



Appendix 02 Provisional Cultural Heritage Management Plan

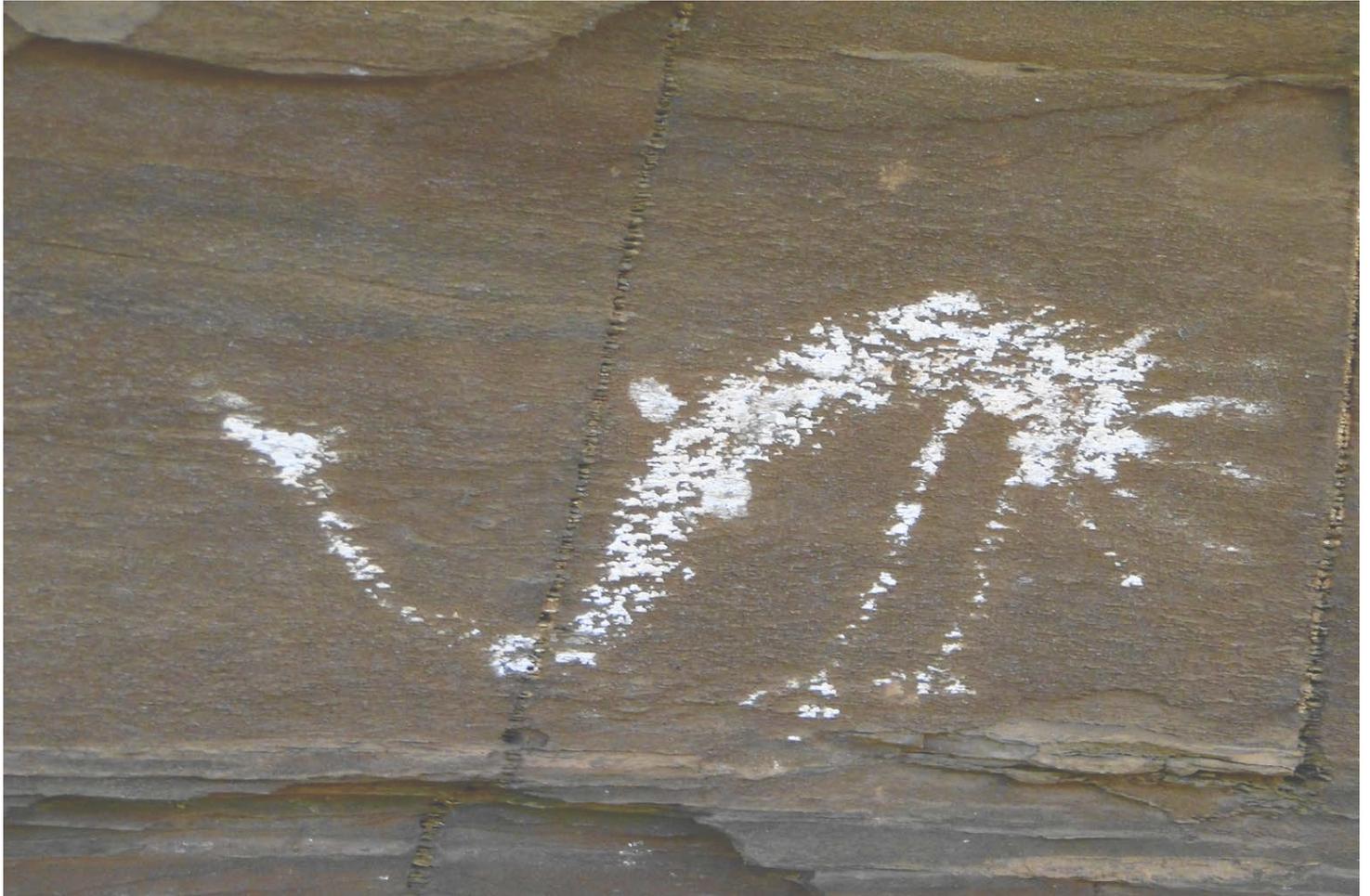


Sherwin Iron (NT) Pty Ltd
Sherwin Creek Iron Ore Project
Environmental Impact Statement



2013





Provisional Cultural Heritage Management
Plan: Sherwin Creek Iron Ore Project

PROVISIONAL CULTURAL HERITAGE MANAGEMENT PLAN: SHERWIN CREEK IRON ORE PROJECT

6 SEPTEMBER 2013

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Executive Summary

Pursuant to sacred sites and heritage legislation and its Mining Agreement with traditional Aboriginal owners, Sherwin Iron has an obligation to protect cultural heritage from the impacts of mining on the Project area. This extends to physical material such as archaeological and sacred sites and to the ore intangible facets such as language and traditional ecological knowledge.

This document is the Cultural Heritage Management Plan for the Project, which has been designed to offer the highest level of protection that Sherwin Iron can provide to cultural heritage as a part of the company's overall commitment to sustainability. Importantly, the Plan in its current form is adaptable and can be readily applied for use over other parts of the mining Project area as and when required. Sherwin Iron adheres to a philosophy of continuous improvement and under this, the plan will be re-assessed and updated regularly to ensure that only the most up to date information is included.

The Plan has at its core, a strong focus on consultation and engagement with traditional Aboriginal owners and site custodians. It has been built around a hierarchy of management principles – first to avoid impacts, second to protect heritage from mining generated impacts and finally to manage and mitigate those impacts. Where management actions are required to be taken, they will be undertaken in accordance with legislated requirements and with Sherwin Iron's suite of best practice, quality protocols and procedures.

Under this Plan, impact management is risk-based, performance oriented, strategic and auditable, thus creating a process that can be readily integrated into Sherwin iron's wider, quality controlled cultural management system.

1.0 INTRODUCTION

Culture is the sum product of many features of a society including architecture, art, knowledge, language and spiritual beliefs. It represents diversity of human life and has adapted to and developed from unique biophysical environments. Heritage may be defined as the legacy of tangible and intangible attributes of a group that are inherited from the past, maintained in the present and bestowed for the benefit of future generations. Although culture and its heritage are adaptable to change in space and time, it is important to limit the extent of unwanted change when working in a cross-cultural or multi-cultural environment.

Historic and Aboriginal archaeological places and objects are protected under the Northern Territory *Heritage Act* and sacred sites are protected under the *Northern Territory Aboriginal Sacred Sites Act* (NTASS Act). It is an offence to disturb archaeological sites or to desecrate, enter, remain on or carry out work on a sacred site unless appropriate authorisation has been obtained. For work to be undertaken in a Restricted Work Area at or near a sacred site an Authority Certificate must be first obtained from the Aboriginal Areas Protection Authority (AAPA). Authorisation to disturb an archaeological or historic site is obtained from the Heritage Branch of the Department of Lands, Planning and Environment.

Mining and its associated activities are destructive and must be managed carefully to prevent damage to or destruction of cultural heritage. Sherwin Iron has a strong commitment to protection of cultural diversity and heritage and acknowledges these are integral to social sustainability. Consequently, cultural protection has been built into all aspects of the company's operations as defined in this Cultural Heritage Management Plan.

1.1 Purpose of this plan

This plan serves as template for future Cultural and Heritage Management Plans drawn up for specific locations and activities on the Sherwin Creek Iron Ore Project (the Project). Additional information required for specific area plans is listed in Attachment A.

This plan has been prepared pursuant to assessment of risks from the Project to the cultural environment. It represents one part of Sherwin Iron's corporate objectives, demonstrates commitment to protection of Aboriginal culture and traditions and details how this will be managed.

The plan has been developed to:

- 1) outline the objectives and strategies that are required to protect historic and Aboriginal cultural heritage and sacred sites from impacts during operations at the Roper River Iron Ore mine;
- 2) outline how potential and real impacts on cultural heritage and sacred sites will be monitored and managed over the course of operations;
- 3) demonstrate compliance with cultural heritage commitments made in Agreements between Sherwin Iron's, traditional owners and the NLC;
- 4) demonstrate compliance with the Northern Territory's environmental assessment and management processes; and
- 5) demonstrate compliance with leading practice in cultural heritage management.

Periodic review of this plan will demonstrate Sherwin Iron's commitment to continuous improvement and that the imperative to minimise impacts to historic and Aboriginal heritage, Aboriginal access to land and rights to land is met.

1.2 Relevant legislation

Cultural heritage is principally managed and protected in the Northern Territory by observance of the following Northern Territory legislation:

- 1) *Northern Territory Aboriginal Sacred Sites Act 1989*;
- 2) *Heritage Act 2012*; and

These pieces of legislation are designed to offer protection to the physical aspects of cultural heritage. The Sacred Sites Act defines obligations and penalties related to protection of Aboriginal sacred sites, while the Heritage Act does the same for monuments or remains of historical structures and archaeological artefacts.

The following Commonwealth legislation also applies:

- 1) *Aboriginal and Torres Strait Islander Heritage Protection Act 1984*; and
- 2) *Environmental Protection and Biodiversity Conservation Act 1999*.

Additional levels of protection are effectively provided by other legislation that deals with land ownership and access issues, including:

- 1) *Aboriginal Land Rights (Northern Territory) Act 1976*; and
- 2) *Native Title Act 1993*.

These legislative instruments are property rights that reflect the Aboriginal relationship to land, which is the foundation of Aboriginal religion, culture and wellbeing. The Aboriginal Land Rights Act provides freehold rights to Aboriginal people where their association with the land has not been broken. Under Native Title legislation freehold rights do not exist; however access to land to perform traditional cultural activities may occur.

1.3 Scope of this plan

This plan applies to all areas of land covered by the Project. It remains current for the life of the Project, but will be subject to periodic (annual) review.

1.4 Background Information

The Project is located approximately 540 kms south-east of Darwin. It is accessed via the Stuart Highway south to Mataranka and then approximately 120kms east along the Roper Highway towards the Gulf of Carpentaria. The Project comprises four contiguous exploration licences (one of which is not yet granted) covering an area of approximately 3,500 km² and containing close to 500Mt of ore.

Part of the Project area (EL 24102) is located on the Alawa 1 Aboriginal Land Trust, while other parts are subject to Native Title Claim DC01/64. The principal claimant groups for DC 01/64 are the Alawa and Mumbaliya people. These groups still maintain a rich cultural heritage that extends many thousands of years into the past and their connection to the land remains expressed primarily through a body of traditional knowledge inexorably connected to places (sacred sites) and archaeological features.

Ethnographically the people are a mixture of several different clan groups (predominantly Alawa and Mumbaliya); some of whom are married into neighbouring clan groups (e.g. Mara, Ngalakan). Principle languages spoken are Ngukurr Kriol and English, while Aboriginal languages such as Alawa and Ngalakan are rapidly becoming extinct.

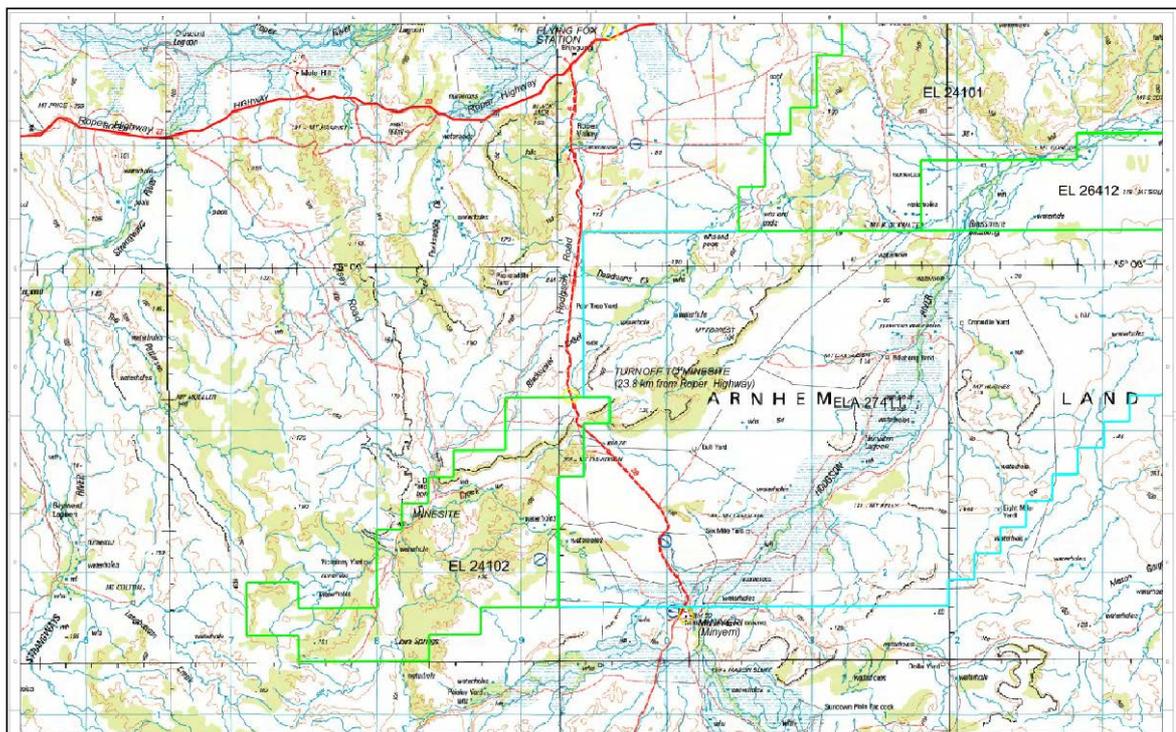


Figure 1: Location of the Project.

Sacred Sites

A sacred site survey was performed by the NLC in 2012 and several restricted work areas were identified and are shown in Figure 2. Sacred sites are also known to exist within the restricted work areas, but these are not shown on the map. Many of the restricted work areas are outside of areas of direct mining interest, but care will be required to ensure they are not entered or in any way disturbed.

There are a number of regional sites of importance located along the Roper River. One of the most important of these is the Nganawirdbird site, which consists of a large sinkhole and limestone cave on top of a hill. The cave contains various painted limestone features portraying the internal organs of a kangaroo. Nganawirdbird is recognised on the register of the National Estate. Other sites such as the Ganybunyi sites are close to the Roper Highway.

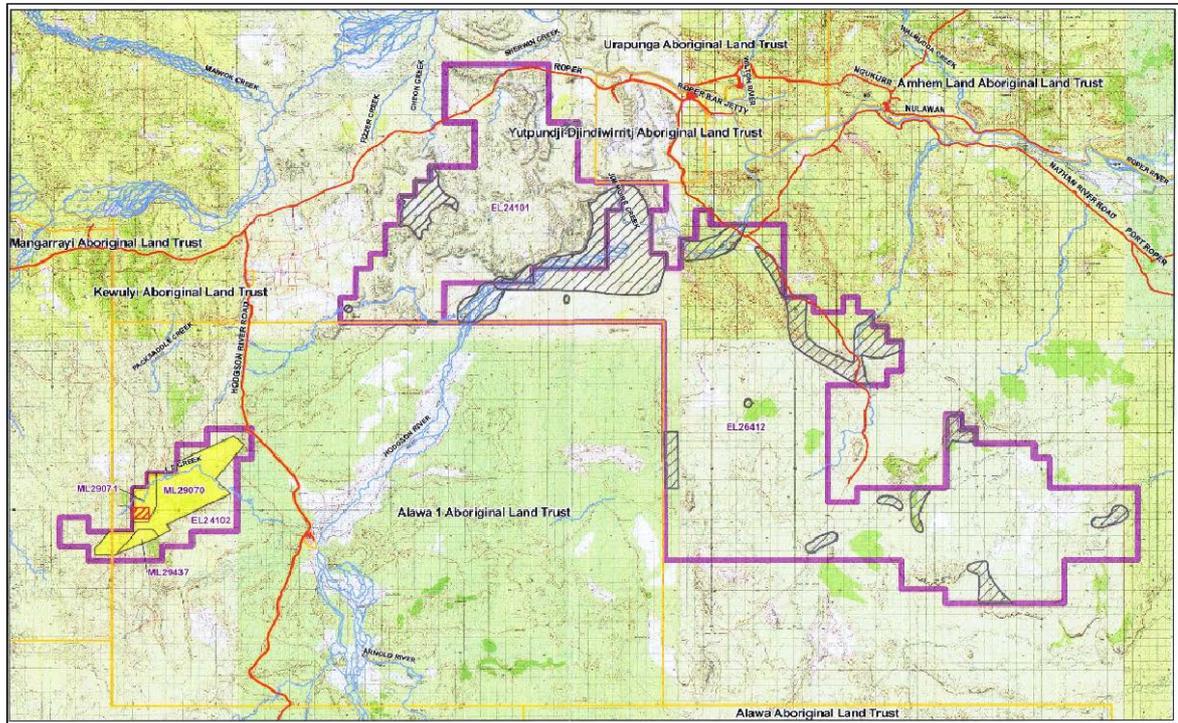


Figure 2: Sherwin Iron’s granted tenements showing restricted work areas (in grey).

Historical Sites

With the exception of the remains of the old Roper Bar police station located on the banks of the Roper River, there are no reports of sites of non-indigenous historical interest.

Archaeological sites

Publicly available archaeological information for the RRIOP is limited and may be restricted to recent surveys undertaken for adjacent tenements held by Western Desert Resources (Ecoz, 2012) to the southeast and for Australian Ilmenite Resources (Crassweller, 2011) to the west. In both instances archaeology was restricted to a handful of stone artefacts found in proximity to water sources. This outcome is generally supported by surveys along the Roper Highway (Kinhill, 1995) and near Urapunga (Guse, 1998) and suggests only sporadic use of the area.

Natural heritage sites

There are four natural heritage sites recognised within the region, these are:

- a) Mataranka Thermal Pools (100kms west of the Project);
- b) Roper River Jungle; (80kms west of the Project)
- c) Roper River and sections of its banks; and (Roper Bar area – 50kms east of the Project)
- d) Strangways Crater(50kms west of the Project)

All of these are outside of the Project area and currently outside the scope of the Cultural Heritage Management Plan.

2.0 CULTURAL HERITAGE MANAGEMENT

The first step in quality cultural heritage management is identification of those heritage attributes that will be placed at risk. Under this plan, this is done by field survey and once locations that need protection have been identified, a risk assessment is performed. Management plans are then developed for each of the risks, in accordance with a hierarchy of principles which follow the sequence:

- Avoidance of the site wherever and whenever possible;
- Protection of the site where work must be undertaken in close proximity to the site; and
- Management of the site and minimisation of impacts if the site cannot be avoided.

Following a risk-based identification of management objectives, strategies and means of monitoring success are determined. This allows the sites to be managed to the best possible standards and for contingency plans and actions to be considered should monitoring indicate that standards are not being met.

2.1 Risk assessment

The aspects of the Roper River Iron Ore Project with the greatest potential to affect Aboriginal sacred sites are those associated with large-scale disturbance of the landscape. Primarily these are:

- Clearing and earthworks for infrastructure and mining that disturb physical features in the natural landscape that have attached cultural values as ascribed to an Aboriginal sacred site.
- Unauthorised or unintentional access (through the non-observance of Restricted Work Areas) to Aboriginal sacred sites by the workforce.
- Indirect impacts arising from failure to observe cultural protocols associated with specific sacred sites (e.g. gender rules).
ISO 31000:2009 standard and generic outcomes determined. This is presented in Attachment C.

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2.2 Performance management

Cultural Heritage management objectives have been determined for the Roper River Iron Ore Project and applied to all of Sherwin Iron's mining and associated activities. They are provided in Table 1, along with targets and performance indicators. Targets are linked to best practice and the performance objectives provide a list of documents and measurable that can be used for developing appropriate monitoring programs. From this, a series of implementation strategies, which define specific actions and timelines have been determined. These are presented in Table 2.

Table 1: Cultural heritage management objectives, targets and performance indicators

MANAGEMENT OBJECTIVE	TARGET	PERFORMANCE INDICATORS
Compliance with the Heritage Act (NT):		
Manage archaeological sites where they cannot be avoided by mining or construction.	<p>No unauthorised disturbance to archaeological sites during construction and mining.</p> <p>Compliance with all conditions set under Section 76 of the Act.</p> <p>Compliance with internal protocols and procedures where they do not conflict with the Act.</p> <p>Compliance with requests of traditional Aboriginal owners where they do not conflict with the Act.</p>	<p>Incident Reports.</p> <p>Records of regular inspections.</p> <p>Records of management interventions.</p> <p>Documentation of all known disturbances.</p>
Protect known and new archaeological sites not approved for disturbance.	<p>No unauthorised disturbance to archaeological sites during construction and mining.</p> <p>Compliance with internal protocols and procedures where they do not conflict with the Act.</p> <p>Compliance with reporting requirements of Section 114 of the Act.</p>	<p>Records of reports made to the NT Government.</p> <p>Records of regular inspections.</p> <p>Records of management interventions.</p> <p>Incident Reports.</p>
Minimise disturbance to historic cultural heritage sites and values.	<p>No unauthorised disturbance of historic areas during construction and mining.</p>	<p>Incident Reports.</p> <p>Records of regular inspections.</p> <p>Records of management interventions.</p> <p>Documentation of all disturbances.</p>
Compliance with the Aboriginal Sacred Sites Act (NT):		
Avoid and protect all known Aboriginal sacred sites.	<p>No disturbance to Aboriginal sacred sites during construction and/or mining.</p> <p>Compliance with internal protocols and procedures where there is no conflict with the Act.</p> <p>Compliance with all conditions related to Authority Certificates and Restricted Work Areas</p>	<p>Incident Reports.</p> <p>Records of regular inspections of Restricted Work Areas.</p> <p>Records of management interventions.</p> <p>Records of work undertaken in close proximity to Restricted Work Areas.</p>
Protection of contemporary culture:		
Record and protect language, traditional ecological and cultural knowledge.	<p>Information is appropriately recorded in a custom-designed database or GIS.</p> <p>Intellectual property rights are protected through agreement with traditional Aboriginal owners.</p>	<p>Records of traditional and cultural knowledge entered into database.</p> <p>IP Agreement.</p>
Avoid disruption to ceremonial activities.	<p>Compliance with internal site access protocols negotiated with traditional Aboriginal owners.</p> <p>Compliance with internal employment protocols negotiated with traditional Aboriginal owners.</p>	<p>Physical access to all ceremonial sites is guaranteed and maintained</p> <p>Timesheets.</p>
Maintain continued engagement with traditional Aboriginal owners, regarding cultural heritage management.	<p>Positive and on-going relationship with traditional Aboriginal owners in respect of management of cultural heritage in the project area.</p>	<p>Records of Liaison Committee meetings.</p> <p>Records of other consultations with traditional Aboriginal owners.</p> <p>Periodic review of Cultural Heritage Management Plan.</p>

2.3 Implementation strategies

Table 2: Strategies for implementation of Cultural Heritage Management

ASPECT	ACTION	TIMELINE
<p>Compliance with the Sacred Sites Act:</p> <p>Protection of sacred sites</p>	<ul style="list-style-type: none"> Regular and ongoing engagement of traditional owners will occur. Sacred site surveys of all areas targeted for mining will be undertaken in conjunction with traditional owners and the NLC Application will be made to Aboriginal Areas Protection Authority (AAPA) for Authority Certificates under NTASS Act. The location of Restricted Work Areas will be mapped onto the project GIS as avoidance sites Sacred sites and restricted work areas in proximity to construction or mining activity will be demarcated appropriately through fencing and/or signage. 	<ul style="list-style-type: none"> Throughout the life of the project Prior to work activity in that area
<p>Compliance with the Heritage Act:</p> <p>Protection and management of archaeological sites</p>	<ul style="list-style-type: none"> Regular and ongoing engagement of traditional owners will occur. Archaeological surveys will be undertaken prior to any ground disturbing activities. All new sites will be documented, mapped and reported pursuant to Section 114 of the Act. Archaeological sites of medium – high significance or above will be recorded and mapped as avoidance sites. Archaeological sites in proximity to construction or mining activity will be demarcated appropriately through fencing and/or signage or otherwise protected in consultation with Aboriginal traditional owners. Consent under part 3.2 of the NT <i>Heritage Act</i> and consultation with Aboriginal traditional owners will occur before any site is disturbed. Site disturbance work will be undertaken in accordance with Sherwin Iron's authorized work practices. All instances of site disturbance of will be documented, photographed and reported to the CEO Heritage Conservation. 	<ul style="list-style-type: none"> Throughout the life of the project Prior to work activity in that area When news sites are identified Prior to work activity in that area Prior to work activity in that area Prior to work activity in that area When disturbance is required When disturbance is required
<p>Compliance with the Heritage Act:</p> <p>Protection and management of historical sites</p>	<ul style="list-style-type: none"> Regular and ongoing engagement of traditional owners will occur. All new sites will be documented, mapped and reported pursuant to the Act. Advice from the Heritage Branch of the Department of Lands, Planning and Environment will be sought prior to disturbance of any historical heritage site. Site disturbance work will be undertaken in accordance with Sherwin Iron's authorized work practices. All instances of site disturbance of will be documented, photographed and reported to the CEO Heritage Conservation. 	<ul style="list-style-type: none"> Throughout the life of the project When news sites are identified When disturbance is required When disturbance is required When disturbance is required

Table 2: Strategies for implementation of Cultural Heritage Management (cont.)

ASPECT	ACTION	TIMELINE
Protection of contemporary culture:	<ul style="list-style-type: none"> • Regular and ongoing engagement of traditional owners will occur. • Traditional ecological and cultural knowledge (including language) will be recorded and stored with the permission and involvement of traditional owners. • Sherwin Iron will negotiate an agreement with traditional owners in respect of how intellectual property rights associated with traditional knowledge will be protected. • Traditional ecological and cultural knowledge will be integrated into all aspects of mining, including rehabilitation and closure. 	<ul style="list-style-type: none"> • Throughout the life of the project • Throughout the life of the project • When required by traditional owners. • Throughout the life of the project

2.4 Monitoring

Quality management of cultural heritage requires an auditable monitoring program. The monitoring program is designed to measure the success of the proposed implementation strategies and actions against management objectives and targets. It should contain a series of procedures and protocols that provide outcomes that can be tracked across the life of the project. Baseline records, recorded at the start of the project are particularly important for describing any change that has occurred.

Sherwin Iron's cultural and heritage monitoring program, summarized in Table 3, has been designed to ensure that construction and mining operations are consistent with the prescribed management actions. Monitoring will be undertaken in accordance with Sherwin Iron's internal work procedures.

Table 3: Cultural Heritage monitoring program

LOCATION	PARAMETERS	PROCEDURE	FREQUENCY
Sacred Sites	<ul style="list-style-type: none"> Compliance with established Restricted Work Areas Visual evidence or reports of interference Adherence to cultural protocols Views of traditional owners 	<ul style="list-style-type: none"> As determined by and following consultation with the AAPA and traditional owners Standard Operating Procedure 	<ul style="list-style-type: none"> Annual report following consultation with traditional owners On request of traditional owners
Protected archaeological and historical sites	<ul style="list-style-type: none"> Integrity of barriers and other demarcation measures Visual evidence or reports of interference 	<ul style="list-style-type: none"> Standard Operating Procedure Visual observations and photographic comparison 	<ul style="list-style-type: none"> Opportunistically but at least twice annually On request of traditional owners
Project Area	<ul style="list-style-type: none"> Reports of unrecorded sites or artefacts 	<ul style="list-style-type: none"> Standard Operating Procedure 	<ul style="list-style-type: none"> Opportunistically
Haul Roads	<ul style="list-style-type: none"> Reports of unrecorded sites or artefacts 	<ul style="list-style-type: none"> Standard Operating Procedure 	<ul style="list-style-type: none"> Opportunistically

2.4 Contingencies and corrective actions

Even when every effort is made to develop a comprehensive understanding of the Project and to protect its cultural and heritage aspects, the unexpected may occur. Usually this happens because the

archaeology and heritage surveys undertaken did not detect all objects (e.g. small artefacts); or the information provided by traditional owners is incomplete. Aboriginal cultural information is often subject to strict traditional protocols and sites might be protected through secrecy and only revealed if they are in imminent danger. This may result in unintentional access or disturbance to locations that might otherwise be restricted. In other instances, protective measures (e.g. barriers or signposts) may have been removed, lost, damaged or otherwise fail, resulting in inadequate identification of a site.

An important part of the risk management process is to attempt to plan for the unexpected and manage it through a set of contingencies and/or corrective actions. Contingency plans and corrective actions are also required if monitoring indicates that objectives and targets for cultural heritage are not being achieved. Contingency actions need to remain flexible because solutions for problems experienced at different locations might need to be adjusted according to prior experience and site specificity.

Contingency management plans proposed by Sherwin Iron for the Project and presented in Table 4, will therefore be subject to an iterative and continuous improvement process.

Table 4: Cultural Heritage Management contingency actions

TRIGGER	CONTINGENCY ACTIONS
Protected areas are incorrectly designated on maps and in the GIS	<ul style="list-style-type: none"> • Immediate cessation of work in the area • Incident shall be investigated and reported • The location of the site shall be recorded and checked against maps and GIS data • Corrective actions are implemented
Unauthorised disturbance to heritage site designate for protection	<ul style="list-style-type: none"> • Immediate cessation of work in the area • Incident shall be investigated and reported • Corrective actions shall be implemented • Consultation with site custodians and/or Government to determine any further actions (e.g. restoration of site).
Unauthorised disturbance to aboriginal sacred site	<ul style="list-style-type: none"> • Immediate cessation of work in the area • Incident shall be investigated and reported • Corrective actions shall be implemented • Consultation with site custodians, NLC and AAPA to determine any further actions (e.g. restoration of site).
Previously unrecorded Aboriginal heritage site or archaeological object is uncovered	<ul style="list-style-type: none"> • Immediate cessation of work in the area • Implement appropriate management strategies (refer Table 2).
Discovery of skeletal remains	<ul style="list-style-type: none"> • Immediate cessation of work in the area • The location of the site shall be recorded and barriers erected around the site • The incident shall be investigated and reported, including to the police • Consultation with site custodians and/or Government to determine any further actions (e.g. restoration of site).

3.0 REFERENCES

- Crassweller, C., (2011): *A cultural heritage survey for the proposed SILL 80 project on Numul Numul Station, NT*; Begnaze Pty Ltd, Wanguri, Australia.
- Ecoz, (2012): *Draft EIS – Appendix J Archaeological Report Mine Site, Western Desert Resources Limited, Roper Bar Iron Ore Project*, Ecoz Environmental Services, Darwin, Australia
- Guse, D., (1998): *Archaeological survey of the Urapunga and Roper Bar OFC extension, Northern Territory*, a report for Telstra.
- Kinhill Engineering Pty Ltd, (1995): *Mataranka to Ngukurr proposed 140m/bit optical fibre cable link environmental assessment*, unpublished report for Telstra Corporation.

ATTACHMENT A: ADDITIONAL INFORMATION

When preparing a Cultural Heritage Management Plan for a specific location, the following additional information will be required:

- All previously submitted documentation related to the approvals process;
- Copies of relevant correspondence between the company and relevant traditional Aboriginal owners;
- Copies of relevant correspondence between the company and the Northern Territory Department of Lands and Planning Department of Lands and Planning;
- Copies of any consents to disturb archaeological sites as required pursuant to Section 72 of the *Heritage Act* (see below);
- Copies of any Authority Certificates (see below) as required under Section 19b of the *Northern Territory Aboriginal Sacred Sites Act*;
- A copy of a risk analysis specific to that area; and
- Copies of reports of any archaeological and/or historic cultural heritage surveys undertaken over the area.

Archaeological and cultural heritage application forms

A copy of the 'Application to carry out work on heritage place or object' form can be downloaded from the Department of Lands and Planning website URL: <http://www.dlpe.nt.gov.au/heritage/indigenous-heritage>

Sacred Site application forms

A copy of the 'Application for Authority Certificate' form can be downloaded from the Aboriginal Areas Protection Authority website URL: <http://www.aapant.org.au/application-forms.html>

A copy of the 'Request for information from Records' form can be downloaded from the Aboriginal Areas Protection Authority website URL: <http://www.aapant.org.au/application-forms.html>

A copy of the 'Site Registration application' form can be downloaded from the Aboriginal Areas Protection Authority website URL: <http://www.aapant.org.au/application-forms.html>

ATTACHMENT B: RISK ASSESSMENT

Risk	Aspect	Potential Impact/Hazard	Inherent Risk			Management Measures	Residual Risk		
			Consequence	Likelihood	Risk		Consequence	Likelihood	Risk
Failure to comply with NTASS Act	Unintentional or deliberate unauthorised entry to sacred site	Alienation of traditional Aboriginal owners	3	4	H	Ongoing engagement with traditional Aboriginal owners	3	2	M
		Loss of future access to land	4	3	H	Employees will be made aware of responsibilities to abide by legislation	4	2	M
		Temporary closure of Project	4	2	M	Mining Plans will be prepared such that all sites are avoided	4	1	L
		Permanent closure of Project	5	1	M		5	1	M
		Spiritual discomfort to traditional Aboriginal owners	3	4	H		3	2	M
		Court imposed penalties affecting economic viability of Project	3	1	L		3	1	L
	Mining Operations	Damage to site	3	3	M	Sites will be demarcated prior to work commencing Buffer zones will be provided around sites Mining Plans will be prepared such that all sites are avoided	3	1	L
Failure to comply with Heritage Act	Unauthorised entry to heritage site	Removal of cultural objects	3	3	M	Ongoing engagement with traditional Aboriginal owners	3	2	M
		Destruction of archaeological or historic materials	5	2	H	Employees will be made aware of responsibilities to abide by legislation	5	1	M
		Court imposed penalties affecting economic viability of Project	3	1	L	Mining Plans will be prepared such that all sites are avoided	3	1	L
		Temporary closure of Project	4	2	M	Site locations will not be made public	4	1	L
		Permanent closure of Project	5	1	M	A site register will be prepared and maintained	5	1	M
	Mining Operations	Damage to site	3	2	M	Sites will be demarcated prior to work commencing Buffer zones will be provided around sites Mining Plans will be prepared such that all sites are avoided	3	1	L

Risk	Aspect	Potential Impact/Hazard	Inherent Risk			Management Measures	Residual Risk		
			Consequence	Likelihood	Risk		Consequence	Likelihood	Risk
Loss of contemporary culture	Language	Language is lost	5	2	H	Language recording project	5	1	M
		Traditional Knowledge is lost	5	2	H	Keeping place/museum for artefacts	5	1	M
			5	2	H	Traditional Knowledge recording project	5	1	M
	Traditional Environmental Knowledge	Closure and rehabilitation outcomes are unacceptable to traditional Aboriginal owners (landowners)	3	2	M	Traditional Knowledge recording project Traditional knowledge applied during progressive rehabilitation	3	1	L
		Opportunities for locally acceptable Land Management practices may be lost	2	3	M		2	2	L
Loss of control over proprietary cultural information	Traditional Knowledge	Potential future business opportunities are lost	3	2	M	Intellectual Property Management Agreement	3	1	L
		Application of aspects of traditional knowledge to environmental management may be precluded	3	2	M	Patent applications if and where practical	3	1	L



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