

# **MARDIE SALT AND POTASH PROJECT**

# ABORIGINAL CULTURAL HERITAGE MANAGEMENT PLAN

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## **REVISION SUMMARY**

Section	Section Title	Key Changes		
1	Definitions	Language changes to reflect OMP Acknowledgement of changing legislation, including sections of ACHA and terms of reference		
2	Purpose	Reflecting upcoming Legislation changes and revised community expectations of standards around Heritage management Section removed outlining history of RRKAC NT claim area Outlines changed document review conditions		
3.1	Traditional Owner Groups	Grammatical changes		
3.3	Legislation	Inclusion of ACHA 2021		
4.1	Compliance with BCI Systems	Additional information to clarify purpose of INX		
5.1	Definition	Inclusion of definitions acknowledged in ACHA 2021		
5.2	Aboriginal Heritage Site/Place - Types	Updated to reflect AHA review		
5.2	Types	Comments re. forthcoming DPLH update of site types		
6	Consultation and Fieldworks	Table updated to reflect consultation undertaken November 2021 to July 2022		
7.1	Heritage Surveys - Framework	<ul> <li>Changed to reflect updated LAD with YM People</li> <li>Section added to include reference to intra-indigenous agreement between YM and RRK People</li> <li>Addition to reflect that WAC must ensure inclusion of RRK People on surveys as per intra-indigenous agreement</li> </ul>		
7.2	Heritage Surveys - Summary of Reports	<b>Table 3</b> - updated to include summaries of survey and salvage works undertaken in YM Determination Area		
7.2	Heritage Surveys - Summary of Reports	<b>Table 4</b> - updated to include summaries of survey and salvage works undertaken in RRK Area		
8	Summary of Section 18 Notices and Consents	<b>Table 5</b> – Relevant Conditions of Consent added <b>Table 5</b> – Notice Details added for 38619, 38638, and 38637 – not a site, rather a place and 17419 - name and consent date updated		
9	Summary of Heritage Finds	<b>Table 6</b> – updated to include additional survey results <b>Table 7</b> – updated to include additional survey results		
10.1	Key Hazards	Inclusion of reference to Tier 1,2 & 3 as per ACHA		
10.1	Measures to Protect Aboriginal Heritage – Key Hazards	<b>Table 8</b> – Extra Mitigation strategy added under direct human contact		
10.2	Measures to Protect Aboriginal Heritage – Heritage Sites Impacts and Management Strategies	Table 9 – Registered Site DPLH ID 17833 and 10536 inserted.  Registered Site DPLH ID 10537, 10351, 38619 status updated  OHP 22932 and 22933 stie descriptions updated – not reliably mapped on AHIS, no cultural salvage material found		
		OHP 38638 and OHP 38637 inserted		



10.5	Measures to Protect Aboriginal Heritage – Archaeological Salvage	<ul> <li>Updated to include terms of a section 18 or agreement with relevant Traditional Owner group</li> <li>Updated to outline salvage recording documentation</li> </ul>		
10.5	Measures to Protect Aboriginal Heritage – Archaeological Salvage	Table 10 - Salvage Heritage Places YM Salvage Report Date column added The following Salvage ID sites were updated:  • Mardie Salt Salvage Pt 13 -18 – relocation area added • Mardie Salt Salvage Pt 49 -70 added • Mardie Salt Salvage Pt 71-77 – relocation area added • Mardie Salt Salvage Pt 78 added • Mardie Salt Salvage Pt 79 to 83 – relocation area added • Mardie Salt Salvage Pt 84-89 – added • Mardie Salt Salvage Pt 90 to 93 – relocation area added • Mardie Salt Salvage Pt 93-97 – added • Mardie Salt Salvage Pt 98 to 100 – relocation area added • New Port Access Road – added		
10.6	Measures to Protect Aboriginal Heritage – Demarcation of Heritage Sites	All sites updated to include relocation area  Addition of 'in the Development Envelope' to clarify area covered.  Table 12 – Demarcation Sites Sites BCI121-01 to BCI121-07 added and relocation area added if relevant Mt Salt removed (outside Mardie Salt and Project footprint)		
10.7	Aboriginal Heritage Incidents	MC (Mardie Creek) Exclusion Zone 1-3 added Inclusion relevant sections of ACHA		
10.7	Aboriginal Heritage Incidents	Inclusion of PBC Heritage Manager to list of persons notified		
10.8	Measures to Protect Aboriginal Heritage – Discovery of Aboriginal Sites	Inclusion of ACHA		
10.9	Discovery of Human Remains	Inclusion of PBC Heritage Manager to list of persons notified		
10.10	Measures to Protect Aboriginal Heritage – Monitoring, Auditing and Reporting	Inclusion of auditing and reporting		
10.10	Monitoring, Auditing and Reporting	Inclusion of ACHA		



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## 1. **DEFINITIONS**

**Table 1: Definitions, Terminology and Abbreviations** 

Terminology or Abbreviation	Definition		
Aboriginal cultural heritage	Has the meaning given to it by the WA Heritage Act and includes Aboriginal Objects and Aboriginal Sites.		
Aboriginal Cultural Heritage Act 2021 (WA)/ACHA  The Aboriginal Cultural Heritage Act 2021 provides a modern framewo recognition, protection, conservation and preservation of Aboriginal cultural Heritage Act 2021 provides a modern framewo recognition, protection, conservation and preservation of Aboriginal cultural Heritage Act 2021 provides a modern framewo recognition, protection, conservation and preservation of Aboriginal cultural Heritage Act 2021 provides a modern framewo recognition, protection, conservation and preservation of Aboriginal cultural Heritage Act 2021 provides a modern framewo recognition, protection, conservation and preservation of Aboriginal cultural Heritage Act 2021 provides a modern framewo recognition, protection, conservation and preservation of Aboriginal cultural Heritage Act 2021 provides a modern framewo recognition, protection, conservation and preservation of Aboriginal cultural Heritage Act 2021 provides a modern framewo recognition, protection, conservation and preservation of Aboriginal cultural Heritage Act 2021 provides a modern framewo recognition, protection, conservation and preservation of Aboriginal cultural Heritage Act 2021 provides a modern framewo recognition, protection, conservation and preservation of Aboriginal cultural Heritage Act 2021 provides a modern framewo recognition and preservation of Aboriginal Cultural Heritage Act 2021 provides a modern framewo recognition and preservation of Aboriginal Cultural Heritage Act 2021 provides a modern framewo recognition and preservation of Aboriginal Cultural Heritage Act 2021 provides a modern framewo recognition and preservation of Aboriginal Cultural Heritage Act 2021 provides a modern framewo recognition and preservation and pre			
Aboriginal Heritage Act 1972 (WA)/AHA	The Aboriginal Heritage Act affords protection to all Aboriginal sites which can be determined to meet its section 5 definitions, irrespective of whether it is known; has been assessed by the ACMC; or is on the Register of Sites, until the ACHA comes into effect		
Aboriginal Heritage Site	Means an area identified to have cultural importance and significance to Aboriginal people. This includes but is not limited to registered heritage sites within the meaning of the AHA.		
Aboriginal object	Has the meaning given to it by the WA Heritage Act and includes any "Significant Aboriginal Object" as defined in the Commonwealth Heritage Act.		
Aboriginal site	Has the meaning given to it by the WA Heritage Act and includes:  (a) Any "Significant Aboriginal Area" as defined in the Commonwealth Heritage Act; and  (b) A "site of particular significance" within the meaning of section 237(b) of the Native Title Act,		
	Whether recorded or not.		
ACH	Means Aboriginal Cultural Heritage		
ACH Management Code	Has the same meaning as given in s100 of the ACHA		
ACHA	Means the Aboriginal Cultural Heritage Act 2021 (WA)		
ACHC	Aboriginal Cultural Heritage Council established under s20(1) of the ACHA		
ACHMP	Means an ACH Management Plan (the Plan, this Plan) as defined in s11 of the ACHA		
ACMC	Aboriginal Cultural Materials Committee		
Activities	Means Exempt, Tier 1, Tier 2 or Tier 3 Activities within the meaning given in s100 of the ACHA undertaken by the Company in relation to the Project in the ACHMP Area		
Agree Site Management	Means the Agreed Site Management Measures contained in this ACHMP.		
AHR	Aboriginal Heritage Regulations 1974 (WA)		
ASX	Australian Securities Exchange		
Avoidance	The relocation of Activities to avoid impacts on or harm to ACH and may include reasonable signage and fencing to protect the ACH from harm.		
BCI	BCI Minerals Limited (ASX – BCI) <u>www.bciminerals.com.au</u>		
Construction	Means the period, from start to finish, of any Activity associated with the construction or post-construction development of the Project for the purposes of Commercial Production, within the ACHMP Area		



Terminology or Abbreviation	Definition	
Consult	Has the same meaning as in s100 of the ACHA, and consultation has a corresponding meaning	
Contractor	Organisation engaged under contract by BCI including Contractor, Sub-Contractor, supplier, site supplier, vendor, seller	
Cultural Consultant	Means an RRK person nominated by the Interested Current PBC to assist in the assessment of the location and extent of any ACH within an Agreed ACHMP Area	
Department of Planning, Lands and Heritage/DPLH	The Department of Planning, Lands and Heritage (DPLH) means the department responsible for the administration of the Aboriginal Heritage Act 1972 (WA).	
Due Diligence Assessment	Has the same meaning as given in s	
Exclusion Zone	Areas required to be fenced or flagged or otherwise excluded from all Activitied in accordance with agreed site management measures.	
Ground Disturbance Permit/GDP	Means a permit to conduct work that impacts, marks or disturbs the ground issued pursuant to the Ground Disturbance Procedure.	
Ground Disturbing Project Operations	Means Project Operations that are not Low Impact Project Operations and which require machinery, earth moving and construction equipment, including track clearance, trenching, drilling, bulk sampling and construction works.	
Harm	Has the meaning given in s90 of the ACHA, and includes to destroy or damage ACH	
Heritage Team	Means the person/s within BCI (and subsidiary entities) responsible for managing the Aboriginal heritage process and impact assessments.	
High Impact Activities	Means Tier 2 or Tier 3 Activities	
Incident Notification Form	Means a notification in the form in Schedule 5	
Incident Reporting and Management Procedure	Means the Incident Reporting and Management Procedure in Schedule 4	
Interested Current PBC	Has the same meaning as defined in s135(1) of the ACHA	
Knowledge Holder	Has the same meaning as defined in s11 of the ACHA	
LAD	Land Access Deed	
Licence to Operate Register	The register of BCIs legal obligations and commitments	
Local Aboriginal Cultural Heritage Service (LACHS)	A designated Aboriginal corporation that facilitates management of cultural heritage for local Aboriginal people.	
Low Impact Project Operations	Includes aerial surveys, geological mapping, metal detecting, rock chip, hand specimen and soil and drainage sampling, only using hand-held tolls and nonground disturbing environmental, topographical, geophysical (including electrical and magnetic) and other surveys and anything necessary or incidental thereto.	
Mardie Project	Mardie Salt & Potash Project	
Mardie Salt Project/Project	As shown in Figure 1	
New Find	Means an object or a place, not previously identified, that is found during the conduct of Activities and is suspected to be ACH	



Terminology or Abbreviation	Definition		
New Find Preservation Zone	Means an area defined by a circle of ten metre radius centred on a New Find, or such area as determined by the Heritage Manager and agreed by the Company that is required to preserve and protect a New Find		
Optimised Mardie Project	Expansion of the approved Mardie Project (Ministerial Statement No. 1175) including expanded concentrator and crystalliser ponds, an increased solar salt and SoP production rate, new secondary seawater intake option, a port facility laydown area, a quarry, and minor changes to the dredge channel.		
Plan	Aboriginal Cultural Heritage Management Plan (ACHMP)		
Project Operations	Means the exercise of BCIs rights in the area where Mining Act tenure is held.		
Project Personnel	Staff, Contractors, Subcontractors, vendors, suppliers, and visitors to the Project		
Protected Area	Has the same meaning as defined in s11 of the ACHA		
Registrar	The person appointed under the ACHA to administer the Register of Aboriginal Sites along with perform other functions as allocated under the Act.		
Restricted Work Area (RWA)	Areas within which certain Activities are restricted in accordance with any Agreed Site Management Measures.		
RM/Registered Manager	Registered Manager means a person who is appointed registered manager of a mine under section 33 of the Mines Safety and Inspection Act 1994.		
RRK People	Robe River Kuruma People (formerly referred to as the KM People or Kuruma Marthudunera People), and "Robe River Kuruma person" means one of these people		
RRK Protected Area	Means an Exclusion Zone, a Restricted Work Area, or a Protected Area within the meaning of the ACHA that is within the RRK Area		
RRKAC	Robe River Kuruma Aboriginal Corporation RNTBC (ICN 8355, ABN 68 799 375 226)		
Salvage	May include collecting, bagging, tagging, cataloguing, or moving of an object of ACH from its location, and relocation to a safe place within the ACHMP Area decided by the Heritage Manager, a Heritage Officer, or a Nominated Senior Cultural Consultant (as the case may be) in agreement with the Company, which will not be unreasonably withheld		
Section 16 consent	Means, subject to section 18, the authorisation given by the Registrar under the Aboriginal Heritage Act 1972 to enter upon and excavate an Aboriginal site and the examination or removal of any thing on or under the site in such a manner and subject to conditions the ACMC advise.		
Section 18 consent	Means the consent given by the Minister for Aboriginal Affairs to the owner of any land to use the land subject of a heritage site for a specific purpose.		
Site	Mardie Salt & Potash Project area		
Tier 1 Activities	Has the same meaning given in s100 of the ACHA		
Tier 2 Activities	Has the same meaning given in s100 of the ACHA		
Tier 3 Activities	Has the same meaning given in s100 of the ACHA		
Traditional Owner groups  Refers to the YM People and the RRK People in their capacity as owners, native title holders, agreement counterparts and custod the subject of the Mardie Salt Project.			
WAC Wirrawandi Aboriginal Corporation ICN 8870			
YM People	Yaburara & Mardudhunera People		



## 2. PURPOSE

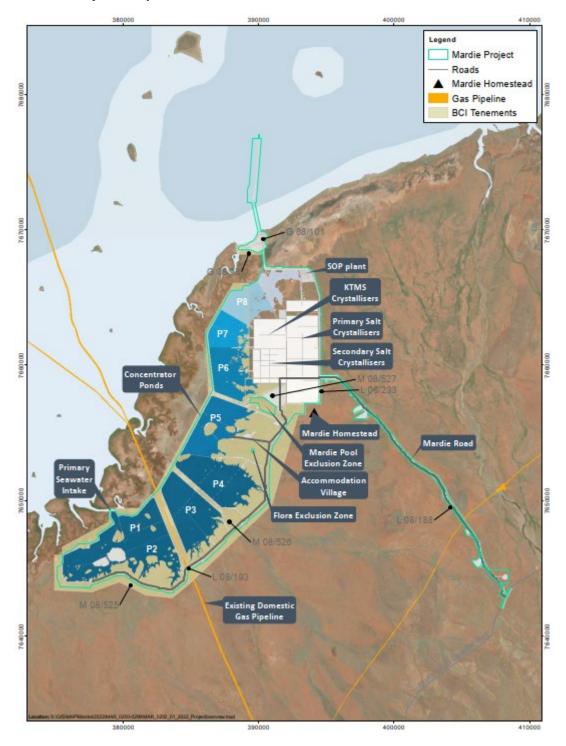
The heritage management system at the Mardie Project consists of the executed LADs and this Plan to achieve the outcomes of Ministerial Statement No. 1175, Assessment No. 2336 (Optimised Mardie Project) and the Environmental Protection Authority's objectives for Social Surroundings.

This Plan describes the process for the ongoing management of Aboriginal heritage places located within BCI's Project as shown in Figure 1. This Plan sets out steps to be followed by the company, contractors and all employees to identify and manage Aboriginal heritage that may be affected by the Project in a manner that complies with Legislation, the LADs with the relevant Traditional Owner groups and the commitments made to these groups.

This Plan sets BCI's requirements for Project Personnel and goes beyond the minimum legislative requirements and is intended to reflect best practice and what is expected by Traditional Owner groups to manage and protect Aboriginal heritage. It is noted that the Legislation that governs the protection and management of Aboriginal heritage in WA is in the process of being repealed and the State is currently in a transition period between the AHA and the Aboriginal Cultural Heritage Act 2021. When implementing this Plan, regard will be had to this fact, and it is recognised that mere compliance with Legislation may fall short of the standard reasonably expected of a good corporate citizen such as BCI.



**Figure 1: Mardie Project Footprint** 



As shown in Figure 2, this Plan covers Project areas within the Yaburara & Mardudhunera Native Title determination area. A very small portion in the southwest of the Project has no current native title claim or determination; however, BCI recognise the enduring connection the RRK People have to this area and formally recognise this, including their rights and obligation to speak for cultural heritage in this area.

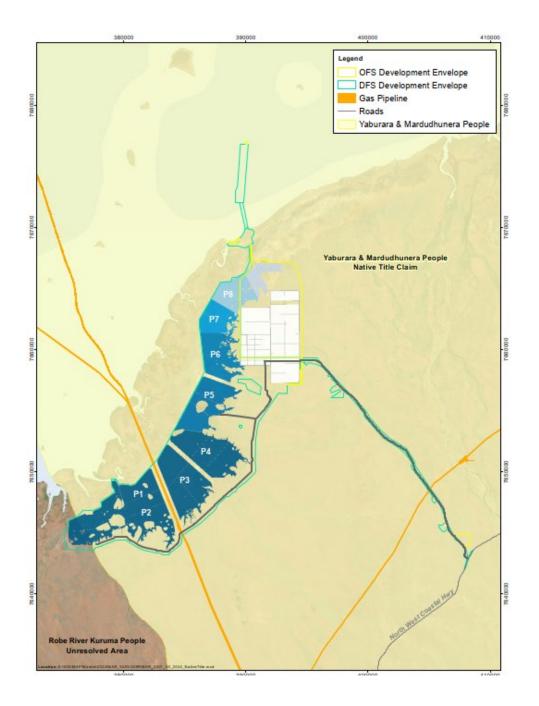
As a party to the agreements made with the Traditional Owner groups, BCI will be responsible for facilitating implementation of the agreement requirements within the Project and will ensure that all project contractors and personnel also abide by the agreement requirements.



This Plan has been developed based on the findings of Aboriginal heritage surveys including archaeological and ethnographic assessments and consultation with Aboriginal stakeholder groups.

This Plan is an evolving document and will continue to be updated as more information becomes available about the places, sites and cultural heritage aspects, of the Project area, and further consultation, assessment and salvage is undertaken with the Aboriginal stakeholder groups. It will also be reviewed in conjunction with Traditional Owner groups upon significant legislative or policy change in line with community expectations and standards.

**Figure 2: Native Title Determination Boundaries** 





#### 3. COMPANY COMMITMENTS AND OBLIGATIONS

## 3.1 Traditional Owner groups

The Project area affects land in which the YM People has Native Title Determination (WAD127/1997). The YM People and RRK People have shared rights in relation to historical overlap of areas which cover the Project. BCI formally recognise the RRK People's enduring connection to the area and to the Unresolved Area to the south, identified in Figure 2.

As part of the YM determination, both YM People and RRK People are responsible protection of country and cultural heritage and have agreed processes for how Traditional Owners manage heritage. These processes are to be followed by WAC in managing heritage.

#### 3.2 Land Access Deeds

BCI has entered into a LAD with the YM People (executed November 2012) and another LAD with the RRK People (executed October 2012). A framework for consultation with Traditional Owners is set out in these Deeds along with key obligations for all parties on a range of matters including the management of impacts of the Project on Aboriginal heritage.

As part of its agreement with the Traditional Owner groups, BCI has committed to:

- Maintain timely, open and flexible communication with the Aboriginal stakeholder groups.
- Consult with the Traditional Owner groups in relation to the management of Aboriginal heritage
  in their respective areas throughout the life of the project in the agreed manner, including but not
  limited to:
  - Consultation methods such as a minimum of two Implementation Committee meetings per year, and
  - Continued access to country for traditional laws and customs.
- Endeavour to avoid identified Aboriginal sites where possible, however, should this prove not possible, a section 18 under the Aboriginal Heritage Act (1972) will be applied for.
- Fulfil its statutory obligations under the Aboriginal Heritage Act (1972) and exceeding its statutory obligations in terms of best practice heritage management

## 3.3 Legislation

The following legislation may apply in relation to the impact of the Project on Aboriginal Heritage:

- Aboriginal Cultural Heritage Act 2021 (WA) (ACHA)
- Aboriginal Heritage Act 1972 (WA) (AHA)
- Aboriginal Heritage Regulations 1974 (WA)
- Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)
- Criminal Code Compilation Act 1913 (WA)
- Coroners Act 1996 (WA)
- Native Title Act 1993 (Cth)



#### 4. PROJECT PERSONNEL RESPONSIBILITY

## 4.1 Compliance with BCI Systems

BCI subsidiaries and Project Personnel undertake to abide by and use BCI policies, systems and procedures. All discussion in this Plan referring to systems, data recording, reporting, analysis, document filing, records management, etc. refers to the use of BCI's intranet/internet-based information management system "INX – InForm".

Although Contractors must have their own management plans and systems, all recorded data, hazards/risks observations, assessments, reports, investigations, findings, etc. relating to Project work is entered into INX – InForm to ensure compliance with BCI policies, systems and procedures.

Project Personnel must comply with this Plan along with:

- Incident Reporting and Management Procedure BCI-WHS-PR-009 Rev 0 (Appendix A)
- Cultural Heritage Policy (Appendix B)
- Ground Disturbance and Topsoil Stockpiling Work Instruction BCI-ENV-PRO-001 (Appendix C)
- Demarcation and Survey Procedure WIN-0000-CI-PRO-001 (Appendix D)
- Aboriginal Heritage Management Guidelines for Contractors MAR-PRJ-CPR-005 (Appendix E)

This will ensure that Aboriginal heritage obligations that apply to the Project are upheld and respected.

## 4.2 Roles and Responsibilities

The Contractor shall describe the roles and responsibilities of its key Project Personnel who will manage compliance under this Plan.

## 4.3 Induction and Cultural Awareness Training

Before commencing work on site, all Project Personnel must undergo a formalised and mandatory site induction, which will include specific information regarding the Aboriginal heritage values within the Project area and the obligations of all personnel under the AHA. Any Project Personnel conducting work on site for a period over three weeks during the construction and operation phase will be required to complete cultural awareness training within six months of commencing site work.

The purpose of these inductions and training is to increase awareness of Aboriginal culture, and to demonstrate the cultural differences that may arise between a person's own culture and Aboriginal culture and formulate strategies to accommodate these differences. The cross-cultural training program will be developed and delivered in consultation with the Traditional Owner groups

#### 4.4 Communication

Project Personnel will continuously communicate with its personnel to facilitate effective implementation of this Plan, including toolbox and prestart meetings held regularly by each construction crew which will contain appropriate heritage issues based on heritage consideration associated with the proposed activities.

For example, heritage topics may include:

- New heritage management procedures or information.
- Avoidance of sites as communicated in Ground Disturbance Permits.



- Hazard Assessments including consideration of potential heritage impacts.
- Briefing on heritage incidents that have occurred, including actions taken.
- Addressing questions and concerns raised by personnel.
- Reiteration of heritage management information.

## 5. ABORIGINAL HERITAGE SITE / PLACE

#### 5.1 Definition

The definition of what constitutes an Aboriginal site as defined by Section 5 of the AHA, and in s314 of the ACHA, is set out as follows:

- a. Any place of importance and significance where persons of Aboriginal descent have, or appear to have, left any object, natural or artificial, used for, or made or adapted for use for, any purpose connected with the traditional cultural life of Aboriginal people, past or present.
- b. Any sacred, ritual or ceremonial site, which is of importance and special significance to persons of Aboriginal descent.
- c. Any place which, in the opinion of the Registrar, is or was associated with Aboriginal people and which is of historical, anthropological, archaeological or ethnographic interest and should be preserved because of its importance and significance to the cultural heritage of the State.
- d. Any place where objects to which the Act applies are traditionally stored, or to which, under the provisions of this Act, such objects have been taken or removed.

BCI also recognises that the Aboriginal people take a broader approach to heritage and cultural values. BCI recognises that Aboriginal people have different views on their own definition of a cultural heritage site and that this perspective sees Aboriginal cultural heritage sites inextricably linked with the environment and the health of country. Aboriginal people see their sites in relation to one another, linked across the landscape, rather than individually.

## 5.2 Types

A diverse range of places can comprise Aboriginal heritage sites. However, they fall into two basic but overlapping categories: archaeological and ethnographic sites. The following terminology of Aboriginal sites has been taken from the DAA website (2010). BCI recognises that Aboriginal people view archaeological and ethnographic sites differently and such sites may not fall neatly or at all into the following descriptors.

- <u>Archaeological sites:</u> Places where cultural material remains are associated with past Aboriginal land use. These may include:
  - **Structure:** This is a generic label used to describe a range of archaeological features including those interpreted as lizard 'habitats', hunting blinds and stone arrangements.
  - **Fish traps:** Often stone structures constructed in tidal ocean, river and estuary environments and inland drainage features.
  - Modified Trees: These are trees that show evidence of having been carved or scarred for the purpose of creating territorial markers, the extraction of raw material for the production of items of material culture (such as bowls or shields).
  - Painting: Aboriginal paintings were undertaken on a wide variety of media, but are best known from rock shelters, caves and overhangs where they are protected from the detrimental effects of the weather. A wide variety of motifs, including anthropomorphic, animal and geometric figures were used; stencilled objects are also common.



- Engraving: Places where designs are carved, pecked or abraded into a rock surface.
- Grinding patches / grooves: These generally take the form of circular smooth depressions found on rocky exposures and are thought to represent activities relating to the production of 'food'.
- Quarry: These sites can take several forms. In most cases they comprise surface hardstone
  exposures, which were exploited as a raw material for the manufacture of stone artefacts.
  Ochre and other mineral pigments were also exploited, usually being mined from naturally
  occurring deposits.
- Artefact Scatters: Stone artefact scatters are the most common archaeological component represented throughout Western Australia. In most cases they comprise a surface scatter of stone artefacts, although a sub-surface component may also be present, particularly in depositional environments such as those found in the coastal and sub-coastal areas. Such deposits are particularly significant in terms of the potential afforded for dating the site and examining change over time.
- Middens: Such sites consist of scatters of humanly deposited shell, usually with a stratified component.
- <u>Ethnographic sites:</u> Places of spiritual importance to Aboriginal people (for religious or other reasons). Such places may have no distinguishing characteristics to alert non-Aboriginal people to their existence. These may include:
  - Ceremonial: These are places that have been used for ceremonial purposes. Although such sites can sometimes be identified by the presence of stone arrangements or modelling of the ground surface, many can only be located through consultation with people who have either direct or indirect knowledge of such sites.
  - **Mythological:** These sites generally encompass some natural feature, such as a hill or waterway, which is considered significant to contemporary Aboriginal people.
  - Burials: These are generally difficult to identify unless explicitly distinguished by some sort
    of marker, are known to family and / or community members, or have been recorded in a
    documentary or oral format.

#### 6. CONSULTATION AND FIELDWORKS

Table 2 lists the more significant events and timeline of the consultation process between BCI and the YM People and RRK People to date. Consultation is ongoing and as the project evolves, additional events will be added to Table 2.

**Table 2: Summary of Consultations and Fieldworks** 

GROUP	DATE OF CONSULTATION	CONSULTATION DETAILS	
YM People	August 2017	Mardie Project Briefing	
RRK People	September 2017	Mardie Project Briefing	
YM People	September 2017	Heritage Constraints Assessment	
RRK People	September 2018	Heritage Survey	
YM People	December 2018	Work Program Clearance	
YM People	March 2019	Land Access Deed Negotiations	



GROUP	DATE OF CONSULTATION	CONSULTATION DETAILS		
RRK People	May 2019	Aboriginal Archaeological Work Area Clearance survey		
YM People	July 2019	Salt Royalties Negotiations		
YM People	July 2019	Section 18 Consultation Meeting		
YM People	August 2019	Salvage and Relocation		
YM People	August 2019	Work Program Clearance		
YM People	September 2019	Salt Royalties Negotiations		
RRK People	July 2020	Archaeological and Ethnographic Site Avoidance survey		
YM People	July 2020	Aboriginal Heritage Survey		
YM People	September 2020	Aboriginal Heritage Survey		
YM People	September 2020	Section 18 Consultation Meeting		
RRK People	October 2020	Section 18 Consultation Meeting		
YM People	November 2020	WAC Port Negotiations		
RRK People	December 2020	Implementation Committee Meeting		
YM People	January 2021	WAC Board Meeting		
YM People	January 2021	Site Avoidance Aboriginal Heritage Survey		
YM People	February 2021	Aboriginal Heritage Survey		
YM People	March 2021	Aboriginal Heritage Survey		
RRK People	March 2021	Mardie Project Due Diligence Meeting		
YM People	March 2021	WAC Port Consultation		
YM People	March 2021	WAC Environmental Footprint Consultation		
YM People	April 2021	WAC Port Negotiations		
YM People	May 2021	Aboriginal Heritage Survey		
YM People	June 2021	WAC Members Consultation		
RRK People	September 2021	Section 18 Reaffirmation Meeting		
RRK People	October 2021	Implementation Committee Meeting		
RRK People	November 2021	Archaeologist Survey		
RRK People	November 2021	Supplementary Agreement   Accession Deed Discussion		
YM People	November 2021	WAC Community Meeting Port ILUA and Restated LAD Consultation		
RRK People	November 2021	Ethnographic Survey		
RRK People	December 2021	Cultural Heritage Management Plan Consultation		
YM People	December 2021	Cultural Heritage Management Plan Consultation		
RRK People	December 2021	Archaeological Salvage		
YM People	December 2021	Aboriginal Survey and Salvage		
YM People	December 2021	WAC consultation – Mardie Pool groundwater drilling		
YM People December 2021		Cultural Awareness Training video consultation		



GROUP	DATE OF CONSULTATION	CONSULTATION DETAILS	
RRK People	December 2021	Cultural Awareness Training video consultation	
RRK People	January 2022	BCI21-05 Discussion	
RRK People	February 2022	BCI21-05 Site Recording	
YM People	February 2022	Salvage and Relocation	
RRK People	February 2022	Site Recording	
YM People	February 2022	Implementation Committee Meeting	
RRK People	March 2022	Pre-Implementation Committee Meeting Discussion	
RRK People	March 2022	Implementation Committee Meeting	
YM People	May 2022	Implementation Committee Meeting	
YM People	June 2022	Salvage and Relocation	
YM People	July 2022	Survey, Salvage and Relocation	
YM People	August 2022	Community Day – Traditional Owner site visit	
YM People	September 2022	Implementation Committee Meeting	
YM People	September 2022	Salvage and Relocation	

## 7. HERITAGE SURVEYS

#### 7.1 Framework

BCI entered a LAD with the YM People (restated and executed in December 2021) and the RRK People (executed October 2012) which sets out key obligations on a range of matters including the management of impacts of the Project on Aboriginal heritage.

BCI also acknowledges that the YM People and RRK People have an intra-indigenous agreement, known as the KM YM ILUA which governs how heritage is addressed between the YM People and RRK People over much of the Mardie Project Area.

BCI must issue a written notice setting out the nature and location prior to conducting any Low Impact Project Operations. WAC or RRKAC as appropriate have 10 business days to advise whether the works will impact on any Aboriginal sites.

Prior to conducting any Ground Disturbing Project Operations, BCI must provide written notice to the WAC or RRKAC as appropriate setting out the works proposed to be undertaken and provide a statement of whether a heritage survey is required. When a heritage survey is required, BCI must provide a methodology and the date BCI proposes that the heritage survey commences. WAC or RRKAC as appropriate are required to provide a list of up to six Aboriginal Consultants and heritage professionals, a date and estimate of reasonable fees and expenses within ten business days. BCI acknowledge that WAC must comply with the KM & YM ILUA when establishing survey teams.

Should the Traditional Owners disagree with a statement in the written notice that a heritage survey is required they must, within ten business days, give BCI written notice setting out the reason.



BCI commits to adhering to the conclusions, recommendations and conditions contained in heritage survey reports.

#### **Summary of Heritage Survey Reports** 7.2

The following Tables list the timeline and report titles for the formal heritage surveys carried out to date; Table 3 lists the summary of final heritage survey reports for the YM People and, Table 4 lists the summary of final heritage survey reports for the RRK People. If additional formal heritage surveys are carried out, this plan and Tables 3 and 4 will be updated accordingly.

Table 3: Summary of Final Heritage Survey Reports – YM Determination Area

DATE	AUTHOR	CONSULANTCY	METHOD	REPORT TITLE
September 2017	Damien Lafrentz	Horizon Heritage Management		Heritage Constraints Assessment for BC Iron Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, September 2017
December 2018	Damien Lafrentz, Philippa Hunter & Nigel Tonkin	Horizon Heritage Management	Ethnographic and Archaeological	Work Program Clearance for the Yaburara & Marthudunera People and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, December 2018
August 2019	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Salvage and Relocation	Salvage and Relocation Report of the Mardie Salt Project Area, South of Karratha, Western Australia, August 2019
August 2019	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Ethnographic and Archaeological	Work Program Clearance for the Yaburara & Marthudunera People and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, August 2019
July 2020	Damien Lafrentz & Nigel Tonkin	Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, July 2020
September 2020		Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, September 2020



DATE	AUTHOR	CONSULANTCY	METHOD	REPORT TITLE
January 2021	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Ethnographic and Archaeological	Site Avoidance Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, January 2021
February 2021	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, February 2021
March 2021	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, March 2021
May 2021	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, May 2021
August 2021	Damien Lafrentz	Horizon Heritage Management	Salvage and Relocation	Wirrawandi Aboriginal Corporation Salvage and Relocation Report of the Mardie Salt Project Area, South of Karratha, Western Australia, August 2021
August 2021	Damien Lafrentz & Aaron Floky	Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, July & August 2021
October 2021		Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Ltd for the proposed Mardie Salt Project, south of Cape Preston, WA, October 2021



DATE	AUTHOR	CONSULANTCY	METHOD	REPORT TITLE
December 2021		Horizon Heritage Management	Survey and Section 18 Cultural Salvage	Site Avoidance Aboriginal Heritage Survey and Section 18 Cultural Salvage for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, December 2021
February 2022	Carly Sims	Horizon Heritage Management	Survey and Section 18 Cultural Salvage	Site Avoidance Aboriginal Heritage Survey and Section 18 Cultural Salvage for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, February 2022
June 2022	Damien Lafrentz & Aaron Floky	Horizon Heritage Management	Salvage and Relocation	Wirrawandi Aboriginal Corporation Survey and Cultural Salvage Relocation report at the BCI Minerals Mardie Salt Project, south of Karratha, Western Australia, June 2022
September 2022	Damien Lafrentz & Aaron Floky	Horizon Heritage Management	Salvage and Relocation	Wirrawandi Aboriginal Corporation Cultural Salvage Relocation report at the BCI Minerals Mardie Salt Project, south of Karratha, Western Australia, September 2022

Table 4: Summary of Final Heritage Survey Reports – RRK Area

DATE	AUTHOR	CONSULTANCY	METHOD	REPORT TITLE
May 2019	Wendy Ryan	Gavin Jackson Cultural Resource Management	Archaeological	A Report of the Aboriginal Archaeological Work Area Clearance survey within the BCI Mardie Salt and Potash Project Area, Pilbara, Western Australia
June 2019	Edward M. McDonald	Ethnosciences	Ethnographic	Report on an Ethnographic Site Avoidance Survey of BCI's Mardie Salt & Potash Pilbara, Western Australia
July 2020	John Cecchi	JCHMC	Archaeological and Ethnographic	Report of an Archaeological and Ethnographic Site Avoidance Survey of BCI Minerals Limited Mardie Project



DATE	AUTHOR	CONSULTANCY	METHOD	REPORT TITLE
November 2021	Ryan Hovingh	Snappy Gum Heritage Services	Salvage of Isolated Finds	Preliminary Advice of the Salvage of Isolated Finds within BCI Minerals Limited's Mardie Salt Project, southwest of Karratha – November 2021
November 2021	Olivia Norris – Robin Stevens	Stevens Heritage Services	Ethnographic Site Identification Heritage Survey	Report of a Kuruma and Marthudunera Ethnographic Site Identification Heritage Survey at BCI Minerals Pty Ltd's Mardie Salt and Potash Project in the West Pilbara Region of Western Australia
November 2021	Ryan Hovingh	Snappy Gum Heritage Services	Archaeological Survey	Preliminary Advice of the Work Program Clearance Archaeological Survey within the BCI Minerals Limited Mardie Salt Project, southwest of Karratha – November 2021
September 2022	Ryan Hovingh	Snappy Gum Heritage Services	Archaeological Survey, Site Recording and Salvage	Report on the Archaeological Survey, Site Recording and Salvage within the BCI Minerals Limited Mardie Salt Project, southwest of Karratha – November 2021 – March 2022.

#### 8. **SUMMARY OF SECTION 18 NOTICES AND CONSENTS**

Table 5 lists the Section 18 notices and consents that apply to works within the Project.



**Table 5: Section 18 Notices and Consents** 

REFERENCE NUMBER	NOTICE DETAILS	CONSENT DATE	CONSENT DETAILS	RELEVANT CONDITIONS OF CONSENT
S18-69-17160	ID 11409 (Mardie Station A) ID 11410 (Mardie Station B)  *June 2021 update – 11409 and 11410 removed from the Register of Aboriginal Heritage Places and Objects ID 17833 (Tap Site 2 – not a site, rather a place) ID 22932 (Hadson 2 – not a site, rather a place) ID 22933 (Hadson Midden 1)	22-Jan-20	For the development, operation, maintenance and decommissioning of the Mardie salt and potash project including: feasibility investigations including establishing access tracks, conducting site trials, clearing/construction of access tracks/roads to support project construction and operation, construction of pump stations, solar evaporation ponds, crystalliser ponds and processing plants, construction of supporting infrastructure including but not limited to accommodation village, administration facilities, laboratory, electrical power generation and distribution, waste water treatment plant, waste facilities, communication facilitates and maintenance workshops and operation and maintenance of the above and decommissioning and rehabilitation of the above	Provide in writing, the opportunity for Y&M representatives to conduct salvage of Aboriginal sites ID 11409 (Mardie Station A) and ID 11410 (Mardie Station B).



REFERENCE NUMBER	NOTICE DETAILS	CONSENT DATE	CONSENT DETAILS	RELEVANT CONDITIONS OF CONSENT
MIN-2020- 1715	10351 (Wiruwandi Plain) 10536 (Gas Pipeline 39) 10537 (Gas Pipeline 40)  * 38619 (Mardie Salt Thalu 01 – removed from application, not to be disturbed) 38638 (Mardie Salt 01 – not a site, rather a place) 38637 (Mardie Salt 02 – not a site, rather a place)	10-Feb-22	For the development, operation, maintenance and decommissioning of the Mardie salt and potash project including: clearing/construction and upgrade of Mardie Road; minor grading / reshaping of the road to improve safety, installation of fencing along the road; installation of cattle grids along the road, increase road width to 10m (1 lane each way), improve road surface (remains unsealed), maintain current rout of road, some corners may be slightly modified in order to achieve design speed compliance, new material for the road will be sourced from borrow areas along the road alignment, construction water for road upgrade will be sourced from bores (to be sunk still) along the road; construction of crystalliser ponds; construction of gas pipeline; operation and maintenance of the above; and decommissioning and rehabilitation of the above.	Invites, in writing, two Y&M representatives to be present for ground disturbing works on the Land where it intersects Aboriginal sites ID 10351 (Wiruwandi Plain), ID 10536 (Gas Pipeline 39) and ID 10537 (Gas Pipeline 40).  Invites, in writing, Y&M representatives to undertake an agreed method of cultural salvaging of Aboriginal sites ID 10351 (Wiruwandi Plain), ID 10536 (Gas Pipeline 39) and ID 10537 (Gas Pipeline 39) and ID 10537 (Gas Pipeline 40), which are to be relocated to a nominated location for safe keeping.



REFERENCE NUMBER	NOTICE DETAILS	CONSENT DATE	CONSENT DETAILS	RELEVANT CONDITIONS OF CONSENT
MIN-2020- 1714	17429 (Nyungarrarra (Peters Creek))	28-Jan-22	For the development, operation, maintenance and decommissioning of the Mardie Salt and Potash Project including: construction of a pond wall (4.2m high and 3-4m in width) for the purpose of holding sea water; construction of the pond wall will result in diversion of water flows from Peters Creek to the southern boundary of pond 1 towards the coast; operation and maintenance of the pond wall and decommissioning and rehabilitation, post mine closure.	Invites, in writing two RRK (formerly K&M) representatives to be present for ground disturbing works on the Land where it intersects with the boundary of Aboriginal site ID 117429 (Nyungarrarra (Peters Creek)).

## 9. SUMMARY OF HERITAGE FINDS

Table 6 (RRK) and Table 7 (YM) summarise the heritage finds within the Project to date.

Table 6: Summary of Heritage Finds – RRK Area

RRK People					
Category	Identified	Subject to s18 consent			
Artefact scatter / Quarries	30 locations, multiple artefacts	-			
Engravings	-	-			
Grinding Base	13	-			
Ethnographic Place	-	-			
Shell scatter	16	-			
Water Source	-	-			
Mythological	4	1			



Table 7: Summary of Heritage Finds – YM Determination Area

YM People					
Category	Identified	Subject to s18 consent			
Artefact Scatter / Quarries	114	2			
Engravings	0	0			
Grinding Base	13	2			
Ethnographic Place	1	0			
Shell scatter	16	0			
Water Source	9	0			
Mythological	4	2			

## 10. MEASURES TO PROTECT ABORIGINAL HERITAGE

## 10.1 Key Hazards

Construction will involve Tier 1, 2 and 3 ground disturbing activities and other general access requirements, which will change from time to time as the construction programme evolves. Table 8 lists the generic key hazards expected during construction, and the mitigating strategies to be put in place. Project Personnel will be required to abide by all GDP conditions (refer section 10.3), to ensure these key hazards are managed appropriately and to avoid any potential impacts.

**Table 8: Key Hazards to Aboriginal Heritage During Construction** 

KEY HAZARDS	MITIGATION STRATEGIES
Vehicle / machinery activity	Vehicle and machinery movements limited to areas that have been subject to heritage clearance.
,	<ul> <li>Issuing of ground disturbing permits which clearly delineate approved areas for ground disturbance and outline heritage restrictions.</li> </ul>
	Demarcation of heritage places and sites as required, to avoid indirect disturbance.
	Salvage of materials where requested by the Traditional Owner groups.
Vegetation clearing	<ul> <li>Vegetation clearing limited to areas that have heritage clearance.</li> </ul>
	<ul> <li>Issuing of ground disturbing permits which clearly delineate approved areas for ground disturbance and outline heritage restrictions.</li> </ul>
	Demarcation of heritage places and sites as required, to avoid indirect disturbance.
	Salvage of materials where requested by the Traditional Owner groups.
Earthworks	Earthworks limited to areas that have been subject to heritage clearance.
	<ul> <li>Issuing of ground disturbing permits which clearly delineate approved areas for ground disturbance and outline heritage restrictions.</li> </ul>
	Demarcation of heritage places and sites as required to avoid indirect disturbance.
	Salvage of materials where requested by the Traditional Owner groups.
Maintenance and	Construction activities limited to areas that have been subject to heritage clearance.
construction activities	Issuing of ground disturbing permits which clearly delineate approved areas for
	ground disturbance and outline heritage restrictions.
	Aboriginal monitors to be engaged in highly sensitive areas.
	Demarcation of heritage places and sites as required to avoid indirect disturbance.
	Salvage of materials where requested by the Traditional Owner groups.



KEY HAZARDS	MITIGATION STRATEGIES
Direct human contact	<ul> <li>Demarcation of heritage places and sites as required, to avoid indirect disturbance.</li> <li>All BCI personnel and contractors will attend compulsory inductions prior to commencing site work and will undergo training in relation to cultural heritage obligations under this Plan.</li> <li>Any personnel conducting work for over one month will also be required to participate in cultural awareness training to improve their understanding of cultural heritage values within the area.</li> <li>All BCI personnel adhering to walk and driving tracks.</li> </ul>
Generation of dust and vibration (operation of heavy machinery / blasting)	<ul> <li>Site specific rules to restrict site personnel from accessing specified places.</li> <li>Ongoing monitoring of dust and vibration levels and inspection of heritage places in proximity.</li> </ul>
Changes in hydrology	Ongoing monitoring of water levels.

## 10.2 Heritage Sites Impacts and Management Strategies

Table 9 lists the heritage sites (by specific ID number) for the Project. The table includes all identified cultural material including previously identified DPLH sites and newly recorded places, along with the expected extent of impact by the Project and the proposed mitigating strategies. BCI also recognises sites of significance to the YM People and RRK People which are included in Table 12. As discussed in Section 10.1 above, the Heritage Team will work with Project Personnel to assess the potential impact to the listed heritage sites for their workplaces, and which will result in workplace specific mitigating actions.

Figure 3 Section 18 status and Figure 4 Heritage status are detailed maps of the Project area. These maps are included to provide a visual representation of the heritage sites and places identified within the Project area.



**Table 9: Heritage Sites Impacts and Management Strategies** 

Heritage place ID	Site Status	Туре	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
17429	Registered	Mythological, Named Place	Peter's Creek – Peters Creek was recorded in 1994 by McDonald, Hales and Associates during a survey of the northern section of the Goldfields Gas Transmission Project. The Peters Creek site has a Mardudhunera name which is Nyungarrarra (meaning 'blue sky').	Partial impact – The Land will be impacted by the construction of the pond wall, which will result in the diversion of water from Peters Creek for the operation of the Mardie Salt Project. Diversion of water from Peters Creek.	Section 18 MIN-2020-1714 – not yet disturbed
10536	Registered	Artefact/Scatter	The site was recorded by archaeologist Nigel Tonkin and anthropologist Damien Lafrentz in co-operation with YM Traditional Owners in July 2020 DPLH 10536 Gas Pipeline 39 consists of sparse grinding material including mullers, grind stones and hammer stones. A low density artefact scatter is also present	Partial impact – Mardie Road intersects site The Land will be impacted by the construction/clearance and upgrade of the existing Mardie Road and gas pipeline. A salvage program will be arranged prior to disturbance.	Section 18 MIN-2020-1715 Cultural salvage and relocation complete Not yet disturbed



Heritage place ID	Site Status	Туре	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
10537	Registered	Artefact/Scatter	The site was recorded by archaeologist Nigel Tonkin and anthropologist Damien Lafrentz in co-operation with YM Traditional Owners in July 2020DPLH 10537 Gas Pipeline 40 consists of sparse grinding material including mullers, grind stones and hammer stones. A low density artefact scatter is also present	Partial impact — Mardie Road intersects site The Land will be impacted by the construction/clearance and upgrade of the existing Mardie Road and gas pipeline. A salvage program will be arranged prior to disturbance.	Section 18 MIN-2020-1715 Cultural salvage and relocation complete Not yet disturbed
10351	Registered	Mythological	Wiruwandi Plain – This registered mythological site was recorded by Dr Palmer in 1975 and later by Brown in 1979. It extends from Wearawandie Well in the south to Mardie Wool Shed in the north and west of the Mardie-North West Costal Highway Road. It forms part of the Wiruwandi (Boomerang Wood) Dreaming which also includes a hill and a pool. The Plain is located adjacent to the Mardie Salt Project. This site has significance to the YM Aboriginal people as a mythological dreaming story site	Partial impact – Mardie Road intersects site The Land will be impacted by the construction/clearance and upgrade of the existing Mardie Road and gas pipeline.	Section 18 MIN-2020-1715 Disturbance partially complete
38618	Registered	Artefacts/Scatter	Mardie Salt 04 – Artefacts/Scatter	No impact	Demarcation and site avoidance



Heritage place ID	Site Status	Туре	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
38619	Registered	Ceremonial, Mythological	Maride Salt Thalu 01 – The site was recorded by archaeologist Nigel Tonkin and anthropologist Damien Lafrentz in co-operation with YM Traditional Owners in July 2020 Mardie Salt Thalu 01 is a Thalu weather site used to increase rain and thunder to help maintain country. It is a naturally occurring iron stone outcropping with the main focus being a large boulder at 397738E 7656806N close to the existing Mardie Road	No impact	Demarcation and site avoidance
6322	Registered	Artefacts/Scatter, Ceremonial, Grinding Patches/Grooves, Midden/Scatter, Skeletal Material/Burial, Camp	Mardie Creek Burial – The burial (human cranium/skull) is located further west from Mardie Pool closer to the coastal tidal zone on a sand ridge covered with spinifex scrub. A low density artefact and shell scatter is noted around the burial area. An extremely large (24pprox 500 m x 100 m) high density artefact and shell scatter (Saccostrea spp. Terebralia spp. Anadara spp. And Melo spp.) site numbered in the thousands is found between the burial and Mardie Pool along the northern bank of the Mardie Creek	No impact	Site exclusion zone



Heritage place ID	Site Status	Туре	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
17833	Other Heritage Place	Artefact/Scatter, Shell	Tap Site 2 – Recorded by Lantzke in 1999 during an archaeological survey of the Mardie Gasfield Exploration Programme. The site consists of a small scatter of shells and flaked stone artefacts made from chert, dolerite and basalt. It is located on the shore of a salt flat island at 378938E 7646377N	Fully disturb	Cultural salvage and relocation completed Disturbance completed
26578	Other Heritage Place	Artefacts/Scatter, Historical, Midden/Scatter, Mythological, Named Place, Natural Feature, Plant Resource, Water Source	Wirawundi Pool – Recorded in 2009 by AIC anthropologist Alex Lyneham and Mardudhunera Elder Dorrie Wally. Wirawundi is the Mardudhunera name for Mardie. This pool was utilised by Mardudhunera people for water, food and recreation (swimming). It holds great value to many generations of Mardudhunera people and those that worked on the station. There is a creation story (Boomerang) and women's birthing associated with the pool.	No impact	Site exclusion zone
22932	Other Heritage Place	Artefacts/Scatter	Hadson 2 – Recorded in 1990 by Murphy and McDonald in conjunction with representatives from the Mardudhunera group. This artefact scatter consists of flaked stone artefacts and shell fragments (Melo spp. Anadara spp.) on a sand plain in a coastal flat. It is located at 378280E 7647309N.	Fully disturb	The reliable coordinates given on the AHIS are incorrect. No cultural material is located at this location



Heritage place ID	Site Status	Туре	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
22933	Other Heritage Place	Artefacts/Scatter, Midden/Scatter	Hadson Midden 1 – Recorded in 1990 by Murphy and McDonald in conjunction with representatives from the Mardudhunera group. This artefact scatter and midden consists of flaked stone artefacts and some shells (Saccostrea spp. Terebralia spp. Anadara spp. And Melo spp.) but, because of the presence of coral blocks and mangrove branches, the shell scatter may be natural. It is located at 385280E 7647309N.	Fully disturb	The reliable coordinates given on the AHIS are incorrect. No cultural material is located at this location
22934	Other Heritage Place	Artefacts/Scatter, Midden/Scatter	Hadson Midden 2 – Artefacts/Scatter, Midden/Scatter	No impact	Demarcation and site avoidance



Heritage place ID	Site Status	Туре	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
38638	Other Heritage Place	Camp, Artefact Scatter, Shell Scatter & Grinding	Mardie Salt 01 is an artefact scatter and marine resource (shell lens of predominately <i>Anadara granosa</i> ) exploitation area. The site is a sparsely dispersed artefact scatter of approximately 30-50 pieces of knapped stone, several portable grindstones as well as numerous mullers and hammer stones. Mardie Salt 01 appears to be representative of what has been termed (Meehan, 1982) a 'Home Base'. That is a location where men and women (family groups) regularly get together after collection of the gathered molluscs for consumption. As well as the marine resource collection, the knapped and grinding stone(s) indicates that tool manufacture and food processing has taken place.	Fully disturb	Salvage and relocation of salvage material complete



38637	Other	Camp, Artefact	Mardie Salt 02 – The site was	Fully disturb	Salvage and relocation of
	Heritage	Scatter, Shell	recorded in July 2020 by		salvage material
	place	Midden and	anthropologist Damien Lafrentz		
		Grinding	and archaeologist Nigel Tonkin in		
			co-operation with YM Traditional		
			Owners. Mardie Salt 02 is an		
			artefact scatter and marine		
			resource (shell lens of		
			predominately Anadara granosa)		
			exploitation area. The site is a low		
			density artefact assemblage		
			consisting of dolerite, basalt and		
			BIF artefacts. Both the cultural		
			material and shell lens appeared to		
			be embedded in a paleo channel		
			that has been heavily silted and has		
			significant Mesquite infestation.		
			Mardie Salt 02 is a sparsely		
			dispersed artefacf scatter of		
			approximately 60-120 pieces of		
			knapped stone, portable		
			grindstones as well as numerous		
			mullers and hammer stones.		
			Mardie Salt 01 appears to be		
			representative of what has been		
			termed (Meehan, 1982) a 'Home		
			Base'. That is a location where		
			men and women (family groups)		
			regularly get together after		
			collection of the gathered molluscs		
			for consumption. As well as the		
			marine resource collection, the		
			knapped and grinding stone(s)		
			indicates that tool manufacture		
			and food processing has taken		
			place.		



Heritage place ID	Site Status	Туре	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
38594	Other Heritage Place	Artefacts/Scatter, Grinding Patches/Grooves, Camp	Mardie Salt 03 – The site was recorded by archaeologist Nigel Tonkin and anthropologist Damien Lafrentz in co-operation with YM Traditional Owners in July 2020 Mardie Salt 03 is an artefact scatter and grinding site. This site is a moderately sized artefact scatter of approximately 10 – 15 pieces of knapped stone artefacts. Most artefacts were made from locally sourced Chert, with lesser numbers of Ironstone and Mudstone. The site appeared to be a short-term transitional habitation site with the artefact distribution predominately in 4 small clusters with a sparse background scatter. Maximum artefact density was approximately 3m2Most notable at the site was the five grindstones and four mullers with one particular grindstone showing signs of extensive use and resurfacing (pitting)	No impact	Demarcation and site avoidance



Figure 3: Mardie Salt Project – Section 18 Status

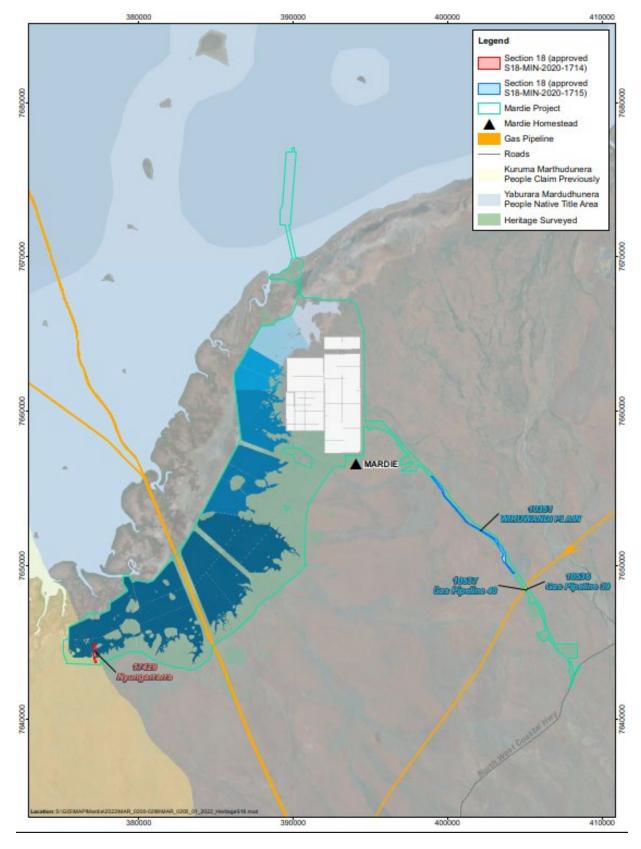
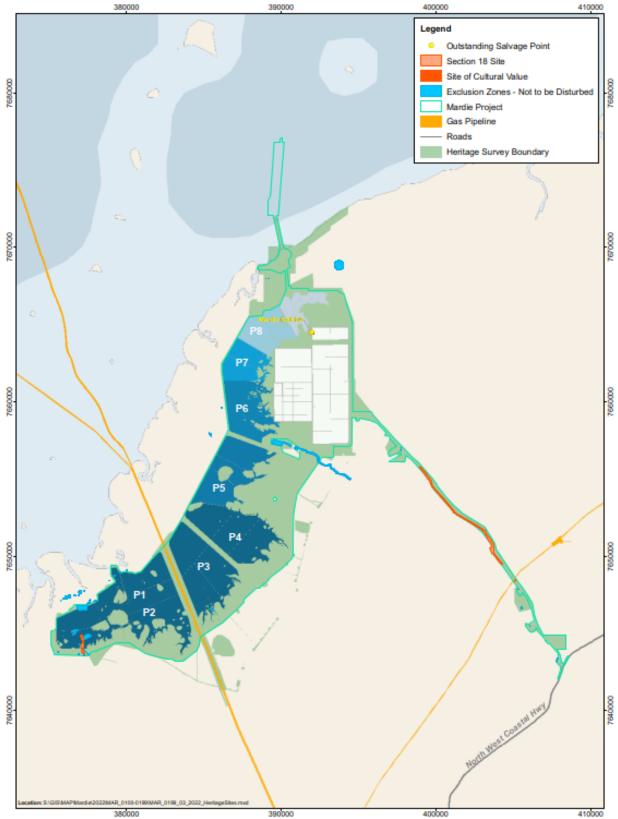




Figure 4: Mardie Salt Project – Heritage Status





## 10.3 Ground Disturbing Activities / Ground Disturbance Permit

Any party undertaking ground disturbing works must request and obtain a GDP from BCI. The Heritage Team will carry out an Aboriginal heritage impact assessment prior to determining any GDP conditions and prior to issuing the approved GDP.

The purpose of the GDP is to ensure BCI provides approval to Project Personnel to disturb land that will not breach obligations under relevant legislation, including the AHA and the other obligations discussed in this Plan.

The GDP will outline the relevant conditions and heritage procedures to be followed for each area of land subject to undertaking the ground disturbing activities.

#### 10.4 Aboriginal Monitoring of Ground Disturbing Activities

In some areas of the Project, Aboriginal monitoring may be required during initial ground disturbing activities for highly significant cultural areas or areas not able to be heritage cleared due to dense vegetation. This will be managed as part of BCI's ground disturbance process.

# 10.5 Archaeological Salvage

Archaeological salvage of heritage sites within the Project area may become an agreed mitigation strategy throughout the consultation and approval process for specific heritage places.

This will be managed as part of BCI's ground disturbance process and is subject to obtaining any required approvals. The salvaging process includes recording the cultural material in situ, removing the cultural material within the proposed impact area (pursuant to the terms of a section 18 or with the agreement and cooperation of the relevant Traditional Owner group), relocating the cultural material in accordance with the agreed salvage methodology, either to a designated keeping place or an area outside of the construction footprint and recording the location the cultural material is relocated to.

Materials salvaged to date have been placed in keeping place locations throughout the site:

- Mardie Salt 03 (Mardie Road)
- NS Road Keeping Place
- Mardie Creek Burial Site
- Island 5 (near Peters Creek)

All cultural material salvaged from the Project area will be relocated by, and in consultation with, the Traditional Owners. The status of salvaged heritage places is captured in Table 10 for YM and Table 11 for RRK with outstanding salvage in bold text. Relocation details of materials to the preferred keeping place is also documented.



Table 10: Salvage Heritage Places – YM

SALVAGE REPORT DATE	SALVAGE ID	GPS CO- ORDINATES	TYPE / COUNT	RELOCATION AREA
September 2022	Mardie Salt Salvage Pt 1	388745 7662480	Artefacts	Mardie Pool
March 2021	Mardie Salt Salvage Pt 2	394248 7658574	Artefacts	DPLH 6322 Mardie Creek Burial
March 2021	Mardie Salt Salvage Pt 3	394319 7658611	Artefacts	DPLH 6322 Mardie Creek Burial
TBD	Mardie Salt Salvage Pt 4	378248 7645915	34 artefacts	Island 5 near Peters Creek
TBD	Mardie Salt Salvage Pt 5	378405 7646501	18 artefacts	Island 5 near Peters Creek
March 2021	Mardie Salt Salvage Pt 6	385955 7655458	Artefacts	Island 5 near Peters Creek
March 2021	Mardie Salt Salvage Pt 7	394259 7657605	Artefacts	DPLH 6322 Mardie Creek Burial
TBD	Mardie Salt Salvage Pt 8	379383 7647605	7 artefacts	Island 5 near Peters Creek
TBD	Mardie Salt Salvage Pt 9	382403 7647977	7 artefacts	Island 5 near Peters Creek
March 2021	Mardie Salt Salvage Pt 10	394136 7657635	Artefacts	DPLH 6322 Mardie Creek Burial
TBD	Mardie Salt Salvage Pt 11	381560 7648981	51 artefacts	Island 5 near Peters Creek
TBD	Mardie Salt Salvage Pt 12	378859 7645848	32 artefacts	Island 5 near Peters Creek
December 2021	Mardie Salt Salvage Pt 13	378901 7646193	Artefacts	Section 18 Island 5 near Peters Creek
March 2021	Mardie Salt Salvage Pt 14	385967 7655476	Artefacts	Island 5 near Peters Creek
June 2022	Mardie Salt Salvage Pt 15	384135 7653332	Artefacts	North South Road Keeping Place
June 2022	Mardie Salt Salvage Pt 16	384009 7653221	Artefacts	North South Road Keeping Place
June 2022	Mardie Salt Salvage Pt 17	384067 7652889	Artefacts	North South Road Keeping Place
June 2022	Mardie Salt Salvage Pt 18	384832 7653192	Artefacts	North South Road Keeping Place
September 2022	Mardie Salt Salvage Pt 19	387817 7660150	Artefacts	Mardie Pool



SALVAGE REPORT DATE	SALVAGE ID	GPS CO- ORDINATES	TYPE / COUNT	RELOCATION AREA
TBD	Mardie Salt Salvage Pt 20	377784 7645306	45 artefacts	Island 5 near Peters Creek
September 2022	Mardie Salt Salvage Pt 21	387961 7660035	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 22	387913 7661469	Artefacts	Mardie Pool
TBD	Mardie Salt Salvage Pt 23	378693 7646740	14 artefacts	Island 5 near Peters Creek
TBD	Mardie Salt Salvage Pt 26 & 27	388972 7654876 389053 7654796	34 artefacts 2 balor shell fragments	DPLH 6322Mardie Creek Burial Site
September 2022	Mardie Salt Salvage Pt 28	394103 7660748	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 29	393769 7660528	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 30	393826 7660740	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 31	390491 7655334	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 32	390665 7655507	Artefacts	Mardie Pool
March 2021	Mardie Salt Salvage Pt 33	389662 7655197	Artefacts	DPLH 6322 Mardie Creek Burial Site
March 2021	Mardie Salt Salvage Pt 34	389537 7655002	Artefacts	DPLH 6322 Mardie Creek Burial Site
September 2022	Mardie Salt Salvage Pt 35	390096 7655536	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 36	390216 7655583	Artefacts	Mardie Pool
August 2021	Mardie Salt Salvage Pt 37	406245 7646648	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 38	404992 7648666	Artefacts	Mardie Salt 03
February 2021	Mardie Salt Salvage Pt 39	396734 7658144	Artefacts	DPLH 6322 Mardie Creek Burial Site (temporarily)
September 2022	Mardie Salt Salvage Pt 40	390579 7666643	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 41	391235 7665727	Artefacts	Mardie Pool
August 2021	Mardie Salt	406487 7645795	Artefacts	Mardie Salt 03



SALVAGE REPORT DATE	SALVAGE ID	GPS CO- ORDINATES	TYPE / COUNT	RELOCATION AREA
	Salvage Pt 42			
September 2022	Mardie Salt Salvage Pt 43	395017 7659864	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 44	394866 7660266	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 45	394559 7660551	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 46	394676 7660371	Artefacts	Mardie Pool
September 2022	Mardie Salt Salvage Pt 47	394617 7659933	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 48	393522 7657237	Artefacts	Mardie Pool
August 2021	Mardie Salt Salvage Pt 49	406103 7646774	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 50	405835 7646606	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 51	405528 7646800	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 52	405924 7646898	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 53	403697 7650877	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 54	402837 7652007	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 55	402446 7652291	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 56	405731 7646878	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 57	405530 7647119	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 58	405600 7647069	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 59	405569 7647132	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 60	405672 7647298	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 61	405487 7647310	Artefacts	Mardie Salt 03
August 2021	Mardie Salt Salvage Pt 62	405732 7647480	Artefacts	Mardie Salt 03
June 2022	Mardie Salt Salvage Pt 63	405600 7647069	Artefacts	North South Road Keeping Place



SALVAGE REPORT DATE	SALVAGE ID	GPS CO- ORDINATES	TYPE / COUNT	RELOCATION AREA
TBD	Mardie Salt Salvage Pt 64	394028 7662172	Artefacts	TBD
TBD	Mardie Salt Salvage Pt 65	394058 7662054	Artefacts	TBD
TBD	Mardie Salt Salvage Pt 66	394465 7661883	Artefacts	TBD
TBD	Mardie Salt Salvage Pt 67	394448 7661491	Artefacts	TBD
TBD	Mardie Salt Salvage Pt 68	394422 7661536	Artefacts	TBD
TBD	Mardie Salt Salvage Pt 69	394391 7661795	Artefacts	TBD
June 2022	Mardie Salt Salvage Pt 70	389370 7656056	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 71	389889 7656662	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 72	389782 7656643	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 73	392409 7656105	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 74	394274 7657608	Artefacts	Mardie Pool
TBD	Mardie Salt Salvage Pt 75	394397 7657333	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 76	392438 7656189	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 77	392456 7656167	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 78	392513 7656200	Artefacts	
June 2022	Mardie Salt Salvage Pt 79	392249 7656336	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 80	392354 7656153	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 81	392404 7656268	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 82	392257 7656454	Artefacts	Mardie Pool
June 2022	Mardie Salt Salvage Pt 83	392273 7656477	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 84	394079 7659895	Artefacts	



SALVAGE REPORT DATE	SALVAGE ID	GPS CO- ORDINATES	TYPE / COUNT	RELOCATION AREA
October 2021 June 2022	Mardie Salt Salvage Pt 85	394064 7659997	Artefacts	
September 2022	Mardie Salt Salvage Pt 86	393362 7660428	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 87	392805 7659973	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 88	391893 7659966	Grind Stone	Mardie Pool
September 2022	Mardie Salt Salvage Pt 89	392853 7662120	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 90	393223 7658868	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 91	393410 7658891	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 92	393324 7658689	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 93	393210 7658807	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 94	394475 7661014	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 95	394501 7661046	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 96	394543 7661094	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 97	394230 7660928	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 98	389308 7659463	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 99	389268 7659421	Artefacts	Mardie Pool
October 2021 June 2022	Mardie Salt Salvage Pt 100	389326 7659332	Artefacts	Mardie Pool
June 2022	New Port Access Road	391822 7664476	Artefacts	Mardie Pool
September 2022	Mardie Salt 01	389564 7660846	Artefacts	Mardie Pool
Pending	Mardie Salt 02	391974 7664486	Artefacts	

Table 11: Salvage Heritage Places – RRK



SALVAGE ID	GPS CO-ORDINATES	ARTEFACT COUNT	RELOCATION AREA
Getac 1 – WR:2	375989 7646283	3	Island 5
Getac 1 – WR:4	375753 7645173	1	Island 5
Getac 1 – WR:3	375695 7644474	2	Island 5
Getac 1 – WR:4	375696 7644474	7	Island 5
Getac 1 – WR:5	375696 7644474	1	Island 5
Getac 1 – WR:6	375754 7644494	2	Island 5
Getac 1 – WR:9	376970 7645117	5	Island 5
Getac 1 – WR:12	376804 7645069	2	Island 5
Getac 1 – WR:13	376804 7645069	1	Island 5
Getac 1 – WR:14	376806 7645067	3	Island 5
Getac 1 – WR:15	376801 7645069	Oyster Shell	Island 5
Getac 1 – WR:16	376739 7645061	2	Island 5
Getac 1 – WR:17	376556 7644985	1	Island 5
Getac 1 – WR:1	375999 7646214	2	Island 5
Getac 1 – WR:3	375883 7646069	8	Island 5
Getac 1 – WR:7	376013 7644605	2	Island 5
Getac 1 – WR:8	377008 7645060	5	Island 5
Getac 1 – WR:10	376928 7644975	3	Island 5
Getac 1 – WR:11	376804 7645069	2	Island 5
July 2020 Isolated Artefacts Salvage	44 locations	80 artefacts	Island 5

# **10.6** Demarcation of Heritage Sites

The outer perimeter of any heritage sites or places in the Development Envelope of the Mardie Salt Project/Project will be physically demarcated to avoid any indirect disturbance. Individual demarcation requirements for each site/place are noted in Table 12 and shown in Figure 5.

**Table 12: Demarcation Sites** 

SITE ID	GPS CO-ORDINATES	RRK/YM
Peters Creek Scatter 1	376960 7643677	RRK
Peters Creek Scatter 2	377249 7643927	RRK
Peters Creek Scatter 3	377204 7644684	RRK
BCI21-01	377463 7643693	RRK
BCI21-02	377543 7643645	RRK
BCI21-03	377244 7643626	RRK
BCI21-04	377329 7643533	RRK

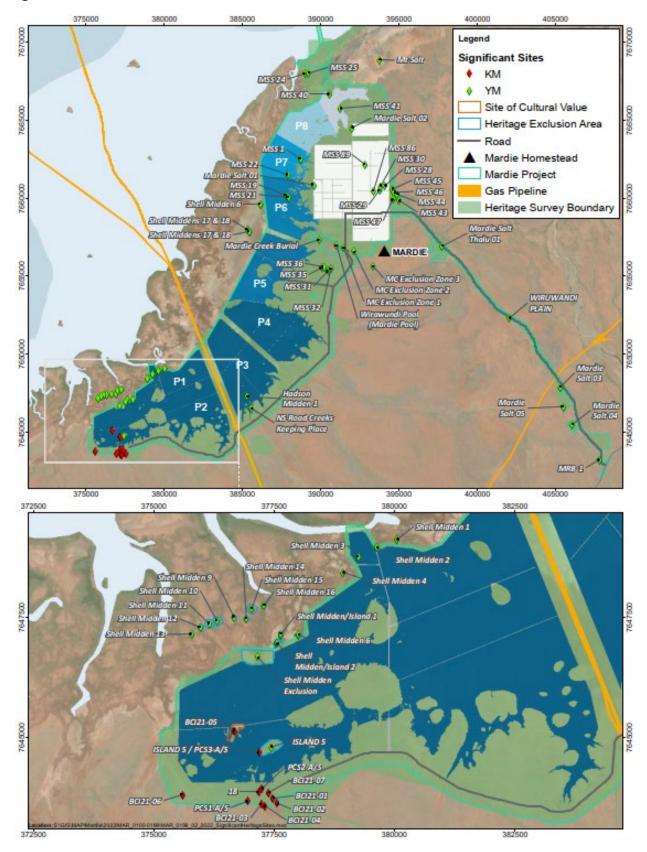


SITE ID	GPS CO-ORDINATES	RRK/YM
BCI21-05	376749 7645111	RRK
BCI21-06	375632 7643820	RRK
BCI21-07	377366 7643864	RRK
Shell Midden Island 1	377640 7647143	YM
Shell Midden Island 2	377559 7646977	YM
Shell Midden Island 5	377445 7646676	YM
Shell Midden Island 6	378023 7647142	YM
Shell Midden 1	380054 7649111	YM
Shell Midden 2	379642 7648956	YM
Shell Midden 3	379260 7648751	YM
Shell Midden 4	378929 7648435	YM
Shell Midden 6	378023 7647142	YM
Shell Midden 9	376673 7647492	YM
Shell Midden 10	376323 7647413	YM
Shell Midden 11	376163 7647358	YM
Shell Midden 12	375982 7647285	YM
Shell Midden 13	375790 7647156	YM
Shell Midden 14	376926 7647464	YM
Shell Midden 15	377039 7647670	YM
Shell Midden 16	377285 7647739	YM
Shell Midden 17	385432 7657887	YM
Shell Midden 18	385432 7657887	YM
Shell Midden Exclusion	377158 7646676	YM
NS Road Creeks Keeping Place	385561 7646551	YM
Mardie Salt 05	405542 7646658	YM
Mardie Salt Thalu 01	397758 7656913	YM
MC Exclusion Zone 1	391442 7656884	YM
MC Exclusion Zone 2	392123 7656606	YM
MC Exclusion Zone 3	393340 7655661	YM

Demarcation will be in accordance with BCI's Demarcation and Survey Procedure (WIN-0000-CI-PRO-0001).



**Figure 5: Demarcation Sites** 





# **10.7** Aboriginal Heritage Incidents

It is a breach of section 17 of the AHA (sections 92-95 of the ACHA) to disturb or damage an Aboriginal site without prior section 18 Ministerial approval (as per section 319-321 of the ACHA). No ground disturbing work in an Aboriginal heritage site should be conducted without having a GDP issued from BCI and having the appropriate heritage procedures in place.

In the event that inadvertent damage occurs to an Aboriginal heritage site within the Project area, the damaging activity will cease immediately and the following procedures will be followed:

- Work will cease, the Registered Manager will be contacted, and the area will be cordoned off with surveyor's tape.
- The Registered Manager will contact the Heritage Team to assess the situation to determine the extent of impact and noncompliance.
- The Heritage Team will contact the DPLH and the Traditional Owner group/s' Heritage Managers immediately.
- The incident will be dealt with and reported on according to BCI Incident Management System, using an Incident Notification Form.
- The Heritage Team, along with the Registered Manager, will implement any recommendations or procedures as directed by the DPLH and the Traditional Owner groups.

No work is to be conducted in the area until the investigation is closed-out, and new procedures are in place, if required.

## 10.8 Discovery of Aboriginal Sites (Excluding Human Remains)

Whilst every effort has been undertaken to identify all Aboriginal heritage sites, there may be Aboriginal heritage sites within the project that have not been located either on the surface or subsurface. If cultural material is uncovered or identified, the incident reporting procedure detailed above must be followed along with the following considerations:

- The Heritage Team will contact the Prescribed Body Corporate which will engage Aboriginal monitors or an archaeologist (in its discretion) to assess the material and, among other things, determine whether the material constitutes a site as specified under section 5 of the AHA (section 314 of the ACHA).
- The archaeologist will conduct the necessary site recording. If the material is determined to constitute a site, the Heritage Team will determine whether there is a section 18 consent in place to disturb heritage sites on that land.
- If the location of the site was subject to a section 18 approval (section 318-324 of the ACHA), then the archaeologist along with the Aboriginal monitors will salvage and relocate material in accordance with salvage methodology.
- If the land in which the site is situated is not subject to a section 18 consent (section 318-324 of the ACHA), then no work is to be conducted in the area until section 18 consent has been granted by DPLH.
- If the material is not determined to constitute a site under AHA definition, BCI and the Traditional Owner groups will cooperate to determine how to deal with the material.

#### 10.9 Discovery of Human Remains

If human remains are uncovered at any stage during the development the incident reporting procedure detailed above must be followed along with the following considerations:



- The Registered Manager will contact the WA Police.
- The Registered Manager will contact the Head of Corporate Affairs and BCIs Heritage Team who will contact the DPLH and the Traditional Owner Group/s' Heritage Manager. Aboriginal monitors and an archaeologist will be invited to site with the police for consultation purposes.
- If the remains are decided to be historical Aboriginal remains, then determination of the procedure will be directed by the DPLH and the Aboriginal stakeholders.
- If the remains are not historical Aboriginal remains, direction from WA Police will be followed.
- No personnel are allowed to disturb, touch or alter in any way the human remains unless they have been authorised by WA Police or the DPLH.

## 10.10 Monitoring, Auditing and Reporting

BCI will conduct monitoring, auditing and reporting through a number of responsive and proactive methods including:

- BCIs ground disturbance process
- Site visits and inspections
- Field and desktop audits
- Community, employee or duty-holder advice

Annual audits of the level of compliance with this Plan will be conducted. This will include recommendations for follow up actions or changes where necessary to improve auditability, accountability, compliance or address impracticalities of implementation.

The Heritage Team will be responsible for compiling the information for DPLH to satisfy the reporting conditions under each of the Section 18 approvals (sections 318-324 of the ACHA). This will be done in conjunction with the information provided by the relevant contractor undertaking ground disturbing works. Updates will be provided to the appropriate Traditional Owner groups at the same time it is provided to DPLH.

#### 11. PLAN REVIEW BY IMPLEMENTATION COMMITTEE

Review of this Plan will be undertaken after the first year and then biannually by the Implementation Committee under the terms of each LAD unless otherwise agreed with WAC and RRKAC that a review is not required at that time. Reviews of this Plan will also be undertaken where there has been update to any core legislation as identified in Section 3.3.

Any disputes regarding the management of Aboriginal heritage, or failure to comply with the Plan, will be dealt with by the relevant Implementation Committee and/or under the dispute resolution mechanisms of the LAD.

Copies of this Plan and any related procedures will be provided to the relevant Traditional Owner group in draft for their input and then in final form for signing.

Opportunities will be made available for the Implementation Committee to undertake on country assessments during regular committee meetings.



## **APPENDICES**

The following documents are available through the BCI INX/InControl system.

No.	Associated Documents	Document Number
1.	Licence to Operate Obligations Register	N/A
2.	BCI Cultural Heritage Policy	BCI-ESM-POL-002
3.	Ground Disturbance Procedure	BCI-ENV-PRO-001
4.	Demarcation and Survey Procedure	0000-CI-PRO-001
5.	Incident Reporting and Management Procedure	BCI-WHS-PRO-009
6.	Incident Notification Form	BCI-WHS-FRM-009
7.	Aboriginal Heritage Management Guidelines for Contractors	MAR-PRJ-CPR-005