

## 14 Cultural Heritage

### 14.1 Introduction

The potential impacts and mitigation measures of the McArthur River Mine Phase 3 Development Project (the Project) relating to cultural heritage issues are discussed in this chapter. The Gudanji, Binbinga and Yanyula people traditionally used the lands that the Project is located on. Aboriginal groups, including the Garawa, Mara and Alawa people, are also represented in Borroloola and its surrounding area. As members of the local community, these groups have historically been consulted about the McArthur River Mine (MRM) despite not being Traditional Owners of lands that are likely to be directly impacted by the Project.

During the development of the existing operation, a number of Aboriginal site investigation studies have been undertaken and agreements made with the Traditional Owners. Additional site investigations have also been undertaken for the Project's new footprint areas that are likely to be affected.

### 14.2 Legislative Framework

#### 14.2.1 Commonwealth legislation

Heritage sites are protected under the Commonwealth Government's *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and the *Environment and Heritage Legislation Amendment Act (No 1) 2003*. The legislation places constraints on archaeological and historic sites. The National Heritage List and the Register of the National Estate provide lists of heritage sites protected under this legislation.

The *Aboriginal Land Rights Act 1976* (ALRA) is the Commonwealth legislation under which the Northern Territory Government makes laws to ensure the protection of Aboriginal sacred sites.

#### 14.2.2 Northern Territory legislation

The Northern Territory *Heritage Conservation Act 2000* places legal constraints on the owners of private property, local government and the Crown. Declared heritage places and objects are listed in the Northern Territory Heritage Register and are protected under the Act. Prescribed archaeological places that may, or may not be declared are also protected under the Act. It is an offence to damage, destroy carry out work on, or alter a declared or prescribed site without the written consent of the Heritage Minister or the Minister's Delegate.

The *Northern Territory Aboriginal Sacred Sites Act 1989* is designed to protect Aboriginal sacred sites in the Northern Territory in accordance with the previously mentioned ALRA Commonwealth legislation. It is administered by the Aboriginal Areas Protection Authority (AAPA).

#### 14.2.3 The Aboriginal Areas Protection Authority

The AAPA is a statutory authority of the Northern Territory Government, established under the *Northern Territory Aboriginal Sacred Sites Act 1989* in accordance with the Commonwealth ALRA.

The ALRA defines a sacred site as 'a site that is sacred to Aboriginals, or is otherwise of significance to Aboriginals according to Aboriginal tradition'.

Under the *Northern Territory Aboriginal Sacred Sites Act 1989*, the AAPA (AAPA, 2002) is required to:

- receive requests for site protection from Aboriginal people
- document the information provided in support of such requests
- enter the documentation in a register
- execute protection measures for all sacred sites.

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The AAPA is responsible for assessing development projects undertaken within the Northern Territory:

- assessing the potential impact
- issuing 'clearance certificates'.

An Authority Certificate is required under the *Northern Territory Aboriginal Sacred Sites Act 1989*, for any work proposed to be undertaken on land in the Northern Territory. The AAPA issues an Authority Certificate when it is satisfied that work can be undertaken without a high risk of damage to a sacred site, or when an agreement has been reached between Aboriginal custodians of any affected sites. For the existing McArthur River Mine operations, the AAPA has issued a number of Certificates.

## 14.3 Existing measures to protect Aboriginal cultural heritage

The Project is located in an area of importance to Aboriginal people.

MRM's Community Relations and Environment team maintains a strong and positive working relationship with local Indigenous people and groups, that allow matters of Aboriginal cultural heritage to be addressed where mine related operations have the potential to disturb areas of high cultural value. In co-operation with Traditional Owners and Indigenous groups, MRM's mine planning includes archaeological and ethnographic surveys. These surveys seek to preserve important cultural sites and to aid development of agreed salvage plans when disturbance is unavoidable.

MRM includes a cultural heritage awareness component in its site induction for new employees and contractors that includes discussion regarding local cultural heritage issues and a related video. This program will be continued for all Project phases.

The AAPA clearances discussed in Section 14.7.2 state what site avoidance measures need to be undertaken during the Project's construction and operational activities.

## 14.4 Heritage Register Searches

An online search of the Australian Heritage Database was undertaken for the place name of McArthur River and Bing Bong. The database search includes a number of Heritage listings and returns registered sites as well as locations under consideration to be added to any of the listings. The heritage listings included in the database are:

- World Heritage List
- National Heritage List
- Commonwealth Heritage list
- Register of the National Estate.

### 14.4.1 McArthur River search

The McArthur River search returned three listings and a number of Indigenous places. All of the listings found were in the Register of the National Estate and are provided in Table 14-1. For legal status definitions, refer to Table 14-2.

#### 14.4.1.1 Sir Edward Pellew Group and Surrounds, Borroloola, NT.

The Sir Edward Pellew Group of islands and surrounding marine ecosystem, located 40 km to the north-east of Borroloola is comprised of island formations, seabeds, and coastal waters. In contrast to the mainland, the natural integrity of the area makes it an important reference point and benchmark for scientific research, due to limited human disturbance on the islands from activities such as pastoral pursuits. It is also an important habitat for a number of endangered species and species of biogeographic significance. A number of sites with Indigenous Values of National Estate significance are registered separately.

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Table 14-1 Results for Australian Heritage Database search for McArthur River.

Place	Place ID	Heritage List	Classification	Legal Status
Sir Edward Pellew Group and Surrounds, Borroloola, NT.	16109	Register of the National Estate	Natural	Registered
Abner Range, Carpentaria Hwy, Borroloola, NT.	18243	Register of the National Estate	Natural	Indicative Place
Caranbirini Waterhole Area, Carpentaria Hwy, Borroloola, NT	19016	Register of the National Estate	Natural	Indicative Place
3 x Indigenous Places	127, 130 & 133	Register of the National Estate	Indigenous	Registered
2 x Indigenous Places	128 & 131	Register of the National Estate	Indigenous	Removed from the Register or IL

Table 14-2 Department of Sustainability, Environment, Water, Population and Communities (SEWPAC) definitions of legal status for the Register of National Estate

Legal Status	Definition
Registered	The place is in the Register of the National Estate. Although some places may be legally registered because they are within a larger registered area, they may not necessarily possess intrinsic significance.
Indicative Place	Data provided to, or obtained by, the Australian Heritage Council or the former Australian Heritage Commission, has been entered into the database and the place is at some stage in the assessment process. A decision on whether the place should be entered in the Register has not been made.
Interim List IL	The place was in the Interim List at 1 January 2004 when the Australian Heritage Commission was abolished. The place had been publicly proposed for entry in the Register.
Removed from the Register	The place has been removed from the Register.

(Department of Sustainability, Environment, Water, Population and Communities 2010)

#### 14.4.1.2 Abner Range, Carpentaria Hwy, Borroloola, NT.

Abner Range covers 70,000 ha and is located approximately 40 km from the Project, partly bordering the eastern bank of the McArthur River. It is an ovaloid plateau, approximately 40km by 20 km that rises above the plains of the McArthur River system. Abner Range is considered one of the most extensive and spectacular developments of these formations in Australia and a geomorphological feature of international significance. Abner Range supports vegetation types of biogeographic importance that have high aesthetic values, particularly at protected springs and soaks at the bases of cliffs. The Register of the National Estate and AAPA lists many sites in the area based on evidence of Aboriginal occupation.

#### 14.4.1.3 Caranbirini Waterhole Area, Carpentaria Hwy, Borroloola, NT

Caranbirini Waterhole has an area of about 314 ha located 33 km south-west of Borroloola. Significance of the Waterhole is linked to the occurrence of a rare plant and a few rare and restricted fauna species in the area. The small waterhole has been formed where Caranbirini Creek cuts through a strike range of Roper Group sandstone.

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## 14.4.1.4 Multiple Indigenous places, Borroloola

Five Indigenous Place listings appear in the Register of the National Estate. Of these, three are listed as Registered and two are listed as being removed from the register or Interim List. No further information in regards to the description, location, history or values was available for any of the five listed Indigenous places.

## 14.4.2 Bing Bong Search

The following listing was present for the Bing Bong search (Table 14-3).

Table 14-3 Results for Australian Heritage Database search for Bing Bong.

Place	Place ID	Heritage List	Classification	Legal Status
Rosie Creek/Pine Creek Little Tern Breeding Site, Borroloola	18229	Register of the National Estate	Natural	Indicative Place

The Rosie Creek/Pine Creek Little Tern site is located to the west of the Sir Edward Pellew Islands in the south-western Gulf of Carpentaria with the majority of area's Little Terns positioned at a breeding site about 50 km north of Borroloola. The breeding site consists of two sandbanks that are adjacent to the mouths of Rosie and Pine Creek. The little tern (*Sterna albifrons*) is on the Commonwealth Endangered Species List.

## 14.4.3 Northern Territory Heritage Register Search

No declared heritage places or objects were identified in the Project area during a search of the Northern Territory Heritage Register.

## 14.4.4 Previous archaeological surveys

Haglund (1975) conducted the first archaeological survey in the Project area. The survey involved a four-week field survey of the proposed mine site as defined at that time. Stokes (1992) conducted the second survey. The survey included a 15 km<sup>2</sup> study area that encompassed the existing mine site. A total of 3.5 km<sup>2</sup> was surveyed intensively.

An archaeological investigation of the proposed open pit area was undertaken by Huonbrook Environment and Heritage Pty Ltd in October 2002. The investigations findings were reported to MRM in December 2002. The following project components were surveyed and assessed:

- open pit area
- McArthur River channel
- Barney Creek and Surprise Creek channel
- Barney Creek and Surprise Creek inundation area
- plant area
- North Overburden Emplacement Facility (OEF) area
- Tailings Storage Facility (TSF) area.

The survey found that further scientific investigation was unwarranted as the identified sites and their archaeological contents were of very low archaeological significance. It was recommended that:

- no further archaeological investigations of the above components of the proposed development should be required as a condition of the development consent process for the underground to open pit conversion project conducted for the 2005 environmental impact assessment process (open pit project)

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- approval to disturb any of the archaeological materials recorded in and around the potential impact areas should be granted without the need for further archaeological investigation.

Despite Huonbrook's (2002) recommendations, further archaeological surveys were carried out by Crassweller (2005). Five archaeological sites were identified; MRM1, MRM2, MRM3, MRM4 and MRM5. Site MRM4 was assessed to be of moderate to high archaeological significance and as a consequence of this the open pit project was altered to avoid this site.

## 14.5 Project Cultural and Historical Heritage Field Survey

### 14.5.1 Methodology

A field survey specific to the Project was carried out by two qualified experienced archeologists in June 2011 (Crassweller, 2011). A senior traditional owner of the area also assisted with the survey. The aims of the field survey were to:

- locate and record any archeological or historic objects or places in the Project footprint area
- record sufficient detail to facilitate independent assessment of their significance
- assess the significance of any archeological places or objects discovered
- provide recommendations regarding compliance with the *Northern Territory Conservation Act 2000*.

The survey was carried out in a manner that ensured the highest possible coverage of the Project area through a combination of pedestrian and vehicular transects. On average the transects were between 50 and 100 metres apart allowing for eroded or raised features that provided higher potential for the presence of archeological material to be sighted and examined. The location of any archeological places and objects were recorded with a hand held GPS using the GDA84 datum. Sites identified in the 2005 survey were also located and revisited.

Previous archeological sites recorded in the region surrounding the Project area can be broadly categorised into six different types:

- artefact scatters: occur as surface scatters or stratified deposits containing flaked or ground artefacts and hearthstones
- stone quarries: sites where stone artefacts have been extracted from an outcropping rock source
- knapping floors: scatters of artefacts associated with the fabrication of implements
- stone arrangements: related to ceremonial activities and can represent sacred or totemic sites as well as encompassing remains from shelters and other stone arrangements
- scarred trees: formed by the extraction of honey or the removal of bark for making containers and wooden tools
- burial sites and skeletal remains: marked by heaped stones or in rock shelters; also more Christian style of graves.

More detailed information about the survey can be found in Appendix D9.

#### 14.5.1.1 Site definition

Archeological sites were defined, for the purpose of this survey, as a function of the concentration of archeological material with an average density that is five times greater or more than the average density of the background scatter of artefacts. This density then defines the boundary of the site unless it is otherwise defined by environmental features. Background scatters have a low density of isolated artefacts spread over the landscape. Although they do not represent a specific site, their details were also recorded in the survey.

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## 14.5.2 Cultural heritage field survey results

The field work identified a number of archeological and historic sites that were not recorded in previous surveys. They consisted of one stone artefact scatter, MRM6, three background scatter areas consisting of isolated stone artefacts (indicated as 'BS' on the map shown as Figure 14-1), the remains of a mobile cattle yard, a section of the old Borroloola road and the remains of a clay pigeon shooting range.

For the locations of the identified sites, refer to Figure 14-1.

Table 14-4 indicates the assessed level of archaeological and heritage significance of the sites discovered during the survey as well as for sites that were previously recorded and revisited.

Table 14-4 Summary of the significance of sites and background scatters

Site No.	Significance	Comments
MRM3	Moderate	Knapping floors present, increases research potential
MRM4	Moderate to high	Large site with high density of artefacts
MRM5	Low to moderate	Research of this site could be used as a comparison with MRM4
MRM6	Moderate	Variety of raw material and moderate density of artefacts
Section of the old Borroloola Road	None	Is maintained now as a mine track
Mobile cattle yard	None	Used in the 1970s
Clay Pigeon Shooting Range	None	Used in the 1990s
All background scatters	Low	All artefacts have been recorded in detail

## 14.5.3 Ethnographic sites

The following information regarding Aboriginal ethnographic or sacred sites (as defined under the *Northern Territory Aboriginal Sacred Sites Act 1989*) of the Project area and the surrounding region was provided by AAPA (NTU, 2003).

AAPA provided information on 146 sites including 31 registered sacred sites and 115 recorded sites. The sites' significance is not sufficient to require registration with the Aboriginal people. Sites may be identified in a survey but may not proceed to the registration stage as this stage requires further information and documentation to be provided. The offence provisions of the Act however, apply to all sacred sites, both registered and recorded.

AAPA data indicates three major clusters of sacred sites that are relevant to the Project. These clusters are:

- in and adjacent to the Project Mineral Leases - five registered sacred sites in the south-west corner of ML1122 in or close to the McArthur River and one south of the ML. There are 21 sites located within 5 km of the Project mining leases. The latter sites are typically located nearby the McArthur River or its tributaries, or nearby the Carpentaria Highway
- in the vicinity of Borroloola - comprising 13 registered sacred sites and 24 recorded sites, typically near the Borroloola township and along the McArthur River
- the coast, islands and mouth of the McArthur River - comprising 10 registered sacred sites and over 50 recorded sites.

There are also widely scattered registered and recorded sites located between the Project mining leases and Borroloola.



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## 14.6 Native Title

There are no native title issues which affect the Project with all proposed activities undertaken on the existing Mineral Leases granted and validated pursuant to the *McArthur River Project Agreement Ratification Act* and the *Native Title (Validation) Act* (NT).

There is no relevant future Act that requires the procedures in the *Native Title Act 1993* (Commonwealth) to be followed.

## 14.7 Potential Impacts and Mitigation Measures

### 14.7.1 Potential impacts on identified archaeological and historical sites

The Project will have a varying impact on identified cultural heritage sites within the Project area. These are related to the expansion of the North OEF, the TSF and the accommodation village.

Table 14-5 details the potential impacts on each site and its location to the impacting mine development. More detail is available in Appendix D9.

Table 14-5 Summary of potential impacts on identified sites.

Site No.	Location	Significance	Potential Impacts
MRM3	Outside the area of the North OEF	Moderate	Should not be impacted
MRM4	Adjacent to area of impact	Moderate to high	Edge of site may be impacted
MRM5	Within North OEF	Low to moderate	Not preserved
MRM6	Within village expansion	Moderate	Not preserved
BS30, BS35-36, BS38-39, BS41-55, BS58-59, and BS64-67	Within North OEF, East OEF, village expansion and TSF Cell 4	Low	Not preserved
Section of the old Borroloola Rd	Within North OEF	None	Not preserved
Mobile cattle yard	Within North OEF	None	Not preserved
Clay Pigeon Shooting range	Within village expansion	None	Not preserved

### 14.7.2 AAPA Certificates

A number of registered and recorded sacred sites were identified through Archaeological surveys. These sites are located in areas relevant to the Project. The AAPA has previously issued Authority Certificates for the mine in accordance with Section 22 of the *Northern Territory Aboriginal Sacred Sites Act 1989* and details of each certificate are provided in Table 14-6. The Proponent will complete the necessary Authority Certification process for recently identified sites. The new East OEF area contains sites that may require certification. Prior to construction commencing, the Proponent will also apply for a new AAPA certificate for the East OEF area not currently covered by an Authority Certificate.

There is potential for earthmoving and construction activities to be conducted in the vicinity of certain sacred sites. The AAPA conditions summarised in Table 14-6 include the requirements for protecting nearby sites during the construction phase. Refer to Figure 14-1 for the location of these AAPA areas as indicated by their document number.

The Proponent, employees and contractors will adhere to the AAPA requirements. The Proponent has established internal processes, such as the requirement for a land clearance permit to ensure activities potentially affecting sacred sites receive approval by representatives of the community relations, environment and survey sections.

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Table 14-6 MRM Authority Certificates Issued by AAPA

Reference	Land	Purpose	Special Conditions	Date Issued
D89/199 90/1015/1 (Doc 47537)	150 m wide, stretching for 4.5 km from a point on the southern bank of the McArthur River approximately 100 m downstream from the river crossing, to a point on the southern bank of the McArthur River approximately 1 km to the east from Mt Stubbs.	Construction of a realignment channel to redirect the McArthur River around the open pit mine.		16 June 2004
D89/199 90/1015/1 (Doc 47538)	Land including Barney Creek realignment immediately north of the proposed open pit, following the northern bund wall, on the northern side of the Barney Creek valley.	Construction of the Barney Creek realignment.	No entry, no ground disturbing works, no damage to vegetation, no storage of material and parking of machinery allowed within areas of sacred site 6165-22. A highly visible temporary protective fence is to be erected along the outer perimeter of the work areas in the vicinity of sacred site 6165-22 and maintained while the construction works are in progress.	16 June 2004
D89/199 90/1015/1 (Doc 47540)	Land area to include open pit and bund wall straddling the current bed of the McArthur River and extending approximately 2,400 m in its north to south axis and 3,000 m in its east to west axis, with the open pit itself measuring 1,600 m and 1,400 m and 420 m deep on completion.	Mining and construction works over a period of 35 years.	No entry, no ground disturbing works, no damage to vegetation, no storage of material and parking of machinery allowed within the radius of 30 meters of sacred site 6165-65 made up by a mature gum tree. A highly visible permanent protective fence is to be erected along the outer perimeter of the work areas in the vicinity of sacred site 6165-65 and maintained while the construction works are in progress.	16 June 2004
D89/199 90/1015/1 (Doc 47541)	Land area south of Surprise Creek, immediately west of Carpentaria Highway.	Tailings Storage Facility to be built progressively in a series of lifts to a maximum height of 35 m over a 34-year life span of the project.		16 June 2004

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Table 14-6 MRM Authority Certificates Issued by AAPA (cont)

Reference	Land	Purpose	Special Conditions	Date Issued
D89/199 90/1015/1 (Doc 47542)	Land located between the Carpentaria Highway in the west and Mt Stubbs in the east.	Overburden storage to hold waste rock from open pit mining, to be built progressively in a series of lifts to a maximum height of 80 m over the life span of the project.	No entry, no ground disturbing works, no damage to vegetation, no storage of material and parking of machinery allowed within the area of sacred site 6165-22.  A highly visible permanent protective fence is to be erected along the outer perimeter of the works area in the vicinity of sacred site 6165-22.	16 June 2004
D89/199 90/1015/1 (Doc 47546)	Area of land straddling the proposed McArthur River realignment approximately 400 m to the east of the open pit bund wall.	Mining of construction material.		16 June 2004
D89/199 90/1015/1 (Doc 47547)	Area of land located 1.5 km to the west of the Carpentaria Highway and approximately 1 km south of the proposed tailings facility, straddling a track running due west from the Carpentaria Highway.	Extraction of gravel.	No entry, no ground disturbing works, no damage to vegetation other than for the purpose specified in Condition 7 herein and no storage of material and parking of machinery allowed within the area of sacred site 6165-96 consisting of three low hills.  A highly visible temporary protective fence is to be erected along the outer perimeter of the works area in the vicinity of sacred site 6165-96 and maintained while the construction works are in progress. The fencing is to follow the existing dirt track.  The existing costeaning trench dug out in the northernmost of the three hills forming the 6165-96 sacred site is to be re-filled and rehabilitated to allow natural re-growth of vegetation.  Aboriginal custodians of the 6165-96 sacred site shall be notified and given the opportunity to supervise all restoration works carried out on the site.	16 June 2004

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Table 14-6 MRM Authority Certificates Issued by AAPA (cont)

Reference	Land	Purpose	Special Conditions	Date Issued
D89/199 90/1015/1 (Doc 47548)	Area of land straddling the Carpentaria Highway and a bush track running due west from the highway, immediately to the south of the proposed tailing facility.	Extraction of construction material.		16 June 2004
D89/199 90/1015/1 (Doc 47549)	Land area to the west of the proposed open pit and north of the registered sacred site 6165-6.	Extraction of construction material.	No entry, no ground disturbing works, no damage to vegetation, no storage of material and parking of machinery allowed within the area of registered sacred site 6165-6.  A highly visible temporary protective fence is to be erected along the outer perimeter of the works areas in the vicinity of the registered sacred site 6165-6 and maintained while the extraction works are in progress.	16 June 2004
D89/199 90/1015/1 (Doc 47550)	Area of land to the south-east of the Carpentaria Highway, between the highway and Barney Creek.	Extraction of construction material.		16 June 2004
D89/199 90/1015/1 (Doc 47543)	Land immediately to the south of the existing McArthur River Mine Camp.	Expansion of the existing McArthur River Mine accommodation camp.		16 June 2004
D89/199 90/1015/1 (Doc 47551)	Area of land between the proposed McArthur River realignment and the bund wall of the open pit.	Construction works and use by heavy machinery involved in construction of the realignment and bund wall.		16 June 2004
D89/199 90/1015.1 (Doc 58279)	Land including the area between the existing airstrip at the McArthur River Mine site and the Carpentaria Highway.	All works needed for airstrip extension.		17 May 2007
D89/199 90/1015 (Doc 73058)	Land to the east of the pit and flood protection bund.	Fence line to keep cattle and feral animals away from operational areas		29 September 2010

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## 14.7.3 Mitigation Measures to Minimise Impacts

### 14.7.3.1 Ethnographic Sites

Measures to minimise potential impacts on sacred sites are included as special approval conditions of the AAPA certificates for the Project components (refer Table 14-6).

The approval conditions may require the following mitigation measures be taken:

- prevention of entry to sacred sites
- prevention of ground-disturbing works at sacred sites
- prevention of damage to vegetation at sacred sites other than for purposes specified in the condition
- prevention of storage of material and parking of machinery within areas of sacred sites, or within a certain radius of sites
- erection of highly visible temporary protective fences in specified areas (e.g. along the outer perimeter of work areas in the vicinity of sacred sites) and maintenance of fences while construction works are in progress
- notification of the Aboriginal custodians of the sacred sites and providing them with the opportunity to supervise any restoration works carried out on the site.

During the construction and operation phases of the Project, the Proponent remains committed to consultation with Traditional Owners. Ongoing consultation will ensure that any sensitive areas and/or issues are appropriately identified, managed or resolved.

### 14.7.3.2 Archaeological and Historical Sites

A number of recommendations were made as a result of the field survey pertaining to the management of archaeological sites discovered, as well as those discovered during previous surveys. Avoidance of all archaeological sites is recommended, where possible, although a number of specific recommendations were also made to ensure correct management of sites and minimal loss of cultural heritage values.

Refer to Table 14-7 for the mitigation measures to be taken to minimise impacts for the specific sites.

As is current practice at the existing operation, all employees and contractors will undergo Cultural Heritage awareness training and be made aware of the presence of archaeological and sacred sites in and surrounding the Project area. As a part of this training, employees will also be made aware of their legal obligations regarding the protection of archaeological and sacred sites through the relevant legislation and the penalties for breaching the legislation.

During all Project phases, all archaeological sites and sacred site areas should be regularly monitored to determine whether any site boundaries have been breached and to verify usefulness of the management plan.

A rapid response plan will be put in place to ensure that the NRETAS Heritage Branch is contacted in the event of the discovery of protected heritage objects during works at the Project site.

The Proponent is committed to undertaking the actions listed in Table 14-7 to mitigate the impacts of the Project on archaeological, historic and cultural values throughout the construction and operation phases.

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Table 14-7 Mitigation measures for archaeological and historical sites

Site No.	Actions to be taken
MRM3	Fenced with star pickets at regular intervals along the boundary and signage indicating that entry is prohibited
MRM4	Avoided during previous works and should also be avoided during any future works. Fenced with star pickets at regular intervals along the boundary and signage indicating that entry is prohibited
MRM5	Permission sought to destroy the site from the Minister for Heritage. Detailed surface recording of the area carried out before disturbance by a qualified archaeologist
MRM6	Permission sought to destroy the site from the Minister for Heritage. Detailed surface recording of the area including sample collection of artefacts carried out before disturbance by a qualified archaeologist
BS30, BS35-36, BS38-39, BS41-55, BS58-59, and BS64-67	Permission sought from the NRETAS Heritage Branch for areas to be disturbed before works begin
Section of the old Borroloola Rd	No further action required
Mobile cattle yard	No further action required
Clay Pigeon Shooting range	No further action required

## 14.8 Environmental Management Plan

The Project's draft Cultural Heritage Management Plan is presented in Chapter 19 – Environmental Management Plan.