



Office of  
Environment  
& Heritage

Your reference : MP10\_0144  
Our reference : DOC12/15576  
Contact : Jackie Taylor

Manager Industry  
Mining and Industry Projects  
Major Project Assessment  
GPO Box 39  
SYDNEY NSW 2001

Attention: Andrew Hartcher

Dear Mr Ritchie,

**RE: Shoalhaven Starches Pipeline Project (Concept Plan MP 10\_0144 and Project Application MP 10\_0108) Notification of Exhibition**

I refer to the exhibition of the concept plan application and environmental assessment under Part 3A of the Environmental Planning and Assessment Act 1979 (EP&A Act) of the above project. The Office of Environment and Heritage has reviewed the "*Shoalhaven Starches Gas Pipeline Scheme: Aboriginal and Historic Heritage Assessment*" report prepared by Kayandel Archaeological Services (dated June 2011) and provides the following comments with regard to Aboriginal Cultural Heritage.

1. Given no new Aboriginal objects or sites of potential were located during the survey or are going to be impacted by the proposed activities, and previous archaeological investigations covering parts of the Shoalhaven Starches development area (Navin 1992, Kuskie 2002 and Kuskie 2008) have provided similar results, OEH supports the recommendations that no further archaeological investigation is warranted.
2. Whilst no written comments were received from the registered Aboriginal stakeholders during the consultation process OEH notes that consultation for the project has been in accordance with the *Draft Guidelines for Aboriginal Cultural Heritage Impact Assessment and Community Consultation* (DEC, July 2005). Provided no correspondence is received during the public exhibition period, OEH is satisfied that registered Aboriginal stakeholders have been provided with an opportunity to comment on the proposed mitigation and management recommendations for the Project.
3. OEH notes that one registered Aboriginal stakeholder requested that a representative be present to monitor the initial ground disturbance works. Provided there is a process in place, such as an approved Aboriginal Heritage Management Plan, for immediate stop work and contacting of the relevant consent authority in the event that Aboriginal objects are discovered during the project, OEH does not require monitoring during development activities and considers this an issue between the proponent and Department of Planning and Infrastructure.

4. Following from the draft Statement of Commitments provided in section 9 of the EA, OEH recommends Department of Planning and Infrastructure consider including the following conditions for Aboriginal Heritage in the project consent:

The Proponent must prepare and implement an Aboriginal Heritage Management Plan, as part of the overall Construction Environmental Management Plan for the project, which should:

- (a) describe the procedures and measures that would be implemented if any Aboriginal objects or sites are discovered during the development;
- (b) describe the procedures for consultation with registered Aboriginal stakeholders should Aboriginal objects be discovered during the development; and
- (c) include a commitment to provide all site workers and contractors with induction training on the identification of Aboriginal objects, Aboriginal cultural awareness and procedures that must be followed in the event of discovery of unknown Aboriginal objects.

If have any questions or wish to discuss this matter, please contact Jackie Taylor on 6229 7089.

Yours sincerely



**Dr SANDIE JONES**

**Acting Manager – Landscape and Aboriginal Heritage Protection  
Conservation and Regulation Division**