

**From:** [Dianne Bensley](#)  
**To:** [eia NTEPA](#)  
**Subject:** FW: Invite to comment on supplementary environmental report (SER) - Paru Road Upgrade  
**Date:** Monday, 14 March 2022 3:57:53 PM  
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Good afternoon,

I have reviewed the Invite to comment on supplementary environmental report (SER) - Paru Road Upgrade and provide the following Heritage comments:

- Initial heritage comments made in early 2021 were based on the fact that the proposed works were largely to take place within existing road reserves. Advice was provided that there were no previously recorded Aboriginal or Macassan archaeological sites within the vicinity of the project area, likely due to the fact that no archaeological surveys had ever been conducted of that area. On page 22 in the Referral Appendices B to E **Section 3.11 Cultural Heritage (3.11.1 Background)** simply states that no archaeological sites occur within the vicinity of the project area, without mentioning that no archaeological surveys have been conducted of that particular area.
- No archaeological surveys were recommended at the time, but it was recommended that care be taken (particularly in areas that required minor vegetation/land clearing, such as the gravel pits and the bores), and in the event that any archaeological material was discovered, then all works should cease and Heritage Branch be contacted for assessment or comment.
- The SER also states that the Tiwi Land Council, traditional owners and Tiwi Rangers would participate in the identification of culturally sensitive areas and ensure planning and design avoids those areas.
- On those grounds, an Unexpected Finds Protocol was developed and incorporated into the SER, which includes both Aboriginal Cultural Heritage and Historic Cultural Heritage. Heritage Branch approves of the Unexpected Finds Protocol.
- Heritage Branch are satisfied with the SER and the initial heritage recommendations remain the same; that no archaeological surveys are required, but that care be taken and works cease and any Aboriginal archaeological material that may be discovered are reported.

Regards,  
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I acknowledge Aboriginal people as the Traditional Owners of the country I work on, and their connection to land and community. I pay my respect to all Traditional Owners, and to the Elders both past and present.



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