



**Broken Hill BESS: Battery Storage Facility (Stage 1) Heritage
Management Plan**

Valmec Pty Ltd

DOCUMENT TRACKING

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Template 2.8.1

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Definitions

The following definitions apply for the purpose of this plan:

Term	Definition
Aboriginal Stakeholders	Aboriginal stakeholders registered for cultural heritage consultation for the development.
ACHAR	Aboriginal Cultural Heritage Assessment Report
Artefacts	Fossils, human remains, artefacts, valuable minerals and other things of scientific, geological, historical or archaeological significance or Aboriginal origin.
BHLALC	Broken Hill Local Aboriginal Land Council.
BESS	Battery Energy Storage System
CEMP	Contract Environmental Management Plan.
Competent	Ability to apply knowledge and skills to achieve intended results from operational experience and education.
Conformity	Fulfilment of a requirement (ie. EIS, Development Consent, EPCC, and CEMP).
DC	Development Consent as required by the Minister for Planning and Public Open Spaces and Section 4.38 of the Environmental Planning & Assessment Act 1979.
DECCW	Department of Environment, Climate Change and Water (now Heritage NSW)
EIS	The Environmental Impact Statement for Broken Hill Battery Storage System
Environment	Surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans and their interrelationships.
Environmental Aspect	An element of an organisation's activities, products, and services that interact with the environment. These can include discharges to water, emissions to air, waste and use of natural resources and materials.
Environmental Impact	Any change to the environment, whether adverse or beneficial, resulting from a facility's activities, products, or services (the effect that people's actions have on the environment).
EPC	Engineer Procure Construct Contract.
Heritage NSW	Heritage NSW division within Department of Planning and Environment.
Heritage Item	An item as defined under the <i>Heritage Act 1977</i> and / or an Aboriginal Object or Aboriginal Place as defined under the <i>National Parks and Wildlife Act 1974</i> .
Incident	Occurrence arising out of or in the course of work that could or does result in death, injury or ill-health, or equipment or environmental damage. <ul style="list-style-type: none"> • 'Accident' refers to incidents incurring injury, ill health, damage or harm. • 'Near-miss' refers to incidents not incurring injury, ill health, damage or harm but have the potential to do so.
JHEA	Job Hazard Environmental Analysis
Material harm	Is harm that: <ul style="list-style-type: none"> • involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; • results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment)

Term	Definition
Minimise	Implement all reasonable and feasible mitigation measures to reduce the impacts of the development.
NSWALC	NSW Aboriginal Land Council.
Non-compliance	An occurrence, or development that is a breach of this Soil and Water Management Plan but is not an incident.
Non-conformity	Non-fulfilment of a requirement (ie. EIS, Development Consent, EPCC, and CEMP).
OEH	Office of Environment and Heritage (now Heritage NSW).
RAP	Registered Aboriginal Party.
Reasonable	Reasonable relates to the application of judgement in arriving at a decision, taking into account: mitigation benefits, cost of mitigation versus benefits provided, community views and the nature and extent of potential improvements.
Significant Environmental Aspect	An Environmental aspect that has significant characteristics in terms of risk impact (ie. Legal requirement, protected species, habit, licence conditions), and if not controlled can cause a significant impact (ie. Pollution, degradation, environmental harm, prosecution, breach, non-compliance and or non-conformity).

Approval mapping

Development Consent Sections	Heritage Management Plan References
<p>Protection of Heritage Items</p> <p>18. The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items located outside the approved development footprint.</p>	<p>Section 2.6 Impacts to archaeological sites outside the approved development footprint</p>
<p>Heritage Management Plan</p> <p>19. Prior to carrying out any development the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary.</p> <p>This plan must:</p> <ul style="list-style-type: none"> (a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Planning Secretary; (b) be prepared in consultation with Heritage NSW and Aboriginal Stakeholders; (c) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> • a contingency plan and reporting procedure if: <ul style="list-style-type: none"> - previously unidentified heritage items are found; or - Aboriginal skeletal material is discovered; • ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; • relocating the Aboriginal heritage items located with the approved development footprint, as identified in Appendix 5. • ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and (d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project. <p>Following the Planning Secretary’s approval, the Applicant must implement the Heritage Management Plan.</p>	<p>Section 1.2 Development Consent Approval (see also Appendix 1)</p> <p>Section 1.3 Consultation with Aboriginal Stakeholders and Heritage NSW (see also Appendix 2 and 4)</p> <p>Section 2.2 Preparation of Heritage Management Plan</p> <p>Section 2.5. Management of the BESS-AS-21 site</p> <p>Section 2.7 Aboriginal Objects Find Procedure</p> <p>Section 2.7.4 Human skeletal remains</p> <p>Section 2.4 Induction and Training</p> <p>Section 2.8 Ongoing consultation with the Aboriginal community</p> <p>Section 2.9 Site Management Monitoring</p> <p>Section 2.10 Environmental performance indicators</p> <p>Section 2.11 Environmental Aspects Risk Matrix</p>

1. Introduction

1.1. Project background

Valmec Pty Ltd have been engaged by Fluence Energy Pty Ltd (Fluence) and AGL Macquarie Pty Ltd (AGL) to develop a Battery Energy Storage System (BESS) with a capacity of approximately 50 megawatts (MW) and 50 megawatt-hour (MWh). The Project will provide a range of network services to augment the reliability of energy supply at Broken Hill. The Project would also provide storage and firming capacity to the National Energy Market (NEM) as well as additional services to assist grid stability including frequency control ancillary services.

The proposed location of the BESS (the Site) is on two lots at 74 to 80 Pinnacles Place, Broken Hill, 2880 (Lots 57 and 58 of DP 258288). Works within the Battery Storage Facility are covered by this Heritage Management Plan and comprise Stage 1 of the BESS project.

The Project will also involve the installation of a High Voltage Power Easement between the Site and the nearby TransGrid Broken Hill substation, which would traverse part of Lot 7302 DP1181 and Lot 2 DP 1102040. Works within the High Voltage Power Easement are covered by a separate Heritage Management Plan.

1.2. Development Consent Approval

The Heritage Management Plan has been aligned with the Development Consent Approval (Application Number SSD-11437498) under Section 4.38 of the *Environmental Planning & Assessment Act 1979* which has been authorised by the Minister for Planning and Public Spaces and is registered as the Broken Hill Battery Storage System (BESS) Project - Application Number SSD-11437498. The Heritage Management Plan will form part of the Construction Environmental Management Plan, which includes further controls for environmental aspects and potential impacts for the BESS project.

The Development Consent was designed against an initial Environmental Impact Statement (EIS) and assesses the environmental impacts of the project against the activities being conducted also under Section 4.12(8) of the *Environmental Planning and Assessment Act 1979*. The EIS was prepared in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulations 2000* and included an Aboriginal Cultural Heritage Assessment Report completed by AECOM (2021, 2022)

Section 1.3 and Appendix 2 provide additional details regarding consultation with Aboriginal stakeholders and Heritage NSW.

The Development Consent specifically outlines that a suitably qualified and experienced person be appointed and endorsed to both consult and prepare this plan for the project. A copy of written advice from the Department of Planning and Environment endorsing Eco Logical Australia Principal Archaeologist Tim Hill as a suitably qualified person is provided below (Appendix 1).

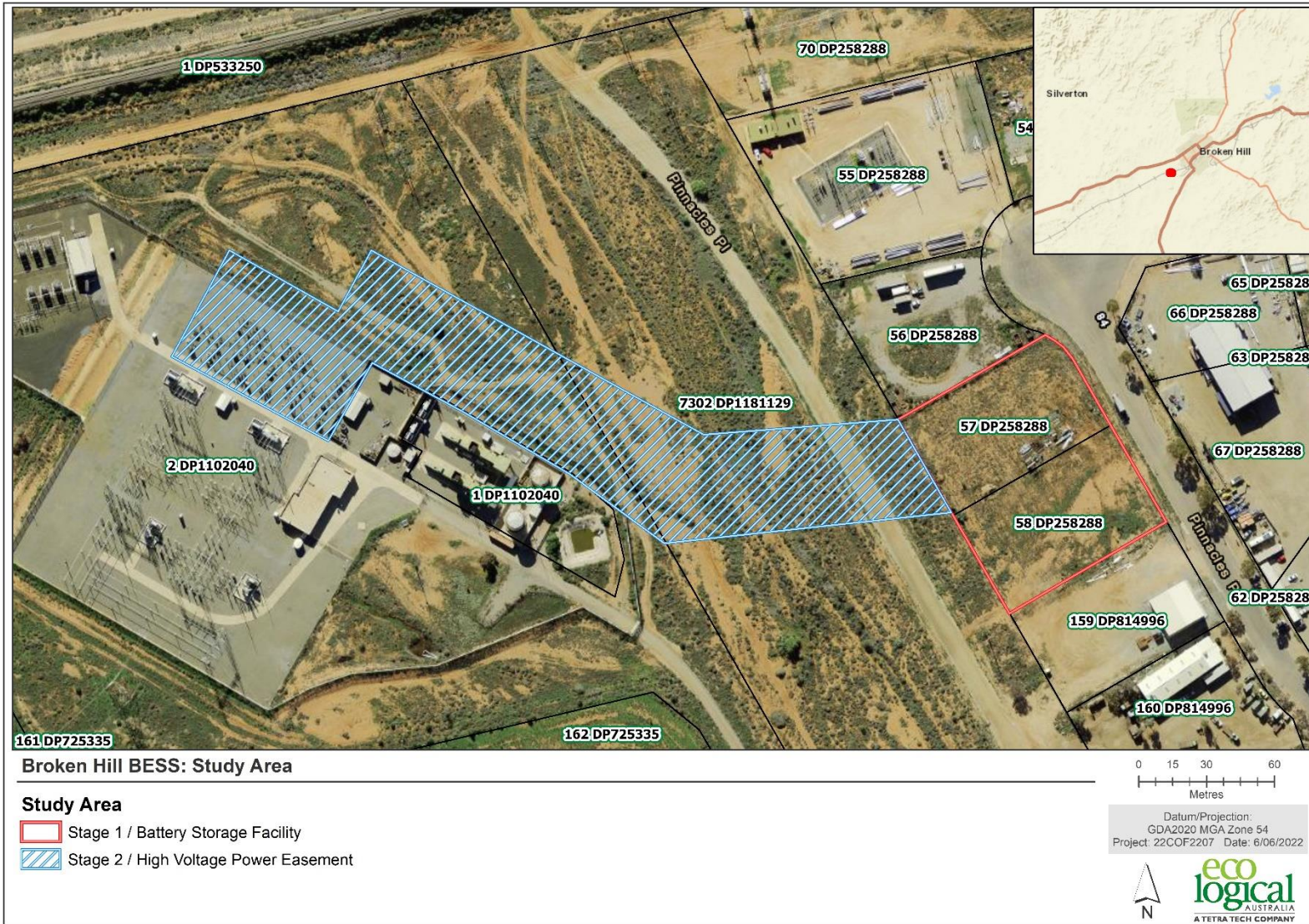


Figure 1-1: Project layout Broken Hill BESS.

1.3. Consultation with Aboriginal Stakeholders and Heritage NSW

The consent requires that the plan is “prepared in consultation with Heritage NSW and Aboriginal Stakeholders”. In addition to the consultation undertaken by AECOM (2021, 2022) to understand the nature, extent and cultural significance of cultural heritage values of the BESS project, the following summarises consultation with Heritage NSW and Aboriginal stakeholders for development of the Heritage Management Plan (see also Appendix 1, 2 and 4)

- An introductory letter was provided to Aboriginal stakeholders on 4 April 2022 to the following Aboriginal stakeholders which provided an opportunity to provide input into the draft heritage management plan. No responses were received from the RAPs and it was considered that there were no objections to the development of the Heritage Management Plan
- A phone call was made to the Aboriginal stakeholders on June 10 to confirm that they still wished to participate in the project and to ensure that email addresses were up to date.
- It was noted that Maureen O’Donnell was not well and asked that her daughter Joanne O’Donnell receive all correspondence or phone calls regarding the project.
- Maeve Parker from NTSCorp noted that the Barkindji Aboriginal Corporation did not have a Chief Executive Officer in place and recommended that all correspondence go through the Chairperson and Deputy Chair
- A copy of the Heritage Management Plan was issued to Aboriginal stakeholders on June 10 (see Appendix 2) with a request for comment by close of business 27 June 2022
- A meeting invitation was forwarded to RAPs and Heritage NSW on June 13. This meeting was undertaken between the hours of 8:30 and 11:30am however no representatives attended the meeting
- Based on feedback from Broken Hill LALC on the availability of members due to work commitments an additional meeting invitation by Microsoft Teams for the evening of Wednesday 22 June was forwarded to RAPs on 17 June 2022. This meeting was held between 6.30 and 7.30 pm however no RAPs attended
- A response was received from Andrew Whitton from Heritage NSW via email on 22 June. These are provided in Appendix 4
- Phone calls were made with RAPs on Thursday 23 June to seek additional comments or opportunities for discussion. Messages were left with Broken Hill LALC, Cally Doyle and Maeve Parker (NTSCorp)
- Joanne ODonnell noted that Aunty Maureen was taken to Adelaide Hospital on the weekend preceding the meeting and as such none of the Wilyakali Board members were able to attend. However, Joanne noted that the consultation and site investigation undertaken by AECOM was extensive and the community generally understood the site and the management of the site very well
- Joanne noted that the power easement included land that was under Aboriginal Land Claim and this was discussed in some detail. It was noted that the easement may restrict use for some future activities but would not affect the title of the land, and
- No written submissions were received by close of business on 27 June and the plan was finalised on this basis.

A review of the effectiveness of the consultation was undertaken to assess whether additional consultation was required. The following comments summarise the issues around the consultation process:

- The RAPs had been previously engaged in the assessment as part of the AECOM (2021, 2022) investigations and had previously identified the main management and mitigation issues
- The BESS-AS21 site is consistent with a number of similar stone artefact scatters in the Broken Hill/ Barrier Range area. The consultation response would likely have been greater if the site included potential impacts to Aboriginal burials or ceremonial sites as examples
- There was a degree of meeting fatigue as several large proposals required consideration by the Aboriginal community, and
- The attendance of community representatives at meetings where payment is not provided is consistently low as most community representatives who actively engage in cultural heritage work have other paid roles.

Amendments to the HMP as a result of the consultation are summarised in Appendix 4.

2. Heritage Management Plan

2.1. Heritage Management Plan Objectives

As a result of the Aboriginal cultural heritage assessment, an Aboriginal stone artefact scatter (the BESS-AS-21 archaeological site) was identified immediately adjacent to part of the Project. This site has been identified as being of low significance and the Aboriginal Cultural Heritage Assessment Report (ACHAR) has made recommendations about the management of the site which have been accepted by RAPs.

The Heritage Management Plan describes how the project will manage the BESS -AS-21 archaeological sites and potential unidentified artefacts within and around the BESS site. The Heritage Management Plan aims to outline the operational controls and mitigation practices to ensure that the cultural values of the sites are managed in a way which retain the value of the site to the Aboriginal community. This includes a framework to include RAPs as part of the BESS project team.

The plan outlines measures to be taken before, during and after an activity to ensure that the BESS project is compliant with its obligations under the development consent.

2.2. Plan Development

The Heritage Management Plan has been developed by ELA Principal Tim Hill, who has been endorsed by the Department of Planning as a suitably qualified and experienced person (see Appendix 1).

The Plan builds on the consultation undertaken by AECOM to develop the ACHAR (2021, 2022) which was developed with the following RAPS and endorsed by the Department of Planning:

- i. Cally Doyle.
- ii. Broken Hill Local Aboriginal Land Council
- iii. Barkindji People #8, and
- iv. Wilyakali Aboriginal Corporation

Valmec notified the following RAPs and Heritage NSW of the commencement of the Heritage Management Plan in writing on 4 April 2022 and provided an opportunity for RAPs to provide any preliminary information or views relevant to the management of Aboriginal cultural values prior to commencement of the drafting of the Heritage Management Plan.

Written Correspondence was sent to the following addresses on 1 April 2022:

The Chairperson
Broken Hill Local Aboriginal Land Council
84 Oxide Street NSW 2880
Australia post tracking number: 02 01004 34134 90060 50992

and

Maureen O'Donnell
Wilyakali Aboriginal Corporation
428 ARGENT ST

BROKEN HILL NSW, 2880

Australia post tracking number: 02 01004 34135 0060 50998

An email was forwarded to NTSCorp solicitor James McLeod as legal representative of the Barkindji #8 Native Title Group (see Appendix 2 for example of correspondence sent to Broken Hill Local Aboriginal Land Council and the email to James McLeod). A phone call was made to James McLeod by ELA Principal Heritage Consultant Tim Hill on 4 April to discuss the project.

Information was not sent to Cally Doyle by mail as a result of a misunderstanding of the consultation process from the AECOM studies, as she was not involved in the onsite works. Once this omission was identified, Cally was included in all future consultation. ELA does not consider that this omission at an introductory stage substantially impacted on Callys involvement in the consultation or compromised the consultation process.

A summary of consultation is provided in section 1.3 (above) and amendments to the plan are summarized in Appendix 4 (below). The changes to the plan as a result of the consultation include:

- Additional measures to mitigate impacts to Aboriginal objects through construction practices including use of exclusion fencing, toolbox meetings and agreement on exclusion fencing
- Clarification of the role of Aboriginal stakeholders as part of the induction process including employment and payment for cultural content
- Clarification of the opportunities for RAPs to agree on additional mitigation measures including scientific analysis
- Inclusion of a process to undertake additional archaeological assessment outside the BESS
- Refinement of the Aboriginal objects find procedure for stone artefacts so that the procedure is consistent with the management of the BESS-AS-21 site, and
- Clarification on the engagement of Aboriginal sites officers during underground trenching works.

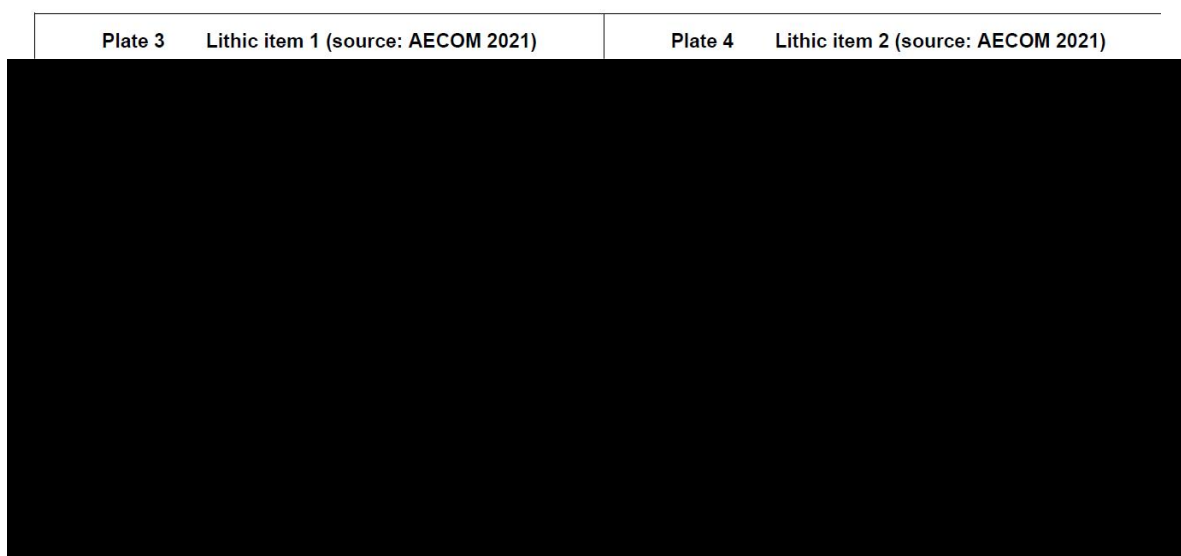
2.3. Understanding of the archaeological values (AECOM 2021, 2022).

AECOM undertook two separate archaeological studies for the BESS project (AECOM 2021, AECOM 2022). The ACHAR included consultation with the Aboriginal community in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DEECW 2010) and it is understood that the ACHAR has been endorsed by RAPs, Heritage NSW and the Department of Planning and Environment.

2.3.1. Battery Storage Facility (AECOM 2021).

The initial study in 2021 included pedestrian transects across the BESS site including an option for overhead connection to the Broken Hill Power Station and did not result in the identification of any archaeological sites. Two possible stone artefacts/ lithics were identified by RAPs the AECOM (2021:44) study concluded “neither item satisfied technical criteria for identification as a stone artefact”. The study further notes that “both were moved by attending RAP field representatives to locations nearby where ground surface impacts would not occur”. The recommendations of the AECOM (2021) ACHAR for the Stage 1 Battery Storage Facility note that temporary fencing should be placed around the two

lithic items- however this is inconsistent with the results section which note that the lithic items have already been relocated by RAPs to a location which is understood to be outside the works footprint.



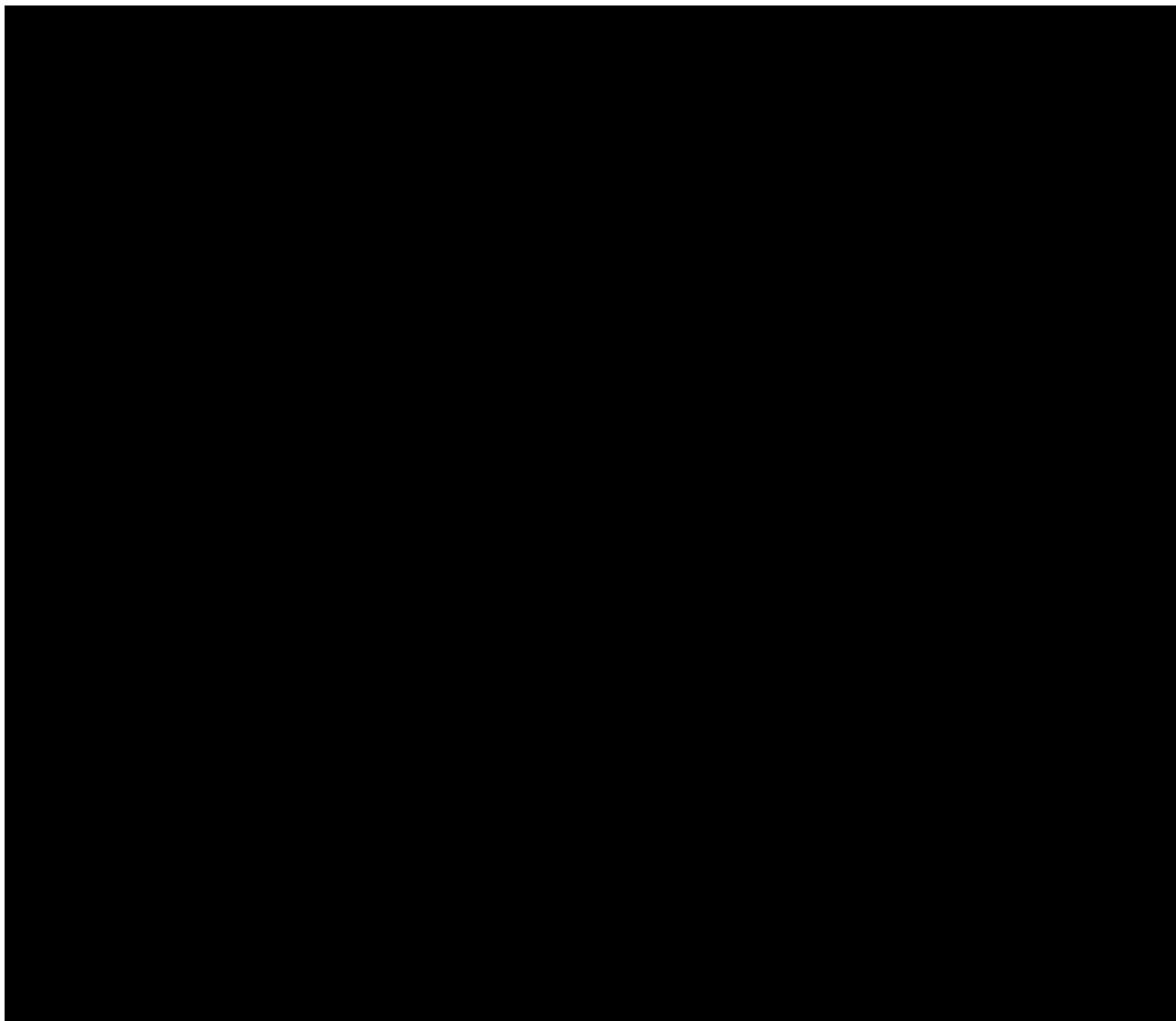
2.3.2. High Voltage Power Easement (AECOM 2022)

A second study was undertaken for a modification proposal to provide for a high voltage underground connection between the Battery Storage Facility (Stage 1) and the power station. This investigation included excavation of archaeological test-pits which resulted in the identification of an Aboriginal archaeological site (BESS -AS-21 (23-4-0691)) to the north of the easement. The participants at the excavations are provided in Table 3 of the ACHAR (AECOM 2022:37, see below).

Organisation	Representative	Position	Date
AECOM	Geordie Oakes	Archaeologist	18-Nov-21
AECOM	Andrew McLaren	Archaeologist	18-Nov-21
AECOM	Rebecca Hibberd	Archaeologist	18-Nov-21
Wilyakali Aboriginal Corporation	Dulcie O'Donnell	Site officer	18-Nov-21
Wilyakali Aboriginal Corporation	Bernie O'Donnell	Site officer	18-Nov-21
BHLALC	Ricky Mann	Site officer	18-Nov-21
BHLALC	Regan O'Donnell	Site officer	18-Nov-21
Barkanndji #8 Native Title Determinants	Christopher Quayle	Site officer	18-Nov-21
Barkanndji #8 Native Title Determinants	Talan Brown	Trainee site officer	18-Nov-21
Barkanndji #8 Native Title Determinants	Bailey Love	Trainee site officer	18-Nov-21

The following describes the BESS -AS-21 (23-4-0691) archaeological site from the Broken Hill Battery Energy Storage System Modification ACHAR (AECOM 2022:46), including

- A summary of the nature and extent of the site
- A plan of the location of the site, and
- A summary of the significance assessment for the BESS -AS- 21 site.



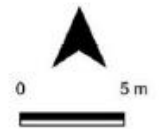


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- Key**
- Modification Area
 - Site
 - Transmission Line
 - TransGrid Broken Hill Substation
 - Watercourses
 - Site Boundary
 - Surface Artefacts

Data Sources:
 1. Roads, Railway, Parks, Drainage, Localities, StreetView Australia © 2014, Pitney Bowes Software
 2. PhotoMap Imagery under license: Neemap 11-2021

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PROJECT ID 60619153
 CREATED BY G.Oakes
 CREATED 22-11-2021
 VERSION 1

Aboriginal Sites

Broken Hill Battery Energy Storage System Project
 ACHAR

Site	Scientific significance ranking	Justification
BESS-AS1-21 (23-4-0691)	Low	<p>Complexity</p> <ul style="list-style-type: none"> • BESS-AS1-21 (23-4-0691) comprises 11 surface artefacts. • Test excavation completed in close proximity to the site did not identify subsurface archaeological deposit. • Locally and regionally common artefact types (i.e., scraper, complete flakes, flake shatter etc.). • One formed object identified (sensu Moore 2000) comprising a retouched flake (scraper). • Locally and regionally common raw materials (i.e., silcrete and quartz). <p>Integrity</p> <ul style="list-style-type: none"> • The site is considered in poor condition being located above a trench excavated for underground service utilities. <p>Deposit character</p> <ul style="list-style-type: none"> • Archaeological deposit not anticipated to be associated with the site. <p>Rarity and representativeness</p> <ul style="list-style-type: none"> • Surface artefact scatter sites are a locally and regionally common site type. • BESS-AS1-21 (23-4-0691) is a poor example of its type. Surface artefact sites with greater integrity/artefact counts/richness are known on a local and regional scale and offer comparable/higher research potential.

The ACHAR identified relocation of artefacts as the primary management response to mitigate impacts from the BESS to the BESS-AS-21 site:

Considering the nature, condition and significance of the site, mitigation has been restricted to movement only with further archaeological excavation or conservation not recommended. In making this recommendation, AECOM notes the following:

- The site has been assessed as of low scientific significance
- The site comprises low densities of archaeological material that are common in the region
- The site has limited research potential, and
- The site is in poor condition having been disturbed by installation of underground utilities.

For BESS-AS1-21 (23-4-0691) movement of the artefacts to a safe location nearby prior to any construction works is considered appropriate mitigation. This mitigation was proposed by RAPs participating in the fieldworks and is supported by AECOM. Movement of the artefacts prior to impact is considered to result in a partial loss of value of the site with its original context being destroyed but with the objects themselves not impacted. (AECOM 2022:59)

Given the location of the known artefacts the Battery Storage Facility Heritage Management Plan considers that the site will be avoided. As such no specific management measures are provided in this Heritage Management Plan for the BESS-AS-21 archaeological site.

2.4. Induction and Training

On mobilisation all staff, workers (including contractors and visitors) shall undergo training as part of their onsite approval conditions, which will include the importance of Aboriginal and cultural heritage management and operational controls within this plan, inclusive of roles and responsibilities.

Early works contractors are identified as having the greatest risk of impacting Aboriginal archaeological sites as they will primarily be responsible for works affecting the ground surface and topsoils with the potential to contain Aboriginal archaeological sites. This includes workers responsible for fencing and erosion control measures around the known extent of the BESS-AS-21 site.

Early works contractors will be provided an induction with representatives of the Aboriginal stakeholders to assist them to identify the recorded site and identify artefacts on the ground prior to or during early works. This training will be delivered onsite and sites officers will be remunerated as sub-contractors in accordance with agreed hourly rates.

Fluence will support Aboriginal stakeholders to participate the inductions. This may include additional cultural content that the Aboriginal stakeholders consider relevant to the management of Aboriginal heritage. The Aboriginal stakeholders may be remunerated for this content. All cultural and intellectual associated with this additional material will be retained by the Aboriginal stakeholders unless otherwise agreed.

The minimum requirements of the induction include:

- An introduction to the Aboriginal people and cultural significance of Broken Hill and the BESS site and the objectives of the Heritage Management Plan (see section 2.1 and section 2.2 above)
- A description of the BESS-As-21 site including identification of Aboriginal stone artefacts (See Section 2.3 above)
- Mitigation and management measures for the BESS -AS-21 site (see section 2.5 below), and
- A summary of the Unexpected Find Procedure (see section 2.7 below).

An induction record, including induction documents, will be retained by contractors and may be made available if requested by the Department of Planning or Heritage NSW.

2.5. Management of the BESS-AS-21 site

Given the location of the known artefacts the Heritage Management Plan considers that the site can be substantially avoided by the implementation of design and construction amendments. The primary mitigation measures for the known extent of the site (See Appendix 3) include:

- Cultural site inductions for all staff and contractors working in close proximity to the BESS-AS-21 archaeological site
- Pre works survey with RAPs to confirm the extent of the archaeological site
- Installation of construction/exclusion fencing under the supervision of RAPs
- Installation of erosion control measures, including sediment fences, under the supervision of RAPs
- High resolution photography of the known extent of artefacts to document change over time during the construction phase and at close out of the construction period

- Inclusion of the extent of the site on all construction and CEMP drawings, and
- Inclusion of the works requirements around the BESS-AS-21 site in toolbox meetings.

In accordance with the AECOM Modification ACHAR all stone artefacts within the approved development footprint shall be relocated into the BESS-AS-21 site extent (see Appendix 3). At the completion of the relocation an Aboriginal Site Impact Recording Form (ASIRF) shall be submitted to the Aboriginal Heritage Information Management System (AHIMS) to provide a primary document of the relocation of artefacts.

2.6. Impacts to archaeological sites outside of the approved development footprint

It is noted that the AECOM (2021 and 2022) investigations were primarily restricted to the development footprint and areas immediately adjacent to the development footprint. As such there is limited knowledge of the potential for harm around the BESS site. Measures to mitigate harm to unknown Aboriginal sites around the approved development footprint include:

- Installation of exclusion fencing
- Installation of erosion control measures, and
- Monitoring, reporting and remediation of visible signs of trampling from native or introduced wildlife around the exclusion fencing.

2.6.1. Previously recorded lithic items

The two lithic items recorded and relocated by the AECOM (2021) archaeological survey are understood to no longer be within the Stage 1 works area, having been moved by Aboriginal sites officers during the initial archaeological survey. Measures to mitigate harm to these items include:

- Installation of exclusion fencing
- Installation of erosion control measures, and
- Monitoring, reporting and remediation of visible signs of trampling from native or introduced wildlife around the exclusion fencing.

However, should movement by Aboriginal sites officers to the BESS – AS1-21 site be considered an appropriate management response this relocation should be documented via an AHIMS Aboriginal Site Impact Record Form (ASIRF). Should this be the case the above measures would not be required.

2.7. Aboriginal objects find procedure.

2.7.1. Pre-works survey

At the commencement of early works within the BESS representatives of RAPs should be engaged to undertake a survey of the BESS site to identify any Aboriginal archaeological sites visible on the ground surface to support the implementation of the Aboriginal objects find procedure. Successful completion of the pre-clearance survey may include provision of the following:

- training to Aboriginal sites officers including identifying appropriate employment as contractors or casual staff on the BESS project team

- support for Aboriginal sites officers to understand the Heritage Management Plan to ensure that they have the capacity to support the Aboriginal objects find procedure, including an understanding of reporting procedure
- the engagement of a qualified archaeologist to provide technical support for the pre-works survey
- engage representatives of the RAPs to undertake a final inspection of the BESS at the completion of construction activities, and
- Update the Heritage Management Plan if required.

2.7.2. Stone artefacts

Stone artefacts should be managed in accordance with section 2.5 (above).

2.7.3. Hearths or grinding stones

The AECOM report concluded that artefact types including hearths or grindstone are not likely to be harmed by the BESS project. In the unlikely event that these types of sites are identified the management response should be avoidance of the site. The site should be subject to exclusion fencing, erosion control measures and annotation of construction plans with locations of the new sites. The site should be recorded as a new site on AHIMS or the BESS AS-21 site updated to incorporate the new site features.

In the event that the works cannot be revised to avoid the site a proposal for relocation of Aboriginal objects should be provided to RAPs for agreement. This would include an opportunity to visit the site and discuss the significance of the finds and options for relocation and ongoing management of the site. This may include, for example, permanent storage at a cultural centre or keeping place or completion of scientific studies such as radiocarbon dating or bio-chemical analysis.

The outcomes of this consultation should be provided to Heritage NSW and the relocation should take place in accordance with the agreed procedure.

An AHIMS site impact record form must be submitted following the relocation of artefacts.

2.7.4. Human skeletal remains

In the event that potential human skeletal remains are identified within the Project Area during construction, all work in the vicinity of the remains would cease and immediately notify the Consortiums Project Manager and Environment Manager and the standard procedures set out in the NSW Police Force Handbook (2016); and NSW Health Exhumation of Human Remains Policy (2013) would be followed.

2.8. Ongoing consultation with the Aboriginal community

The Heritage Management Plan acknowledges that the Aboriginal community are important stakeholders in the success of the BESS project. As such, RAPs will be included in all public and community updates on the project. The following opportunities to engage with the RAPs are identified by the plan:

- Delivery of contractor and staff inductions for early works contractors
- Engagement as Aboriginal sites officers for relocation of artefacts

- Provision of reports in the event that any additional finds are made during the construction program
- Site inspections where changes to archaeological sites are identified (see section 2.9 below), and
- Provision of copies of any AHIMS site record forms.

2.9. Site Management Monitoring

In the event that a new site is identified during construction works and is retained in situ, the following monitoring strategies should be put in place:

- High resolution photography of the site before taken:
 - i. before any works commence
 - ii. following the installation of exclusion and sediment control fencing
 - iii. following any major rainfall events
 - iv. where there are visible signs of pedestrian access including shoe prints
- In the event that there are visible indicators that the site has been altered which indicate that the Heritage Management Plan is not adequate to address risks to the site, changes to the plan shall be undertaken in consultation with RAPs. This may include, as an example, impacts from native wildlife or feral animals including herbivores or burrowing reptiles. Responses may include upgrade exclusion fencing to restrict animal movement into the site.
- In the event that significant rainfall impacts the site, the use of a geofabric type exclusion barrier may be considered in consultation with RAPs.

2.10. Environmental Performance Indicators

Within the context of Consortium objectives, AGL policy, compliance obligations and community expectations, the following environmental targets have been developed (Table 1):

Table 1 : Performance indicators, targets and results

Performance Indicator	Target	Result
General		
Number of major non-conformances identified during audits	0	
Number of environmental incidents notifiable to the regulator	0	
Number of environmental regulator notices, fines or prosecutions	0	
Aspect-specific		
Number of artefacts of an archaeological significance or Aboriginal origin disturbed	0	

2.11. Environmental Aspects Risk Management Process

The Consortium for the project has developed a Construction Risk Assessment which address all Environmental aspects within the project scope and identify required controls. An Environmental

Aspects Register has been defined which specifies such controls for all Environmental aspects within this plan, required by Environmental Impact Statement the Development Consent and EPC Contract.

The Environmental Aspects Register for the project details Soil and Water Management risk factors and associated controls that shall be applied with all construction activities.

Critical controls for Aboriginal and Cultural Heritage risks are to be listed on the authority to work and safe work method statement as a minimum, with any further controls and hold points are also to be listed within the job hazard environmental analysis (JHEA) with construction activities.

All construction activities and Environmental risks are to be understood and applied by the individuals supervising and conducting such activities, and all Environmental operational controls are to be verified with all personnel prior to activities occurring and when any change with the activities or work scope occurs.

References

AECOM Australia Pty Ltd, 2021. Broken Hill Battery Energy Storage System Project Aboriginal Cultural Heritage Assessment Report. Unpublished report for AGL.

AECOM Australia Pty Ltd, 2022: Broken Hill Battery Energy Storage System Project Modification Aboriginal Cultural Heritage Assessment Report Prepared for AGL Macquarie Pty Ltd

Department of Environment, Climate Change and Water (2010) Aboriginal Cultural Heritage Consultation Requirements for Proponents.

Appendix 1: Correspondence from Department of Planning.

From: no-reply@majorprojects.planning.nsw.gov.au <no-reply@majorprojects.planning.nsw.gov.au>

Sent: Friday, 22 April 2022 1:32 PM

To: Arianna Henty <AHenty2@agl.com.au>

Cc: kurtis.wathen@dpie.nsw.gov.au; Arianna Henty <AHenty2@agl.com.au>

Subject: Broken Hill Battery Energy Storage System - Endorsement of Heritage Consultant

This email is to acknowledge receipt of the Endorsement of Heritage Consultant for the Broken Hill Battery Energy Storage System.

The Department has no comments on the document at this time.

If you have any enquiries, please contact Kurtis Wathen on 02 8289 6981 /at kurtis.wathen@dpie.nsw.gov.au.

To sign in to your account click [here](#) or visit the [Major Projects Website](#).

Please do not reply to this email.

Kind regards

The Department of Planning and Environment

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Appendix 2: Correspondence with RAPS

Introduction of project and Heritage Management Plan



Our Ref: 4017-NOT-003

4 April 2022

The Chairperson
Broken Hill Local Aboriginal Land Council
84 Oxide Street
NSW 2880

To whom it may concern:

Re: Major Project Approval SSD-11437498

Valmec have been engaged by AGL Energy to complete a Battery Energy Storage System in Broken Hill, NSW. We understand that you, or your organization, was involved in the Aboriginal cultural heritage assessment undertaken by AECOM in April last year (a link to the AECOM report can be found here <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-11437498%2120210521T074529.440 GMT>).

The Department of Planning, Infrastructure and Environment (DPIE) issued project approval in September 2021 which requires the development of a Heritage Management Plan in consultation with Aboriginal stakeholders and Heritage NSW. A copy of the project approval is attached. Conditions 18 and 19 relate to cultural heritage. We provide the attached for your information and records.

If you wish to know more about the project please visit our website [Valmec awarded the Broken Hill Battery Energy Storage System \(BESS\) Project | Valmec \(Part of the Altrad Group\)](#).

Valmec are in the process of selecting technical advisors to support the development of the Heritage Management Plan. We have currently in the process of putting forward Tim Hill acting on behalf of EcoLogical Australia for DPE Approval.

Tim Hill - Principal Heritage Consultant/ Heritage Lead Regional NSW & ACT - Tim.Hill@ecoaus.com.au

If you do not wish to be involved in the development of the Heritage Management Plan please let me know via email. If you have any comments or input you can provide this via a return email. Our consulting team will be in contact soon to commence a formal consultation process.

Yours faithfully
VALMEC AUSTRALIA PTY LTD

A handwritten signature in blue ink, appearing to read 'J Amos'.

JOSHUA AMOS
Project Manager
0427 145 566
Joshua.Amos@valmecgroup.com.au

From: Joshua Amos <Joshua.Amos@valmecgroup.com.au>
Sent: Friday, April 1, 2022 4:06 PM
To: jmacleod@ntscorp.com.au
Cc: Samantha Johnson <Samantha.Johnson@valmecgroup.com.au>; Hill, Tim2 <Tim.Hill@ecoaus.com.au>
Subject: 4017-NOT-005 - Broken Hill Battery Energy Storage System (Major Project Approval SSD-11437498)

Hi James,

Please refer attached further consultation on Major Project Approval SSD-11437498 - Broken Hill Battery Energy Storage System. Our consulting team will be in contact soon to commence a formal consultation process.

If you have any questions, please don't hesitate to contact me for further information.

Regards,

Joshua Amos
Project Manager

Valmec Australia Pty Ltd

M: +61 427 145 566
E: jamos@valmec.com.au | **W:** www.valmec.com.au

57 Machinery Street, DARRA QLD 4076 | **P:** 1300 825 632



Perth | Darwin | Adelaide | Brisbane | Roma | Sydney

Valmec acknowledges the Traditional Custodians of the lands on which we operate. We continue to pay our respects to Elders past, present and emerging.

Please consider the environment before printing this email.

Email to Aboriginal stakeholders and Heritage NSW 10 June 2022

From: Hill, Tim2
Sent: Friday, June 10, 2022 3:24 PM
To: kmpotter55@gmail.com; Leroy.Johnson@environment.nsw.gov.au;
joanneodonnell05@outlook.com; ceo@bhlalc.org.au; chairperson@bhlalc.org.au;
cj_doyle@hotmail.com; heritagemailbox@environment.nsw.gov.au
Cc: Roger Mehr <roger.mehr@hotmail.com>; Marvin Pacheco <Marvin.Pacheco@valmecgroup.com.au>; Maeve Parker <mparker@ntscorp.com.au>; Sandy Chalmers

<schalmers@ntscorp.com.au>; Nicole Davis <Nicole.Davis@environment.nsw.gov.au>

Subject: Broken Hill Battery Energy Storage System

Good afternoon

ELA has been engaged by Fluence/ Valmec on behalf of AGL Energy to develop a Heritage Management Plan for the Broken Hill Battery Energy Storage System (BESS) which has been subject to Dept of Planning approval based on the Aboriginal Cultural Heritage Assessment Reports undertaken by AECOM in 2021 and 2022. We understand that you were part of the AECOM assessment- which has been approved by the Department of Planning.

In accordance with the conditions of the project, please see attached two Heritage Management Plans for the BESS project. We are seeking your input and advice on to make sure that there are adequate protections for Aboriginal sites. The plans include:

- the Battery Storage Facility (Stage 1)
- the High Voltage Power Easement (Stage 2).

The plans include provision for cultural site induction,

- Measures to ensure that the BESS project does not impact on archaeological sites outside the BESS project
- Measures to manage artefacts associated with the BESS – AS1-21 site and other archaeological sites such as hearths or grindstones should they occur within the BESS
- Engagement of Aboriginal sites officers during early works including training requirements and the engagement of support from an archaeologist
- An Unexpected find procedure including measures to management Aboriginal human remains

Please provide written advice by close of business 27 June 2022.

I appreciate that there is a lot of information contained within the plans and we will be issuing a meeting invitation to provide an opportunity to visit the BESS site again and ask any questions that might arise- can you please indicate your availability on the morning of Tuesday 21 June ? As this is a consultation meeting only, payment will not be provided. Please refer to section 3.4 of the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DEECW 2010) for additional information about consultation meetings- [Aboriginal cultural heritage consultation requirements for proponents 2010 \(nsw.gov.au\)](https://www.nsw.gov.au/aboriginal-cultural-heritage-consultation-requirements-for-proponents-2010)

If you are not able to attend or have any questions- please call me directly on 0428 379 332. I can arrange a tele- conference to discuss the plans with you if that is easier.

Tim Hill

Principal Heritage Consultant/ Heritage Lead Regional NSW & ACT

Level 1, 24 Gordon Street, Coffs Harbour NSW 2450

T +61 2 8081 2685

M 0428 379 332

Email to Aboriginal stakeholders and Heritage NSW (10 June 2022)

From: Hill, Tim2
Sent: Friday, June 10, 2022 3:24 PM
To: kmpotter55@gmail.com; Leroy.Johnson@environment.nsw.gov.au; joanneodonnell05@outlook.com; ceo@bhlalc.org.au; chairperson@bhlalc.org.au; cj_doyle@hotmail.com; heritagemailbox@environment.nsw.gov.au
Cc: Roger Mehr <roger.mehr@hotmail.com>; Marvin Pacheco <Marvin.Pacheco@valmecgroup.com.au>; Maeve Parker <mparker@ntscorp.com.au>; Sandy Chalmers <schalmers@ntscorp.com.au>; Nicole Davis <Nicole.Davis@environment.nsw.gov.au>
Subject: Broken Hill Battery Energy Storage System

Good afternoon

ELA has been engaged by Fluence/ Valmec on behalf of AGL Energy to develop a Heritage Management Plan for the Broken Hill Battery Energy Storage System (BESS) which has been subject to Dept of Planning approval based on the Aboriginal Cultural Heritage Assessment Reports undertaken by AECOM in 2021 and 2022. We understand that you were part of the AECOM assessment- which has been approved by the Department of Planning.

In accordance with the conditions of the project, please see attached two Heritage Management Plans for the BESS project. We are seeking your input and advice on to make sure that there are adequate protections for Aboriginal sites. The plans include:

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- An Unexpected find procedure including measures to management Aboriginal human remains

Please provide written advice by close of business 27 June 2022.

I appreciate that there is a lot of information contained within the plans and we will be issuing a meeting invitation to provide an opportunity to visit the BESS site again and ask any questions that might arise- can you please indicate your availability on the morning of Tuesday 21 June ? As this is a consultation meeting only, payment will not be provided. Please refer to section 3.4 of the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DEECW 2010) for additional information about consultation meetings- [Aboriginal cultural heritage consultation requirements for proponents 2010 \(nsw.gov.au\)](https://www.nsw.gov.au/aboriginal-cultural-heritage-consultation-requirements-for-proponents-2010)

If you are not able to attend or have any questions- please call me directly on 0428 379 332. I can arrange a tele- conference to discuss the plans with you if that is easier.

Tim Hill

Principal Heritage Consultant/ Heritage Lead Regional NSW & ACT

Level 1, 24 Gordon Street, Coffs Harbour NSW 2450

T +61 2 8081 2685

M 0428 379 332

On site meeting invitation (21 June 2022)

From: Hill, Tim2
Sent: Monday, June 13, 2022 10:37 AM
To: Hill, Tim2; kmpotter55@gmail.com; Leroy.Johnson@environment.nsw.gov.au; Maeve Parker; joanneodonnell05@outlook.com; ceo@bhlalc.org.au; chairperson@bhlalc.org.au; cj_doyle@hotmail.com; Roger Mehr
Cc: Catherine Mooney; Marvin Pacheco
Subject: Broken Hill BESS Heritage Management Plan consultation
When: Tuesday, June 21, 2022 8:30 AM-11:30 AM (UTC+10:00) Canberra, Melbourne, Sydney.
Where: 74 Pinnacles Pl (74 Pinnacles Pl, Broken Hill New South Wales 2880, Australia)

All

Further to my email on Friday afternoon (10 June) regarding the Broken Hill Battery Storage System (BESS) Heritage Management Plans- we are hoping to provide an opportunity for you to visit the site and discuss the plans with our senior archaeologist Roger Mehr (I will be available via phone).

Can you please indicate your availability on the morning of Tuesday 21 June. Please note that this is a consultation meeting and there will be not payment for attendance. Additional information is available in the email sent on Friday.

Hope to hear from you- please call if its easier.

Ta

Tim Hill

Principal Heritage Consultant/ Heritage Lead Regional NSW & ACT

Level 1, 24 Gordon Street, Coffs Harbour NSW 2450

T +61 2 8081 2685

M 0428 379 332

Videoconference meeting invitation (22 June 2022)

From: Hill, Tim2
Sent: Friday, June 17, 2022 4:09 PM
To: Hill, Tim2; kmpotter55@gmail.com; Leroy.Johnson@environment.nsw.gov.au; Maeve Parker; joanneodonnell05@outlook.com; ceo@bhlalc.org.au; chairperson@bhlalc.org.au; cj_doyle@hotmail.com; Roger Mehr
Cc: Catherine Mooney; Marvin Pacheco; Vicki Brady; andrew.whitton@environment.nsw.gov.au; Rose

O'Sullivan

Subject: Broken Hill BESS Heritage Management Consultation

When: Wednesday, June 22, 2022 6:30 PM-7:30 PM (UTC+10:00) Canberra, Melbourne, Sydney.

Where: Microsoft Teams Meeting

Good afternoon all

Following my phone around with everyone I appreciate that the meeting next Tuesday morning will be difficult for most to attend. I am absolutely hearing that there is a lot of proposals and new developments in the area and I acknowledge that this has put a lot of strain on the community in recent months.

Roger Mehr will still be onsite at the BESS/ Powerstation on Pinnacles Road throughout the morning. If you are able to pop in to the BESS site in please do. Roger will be arriving into Broken Hill on the Sydney flight (Monday afternoon)- if you are able to meet Monday afternoon please let me know and myself and Roger will do our best to work around your availability.

So as to provide another opportunity to take on board comments or questions- please see below a Teams link for a video conference on Wednesday evening that I will facilitate. If this time doesn't work, please call or email and we can arrange a time for you.

As always, ring me if its easier- 0428 379 332

Ta

Microsoft Teams meeting

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Phone Conference ID: 696 120 687#

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Tim Hill

Principal Heritage Consultant/ Heritage Lead Regional NSW & ACT



Level 1, 24 Gordon Street, Coffs Harbour NSW 2450

T +61 2 8081 2685

M 0428 379 332

Comments from Heritage NSW 22 June 2022

From: Andrew Whitton <andrew.whitton@environment.nsw.gov.au>
Sent: Monday, June 20, 2022 10:55 AM
To: Hill, Tim2 <Tim.Hill@ecoaus.com.au>
Cc: Rose O'Sullivan <Rose.OSullivan@environment.nsw.gov.au>
Subject: RE: Broken Hill Battery Energy Storage System

 **CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments. 

Good morning Tim.

Thank you for the provision of the draft AHMP for the above mentioned project/s for our review.

As discussed last week, I have skimmed thru and provide the following comments post review:

Stage 1.

1. 2.2 Plan Development – 4 RAPs but consultation with 3 only (Cally Doyle not included) ?
2. 2.3.2 High Voltage Power Easement – Avoidance, no specific mgt measures provided in AHMP. Please ensure site is mapped in CEMP (or similar), exclusion fencing (if appropriate with RAPs) and included in inductions (& tool box meetings) as an exclusion zone.
3. 2.5.1 Previously recorded lithic items – if the (re)location is not known, how do you know where to fence ? While I have not read the ACHAR, the draft AHMP indicates the previously assessed “lithic items” were not Aboriginal artefacts. Do they need further protections and recording ?
4. 2.6.1 – Pre works survey – if the area has already been surveyed (and some area/s have had test excavations) why is another pedestrian survey being considered ? I understand RAPs will be involved in the inductions. This may be the opportune time develop relationships re: Aboriginal employment outcomes etc associated with the development.
5. 2.6.3 Hearths or grinding stones – follow the approved unexpected heritage finds procedure.

Stage 2. (comments as above, &):

1. 2.5 Who is delivering the “Cultural Site Inductions” – who approves content, & does a “pre works survey with RAPs to confirm the extent of the archaeological site” value add ? Surely the site has been assessed, excavated/salvaged and mapped sufficiently for safeguard. Maybe ask RAPs to visit pre works to confirm exclusion fencing appropriately placed, or ask RAPs to participate in exclusion fencing installation. Not sure of the objective.
2. 2.6 – Impacts to archaeological sites outside of the approved development footprint – should not occur ! If larger area/s needed, pre assess. (NB: I learnt that the hard was with Transport for NSW).
3. 2.7.1 – Pre works survey, comments as above.
4. 2.7.2 Stone artefacts – remain consistent with what approvals have been given (sorry, not familiar yet with too many approvals outside AHIPs).
5. 2.8 Ongoing consultation with the Aboriginal community – is “monitoring”, during excavation for underground power supply being undertaking ?
6. 2.8 (as above) – point 6, typo (sites) and “Error!Reference source not found”

Thanks Tim. Actually an interesting process (thinking about approvals outside AHIPs).

Happy to chat if further clarification required (or you feel I need to understand something more clearly).

Good luck with the consultation.

Andrew Whitton

Aboriginal Senior Assessment Officer, Heritage Assessments

Heritage NSW

Department of Planning and Environment

T 02 62 297924 E andrew.whitton@environment.nsw.gov.au

dpie.nsw.gov.au heritage.nsw.gov.au

dpie.nsw.gov.au

Level 3, 11 Farrar Place

Queanbeyan NSW 2620

Working days Monday to Friday





I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

Please consider the environment before printing this email.

From: Rose O'Sullivan <Rose.OSullivan@environment.nsw.gov.au>
Sent: Thursday, 16 June 2022 8:27 AM
To: Andrew Whitton <andrew.whitton@environment.nsw.gov.au>
Subject: FW: Broken Hill Battery Energy Storage System

Hi Andrew

Hope all's well.

Could you please review these Heritage Management Plans for the Broken Hill Battery Storage project? Comments are due by 27 June – Monday week.

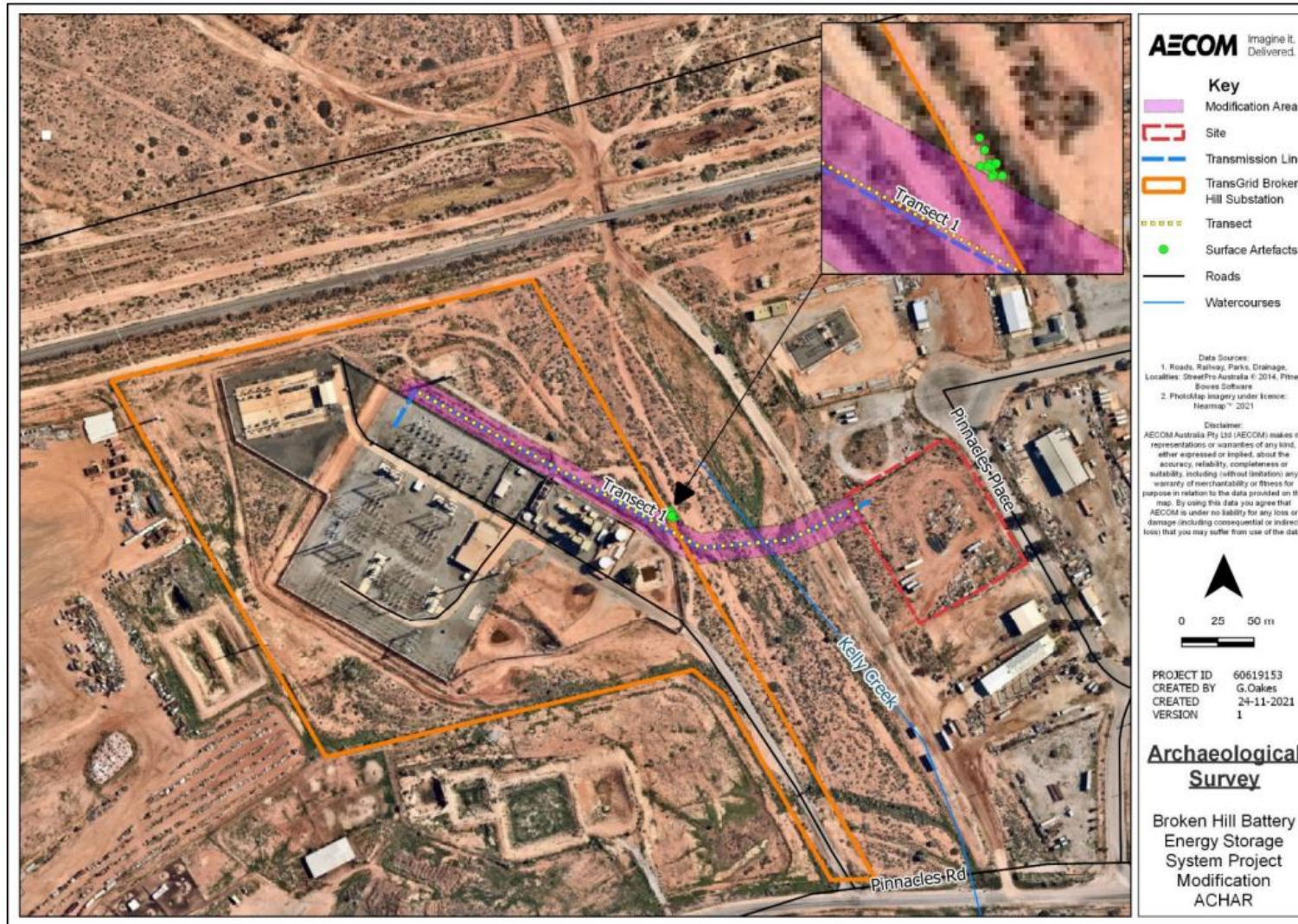
Also, would you mind giving the consultant Tim Hill a call please and clarifying if the meeting proposed for Tuesday 21 June is for RAPs or us – or both! At the moment I think it is probably too short notice for us but if it is an online meeting we may be able to call in?

I'll find some examples of HMP responses to send through too as examples. Happy to have a chat about it all.

Thanks heaps

Rose

Appendix 3: Cultural Heritage Constraints (AECOM 2022)



Appendix 4: Response to Heritage NSW comments.

Stage 1	Response	Revision
2.2 Plan Development – 4 RAPs but consultation with 3 only (Cally Doyle not included)?	<p>Cally Doyle and family were not involved in the fieldwork during the AECOM investigations and did not respond to the ACHAR.</p> <p>Cally was contacted by phone on 6 June 2022 and confirmed that her family wanted to be included as an Aboriginal stakeholder for the BESS project.</p> <p>Cally was issued the HMPs with the other RAPs and has been issued all meeting invitations.</p>	<p>Additional clarification has been provided:</p> <p>Information was not sent to Cally Doyle by mail as a result of a misunderstanding of the consultation process from the AECOM studies, as she was not involved in the onsite works. Once this omission was identified, Cally was included in all future consultation. ELA does not consider that this omission at an introductory stage substantially impacted on Callys involvement in the consultation or compromised the consultation process.</p>
2.3.2 High Voltage Power Easement – Avoidance, no specific mgt measures provided in AHMP. Please ensure site is mapped in CEMP (or similar), exclusion fencing (if appropriate with RAPs) and included in inductions (& tool box meetings) as an exclusion zone.	<p>The Battery Facility Site does not include site specific management measures because the recorded extent of the BESS-21-AS site is immediately adjacent to Stage 2 only.</p> <p>All site specific management measures are contained with the High Voltage Power Easement HMP.</p>	<p>Management of the BESS-AS-21 site</p> <p>Dot point three:</p> <ul style="list-style-type: none"> Installation of construction/exclusion fencing under the supervision of RAPs <p>Dot point 6:</p> <ul style="list-style-type: none"> Inclusion of the extent of the site on all construction and CEMP drawings <p>Dot point 7:</p> <ul style="list-style-type: none"> Inclusion of the works requirements around the BESS-AS-21 site in toolbox meetings.
2.5.1 Previously recorded lithic items – if the (re)location is not known, how do you know where to fence ? While I have not read the ACHAR, the draft AHMP indicates the previously assessed “lithic items” were not Aboriginal artefacts. Do they need further protections and recording ?	<p>The ‘lithic items’ may be relocated by Aboriginal sites officers who likely know the location of the two items. The HMP makes provision for management of these items in consultation with RAPs.</p>	<p>No revision required.</p>

Stage 1	Response	Revision
2.6.1 – Pre works survey – if the area has already been surveyed (and some area/s have had test excavations) why is another pedestrian survey being considered? I understand RAPs will be involved in the inductions. This may be the opportune time develop relationships re: Aboriginal employment outcomes etc associated with the development.	<p>The pre-works survey will be coordinated with the cultural inductions.</p> <p>The survey is precautionary in nature and is considered to be a reasonable mitigation measure given that the ground surface of the stage 1 site may have changed as a result of wind, rainfall, animal or human use of the Stage 1 area which may have exposed previously undetected stone artefacts.</p>	<p>Paragraph one:</p> <p>At the commencement of early works within the BESS representatives of RAPs should be engaged to undertake a survey of the BESS site to identify any Aboriginal archaeological sites visible on the ground surface to support the implementation of the Aboriginal objects find procedure to identify any artefacts that may have been missed during the archaeological investigation.</p>
2.6.3 Hearths or grinding stones – follow the approved unexpected heritage finds procedure.	<p>The HMP provides that in the event of an unexpected find of hearths or grindstones that the Aboriginal stakeholders are provided an opportunity to discuss and agree on a revised management procedure. This may include scientific analysis (radio carbon dating or use wear/ bio-chemical analysis) or permanent display within a keeping place or cultural centre.</p>	<p>Paragraph two:</p> <p>In the event that the works cannot be revised to avoid the site a proposal for relocation of Aboriginal objects should be provided to RAPs for agreement. This would include an opportunity to visit the site and discuss the significance of the finds and options for relocation and ongoing management of the site. This may include, for example, permanent storage at a cultural centre or keeping place or completion of scientific studies such as radiocarbon dating or bio-chemical analysis.</p>

Andrew Whitton- Stage 1	Response	Revision
2.5 Who is delivering the “Cultural Site Inductions” – who approves content, & does a “pre works survey with RAPs to confirm the extent of the archaeological site” value add ? Surely the site has been assessed, excavated/salvaged and mapped sufficiently for safeguard. Maybe ask RAPs to visit pre works to confirm exclusion fencing appropriately placed, or ask RAPs to participate in	<p>The inductions will be provided by Aboriginal sites officers from the Aboriginal stakeholders, with support from Valmec/ Fluence.</p> <p>The HMP does not condition approval of the content of inductions. The HMP provides mechanisms for Aboriginal stakeholders to seek support for the development of project specific induction materials if required.</p>	<p>Para four has been reworded:</p> <p>“Fluence will support Aboriginal stakeholders to participate the inductions. This may include additional cultural content that the Aboriginal stakeholders consider relevant to the management of Aboriginal heritage. The Aboriginal stakeholders may be remunerated for this content. All cultural and intellectual associated with this additional material</p>

Andrew Whitton- Stage 1	Response	Revision
exclusion fencing installation. Not sure of the objective.	(see comments on 2.7.1 on pre works survey)	will be retained by the Aboriginal stakeholders unless otherwise agreed.”
2.6 – Impacts to archaeological sites outside of the approved development footprint – should not occur ! If larger area/s needed, pre assess. (NB: I learnt that the hard was with Transport for NSW).	The approved works areas are defined by the major project approval. All works outside this area will be in accordance with the CEMP and may require a modification of the consent.	Dot point four <ul style="list-style-type: none">• Completion of assessment with Aboriginal stakeholders to determine the requirement for additional investigation or approval.
2.7.1 – Pre works survey, comments as above. (2.6.1 – Pre works survey – if the area has already been surveyed (and some area/s have had test excavations) why is another pedestrian survey being considered? I understand RAPs will be involved in the inductions. This may be the opportune time develop relationships re: Aboriginal employment outcomes etc associated with the development.)	The pre-works survey is important to identify and resolve any potential issues arising from mapping errors- specifically in close proximity to the BESS-21-AS site. It will also ensure that any movement of artefacts from animals or erosion is picked up on the ground.	No revision required.
2.7.2 Stone artefacts – remain consistent with what approvals have been given (sorry, not familiar yet with too many approvals outside AHIPs).	The AECOM (2022) report recommends collection and relocation of the artefacts. As the recorded artefact locations are all outside the approval area an AHIP would be required for any relocation of the artefacts as mapped (see Appendix 4). The approval provides that any movement of artefacts must be undertaken in accordance with the HMP. The HMP adopts a more precautionary approach to avoid the known and inferred extent of the BESS-21-AS site. Aboriginal sites officers will be engaged to assist in this through the pre-works survey.	This section has been revised: “Stone artefacts should be managed in accordance with section 2.5 (above).”
2.8 Ongoing consultation with the Aboriginal community – is “monitoring”, during excavation for underground power supply being undertaking?	The archaeological investigation identified that the Stage 2 site had limited to no potential for sub-surface archaeological deposits. As a result the HMP does not include monitors or spotters during trenching works.	Dot point four: <ul style="list-style-type: none">• Engagement as site monitors during of excavation of the underground power supply

Andrew Whitton- Stage 1	Response	Revision
2.8 (as above) – point 6, typo (sites) and "Error!Reference source not found"	Noted.	Dot point six- <ul style="list-style-type: none">• Site inspections where changes to archaeological sites are identified (see section Appendix 3 below)

