



Holcim (Australia) Pty Ltd
Dunloe Sand Quarry
Aboriginal Cultural Heritage Management Plan

December 2019

This report: has been prepared by GHD for Holcim (Australia) Pty Ltd and may only be used and relied on by Holcim (Australia) Pty Ltd for the purpose agreed between GHD and the Holcim (Australia) Pty Ltd as set out in this report.

GHD otherwise disclaims responsibility to any person other than Holcim (Australia) Pty Ltd arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

The opinions, conclusions and any recommendations in this report are based on assumptions made by GHD described in this report. GHD disclaims liability arising from any of the assumptions being incorrect.

GHD has prepared this report on the basis of information provided by Holcim (Australia) Pty Ltd and others who provided information to GHD (including Government authorities), which GHD has not independently verified or checked beyond the agreed scope of work. GHD does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

Table of contents

1.	Introduction.....	1
1.1	Objectives	1
1.2	Targets.....	1
1.3	Consultation	1
2.	Environmental requirements	2
2.1	Legislation	2
2.2	Guidelines	2
2.3	Conditions of approval	2
3.	Existing environment.....	4
4.	Environmental control measures	6
5.	Compliance management	7
5.1	Environmental Inspections and monitoring.....	7
5.2	Contingency plan	7
5.3	Reporting	7
6.	Review and improvement.....	8

Table index

Table 2-1	Consent conditions relevant to ACHMP	3
Table 4-1	Environmental controls and mitigation measures	6

Figure index

Figure 3-1	Sand Ridge Areas.....	5
------------	-----------------------	---

Appendices

Appendix A – Agency consultation

1. Introduction

This Aboriginal Cultural Heritage Management Plan (ACHMP) forms part of the Environmental Management Strategy (EMS) for Dunloe Sand Quarry. This ACHMP has been prepared to meet the requirements of the Minister's Conditions of Approval (CoA) outlined in Development Consent No. 06_0030, the mitigation measures outlined in MOD2 (GHD 2017), the Environmental Impact Statement (EIS) (Planit 2007) and relevant legislation.

1.1 Objectives

The key objective of the ACHMP is to ensure appropriate controls and procedures are implemented in order to avoid damage or disturbance of heritage items.

1.2 Targets

The following targets have been established for the management of both historical and Aboriginal cultural heritage during the operational lifetime of Dunloe Sand Quarry:

- Ensure full compliance with the relevant legislative requirements and CoA
- No damage to heritage items
- All site staff and contractors trained on unexpected finds protocol

1.3 Consultation

Extensive consultation was undertaken with the local community during preparation of the EIS and MOD2. Any concerns identified by relevant stakeholders were addressed in the EIS and MOD2 mitigation measures which have been incorporated into this ACHMP.

As per CoA 32(a), Schedule 3, the Office of Environment and Heritage (OEH) (now Biodiversity and Conservation Division (BCD)) and relevant Aboriginal communities were consulted in relation to the ACHMP. Evidence of the consultation is provided in Appendix A. No response has been received from the relevant Aboriginal communities to date.

Agency	Response
Biodiversity and Conservation Division	
Revise the Aboriginal Cultural Heritage Assessment report to:	
Include a statement confirming the report was prepared in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW 2010</i>	Updated but not part of the ACHMP
Remove references to a requirement for an Aboriginal Heritage Impact Permit	Updated but not part of the ACHMP
Ensure the recommendations are consistent with the requirement for a Care Agreement to remove Aboriginal objects from the approved project boundary for long-term management if required	Updated and recommendations incorporated into Table 4-1 of the ACHMP
Revise the Aboriginal Cultural Heritage Assessment to replace references to the Office of Environment and Heritage (OEH) with the Biodiversity and Conservation Division (BCD)	Updated

2. Environmental requirements

2.1 Legislation

Legislation relevant to heritage management includes:

- *Environmental Planning and Assessment Act 1979*
- *National Parks and Wildlife Act 1974*
- *National Parks and Wildlife Amendment Regulation 2010*
- *Native Title Act 1993 (Commonwealth)*
- *Heritage Act 1977 (Heritage Act)*
- *Aboriginal Land Rights Act 1983*
- *Native Title Act 1993 (Commonwealth)*
- *Environment Protection Biodiversity Conservation Act 1999 (EPBC Act) (Commonwealth)*

Further discussion of the above legislation is provided in the EMS, as well as the EIS and MOD2.

2.2 Guidelines

The following guidelines have been reviewed during development of this ACHMP:

- *Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW, 2010)*
- *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW (DECCW, 2010)*
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011)*
- *NSW Heritage Manual – Investigating Heritage Significance: Draft Guideline (NSW Heritage Office, 2004)*
- *NSW Heritage Manual – Assessing Heritage Significance (NSW Heritage Office, 2001)*

2.3 Conditions of approval

The consent conditions relevant to this ACHMP are listed in Table 2-1. A cross reference is also included to indicate where the condition is addressed in this ACHMP or other environmental management documents.

Table 2-1 Consent conditions relevant to ACHMP

Condition No.	Requirement	Reference
Schedule 3, Condition 32	The Proponent must prepare an Aboriginal Cultural Heritage Management Plan to the satisfaction of the Secretary. This plan must:	Section 4
	(a) be prepared in consultation with OEH and all relevant Aboriginal communities;	Section 1.3
	(b) be submitted to the Secretary for approval prior to commencement of construction; and	
	(c) include a: <ul style="list-style-type: none"> • program for additional archaeological survey/s of the disturbance area; • description of the measures that would be implemented to salvage any identified Aboriginal sites within the disturbance area; • description of the measures that would be implemented to protect any Aboriginal sites outside the disturbance area; and • description of the measures that would be implemented if any new Aboriginal objects or skeletal remains are discovered during the project. The Proponent must implement the plan as approved by the Secretary.	Section 4
Schedule 5, Condition 1A	The Proponent must ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include:	
	(a) a summary relevant background or baseline data;	Section 3
	(b) a description of: <ul style="list-style-type: none"> • the relevant statutory requirements (including any relevant approval, licence or lease conditions); • any relevant limits or performance measures/criteria; and • the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures; 	Section 1.2 and Section 2
	(c) a description of the measures that to be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;	Section 4
	(d) a program to monitor and report on the: <ul style="list-style-type: none"> • impacts and environmental performance of the project; and • effectiveness of any management measures (see (c) above); 	Section 5.1
	(e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	Section 5.2
	(f) a program to investigate and implement ways to improve the environmental performance of the project over time	Section 6
	(g) a protocol for managing and reporting any: <ul style="list-style-type: none"> • incidents; • complaints; • non-compliances with statutory requirements; and • exceedances of the impact assessment criteria and/or performance criteria; and 	Refer to the EMS
	(h) a protocol for periodic review of the plan.	Section 6

3. Existing environment

A search of the Aboriginal Heritage Information Management System (AHIMS) database, consultation and site survey by Everick Heritage Consultants and the LALC, revealed no areas within Lot 162 in DP 755721 or Lots 1 and 2 in DP 780199 were identified as containing any Aboriginal places of cultural heritage which would be impacted upon by the proposal.

However, an area of sand ridges to the east of the extraction area (Figure 3-1) has been identified as being of potential cultural sensitivity. This area was identified as potentially containing subsurface deposits of Aboriginal cultural material, and there is a low possibility that this area may contain Aboriginal burials.

The approved excavation strategy was completed in late 2018 and early 2019 in accordance with Condition 32(c) of Schedule 3 of the development consent. The implementation of the excavation strategy identified no Aboriginal objects or places as a result of the pedestrian survey and subsequent archaeological test excavations. It was determined that the project area possesses nil archaeological significance. The outcomes of the excavation strategy is reported in the *Aboriginal Cultural Heritage Assessment Report – Dunloe Sand Quarry, Pottsville, NSW* (RPS 2019).

The area outside of the sand ridges has a history of high disturbance, and it is considered unlikely that any cultural material would remain within this area.

In conjunction to the above surveys, no evidence in the form of buildings, equipment, 'springboard trees', artefacts or any other material which might be considered to be of European heritage value were identified.

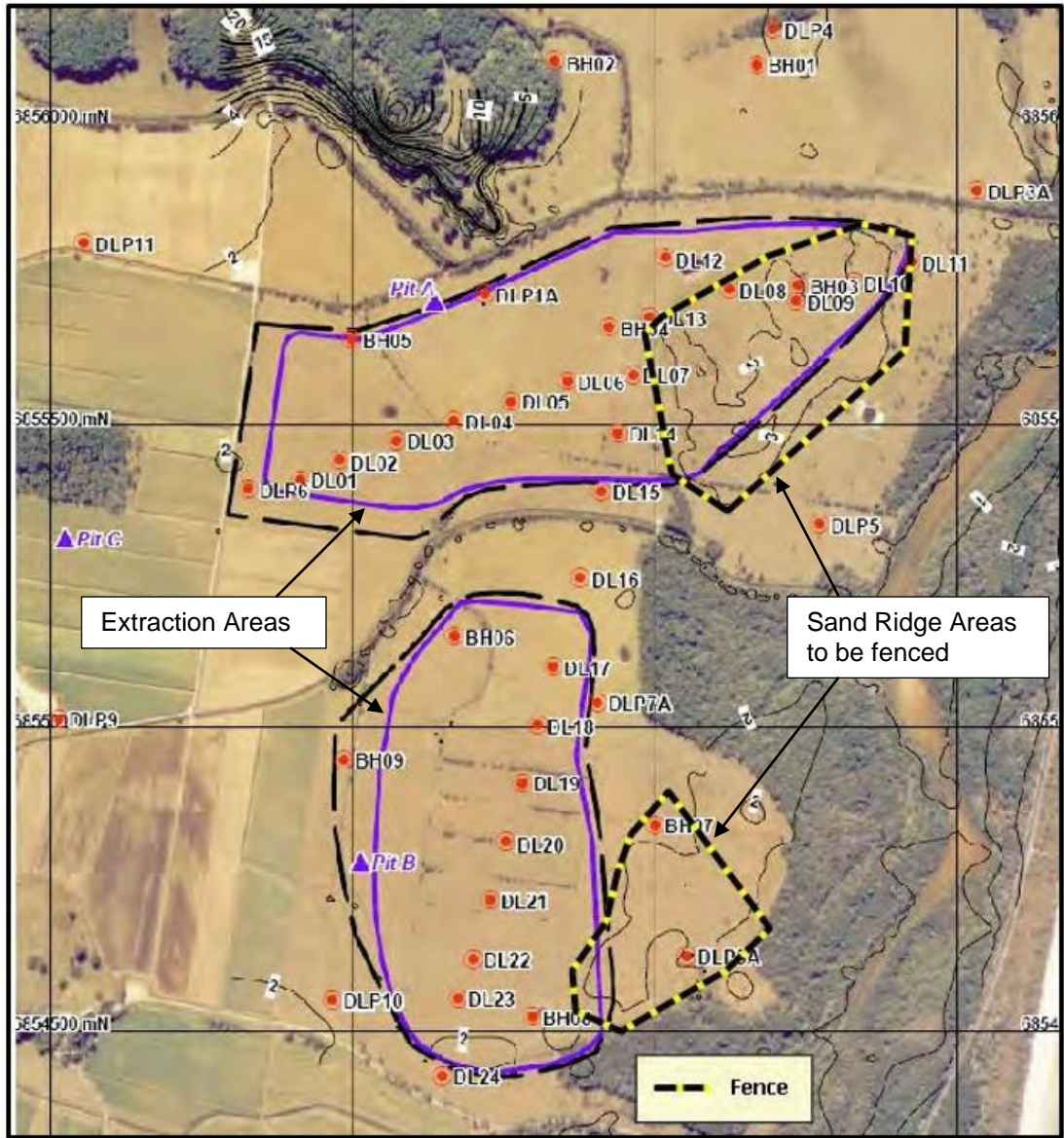


Figure 3-1 Sand Ridge Areas

4. Environmental control measures

Environmental requirements and control measures are identified in the CoA and the EIS. Specific measures and requirements to address potential heritage impacts are outlined in Table 4-1.

Table 4-1 Environmental controls and mitigation measures

Ref.	Environmental Management Measure	Timing	Responsibility
H1	All Holcim (Australia) Pty Ltd personnel and subcontractors must be advised of the requirements of the NPWS Act 1974 that it is an offence for any person to knowingly destroy, deface, damage or permit destruction, or defacement to an Aboriginal relic or place without the consent of the Director General of BCD.	Operation	Quarry Manager
H2	In the event that skeletal remains are identified, work must cease immediately in the vicinity of the remains and the area must be cordoned off. The proponent must contact the local NSW Police who will make an initial assessment as to whether the remains are part of a crime scene or possible Aboriginal remains. If the remains are thought to be Aboriginal, BCD must be contacted on Enviroline 131 555. A BCD officer will determine if the remains are Aboriginal or not; and a management plan must be developed in consultation with the relevant Aboriginal stakeholders before works recommence.	Operation	All employees and contractors
H3	If any Aboriginal archaeological deposits and/or objects are found during operation, then all work is to cease in the immediate vicinity of the deposits and/or objects, the area is to be demarcated and BCD, on Enviroline 131 555, the participating Aboriginal stakeholders and a qualified archaeologist are to be notified.	Operation	Quarry Manager

5. Compliance management

5.1 Environmental Inspections and monitoring

Routine weekly inspections by the Quarry Manager (or delegate) will occur throughout the operational lifetime of the quarry using the *Environmental Inspection Checklist* in Appendix A of the Environmental Monitoring Program. This will ensure the actions in Table 4-1 are implemented, monitored, maintained and reported.

5.2 Contingency plan

In the unlikely event that Aboriginal cultural materials or skeletal remains are uncovered, the actions outlined in Table 4-1 are to be followed.

5.3 Reporting

The general reporting requirements are described in Section 8.4 of the EMS. In relation to the monitoring, the routine monitoring will be recorded on the *Environmental Inspection Checklist* in the Environmental Monitoring and Management Plan.

If Aboriginal cultural materials or skeletal remains are uncovered, this will need to be documented in accordance with Table 4-1 and BCD requirements.

A summary of any finds of Aboriginal cultural materials or skeletal remains will be presented in the Annual Report (refer to Section 8.4.1 of the EMS).

6. Review and improvement

Continuous improvement of this ACHMP will be achieved in accordance with Section 9 of the EMS, through the ongoing evaluation of environmental management performance against environmental policies, objectives and targets.

The continuous improvement process is designed to:

- Identify areas of opportunity for improvement of environmental management and performance.
- Determine the cause or causes of non-conformances and deficiencies.
- Develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies.
- Verify the effectiveness of the corrective and preventative actions.
- Document any changes in procedures resulting from process improvement.

Appendices

Appendix A – Agency consultation



Our Ref: DOC19/676169
Your Ref: 06_0030

GHD
230 Harbour Drive
Coffs Harbour NSW 2450

Attention: Mr Ben Luffman

Dear Mr Luffman

Subject: Dunloe Quarry MOD 2 - Landscape and Aboriginal Cultural Heritage Management Plans

Thank you for your letter dated 8 August 2019 about the amended management plans for the Dunloe Quarry MOD 2 seeking comments from the Biodiversity and Conservation Division (BCD) of the NSW Department of Planning, Industry and Environment. I appreciate the opportunity to provide input.

The Biodiversity and Conservation Division was formerly part of the Office of Environment and Heritage (OEH) but now forms part of the new Environment, Energy and Science Group in the Department of Planning, Industry and Environment (see <https://www.dpie.nsw.gov.au>).

We have reviewed the documents supplied and advise there are several issues apparent with the Landscape Management Plan (LMP), particularly the koala management plan, which lacks adequate detail. The main issues include:

- a) no description of the author qualifications in the Landscape Management Plan (LMP);
- b) insufficient or incorrect references to approval conditions and document sections;
- c) lack of supporting information in the Koala Management Plan (KMP);
- d) the need to refine koala management, monitoring and contingency measures.

These issues are discussed in detail in **Attachment 1** to this letter.

Prior to finalising the landscape and Aboriginal cultural heritage management plans we recommend that GHD:

1. Revises the Landscape Management Plan to:
 - a) include the relevant qualifications and experience of the contributors to demonstrate compliance with Project Approval 27(a); and
 - b) indicate in Table 2.1 that Project Approval Condition 28 clauses (h) and (i) are addressed in Appendix C.

2. Revises the Rehabilitation and Revegetation Management Plan to include Project Condition 28 in the list of conditions addressed.
3. Revises the Koala Management Plan to:
 - a) replace references to sections and tables of other management plans with the relevant content being referred to in order to minimise potential errors resulting from subsequent management plan revisions or amendments;
 - b) include mapping of koala habitat, koala records and potential koala movement corridors (i.e. habitat links) within and adjacent to the subject land and along the haul road between the quarry site and the Pottsville Road intersection;
 - c) acknowledge the possibility of infrequent koala movements during hours of quarry operation;
 - d) identify the most likely areas of interaction between koalas and quarry vehicles (e.g. koala habitat links);
 - e) include a proposed amendment to the quarry induction process to include an explanation of the legal consequences of unauthorised clearing of native vegetation on the quarry site;
 - f) include provision of compensatory koala food tree plantings as a contingency measure in the event of unauthorised clearing taking place;
 - g) ensure the proposed monitoring methodology focuses on identifying areas of koala activity susceptible to road strike rather than attempting to identify temporal changes in koala densities.
 - h) reduce the proposed koala road-strike threshold for management action from three koalas for the year to any koala at any time
4. Revise the Aboriginal Cultural Heritage Assessment Report to:
 - a) include a statement confirming the report was prepared in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW 2010*;
 - b) remove references to a requirement for an Aboriginal Heritage Impact Permit; and
 - c) ensure the recommendations are consistent with the requirement for a Care Agreement to remove Aboriginal objects from the approved project boundary for long-term management if required.
5. Revise the Aboriginal Cultural Heritage Management Plan to replace references to the Office of Environment and Heritage (OEH) with the Biodiversity and Conservation Division (BCD).

If you have any further questions about this issue, Mr Don Owner, Senior Conservation Planning Officer, Biodiversity and Conservation, can be contacted on 6659 8233 or at don.owner@environment.nsw.gov.au.

Yours sincerely

 4 September 2019

DIMITRI YOUNG
Senior Team Leader Planning, North East Branch
Biodiversity and Conservation

Contact officer: DON OWNER
6659 8233

Enclosure: Attachment 1: Detailed BCD Comments – Dunloe Quarry MOD 2 – Landscape and ACH Management Plans

Attachment 1: Detailed Biodiversity and Conservation Comments – Dunloe Quarry MOD 2 – Landscape and Aboriginal Cultural Heritage Management Plans

Landscape Management Plan

Author Qualifications

Project Approval 27(a) requires the plan to be prepared by suitably qualified consultants, including specialist hydrologist, coastal engineer, wetlands ecologist and landscape architect. The Landscape Management Plan (LMP) does not contain the qualifications of the contributing authors, which is necessary to demonstrate this condition has been met.

BCD Recommendation:

1. Revise the LMP to include the relevant qualifications and experience of the contributors to demonstrate compliance with Project Approval 27(a).

Project Approval Condition 28

The Rehabilitation and Revegetation Management Plan (RRMP) contained in Appendix A of the LMP claims to address the requirements of Conditions 26, 27a and 29 of the Project Approval. However, Project Approval Condition 28, which specifies what must be included in the RRMP, has not been referred to in the RRMP.

BCD Recommendation:

2. Revise the RRMP to include Project Condition 28 in the list of conditions addressed.

Koala Management Plan

Table 2.1 of the LMP indicates Project Approval Condition 28 clauses (h) and (i), which relate to koala management, are addressed in the RRMP provided in Appendix A. However, these conditions have not been addressed in the RRMP. Instead, they have been addressed in the Koala Management Plan (KMP) contained in Appendix C of the LMP.

BCD Recommendation:

3. Revise Table 2.1 of the LMP to indicate Project Approval Condition 28 clauses (h) and (i) are addressed in Appendix C.

Section 1.3 of the KMP refers to Section 5.4.1 of the LMP for details of the KMP reporting provisions. However, the LMP does not contain a Section 5.4.1. It is also indicated in this section that the presence of koalas will be noted during the monitoring program set out in Table 5.1 of the LMP. However, Table 5.1 provides a very brief summary of the monitoring program for the rehabilitation area, which would not include monitoring of the haul road.

BCD Recommendation:

4. Revise the KMP to replace references to sections and tables of other management plans with the relevant content being referred to in order to minimise potential errors resulting from subsequent management plan revisions or amendments.

The KMP does not provide any supporting information to inform or provide context to the proposed koala management or monitoring provisions.

BCD Recommendation:

5. Revise the KMP to include mapping of koala habitat, koala records and potential koala movement corridors (i.e. habitat links) within and adjacent to the subject land and along the haul road between the quarry site and the Pottsville Road intersection.

Section 1.2.1 of the KMP indicates the risk of koala mortalities due to quarry-related vehicle strike will be low due to the quarry operating hours not coinciding with the main periods of koala movement. This assumption is generally accurate. However, although infrequent, some koala movements may still occur during the quarry operating hours (e.g. movements resulting from territorial disputes or during dispersal of young from natal areas).

BCD Recommendations:

6. Revise the KMP to acknowledge the possibility of infrequent koala movements during hours of quarry operation.
7. Revise the KMP to identify the most likely areas of interaction between koalas and quarry vehicles (e.g. koala habitat links).

Section 1.2.2 of the KMP briefly discusses the potential impacts of unauthorised clearing of koala habitat. However, no preventative or contingency measures other than clearly demarcating the limit of authorised clearing have been proposed.

BCD Recommendation:

8. Revise the KMP to include a proposed amendment to the quarry induction process to include an explanation of the legal consequences of unauthorised clearing of native vegetation on the quarry site.
9. Revise the KMP to include provision of compensatory koala food tree plantings as a contingency measure in the event of unauthorised clearing taking place.

Proposed monitoring of the frequency of koala sightings would be based on incidental records rather than application of a systematic repeatable sampling method. The resulting dataset will not provide a reliable measure for determining temporal changes in koala occupancy levels or local population size, as intended in the KMP.

Nevertheless, such information may have some use in identifying areas of important koala occupancy, which could then be used to identify potential road strike '*black-spots*' and to formulate mitigation measures (e.g. speed limits, warning signage, traffic calming devices etc.).

BCD Recommendation:

10. Revise the KMP to ensure the proposed monitoring methodology focuses on identifying areas of koala activity susceptible to road strike rather than attempting to identify temporal changes in koala densities.

Table 1 of the KMP lists one of the proposed management triggers as being '*quarry-related vehicle koala strikes reach or exceed three for the year*'. This trigger threshold is too high given that three koalas are likely to represent a significant proportion of the koala population utilising the subject land and adjoining areas in any given year.

BCD Recommendation:

11. Revise the KMP to reduce the proposed koala road-strike threshold for management action from three koalas for the year to any koala at any time.

Aboriginal Cultural Heritage Management

RPS prepared an Aboriginal cultural heritage assessment report (ACHAR) to investigate the potential for harm to Aboriginal cultural heritage resulting from proposed expansion of the extraction boundaries into currently fenced off sand ridge areas. However, the ACHAR was not undertaken under the defence of being in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW 2010*.

References in the ACHAR to the need for an Aboriginal Heritage Impact Permit (AHIP) are incorrect given any proposed harm to Aboriginal objects from the approved project would be regulated by a management plan approved by the Secretary of the Department rather than an AHIP.

However, any Aboriginal objects identified whilst undertaking the approved project works could be lawfully removed from within the approved project boundary if the removal is consistent with the will of the Registered Aboriginal Parties and undertaken in accordance with a Care Agreement issued by the Department of Planning, Industry and Environment under section 85A(1)(c) of the *National Parks and Wildlife Act 1974*.

We note that one of the three recommendations provided in the ACHAR for inclusion in the updated Aboriginal Cultural Heritage Management Plan (ACHMP) appears inconsistent with the requirement for a Care Agreement to remove Aboriginal objects from the approved project boundary for long term management if required.

The relevant state government point of contact provided in the ACHMP for various aspects of Aboriginal cultural heritage recording and reporting (i.e. OEH) has recently changed and this should be amended to the Biodiversity and Conservation Division (BCD).

BCD Recommendations:

12. Revise the ACHAR to:
 - a) include a statement confirming the ACHAR was prepared in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW 2010*;
 - b) remove references to a requirement for an AHIP.
 - c) ensure the recommendations are consistent with the requirement for a Care Agreement to remove Aboriginal objects from the approved project boundary for long term management if required.
13. Revise the ACHMP to replace references to the Office of Environment and Heritage (OEH) with the Biodiversity and Conservation Division (BCD).

Ben Luffman

From: Jackie McDonald <mctogo2@gmail.com>
Sent: Monday, 14 October 2019 4:34 PM
To: Ben Luffman
Cc: Paul J Buxton; Victoria Musgrove (InTouch)
Subject: Re: Dunloe Quarry - Heritage Management Plan

CompleteRepository: 2220056
Description: Dunloe EMP
JobNo: 20056
OperatingCentre: 22
RepoEmail: 2220056@ghd.com
RepoType: Job

Hello Ben

Sorry for our delay in responding.

I have spoken to both Paul and Jason and I am satisfied with the updated Aboriginal Cultural Heritage Management Plan for Dunloe Sand Quarry.

Regards Jackie McDonald

Sent from my iPhone

On 4 Oct 2019, at 3:53 pm, Ben Luffman <Ben.Luffman@ghd.com> wrote:

Thanks Jackie

Regards

Ben Luffman | A GHD Associate

B.App.Sc. (Hons) | Grad.Dip. Urban and Regional Planning | Environmental Auditor
Technical Director - Environment

GHD

Proudly employee owned

T: +61 2 6650 5613 | M: +61 415 271 319 | E: ben.luffman@ghd.com
230 Harbour Drive, Coffs Harbour, NSW, 2450 | www.ghd.com

Connect

<image001.png> <image002.png> <image003.png> <image004.png>

[WATER](#) | [ENERGY & RESOURCES](#) | [ENVIRONMENT](#) | [PROPERTY & BUILDINGS](#) | [TRANSPORTATION](#)

<image005.png> **GHD acknowledges the Traditional Owners of Country throughout Australia. We pay respect to their continuing culture and Elders past, present and emerging. [Click here](#) to learn about our Reconciliation Action Plan.**

 **Please consider the environment before printing this email**

1 ream of paper = 6% of a tree / 5.4kg CO2 in the atmosphere | 3 sheets of A4 paper = 1 litre of water

From: Jackie McDonald <mctogo2@gmail.com>
Sent: Friday, 4 October 2019 2:22 PM
To: Ben Luffman <Ben.Luffman@ghd.com>

Ben Luffman

From: Paul Buxton <paul.j.buxton@gmail.com>
Sent: Monday, 14 October 2019 4:42 PM
To: Ben Luffman
Subject: Dunloe Sand Quarry updated ACHMP

CompleteRepository: 2220056
Description: Dunloe EMP
JobNo: 20056
OperatingCentre: 22
RepoEmail: 2220056@ghd.com
RepoType: Job

Hello Ben,

I have spoken to my sister Jackie and I concur with her and am satisfied with the updated ACHMP for the Dunloe Sand Quarry.
Sorry for the delay.

Regards

Paul Buxton

B u x t o n s

Work Town n Country Wear

Shop 4/15 William Street

Beaudesert Qld 4285

Home/Office: (07) 55454307

Shop: (07) 55411373

Email: paul.j.buxton@gmail.com

This e-mail has been scanned for viruses

Ben Luffman

From: Sites <sites@tblalc.com>
Sent: Thursday, 26 September 2019 2:11 PM
To: Ben Luffman; Admin; paul.j.buxton@gmail.com; hesion@live.com.au; mctogo2@gmail.com
Cc: Victoria Musgrove; Cultural Heritage
Subject: RE: Dunloe Quarry - Heritage Management Plan

CompleteRepository: 2220056
Description: Dunloe EMP
JobNo: 20056
OperatingCentre: 22
RepoEmail: 2220056@ghd.com
RepoType: Job

Hi Ben

TBLALC concurs with the two reports:

- Holcim (Australia) Pty Ltd Dunloe Sand Quarry Aboriginal Cultural Heritage Management Plan August 2019, and
- RPS Aboriginal Cultural Heritage Assessment Report Dunloe Sand Quarry, Pottsville NSW 1.2 September 2019 – which, I note, includes the previous comments on the draft report by the Registered Aboriginal Parties.

My only comment, *which is a very general one*, is that references to the previous ‘disturbance’ of an area as a qualifying factor in the conduct of ACH assessments is a recurring dilemma. I am aware that disturbance is mentioned in this way in various government publications. The physical destruction or removal of evidence doesn’t obliterate history (in fact, often, the act of obliteration is a major part of the historical record). There are many other cultures that make this same point – often with religious fervour. Aboriginal culture, more than most others, is *totally* connected to country and can’t be removed. Logically, ‘disturbance’ is only a relevant consideration where it is *likely* that the *physical* record of Aboriginal culture has actually been destroyed.

For clarity, I am not suggesting that this is relevant to the Dunloe Sand Quarry. Quite the opposite, we have been most appreciative of the detailed evaluation that has been undertaken.

Kind Regards

Maurice Gannon

Maurice Gannon
Conservation Planning Officer
Tweed Byron Local Aboriginal Land Council
PO Box 6967, Tweed Heads South NSW 2486
Ph: 07 5536 1926 **Mb:** 0407 643 349
www.tblalc.com



The information in this message is intended only for the recipient named in this email. If you are not that recipient, you may not read, copy, distribute or act upon this message as the information it contains may be privileged and confidential. If you have received this message in error, please notify the sender. Thank you for your cooperation.

From: Ben Luffman [mailto:Ben.Luffman@ghd.com]
Sent: Wednesday, 18 September 2019 2:23 PM
To: Admin <admin@tblalc.com>; Sites <sites@tblalc.com>; paul.j.buxton@gmail.com; hesion@live.com.au; mctogo2@gmail.com
Cc: Victoria Musgrove <victoria.musgrove@lafargeholcim.com>
Subject: Dunloe Quarry - Heritage Management Plan

Hi,

We have updated the management plans for Dunloe Quarry following the recent approval of MOD2. The conditions of the Project Approval – SSD 06_0030 require the Heritage Management Plan to be prepared in consultation with relevant Aboriginal communities. We have therefore attached the relevant plan for review.

The updates have mainly been a reformatting to remove duplication, inclusion of additional information to address the new requirements of the conditions and removing actions no longer relevant because further investigations have found no evidence of Aboriginal heritage at the site. The report prepared following the further investigations is also attached.

We would appreciate your comments by 27 September 2019.

Please contact me if you have any questions.

Regards

Ben Luffman | A GHD Associate

B.App.Sc. (Hons) | Grad.Dip. Urban and Regional Planning | Environmental Auditor
Technical Director - Environment

GHD

Proudly employee owned

T: +61 2 6650 5613 | M: +61 415 271 319 | E: ben.luffman@ghd.com
230 Harbour Drive, Coffs Harbour, NSW, 2450 | www.ghd.com

Connect



[WATER](#) | [ENERGY & RESOURCES](#) | [ENVIRONMENT](#) | [PROPERTY & BUILDINGS](#) | [TRANSPORTATION](#)



GHD acknowledges the Traditional Owners of Country throughout Australia. We pay respect to their continuing culture and Elders past, present and emerging. [Click here to learn about our Reconciliation Action Plan.](#)

GHD

230 Harbour Drive
Coffs Harbour NSW 2450
T: 61 2 6650 5600 F: 61 2 6650 5601 E: cfsmail@ghd.com



© GHD 2019

This document is and shall remain the property of GHD. The document may only be used for the purpose for which it was commissioned and in accordance with the Terms of Engagement for the commission. Unauthorised use of this document in any form whatsoever is prohibited.

22-SO-976847825-

6/[https://projects.ghd.com/oc/Newcastle3/holcimdunloesandquar/Delivery/Documents/2220056_RP_T_Dunloe Heritage Management Plan.docx](https://projects.ghd.com/oc/Newcastle3/holcimdunloesandquar/Delivery/Documents/2220056_RP_T_Dunloe_Heritage_Management_Plan.docx)

Document Status

Revision	Author	Reviewer		Approved for Issue		
		Name	Signature	Name	Signature	Date
0	B Luffman	S Lawer	<i>S Lawer</i>	S Lawer	<i>S Lawer</i>	19/09/2019
1	B Luffman	S Lawer		S Lawer		18/12/2019

www.ghd.com

