

# Armidale Regional Landfill

## Aboriginal Heritage Management Plan

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### Aboriginal Heritage Management Plan

Client: Armidale Dumaresq Council

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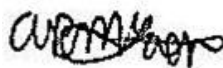

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Rev	Revision Date	Details	Authorised	
			Name/Position	Signature
0	12/12/2014	Technical Review	Dr Andrew McLaren Archaeologist	
1	29/01/2015	For Council Review	Alexandra Frolich Senior Scientist	
2	12/03/2015	Council Review	James Turnell Waste Manager	
3	3/05/2016	Final	Alexandra Frolich Senior Scientist / Project Manager	

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## 1.0 Introduction

### 1.1 Project Background

Armidale Dumaresq Council (Council) has approval for the construction and operation of a new regional landfill facility to service the Armidale region. The Armidale Regional Solid Waste (Putrescible) Landfill Facility (Armidale Landfill Facility) is located on Waterfall Way, approximately 12 km east of Armidale.

The Planning Assessment Commission, as delegate for the NSW Minister for Planning and Infrastructure, granted approval for the project under Section 75J of the *Environmental Planning and Assessment Act 1979*, subject to conditions, on 4 July 2012. The project involves construction and operation of a landfill comprising five cells, each cell with a maximum volume of 211,000m<sup>3</sup>.

Armidale Dumaresq Council (Council) engaged AECOM Australia Pty Ltd (AECOM) to prepare this Aboriginal Heritage Management Plan (AHMP) for the identified Aboriginal heritage values of the Armidale Landfill Facility, off Waterfall Way in Armidale, NSW.

The consideration of Aboriginal heritage values, potential impacts and management protocols and procedures were identified in Section 9.3 of the *Environmental Assessment* (AECOM Australia Pty Ltd, 2010). Council has committed to developing an Aboriginal Heritage Management Plan (AHMP) as outlined in *Items 20 and 21* of the EA Statement of Commitments (SoC), and which formed part of the Project Approval (06\_0220).

### 1.2 Purpose and Scope

This AHMP sets out the procedures for the care and management of Aboriginal sites within the Armidale Landfill Facility. This AHMP has been prepared to satisfy the management recommendations outlined within the *Environmental Assessment* and includes the following:

- Ensures all Armidale Landfill Facility personnel and on-site workers are aware of their obligations, responsibilities and the procedures under the *National Parks and Wildlife Act 1974* (NPW Act) (Section 4.1);
- Establishes a consultation protocol with representatives of the local Aboriginal community (Section 3.1); and
- Provides of a concise set of procedures to enable the conservation of Aboriginal cultural heritage sites artefacts within the proposed Armidale Landfill Facility, including:
  - Fencing of previously-recorded Aboriginal sites (Section 5.2);
  - Provision of Aboriginal heritage inductions & cultural awareness training to Armidale Landfill Facility personnel and on-site workers (Section 5.4); and
  - Management of previously-unrecorded Aboriginal sites, including stop work protocols (Section 5.5).

The EA Statement of Commitments relevant to Aboriginal heritage is provided in Table 1.

**Table 1 Summary of Management Recommendations, Statement of Commitments and Conditions of Approval**

Reference	Recommendation/Commitment/Condition	AHMP Section
<b>EA Statement of Commitments</b>		
SOC No.20	The Proponent (Armidale Dumaresq Council) will prepare and implement an Indigenous Heritage Management Plan	This Document
SOC No.21	The Proponent (Armidale Dumaresq Council) will fence off and avoid significant Aboriginal heritage sites.	5.2

### **1.3 Land to which this AHMP applies**

This AHMP addresses the management of all Aboriginal objects within the Armidale Landfill Facility, the boundaries of which are shown on Figure 1.



Figure 1 Project Area

**AECOM**

PROJECT AREA  
Armidale Regional Landfill  
Aboriginal Heritage Management Plan

**FIGURE 1**

## 1.4 Known Aboriginal Heritage Values

In 2006, Archaeological Surveys & Reports Pty Ltd (ASR; 2006) undertook an archaeological assessment for the Armidale Landfill Facility, which included consultation with the local Aboriginal community. Two sites (GL ISO1 and GL IOS2) were identified by ASR, both of which fell within the initial proposed landfill boundary. Details of these sites are summarised in Table 2 below:

**Table 2 Existing Sites identified within or in proximity to the Armidale Landfill Facility boundaries**

AHIMS ID#	Site Name	Description	Coordinates (AMG, Zone 56)	
			Eastings	Northings
21-4-0095	GL ISO2	Open artefact site - Isolated silcrete flake measuring 31 x 46 x 15 mm.	383235	6618414
21-4-0096	GL ISO1	Open artefact site - Isolated silcrete flake measuring 62 x 52 x 24 mm.	383143	6619426

Since the archaeological assessment (ASR, 2006), the footprint of both the proposed landfill and its access road have been re-designed to accommodate the location of the two open artefact sites. The revised boundary resulted in GL ISO1 lying within a proposed vegetated conservation corridor. No further management for GL ISO1 is required. The management procedures for GL ISO2 and other Aboriginal heritage values are described in Section 5.0 still apply.

## 1.5 Site Context

The Armidale Landfill Facility is located on Waterfall Way (also known as Grafton Road) about 12 kilometres east of the Central Business District (CBD) of the City of Armidale. The area was selected to minimise potentially adverse land use, environmental, social and economic impacts.

The regional topography is generally undulating. The northern and southern portions of the proposed Armidale Landfill Facility site gradually slope towards a low-lying area in the centre of the property. The lower area is associated with an intermittent unnamed creek that flows east towards the Gara River.

A large proportion of the Armidale Landfill Facility site has historically been cleared for agricultural purposes. A partially protected remnant of native vegetation located at the northern extent of the Armidale Landfill Facility site forms part of the Gara Travelling Stock Route (TSR).



## 2.0 Relevant Legislation

### 2.1 Environmental Planning & Assessment Act 1979

The protection of Aboriginal cultural heritage in New South Wales is principally governed by the NPW Act, which is administered by the Office of Environment and Heritage (OEH). Major developments are principally governed by the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The EP&A Act requires that consideration be given to environmental impacts as part of the land use planning process. In NSW, environmental impacts are interpreted as including cultural heritage impact. In October 2011, the *Environmental Planning and Assessment Amendment (Part 3A Repeal) Act 2011* repealed the Part 3A provisions, establishing transitional arrangements for all Part 3A projects started under the previous legislative regime. The proposed Armidale Landfill Facility is defined as a “resource recovery or waste facility” within Schedule 1 of *State Environmental Planning Policy (Major Development) 2005* (SEPP 2005). As such, the proposed landfill facility was declared by the Minister for Planning as a ‘Major Project’ (02/09/2009) subject to the provisions of Part 3A of the EP&A Act.

Part 3A of the EP&A Act provided an approvals regime that prior to its repeal applied to all major projects. Part 3A of the EP&A Act requires consultation with the community and relevant State Government agencies. However, the requirement for certain other permits and licences (e.g. Aboriginal Heritage Impact Permits) is removed under Part 3A (now Section 89J(1)(d)).

No conditions pertaining to Aboriginal heritage were identified in the Part 3A Project Approval granted for the proposed Armidale Landfill Facility (OEH ref: ER20333).

### 2.2 National Parks & Wildlife Act 1974

Pursuant to Section 89J of the EP&A Act, Aboriginal Heritage Impact Permits (AHIPs) are not required for projects approved under Part 3A of the EP&A Act (now Part 4.1). Impacts to Aboriginal heritage values associated with approved Part 3A projects are typically managed under Aboriginal Cultural Heritage Management Plans (ACHMPs). ACHMPs are statutorily binding once approved by the Planning Assessment Commission (PAC) or DP&E under delegation from the Director-General.

The *National Parks and Wildlife Act 1974* (NPW Act), administered by the OEH, is the primary legislation for the protection of Aboriginal cultural heritage in NSW. The NPW Act gives the Director-General of OEH responsibility for the proper care, preservation and protection of ‘Aboriginal objects’ and ‘Aboriginal places’, defined under the Act as follows:

- An *Aboriginal object* is any deposit, object or material evidence (that is not a handicraft made for sale) relating to Aboriginal habitation of NSW, before or during the occupation of that area by persons of non-Aboriginal extraction (and includes Aboriginal remains); and
- An *Aboriginal place* is a place declared so by the Minister administering the NPW Act because the place is or was of special significance to Aboriginal culture. It may or may not contain Aboriginal objects.

Part 6 of the NPW Act provides specific protection for Aboriginal objects and places by making it an offence to harm them. S89A of the NPW Act requires notification of the location of sites of Aboriginal objects within a reasonable time, with penalties for non-notification, including daily penalties. S89A of the NPW Act is binding in all instances including Part 3A projects.

## 3.0 Aboriginal Community Consultation

### 3.1 Consultation Protocols

#### 3.1.1 Principals of Aboriginal Stakeholder Engagement

Council recognises the importance of cultural protocols in the engagement of Aboriginal stakeholders and the Aboriginal community more broadly. As such, Council has adopted the principals outlined in the Australian Heritage Commission's guidelines *Ask First: A guide to respecting Indigenous heritage places and values* (Australian Heritage Commission, 2002). These principles require that all parties concerned with identifying, conserving, and managing Aboriginal heritage should acknowledge, accept and act on the principles that Aboriginal people:

- are the primary source of information on the value of their heritage and how this is best conserved;
- must have an active role in any Aboriginal heritage planning process;
- must have input into primary decision-making in relation to Aboriginal heritage so they can continue to fulfil their obligations towards this heritage; and
- have a right to retain control of their cultural knowledge, including intellectual property and other information relating specifically to their heritage.

### 3.2 Aboriginal Stakeholders

The Armidale Local Aboriginal Land Council (LALC) and Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants have been notified regarding this AHMP. Additional interested groups may be notified at Council's discretion.

### 3.3 Consultation for Aboriginal Heritage Assessment

At the time of the ASR's 2006 investigation, the office of the Armidale LALC was closed and contact with the group was not possible. ASR consulted the Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants (formerly the Anaiwan Aboriginal Traditional Owners) who assisted in the 2006 archaeological investigation. A representative from the Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants (Mrs Rhonda Kitchener) was present during the on-site works and identified both GL ISO1 and GL ISO2.

### 3.4 Consultation for this AHMP

#### 3.4.1 Draft AHMP

The initial draft of this AHMP was prepared based on the recommendations and findings of the Environmental Assessment (AECOM Australia Pty Ltd, 2010) and associated Aboriginal Heritage Assessment (Archaeological Surveys & Reports Pty Ltd, 2006). A copy of this draft AHMP was forwarded to the Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants and Armidale LALC for consideration, comment and endorsement. Comments to the draft AHMP received by Mrs Rhonda Kitchener from Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants were considered by Council and integrated into the final copy of this AHMP. Correspondence with the Aboriginal stakeholders has been attached as **Appendix A**.

### 3.5 Ongoing RAP Consultation

#### 3.5.1 Information/Meeting Requests

Council is committed to addressing the concerns of all Aboriginal stakeholders throughout the construction and operational phases of the Project. Should Aboriginal stakeholders wish to discuss any aspect of this AHMP, Council will facilitate this through confidential meetings. Meetings with Council can be arranged upon Aboriginal stakeholder request.



## 4.0 Management Plan Implementation and Operation

### 4.1 Roles and Responsibilities

During construction and operation of the proposed Armidale Landfill Facility, an Environmental Officer will be identified who would have responsibility for implementing and monitoring the provisions of this AHMP in liaison with the Armidale Landfill Facility Waste Manager. The Environmental Officer, or equivalent, will be suitably qualified and experienced in order to oversee the environmental performance of the landfill facility and compliance with statutory and other obligations including the conditions of approvals and licences.

The roles and responsibilities subject of this AHMP are outlined below in Table 3.

**Table 3 Roles and Responsibilities**

Role	Responsibility
Waste Manager	<ul style="list-style-type: none"> <li>Provide the resources necessary to implement this AHMP</li> </ul>
Environmental Officer / Super Intendant	<ul style="list-style-type: none"> <li>Implementing this AHMP on a day to day basis in consultation with on-site workers and where applicable, Aboriginal stakeholder representatives</li> <li>Provision of cultural awareness training to on-site workers, included within site-specific safety inductions</li> </ul>
Archaeologist(s)	<ul style="list-style-type: none"> <li>Provide expertise in the management of the archaeological values of Aboriginal cultural heritage objects and/or places</li> </ul>
Aboriginal Stakeholders	<ul style="list-style-type: none"> <li>Provide expertise in the management of Aboriginal cultural heritage objects and/or places</li> </ul>
On-site workers / Contractors	<ul style="list-style-type: none"> <li>Awareness, understanding and appreciation of on-site Aboriginal heritage values.</li> <li>Consideration of Aboriginal heritage values in development of task-specific environmental and safe work method statements</li> </ul>

### 4.2 AHMP Review

This AHMP will be reviewed following completion of the development of the proposed Armidale Landfill Facility. The AHMP will then be reviewed at least every five years and following any significant changes (i.e. changes to consent/licence requirements or monitoring protocol). Each review will be undertaken in consultation with relevant stakeholders and made available on the Council website.

## 5.0 Management Procedures

### 5.1 Summary of Management Actions

Management of existing and previously unidentified Aboriginal sites has been categorised into the following:

- Management;
- Monitoring; and
- Incidence Response.

The following management measures have been developed to ensure the protection of Aboriginal heritage values within the proposed Armidale Landfill Facility.

### 5.2 Fencing and Signage

In consultation with Aboriginal stakeholders, the previously identified site within the Armidale Landfill Facility (GL ISO2) is to be fenced and appropriately signed to mitigate potential impact risks associated with the development. A proposed conservation corridor to be established along the western boundary will not fall within the fenced area. Metal signage will be affixed to the fencing panels (or posts) at GL ISO2 and will include the following words as a minimum:

**ENVIRONMENTALLY SENSITIVE AREA**  
**EXCLUSION ZONE**  
**CONTACT WASTE MANAGER**  
**(Contact details)**

Fencing will be undertaken immediately following approval of this AHMP. An archaeologist, Council representative and Aboriginal stakeholder representative with relevant familiarity with GL ISO2 will determine the archaeological site extents for fencing. Fencing will encompass the boundary of GL ISO2 and incorporate a minimum 5 m buffer to consider subsurface potential and avoid impact the site from the construction of the fence. At a minimum, the fence should comprise a series of vertical posts, chainlink, or other suitable barrier to ensure protection of GL ISO2.

Fencing will be inspected annually to ensure the integrity of the fencing is not compromised and that no adverse impacts have occurred within the fenced area. The Armidale Landfill Facility Environmental Officer (or delegate) will be responsible for organising fencing inspections.

### 5.3 Monitoring During Topsoil Stripping

Archaeological Surveys & Reports Pty Ltd (2006:36) identified potentially archaeologically sensitive areas on the northern and southern banks of the unnamed watercourse where intersected by the proposed access road corridor (Figure 1). To mitigate potential impact to previously-unidentified archaeological deposits within this footprint, Aboriginal stakeholder representatives will be invited to monitor topsoil stripping (assumed 20 cm depth maximum) on the northern and southern banks, approximately 20 m on either side of the unnamed watercourse. Aboriginal stakeholder representatives will be afforded opportunity to inspect excavated topsoil for potential cultural materials. If any Aboriginal cultural materials are identified during the topsoil stripping, they would be collected and interred to the Aboriginal Cultural Centre & Keeping Place located on Kentucky St, Armidale.

### 5.4 Aboriginal Heritage Induction & Cultural Awareness Training

All on-site workers (including Armidale Landfill Facility personnel and subcontractors) will be required to undertake site induction training prior to commencing works at Armidale Landfill Facility. The induction should include applicable environmental standards, procedures and processes and outline current protocols and responsibilities with respect to the management of Aboriginal cultural heritage on land within the Armidale Landfill Facility. It will also provide an overview of the site types present and procedures for reporting the identification of Aboriginal archaeological sites.

## 5.5 Management of Previous Unrecorded Aboriginal Sites

The *NPW Act* requires that, if a person finds an Aboriginal object on land and the object is not already recorded with AHIMS, they are legally bound under Section 89A of the *NPW Act* to notify OEH of the object's location as soon as possible.

### 5.5.1 Previously Unidentified Aboriginal Objects

If an Aboriginal object(s) is identified at any time, all works in the vicinity should cease immediately to prevent any further impacts and a qualified archaeologist be engaged to make an assessment of the object(s). Management options for any newly identified objects would be dependent on the nature and significance of these objects, as determined by the archaeologist. As indicated in Section 4.2, it is a requirement that this AHMP be updated to include all newly identified objects.

### 5.5.2 Human Skeletal Remains

The following outlines the procedure that should be followed in the case that potential human remains are discovered at any time at the Armidale Landfill Facility. The procedure considers the following documents:

- Manual for the Identification of Aboriginal Remains (NSW Department of Environment & Conservation 2006);
- Skeletal Remains - Guidelines for the management of human skeletal remains under the Heritage Act 1977 (NSW Heritage Office 1998); and
- The Aboriginal Cultural Heritage Standards and Guidelines Kit (NSW NPWS 1997).
  - When suspected human remains are exposed, all work is to cease immediately in the near vicinity of the unexpected find location and the site manager is to be immediately notified to allow assessment and management;
  - An area of 10 m radius is to be cordoned off by temporary fencing around the exposed remains. Works may continue outside of this area on the condition that no risk of interference to the remains or the assessment of the remains;
  - The Environmental Officer is to notify:
    - § Council;
    - § NSW Police; and
    - § OEH.
- A physical or forensic anthropologist will be commissioned by the Police to inspect the remains in situ (organised by the Police unless otherwise directed), and make a determination of the ancestry of the remains (Aboriginal or non-Aboriginal) and antiquity (pre-contact, historic or modern). If the remains are identified as:
  - Modern: the area is deemed as crime scene; or
  - Aboriginal: the area is to be secured and OEH and all Aboriginal stakeholders are to be notified in writing; or
  - Non-Aboriginal (historical): the site is to be secured and the Heritage Branch is to be contacted.
- The above process functions only to appropriately identify the remains and secure the area. From this time, the management of the area and remains is to be determined through one of the following means:
  - a. If the remains are identified as a modern matter liaise with the Police;
  - b. If the remains are identified as Aboriginal liaise with the proponent, OEH and Aboriginal stakeholders;



- c. If the remains are identified as non-Aboriginal (historical) liaise with Council, the Department of Planning and Environment (formally Department of Planning and Infrastructure) and the Heritage Office; and
- d. If the remains are identified as not being human then work can recommence without delay.

## 6.0 References

AECOM Australia Pty Ltd. (2010). *Environmental Assessment, Armidale Regional Landfill*.

Archaeological Surveys & Reports Pty Ltd. (2006). *The Archaeological Investigation For Sites Of Indigenous Cultural Significance on the Site of the Proposed New England Regional Landfill Waterfall Way, East Of Armidale, Northern Tablelands, NSW*.

Australian Heritage Commission. (2002). *Ask First: a guide to respecting Indigenous heritage places and values*. Canberra: Australian Government Publishing Service. Retrieved from <http://www.environment.gov.au/heritage/ahc/publications/commission/books/pubs/ask-first.pdf>

NSW Department of Environment & Conservation. (2006). *Manual for the Identification of Aboriginal Remains*. South Sydney: NSW Department of Environment and Conservation.

NSW Heritage Office. (1998). *Skeletal Remains: Guidelines for the management of human skeletal remains under the Heritage Act 1977*. Parramatta: NSW Heritage Office.

NSW National Parks and Wildlife Service. (1997). *Aboriginal Cultural Heritage Standards and Guidelines Kit (First)*. Sydney: NSW National Parks and Wildlife Service.



# Appendix A

## Aboriginal Stakeholder Consultation

## Introduction

Aboriginal stakeholder consultation acknowledges the right of Aboriginal people to be involved, through direct participation, on matters that affect their heritage. Involving Aboriginal stakeholders ensures that they are provided adequate opportunity to share information about cultural values and to actively participate in the development of appropriate management options. The successful identification, assessment and management of Aboriginal cultural heritage values are dependent on an inclusive and transparent consultation process. The following section has been collated by AECOM and outlines the key stages of the consultation process for the development of the AHMP.

## Consultation

### Correspondence

Aboriginal stakeholder groups were identified with reference to the Australian Heritage Commission (2002) *Ask First: a guide to respecting Indigenous heritage and values* (Australian Heritage Commission, 2002) which was used to provide 'best practice' frameworks for Indigenous community consultation and heritage assessment in NSW and to guide the Aboriginal consultation component of AECOM's assessment.

The following Indigenous groups were contacted directed via email on 15 May 2015 and provided with a digital copy of the draft AHMP for review and comment:

- The Armidale Local Aboriginal Land Council (LALC); and
- Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants

No further communication was received at this time. Follow up telephone calls to Aboriginal stakeholders were attempted on the 25 May 2015. A phone call was received from Mrs Rhonda Kitchener on the 18 June with verbal comments on the draft AHMP).

### Response to Draft AHMP

All Aboriginal stakeholders were provided with a digital copy of the draft AHMP for review and comment on 15 May 2015. A verbal response received from Mrs Kitchener on 18 June 2015 indicated that she seemed overall happy with the AHMP but was concerned about the protection of potential subsurface deposits during construction works. She reiterated her response to John Appleton from 2009, requesting that a provision for monitoring during topsoil removal be considered in the AHMP. Additionally, she suggested that the artefact in question (GL ISO2) be collected and interred to a Keeping Place or similar. It was suggested to Mrs Kitchener that the fencing was providing protection to potential subsurface deposits at that location (based on interpretation of Appleton's suggestion that GL ISO 2 contained Potential Archaeological Deposit (PAD) (Archaeological Surveys and Reports, 2009:38).

No correspondence was received from Armidale LALC.