-0495 (Derringullen Creek Women's site)	Cultural site	Part of this site may be directly or indirectly impacted by the project  Partial harm - Level of harm subject to confirmation pending design finalisation	Investigate micro-siting of the project infrastructure and construction activities to avoid or minimise impacts to sites.  Where impacts cannot be avoided, additional consultation with the Registered Aboriginal Parties must be undertaken
56-2-0315 (HL-07) 56-6-0569 (HL-14) 56-6-0566 (HL-15) 52-1-0415 (HL-65) 51-5-0381 (HL-06)	Modified tree	All or part of this site may be directly or indirectly impacted by the project Level of harm subject to confirmation pending design finalisation	Investigate micro-siting of the project infrastructure and construction activities to avoid or minimise impacts to sites.  Where impacts cannot be avoided, additional consultation with the Registered Aboriginal Parties must be undertaken.
HL-144	Areas of Charcoal Staining	All or part of this site may be directly or indirectly impacted by the project Level of harm subject to confirmation pending design finalisation	Nil
HL-74 HL-77 HL-78	Modified tree, not of Aboriginal origin	All or part of this site may be directly or indirectly impacted by the project	Nil





AHIMS ID/Site name/ Area (corresponding project site ID)	Site type	Level of harm	Mitigation and management measure
HL-79 HL-85 HL-86		Level of harm subject to confirmation pending design finalisation	
51-6-0720 (HP7) 51-6-0871 (CWF7) 51-6-0872 (CWF6) 51-6-0880 (CWF11) 51-6-0881 (CWF10) 51-6-0888 (CWF8) 51-6-0889 (CWF9) 51-6-0902 (CWF21)	Artefact	Indicated as destroyed by AHIMS; no additional impact from this project	Nil





Table 3-3 Historic Heritage items – avoid impacts

Item name
Ivydale Woolshed
Stone ruin
Elizabeth Nugent grave on College Creek
Kiley's Run

Table 3-4 Historic Heritage items – avoid, minimise and/or salvage

Item name
Historic Site 1: Sheep dip and well
Historic Site 2: Chimney
Historic Site 3: Chimney
Historic Site 4: Modified tree 2