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**From:** Dianne Bensley  
**Sent:** Friday, 8 April 2022 11:56 AM  
**To:** eia NTEPA  
**Subject:** FW: For comment - referral under the EP Act - Mandorah Marine Facilities  
**Attachments:** Submission form - referral - Mandorah Marine Facilities.DOCX; Mandorah Jetty - known archaeological sites.jpeg

**Categories:**

Good morning,

I have reviewed the Referral under the EP Act for the Mandorah Marine Facilities and provide the following heritage comments:

- In the **Draft Construction Environmental Management Plan** there is a section titled **14.2.4 Cultural Heritage Management**. It refers to the known heritage sites (including sacred sites) and identified Restricted Works Areas and exclusion zones, and refers to the possible historic significance of the existing jetty. It is worth noting that in the last eight years there have been numerous discoveries of skeletal remains in the area directly to the south of the project area, and further south along the dunes and intertidal zone. There is a known burial site/sacred site in that area. While it should not be directly impacted by the project, it is possible that skeletal remains can be washed out of the dune areas and into the proposed project area. In the event that any skeletal/ancestral remains are discovered during the construction part of the project, all works in the immediate vicinity should cease and the NT Police and Heritage Branch contacted for an assessment. I have attached a map extract showing the areas where skeletal remains have been discovered (red dots). Please do not make this image public.
- In the **Draft Construction Environmental Management Plan Table 14-2 Risk assessment summary table relevant to construction activities** only refers to Aboriginal sacred sites, but should also refer to the heritage/archaeological sites (which include skeletal remains), protected by the *NT Heritage Act 2011*.
- **Table 14-6** lists a number of controls or mitigation strategies in the event that any heritage items are discovered and Heritage Branch are satisfied with these measures.
- The **Draft Dredging and Spoil Disposal Management Plan** refers to sacred sites and Restricted Works Areas in the vicinity of the project area, but does not refer to possible underwater cultural heritage sites that may be discovered in the proposed dredging areas. There may be a requirement for the dredge spoil heaps to be monitored for underwater cultural heritage items such as shipwrecks, isolated artefacts (anchors etc), historic infrastructure (pylons, cables etc), unexploded ordnance, or other objects fallen or thrown from boats. The areas immediately surrounding the existing jetty are the most likely to contain those cultural heritage items referred to above, but if there is no dredging planned around it and it won't be impacted by the project, then there should be no issues from a heritage perspective for that particular area. The other larger area to be dredged should still be monitored though.

These are the main issues for Heritage Branch in relation to this project, which should be addressed in the Referral.

Kind regards,

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**Dianne Bensley**

Senior Heritage Officer, Heritage Branch  
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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.



**TERRITORY FAMILIES,  
HOUSING AND COMMUNITIES**

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