

CULTURAL HERITAGE RISK MANAGEMENT PLAN

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1. PURPOSE

This Cultural Heritage Risk Management Plan (CHRMP) prepared by ABM is particularly for areas of potential archaeological significance. For areas designated as exclusion zones please refer to the Social Impact Risk Management Plan (SIMP).

The key stakeholders include:

- Traditional Owners / Indigenous Australians of the region surrounding the Twin Bonanza project
- 2. governments, people and businesses of the Northern Territory and Australia as a whole.

All senior personnel and board of ABM are to receive a copy of this plan and to implement the content. From time to time this plan will be reviewed, updated and distributed.

Clearances by the Central Land Council and Traditional Owners

This project is located on the Mt Frederick No.2 Aboriginal Land Trust area and as a result is subject to a number of agreements with the CLC, including the recently completed Mining Agreement.

The CLC has approved all previous exploration work, and the CLC anthropology team and Traditional Owners have conducted several surveys. There are a number of exclusion zones defined in proximity to the Mineral Lease Application area, though none of these are actually on the Mineral Lease.

The exclusion zones address sacred sites or areas of other relevance to the Traditional Owners, principally the Jaru people of the Balgo / Billiluna areas.

The location of the exclusion zones is confidential and cannot be published in this document. Suffice to say, that ABM's agreements involve avoiding and not disturbing the exclusion zones.

The avoidance of exclusion zones is covered in the SIMP and is ensured by conscientious planning and travel management.

1.1 Introduction

As part of the Environmental Impact Statement (EIS) for the Project and preparation for mining, ABM has undertaken an independent archaeological survey over the area. The survey was conducted by Tim Hill Heritage Management and Planning (THHMP). The results and recommendations from the survey form the basis of this CHMRP

The surveys and report were prepared with reference to the Guidelines to the Burra Charter: Procedures for Undertaking Studies and Reports. ABM is defined as the client and THHMP defined as the practitioner as per Section 2.0 of the guidelines.

The assessment of risk is presented in reference to the Burra Charter Process (refer to section 3.1.1). The Burra Charter is published by ICOMOS (International Council on Monuments and Sites). The Burra Charter sets a standard of practice for those who provide advice, make decisions about or undertake works to places of cultural significance, including owners, managers and custodians.

The THHMP surveys covered 37.8 kilometres of transects and used a predictive model to search for locations of archaeological sites.

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1.2 ABM policy on cultural heritage

ABM is committed to the preservation and conservation of areas of cultural heritage. These primarily relate to areas of archaeological significance.

It is ABM policy to:

- 1. conduct regular surveys carried out by professionals and review of areas where disturbance may occur
- 2. consult regularly with the CLC
- 3. train on site personnel in the identification of sites
- 4. not interfere with any sites and to preserve and conserve all sites for the current and future generations
- 5. notify the relevant authorities, including the CLC and government agencies should any new sites be identified.

2. RESPONSIBILITIES

All employees, contactors and visitors to site will be inducted on the ABM's CHRMP.

The environmental manager will be responsible for the plan and for updating and maintaining sites.

The site manager will liaise with the environmental manager to ensure that correct protocols are adhered to in all disturbance activities.

The indigenous liaison officer will also be notified of all sites and will communicate regularly on the plan with the environmental manager.

3. METHODOLOGY

3.1 Assessment of risk to areas of cultural / heritage significance

Notwithstanding the confidential clearances conducted by the CLC, ABM follows the Burra Charter Process. The assessment of risk follows the Burra Charter Process (Figure 1).

ABM is committed to preserving sites that have, or have the potential for cultural / heritage significance.

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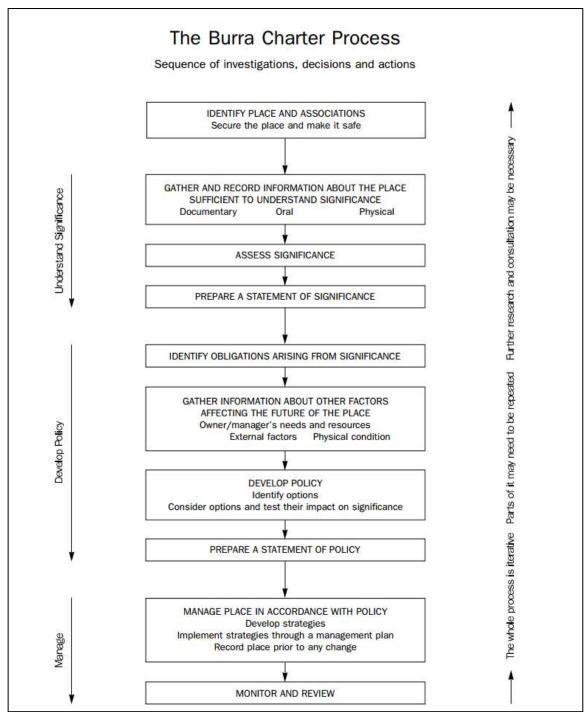


Figure 1. The Burra Charter Process.

4. MANAGEMENT AND MITIGATION

This section focuses on the management and mitigation of impacts to cultural heritage sites through mining activity at the Twin Bonanza mine site.

4.1 Maintain a register of sites

ABM will maintain a register of sites and these sites will be marked on maps, development plans and advertised at the site (unless the location of the site is deemed confidential by the CLC).

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4.2 Avoidance of known sites and ongoing protection work

There are 6 sites currently identified in the Mineral Lease area. These sites are to be avoided for exploration and mining development work. All employees and contractors will be advised of cultural and heritage sites, as well as exclusion zones (see SIMP), in the site induction.

- 1. The sites will **not** be fenced (in case of risk to fauna).
- 2. The sites will be marked with a 20 metre buffer with blue permanent pickets.
- 3. Blue permanent pickets will be spaced at 20 metre intervals along the boundary to prevent inadvertent entry.
- 4. A check-list covering sites is to be added to all disturbance work.
- 5. Travel Management as per the SIMP will be adhered to.



Figure 2. A Blue Marker indicates a 20m buffer zone around an existing known archaeological site.

4.3 Conduct regular surveys and reporting

ABM will conduct surveys of any sites that are subject to development or disturbance. These surveys will be conducted by professional practitioners and where applicable will be carried out in conjunction with the CLC.

In addition, members of ABM staff will be trained on how to identify new areas. Posters will be put up in common areas stating the plan and how to recognise new sites.

In particular, the geologists who conduct exploration are the most likely to discover new sites.

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All new sites will be reported to executive management who will report the findings to the CLC and other government organisations as appropriate.

IF IN DOUBT - MARK IT OUT POLICY

ABM and employees will adhere to a "IF IN DOUBT – MARK IT OUT" policy to areas of potential new sites. Should an employee identify a potential site they will mark it out with blue pegs (as below) and not disturb the site until an archaeological survey can be arranged by ABM.

The marker pegs are not to be removed until it is established that the area is, in fact, not a site of significance.

5. MONITORING AND REVIEW

On a quarterly basis the environmental manager will monitor all sites for disturbance. A quarterly report will be presented to ABM's board of directors.

The quarterly report to the board will contain:

- 1. A review of all known sites and confirmation that there are no changes or disturbances.
- 2. Notification of any accidental disturbance to the relevant authorities.
- 3. Details of any new sites identified during the quarter.
- 4. Evidence of notification of the new sites to the CLC and the relevant authorities.
- 5. Update of plans and procedures.

6. REPORTING

ABM has a policy to notify the relevant authorities, including the CLC and relevant government agencies, if deemed appropriate, should any new sites be identified.

Any relevant complaints and enquiries for the calendar year will also be reported in the Mining Management Plan under the *Mining Management Act 2001* and to the CLC and Traditional Owners through on ground meetings, discussing the scope and project direction, and through technical reporting under the Mining Agreement with the CLC.

6.1 Record keeping

Details of all complaints and investigations will be kept to assist in monitoring compliance with this management plan.

6.1.1 Register of external communication

A register of all external communications relevant to the Mine's operations will be maintained in ABM Incident and Complaints Register. Community complaints and inquiries will be registered recording details such as the date, time, complainant/inquirer name and address, information about the complaint/inquiry, response and corrective actions.

7. REVISION AND AUDITING

7.1 Revision

It is important that ABM have and maintain mechanisms to update this CHMRP, particularly recognising new and emerging issues and implementation into the plan. These mechanisms include:

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- 1. reporting quarterly to the board on any issues of cultural heritage risk or impact
- 2. making all employees aware of the CHMRP, and providing regular opportunity for feedback they have been receiving in the wider community
- 3. the indigenous liaison officer reporting regularly to senior management (In the case of Indigenous Australians)
- 4. allowing open and honest dialogue with the CLC and Traditional Owners.

The CHMRP will be updated at least annually to reflect any findings.

7.2 Audit

The objectives of an audit are to maintain compliance with the CHMRP.

7.2.1 Internal Audits

Internal audits of the ABM CHMRP will be conducted annually or as new circumstances arise with potential to impact cultural and heritage sites, including mine development.

7.2.2 External Audits

Independent audits of the Management Plan shall be conducted as requested by government regulators or CLC.

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8. REFERENCES

8.1 Legislation

Environment Protection and Biodiversity Conservation Act 1999 (Cth)
Native Title Act 1993 (Cth)
Aboriginal Land Rights (Northern Territory) Act 1976 (Cth)
Environmental Assessment Act 1982 (NT)
Mining Management Act 2001 (NT)
Heritage Conservation Act 1991 (NT)
Aboriginal Land Act 1980 (NT)
Northern Territory Aboriginal Sacred Sites Act 1989 (NT)

8.2 ABM Resources NL

Refer to ABM Environmental Impact Statement 2013 Appendix V Archeological Clearance Report – Tim Hill

8.3 Other Documents

Australia International Council On Monuments and Sites Incorporated. 1999, *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance*. Available from: http://australia.icomos.org/wp-content/uploads/BURRA_CHARTER.pdf. [14 August 2013].

Hill, T., 2013, *Twin Bonanza Archeological Heritage Assessment Report.* Available from: Tim Hill Heritage Management and Planning for ABM Resources. [August 2013].

Davidson, A.A. 1905, 'The Central Australian Exploration Syndicate Limited. South Australian Parliamentary Paper No 29. 1905'. *Journal of Explorations in Central Australia 1898-1900*. Republished by Friends of the State Library of South Australia 2004.

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9. DOCUMENT CONTROL AND REVISION HISTORY

9.1 Document information

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Document Owner	Environmental Manager & Managing Director
Effective Date	11/10/2013
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9.2 Revisions

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1	20/8/13	Darren Holden	Initial Issue
2	23/8/13	Jutta Zimmermann	Concurring Review
3			
4			

9.3 Read by

READ BY	SIGNATURE	DATE

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