



# PLAN OF MANAGEMENT

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## KOOMARINGA ABORIGINAL PLACE

RANKINS SPRINGS, NSW

JUNE 2024



### **Acknowledgement**

The Koomaringa Aboriginal Place is in the traditional lands of the Wiradjuri people. The Wiradjuri beliefs, cultural heritage, and continuing connection with the land is acknowledged. Wiradjuri Elders, past and present, are recognised as role models and as the repository for the memories, traditions, and culture of the Wiradjuri community.



View of the Koomaringa Aboriginal Place in October 2019.

## CONTENTS

<b>ABBREVIATIONS AND GLOSSARY .....</b>	<b>VI</b>
<b>1 INTRODUCTION .....</b>	<b>1</b>
1.1 Purpose, aims and outcomes of the Plan .....	1
1.2 The process for preparing and endorsing a Plan .....	2
1.3 About the Koomaringa AP .....	2
1.3.1 Wiradjuri country .....	5
1.3.2 Landscape context .....	5
1.3.3 Local development.....	6
1.3.4 Tenure and boundaries .....	7
1.3.5 Historical management arrangements within the Aboriginal Place.....	9
1.4 Cultural heritage values.....	12
1.4.1 Cultural values .....	12
1.4.2 Scientific values .....	13
1.4.3 Aesthetic values.....	16
1.4.4 Historic heritage values.....	16
1.4.5 Statement of significance .....	17
1.5 Relevant legislation and policy .....	22
1.5.1 Heritage NSW – Aboriginal heritage management.....	22
1.5.2 Local government planning and land use.....	23
<b>2 MANAGEMENT PLAN STAKEHOLDERS .....</b>	<b>24</b>
2.1 Wiradjuri stakeholders.....	24
2.2 Other parties.....	24
<b>3 MANAGEMENT PROTOCOLS .....</b>	<b>25</b>
3.1 Management aims.....	25
3.1.1 Wiradjuri stakeholder management aims .....	25
3.1.2 Stakeholder management aims .....	32
3.2 Statements of management.....	33
3.3 Koomaringa Management Group .....	34
3.4 Management measures.....	35

3.5	Future proposed works .....	36
3.6	Heritage inductions.....	37
3.7	Land management risk assessment.....	37
3.8	Cultural activity risk assessment.....	39
3.9	Cultural value management statement.....	39
<b>4</b>	<b>HERITAGE MANAGEMENT MEASURES .....</b>	<b>42</b>
4.1	Matters for negotiation.....	42
4.2	Treatment of culturally sensitive information.....	42
4.3	Management priorities .....	42
4.4	Heritage management zones.....	44
4.5	Activities that may harm the Koomaringa AP.....	46
4.5.1	Exemptions to harm .....	46
4.6	Managing harm to known Aboriginal objects.....	47
4.6.1	ACHA assessment.....	47
4.6.2	Archaeological salvage.....	47
4.6.3	Archaeological testing.....	48
4.6.4	Monitoring of sites within the Koomaringa AP.....	48
4.7	Managing harm to significant historic heritage.....	49
4.8	Managing harm to unknown heritage.....	49
4.8.1	Potential skeletal remains.....	49
4.8.2	Newly identified heritage items.....	50
4.9	Specific management measures to mitigate risk to known heritage sites.....	50
4.9.1	Site demarcation and signage.....	51
4.9.2	Visitor facilities.....	51
4.9.3	Erosion control .....	52
4.9.4	Blasting impacts.....	52
4.9.5	Visual amenity.....	53
4.9.6	Public / Aboriginal community access .....	53
4.9.7	Infrastructure.....	54
4.9.8	Fire management.....	54



4.9.9	Interpretation strategy.....	55
<b>5</b>	<b>CONTACTS .....</b>	<b>56</b>
	<b>REFERENCES .....</b>	<b>57</b>
	<b>APPENDIX 1: WRQ DEVELOPMENT APPROVAL.....</b>	<b>59</b>
	<b>APPENDIX 2: KOOMARINGA ABORIGINAL PLACE GAZETTE NOTICE.....</b>	<b>60</b>
	<b>APPENDIX 3: WIRADJURI STAKEHOLDERS' RESPONSES TO THE DRAFT PLAN .....</b>	<b>61</b>
	<b>APPENDIX 4: OZARK DOCUMENT CONTROL .....</b>	<b>93</b>

## FIGURES

Figure 1-1: Location of the Koomaringa AP.....	4
Figure 1-2: Location of the WRQ within the Koomaringa AP. ....	8
Figure 1-3: Location of the fenced extents of heritage sites.....	18
Figure 1-4: Location of known Aboriginal sites within the Koomaringa AP.....	19
Figure 1-5: Images of Site A, Site B, and Site C.....	20
Figure 1-6: Selection of sites and artefacts recorded at the Koomaringa AP. ....	21
Figure 4-1: Heritage management zones within the Koomaringa AP.....	45

## TABLES

Table 1-1: Steps to completing a management plan (OEH 2017:4–5).....	2
Table 1-2: Sites recorded at the Koomaringa AP. ....	15
Table 3-1: Summary of Wiradjuri stakeholder management aims.....	28
Table 3-2: Management requirements for activities in the Koomaringa AP and outside the WRQ. .....	38
Table 3-3: List of cultural activities with a management requirement.....	39
Table 3-4: Specific value statements for the Koomaringa AP.....	40

## ABBREVIATIONS AND GLOSSARY

ACHA	Aboriginal Cultural Heritage Assessment
ACHAR	Aboriginal Cultural Heritage Assessment Report. As set out in the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales</i> , all developments where harm to Aboriginal objects is likely must be assessed in an ACHAR.
ACHCRs	<i>Aboriginal Cultural Heritage Consultation Requirements for Proponents</i> . Guidelines for conducting Aboriginal community consultation for developments where harm to Aboriginal objects is likely.
AHIMS	Aboriginal Heritage Information Management System. Administered by Heritage NSW, AHIMS is the central register of all Aboriginal sites within NSW.
AHIP	Aboriginal Heritage Impact Permit
ASIRF	Aboriginal Site Impact Recording Form
Code of Practice	<i>Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales</i> under Part 6 NPW Act. Issued by DECCW in 2010, the Code of Practice is a set of guidelines that allows limited test excavation without the need to apply for an AHIP.
Debitage	The term debitage refers to all the waste material produced during lithic reduction and the production of stone tools.
DCCEEW	NSW Department of Climate Change, Energy, the Environment and Water. DCCEEW contains the environment group and HNSW
DECCW	Former Department of Environment, Climate Change and Water. The heritage functions of DECCW are now handled by HNSW
DPE	Former NSW Department of Planning and Environment. In 2024 DPE was split into DCCEEW and DPHI
DPHI	NSW Department of Planning, Housing and Infrastructure. DPHI contains the planning group
ha	hectares



Heritage Act	NSW <i>Heritage Act 1977</i> establishes protection for items or places of state or local heritage value
HNSW	Heritage NSW
km	kilometres
Koomaringa AP	Koomaringa Aboriginal Place
LALC	Local Aboriginal Land Council
LEP	Local Environmental Plan
m <sup>3</sup>	metres cubed
NPW Act	<i>National Parks and Wildlife Act 1974</i> . Primary legislation governing Aboriginal cultural heritage within NSW.
NPWS	National Parks and Wildlife Service
NSW	New South Wales
OEH	Office of the Environment and Heritage (now HNSW).
OzArk	OzArk Environment & Heritage
PAD	Potential archaeological deposit. Indicates that a particular location has potential to contain subsurface archaeological deposits, even in circumstances where Aboriginal objects are not visible on the surface.
RAPs	Registered Aboriginal Parties. In this Plan, RAPs are also referred to as Wiradjuri stakeholders.
SHI	State Heritage Inventory
SMI	Statement of Management Intent
The Guide	<i>Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales</i>
The Plan	Koomaringa Aboriginal Place Plan of Management written following the 2017 OEH Guidelines
WRQ	Western Riverina Quarry. The blue stone quarry inside the boundary of Koomaringa Aboriginal Place which is owned and operated by E.B. Mawson & Sons Pty Ltd.

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# 1 INTRODUCTION

The Koomaringa Aboriginal Place (Koomaringa AP) is in Wiradjuri country. This Plan of Management (the Plan) for the Koomaringa AP sets out how the Aboriginal Place will be managed over the coming years to protect and respect its value and significance to the Wiradjuri people and the broader community.

The *National Parks and Wildlife Act 1974* (NPW Act) requires that the values of a declared Aboriginal Place are protected.

This Plan has been prepared in accordance with the *Guidelines for Developing Management Plans for Declared Aboriginal Places* (OEH 2017). No previous Plan has been prepared for the Koomaringa AP, although a draft Statement of Management Intent (SMI; OEH 2019) has been previously prepared.

## 1.1 PURPOSE, AIMS AND OUTCOMES OF THE PLAN

The declaration of an Aboriginal Place is way of recognising and legally protecting Aboriginal cultural heritage.

The purpose of this Plan includes:

- Ensuring Aboriginal cultural values are recognised in regulatory and planning processes
- Clarifying management roles and better allocation of resources, leading to more effective management and conservation outcomes
- More effective risk management through considering hazards in advance
- Opportunities for the community to engage in conservation, and site protection and management, including through intergenerational transfer of cultural and economic opportunities where appropriate.

The overall aims of the Plan include:

- Promoting long-term protection of the cultural values at the Koomaringa AP
- Enabling Aboriginal communities to manage the cultural values of areas that hold special significance for them
- Enabling Aboriginal communities to discuss issues and reach agreements with land holders about site protection
- Improving regulatory and management outcomes for communities (OEH 2017).

The outcomes of the Plan will be wide and varied. This Plan will provide guidelines and recommendations for managing the Koomaringa AP, and any potential hazards or impacts to it. This includes, but is not limited to, ongoing access for Aboriginal community, protection of

recorded Aboriginal objects and sites and protection of the overall cultural landscape. This Plan will also outline the processes to be undertaken prior to certain types of impacts.

## 1.2 THE PROCESS FOR PREPARING AND ENDORSING A PLAN

The *Guidelines for Developing Management Plans for Declared Aboriginal Places* (OEH 2017) outlines the process for preparing and endorsing a management plan. This document lists twelve steps in completing a management plan. These steps are detailed in **Table 1-1**, with reference to the relevant section of this Plan where each one is addressed in detail.

**Table 1-1: Steps to completing a management plan (OEH 2017:4–5).**

Steps to completing a management plan	Plan section that item is addressed
Define and meet with the relevant stakeholders and affected parties	<b>Section 2.1</b>
Prepare a general statement of management	<b>Section 3.2</b>
Prepare a statement of cultural/natural values of the Aboriginal place	<b>Section 1.4</b>
Identify the Aboriginal community's management goals	<b>Section 3.1.1</b>
Identify the types of activities that may harm the Aboriginal Place and the associated cultural values	<b>Section 3.7</b>
Identify what values, objects and areas must be conserved	<b>Section 1.4</b>
Identify what works and ongoing management activities are required and timeframes for implementation	<b>Section 3.5, Section 4.3</b>
Identify how site condition reporting will be managed	<b>Section 4.6</b>
Identify other matters that may need to be negotiated between all identified groups	<b>Section 4.1</b>
Define ways in which culturally sensitive information will be treated	<b>Section 4.2</b>
List and prioritise the works required. Where tied funding is available for conservation projects, note how the funds will be used to meet the aims set out in the general statement of management	<b>Section 4.9</b>
List contacts	<b>Section 5</b>

## 1.3 ABOUT THE KOOMARINGA AP

The Koomaringa AP is located approximately 55.5 kilometres (km) north of Griffith and 17 km northwest of Rankins Springs, New South Wales (NSW). The Koomaringa AP covers approximately 420 hectares (ha) within Lot 12 DP1286927 and is surrounded by the Lachlan Range State Forest to the south and east, Wiltshire Road to the west, and grazing and cropping land surrounding the Koomaringa Homestead to the north. **Figure 1-1** shows the location of the Koomaringa AP.

The State Heritage Inventory (SHI) database states that:

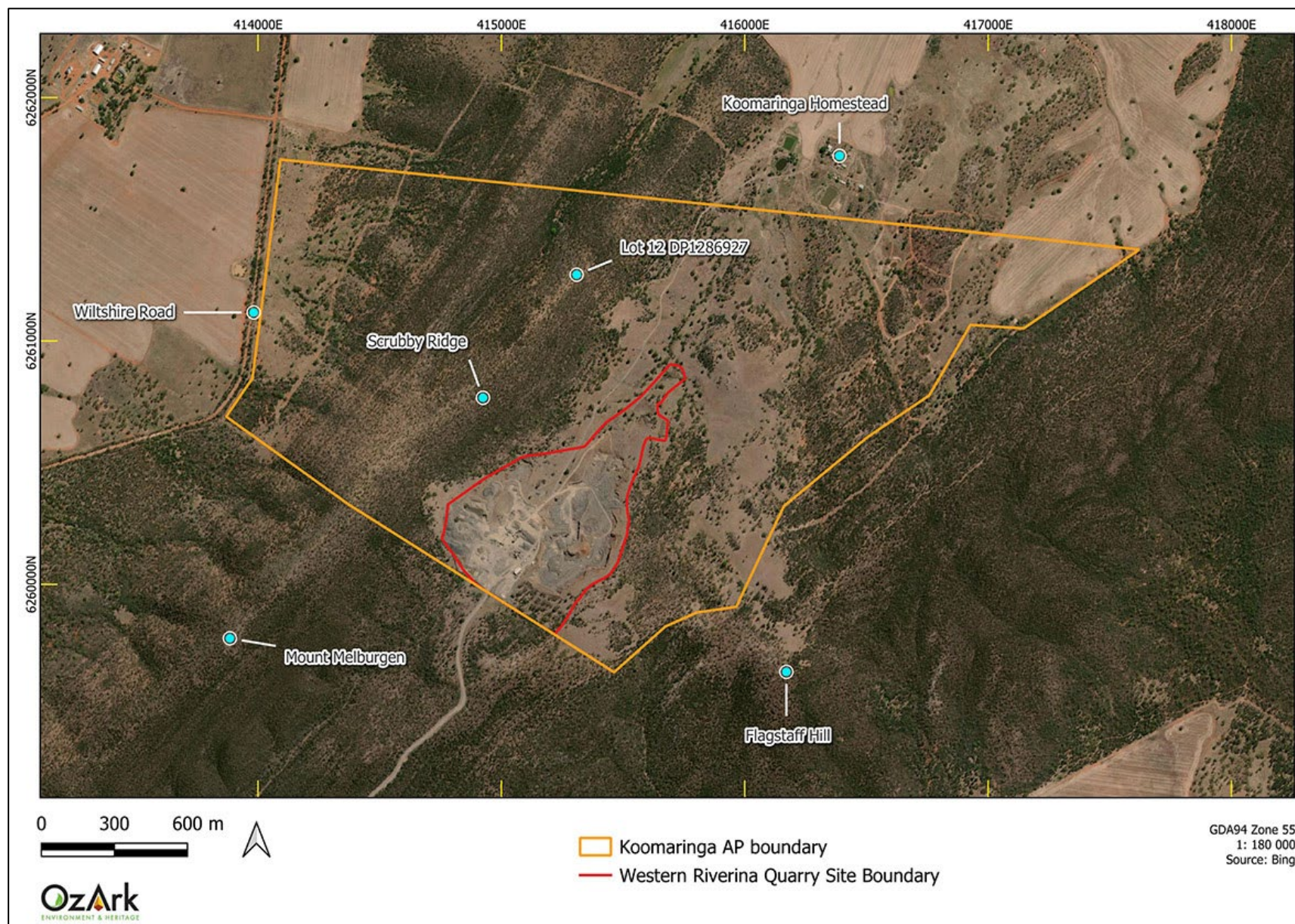
*'Koomaringa AP contains a stone quarry utilised in pre-contact times. Aboriginal people quarried felsite (a volcanic lava) by dropping or throwing blocks of stone against boulder surfaces until large rock pieces became detached. The detached rocks would then be further broken down to create 'blanks' (partly-shaped implements) from which completed tools could be manufactured. A large amount of waste material was produced in the production of the blanks and finished tools.'*



*The Koomaringa quarry is unique in the area, and the remains of felsite tools and flakes quarried and made here can be found throughout the region. As well as providing material evidence of the various steps involved in tool-making, quarries are important because they can provide information about Aboriginal trade routes.'*  
(OEH 2015)

The Koomaringa AP was gazetted under Section 84 of the NPW Act by the Minister for the Environment in 1991 (**Appendix 2**).

Figure 1-1: Location of the Koomaringa AP.





### 1.3.1 Wiradjuri country

The Koomaringa AP is located within the southern extent of the Wiradjuri tribal and linguistic group (Tindale 1974). The Wiradjuri tribal area is in the Murray Darling Basin and traverses three general physiographic regions: the highlands or central tablelands in the east, riverine plains in the west, and the transitional western slope zone in between (White and Cane 1986). The Wiradjuri is one of the largest language groups in New South Wales, and although the area is considered to have a single language, various dialects were found throughout the region (Tindale 2000).

The presence of Aboriginal people in Wiradjuri Country has been dated to at least 30,000 BP (years before present) based on evidence from Cuddie Springs near the Macquarie Marshes (Field and Dodson 1999).

At the beginning of the nineteenth century the Wiradjuri group occupied the area to the south of the Murrumbidgee River and east of the Lachlan River (Kass 2003:10). The woodland communities of the region provided habitat for possums (used for meat and fur), reptiles and birds (Kabaila 1995). The Murrumbidgee River was a source of mussels and fish, including the Murray cod (Heritage Office 1996:132). The country between the rivers provided seasonal plants, tubers, nuts, seeds, and daisy yams. Larger game such as kangaroos and emus were hunted, contributing to an overall nutritious and varied diet (Heritage Office 1996:132). Small groups moved around regularly according to seasonal resource fluctuations and ritual obligations (Kass 2003). A relatively large number of carved trees are associated with important sites marked out by clans, including burial sites (Kass 2003:10).

Wiradjuri social organisation appears to have been based upon extended kinship networks involving totemic designations and associations. The kinship system governed and controlled marriage and determined ceremonial obligations. Individual identity and clan affiliations were expressed partly through skin cloaks elaborate carvings on wooden implements (White and Cane 1986:61).

### 1.3.2 Landscape context

The Koomaringa AP is in the bioregion of Cobar Peneplain and sub-bioregion of the Lachlan Plains. The Cobar Peneplain extends from south of Bourke to just north of Griffith. The Lachlan River traverses the bioregion in the south with many minor runoff drainage lines and smaller streams. The Cobar Peneplain has a topographic landscape consisting of rolling downs and flat plains, with stony ridges and ranges. The Lachlan Plains sub-bioregion are characterised by strike ridges of resistant rocks following fold patterns, as well as low rounded hills of granite with sparse outcrops and wide short valleys which connect to Lachlan floodplains (NPWS 2003).

The Koomaringa AP is also located in the Cocoparra Ranges and Foothills landscape as defined by Mitchell (2002). Mitchell describes this landform unit as having steep crested ranges, ridges and hills and an overall relief up to 260 metres (m) (Mitchell 2002:36).

The Koomaringa AP is situated in a small valley between two ridges to the west and east. The ridge located in the western half of the Koomaringa AP is Scrubby Ridge. Mount Melbergen, part of the ridge, is located 900 m southwest of the Aboriginal Place boundary, while Flagstaff Hill is 580 m to the southeast.

The geology of the Lachlan Plains is characterised by Devonian quartz sandstone and conglomerate, with small areas of granite, as well as Quaternary colluvial slope mantles and alluvium (NPWS 2003). Mitchell characterises the geology of the Cocoparra Ranges and Foothills as boulder hill slopes with extensive rock outcrops (Mitchell 2002).

The Koomaringa AP has an area of basalt suitable for quarrying as blue metal. Prior to the existing extraction, a basalt dyke was located through the southern centre of the Koomaringa AP. The eastern and western sides of this basalt dyke resulted in contact metamorphism of Devonian quartzite which caused the quartzite to anneal into felsite (Witter 1987). Felsite outcrops are located throughout the immediate vicinity of the existing blue stone quarry.

There are numerous minor drainage lines throughout the Koomaringa AP. Some of these drainage lines traverse along the western and eastern halves of the Koomaringa AP. All drainage lines are non-perennial and would only have running water after rainfall. The closest named creeks to the Koomaringa AP are Naradhan Creek 16.5 km northeast, Cocoparra Creek 20 km southeast and Begargo Creek 30 km north.

### **1.3.3 Local development**

Western Riverina Quarry (WRQ), also known as Koomaringa Quarry, was originally granted development consent by the Carrathool Shire Council on 25 May 1987 with a modified development consent granted on 19 July 1991.

WRQ will continue to operate under its existing approval with no end date specified. However, WRQ is seeking development consent over an expanded quarry area, and while development consent is not granted yet, it is expected to be granted in 2024.

WRQ is seeking consent to extract basalt and quartzite from within the approved disturbance area to produce up to 250,000 tonnes per year (tpa) of quarry products. The fragmented basalt is loaded and hauled to a fixed crushing and screening plant for processing prior to stockpiling and product despatch. It is noted that some aggregates are pre-coated within the processing area prior to despatch and that the approval includes importation of up to 1,500tpa of concrete washout and other construction materials for recycling and incorporation into products produced within the WRQ.

An archaeological survey was carried out by OzArk Environment & Heritage (OzArk) in October 2019 as part of an Aboriginal Cultural Heritage Assessment Report (ACHAR) to inform a development application to expand the WRQ, and to help better inform this Plan (OzArk 2024). A representative of the Griffith Local Aboriginal Land Council (LALC) accompanied the OzArk archaeologist during the survey. The survey focused on the immediate areas surrounding the existing extent of WRQ, as well as ground truthing the location of Site A and Site B. During the survey, an additional 19 Aboriginal sites were recorded. Details of these sites and the ground truthing of Site A and Site B are provided in **Section 1.4.2**.

In late 2023, Wiradjuri stakeholders spent a total of six days at the Koomaringa AP advising on the location of protective fencing and inspecting the Koomaringa AP. These visits resulted in an additional 14 sites being recorded at the Koomaringa AP.

#### 1.3.4 Tenure and boundaries

The Koomaringa AP is within Lot 12 DP1286927 that is owned by E.B. Mawson & Sons Pty Ltd<sup>1</sup> (**Figure 1-1**). It is noted that the cadastral boundaries and Lot and Deposited Plan (DP) numbers have changed since the time the Koomaringa AP was gazetted in 1991, with the boundary of the Koomaringa AP described in the gazette as:

*‘County Cooper, Parish Cocoparra, being part portion 3, commencing at a point on the western boundary of portion 3 aforesaid distance 29000 metres from the north-western corner of that portion and bounded on the north by a line bearing 90 degrees magnetic to the north western boundary of Lachlan Range State Forest No. 840 (No. 4 Extension), on the south-east by that boundary south-westerly to the south-western boundary of portion 3 aforesaid and on the south-west and west by parts of that south-western and western boundaries of that portion to the point of commencement.’*

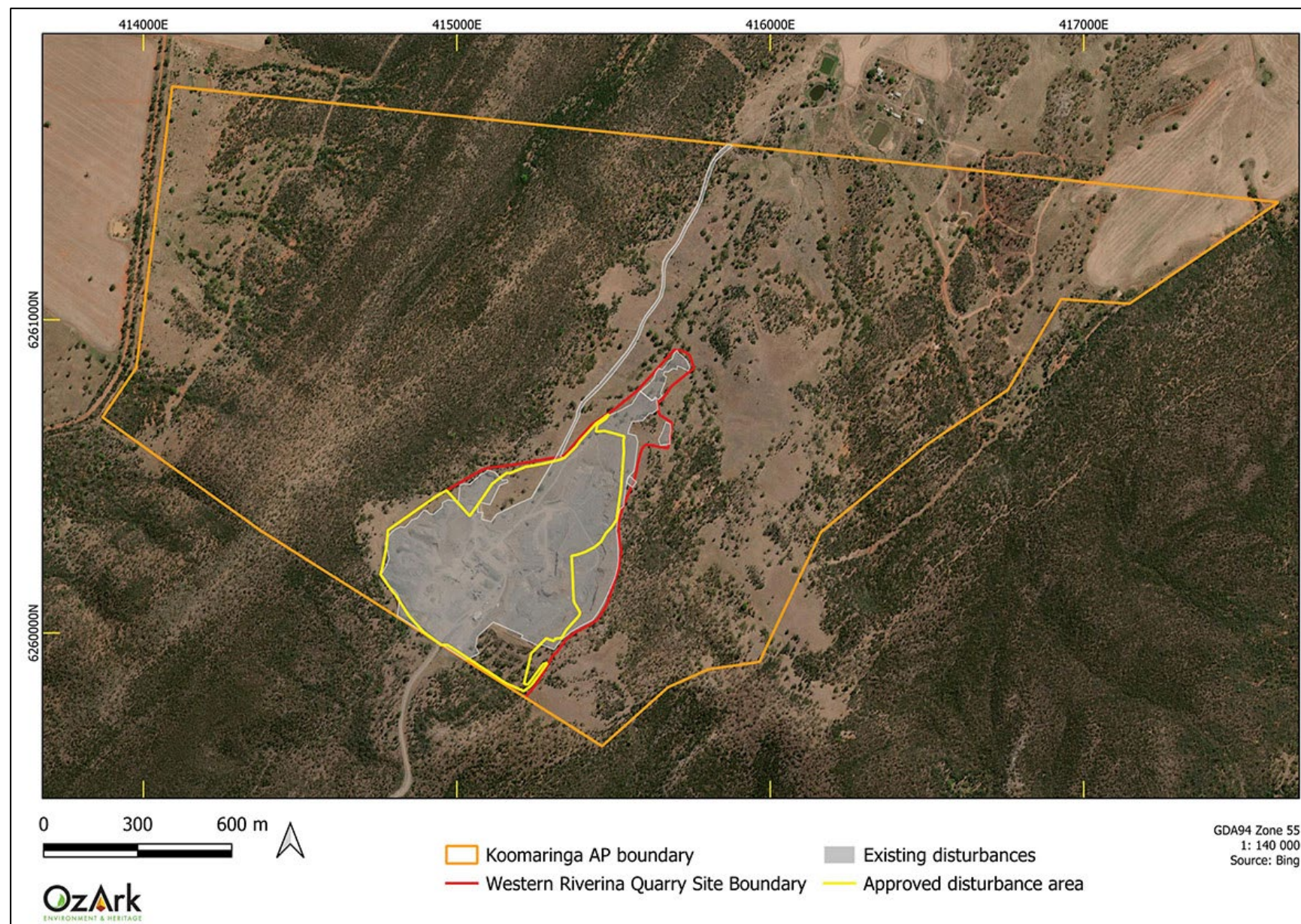
New South Wales Government Gazette 1991

The WRQ blue stone quarry, currently owned and operated by E.B. Mawson & Sons Pty Ltd, is encompassed within the registered curtilage of the Koomaringa AP. The current boundary of the quarry relative to the boundary of the Koomaringa AP is shown on **Figure 1-2**. Existing disturbances associated with the quarry encompass most of the area within the Quarry Site’s boundary.

<sup>1</sup> While E.B. Mawson & Sons Pty Ltd is the current owner, any reference to E.B. Mawson & Sons Pty Ltd in this Plan will refer to any owner of the land containing the Koomaringa AP.



Figure 1-2: Location of the WRQ within the Koomaringa AP.





### 1.3.5 Historical management arrangements within the Aboriginal Place

The draft Statement of Management Intent (SMI) from The Office of Environment and Heritage (OEH) 2019 (now Heritage NSW; HNSW) has the following recommendations (in part). These management directions are continued in this Plan (**Section 3**).

- Non-invasive Aboriginal Regional Assessments, and anthropological, archaeological, and historical research into past Aboriginal use of the area, will be encouraged and supported. However, if the area is recognised as being of spiritual value, no invasive work should be permitted
- Aboriginal sites and objects in the Aboriginal Place will be identified, conserved, recorded and managed in accordance with their significance. Any Aboriginal sites and objects of potential Aboriginal heritage significance discovered within the boundaries of the Aboriginal Place will be reported to OEH (HNSW) staff (see section 89A of the *National Parks and Wildlife Act 1974*) and recorded in the Aboriginal Heritage Information Management System, and the condition of known sites and objects will be monitored
- The risk of harming Aboriginal objects and places should be minimised wherever possible. Any proposed invasive work should be considered on a case-by-case basis
- Aboriginal knowledge gathered by OEH (HNSW) will be respected and protected
- All day-to-day and longer-term management decision making and implementation of works and other activities should be made with reference to the developed management plan: no action should be taken if it would have any adverse impact on the significance of the place
- Resolution of any conflicts regarding management and change should give priority to Aboriginal cultural values
- The local Aboriginal community should continue to be encouraged to visit the place to continue cultural and spiritual practices, through informal or legal agreements with landowners/land holders/occupiers. Permission of the landowner to access the land should be obtained along with conditions such as roles and responsibilities in controlling, accessing, and using the land
- OEH (HNSW) will enable Aboriginal communities to determine the level of information on the Aboriginal Place that is to be made available, such as location, stories, and significance, as well as whether or not signs are to be erected on the site or place
- The stakeholder and landowners will take steps to mitigate the harm to Aboriginal Places which may be caused by animals
- Actions designed to ensure continuity of cultural practices should be encouraged, such as replanting bush foods, retaining vegetation of high cultural value, and integrating cultural and natural heritage considered during land use planning
- Landscape restoration programs should account for potential impacts on Aboriginal objects. The use of culturally significant plants in revegetation projects should be encouraged

- Surface archaeological surveys that may be required should be undertaken by an archaeologist or Aboriginal Cultural Heritage Officer who is sensitive to Aboriginal issues and can work closely with the local Aboriginal community, and as set out in the Code of practice for archaeological investigation of Aboriginal objects in NSW (DECCW 2010). Acts carried out in accordance with this code do not require an Aboriginal Heritage Impact Permit
- Increase public awareness of the existence of the Aboriginal Place and the significance of the particular place
- Stakeholders and landowners will be encouraged to consider the need for buffer zones around specific, sensitive sites within the Aboriginal Place
- Traditional, contemporary, and post-contact stories, knowledge and management practices should influence ways in which the land is managed and used.
- Moveable objects of cultural significance will be conserved in situ wherever possible. If objects are moved, they should be moved in accordance with an Aboriginal Heritage Impact Permit, assessed for significance under the *Heritage Act 1977* and professionally recorded, collected, and stored.

There are a series of recommendations stemming from two archaeological studies undertaken in 1987. These studies primary focus was the recording of Site A and Site B and ensuring that the sites were adequately fenced to avoid inadvertent harm. Therefore the management recommendations in these reports mostly deal with fencing the sensitive archaeological areas from inadvertent harm. This intent to protect Site A and Site B from harm is also a focus of this Plan. The recommendations of Witter to plan Site A and Site B was completed both by Byrne 1987 and OzArk 2019.

- Management recommendations from Witter (1987):
  - Production of a large base map. This should be a map which would include roughly a 500 x 500 m area at a scale of about 1 cm = 10 m. This could be made using the 1:50,000 topographic map, aerial photos if available, a compass, the odometer of a vehicle and pacing. The map should show the gullies which cut through the area and indicate the hills and ridges
  - Plotting in the archaeological material. This should be done by shading in areas of flaked debris on the base map. Bed rock anvils also should be located and labelled as well as other items with lake removal or retouch
  - Marking out. Although the archaeological site is not to be mined, it is in a very sensitive zone and vulnerable to indirect developmental impact. Such indirect effects could be in the form of casual access routes, inadvertent rock removal or dumping, placement of crushing machinery, parking of plant or heavy equipment etc. which might occur around the edge of the blue metal quarry. The prehistoric site therefore needs to be marked out for a barrier fence. The use of white topped star pickets should be adequate for this task. It is probable that about 20 star pickets would be needed on the eastern side and about 20 star pickets on the western side. Even though only "Area A" is anticipated for mining at the outset, it

is important that the entire site is marked out for a barrier fence. If future development expands, or the blue metal quarry changes ownership, or in the case of various unforeseen events, it will be clear to all concerned where the archaeological site is

- Barrier fence. The barrier fence should include a 50 m buffer zone in the basalt for protection to the archaeological site. The fence need not be of a stock-proof type, but should prevent heavy equipment operators from crossing it, or other mining activities straying onto the site.
- Management recommendations from Byrne (1987):
  - The framework for the management of the site was set out by Witter in his report of February 1987. He recommended that, although the proposed basalt quarry operation would not directly impact the site, these operations would be sufficiently close to make the site vulnerable to indirect impact - e.g., by vehicle traffic. To protect the site it would be necessary to instal a barrier fence between the site and the basalt operations in both Area 'A' and Area 'B'. Allowance should be made for operations in both Area 'A' and Area 'B'. Allowance should be made for a 50 m buffer zone between the site and the fence
  - It should be recognized here that felsite percussion material, presumably deriving from the site, has been observed at various places on the Koomaringa property. Any impact by farm practices on these occurrences is likely to remain at the level common to most farming properties (e.g., vehicle track, dam, and farm building construction together with field cultivation). The nature of this impact is likely to remain constant in the foreseeable future and is not considered to constitute a management problem.

In response to the recommendations made by Witter and Byrne, the National Parks and Wildlife Service (NPWS) in 1987 marked out an appreciate barrier to protect Site A and Site B with wooden stakes. A site visit by OzArk in 2023 confirmed that these wooden stakes remain in place (albeit sometimes knocked over) and that existing quarry disturbances remain outside of this marked buffer.

At the request of the Wiradjuri stakeholders for the WRQ, and with the assistance of the Wiradjuri stakeholders, E.B. Mawson & Sons Pty Ltd in late 2023 permanently fenced Site A and Site B, as well as so-called 'Site C' that is an amalgam of an amalgam of sites Koomaringa PL-01 (42-5-0023), Koomaringa OS-11 (42-5-0020), and Koomaringa Grind Groove 1 MS (42-5-0062). This fenced area includes a larger area of land than was protected by the NPWS in 1987 and provides even greater protection for the sites (**Figure 1-3**).

Recommendations associated with the Revision 3 *WRQ Expansion Aboriginal Cultural Heritage and Historic Heritage Assessment Report* (OzArk 2024) that relate to the management of Aboriginal cultural heritage within the Quarry Site are:

- Three sites are located within the approved disturbance area for the WRQ, 42-5-0012 (Koomaringa IF-03), 42-5-0022 (Koomaringa OS-13), and 42-5-0064 (Koomaringa

Anvil 1). Koomaringa OS-13 and Koomaringa IF 03 will be salvaged through the recording and collection of the surface artefacts and Koomaringa Anvil 1 will be relocated to a safe location prior to any works proceeding. The salvage of these sites will require an Aboriginal Heritage Impact Permit (AHIP) that has not yet been approved. Any conditions within the AHIP consent will be adhered to.

- WRQ will avoid any inadvertent harm to the remaining 31 Aboriginal sites by following the management and mitigation measures outlined below:
  - Site A, Site B, and 'Site C'. To continue to protect these sites from inadvertent impacts, the sites have been fenced. The fencing for Site A includes Site A, Koomaringa IF-01, Koomaringa IF-02, Koomaringa OS-04, Koomaringa OS-12, Koomaringa Hammer Stone 1, Koomaringa Scar 1, Koomaringa Axe Blank 1, and Koomaringa Stock Plie (sic) 1 and the fencing for 'Site C' includes Koomaringa OS-11, Koomaringa PL-01, and Koomaringa Grind Groove 1 MS. The fencing at Site B only includes Site B (**Figure 1-3**).
  - There are 19 additional sites located away from the approved disturbance area for the WRQ that are unfenced (Koomaringa OS-01, OS-02, OS-3, OS-05, OS-06, OS-07, OS-8, OS-09, OS-10, PL-02, ST-01, Koomaringa Hearth 1, Koomaringa PAD 2 MS, Koomaringa PAD 1 MS, Koomaringa Large White Core 1, Koomaringa Anvil 22.12.23, Koomaringa Scar Tree 21.12.23, Koomaringa PAD Site 21.12.23, and Koomaringa Large Core Stone 1). To protect these sites from any inadvertent impacts during the life of the quarrying operations, it is recommended that two star pickets with a sign attached between them be installed at each site facing the most obvious direction of travel from the quarry area.

The conditions in the approved Development Application for the WRQ (DA 2022/29) govern the management of Aboriginal cultural heritage within the WRQ quarry site boundary. As the WRQ is within part of the Koomaringa AP, the management measures in DA 2022/29 are primarily related to the conservation of Aboriginal sites as they apply to sites within the WRQ, or in close proximity.

## 1.4 CULTURAL HERITAGE VALUES

### 1.4.1 Cultural values

This area of assessment concerns the importance of a site or features to the relevant cultural group: in this case the Aboriginal community. Aspects of social value include assessment of sites, items, and landscapes that are traditionally significant or that have contemporary importance to the Aboriginal community. This importance involves both traditional links with specific areas, as well as an overall concern by Aboriginal people for their sites generally and the continued protection of these. This type of value may not be in accord with interpretations made by the archaeologist: a site may have low archaeological value but high social value, or vice versa.



Based on comments from the Griffith LALC site officers in the field during the 2019 survey, the Koomaringa AP has high social and cultural value. On 25 January 2019 Mr Ethan Williams on behalf of the Griffith Local Aboriginal Land Council wrote:

*This unique Wiradjuri Aboriginal quarry is of enormous spiritual and cultural significance to many Aboriginal groups and communities throughout this Region, and needs to be afforded the cultural respect, appreciation and protection it deserves.*

On 26 November 2023 Wiradjuri stakeholder Mark Saddler wrote about his values attached to the Koomaringa AP:

*Koomaringa is a very spiritual place for my Wiradjuri people and as such has many special places, songlines and dreaming places that my people have cared for and continue to have connection to for over 80,000 + years.*

In a letter to E.B. Mawson & Sons Pty Ltd on 29 November 2023, Wiradjuri stakeholder Robert Carroll, referring to the values of the Koomaringa AP, wrote:

*What astounded Roley, I and everyone else who has ever visited the site was its overall size, which included A & western Cultural B tool making sites and the sheer numbers of mounds of worked felsite debitage or tailing's, artefacts, bedrock anvils and the percussion scars that are clearly visible on the remaining felsite vein which were created by ancient Wiradjuri tool makers smashing larger basalt blocks into it to gather core material for further working.*

It is very clear from these responses that the Aboriginal community have deep cultural values attached to the Koomaringa AP.

#### **1.4.2 Scientific values**

Assessing a site in the context of archaeological and scientific value involves placing it into a broader regional framework, as well as assessing the site's individual merits in view of current archaeological discourse. This type of value relates to the ability of a site to answer current research questions and is also based on a site's condition (integrity), content and representativeness.

The overriding aim of cultural heritage management is to preserve a representative sample of the archaeological resource. This will ensure that future research within the discipline can be based on a valid sample of the past. Establishing whether a site can contribute to current research also involves defining 'research potential'. Questions regularly asked when determining significance are:

- Can this site contribute information that no other site can?
- Is this site representative of other sites in the region?

Prior to operations commencing at the WRQ, two archaeological assessments were undertaken by Witter 1987 and Byrne 1987. These studies recorded the main sites, Sites A and B, and informed the declaration of the Koomaringa AP. In 2019, OzArk inspected Sites A and B and the immediate surrounds. These studies provide the base line information for the Koomaringa AP.

The Koomaringa AP has significance as a relatively intact archaeological site with extensive evidence of traditional quarrying activities. The results of a survey by OzArk in October 2019 concluded that in addition to the previously recorded Site A and Site B (registered as a single site), 19 additional Aboriginal sites are located within or near the WRQ within the Koomaringa AP. In December 2023, Wiradjuri stakeholders undertaking a site inspection of the Koomaringa AP recorded a further 14 sites. Therefore, there are 34 known sites in the Koomaringa AP (excluding the AHIMS registration of the AP itself) (**Figure 1-4**).

The Koomaringa AP has a high archaeological/scientific significance. The known main quarrying locations of felsite (Site A and Site B: both listed under the single AHIMS registration: #42-5-0004) at the Koomaringa AP are unique to the region, and there are no other Aboriginal quarrying sites recorded within 20 km of the Koomaringa AP. Site A and Site B both have fine grained felsite bedrock eroding from either a ridge top or drainage line which have been quarried. At both locations, there is also large primary flakes,debitage, and cores present. **Figure 1-5** shows representative photographs of Sites A, B, and C. There is anecdotal evidence that Aboriginal stone artefacts made from felsite have been noted around the areas of West Wyalong and Lake Cargelligo (pers. comm. Sam Kirby 2019 formerly of the Department of Planning and Environment [DPE]) and further west of the Koomaringa AP (pers. comm. Max Harris 2019, site officer from the Griffith LALC).

Several of the artefact scatters have potential archaeological deposits (PAD) associated with them: Koomaringa OS-02, OS-04, OS-05, OS-07, OS-08, OS-10, Koomaringa PAD 1 MS, and Koomaringa PAD 2 MS. These sites are all located on the banks of drainage lines in undisturbed areas. Based on the survey conducted in October 2019, it is likely there would be further artefact sites in similar locations, i.e. on the flat banks of drainage lines where disturbance is minimal. A selection of photographs of the sites recorded at the Koomaringa AP are shown on **Figure 1-6**.

As the Aboriginal quarry site and a variety of other sites are conserved within their environment, the Koomaringa AP has high scientific values.

**Table 1-2** summarises the Aboriginal sites recorded to date at the Koomaringa AP and **Figure 1-4** shows the location of these sites.

**Table 1-2: Sites recorded at the Koomaringa AP.**

Site Name	AHIMS ID	GDA94 Zone 55 Easting	GDA94 Zone 55 Northing	Features
Site A (other sites within the Site A fencing are shown in a green shade below)	42-5-0004	415511	6260201	Felsite bedrock which has signs of Aboriginal quarrying. Artefacts also present at site, as well as possible waterholes and grinding grooves in bedrock.
Site B		415295	6260661	Felsite bedrock which has signs of Aboriginal quarrying. Artefacts also present at site, as well as possible waterholes in bedrock.
Site C	42-5-0020 (Koomaringa OS-11)	414784	6260133	Low density artefact scatter
	42-5-0023 (Koomaringa PL-01)	414729	6260203	Felsite bedrock which has signs of Aboriginal quarrying
	42-5-0062 Koomaringa Grind Groove 1 MS	414725	6260185	Single grinding groove
Koomaringa IF-01	42-5-0010	415541	6260025	Isolated artefact
Koomaringa IF-02	42-5-0011	415597	6260579	Isolated artefact
Koomaringa IF-03	42-5-0012	415166	6259950	Isolated artefact
Koomaringa OS-01	42-5-0013	415688	6260639	Low density artefact scatter
Koomaringa OS-02	42-5-0014	415749	6260802	Low density artefact scatter and associated potential archaeological deposit (PAD)
Koomaringa OS-03	42-5-0016	415492	6259919	Low density artefact scatter
Koomaringa OS-04	42-5-0015	415640	6260394	Moderate-high density artefact scatter and associated PAD
Koomaringa OS-05	42-5-0026	415659	6260988	Low density artefact scatter and associated PAD
Koomaringa OS-06	42-5-0027	415706	6260914	Low density artefact scatter
Koomaringa OS-07	42-5-0028	415673	6260928	Low density artefact scatter and associated PAD
Koomaringa OS-08	42-5-0017	415740	6261095	Moderate density artefact scatter and associated PAD
Koomaringa OS-09	42-5-0018	415564	6260783	Low density artefact scatter
Koomaringa OS-10	42-5-0019	415770	6260698	Moderate density artefact scatter and associated PAD
Koomaringa OS-12	42-5-0021	415276	6259956	Low density artefact scatter
Koomaringa OS-13	42-5-0022	415093	6260388	Low density artefact scatter
Koomaringa PL-02	42-5-0025	415812	6260344	Felsite bedrock which has signs of Aboriginal quarrying
Koomaringa ST-01	42-5-0024	415740	6260533	Scarred tree
Koomaringa Hearth 1	42-5-0063	415274	6260715	Burnt clay nodules
Koomaringa Anvil 1	42-5-0064	415207	6259864	Single anvil
Koomaringa Hammer Stone 1	42-5-0065	415447	6259944	Broken hammer stone with pitting
Koomaringa Scar 1	42-5-0066	415569	6260039	Single scar in box tree
Koomaringa PAD 2 MS	42-5-0067	415648	6260979	PAD with visible artefacts
Koomaringa PAD 1 MS	42-5-0068	415645	6260907	PAD with visible artefacts

Site Name	AHIMS ID	GDA94 Zone 55 Easting	GDA94 Zone 55 Northing	Features
Koomaringa Large White Core 1	42-5-0069	415721	6260405	Core, potential manuport
Koomaringa Anvil 22.12.23	42-5-0070	414841	6260441	Single anvil
Koomaringa Scar Tree 21.12.23	42-5-0071	415461	6261110	Single scar in box tree
Koomaringa PAD Site 21.12.23	42-5-0072	415442	6260843	PAD with over 200 artefacts
Koomaringa Large Core Stone 1	42-5-0073	415371	6260760	Large core
Koomaringa Axe Blank 1	42-5-0074	415392	6259911	Axe blank
Koomaringa Stock Plie 1	42-5-0075	415376	6260001	Rock tool mound

### 1.4.3 Aesthetic values

This value encompasses the sensory, scenic, architectural, and creative aspects of a place. It is often closely linked with the social values. It may consider form, scale, colour, texture and material of the fabric or landscape, and the smell and sounds associated with the place and its use (Burra Charter 2013).

Notwithstanding the presence of the WRQ within the Koomaringa AP, the Koomaringa AP preserves an extensive example of an Aboriginal stone procurement area that maintains the aesthetic qualities of the immediate area. The features are manifest in the landscape and can be interpreted by the layperson. As the Aboriginal quarry and other sites are preserved within their natural environment, the Koomaringa AP has high aesthetic values outside of the immediate confines of the WRQ.

### 1.4.4 Historic heritage values

Historic value refers to the associations of a place with a historically important person, event, phase, or activity in an Aboriginal community. Historic places do not always have physical evidence of their historical importance (such as structures, planted vegetation or landscape modifications). They may have 'shared' historic values with other (non-Aboriginal) communities.

Places of post-contact Aboriginal history have generally been poorly recognised in investigations of Aboriginal heritage. Consequently, the Aboriginal involvement and contribution to important regional historical themes is often missing from accepted historical narratives. This means it is often necessary to collect oral histories along with archival or documentary research to gain enough understanding of historic values.

There are no currently identified places of historic value within the Koomaringa AP as there is no evidence of association with important people or events in the historic period.



### 1.4.5 Statement of significance

A statement of significance for the Koomaringa AP has been presented in the SHI database:

*Koomaringa AP contains a stone quarry utilised in pre-contact times. Aboriginal people quarried felsite volcanic lava by dropping or throwing blocks of stone against a boulder (anvil) surface until large rock pieces became detached. The detached rocks would then be further broken down to create 'blanks' (partly shaped implements) from which completed tools could be manufactured. A large amount of waste material was produced in the production of the blanks and finished tools.*

*The quarry at Koomaringa AP is unique in the area, and the remains of felsite tools and flakes quarried and made here can be found throughout the region. As well as providing material evidence of the various steps involved in tool-making, quarries are important because they can provide information about Aboriginal trade routes.*

The letter and questionnaire sent to the identified Wiradjuri stakeholders (**Section 2.1**) requesting amendments or additions to the statement of significance did not receive any responses. A draft of this Plan of Management was sent to the Wiradjuri stakeholders on 28 April 2023 with a follow up email sent on 12 April 2023. In response to the review of the draft Plan, Peter Ingram summarised his values associated with the Koomaringa AP (**Appendix 3**):

*The Rankins Springs ACH stone quarry is an important significant area Wiradjuri people. The silcrete stone is only found in that area (for) miles around and would have been accessed, traded and utilised over the lower Murrumbidgee to the lower Lachlan River area. Now Rankin Springs stone quarry is not just important because of the resources of stone. The local area was inhabited seasonal by all local mob/people for ceremony/lore and sustainable resource able living. There's are fresh water Rockwell's/water springs (only meter away from the AP site) certain diverse vegetation and variety (of) native animal species that call that place home. Very significant area (a large Quandong tree near the homestead).*

Figure 1-3: Location of the fenced extents of heritage sites.

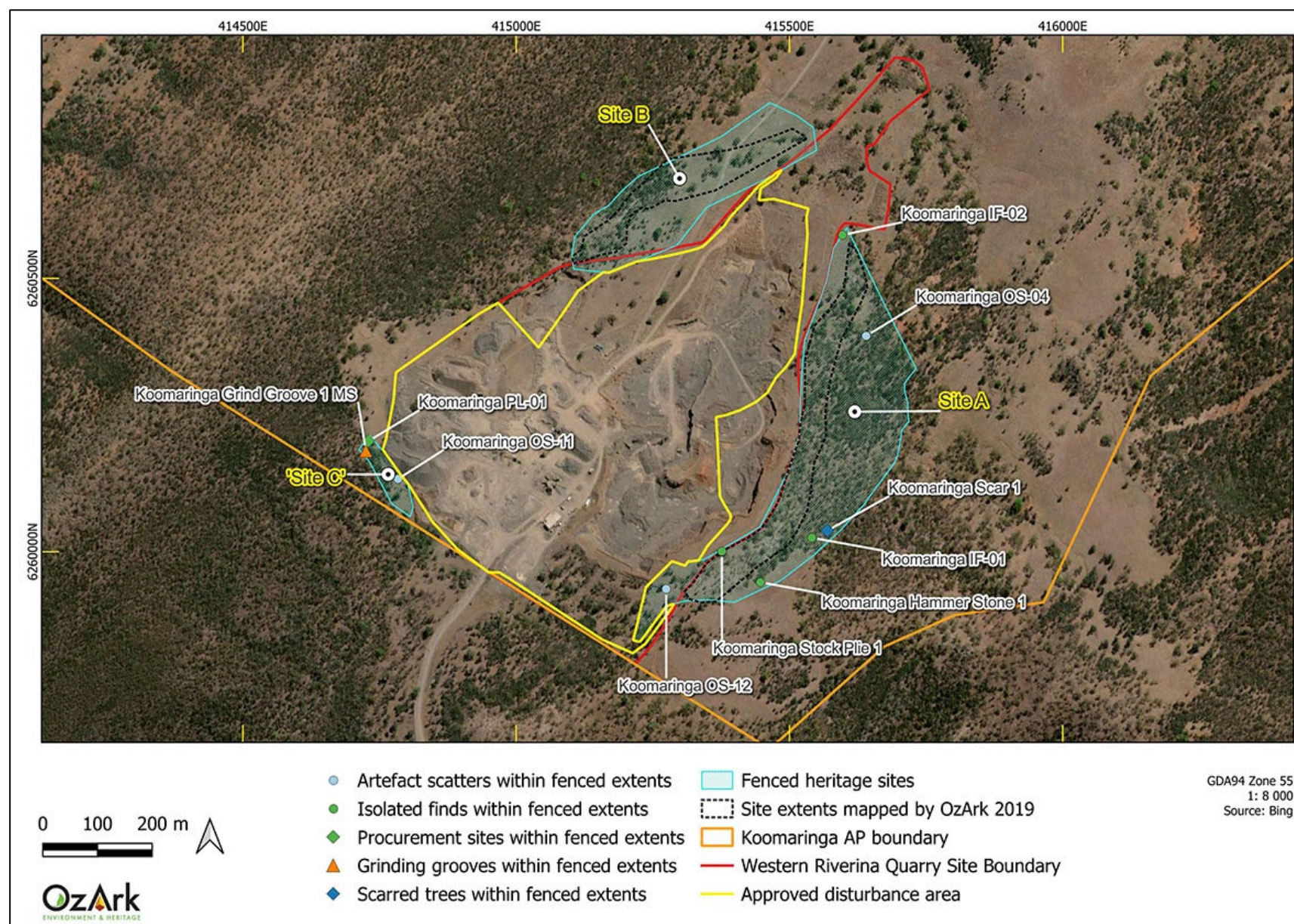
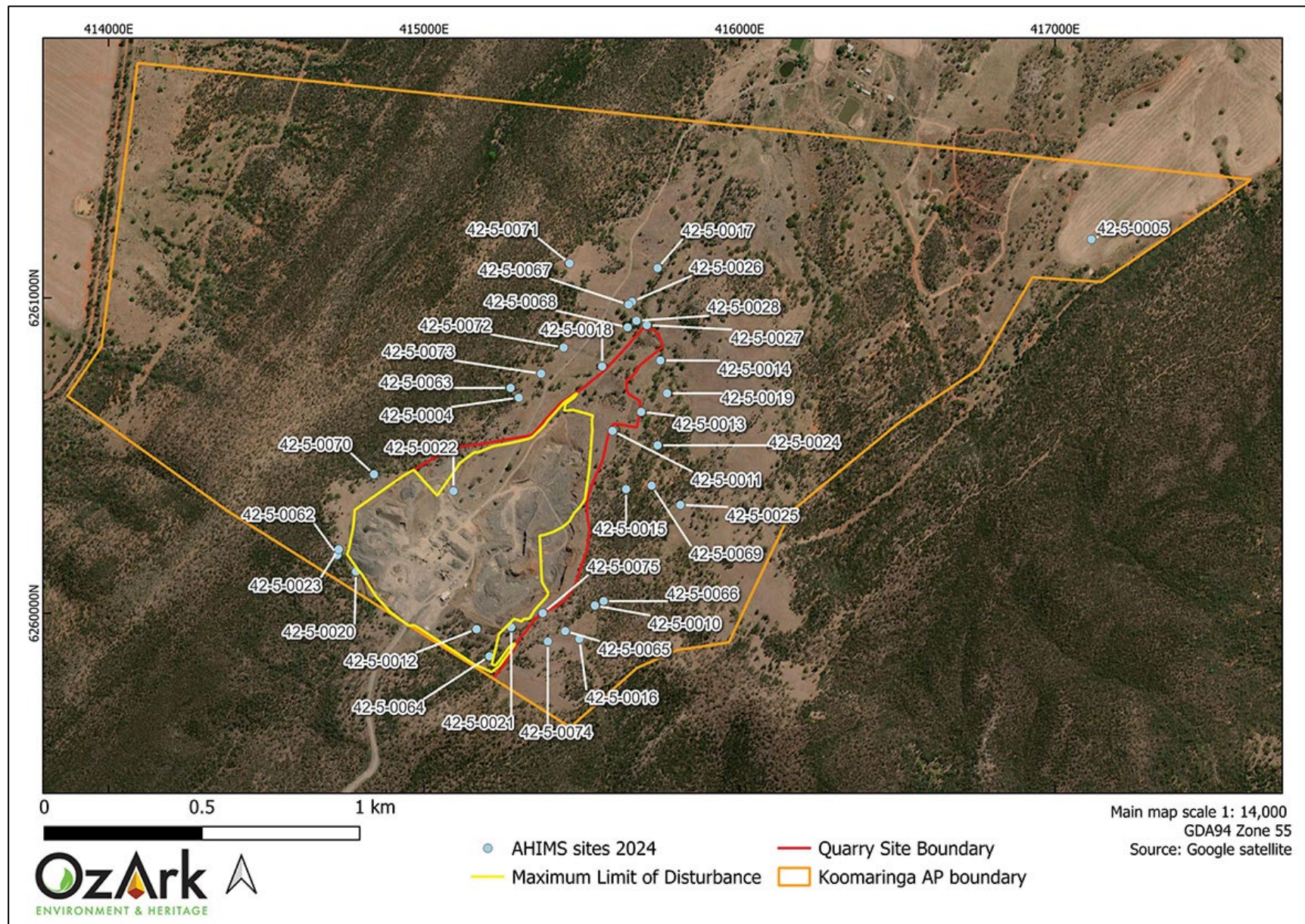










Figure 1-4: Location of known Aboriginal sites within the Koomaringa AP.







**Figure 1-5: Images of Site A, Site B, and Site C.**

	
1: View north of Site A.	2: View south of Site A.
	
3: View northeast of Site B with quarrying location.	4: View north of Site B from southern extent.
	
5: View of Koomaringa OS-11 within Site C.	6: View of Koomaringa PL-01 within Site C.



**Figure 1-6: Selection of sites and artefacts recorded at the Koomaringa AP.**

	
<p>1: View north of Koomaringa OS-02.</p>	<p>2: Detail of a core recorded at Koomaringa OS-02.</p>
	
<p>3: View northwest of Koomaringa OS-06.</p>	<p>4: Selection of artefacts recorded at Koomaringa OS-06.</p>
	
<p>5: View southwest of Koomaringa OS-12.</p>	<p>6: Artefact from Koomaringa OS-12.</p>

	
7: View north of Koomaringa ST-01.	8: View east of Koomaringa ST-01.

## 1.5 RELEVANT LEGISLATION AND POLICY

### 1.5.1 Heritage NSW – Aboriginal heritage management

Aboriginal cultural heritage inside Aboriginal Places is managed by a management plan for the specific Aboriginal Place under the NPW Act. The regulatory process for Aboriginal Places is outlined in OEH 2017. The management plan needs to provide a clear record agreed to by the Aboriginal community and HNSW regarding actions that:

- Will not harm the values of the place and not require an AHIP
- Would harm the values of the place and require an AHIP, however, these actions may be acceptable in certain situations and with certain controls
- Would harm the Aboriginal place and necessitate the refusal of an AHIP by HNSW.

If any proposed activity inside an Aboriginal Place is not consistent with the statement of values or the management plan, then an application for an AHIP will be necessary. If the proposed activity will harm Aboriginal objects inside the Aboriginal Place in any way, then an AHIP is required.

An AHIP would not be required, if the activities are specifically carried out under a s.69B NPW Act conservation agreement if the agreement was entered into or modified after 1 October 2010. In such cases, an AHIP will not be necessary.



Should any significant historic heritage items become known in the Koomaringa AP, their protection is set out in the NSW *Heritage Act 1977* (Heritage Act).

### **1.5.2 Local government planning and land use**

As of March 2024, the Koomaringa AP was zoned under Carrathool Shire Council's Local Environmental Plan (LEP) 2012 as RU1 primary production.

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## 2 MANAGEMENT PLAN STAKEHOLDERS

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### 2.1 WIRADJURI STAKEHOLDERS

The Koomaringa AP is an important place valued by the Wiradjuri people. The current Wiradjuri stakeholders include:

- Paul Brydon
- Robert Carroll & Neerim Carroll (Miyagan Culture & Heritage)
- Griffith LALC
- James Ingram (Bidya Marra) (late registration 3.1.24)
- Judy Johnson
- Mark Saddler (Bundy Culture) (late registration 3.1.24)
- Wiradjuri Council of Elders
  - Peter Ingram
  - Ray Woods
  - Yalmambirra
  - Robert Clegg

The names of Wiradjuri stakeholders listed above have elected to be consulted with so far. Further names may be added as consultation continues.

### 2.2 OTHER PARTIES

Other stakeholders include:

- E.B. Mawson & Sons Pty Ltd (owner of the land covered by the Koomaringa AP)
- Rockwoods Investment Group Pty Ltd (company which is preparing this Plan).

The stakeholders were engaged throughout the development process of the Plan by representatives from HNSW.

All the stakeholders have a common goal of protecting and managing the cultural and natural values of the Koomaringa AP. Other stakeholders may be identified in the future and an aim of this Plan is to ensure that any future additional stakeholders understand the reasons why the Koomaringa AP has been declared an Aboriginal Place, know the boundary of the Aboriginal Place, and understand that they cannot impact of the values of the Aboriginal Place without first assessing the potential impact of any proposed activities.



### 3 MANAGEMENT PROTOCOLS

This Plan aims to conserve and protect the cultural and natural values at the Koomaringa AP for current and future generations. The location is protected under the NPW Act.

This Plan defines future actions that may potentially harm the values at the Koomaringa AP, and such impacts cannot occur without first obtaining an AHIP.

Mr Peter Ingram in his response to the draft Plan on 31 May 2023 (**Appendix 3**) noted that an overall focus must be on the reinvigoration of cultural practises for future generations with certain areas within the AP designated to be used for cultural purposes.

Management protocols outline how Aboriginal Places will be managed and are agreed to by all relevant parties.

The protocols for the Koomaringa AP include:

- Establishment of the Koomaringa Management Group (**Section 3.3**)
- Heritage inductions of all staff and contractors who are permitted to work within the Koomaringa AP
- Establish and adhere to an agreed approach to risk management for any proposed works within the Koomaringa AP (**Section 3.7**)
- Applicable heritage management/assessment in accordance with the heritage management zone of the proposed works (**Section 4.4**)
- Implementation of a monitoring program by the Koomaringa Management Group on at least a two-yearly basis to inspect conditions of those Aboriginal heritage sites in proximity to the WRQ to ensure their conservation in the landscape
- Meet at least every two years to review the operation of this Plan and consider recommending amendments to the Plan.

#### 3.1 MANAGEMENT AIMS

##### 3.1.1 Wiradjuri stakeholder management aims

The Aboriginal communities' management goals and timeframes for the Koomaringa AP were obtained through consultation undertaken from 2019 to 2023.

A letter and questionnaire were sent to each of the Wiradjuri stakeholders identified in **Section 2.1** on 30 August 2021, however, no responses were received.

A draft of this Plan of Management was sent to the Wiradjuri stakeholders on 28 April 2023 with a follow up email sent on 12 April 2023. The draft Plan sought input into the community's management goals and a comprehensive response was received from Peter Ingram on 31 May 2023 (**Appendix 3**).

Peter Ingram noted that his aims with regard management include:

- *Aim to maintain, strength, and protection of vulnerable cultural values/sites*
- *Oppose a business model to run and operate the whole area for quarrying and other farming practises*
- *Bush management with firewood and hardwood collection*
- *Feral animal goat removal and international sales*
- *Fire management and routines for cultural burn activities*
- *Any other farming activities have a sustainably focus*
- *Resort, getaway, camps, tourism, youth, and mental health programs*
- *Maintain springs and Rockwell's and any other sites in the area*
- *Sustainable ways to make revenue. Without destroying landscape and cultural values of the area*
- *New signage with clear and understandable information with potential rest seating and share houses for elders to teach the next generation of old culture approaches.*

Peter Ingram in his review of the draft Plan on 31 May 2023 (**Appendix 3**) noted an overall management aim as being:

*Have a partnership/management in the interim to potentially have full ownership freehold leased of the area to maintain and continue cultural practises the future generations.*

*With management of the area there could be a financially sustainable opportunity for resources like wood, stone, feral animal management/control, natural landscape renewal with cultural activities, infrastructure to hosting a resort, youth and mental health programs could be implemented...*

*To run programs and community events in area to avoid damage, site protection, monitoring. Over just locking up the bush area, to be invaded by vermin species of animals... with horticultural agricultural structures in places to create employment for local people could be possible...for multiple generations.*

An overarching concern of the Wiradjuri stakeholders is to ensure that the culturally significant Sites A, B, and C are protected. To assist this management aim, a number of site visits were held during late 2023:

- 11 August 2023: OzArk Principal Archaeologist Ben Churcher visits site to map the 1987 site buffer pegs installed by the National Parks and Wildlife Service in 1987
- 24 November 2023: OzArk archaeologist, Jordan Henshaw, and three Wiradjuri stakeholders (Mark Saddler, James Ingram, and Robert Carroll) met on site to discuss

management measures to protect the Koomaringa AP. A record of this site visit is presented in **Appendix 3**

- 5 to 7 December 2023: Three Wiradjuri stakeholders (Mark Saddler, James Ingram, and Robert Carroll) spend three days at site determining where protective fencing should be placed and investigating the Koomaringa AP surrounding the WRQ
- 20 to 22 December 2023: Three Wiradjuri stakeholders (Mark Saddler, James Ingram, and Robert Carroll) spend three days at site ensuring the fencing has been correctly installed and further inspecting the Koomaringa AP and recording an additional 14 sites.

Additional management aims were set out in a letter dated 29 November 2023 (**Appendix 3**) by Wiradjuri stakeholder Mark Saddler:

- Damage to the Koomaringa AP caused by animals
- Adequately reinstating buffer fencing (this has been subsequently completed with the assistance of Mr Saddler)
- Equitable inclusion of all people, including Wiradjuri stakeholders, knowledge holders, and the Local Aboriginal Land Council, in the Koomaringa Management Group
- Involvement of Wiradjuri stakeholders in the fencing of the 11 sites<sup>2</sup> outside of the approved disturbance area that have not already been fenced (the ACHAR for the WRQ recommends that this work be carried out with the assistance of Wiradjuri stakeholders)
- Expressed concerns about fencing the area now denoted as 'Site C' (this has been subsequently completed with the assistance of Mr Saddler).

In a letter dated 3 January 2024 from Wiradjuri stakeholder Mark Saddler (**Appendix 3**), the following management recommendations were made (reproduced as received):

- A strong all-out effort/attempt must be made by NPWS - Heritage NSW to elevate the importance and significance of the Wiradjuri Koomaringa tool making and cultural sites to government, mainstream community, Wiradjuri Aboriginal people and communities but also to anyone and everyone who has a deep interest in the ongoing protection and promotion of traditional Aboriginal culture and history
- Four (4) Steel/aluminium signs are to be erected on steel poles at the North entrance, and just inside the individual boundary protection fences to major tool making Sites A, B and C (Which is located in a northern direction and adjacent to a massive pile of crushed rock/metal) at Koomaringa that advise of the importance of the area and also of the history of the Toolmaking site to Wiradjuri people and their traditional country. (The signs can be designed and produced at Design & Signs, Unit 2/68 Willandra Ave, Griffith – 02 69641488) These signs are to be designed by local RAPs and Aboriginal communities. The cost of the signs and their erection is to be paid for by the quarry owners.
- The ongoing monitoring of the quarry site and important cultural sites by the RAPs is to occur at least 4 times a year, these roles will be remunerated by agreed contracts.

<sup>2</sup> There are now 19 sites outside of the already established fencing.

- Feral animal “Eradication Programs” for feral pigs and goats need to be undertaken on an ongoing basis because these animals after wet weather are digging up the country, dispersing artefacts and destroying Wiradjuri sites.
- Community and individual access to Wiradjuri Cultural Places Toolmaking Sites A, B, and C at Koomaringa is to be allowed to continue into the future with appropriate times and dates agreed to by all parties.
- A proportion of the existing poor road up to Site B Toolmaking site needs to be further developed/graded which would allow vehicle access for Aboriginal Elders and other interested groups entering from the “Northern Access Gate”.
- A large “Car Park” and shelter area to be erected opposite Site A so that Wiradjuri Elders can undertake cultural training for our people as well as to non-Aboriginal people. Shelter should be large enough to accommodate at least 30 + people with some seating areas. and a Car Park for at least 10 cars.
- Cultural Training and Awareness Programs to be delivered to all staff who work on or with Koomaringa and any other quarry sites in Wiradjuri country. This will be delivered by Bundyi Culture as per an agreed contract. This must take place urgently.
- A written commitment to erect further fencing to protect additional recently identified Northern Wiradjuri cultural areas.

Responses from OzArk to these management recommendations from Mr Saddler are presented in **Appendix 3**. To the degree that is within the capacity of E.B. Mawson & Sons Pty Ltd, as owners of the WRQ, to implement, some of these recommendations have been included in the ACHAR for the WRQ. Those management aims that concern the Koomaringa AP more generally will be formulated by the Koomaringa Management Group when it forms (**Section 3.3**).

**Table 3-1** summarises the Wiradjuri stakeholder management aims that have been communicated during the consultation process.

**Table 3-1: Summary of Wiradjuri stakeholder management aims.**

Wiradjuri stakeholder management aim	Response	Where addressed in this Plan
Have a partnership/management in the interim to potentially have full ownership freehold leased of the area to maintain and continue cultural practises (for) ...future generation(s)	The Koomaringa Management Group could explore possibilities for transfer of land ownership	Not specifically addressed in this Plan. See <b>Section 3.3</b> for the establishment of the Koomaringa Management Group
(The Koomaringa AP could be a) financially sustainable opportunity for resources like wood, stone, feral animal management/control, natural landscape renewal with cultural activities, infrastructure to hosting a resort, youth, and mental health programs could being implemented	Most of these activities would require an AHIP where it would need to be clearly demonstrated that the activity would not diminish the heritage values of the Koomaringa AP	Risks associated with such activities are addressed in <b>Section 3.8</b> .
To run programs and community events in area to avoid damage. Site protection and regulations. Monitoring.	Such initiatives would be the responsibility of the Koomaringa Management Group	<b>Section 3.3</b> Monitoring of the no-go area around Sites A, B, and C will be the responsibility of the WRQ ( <b>Section 4.6.4</b> )
Horticultural agricultural structures in places to create employment for local people could be possible	Such initiatives would be the responsibility of the Koomaringa Management Group.	Risks associated with such activities are addressed in <b>Section 3.8</b> .



Wiradjuri stakeholder management aim	Response	Where addressed in this Plan
	Any ground disturbing activities would require an AHIP where it would need to be clearly demonstrated that the activity would not diminish the heritage values of the Koomaringa AP	
Reinvigoration of cultural practises for generations. Certain areas designated (for) continue(d) use	Reinvigoration of cultural practices would be a central aim of the Koomaringa Management Group. The WRQ has agreed to fund the establishment of a car park, walking track, and picnic shelter to assist with cultural connection to the Koomaringa AP	<b>Section 3.3</b> <b>Section 4.9.2</b>
Aim to maintain, strength(en), (and) protection of vulnerable cultural values/site <ul style="list-style-type: none"> <li>Bush management with firewood and hardwood collection</li> <li>Feral animal goat removal and saleyards sales international</li> <li>Fire management and routines for cultural Burns activities</li> <li>Any other farming activities sustainably focus</li> <li>Resort, getaway, camps, tourism, youth and mental health programs</li> <li>Maintain Springs and Rockwell's and any other sites in the area</li> <li>Sustainable ways to make revenue. Without destroying landscape and cultural values of the area</li> </ul>	Such initiatives would be the responsibility of the Koomaringa Management Group. Any ground disturbing activities would require an AHIP where it would need to be clearly demonstrated that the activity would not diminish the heritage values of the Koomaringa AP	Risks associated with such activities are addressed in <b>Section 3.8</b> .
These prominent Wiradjuri tool making felsite debitage mounds need to be re-established and fenced off for ongoing protection from native or feral animals such as emu's, kangaroos, pigs, and goats.	Sites have been demarcated with new fencing. While this fencing does not exclude wildlife, it will ensure that there is no inadvertent harm arising from the quarry activities.	<b>Section 4.9.1</b>
Why are there no Cultural signs on the edge of the buffer or exclusion zone that clearly explains the history, significance, and importance of the Koomaringa Aboriginal Place to various traditional and contemporary Wiradjuri Aboriginal groups and communities?	E.B. Mawson & Sons Pty Ltd has undertaken to fund this. The location and wording of any signage will be discussed with the Koomaringa Management Group when it is formed. It is imagined that the signs would recognise the significance of the Aboriginal Place and provide site access details.	<b>Section 4.9.1</b>
Why have members of various Wiradjuri Aboriginal communities and RAPs been effectively shut out of the "Koomaringa Aboriginal Place" over the past 30 odd years and yet the various owners such as Milbrae Quarries Pty Ltd and EB Mawson & Sons Pty Ltd been allowed to mine non-stop, with no-one engaged on a full-time or part-time basis to regularly monitor the impacts or effects of the mining on the Aboriginal site or on nearby Aboriginal communities?	As far as is known, no one from the Wiradjuri Aboriginal community and RAPs have ever been excluded from the Quarry Site. E.B. Mawson & Sons Pty Ltd will maintain any site demarcation fencing and signage. It will be the responsibility of the E.B. Mawson & Sons Pty Ltd to monitor site buffers at the boundary of the WRQ operational areas on a regular basis and not less than every two years. Photos from the northern, southern, eastern, and western perimeters of the approved quarry site boundary will be taken to provide evidence that quarrying activities are within the approved quarry curtilage. Monitoring will be undertaken by at least two representatives of the Koomaringa	<b>Section 4.9.1</b> <b>Section 4.6.4</b>

Wiradjuri stakeholder management aim	Response	Where addressed in this Plan
	<p>Management Group, where practicable.</p> <p>At other locations within the Koomaringa AP, the Koomaringa Management Group should explore funding options with HNSW, to organise monitoring of the Koomaringa AP on at least a two-yearly basis.</p>	
Have any of the previous or current mine owner provided any type of training or employment opportunities, educational scholarships/sponsorships or Aboriginal community development funding to Aboriginal individuals or Aboriginal communities during the life of the Koomaringa quarry, if not why hasn't this occurred?	The WRQ has worked with the Aboriginal community and has an Indigenous engagement program in place. Past efforts of engagement have been unsuccessful as local groups did not have programs in place.	Not specifically addressed
Why hasn't a road been marked out and inspected for Aboriginal cultural material and then graded which would allow for easy walking or vehicle access to eastern Cultural site A?	E.B. Mawson & Sons Pty Ltd have agreed to facilitate access to the significant cultural heritage sites near the WRQ. This includes providing a car park and arranging access visits based on staff availability (for escorts) and operations at the WRQ (i.e. access being unsafe).	<b>Section 4.9.2</b> <b>Section 4.9.6</b>
What steps WILL be enforced onto stakeholders and landholders (take steps to mitigate the harm to Aboriginal Places which may be caused by animals)?	<p>Feral animal control within the Koomaringa AP will be the responsibility of the Koomaringa Management Group who should explore funding options with HNSW to organise feral animal control. It is noted that this activity was also suggested by Mr Peter Ingram in his response to the Koomaringa AP Plan of Management.</p> <p><b>Table 3-1</b> of the Koomaringa AP Plan of Management allows poisoning of feral animals to proceed within the Koomaringa AP without further management.</p>	<b>Section 4.5</b> <b>Table 3-1</b>
I insist that buffer zones (around specific, sensitive sites within the Aboriginal Place) be enforced and not just encouraged.	This request has been completed and the fencing has been installed with the assistance of the Wiradjuri stakeholders.	<b>Section 4.9.1</b>
This point (advice will first be sought from a qualified archaeologist to determine whether the find constitutes an Aboriginal object, or a historic item of heritage significance) needs to be expanded to include that "Wiradjuri Knowledge Holders and RAPs" be included in the process of identifying our items. Archaeologists are not the knowledge holders of our culture, we are.	Advice from an archaeologist is only the first stage of identifying whether an Aboriginal object has been discovered. If the object is Aboriginal, Wiradjuri stakeholders will be consulted.	<b>Section 4.8.2</b> has been amended to include Wiradjuri stakeholders, if practical (i.e. the stakeholders can be contacted in a timely manner).
We local RAPs (Wiradjuri stakeholders) are to be involved in the process of marking these above areas (i.e. known sites outside of the approved disturbance area and Sites A, B, and C). Remuneration must also be paid for the time our people spend to do this work.	Wiradjuri stakeholders will be engaged to assist with the fencing of sites as is set out Section 9.2.4 of the WRQ ACHAR.	<b>Section 4.9.1</b>
Four (4) Steel/aluminium signs are to be erected on steel poles at the North entrance, and just inside the individual boundary protection fences to major tool making Sites A, B and C at Koomaringa that advise of the importance of the area and also of the history of the Toolmaking site to Wiradjuri people and their traditional country. These signs are to be designed by local RAPs (Wiradjuri stakeholders and Aboriginal communities. The cost of the signs and their erection is to be paid for by the quarry owners.	<p>E.B. Mawson &amp; Sons Pty Ltd has undertaken to fund this.</p> <p>The location and wording of any signage will be discussed with the Koomaringa Management Group when it is formed.</p> <p>It is imagined that the signs would recognise the significance of the Aboriginal Place and provide site access details.</p>	<b>Section 4.9.1</b>

Wiradjuri stakeholder management aim	Response	Where addressed in this Plan
The ongoing monitoring of the quarry site and important cultural sites by the RAPs is to occur at least 4 times a year, these roles will be remunerated by agreed contracts.	<p>E.B. Mawson &amp; Sons Pty Ltd will maintain any site demarcation fencing and signage.</p> <p>It will be the responsibility of the E.B. Mawson &amp; Sons Pty Ltd to monitor site buffers at boundary of the WRQ operational areas on a regular basis and not less than every two years.</p> <p>Photos from the northern, southern, eastern, and western perimeters of the approved quarry site boundary will be taken to provide evidence that quarrying activities are within the approved quarry curtilage. Monitoring will be undertaken by at least two representatives of the Koomaringa Management Group, where practicable.</p> <p>At other locations within the Koomaringa AP, the Koomaringa Management Group should explore funding options with HNSW, to organise monitoring of the Koomaringa AP on at least a two-yearly basis.</p>	<p><b>Section 4.9.1</b></p> <p><b>Section 4.6.4</b></p>
Feral animal "Eradication Programs" for feral pigs and goats need to be undertaken on an ongoing basis because these animals after wet weather are digging up the country, dispersing artefacts and destroying Wiradjuri sites.	<p>Feral animal control within the Koomaringa AP will be the responsibility of the Koomaringa Management Group who should explore funding options with HNSW to organise feral animal control. It is noted that this activity was also suggested by Mr Peter Ingram in his response to the Koomaringa AP Plan of Management.</p> <p>Table 3-1 of the Koomaringa AP Plan of Management allows poisoning of feral animals to proceed within the Koomaringa AP without further management.</p>	<p><b>Section 4.5</b></p> <p><b>Table 3-1</b></p>
Community and individual access to Wiradjuri Cultural Places Toolmaking Sites A, B and C at Koomaringa is to be allowed to continue into the future with appropriate times and dates agreed to by all parties.	<p>E.B. Mawson &amp; Sons Pty Ltd have agreed to facilitate access to the significant cultural heritage sites near the WRQ. This includes providing a car park and arranging access visits based on staff availability (for escorts) and operations at the WRQ (i.e. access being unsafe).</p> <p>Times and dates of site visits will need to be pre-arranged with the WRQ.</p>	<p><b>Section 4.9.2</b></p>
A proportion of the existing poor road up to Site B Toolmaking site needs to be further developed/graded which would allow vehicle access for Aboriginal Elders and other interested groups entering from the "Northern Access Gate"	<p>The decision to allow access to Site B will be taken by the Koomaringa Management Group who can decide on the location and form of any proposed access track.</p> <p>Until such times as the access track is installed, E.B. Mawson &amp; Sons Pty Ltd will assist with the transport of people to Site B when required.</p>	<p><b>Section 4.9.6</b></p>
A large "Car Park" and shelter area to be erected opposite Site A so that Wiradjuri Elders can undertake cultural training for our people as well as to non-Aboriginal people. Shelter should be large enough to accommodate at least 30 + people	<p>The WRQ ACHAR indicates the location for the car park (Figure 9-2).</p>	<p><b>Section 4.9.2</b></p>

Wiradjuri stakeholder management aim	Response	Where addressed in this Plan
with some seating areas. and a Car Park for at least 10 cars.	The location and form of the picnic shelter will be determined by the Koomaringa Management Group.  E.B. Mawson & Sons Pty Ltd have undertaken to provide reasonable funding to construct the shelter and a path connecting the shelter to the car park.	
Cultural Training and Awareness Programs to be delivered to all staff who work on or with Koomaringa and any other quarry sites in Wiradjuri country. This will be delivered by Bundyi Culture as per an agreed contract. This must take place urgently.	E.B. Mawson & Sons Pty Ltd agree to arranging a one-off face to face induction for WRQ staff. The content of this induction will then be presented as a training package for later use. Both the face to face induction and the provision of a training package will be under an agreed contractual arrangement.	<b>Section 3.6</b> The WRQ ACHAR includes Recommendation 3 that states: <i>E.B. Mawson &amp; Sons Pty Ltd will arrange a one-off face-to-face heritage induction for WRQ staff. The content of this induction will then be presented as a training package for later use. Both the face-to-face induction and the provision of a training package will be under an agreed contractual arrangement.</i>
A written commitment to erect further fencing to protect additional recently identified Northern Wiradjuri cultural areas.	The location and form of the any site fencing outside of the WRQ Quarry Site will be determined by the Koomaringa Management Group.  Fencing at Sites A, B, and C has been installed with the assistance of Wiradjuri stakeholders.	<b>Section 3.3</b> <b>Section 4.9.1</b>
Since Uncle Rob Carroll, Uncle James Ingram and myself have been out to Koomaringa and surveyed large areas, we are requesting that the exclusion zones for sites A, B and C be documented to AHIMS as we have extended those areas to try and cover as many special areas and Wiradjuri cultural items as possible.	Sites A, B, and C are currently registered with AHIMS, and as they are within the Koomaringa AP, their significance is recognised, and their current condition is protected.  Site C includes sites registered by OzArk as Koomaringa PL-01 (42-5-0023) and Koomaringa OS-11 (42-5-0020). In addition, Wiradjuri stakeholders have registered Koomaringa Grind Groove 1 MS (42-5-0062) with the fenced area for Site C.	Not specifically addressed as the sites are registered with AHIMS.

### 3.1.2 Stakeholder management aims

The following are aims for the management of the Koomaringa AP that have been incorporated within this Plan.

Wiradjuri stakeholders aim to:

- Promote long-term protection of the cultural value of each place
- Enable the Aboriginal community to manage the cultural values of the area that holds special significance for them
- Maintain cultural and recreational practices through informal or formal licence agreements
- Enable the Aboriginal community to discuss issues and reach agreements with landowners and managers about site protection
- Improve regulatory and management outcomes for the community



- Protect and promote Aboriginal cultural heritage.

HNSW aim to:

- Provide all declared Aboriginal Places with management plans
- Implement these management plans, using them to conserve and protect cultural values
- Uphold mutual respect between all stakeholders in the plan making process
- Assist in the future review of management plans.

Landowners and / or WRQ aim to:

- Ensure appropriate management of each place is undertaken
- Ensure their legal requirements are met
- Recognise the cultural values of the Aboriginal Place.

### 3.2 STATEMENTS OF MANAGEMENT

1. The cultural values of the landscapes, sites, and objects at the Koomaringa AP will be identified, conserved, recorded, and managed in accordance with their significance. Any Aboriginal sites and objects of Aboriginal cultural heritage discovered within the boundaries of the Aboriginal Place will be reported to HNSW (see section 89A of the NPW Act) and recorded in the AHIMS. The condition of known sites and objects will be monitored by the Koomaringa Management Group (**Section 3.3**)
2. Mapping of the Koomaringa AP site must reflect the registered curtilage of the Aboriginal Place, locations and extent of all tangible archaeological sites, and the boundary and extent of existing WRQ quarrying operations and activity. These layers must be present on all appropriate WRQ site plans and those areas where Aboriginal objects are located must be clearly delineated as no go zones
3. The risk of harming the Koomaringa AP must be minimised wherever possible. Any proposed invasive work that involves ground disturbance or the removal of mature vegetation will be considered on a case-by-case basis
4. Aboriginal knowledge gathered by HNSW will be respected and protected
5. All day-to-day and longer-term management decisions and the implementation of works and other activities should be made with reference to the Plan. No action should be taken if any adverse impact/s on the significance of the place will occur, without further consultation, assessment, and if required, an AHIP
6. Resolution of any conflicts regarding management and change should give priority to Aboriginal cultural values

7. The local Aboriginal community should continue to be encouraged to visit the Koomaringa AP to continue cultural and spiritual practices through informal or formal licence agreements with landowners or managers (where relevant). Permission of the landowner or manager to access and use the land should be obtained prior to activities occurring
8. HNSW and landowners will enable the Aboriginal community to determine the level of information on the Koomaringa AP that is to be made available, such as location, stories, and significance
9. The Koomaringa Management Group (**Section 3.3**) will take steps to mitigate the harm to the Koomaringa AP which may be caused by animals
10. Actions designed to ensure continuity of cultural practices should be encouraged, such as replanting bush foods, retaining vegetation of high cultural value, and integrating cultural and natural heritage during land use planning
11. Surface archaeological surveys that may be required should be undertaken by an archaeologist or Aboriginal Cultural Heritage Officer who is sensitive to Aboriginal issues and can work closely with the local Aboriginal community, and as set out in the *Code of practice for archaeological investigation of Aboriginal objects in NSW* (Code of Practice; DECCW 2010). Non-invasive acts carried out in accordance with this code, such as survey, do not require an AHIP. As set out in Requirement 14 of the Code of Practice, any invasive archaeological investigation such as subsurface testing would require an AHIP
12. Increase public awareness of the existence of the Koomaringa AP and its significance following the wishes of the Wiradjuri stakeholders
13. Traditional, contemporary, and post-contact stories, knowledge and management practices should influence ways in which the land is managed and used
14. Moveable objects of cultural significance will be conserved *in situ* wherever possible. If objects are moved, they should be moved in accordance with an AHIP, assessed for significance under the NPW Act, and professionally recorded, collected, and stored.

### 3.3 KOOMARINGA MANAGEMENT GROUP

It is recommended that a Koomaringa Management Group be established to facilitate the objectives of this Plan. Stakeholders should be invited to participate, including representatives from HNSW, Griffith LALC, the WRQ, and the Carrathool Shire Council, as well as two female Elders/representatives and two male Elders/representatives from the Wiradjuri stakeholders.

The composition and governance of the Koomaringa Management Group will be included in the terms of reference to be developed following the inception of the group (**Section 4.1**).

While the Wiradjuri stakeholders referred to in **Section 2.1** may be part of the Koomaringa Management Group, for heritage assessments and archaeological finds within the Koomaringa AP boundary, the Koomaringa Management Group should be the primary point of contact.

Any matters outside the scope of this Plan will be subject to discussion and negotiation of the Koomaringa Management Group. A 14 day notification will be sent the participants of the Koomaringa Management Group to arrange an online meeting to discuss and negotiate a solution and appropriate management for the out-of-scope heritage management issue.

The Koomaringa Management Group will meet at least every two years to assess the continued suitability of this Plan and to recommend any amendments to this Plan to ensure it remains 'fit-for-purpose'.

### 3.4 MANAGEMENT MEASURES

Management measures include initiatives, programs, and works that aim to prevent harm to Aboriginal objects and the Aboriginal Place. The management measures for the Koomaringa AP include:

E.B. Mawson & Sons Pty Ltd, as owners of the WRQ, will:

- Adhere to the conditions pertaining to Aboriginal cultural heritage in DA 2022/29 and any AHIP that may be issued
- Regularly consult and involve the Koomaringa Management Group in decisions associated with cultural heritage management within the WRQ and the Koomaringa AP more generally if required
- Undertake heritage inductions of all personnel permitted to work at the WRQ within the Koomaringa AP. E.B. Mawson & Sons Pty Ltd will arrange a one-off face-to-face heritage induction for WRQ staff provided by Wiradjuri stakeholders. The content of this induction will then be presented as a training package for later use
- Demarcate the extent of all Aboriginal sites with signage and other markers as required to prevent damage to sites by activities associated with the WRQ under the supervision of the Koomaringa Management Group and/or a qualified Aboriginal cultural heritage specialist
- Monitor the fenced site buffers of Sites A, B, and C on a regular basis and not less than every two years. Monitoring will be undertaken by at least two representatives of the Koomaringa Management Group, where practicable
- Take photos from the northern, southern, eastern, and western perimeters of the approved disturbance area not less than every two years to provide evidence that quarrying activities are within the approved disturbance curtilage. The photos will be made available to the Koomaringa Management Group
- Fund the installation of heritage signage at the WRQ. The location and wording of any signage will be discussed with the Koomaringa Management Group when it is formed. It

is imagined that the signs would recognise the significance of the Aboriginal Place and provide site access details

- Plant and maintain a tree screen of appropriate native species outside of the archaeological site buffer between Site A and the WRQ. This tree screen will help improve the visual amenity of Site A when looking towards the WRQ
- Assist with allowing safe access to the Koomaringa AP for the Aboriginal community. by locating and forming a gravelled carpark for visitor use
- Facilitate an appropriate access protocol to allow the Aboriginal community to visit the Koomaringa AP via the quarry operations dependent on appropriate notice and safety considerations
- Facilitate and fund the installation of a path, picnic shelter table and seats, and signage leading from the carpark to Site A. The location of these facilities will be on the advice of the Koomaringa Management Group when it is formed and HNSW
- Ensure that all operational plans and maps identify the locations of all Aboriginal sites to ensure they are avoided and not harmed during any development activities.

The Koomaringa Management Group, in consultation with the landowner, will undertake to:

- Adhere to privacy and confidentiality of culturally sensitive information
- Consult with HNSW officers regarding proposed works outside of the WRQ
- Manage fire risks
- Allow natural regeneration of vegetation to mitigate erosion without harm to Aboriginal objects
- Educate people on the significance of the place and safe practices
- Ensure that artefacts are not removed from the Koomaringa AP
- Routinely monitor and/or inspect sites for any harm to the Aboriginal Place
- At least every two years discuss the effectiveness of this Plan and recommend any amendments to ensure the Plan remains 'fit-for-purpose'.

### 3.5 FUTURE PROPOSED WORKS

Any proposed works for the Koomaringa AP which are not authorised by this Plan or approved in DA 2022/29 for the WRQ must be discussed with HNSW prior to commencement of the works to assess if an AHIP is required. An AHIP application will require undertaking additional cultural and heritage assessments. The conservation of sites in the landscape should be considered for all future works outside of the WRQ approval area.

Within the Koomaringa AP are a number of existing services such as an electricity transmission line maintained by Essential Energy, as well as buried services such as cables. These assets may require future maintenance, upgrade, or replacement at some time in the future. If the works



require ground disturbance, an AHIP will be required and all works must take place in consultation with the Koomaringa Management Group.

### 3.6 HERITAGE INDUCTIONS

All WRQ staff and contractors will be provided with and must acknowledge the location of any heritage objects or places in proximity to their work areas. The staff and contractors involved in the proposed work will be made aware of the legislative protection requirements for all Aboriginal and historic places and objects, as well as relevant processes for unanticipated finds or skeletal remains. E.B. Mawson & Sons Pty Ltd will arrange a one-off face-to-face heritage induction for WRQ staff provided by Wiradjuri stakeholders. The content of this induction will then be presented as a training package for later use.

### 3.7 LAND MANAGEMENT RISK ASSESSMENT

A range of activities occur across the Koomaringa AP. It is important that the risks associated with these activities are assessed to protect the Aboriginal values of the place.

**Table 3-2** provides a detailed list of activities and assesses the risk associated with each activity. This applies to all areas of the Koomaringa AP outside of the WRQ. Activities within the WRQ that may harm Aboriginal objects will be managed under DA 2022/29 and any approved AHIP conditions.

The management requirements of each activity have been rated depending on the likelihood that it would harm the cultural heritage values of the Koomaringa AP. Hazards have been colour-coded using a traffic light method:

- Green for low (L). Considered minor work which is unlikely to impact the values of the Place and requires no further consultation or assessment
- Orange for moderate (M). Considered work or activity that may have minor impacts on the values of the place. Works will require consultation with HNSW as a first point of contact. Depending on the individual circumstances of the work, HNSW may decide if further consultation with the Aboriginal community is needed prior to works starting. The consultation with HNSW could include providing written information and obtaining comment, direction, or advice in relation to the work. Comment from HNSW or the Aboriginal community would need to be received within 14 days of submission.
- Red for high (H). Considered to be major work that is likely to cause harm to the Koomaringa AP. This may require an AHIP and further assessment and community consultation.

**Table 3-2: Management requirements for activities in the Koomaringa AP and outside the WRQ.**

Management requirement	Actions	Potential risk level to values and significance	How will activity be managed
Weed management	Spraying	Low	Proceed with caution. Vehicles stay on marked tracks and ground surface is not disturbed
	Pulling	Moderate	Proceed with caution but limit ground disturbance
	Slashing	High	May require further investigation and possibly an AHIP. Consult with Koomaringa Management Group and/or HNSW
Native tree removal	Heavy machinery	High	May require further investigation and possibly an AHIP. Consult with Koomaringa Management Group and/or HNSW
Signage (hand)	Installation of public information signage	Low	Proceed with caution
Signage (machine)	Installation of public information signage	Moderate	Consultation with Koomaringa Management Group to avoid harm
Animal pest management	Poisoning	Low	Proceed with caution
Grazing/stock	Grazing	Low	Proceed with caution
Vehicle track maintenance (minor)	Existing vehicle access tracks (repairing potholes, minor vegetation clearance to allow passage)	Low	Proceed with caution
Vehicle track maintenance (major)	Existing vehicle access tracks (grading, upgrading)	High	All vehicle tracks within the Koomaringa AP have not been surveyed. Consultation with the Koomaringa Management Group must take place and may involve a site inspection.
Vehicle access	Access on marked tracks only and not to drive off marked tracks	Low – light vehicles only	Proceed with caution
		Moderate – heavy vehicles	Consultation with Koomaringa Management Group and/or HNSW to avoid harm
Vehicle track construction	Grading, formation of new tracks	High	May require further investigation and possibly an AHIP. Consult with Koomaringa Management Group and/or HNSW
Existing fencing maintenance	Restraining, repair	Low	Proceed with caution
New fence construction	Installation of posts, stays, and gates	Moderate	Consultation with Koomaringa Management Group to avoid harm
Construction or erection of permanent structures, buildings, or facilities	Ground excavation for footings, levelling, contour formation, etc. outside the WRQ	High	Would require further investigation and an AHIP. Consult with Koomaringa Management Group and/or HNSW
Maintenance of existing services without ground disturbance or harm to mature trees	Maintenance of the existing Essential Energy easement including lower strata vegetation clearance and pest control. Ground disturbance within 2 m of existing structures is permissible.	Low	Proceed with caution
Upgrade or replacement of existing services that require ground disturbance or harm to mature trees	Upgrade or replacement of services that require ground disturbance outside of an existing services trench or further	High	Activities outside of the WRQ would require further investigation and an AHIP. Consult with Koomaringa Management Group and/or HNSW

Management requirement	Actions	Potential risk level to values and significance	How will activity be managed
	than 2 m of existing electricity structures.		
Ground disturbance and removal of soil	Excavation, quarrying, mining outside the WRQ	High	Activities outside of the WRQ would require further investigation and an AHIP. Consult with Koomaringa Management Group and/or HNSW
Erosion and sediment control	Ground disturbance, earthworks, sediment sumps	High	Would require further investigation and possibly an AHIP. Consult with Koomaringa Management Group and/or HNSW
Fire suppression	Emergency	Exempt	Exempt but recommend proceed with caution in areas where recorded Aboriginal sites occur.
Hazard reduction	Small, controlled fire	High	Cannot occur without further investigation, consultation with HNSW, and possibly an AHIP
Archaeological excavation	Aboriginal heritage excavations	High	Cannot occur without consultation with HNSW and the Koomaringa Management Group. Would require an AHIP.

### 3.8 CULTURAL ACTIVITY RISK ASSESSMENT

A preliminary list of cultural activities that the community may wish to undertake at the Koomaringa AP are outlined in **Table 3-3** using the same traffic light colour coding system as **Table 3-1**. This list may be amended or changed by the Koomaringa Management Group.

See **Section 4.9.4** for details about accessing the Koomaringa AP for cultural purposes as areas within the WRQ and closely adjacent areas require approval from the WRQ to allow safe access.

**Table 3-3: List of cultural activities with a management requirement.**

Community activity	Potential risk level to values and significance	How will activity be managed
Cultural burning	High	Cannot occur without consultation with the Koomaringa Management Group and HNSW. May require an AHIP
Camping	Low	Exempt
Collection of bush medicine	Low	Exempt
Knapping stone	High	Cannot occur without consultation with the Koomaringa Management Group and HNSW
Education (non-commercial and commercial)	Moderate	Cannot occur without consultation with the Koomaringa Management Group and HNSW. A licence is required from the Koomaringa Management Group for all commercial activities
Cooking	Low	Exempt
Cultural dancing	Low	Exempt
Food and plant resource collection	Low	Exempt

### 3.9 CULTURAL VALUE MANAGEMENT STATEMENT

The cultural significance of the Koomaringa AP is recognised, especially through the different cultural values overall for the Aboriginal Place. **Table 3-4** outlines specific value statements of varying aspects of the Koomaringa AP, and specific cultural value management statements.



**Table 3-4: Specific value statements for the Koomaringa AP.**

Cultural value or special significance	Specific cultural value management statements
Areas associated with meetings, camping, and ceremonial grounds	<ul style="list-style-type: none"> <li>▪ The Koomaringa Management Group will handle culturally sensitive information with respect and according to the wishes of the wider Aboriginal community regarding the Koomaringa AP which contain traditional significance</li> <li>▪ The Koomaringa Management Group, other relevant stakeholders, and the wider Aboriginal community will work to conserve the cultural values of the place</li> <li>▪ Continuing access for Aboriginal people to the Koomaringa AP will be encouraged to conserve its significance</li> <li>▪ The development of infrastructure outside that approved for the WRQ will only be undertaken under the authorisation of an AHIP unless it will not result in harm to Aboriginal objects or the place or is exempt under the NPW Act</li> <li>▪ Continued access to traditional and contemporary resources (example: food or plants) which are important for cultural purposes such as ceremonies or simply in their own right, will be permitted</li> <li>▪ Any extraction of food or material resources will be undertaken in an environmentally sustainable manner</li> <li>▪ The Koomaringa Management Group and other relevant stakeholders are encouraged to allow ceremonies to be reintroduced to places where they were traditionally performed</li> </ul>
Areas associated with intergenerational teaching, to pass on knowledge to young people	<ul style="list-style-type: none"> <li>▪ The Koomaringa Management Group and other relevant stakeholders will be encouraged to respect the connection of Aboriginal people to culturally significant places and the need for the connection to Country to allow for the passing on of traditional knowledge</li> <li>▪ The Koomaringa Management Group and other relevant stakeholders will be encouraged to permit Aboriginal people to access and continue to use the Koomaringa AP</li> <li>▪ The ongoing role of the Koomaringa AP as a teaching site will be recognised and respected</li> <li>▪ Culturally sensitive information will be handled with respect according to the wishes of the Aboriginal community.</li> </ul>
Areas with landforms associated with stories, rituals, or spiritual values	<ul style="list-style-type: none"> <li>▪ The Koomaringa Management Group and other relevant stakeholders will work together to utilise this Plan to conserve and protect the cultural values of the Koomaringa AP</li> <li>▪ The Koomaringa Management Group and other relevant stakeholders will strive to conserve the spiritual values of the place through this Plan to conserve and protect the environmental and cultural values at the Koomaringa AP</li> <li>▪ The Koomaringa Management Group and other relevant stakeholders will recognise the ongoing role of the Koomaringa AP as meeting places and the significance of the places in stories</li> <li>▪ Continuing access for Aboriginal people to the Koomaringa AP will be encouraged to conserve its special significance</li> <li>▪ The Koomaringa Management Group and other relevant stakeholders will work to prevent large scale landscape changes at the Koomaringa AP to conserve the ritual and spiritual values of the landform</li> <li>▪ The erection of fences to protect the Koomaringa AP will be encouraged where appropriate</li> <li>▪ The Koomaringa Management Group and other relevant stakeholders will handle culturally sensitive information with respect and according to the customs of the Aboriginal community regarding each place</li> <li>▪ The development of infrastructure will only be undertaken under an AHIP unless it will not result in harm to Aboriginal objects or the wider values of the Koomaringa AP or is exempted under the NPW Act</li> <li>▪ The Koomaringa Management Group and other relevant stakeholders should keep the natural surrounds as they are (e.g. water flows), especially if they contribute to the cultural significance of the Koomaringa AP</li> </ul>
Places that include rare or significant Aboriginal objects including traditional quarry and manufacturing sites	<ul style="list-style-type: none"> <li>▪ Rare or significant collections of Aboriginal objects should remain undisturbed</li> <li>▪ Further and continued research into places containing Aboriginal objects will be encouraged, unless such objects are on burials or ceremonial sites</li> <li>▪ Culturally sensitive information will be handled with respect, and according to the wishes of the Aboriginal community</li> <li>▪ Trees will only be removed following a site assessment. Work will be monitored while it is being undertaken and once completed, to ensure it meets the requirements of an AHIP and any other legal requirements. Clearance of vegetation within the WRQ will follow the approved development consent</li> </ul>

Cultural value or special significance	Specific cultural value management statements
	<ul style="list-style-type: none"><li>▪ Visitors to the Koomaringa AP will be encouraged to show respect for and cultural sensitivity to Aboriginal objects by not physically touching or removing them</li><li>▪ Objects will only be removed by HNSW or by a person working for HNSW to conserve or protect an Aboriginal object or place or Aboriginal people carrying out traditional cultural activities, except commercial activities</li><li>▪ Any new roads or pathways within the Koomaringa AP will be designed to conserve Aboriginal objects and sites in the landscape.</li></ul>

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## 4 HERITAGE MANAGEMENT MEASURES

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### 4.1 MATTERS FOR NEGOTIATION

To guide the management at the Koomaringa AP, terms of reference will be developed between the members of the Koomaringa Management Group.

The terms of reference can include any number of agreements; however, it is recommended that the terms of reference should include:

1. That the Koomaringa Management Group is responsible for contact and communications between the landowners, the WRQ, and the Aboriginal community
2. A strategy for how this communication will take place
3. A set of roles and responsibilities between the landowners, the WRQ, and the Aboriginal community
4. A guide to dispute resolution between the landowners, the WRQ, and the Aboriginal community
5. A future strategy to bestow the management of the Koomaringa AP to the Aboriginal community where possible
6. Visitation protocols: access agreements; licence agreements; and insurance responsibilities etc.
7. Review and amendment of this Plan to ensure it remains 'fit-for-purpose'.

A representative from HNSW will be informed of all management discussions.

### 4.2 TREATMENT OF CULTURALLY SENSITIVE INFORMATION

Sensitive information collated for the management of the Koomaringa AP should not be disclosed if there is a risk of damage, or loss of the items or sites. Information provided to HNSW that is culturally sensitive must be kept confidential as appropriate. This will be left to the discretion of the Koomaringa Management Group. Consideration of cultural sensitivities will also be considered when any signage is planned within the Koomaringa AP (**Section 4.9.1**).

Some information may be kept confidential to protect culturally sensitive information in accordance with a Section 161 notice under the NPW Act. Culturally sensitive information will be respected and managed in accordance with the NPW Act.

### 4.3 MANAGEMENT PRIORITIES

The priority of this Plan is to protect the values of the Koomaringa AP. As the most immediate risk of harm to the Koomaringa AP is from the operation of the WRQ, the most immediate



management issues for the Koomaringa AP are those associated with mitigating the risk of harm from the WRQ (Management Zone 1, **Section 4.4**):

- Mapping used at the WRQ must reflect the registered curtilage of the Aboriginal Place, locations and extent of all tangible archaeological sites, and the boundary and extent of the approved WRQ (as per **Figure 1-2**). To protect Aboriginal sites from inadvertent harm from the WRQ, this information must be present on all applicable WRQ site plans and those areas where Aboriginal objects are known must be clearly delineated as no go zones.
- Salvage collection of 42-5-0012 (Koomaringa IF-03) and 42-5-0022 (Koomaringa OS-13) that are within the approved disturbance area for the WRQ will be carried out as per the conditions for the WRQ (DA 2022/29) and under the authority of an approved AHIP.
  - It is the responsibility of WRQ to organise a suitably qualified archaeologist and Wiradjuri stakeholders to undertake salvage under the authority of an approved AHIP.
  - It is the responsibility of WRQ to fence these sites until an approved AHIP is in place.
- Relocation of a basalt boulder described as an 'anvil', 42-5-0064 (Koomaringa Anvil 1), that is within the approved disturbance area for the WRQ will be carried out as per the conditions for the WRQ (DA 2022/29) and under the authority of an approved AHIP.
  - It is the responsibility of WRQ to organise a suitably qualified archaeologist and Wiradjuri stakeholders to undertake the relocation under the authority of an approved AHIP.
  - It is the responsibility of WRQ to fence this site until an approved AHIP is in place.
- Maintaining the recently installed fencing between site 42-5-0004 (Site A, B, and C) and the WRQ operations. The buffer must be periodically monitored not more than every two years (**Section 4.9.1**) to ensure that the demarcation remains clear.
  - The WRQ engaged Wiradjuri stakeholders to assist in the correct placement of the demarcation in late 2023.
- Site signage at 19 known sites that are currently outside of fencing (Koomaringa OS-01, OS-02, OS-3, OS-05, OS-06, OS-07, OS-8, OS-09, OS-10, PL-02, ST-01, Koomaringa Hearth 1, Koomaringa PAD 2 MS, Koomaringa PAD 1 MS, Koomaringa Large White Core 1, Koomaringa Anvil 22.12.23, Koomaringa Scar Tree 21.12.23, Koomaringa PAD Site 21.12.23, and Koomaringa Large Core Stone 1) (**Figure 1-4**) will be installed. The buffer should be periodically monitored (**Section 4.8.1**) to ensure that the demarcation remains clear.
  - It is the responsibility of WRQ to organise a suitably qualified archaeologist and Wiradjuri stakeholders to establish the signage.
- Appropriate management of Aboriginal sites if ground disturbing impacts are planned in the future that extend beyond the WRQ approved disturbance area.

- It is the responsibility of any proponent of ground disturbing activity not approved in the WRQ development approval, to engage a suitably qualified archaeologist and representatives of the Koomaringa Management Group to inform whether further archaeological assessment is required. Generally, any activity including ground disturbance or vegetation clearing within the AP will require an AHIP.
- Ongoing management of the sites, including monitoring and record keeping, to ensure sites are not harmed by ongoing activities or works at the WRQ. This will form part of development consent condition for DA 2022/29.
  - It is the responsibility of WRQ to liaise with the Koomaringa Management Group to determine a suitable protocol.
- Review of any future upgrade or replacement of existing services within the Koomaringa AP (outside of the WRQ) to ensure that Aboriginal cultural heritage is conserved and that activities involving ground disturbance in undisturbed areas or harm to mature vegetation is appropriately managed under an AHIP.

#### 4.4 HERITAGE MANAGEMENT ZONES

Any activity that is considered a high-risk activity (as per **Table 3-2**) triggers the requirement for further investigation and the possible need of an AHIP. Any potential harm to known Aboriginal objects also triggers the requirement for an AHIP.

Zone 1 (**Figure 4-1**) shows those areas previously surveyed including all previously recorded Aboriginal objects known within the Koomaringa AP at the commencement of this Plan. The results of this survey are reported in OzArk 2024. The Aboriginal objects within Zone 1 are subject to protections as per the NPW Act.

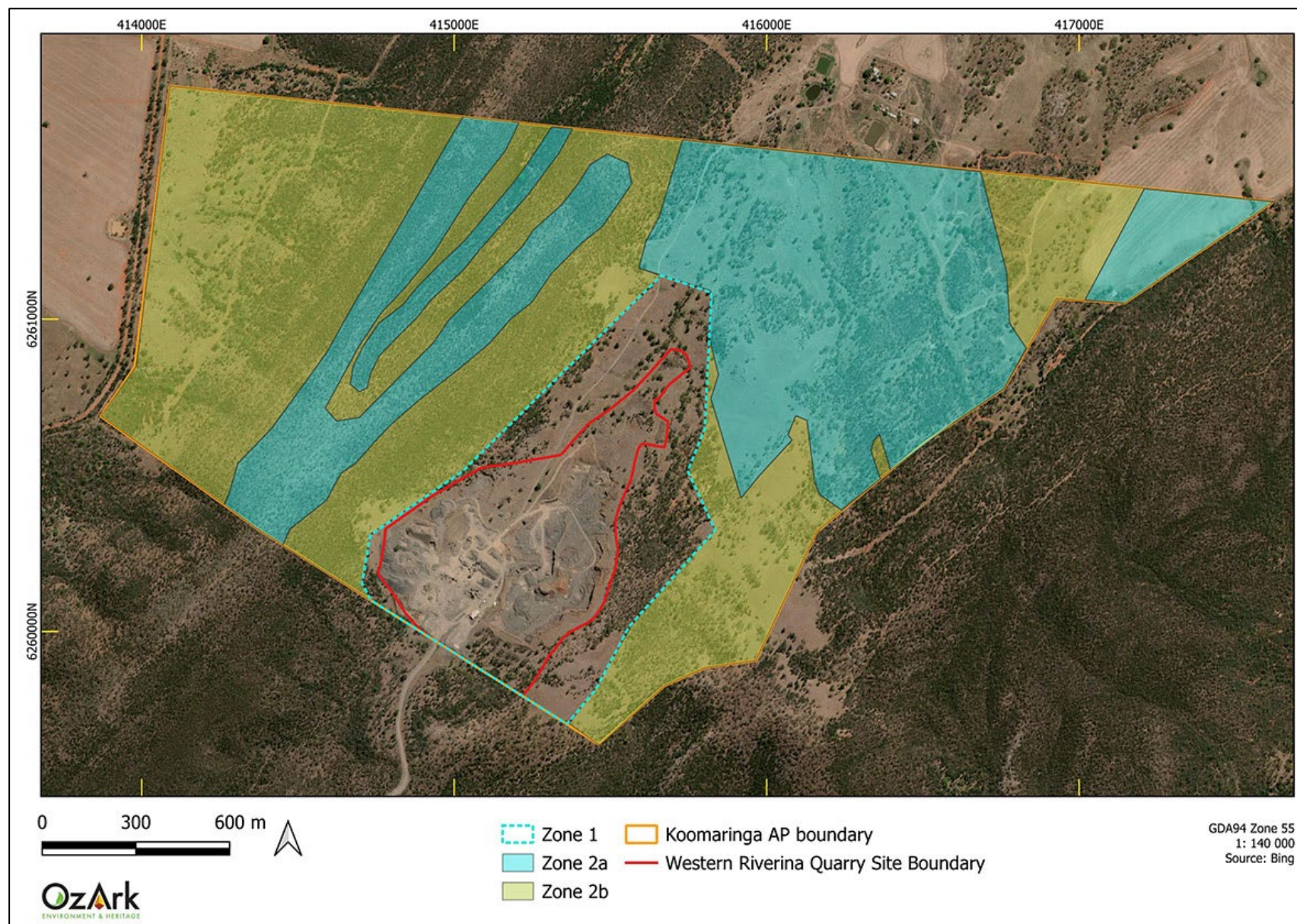
- If harm to an AHIMS site is necessary/unavoidable, then the procedures outlined in **Section 4.5** must be followed
- If during works within Zone 1, human skeletal remains are identified, then the procedures outlined in **Section 4.8.1** must be followed
- If during works within the Zone 1, a suspected Aboriginal object is identified, then the procedures outlined in **Section 4.8.2** must be followed.

Zone 2 (**Figure 4-1**) are those areas which have not been previously assessed and require further archaeological assessment to be undertaken prior to any ground-disturbing works. The two categorisations of area encompassed within Zone 2 include:

- Zone 2a – high potential unsurveyed areas
  - These areas include flats or gentle slopes adjacent to drainage lines and the ridgeline of Scrubby Ridge. These landforms are considered to have higher archaeological potential.
- Zone 2b – general unsurveyed areas
  - These areas include the remaining area of Zone 2 which has not undergone survey previously. Although archaeological potential is still present, the potential is lower than Zone 2a.



Figure 4-1: Heritage management zones within the Koomaringa AP.





## 4.5 ACTIVITIES THAT MAY HARM THE KOOMARINGA AP

Harm to an Aboriginal object or place is defined in the NPW Act to include any act or omission that destroys, defaces, or damages an Aboriginal object or Place or causes or permits the object or Place to be destroyed, defaced, or damaged. Harm to an Aboriginal Place is an offence under the NPW Act unless the harm was authorised by an AHIP.

Situations that may constitute harm at the Koomaringa AP include:

- Most major landscape changes to the Koomaringa AP such as clearing, quarrying (excluding the approved extent of the WRQ), mineral exploration, rabbit warren ripping, grading, and other earthworks
- Upgrade or replacement of existing services within the Koomaringa AP but outside of the WRQ
- Moving or collecting Aboriginal objects
- Destroying or damaging native vegetation including traditional medicine and food
- Overuse and exploitation of natural resources
- Human interference (vandalism, pilfering)
- Major infrastructure developments (installing permanent infrastructure such as new roads or buildings)
- Fire including cultural burning
- The modification of landscapes including views and settings.

In addition, harm could occur to the values of the Aboriginal Place through inaction or neglect such as:

- Dilapidation of fences
- Erosion
- Poor signage
- Pest weeds
- Pest animals
- Maintenance, management, and identification of designated access roads to and from the WRQ
- Refuse/illegal rubbish dumping.

### 4.5.1 Exemptions to harm

The exemptions to the liability offence of harming an Aboriginal Place include when the relevant activity:

- Relates to Aboriginal people carrying out traditional cultural activities (except for commercial activities) – Section 87B of the NPW Act
- Is required to conserve or protect an Aboriginal object or place and was carried out by an authorised officer or a person under the direction of that officer, or another authorised person – Section 87A of the NPW Act.
- Is any emergency fire-fighting act or bush fire hazard reduction work (planned hazard reduction work should consider impacts on Aboriginal heritage sites via the hazard reduction certificate) within the meaning of the *Rural Fires Act 1997* that is authorised or required to be carried out under that Act (Section 87A(b) of the NPW Act)
- Is an activity that will not harm Aboriginal objects approved in DA 2022/29 for the WRQ or an activity approved by an appropriate permit.

## 4.6 MANAGING HARM TO KNOWN ABORIGINAL OBJECTS

If measures contained within this Plan are implemented, then no previously recorded Aboriginal objects (i.e., those currently registered on AHIMS) will be harmed.

If harm to an Aboriginal object is unavoidable, then an AHIP application must be made to HNSW. Integral to an AHIP application is the preparation of an ACHAR and the requirement to follow the *Aboriginal cultural heritage consultation requirements for proponents 2010* (ACHCRs). The NPW Act is complemented by the Code of Practice that sets out the requirements for archaeological investigation in NSW where an application for an AHIP is likely to be made.

### 4.6.1 ACHA assessment

Pursuant to Section 86(4) of the NPW Act, protections extend to all areas within the curtilage of the Koomaringa AP. Provisions of the NPW Act mandate that an AHIP must be sought for any development proposed in the vicinity of an Aboriginal Place that may harm Aboriginal objects. As such, an Aboriginal Cultural Heritage Assessment (ACHA) will be required to support an AHIP application.

The ACHA will follow the Code of Practice and involve a field survey of the proposed development area. The field inspection will follow the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales* (The Guide, OEH 2011). This includes consultation with the Koomaringa Management Group in the first instance and in accordance with the ACHCRs if an AHIP application is likely.

If any ground disturbing works are proposed within Zone 2 that has not been previously assessed, an ACHA of the development area(s) will be required.

### 4.6.2 Archaeological salvage

No Aboriginal object will be moved, collected, or salvaged unless an AHIP has been obtained. The ACHAR and AHIP for any Aboriginal objects under threat of harm will detail any management

measures specific to the potential salvage of those objects with reference to the likely impacts. Salvage may include the collection of surface artefacts to remove them from harm, or the subsurface excavation of archaeological deposits.

Salvage collection or salvage excavation would be undertaken in accordance with a prescribed salvage methodology implemented by a qualified archaeologist in consultation with the Wiradjuri stakeholders.

Should any artefacts be recovered during any salvage collection or salvage excavation within the Koomaringa AP, the artefacts must be reburied or placed within the Koomaringa AP. The location chosen for relocation will be an area where future developments will not occur and as close as possible to their original locations and preferably inside the site extent of Site A or Site B. A site card will be submitted to AHIMS to record the relocation positions and an Aboriginal Site Impact Recording Form (ASIRF) will be submitted by the archaeologist detailing the salvage process and results of the sites.

#### **4.6.3 Archaeological testing**

If impacts are proposed to those areas of PAD associated with the known artefact scatters Koomaringa OS-02, OS-04, OS-05, OS-07, OS-08, OS-10, Koomaringa PAD 1 MS, and Koomaringa PAD 2 MS or areas or PAD identified in future, archaeological test excavation must be undertaken. Testing would be undertaken in accordance with Code of Practice and will require an AHIP. For any sites excavated and/or collected, an ASIRF for each site is required. If the sites are to be impacted following the test excavations a subsequent AHIP for harm will be required.

#### **4.6.4 Monitoring of sites within the Koomaringa AP**

It will be the responsibility of the WRQ monitor site buffers at boundary of the WRQ operational areas on a regular basis and not less than every two years. Monitoring will confirm that the prescribed site buffers detailed in **Section 4.3** are being maintained, and that site demarcation and signage are in place and in a good state of repair. Photos from the northern, southern, eastern, and western perimeters of the approved quarry site boundary should be taken to provide evidence that quarrying activities are within the approved disturbance curtilage. Monitoring will be undertaken by at least two representatives of the Koomaringa Management Group.

At other locations within the Koomaringa AP, the Koomaringa Management Group should explore funding options with HNSW, to organise monitoring of the Koomaringa AP on at least a two-yearly basis.

Any monitoring program near WRQ operational areas by the Koomaringa Management Group will require notifying the WRQ to ensure that the monitoring can be safely undertaken.

## 4.7 MANAGING HARM TO SIGNIFICANT HISTORIC HERITAGE

If harm to a significant historic item or place is unavoidable, then a statement of heritage impact (SOHI) will be prepared. The SOHI may include an archaeological assessment if it is considered that significant archaeological deposits may be harmed. If the SOHI or archaeological assessment determines that harm to significant heritage values may occur, then written approval from the Carrathool Shire Council may be required (if the item or place is assessed as having local heritage values) under Section 5.10 of the Carrathool LEP 2012.

If there is reasonable cause to suspect that the disturbance or excavation will or is likely to result in an item of local or state heritage significance being discovered, exposed, moved, damaged, or destroyed, then an excavation permit from HNSW may be required under section 139 of the Heritage Act.

## 4.8 MANAGING HARM TO UNKNOWN HERITAGE

The following measures are relevant to all development within the Koomaringa AP, whether in Zone 1 (previously surveyed areas) or Zone 2 (previously unsurveyed areas) (**Figure 4-1**).

### 4.8.1 Potential skeletal remains

If human/possible human skeletal material is exposed within the Koomaringa AP, it will be managed in accordance with legal requirements, and if it is Aboriginal ancestral remains, the wishes of the Wiradjuri stakeholders and/or the Koomaringa Management Group, as well as any direction from HNSW. Should human/possible human skeletal material (single bones or an intact burial) be located within any area, it will be managed in accordance with the following procedures:

1. Work in the immediate vicinity of the skeletal material will cease to ensure no further impact occurs
2. If there is substantial doubt as to human origin, the skeletal material will be inspected to determine if it is human or animal. If necessary, advice will be sought from a suitably qualified specialist
3. If the skeletal material is human or is thought to be human, NSW Police and HNSW must be notified immediately to enable definitive identification
4. If the remains are part of a potential crime or misadventure scene, then the NSW Police and NSW Coroner will take responsibility for the subsequent process
5. If the remains are those of a traditional Aboriginal ancestor, then Wiradjuri stakeholders and/or the Koomaringa Management Group and HNSW will dictate the appropriate course of action.
6. No further work or activity can occur within the area without the written approval of HNSW.



#### 4.8.2 Newly identified heritage items

Further Aboriginal objects or historic heritage items may be recorded within the Koomaringa AP but outside of the approved development footprint for the WRQ. Environmental factors, such as changes in ground surface visibility, may mean that heritage items have been revealed since previous heritage surveys. Any new discoveries of Aboriginal objects within the WRQ will be managed as per the development consent for DA 2022/29.

If what is believed to be an Aboriginal or historic site/object is discovered during authorised works within the Koomaringa AP, the following steps will be adhered to:

1. All work close to the discovery will cease and an area of 5 m around the location will be fenced with temporary high-visibility construction fencing
2. Advice will first be sought from a qualified archaeologist and the Wiradjuri stakeholders (if practical) to determine whether the find constitutes an Aboriginal object, or a historic item of heritage significance
3. If the object is confirmed as Aboriginal or likely to possess historic heritage significance, then the archaeologist, (in consultation with the Koomaringa Management Group if the find is an Aboriginal object), will determine the significance and best management of the find
4. No works will re-commence within the stop work zone until the find has been appropriately assessed
5. If the find is determined to be an Aboriginal object, then every consideration must be made to conserve the object in the landscape including the amendment of design plans
6. If harm to an Aboriginal object is unavoidable then further investigation, including undertaking the ACHCRs, developing an ACHAR and applying for an AHIP will be required (see **Section 4.5**)
7. If harm to a significant historic item is unavoidable then further investigation, including the preparation of a statement of heritage impact will be required (see **Section 4.7**)
8. Wiradjuri stakeholders will be informed of any newly discovered Aboriginal objects and the objects will be registered on the AHIMS database as required under the NPW Act
9. HNSW will be informed of any newly discovered significant historic items under Section 146 of the Heritage Act.

#### 4.9 SPECIFIC MANAGEMENT MEASURES TO MITIGATE RISK TO KNOWN HERITAGE SITES

This section of the Plan outlines the specific management measures to mitigate risks land management (**Section 3.7**) and cultural risks (**Section 3.8**) in relation to known heritage sites.

#### 4.9.1 Site demarcation and signage

Where appropriate, site demarcation will be implemented as a measure to protect and manage Aboriginal cultural sites, and if discovered, significant historic heritage items and places. The alignment of the demarcation at any individual site will be recorded and records stored in association with this Plan. Any signage must consider any cultural sensitivities around the information provided and the risk of identifying of heritage sites (**Section 4.2**).

Sites A, B, and C have been fenced with the assistance of the Wiradjuri stakeholders in late 2023. This fencing will be maintained and will be marked as a no-go area on all appropriate WRQ plans. WRQ will monitor the fencing not less than every two years to ensure it remains fit-for-purpose.

Based on the recommendations of OzArk 2024, DA 2022/29 conditions that the following site demarcations will be undertaken by the WRQ:

- There are 31 sites located outside the approved disturbance area at the WRQ and outside of existing fencing (Koomaringa OS-01, OS-02, OS-3, OS-05, OS-06, OS-07, OS-8, OS-09, OS-10, PL-02, ST-01, Koomaringa Hearth 1, Koomaringa PAD 2 MS, Koomaringa PAD 1 MS, Koomaringa Large White Core 1, Koomaringa Anvil 22.12.23, Koomaringa Scar Tree 21.12.23, Koomaringa PAD Site 21.12.23, and Koomaringa Large Core Stone 1). To protect these sites from any inadvertent impacts during the life of the WRQ, it is recommended that two-star pickets with a sign attached between them be installed at each site facing the most obvious direction of travel from the quarry area. The sign should identify the area as an 'environmental area' and provide advice not to disturb the area and a contact number of a responsible person at the quarry to contact for further information. The ongoing condition of this signage will be part of the monitoring program undertaken by the WRQ (**Section 4.6.4**).

Individual site demarcation beyond those specified above will be considered on a case-by case basis with the desired outcome being the long-term preservation of the site. Should fencing be required at sites that may be identified as being at high risk of harm (for example, sites near vehicle tracks), it will consist of sturdy, stock-proof, permanent fencing. Where there is doubt over the extent of surface artefacts a competent person will be involved in an inspection to identify the extent of visible Aboriginal objects (usually stone artefacts) on the surface.

#### 4.9.2 Visitor facilities

To assist with allowing safe access to the Koomaringa AP for the Aboriginal community, E.B. Mawson & Sons Pty Ltd will locate and form a gravelled carpark for visitor use within the WRQ.

E.B. Mawson & Sons Pty Ltd will also fund the installation of a path, picnic shelter table and seats, and signage leading from the carpark to Site A. The location of these facilities will be on the advice of the Koomaringa Management Group.

#### 4.9.3 Erosion control

Erosion and sediment control will be undertaken in a manner that avoids disturbance to known Aboriginal objects unless an AHIP is first obtained.

If works are required within a known Aboriginal cultural heritage site, the site should be inspected by a suitably qualified archaeologist and/or Wiradjuri stakeholders to advise on whether the proposed works are likely to harm Aboriginal objects. If harm is possible, an AHIP will be required to complete the works.

Should erosion control take place near a known Aboriginal site outside of approved extraction area at the WRQ, the following principles will be followed:

- Potential interactions between the remediation works and the cultural heritage sites will be managed. The potential for harm to Aboriginal cultural heritage objects should be assessed by a suitably qualified archaeologist and/or Wiradjuri stakeholders
- Natural regeneration of vegetation in an area will be encouraged to return it to as near as possible its original form
- Soft engineering solutions such as the placing of hay bales or coir logs on the surface will be preferably implemented to minimise disturbance to the site.

#### 4.9.4 Blasting impacts

Blasting operations at WRQ have been carried out since extraction operations commenced in 1987. The WRQ has developed a blasting method suited to the conditions at the quarry. The existing blast schedule includes blasting at approximately bimonthly intervals; however, these intervals can be more frequent during periods of high product demand.

Overpressure and vibration levels from blasting are assessable against criteria proposed by the Australian and New Zealand Environment and Conservation Council (ANZECC) in their publication *“Technical Basis for Guidelines to Minimise Annoyance due to Blasting Overpressure and Ground Vibration – September 1990”*.

The noise and vibration impact assessment undertaken for the WRQ predicted air blast overpressure and ground vibration levels would satisfy all ANZEC overpressure and vibration criteria at surrounding residences. The site inspection by OzArk Principal Archaeologist, Ben Churcher, on 11 August 2023, demonstrated that there is no evidence of blasting impacts on Site A and Site B from blasting associated with the current operations.

Notwithstanding, the drill and blast contractor would be required to monitor each blast in accordance with existing practices. If the criteria are exceeded, a further visual inspection would be undertaken of Site A and Site B to ensure there are no adverse impacts to Aboriginal cultural heritage values.

It is assessed that it is very unlikely that blasting associated with the operation of the WRQ will detrimentally impact the rock slabs containing quarrying activities at Site A and Site B.

#### 4.9.5 Visual amenity

To improve the visual amenity of Site A, E.B. Mawson & Sons Pty Ltd will plant and maintain a tree screen of appropriate native species outside of the archaeological site buffer between Site A and the WRQ. This tree screen will help improve the visual amenity of Site A when looking towards the WRQ. The most appropriate tree species would be the following:

- Kurrajong (*Brachychiton populneus*)
- Black Cypress-pine (*Callitris endlicheri*)
- White Cypress-pine (*Callitris glaucophylla*)
- Dwyer's Red Gum (*Eucalyptus dwyeri*)
- Poplar Box (*Eucalyptus populnea*).

Most of these species have some traditional use by Aboriginal people, e.g. for food (particularly Kurrajong), tools, or resin to make glues etc. The addition of a local wattle like *Acacia deanei* will provide a good year-round source of seeds for native animal food.

#### 4.9.6 Public / Aboriginal community access

Permission to access the Koomaringa AP must be sought in writing from the Koomaringa Management Group.

This excludes access to the WRQ, which will be subject to the workplace health and safety policies and access requirements of the WRQ. Access to areas near the WRQ needs to be approved by the WRQ as there could be hazards such as blasting that may limit safe access.

To assist with allowing safe access to the Koomaringa AP for the Aboriginal community, E.B. Mawson & Sons Pty Ltd agrees to facilitate the following access protocol:

- At least two business days prior to site visit:
  - Call the Quarry Manager to arrange a suitable time to access site
  - Provide contact details so the Quarry Manager can touch base if site activities or conditions change.
- Day of site visit:
  - Meet the Quarry Manager or delegate at the designated time at the site entrance on Munros Road
  - The Quarry Manager or delegate will provide escort to the designated parking area



- The Quarry Manager or delegate will provide escort whilst on site to ensure the safety of visitor
- At conclusion of the visit the Quarry Manager or delegate will provide escort back to the site entrance.

The decision to allow access to Site B will be taken by the Koomaringa Management Group who can decide on the location and form of any proposed access track. Until such times as the access track is installed, E.B. Mawson & Sons Pty Ltd will assist with the transport of people to Site B when required.

Access for members of the Wiradjuri stakeholders and the Koomaringa Management Group to the WRQ quarry site to implement site buffer zones (**Section 4.9.1**), and for any future monitoring of the known Aboriginal objects, will be organised with the WRQ.

#### 4.9.7 Infrastructure

An ACHA assessment in accordance with **Section 4.6.1** will be required for any additional proposed infrastructure within the Koomaringa AP that is not covered under the WRQ development approval (DA 2022/29) or permitted under Clause 2 'permitted without consent' for primary production as per the Carrathool LEP 2012. This also includes upgrade or replacement of existing services such as the Essential Energy electricity easement within the Koomaringa AP, but outside the WRQ. Given the significance of the Koomaringa AP, any development within the Koomaringa AP does not override the NPW Act.

Regardless of whether consent is required, infrastructure must attempt avoid any known Aboriginal objects and their designated buffer zones. A 14 day notification will be sent the participants of the Koomaringa Management Group of any proposed infrastructure outside of the approved area for the WRQ.

Infrastructure associated with the WRQ must accord with the recommendations put forward in the Ozark (2024) ACHAR for those areas within the WRQ curtilage (see **Section 4.5** for specifics) and any AHIP that may be issued. If quarry infrastructure is proposed outside the WRQ curtilage, then further ACHA assessment will be required as per **Section 4.6.1**.

#### 4.9.8 Fire management

If clearing of excess fuel load is required near known sites, it will be undertaken in a manner that minimises ground disturbance. Preferred methods of hazard reduction include manual brush cutting to avoid impacting surface Aboriginal stone artefacts. Tractor slashing should be avoided within the Koomaringa AP unless approved by the Koomaringa Management Group.

Maps showing all known Aboriginal objects should be made available to the Rural Fire Service so that objects, and particularly scarred trees, can be avoided as much as is reasonable if it is necessary to create fire breaks. Any damage resulting from fire management or bushfire

emergencies will be rehabilitated as soon as possible. If harm from such events causes damage to any Aboriginal objects, rehabilitation must be devised in consultation with the Koomaringa Management Group.

#### **4.9.9 Interpretation strategy**

The location of the Koomaringa AP does not lend itself to being visited by members of the public outside of the Aboriginal community, however, a strategy for interpretation can be considered later if it becomes relevant.

## 5 CONTACTS

Name	Contact information
HNSW	4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150 Locked Bag 5020, Parramatta NSW 2124 Phone: 02 9873 8500 Email: <a href="mailto:heritagemailbox@environment.nsw.gov.au">heritagemailbox@environment.nsw.gov.au</a> Environment Line: 02 9995 5550
WRQ	E.B. Mawson & Sons Pty Ltd 141 King George Street Cohuna 3568 (PO Box 66) Victoria, Australia Tel 03 5456 2409 Toll Free 1800 423 456
Landowners	E.B. Mawson & Sons Pty Ltd 141 King George Street Cohuna 3568 (PO Box 66) Victoria, Australia Tel 03 5456 2409 Toll Free 1800 423 456
Griffith LALC	PO Box 8043 East Griffith NSW 02 6962 6711
Carrathool Shire Council	PO Box 12 Goolgowi NSW 2652 Phone: 02 6965 1900

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OEH 2019	Office of Environment and Heritage. 2019. <i>Statement of Management Intent: Koomaringa Aboriginal Place [draft]</i> .
OzArk 2024	OzArk Environment & Heritage. 2024. Revision 3 <i>Western Riverina Quarry Expansion Aboriginal Cultural Heritage &amp; Historic Heritage Assessment Report</i> . Report for R.W. Corkery & Co. Pty Limited on behalf of E.B. Mawson & Sons Pty Ltd.
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Tindale 2000	Tindale, A. 2000. <i>Wiradjuri Language Development Project</i> . University of California Press.
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**APPENDIX 1: WRQ DEVELOPMENT APPROVAL**

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**APPENDIX 2: KOOMARINGA ABORIGINAL PLACE GAZETTE NOTICE.**

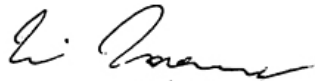
1 February 1991

OFFICIAL NOTICES

945

**NATIONAL PARKS AND WILDLIFE ACT 1974****ABORIGINAL PLACE**

In pursuant of the powers vested in me under Section 84 of the National Parks and Wildlife Act, 1974 I, the Minister for Environment, do by this my order, declare such of the lands described hereunder as an Aboriginal Place



Minister for Environment

**DESCRIPTION**

Land District - Hay

Shire - Carrathool

County Cooper, Parish Cocoparra, being part portion 3, commencing at a point on the western boundary of portion 3 aforesaid distant 2900 metres from the north-western corner of that portion and bounded on the north by a line bearing 90 degrees magnetic to the north western boundary of Lachlan Range State Forest No. 840 (No. 4 Extension), on the south-east by that boundary south-westerly to the south-western boundary of portion 3 aforesaid and on the south-west and west by parts of the south-western and western boundaries of that portion to the point of commencement. NPWS. A1201.

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NEW SOUTH WALES GOVERNMENT GAZETTE No. 20

## APPENDIX 3: WIRADJURI STAKEHOLDERS' RESPONSES TO THE DRAFT PLAN

Email received 31 May 2023

**From:** Peter Ingram <[REDACTED]>

**Sent:** Wednesday, May 31, 2023 11:15 AM

**To:** Catherine Burrowes <[catherine@ozarkeh.com.au](mailto:catherine@ozarkeh.com.au)>

**Subject:** Re: Draft Plan of Management for the Koomaringa Aboriginal Place

AP report for Rankin Springs

The Rankins Springs ACH stone quarry is a important significant area wiradjuri people.. the silcrete stone is only found in that area Miles around and would have been accessed, traded and utilised over the lower Murrumbidgee to the lower Lachlan river area.. now Rankin Springs stone quarry is not just important because of the resources of stone . The local area was inhabited seasonal by all local mob/people for ceremony/lore and sustainable resource able living. there's are fresh water Rockwell's/water springs ( only meter away from the AP site) certain diverse vegetation and Verity native animals species that call that place home. Very significant area..(a large quandong tree near the homestead)

For future in relation AP aera.....

Have a partnership/management in the interim to potentially have full ownership freehold leased of the area to maintain and continue cultural practises the future generation.

With management of the area there could be a financially sustainable opportunity for resources like wood, stone, feral animal management/control , natural land scape renewal with cultural activities, infrastructure to hosting a resort, youth and mental health programs programs could being implemented... Create a plan of management for overall area to allow the local Aboriginal community negotiation for freehold land ownership for the area from NSW gov...

To run porgams and community events in area to avoid damage site protection and regulations. monitoring. Over just Lockin up the bush area, to be invader by vermin species of animals and water living locally with horticultural agricultural structures in places to create employment for local people could bee possible...for multiple generations of the movie

....., Questioning sheets.....

Reinvigoration of cultural practises 4 generations become that there is a certain areas designated continue used and structural offline vital resources... Create new amble stone in that area and when cleaning up the site area potential neighbouring properties of the silcrete stone could be used future creations creating new line... a new signage with clear and understandable information potential rest seating and share houses for elders teach the next generation of old culture approaches...



## Management aims

Aim to maintain, strength, protection of vulnerable cultural values/site and oppose a business model to run and operate the whole area including the quarry and other farming practises

.....Bush management with firewood and hardwood collection...

.....Feral animal goat removal and saleyards sales international.

.....Fire management and routines for cultural Burns activities..

.....Any other farming activities sustainably focus

..... Resort, getaway, camps, tourism, youth and mental health programs

.... Maintain Springs and Rockwell's and any other sites in the area

..... Sustainable ways to make revenue. Without destroying landscape and cultural values of the area

I'll attach the questionnaire sheet in this email

Hope that helps

Thanks again Peter Ingram

Email from Robert Carroll, 14 November 2023.

Re: Western Riverina Quarry and Koomaringa Plan of Management - Message (HTML)

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Translate

Zoom

Delete

Respond

Move

Tags

Up

Editing

Immersive

Language

Zoom

Re: Western Riverina Quarry and Koomaringa Plan of Management

RC

Robert Carroll

To: Ben; Mark Saddler; James Ingram

You replied to this message on 14/11/2023 11:07 AM.

Reply

Reply All

Forward

Tue 14/11/2023 9:33 AM

Ben

I have copied Mark and James into this email because of their long term involvement in this important Wiradjuri Aboriginal cultural site that can be traced back to the former Wiradjuri Regional Aboriginal Land Council in 1986/87, and thank you for copies of both the draft Plan of Management 2023 and the revised Aboriginal Cultural Heritage & Historic Heritage Assessment Report completed by OzArk in 2023, over the years I haven't received a lot of the documents.

We visited the Koomaringa site with Roley Williams and Dennis Ingram back in the mid 1980's and were completely stunned and blown away not only at the size or magnitude of the Wiradjuri tool making site but its significance and importance to Wiradjuri people and communities.

Over the years and through my involvement with the Griffith LALC and more recently as an Aboriginal RAP and member of the Wulumarra Culture & Heritage Group we have become aware that Wiradjuri people have had virtually no input into the oversight of the mining operations and monitoring and protection of the Koomaringa Aboriginal Place since it was declared by the Minister for Environment on the 1st February 1991, we have been effectively shut out of all of the activities on the site.

I say this with all respect, Western Riverina Quarry (WRQ) was granted development consent on the 25th May 1987, by the Carrathool Shire Council and it was declared an Aboriginal Place in 1991 and a draft Plan of Management has been prepared in 2023.

So it's only taken 36 years to get serious about implementing a range of recommendations that will not only involve the establishment of a proposed Koomaringa Management Group and other initiatives to protect and manage Tool making sites A & B but also the other 19 Aboriginal sites identified either within or near the buffer zone.

I agree with Mark and James that we need to immediately visit the Koomaringa Aboriginal Place so that we can physically inspect and assess the site and the proposed expansion of the WRQ within the Koomaringa Aboriginal Place, it is far too difficult to inspect documents, maps and reports and then be able to make additional informed decisions and recommendations about ongoing protection of this important Wiradjuri site.

Your earliest attention and response to this email would be gratefully appreciated.

Mandaang Guwu  
Robert Carroll  
Miyagan Culture and Heritage  
Wulumarra Culture and Heritage

Email record of site visit, 24 November 2023.

Western Riverina Quarry Site Visit 24/11/23

JH

Jordan Henshaw

To: Ben

You replied to this message on 27/11/2023 7:13 AM.

Reply

Reply All

Forward

Sun 26/11/2023 9:34 PM

POM Letter 26.11.23.pdf

.pdf File

Hi Ben,

I have attached a letter report from Mark Saddler above.

In summary, the previous owners of the quarry, Chris Woods and his father Peter, where happy to show me around the current quarry operations and previously recorded Aboriginal sites and commented that they have never intended to harm any Aboriginal sites and continued to respect the Aboriginal cultural values that exist at these sites.

However, the RAPs who were invited to attend the site visit where generally unhappy with the current condition of both recorded sites.

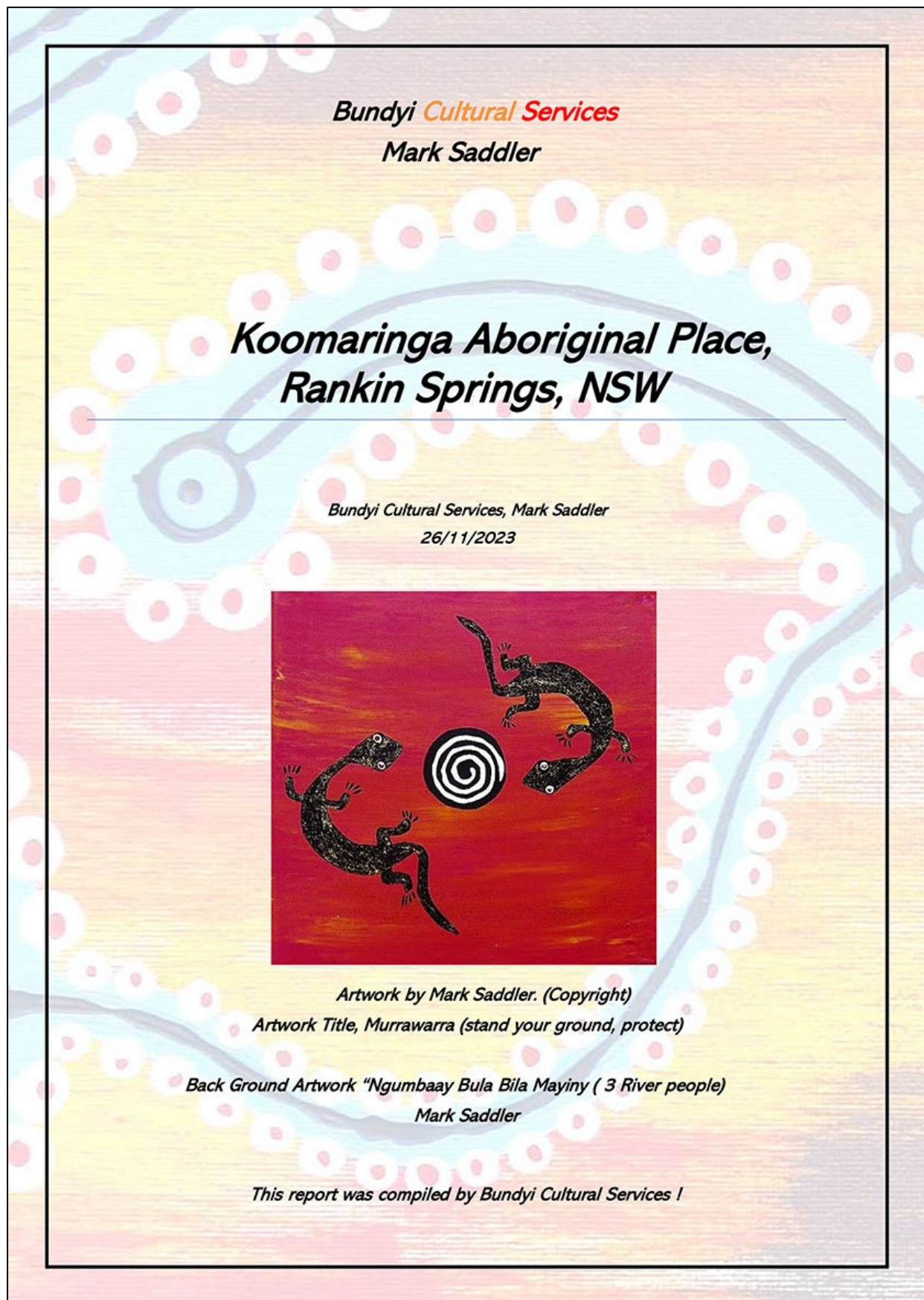
In particular, Robert Carroll stated that 40 – 50 piles of worked stone artefacts, approximately 2 feet high, had previously existed when the sites were recorded in 1987, and became increasingly distressed and agitated at the fact that they were no longer present during the current site visit. He also believed that metal stakes, outlining the extent of the sites, were also previously present and implied that they had been removed since he last visited the sites, approximately 12 years ago.

Mark Saddler also expressed his general disappointment at the fact that no Plan of Management had been recommended by OzArk and that both sites needed to be fenced as soon as possible so that no harm could occur to either site. As mentioned in the above report, Mark would like to return to the quarry in order to personally facilitate the fencing of both sites with the assistance of Robert Carroll and James Ingram.

In an attempt to defend themselves, both Chris Woods and his father openly stated that no fencing or artefact "piles" had been disturbed during their time as quarry owners but left the site visit visibility upset that their good intentions and respect for local Aboriginal people appeared to be in vain.

Thanks,  
Jordan

Letter from Mark Saddler (Bundyi Culture), 26 November 2023.





## ***Contents:***

- Page 1: Title Page.*
- Page 2: Contents, Acknowledgement.*
- Page 3: Travelling Stock Reserves (TSRs)*
- Page 4: Objectives, Objects.*
- Page 5: Due Diligence.*
- Page 6: Due Diligence Flow Chart.*
- Page 7: AHIMS Data Base Search.*
- Page 8: Site Location Maps.*
- Page 9: Site Recordings, Site Information.*
- Page 10: Contact Information.*
- Page 11: Site Report and Recommendations.*
- Page 12: Site Report and Recommendations.*
- Page 13: References and End Report*

***"I would like to acknowledge the traditional custodians of this land, my land, "The Wiradjuri People"***

***What I record and find is dedicated to those who have gone before us, to those present and to those who will follow us"***

***Mark Saddler, Wiradjuri Gibirr (man)***



## Travelling Stock Reserves (TSRs)

*Travelling Stock Reserves (TSRs) are parcels of Crown land reserved under legislation for use by travelling stock. Local Land Services is responsible for the care, control and maintenance of almost 500,000ha of TSRs in NSW.*

*TSRs provide pasture reserves for travelling or grazing stock. These reserves can be beneficial in times of drought, bushfire or flood. They are also used for public recreation, apiary sites and for conservation.*

*Local Land Services manages the land to strike a balance between the needs of travelling or grazing stock and the conservation of native species.*

*The role of Local Land Services role in managing TSRs includes:*

- *Authorising and monitoring stock, recreation and apiary site use*
- *Controlling noxious weeds*
- *Controlling pest animals and insects*
- *Provision and maintenance of fencing, watering points and holding yards*
- *Consideration of land management and animal health legislation.*

*Local Land Services has developed the first draft state-wide planning framework for TSRs to support the future management of this land. We are now keen to hear from the public with their opinions on how to manage TSRs in the future. We want to understand the values people hold important for TSRs, including biodiversity and Aboriginal cultural heritage values.*

*The draft state-wide framework allows for the development of TSR regional management plans to facilitate more consistent and transparent management, resourcing and reporting.*

[NSW Travelling Stock Reserves Draft State Planning Framework 2016-19](#)  
[TSR State Planning Framework Fact Sheet](#)  
[Frequently asked questions](#)

## ***Aboriginal objects:***

*Aboriginal objects are physical evidence of the use of an area by Aboriginal people. They can also be referred to as 'Aboriginal sites', 'relics' or 'cultural material'.*

*Aboriginal objects include:*

- \* Physical objects, such as stone tools, Aboriginal-built fences and stockyards, scarred trees and the remains of fringe camps*
- \* Material deposited on the land, such as middens*
- \* The ancestral remains of Aboriginal people.*

*Handicrafts made by Aboriginal people for sale are not 'Aboriginal objects' under the NPW Act.*

*Known Aboriginal objects and sites are recorded on OEH's Aboriginal Heritage Information Management System (AHIMS). If you find a site you should report it to us.*

## ***Protecting Aboriginal objects and places:***

*You will need to exercise due diligence in determining whether your actions will harm Aboriginal objects. The Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW*

*<http://www.environment.nsw.gov.au/resources/cultureheritage/ddcop/10798ddcop.pdf>*

*This link will explain and provide practical guidance about what due diligence means.*

*Anyone who exercises due diligence in determining that their actions will not harm Aboriginal objects has a defence against prosecution for the strict liability objects offence if they later harm an Aboriginal object.*

*An Aboriginal Heritage Impact Permit (AHIP) can be issued by OEH under Part 6 of the NPW Act where harm to an Aboriginal object or Aboriginal place cannot be avoided. An AHIP is a defence to a prosecution for harming Aboriginal objects and/or Aboriginal places if the harm was authorised by the AHIP and the conditions of that AHIP were not contravened.*

*Find out about AHIPs, due diligence and care agreements see **Information on Aboriginal Heritage Impact Permits.***

*<http://www.environment.nsw.gov.au/licences/Section87Section90.htm>*



## ***Purpose of code of practice for Due Diligence.***

*This code of practice is to assist individuals and organisations to exercise due diligence when carrying out activities that may harm Aboriginal objects and to determine whether they should apply for consent in the form of an Aboriginal Heritage Impact Permit (AHIP). The National Parks and Wildlife Act 1974 (NPW Act) provides that a person who exercises due diligence in determining that their actions will not harm Aboriginal objects has a defence against prosecution for the strict liability offence if they later unknowingly harm an object without an AHIP.*

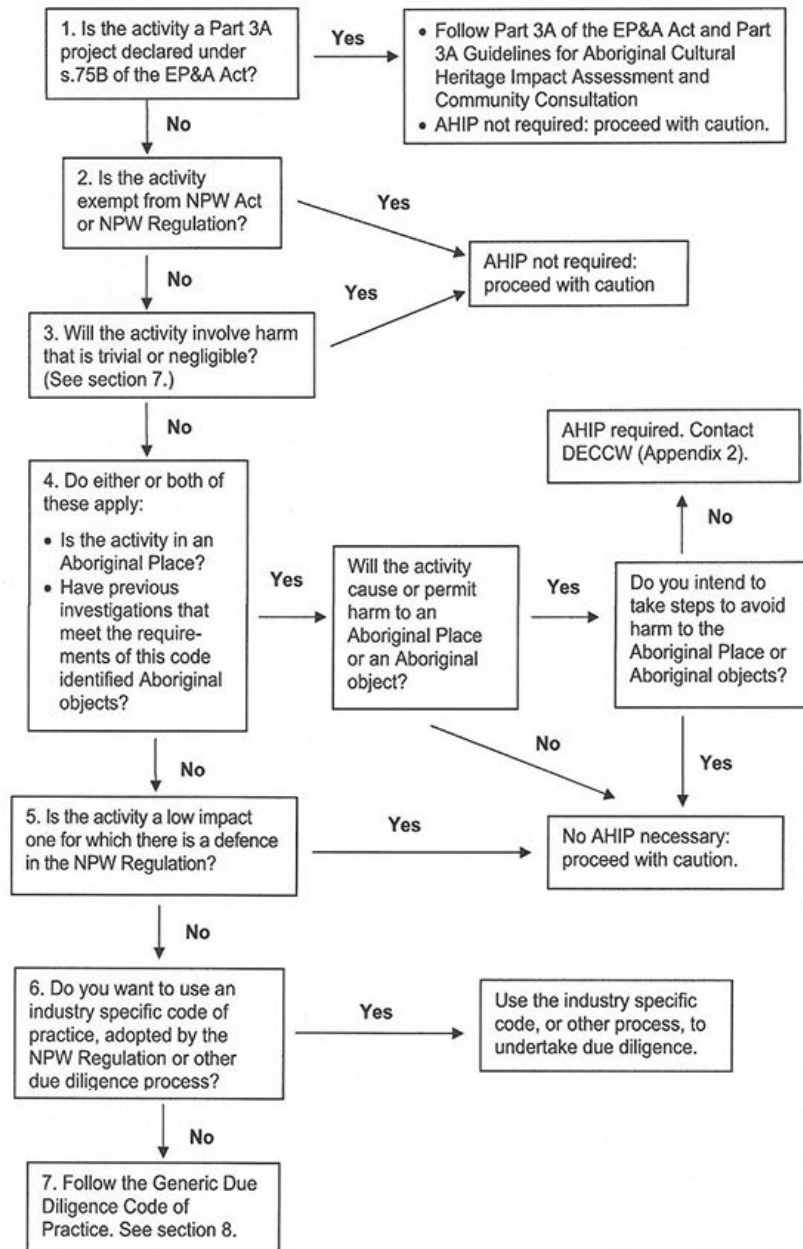
*The NPW Act allows for a generic code of practice to explain what due diligence means. Carefully following this code of practice, which is adopted by the National Parks and Wildlife Regulation 2009 (NPW Regulation) made under the NPW Act, would be regarded as 'due diligence'. This code of practice can be used for all activities across all environments.*

*This code sets out the reasonable and practicable steps which individuals and organisations need to take in order to: 1 identify whether or not Aboriginal objects are, or are likely to be, present in an area 2 determine whether or not their activities are likely to harm Aboriginal objects (if present) 3 determine whether an AHIP application is required.*

*If Aboriginal objects are present or likely to be present and an activity will harm those objects, then an AHIP application will be required. Information about the permits and how to apply for them can be obtained through the Department of Environment, Climate Change and Water (DECCW) website at*

*[www.environment.nsw.gov.au/licences/index.htm](http://www.environment.nsw.gov.au/licences/index.htm).*

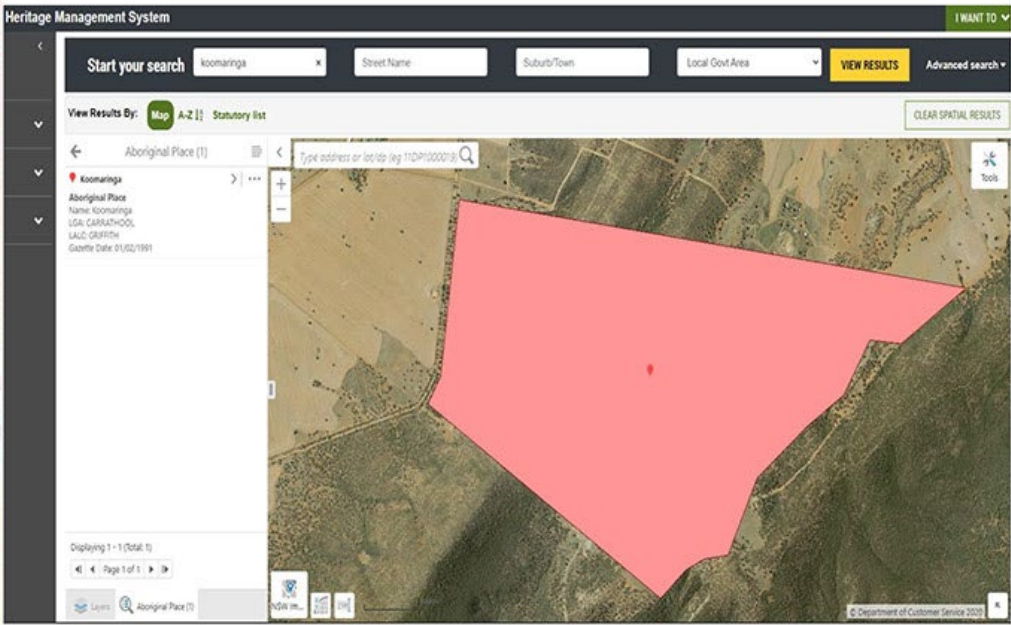
## 1 Do you need to use this due diligence code?







*Maps and reference location to site:*





## ***Site recordings and location of site cards relevant to this site:***

Site name	Koomaringa AP, Rankin Springs, NSW		
Recorder	Mark Saddler		
Contact details	Ph 0412 693 030	Email:	<a href="mailto:marksad@live.com.au">marksad@live.com.au</a>
Date prepared	26/11/2023	Web:	<a href="http://www.bundyculture.com.au/">http://www.bundyculture.com.au/</a>

AHIMS ID (Site Card ID)	Site Type	Location of Site Cards on Web Page.	Date Recorded

***Any site cards that have been done have been recorded by OzArk Environment & Heritage.***

***Please contact Ben Churcher***

***Principal Archaeologist Ph 0416 009 910***

## Contact Information

Stakeholder details	Responsibilities	
Jackie Taylor Senior Heritage Officer	Heritage Programs, West - Heritage NSW	(02) 6229 7089
National Parks and State Forests	Head Office	
Thomas Walter, Milbrae	Reginal Quarry Manager	0407 324 586
Bundy Cultural Services, Mark Saddler	Culture Advisor, Recorder, Knowledge Holder	0412 693 030
Ben Churcher Principal Archaeologist. OzArk Environment & Heritage	Heritage Consultant	0416 009 910

To find out more about Cultural Site Management, rules and protection go to this these web page links for more in depth information.

Do you need to use the due diligence code?

<http://www.environment.nsw.gov.au/resources/cultureheritage/ddcop/10798ddcop.pdf>

OEH legislation which ensures that Aboriginal cultural heritage must be considered as part of land management practices.

<http://www.environment.nsw.gov.au/conservation/aboriginalculture.htm>



## ***Site Report and Recommendations.***

***26/11/2023***

***Koomaringa AP, Rankin Springs, NSW. Wiradjuri Country.***

*On my site inspection on 24/11/2023, I walked and covered a very large area of Koomaringa AP, Rankin Springs, to assist in trying to locate many hundreds of artifacts for safe keeping and protection. This work is to assist the current and former owners of the quarry site which sits inside the Aboriginal Place (AP).*

*Koomaringa is a very spiritual place for my Wiradjuri people and as such has many special places, songlines and dreaming places that my people have cared for and continue to have connection to for over 80,000 + years.*

*On my recent visit, I witnessed that no exclusion zones or fencing were evident in the area that needs protection from quarry works. As this AP has had many visits from OzArk and others, to record sites and places, (recordings from 1987 to current day) I struggle to understand why the old and current quarry owners have not been correctly informed on their responsibility to protect this ancient site from any further destruction?*

*I have several questions and also some statements that I will make that need to have urgent replies and action taken.*

***Question:*** *Why is it that exclusion zones have not been erected in the areas of our artifacts and special places so as to protect from further damage?*

***Question:*** *Why is it that a "Plan of Management" (POM) has not been done or asked to be done by those who have declared this place an AP, and why have the people who have written reports with regards to this place not insisted or enforced that a POM be done in the past?*

***Question:*** *On the day of my survey 24/11/2023, I saw a sign on the Northern Entrance that states that "Carrathool Shire" had an "Application of Development" lodged for a "Rock Quarry & Gravel Crushing Plant" I would ask to be able to see that application to verify the information and the approval processes that may or may not have taken place?*

***Statement:*** *Myself, Mark Saddler RAP, Uncle James Ingram, RAP and Uncle Rob Carroll, RAP are deeply concerned about what has happened to this AP. The reason why we attended this week onsite was because I was aware that WaterNSW had been accepting Basalt Rock from this quarry site and I was very concerned about the fact that this AP does not have a POM in place for the protection of our sites. I told WaterNSW to stop taking resources from this quarry site until we sort out the issues.*

*Uncle James Ingram and Uncle Rob Carroll will, in due course, also write letters about their feelings and investigations of this appalling lack of attention to detail with regards to an AP and an ancient Wiradjuri site.*

*For those Ministers, Governments, councils, shires and other departments and staff, including archaeologists who have so badly disrespected this site and our Wiradjuri culture, by not ensuring and enforcing a POM be in place from before the AP declaration in 1991, I will be addressing your roles as well very shortly.*

*I believe that the previous and current quarry owners/operators have sought to get the right information from those who should know about these things. The quarry owners/operators should be very disappointed in how their monies have been spent for trying to gain*



*assistance in how to protect and work in an AP area as the information and assistance has not been correctly done or supplied.*

*To date, I still have not seen any information on a POM, or how to fix what has gone wrong.*

*With regards to the AP and POM, I insist that myself, Uncle James Ingram and Uncle Rob Carroll be engaged for at least 5-7 days work to oversee the erection of exclusion zones, the expansion of recorded site areas, the more in depth and complete survey work and site recording, and the allowing of myself to do 3 D Drone Mapping of the area.*

*The 3 D Mapping is done for my information, if these are wanted by others then a set rate, which will be advised, will be charged.*

*Also, our contract rates for the above work will need to be negotiated with those concerned. As we already have our work rates and conditions for other jobs in place, these can be supplied in further discussions.*

*In conclusion, to have an ancient Wiradjuri quarry site of at least 40,000 years treated in these most disrespected ways just makes me shake my head and point my finger at those who have failed in their duties as public servants and professionals in their fields of expertise.*

*Yuwin Ngadhi Mark Saddler Ngurrigilang Wiradjuri Gibirri!  
(Name Mine Mark Saddler Proud Wiradjuri Man)*

*To understand more about working in and around aboriginal sites look at the procedures to work around Aboriginal sites. Information can be found at this link,*

*<http://www.aboriginalheritage.org/sites/legislation/>*

## References:

OEH, <http://www.environment.nsw.gov.au/>

Local Land Services, <http://www.lls.nsw.gov.au/livestock/stock-routes>

Mark Saddler, Cultural Advisor and Knowledge holder, [www.bundyculture.com.au](http://www.bundyculture.com.au)

Goggle Earth Maps, <https://www.google.com/earth/>

Aboriginal Heritage, <http://www.aboriginalheritage.org/sites/legislation/>

*Prepared by:*

*Mark Saddler, Bundyi Cultural Services*

*P.O.B 8005 Koorringal Post Office NSW 2650*

*Ph: 0412 693 030*

*Email: [marksad@live.com.au](mailto:marksad@live.com.au)*

*Web: [www.bundyculture.com.au](http://www.bundyculture.com.au)*

*Copyright Mark Saddler Artwork and Report.*



Letter from Robert Carroll (Miyagan Culture and Heritage), 29 November 2023.**Miyagan Culture and Heritage**

ABN: 90613071198

Address:

Email:

Mobile:

**“Koomaringa Aboriginal Place & Quarry”**

I write pertaining to my walk over and inspection of the above significant Wiradjuri site on the 24<sup>th</sup> November 2023, in the company of Mark Saddler – Bundy Cultural Services, James Ingram – Bidya Marra consultancy, the current owner and various staff from the quarry.

I first visited the Koomaringa rural property with Roley Williams – Aboriginal site curator with the Wiradjuri RALC at the invitation of the then owner Glen Neyland way back in 1987, to inspect the size and significance of this unique Wiradjuri Aboriginal tool making site.

This was not the only occasion I have visited the site, in fact over the years I have been out to it previously with James Ingram, Roley Williams, Dennis Ingram, and Stephen Young on several occasions.

What astounded Roley, I and everyone else who has ever visited the site was its overall size, which included A & western Cultural B tool making sites and the sheer numbers of mounds of worked felsite debitage or tailing's, artefacts, bedrock anvils and the percussion scars that are clearly visible on the remaining felsite vein which were created by ancient Wiradjuri tool makers smashing larger basalt blocks into it to gather core material for further working.

In February of 1987, Dan Witter – Archaeologist with National Parks & Wildlife Service (NP&WS) at Coonabaraban completed an inspection and Report with Judith Webster also of NP&WS and commented that the:

“Koomaringa Aboriginal stone quarry is an outstanding example of its kind, he also estimated that it is between 5,000 and 20,000 years old and could have been used as an ancient Wiradjuri tool making site for up to 40,000 years”.

What has disappointed me, and many other Wiradjuri people is that this important Aboriginal site has never been afforded the importance, care and protection that it rightfully warrants/deserves by previous or current owners of the Quarry or by any government agency that has the legislative responsibility for the ongoing protection of significant Aboriginal Places, sites or cultural material.

I remember in an earlier visit to the site, that I clearly noticed there were very visible steel star pegs with yellow plastic tips marking the buffer or exclusion area to the site, they all appear to have been removed, and only a few wooden pegs remain and the once very noticeable and prominent mounds of worked felsite debitage or tailings have all been scattered and are no longer visible.

My question is why was this allowed to happen and who was responsible for it happening? because it has completely ruined the protection and overall appearance and importance of the site to any potential future untrained Aboriginal or non-Aboriginal visitor to the site eg Elder or children's groups undertaking a cultural or education excursion.

These prominent Wiradjuri tool making felsite debitage mounds need to be re-established and fenced off for ongoing protection from native or feral animals such as emu's, kangaroos, pigs and goats.

Why are there no Cultural signs on the edge of the buffer or exclusion zone that clearly explains the history, significance, and importance of the Koomaringa Aboriginal Place to various traditional and contemporary Wiradjuri Aboriginal groups and communities?



Why has it taken so long to develop a "Plan of Management" for the Koomaringa Aboriginal Place, when you consider it was declared an Aboriginal Place back on the 1<sup>st</sup> of February 1991, and received a letter of support from the Griffith LALC to acquire government grant funding on the 25<sup>th</sup> of January 2019, and now finally there is light at the end of tunnel and a draft document.?

Why have members of various Wiradjuri Aboriginal communities and RAPs been effectively shut out of the "Koomaringa Aboriginal Place" over the past 30 odd years and yet the various owners such as Milbrae Quarries Pty Ltd and EB Mawson & Sons Pty Ltd been allowed to mine non-stop, with no-one engaged on a full-time or part-time basis to regularly monitor the impacts or effects of the mining on the Aboriginal site or on nearby Aboriginal communities?

Have any of the previous or current mine owner provided any type of training or employment opportunities, educational scholarships/sponsorships or Aboriginal community development funding to Aboriginal individuals or Aboriginal communities during the life of the Koomaringa quarry, if not why hasn't this occurred?

Why hasn't a road been marked out and inspected for Aboriginal cultural material and then graded which would allow for easy walking or vehicle access to eastern Cultural site A?

There are so many other questions and concerns that need to be addressed around the ongoing quarrying within the "Koomaringa Aboriginal Place" and the ongoing protection of Wiradjuri Aboriginal Cultural Sites A & B.

I understand that Mark Saddler – Bundyi Cultural Services has made a number of recommendations within his comments, I strongly support his recommendations and I look forward to working with both Mark and James to immediately address some of our mutual concerns.

Mandaang Guwu (Thank you)

Robert Carroll  
Wiradjuri Ngurrundra Gibir

Letter from Mark Saddler (Bundyi Culture), 29 November 2023.

29<sup>th</sup> November 2023

To OzArk Environment & Heritage & Geoff Pigram PA Woods Pty Ltd.

My comments and replies to your Plan of Management Koomaringa Aboriginal Place, Rankin Springs, NSW, June 2023 are as follows.

*Section 1.3.5 Historical management arrangements within the Aboriginal Place, Page 9.*

*Quote "The stakeholder and landowners will take steps to mitigate the harm to Aboriginal Places which may be caused by animals".*

*What steps WILL be enforced onto stakeholders and landholders?*

*Section 1.3.5 Historical management arrangements within the Aboriginal Place, Page 10.*

*Quote "Stakeholders and landowners will be encouraged to consider the need for buffer zones around specific, sensitive sites within the Aboriginal Place"*

*I insist that buffer zones be enforced and not just encouraged.*

*Section 1.4 CULTURAL HERITAGE VALUES Page 12,*

*Quote "On 25 January 2019 Mr. Ethan Williams on behalf of the Griffith Local Aboriginal Land Council wrote:*

*This unique Wiradjuri Aboriginal quarry is of enormous spiritual and cultural significance to many Aboriginal groups and communities throughout this Region, and needs to be afforded the cultural respect, appreciation and protection it deserves."*

*Why is it that Mr. Ethan Williams did not enforce that buffer zones and that fencing be erected for the protection of our ancient site back in 2019?*

*Just making statements does not give protection of sites, they are only words spoken!*

*Section 2 MANAGEMENT PLAN*

*2.1 WIRADJURI STAKEHOLDERS AND OTHER PARTIES*

*In this section it appears that my name and role has not been entered, please ensure that Mark Saddler, Bundyi Culture RAP is included.*

*Also, I state that I was not sent the draft POM at any stage during this process. I find that strange as I was the one that instigated the investigation into WaterNSW taking resources from an Aboriginal Place that had no POM in place. So why is it that I was not given the draft report POM until 28/11/2023?*

*Section 3.1 KOOMARINGA MANAGEMENT GROUP*

*I need this report to also reflect the high importance of local Wiradjuri RAP (Registered Aboriginal Parties) in the draft report POM. Not just LALC's. It appears as though RAPs have been excluded from this process and report, we must be included as RAPs and "Knowledge Holders" in all processes in this report and POM and also in the KOOMARINGA MANAGEMENT GROUP. Also be advised that Wiradjuri Quarry Sites are mainly areas for men.*

#### *4.7.2 Newly identified heritage items*

*2. Advice will first be sought from a qualified archaeologist to determine whether the find constitutes an Aboriginal object, or a historic item of heritage significance.*

*This point needs to be expanded to include that "Wiradjuri Knowledge Holders and RAPs" be included in the process of identifying our items. Archaeologists are not the knowledge holders of our culture, we are.*

#### *4.8 SPECIFIC MANAGEMENT MEASURES TO MITIGATE RISK TO KNOWN HERITAGE*

##### *SITES*

##### *4.8.1 Site demarcation and signage*

*There are sixteen sites located outside the maximum limit of disturbance at the WRQ*

*(Koomaringa OS-01, OS-02, OS-3, OS-4, OS-05, OS-06, OS-07, OS-8, OS-09, OS-10, OS-11, IF-01, IF-02, PL-01, PL-02, and ST-01). To protect these sites from any inadvertent impacts during the life of the WRQ, it is recommended that two-star pickets with a sign attached between them be installed at each site facing the most obvious direction of travel from the quarry area.*

*We local RAPs are to be involved in the process of marking these above areas. Remuneration must also be paid for the time our people spend to do this work.*

##### *4.8.3 Public / Aboriginal community access*

*Permission to access the Koomaringa AP must be sought in writing from the Koomaringa Management Group.*

*You have no contact details for the above group in your Contacts, Page 45.*

*With regards to our survey work next week, James Ingram, Robert Carroll and Mark Saddler (RAPs) will be onsite and searching for the sites that have been recorded in your report, page 14.*

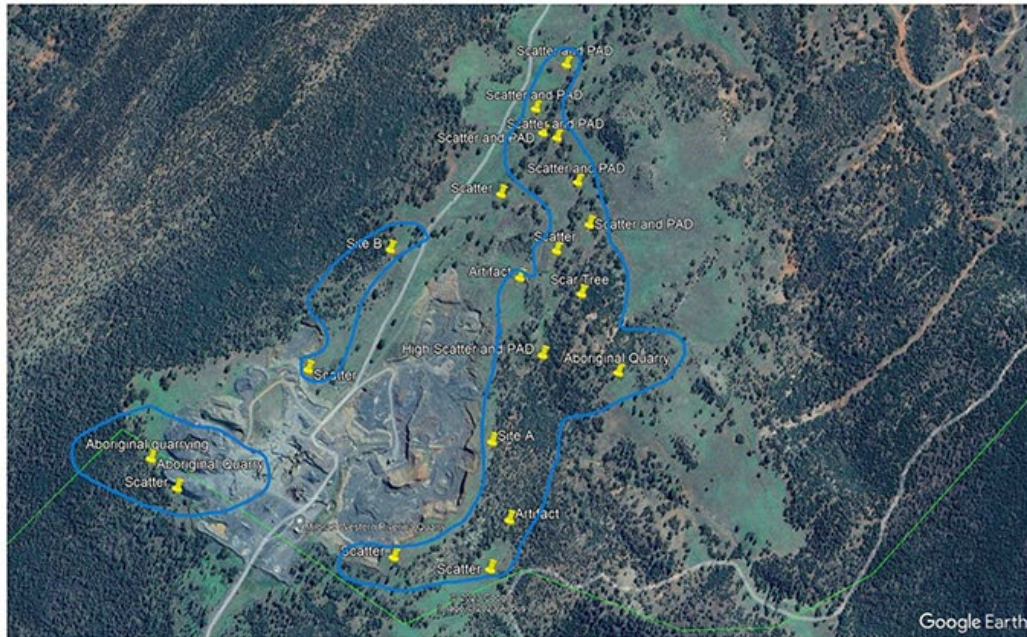
*We intend to also have Site A and Site B expanded so as to ensure that good coverage of artifacts and PADS are protected. We will be marking out places to have fencing erected as well.*

*Once the fencing is done (urgently) we will return to ensure that this has been done to our satisfaction. We would then insist that the new expanded areas and sites be updated on AHIMS to reflect the widened areas and protection zones.*

*I also have concerns about the Southern Side of the quarry site that has an area of high importance, site Koomaringa PL-01. This site has not been given exclusion zone status as have Sites A & B. Why is that? (see attached map next page)*

*My attached map also shows the extended areas of protection that I want to also have covered as we have many items and places that have already been recorded but have been left out of exclusion zone areas. Some areas are also very close to the places where this quarry operation are dumping their unwanted resources. Vehicles are driving over our sites.*





*Can I also have Ben Churcher supply me the GPS Eastings and Northings coordinates for the boundary areas of Sites A and B so that next week we can better identify the areas for widening fencing boundaries. Once done the areas then need to be surveyed again, GPS and recorded to AHIMS*

*I need to have my questions answered urgently and also need to have the GPS points sent to me this week.*

*Guwayu (safe travels)*

*Mark Saddler*

*Bundyi Culture*

*E: [marksad@live.com.au](mailto:marksad@live.com.au)*

*P: 0412 693 030*



Letter from Mark Saddler 3 January 2024.

## ***“Plan Of Management (POM) for Koomaringa”***

*Important issues that need to be addressed and included in the POM Report.*

- *A strong all-out effort/attempt must be made by NP&WS - Heritage NSW to elevate the importance and significance of the Wiradjuri Koomaringa tool making and cultural sites to government, mainstream community, Wiradjuri Aboriginal people and communities but also to anyone and everyone who has a deep interest in the ongoing protection and promotion of traditional Aboriginal culture and history.*
- *Registered Aboriginal Party (RAP) Names must be entered into the Plan Of Management as Mark Saddler - Bundyi Culture, James Ingram - Bidya Marra, Robert Carroll & Neerim Carroll -Miyagan Culture & Heritage.*
- *Four (4) Steel/aluminium signs are to be erected on steel poles at the North entrance, and just inside the individual boundary protection fences to major tool making Sites A, B and C (Which is located in a northern direction and adjacent to a massive pile of crushed rock/metal) at Koomaringa that advise of the importance of the area and also of the history of the Toolmaking site to Wiradjuri people and their traditional country. (The signs can be designed and produced at Design & Signs, Unit 2/68 Willandra Ave, Griffith - 02 6964 1488) These signs are to be designed by local RAPs and Aboriginal communities. The cost of the signs and their erection is to be paid for by the quarry owners.*
- *The ongoing monitoring of the quarry site and important cultural sites by the RAPs is to occur at least 4 times a year, these roles will be remunerated by agreed contracts.*
- *Feral animal "Eradication Programs" for feral pigs and goats need to be undertaken on an ongoing basis because these animals after wet weather are digging up the country, dispersing artefacts and destroying Wiradjuri sites.*
- *Community and individual access to Wiradjuri Cultural Places Toolmaking Sites A,B and C at Koomaringa is to be allowed to continue into the future with appropriate times and dates agreed to by all parties.*
- *A proportion of the existing poor road up to Site B Toolmaking site needs to be further developed/graded which would allow vehicle access for Aboriginal Elders and other interested groups entering from the "Northern Access Gate"*
- *A large "Car Park" and shelter area to be erected opposite Site A so that Wiradjuri Elders can undertake cultural training for our people as well as to non-Aboriginal people. Shelter should be large enough to accommodate at least 30 + people with some seating areas. and a Car Park for at least 10 cars.*

- *Cultural Training and Awareness Programs to be delivered to all staff who work on or with Koomaringa and any other quarry sites in Wiradjuri country. This will be delivered by Bundyi Culture as per an agreed contract. This must take place urgently.*
- *A written commitment to erect further fencing to protect additional recently identified Northern Wiradjuri cultural areas.*

*Since Uncle Rob Carroll, Uncle James Ingram and myself have been out to Koomaringa and surveyed large areas, we are requesting that the exclusion zones for sites A, B and C be documented to AHIMS as we have extended those areas to try and cover as many special areas and Wiradjuri cultural items as possible.*

*Further sites to the North of Koomaringa also need to be protected and fenced in the very near future to ensure that these sites are also protected from any further quarry expansion. See Map 1 Page 3. Sites highlighted **Red Circles**.*

*We also need Site C, to the South of Quarry, also to be included in the AHIMS update as a protected area. This area also has had exclusion zone fencing erected. See Map 2, Page 3. Site highlighted **Red Pins**.*

*With regards to 1.3.3 Local development POM (Plan of Management) Report.*

*Western Riverina Quarry (WRQ), also known as Koomaringa Quarry, was originally granted development consent by the Carrathool Shire Council on 25 May 1987 with a modified development consent granted on 19 July 1991.*

*As WRQ are seeking an extension their quarry site, I request a copy of the "modified Development Consent" that was granted on 19<sup>th</sup> July 1991 as well as any other consents that may have been granted, so as we may read and understand the extent of the proposed expansion areas to assess what, if any, further interference with our Wiradjuri places and items may possibly occur.*

*As RAPs, Wiradjuri Senior Men and Uncles, we are satisfied that Mr Chris Woods has done what we have asked, with regards to erecting "Exclusion Zone Fencing" to try to protect our Wiradjuri culture and places.*

*Once we can see the revised POM (Plan of Management) written, commitments in writing with regards to our requests for Koomaringa and the extension of our exclusion zones recorded to AHIMS, we would be in agreement to have WaterNSW continue to source from Koomaringa Quarry Site knowing that a correct POM (Plan of Management) is in place.*

*Guwayu (Safe Travel)*

*Mark Saddler - Bundyi Culture (RAP)*

*James Ingram - Bidya Marra (RAP)*

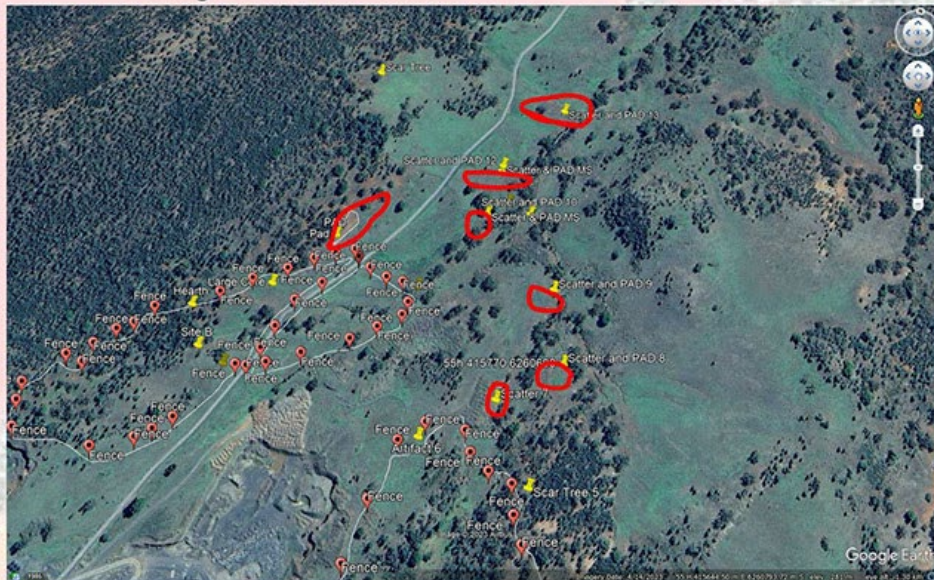
*Robert Carroll & Neerim Carroll -Miyagan Culture & Heritage. (RAP)*

*3<sup>rd</sup> January 2024.*

*Background Artwork, Murrawarra (Stand Your Ground) Mark Saddler*



**Map 1 Sites A & B**  
**Wiradjuri Artifacts and Work Areas**



**Map 2 Site C**



**Appendix 1 Figure 1: OzArk response to Wiradjuri stakeholder submissions.****Response to Robert Carroll - Miyagan Culture & Heritage**

	<b>OzArk Environment &amp; Heritage</b>  Dubbo   Queanbeyan      T: 02 6882 0118 Wollongong   Newcastle      enquiry@ozarkehm.com.au Katoomba      www.ozarkehm.com.au	<b>ABN 59 104 582 354</b>  145 Wingewarra St PO Box 2069 DUBBO NSW 2830
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18 February 2024

Robert Carroll & Neerim Carroll -Miyagan Culture & Heritage

**KOOMARINGA ABORIGINAL PLACE PLAN OF MANAGEMENT**  
**RESPONSE TO RAP SUBMISSIONS**

---

Dear Robert,

Thank you for your letter of 29 November 2023 regarding the Plan of Management (POM) for Koomaringa Aboriginal Place.

I have taken the liberty to tabulate your main questions and have provided a response to each below.

Should anything here raise any concerns, please do not hesitate to get in touch.

Kind regards,



Ben Churcher  
Principal Archaeologist  
ben@ozarkehm.com.au



## OzArk Environment &amp; Heritage

RAP comment	OzArk comment
I remember in an earlier visit to the site, that I clearly noticed there were very visible steel star pegs with yellow plastic tips marking the buffer or exclusion area to the site, they all appear to have been removed, and only a few wooden pegs remain and the once very noticeable and prominent mounds of worked felsite debitage or tailings have all been scattered and are no longer visible.	This concern has been acted on with the establishment of new fencing to protect Sites A, B, and C.  OzArk is not aware of the 'felsite mounds' and has no comment on why they may not be present today.
My question is why was this allowed to happen and who was responsible for it happening? because it has completely ruined the protection and overall appearance and importance of the site to any potential future untrained Aboriginal or non-Aboriginal visitor to the site eg Elder or children's groups undertaking a cultural or education excursion.	To the best of OzArk's knowledge, Site A and Site B have not been disturbed by the activities at the Western Riverina Quarry (WRQ) and that all impacts have remained outside of the buffer established in 1987.
These prominent Wiradjuri tool making felsite debitage mounds need to be re-established and fenced off for ongoing protection from native or feral animals such as emu's, kangaroos, pigs and goats.	Sites have been demarcated with new fencing. While this fencing does not exclude wildlife, it will ensure that there is no inadvertent harm arising from the quarry activities.
Why are there no Cultural signs on the edge of the buffer or exclusion zone that clearly explains the history, significance, and importance of the Koomaringa Aboriginal Place to various traditional and contemporary Wiradjuri Aboriginal groups and communities?	E.B. Mawson & Sons Pty Ltd has undertaken to fund this.  The location and wording of any signage will be discussed with the Koomaringa Management Group when it is formed.  It is imagined that the signs would recognise the significance of the Aboriginal Place and provide site access details.
Why has it taken so long to develop a "Plan of Management" for the Koomaringa Aboriginal Place, when you consider it was declared an Aboriginal Place back on the 1 <sup>st</sup> of February 1991, and received a letter of support from the Griffith LALC to acquire government grant funding on the 25 <sup>th</sup> of January 2019, and now finally there is light at the end of tunnel and a draft document.?	OzArk is not aware of why it took so long for a Plan of Management to be developed but notes that this has now been completed.
Why have members of various Wiradjuri Aboriginal communities and RAPs been effectively shut out of the "Koomaringa Aboriginal Place" over the past 30 odd years and yet the various owners such as Milbrae Quarries Pty Ltd and EB Mawson & Sons Pty Ltd been allowed to mine non-stop, with no-one engaged on a full-time or part-time basis to regularly monitor the impacts or effects of the mining on the Aboriginal site or on nearby Aboriginal communities?	As far as OzArk is aware, no one from the Wiradjuri Aboriginal community and RAPs have ever been excluded from the Quarry Site.  E.B. Mawson & Sons Pty Ltd will maintain any site demarcation fencing and signage.  It will be the responsibility of the E.B. Mawson & Sons Pty Ltd to monitor site buffers at the boundary of the WRQ operational areas on a regular basis and not less than every two years.  Photos from the northern, southern, eastern, and western perimeters of the approved quarry site

## OzArk Environment &amp; Heritage

RAP comment	OzArk comment
	<p>boundary will be taken to provide evidence that quarrying activities are within the approved quarry curtilage. Monitoring will be undertaken by at least two representatives of the Koomaringa Management Group, where practicable.</p> <p>At other locations within the Koomaringa AP, the Koomaringa Management Group should explore funding options with Heritage NSW (HNSW), to organise monitoring of the Koomaringa Aboriginal Place (AP) on at least a two-yearly basis.</p>
<p>Have any of the previous or current mine owner provided any type of training or employment opportunities, educational scholarships/sponsorships or Aboriginal community development funding to Aboriginal individuals or Aboriginal communities during the life of the Koomaringa quarry, if not why hasn't this occurred?</p>	<p>The WRQ has worked with the Aboriginal community and has an Indigenous engagement program in place. Past efforts of engagement have been unsuccessful as local groups did not have programs in place.</p>
<p>Why hasn't a road been marked out and inspected for Aboriginal cultural material and then graded which would allow for easy walking or vehicle access to eastern Cultural site A?</p>	<p>E.B. Mawson &amp; Sons Pty Ltd have agreed to facilitate access to the significant cultural heritage sites near the WRQ. This includes providing a car park and arranging access visits based on staff availability (for escorts) and operations at the WRQ (i.e. access being unsafe).</p>

Response to Mark Saddler - Bundyi Culture**OzArk Environment & Heritage**

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18 February 2024

Mark Saddler - Bundyi Culture

**KOOMARINGA ABORIGINAL PLACE PLAN OF MANAGEMENT  
RESPONSE TO RAP SUBMISSIONS**

---

Dear Mark,

Thank you for your letter of 29 November 2023 regarding the Plan of Management (POM) for Koomaringa Aboriginal Place.

I have taken the liberty to tabulate your main questions and have provided a response to each below.

Should anything here raise any concerns, please do not hesitate to get in touch.

Kind regards,

A handwritten signature in black ink, appearing to read 'B. Churcher'.

Ben Churcher  
Principal Archaeologist  
ben@ozarkehm.com.au

## OzArk Environment &amp; Heritage

POM recommendation	RAP comment	OzArk comment
Section 1.3.5 Historical management arrangements within the Aboriginal Place, Page 9.		
Quote "The stakeholder and landowners will take steps to mitigate the harm to Aboriginal Places which may be caused by animals".	What steps WILL be enforced onto stakeholders and landholders?	Feral animal control within the Koomaringa AP will be the responsibility of the Koomaringa Management Group who should explore funding options with HNSW to organise feral animal control. It is noted that this activity was also suggested by Mr Peter Ingram in his response to the Koomaringa AP Plan of Management.  Table 3-1 of the Koomaringa AP Plan of Management allows poisoning of feral animals to proceed within the Koomaringa AP without further management.
Section 1.3.5 Historical management arrangements within the Aboriginal Place, Page 10.		
Quote "Stakeholders and landowners will be encouraged to consider the need for buffer zones around specific, sensitive sites within the Aboriginal Place"	I insist that buffer zones be enforced and not just encouraged.	This request has been completed and the fencing has been installed with the assistance of Registered Aboriginal Parties (RAPs).
2. Advice will first be sought from a qualified archaeologist to determine whether the find constitutes an Aboriginal object, or a historic item of heritage significance.	This point needs to be expanded to include that "Wiradjuri Knowledge Holders and RAPs" be included in the process of identifying our items. Archaeologists are not the knowledge holders of our culture, we are.	Advice from an archaeologist is only the first stage of identifying whether an Aboriginal object has been discovered. If the object is Aboriginal, RAPs will be consulted.
(Koomaringa OS-01, OS-02, OS-3, OS-4, OS-05, OS-06, OS-07, OS-8, OS-09, OS-10, OS-11, IF-01, IF-02, PL-01, PL-02, and ST-01). To protect these sites from any inadvertent impacts during the life of the WRQ, it is recommended that two-star pickets with a sign attached between them be installed at each site facing the most obvious direction of travel from the quarry area.	We local RAPs are to be involved in the process of marking these above areas. Remuneration must also be paid for the time our people spend to do this work.	RAPs will be engaged to assist with the fencing of sites as is set out Section 9.2.4 of the Aboriginal Cultural Heritage Assessment Report (ACHAR).



Response to Mark Saddler - Bundyi Culture, James Ingram - Bidya Marra, and Robert Carroll & Neerim Carroll - Miyagan Culture & Heritage.



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18 February 2024

Mark Saddler - Bundyi Culture

James Ingram - Bidya Marra

Robert Carroll & Neerim Carroll -Miyagan Culture & Heritage.

**KOOMARINGA ABORIGINAL PLACE PLAN OF MANAGEMENT  
RESPONSE TO RAP SUBMISSIONS**

Dear Mark, James, and Robert

Thank you for your letter of 3 January 2024, "Plan of Management (POM) for Koomaringa".

I have taken the liberty to tabulate your main questions and have provided a response to each below.

Should anything here raise any concerns, please do not hesitate to get in touch.

Kind regards,

A handwritten signature in black ink, appearing to read "B. Churcher".

Ben Churcher  
Principal Archaeologist  
ben@ozarkehm.com.au

## OzArk Environment &amp; Heritage

RAP recommendation	OzArk comment
<p>Four (4) Steel/aluminium signs are to be erected on steel poles at the North entrance, and just inside the individual boundary protection fences to major tool making Sites A, B and C (Which is located in a northern direction and adjacent to a massive pile of crushed rock/metal) at Koomaringa that advise of the importance of the area and also of the history of the Toolmaking site to Wiradjuri people and their traditional country. (The signs can be designed and produced at Design &amp; Signs, Unit 2/68 Willandra Ave, Griffith - 02 69641488) These signs are to be designed by local RAPs and Aboriginal communities. The cost of the signs and their erection is to be paid for by the quarry owners.</p>	<p>E.B. Mawson &amp; Sons Pty Ltd has undertaken to fund this.</p> <p>The location and wording of any signage will be discussed with the Koomaringa Management Group when it is formed.</p> <p>It is imagined that the signs would recognise the significance of the Aboriginal Place and provide site access details.</p>
<p>The ongoing monitoring of the quarry site and important cultural sites by the RAPs is to occur at least 4 times a year, these roles will be remunerated by agreed contracts.</p>	<p>E.B. Mawson &amp; Sons Pty Ltd will maintain any site demarcation fencing and signage.</p> <p>It will be the responsibility of the E.B. Mawson &amp; Sons Pty Ltd to monitor site buffers at boundary of the Western Riverina Quarry (WRQ) operational areas on a regular basis and not less than every two years.</p> <p>Photos from the northern, southern, eastern, and western perimeters of the approved quarry site boundary will be taken to provide evidence that quarrying activities are within the approved quarry curtilage. Monitoring will be undertaken by at least two representatives of the Koomaringa Management Group, where practicable.</p> <p>At other locations within the Koomaringa AP, the Koomaringa Management Group should explore funding options with Heritage NSW (HNSW), to organise monitoring of the Koomaringa Aboriginal Place (AP) on at least a two-yearly basis.</p>
<p>Feral animal "Eradication Programs" for feral pigs and goats need to be undertaken on an ongoing basis because these animals after wet weather are digging up the country, dispersing artefacts and destroying Wiradjuri sites.</p>	<p>Feral animal control within the Koomaringa AP will be the responsibility of the Koomaringa Management Group who should explore funding options with HNSW to organise feral animal control. It is noted that this activity was also suggested by Mr Peter Ingram in his response to the Koomaringa AP Plan of Management.</p> <p>Table 3-1 of the Koomaringa AP Plan of Management allows poisoning of feral animals to proceed within the Koomaringa AP without further management.</p>

## OzArk Environment &amp; Heritage

RAP recommendation	OzArk comment
Community and individual access to Wiradjuri Cultural Places Toolmaking Sites A, B and C at Koomaringa is to be allowed to continue into the future with appropriate times and dates agreed to by all parties.	E.B. Mawson & Sons Pty Ltd have agreed to facilitate access to the significant cultural heritage sites near the WRQ. This includes providing a car park and arranging access visits based on staff availability (for escorts) and operations at the WRQ (i.e. access being unsafe). Times and dates of site visits will need to be pre-arranged with the WRQ.
A proportion of the existing poor road up to Site B Toolmaking site needs to be further developed/graded which would allow vehicle access for Aboriginal Elders and other interested groups entering from the "Northern Access Gate"	The decision to allow access to Site B will be taken by the Koomaringa Management Group who can decide on the location and form of any proposed access track. Until such times as the access track is installed, E.B. Mawson & Sons Pty Ltd will assist with the transport of people to Site B when required.
A large "Car Park" and shelter area to be erected opposite Site A so that Wiradjuri Elders can undertake cultural training for our people as well as to non-Aboriginal people. Shelter should be large enough to accommodate at least 30 + people with some seating areas. and a Car Park for at least 10 cars.	The Aboriginal Cultural Heritage Report (ACHAR) indicates the location for the car park ( <b>Figure 9-2</b> ). The location and form of the picnic shelter will be determined by the Koomaringa Management Group. E.B. Mawson & Sons Pty Ltd have undertaken to provide reasonable funding to construct the shelter and a path connecting the shelter to the car park.
Cultural Training and Awareness Programs to be delivered to all staff who work on or with Koomaringa and any other quarry sites in Wiradjuri country. This will be delivered by Bundyi Culture as per an agreed contract. This must take place urgently.	E.B. Mawson & Sons Pty Ltd agree to arranging a one-off face to face induction for WRQ staff. The content of this induction will then be presented as a training package for later use. Both the face to face induction and the provision of a training package will be under an agreed contractual arrangement.
A written commitment to erect further fencing to protect additional recently identified Northern Wiradjuri cultural areas.	The location and form of the any site fencing outside of the WRQ Quarry Site will be determined by the Koomaringa Management Group. Fencing at Sites A, B, and C has been installed with the assistance of Registered Aboriginal Parties.
Since Uncle Rob Carroll, Uncle James Ingram and myself have been out to Koomaringa and surveyed large areas, we are requesting that the exclusion zones for sites A, B and C be documented to AHIMS as we have extended those areas to try and cover as many special areas and Wiradjuri cultural items as possible.	Sites A, B, and C are currently registered with AHIMS, and as they are within the Koomaringa AP, their significance is recognised, and their current condition is protected.  Site C includes sites registered by OzArk as Koomaringa PL-01 (42-5-0023) and Koomaringa OS-11 (42-5-0020).

## APPENDIX 4: OzARK DOCUMENT CONTROL

Proponent	Heritage NSW
Document Description	Plan of Management: Koomaringa Aboriginal Place, Rankins Springs, NSW
File Location	OzArk Job No.
R.W. Corkery\Milbrae Quarries Eco and Arch July 2019\Koomaringa Aboriginal Place PoM\PoM report	2369
Document Status <b>V4.3 FINAL</b>	Date 5 June 2024
Author to Editor OzArk	V1.0– V1.2 AC author and edits 03/02/2020–10/3/2020
Draft report	V2.0 AC to Heritage NSW 10/3/2020 V2.1 AC edit 27/8/21 V2.2–V2.6 CJ update and BC edits 15/06/22–15/11/22 V2.7– V2.8: BC incorporates client comments and prepares for release to HNSW 30/11/22–19/1/23 V2.9–V2.10: BC edits on HNSW comments 19/4/23_27/4/23
Final report	V3.0–3.2 BC amends with stakeholder and client feedback: 25/5/23–21/6/23
Revised report	V4.0–4.2 BC revises and amends with client comments and/or addition of RAP recorded sites: 22/2/24–27/3/24 V4.3: BC amends with Council requests 5/6/24
Prepared for	Prepared by
Tracey Cotter PA Woods Pty Ltd PO Box 40, Leeton NSW 2705 Email: tracey@pawoods.com.au	Ben Churcher Principal Archaeologists OzArk Environment & Heritage 145 Wingewarra Street (PO Box 2069) Dubbo NSW 2830 P: 02 6882 0118 ben@ozarkehm.com.au
<p style="text-align: center;">COPYRIGHT</p> <p style="text-align: center;">© OzArk Environment &amp; Heritage 2024 and © Heritage NSW 2024</p> <p style="text-align: center;">All intellectual property and copyright reserved.</p> <p>Apart from any fair dealing for private study, research, criticism, or review, as permitted under the Copyright Act, 1968, no part of this report may be reproduced, transmitted, stored in a retrieval system, or adapted in any form or by any means (electronic, mechanical, photocopying, recording or otherwise) without written permission.</p> <p style="text-align: center;">Enquiries should be addressed to OzArk Environment &amp; Heritage.</p>	