

HERITAGE MANAGEMENT PLAN

Maragle 330kV Switching Station and 330kV Transmission Line Connections

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0.07	Approved By	Tim McCarthy	Project Manager	UGL	<i>Tim McCarthy</i>	15/08/2023
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ACRONYMS AND ABBREVIATIONS

Abbreviation	Explanation
AHMP	Aboriginal Heritage Management Plan
CEMP	Construction Environmental Management Plan
COA	Condition of Approval
CSSI	Critical State Significant Infrastructure
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DPE	Department of Planning and Environment
EIS	Environmental Impact Statement
EMS	Environmental Management System
EP&A	<i>Environmental Planning and Assessment Act 1979</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
HHMP	Historic Heritage Management Plan
HSE	Health Safety and Environment
km	kilometres
KNP	Kosciuszko National Park
kV	Kilovolts
LGA	Local Government Area
m	Metres
MW	Megawatts
MWh	Megawatt hours
NEM	National Electricity Market
NPWS	National Park and Wildlife Services
Proponent, the	NSW Electricity Networks Operations Pty Ltd as a trustee for NSW Electricity Operations Trust
UGL	UGL Engineering Pty Ltd
UGLMS	UGL Management System

1 INTRODUCTION

1.1 CONTEXT

In 2020 Snowy Hydro Limited (Snowy Hydro) obtained approval (application number SSI 9208 and EPBC 2018/8322) to expand the existing Snowy Mountains Hydro-electric Scheme (Snowy Scheme), by linking the existing Tantangara and Talbingo reservoirs through a series of underground tunnels and constructing a new underground hydro-electric power station (referred to as 'Snowy 2.0'). Snowy 2.0 will increase the generation capacity of the Snowy Scheme by almost 50%, by providing an additional 2,000 megawatts (MW). At full capacity Snowy 2.0 will provide approximately 350,000 megawatt hours (MWh) (175 hours) of large-scale energy storage to the National Electricity Market (NEM). This will be enough to ensure the stability and reliability of the NEM, even during prolonged periods of adverse weather conditions.

To connect Snowy 2.0 to the NEM, a new transmission connection is required. NSW Electricity Networks Operations Pty Ltd as a trustee for NSW Electricity Operations Trust (known as Transgrid and the Proponent) received development approval on 2 September 2022 to construct a substation and overhead transmission lines ('the Project') to facilitate the connection of Snowy 2.0 to the existing electrical transmission network, approximately 27 kilometres (km) east of Tumbarumba.

The Project was declared Critical State Significant Infrastructure (CSSI) under the *State Environmental Planning Policy (State and Regional Development) 2011* as part of the CSSI declaration for the Snowy 2.0 and Transmission Project in clause 9 of Schedule 5.

An Environmental Impact Statement (EIS) was prepared by the Proponent under Part 5, Division 5.2 of the NSW *Environmental Planning and Assessment Act 1979* to assess the environmental impacts of the proposed Project. The Minister for Planning is the determining authority for the Project.

In response to submissions made during exhibition of the EIS, a Submissions Report and Amendment Report was prepared by Transgrid (2021a, 2021b). The submissions resulted in changes to the Project design, additional assessments and updates to safeguards and management measures outlined in the EIS.

Transgrid received development approval for the Project on 2 September 2022 from the Minister of Planning.

The Project has also been subject to approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Approval (EPBC 2018/8322) was granted by the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) on 21 October 2022.

UGL Engineering Pty Ltd (UGL) has been engaged on behalf of the Proponent (Transgrid) to undertake the Project.

1.2 PROJECT DESCRIPTION

The Project is located within the Australian Alps in Southern NSW, about mid-way between Canberra and Albury and located wholly within the Snowy Valleys Local Government Area (LGA). The nearest large towns to the Project area are Cooma and Tumut. Cooma is about 80 kilometres (km) south-east and Tumut is about 55km north of the Project.

The eastern extent of the Project is defined by the location of the Snowy 2.0 cable yard at Lobs Hole in Kosciuszko National Park (KNP). From the cable yard, the transmission connection extends west through KNP and up Sheep Station Ridge characterised by steep, mountainous terrain before traversing Talbingo Reservoir. The transmission connection then continues west, crossing Elliott Way at three locations before entering Bago State Forest to the substation site.

The Snowy 2.0 underground power station will be connected to the principal transmission network through two 330 kilovolts (kV) double circuit transmission lines and the Maragle 330kV Switching Station. The Maragle Switching Station is to be connected to the network by cutting into the existing Lower Tumut to Upper Tumut 330kV transmission line.

Key elements of the Project include:

- A new substation located within Bago State Forest and adjacent to Transgrid's existing Line 64, which forms a 330kV connection between Upper Tumut and Lower Tumut switching stations.
- Upgrade and widening of an existing access road off Elliott Way to the substation including the construction of new driveways into the 330kV and 500kV switchyards.
- Two new 330kV overhead double-circuit transmission lines from the Snowy 2.0 cable yard to the new substation. Each line would be approximately 9km long and comprise approximately 21 steel lattice structures up to 75 metre (m) in height.
- One short overhead 33kV transmission line connection (approximately 300m in length) comprising both steel lattice structures and pole structures as required between the substation and Line 64.
- Construction of up to 8km of new access tracks to the transmission structures at Sheep Station Ridge, and upgrade to existing access tracks where required. The access tracks would remain following the completion of construction to service ongoing maintenance activities along the transmission lines.
- Ancillary construction activities, including the establishment of tensioning and pulling sites for conductor and earth wire stringing, crane pads, site compounds and equipment laydown areas, and the transport and haulage of equipment and waste to and from the Project area.

Other key details of the Project are detailed in Table 1.

Table 1-1 Project details

Project Component	Description
Proponent	Transgrid
Project Type	Design and Construct
Location	Snowy Mountains
Land Tenure	National Park and State Forest
Historical	National Park and State Forest
Zoned	C1 – National Parks and Nature Reserve and RU3 – Forestry
Project Working hours	Monday to Sunday 6.00am-6.00pm
Project Duration	29 months
Project Commencement	September 2023

1.3 ENVIRONMENTAL MANAGEMENT SYSTEM

The overall Environmental Management System (EMS) for the Project is described in the Construction Environmental Management Plan (CEMP). This Historic Management Plan (HMP) forms part of the CEMP for the Project and is to be read in conjunction with the overarching CEMP. It is applicable to all staff, contractors and sub-contractors associated with the construction of the Project.

The UGL Management System (UGLMS) incorporates the following for the management of heritage impacts on the Project:

- UGLMS-131-807 Contractor HSEQ Handbook

- UGLMS-4-1730 Environmental Inspection Checklist
- UGLMS-4-1549 Environmental Inspection Weekly Checklist
- UGLMS-4-2138 Site Environmental Plan
- UGLMS-4-2038 Cultural Heritage Sign Off
- UGLMS-4-2040 Cultural Heritage New Find.

These documents will support the implementation of the HMP.

1.4 PROJECT CONDITIONS OF APPROVAL

The Project Conditions of Approval (COA) B24 outlines:

Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Appendix 3, the Proponent must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:

- (a) *Be prepared in consultation with Heritage Council, Heritage NSW, NPWS and Aboriginal Stakeholders;*
- (b) *Include a description of the measures that would be implemented for:*
 - i. *Protecting the heritage items identified in Table 1 of Appendix 3, including fencing off the heritage items (where required) prior to carrying out any development that could harm the heritage items, and protecting any items located outside the approved construction envelope;*
 - ii. *Salvaging and relocating the heritage items identified in condition B23;*
 - iii. *Where impacts cannot be avoided to R56 and R120, details of the proposed archaeological research design and excavation methodology, and findings of the Final Archaeological Excavation Report, in accordance with the relevant Heritage Council guidelines;*
 - iv. *Minimising and managing the impacts of the development on heritage items within the construction envelope, including a strategy for the long-term management of any heritage items or material collected during the test excavation or salvage works;*
 - v. *A contingency plan and reporting procedure if:*
 - *Heritage items outside the approved construction envelope are damaged;*
 - *Previously unidentified heritage items are found; or*
 - *Aboriginal skeletal material is discovered;*
 - vi. *Ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and*
 - vii. *Ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and*
- (c) *Include a program to monitor and publicly report on the effectiveness of these measures and any heritage impacts of the development; and*
- (d) *Include a program to publish;*

i. *Any detailed archival records required under the conditions of this approval;*
and

ii. *The findings of any excavations and salvage works.*

Following the Planning Secretary's approval, the Proponent must implement the Heritage Management Plan.

This HMP has been divided into the following two plans to address COA B24:

- Aboriginal Heritage Management Plan (AHMP)– Appendix A
- Historic Heritage Management Plan (HHMP) – Appendix B

APPENDIX A ABORIGINAL HERITAGE MANAGEMENT PLAN

ABORIGINAL HERITAGE MANAGEMENT PLAN

Maragle 330kV Switching Station and 330kV Transmission Line Connections

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ACRONYMS AND ABBREVIATIONS

Abbreviation	Explanation
Aboriginal Object	Any deposit, object, or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains
ACHA	Aboriginal Cultural Heritage Assessment
AHIMS	Aboriginal Heritage Information Management System
AHMP	Aboriginal Heritage Management Plan
AS	Artefact Scatter
ASIRF	Aboriginal Site Impact Recording Form
CEMP	Construction Environmental Management Plan
CM	Construction Manager
COA	Condition of Approval
Code of Practice	Code of Practice for Archaeological investigation of Aboriginal Objects in NSW (DECCW 2010)
DPE	Department of Planning and Environment
EIS	Environmental Impact Statement
EMS	Environmental Management System
EP&A	<i>Environmental Planning and Assessment Act 1979</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
HMP	Heritage Management Plan
HHMP	Historic Heritage Management Plan
KNP	Kosciuszko National Park
kV	Kilovolts
m	Metres
NPWS	National Parks and Wildlife Service
PAD	Potential Archaeological Deposit
POM	Plan of Management
Proponent, the	NSW Electricity Networks Operations Pty Ltd as a trustee for NSW Electricity Operations Trust (Transgrid)
PTE	Permit to Excavate
RAPs	Registered Aboriginal Parties
SEA	Senior Environmental Advisor
SEP	Site Environmental Plan
UGL	UGL Engineering Pty Ltd
UGLMS	UGL Management System

1 INTRODUCTION

Refer to Section 1 of the Heritage Management Plan (HMP) for the Project context, description and Environmental Management System (EMS).

1.1 PURPOSE AND OBJECTIVES

The purpose of this Plan is to address the construction environmental management requirements detailed within the following documents:

- Snowy 2.0 Transmission Connection Project – Environmental Impact Assessment (Jacobs, Feb 2021).
- Snowy 2.0 Transmission Connection Project – Aboriginal Cultural Heritage Assessment (ACHA) (Jacobs 2021a).
- Snowy 2.0 Transmission Connection Project – Amendment Report (Transgrid, Dec 2021).
- Snowy 2.0 Transmission Connection Project – Addendum Non-Aboriginal and ACHA (Transgrid Dec 2021).
- Department of Planning and Environment (DPE) Infrastructure Approval 2 September 2022.
- Project EPBC Approval 2018/8363 (21 October 2022).

Additionally the purpose of this AHMP is to provide a consistent and transparent process for the management of Aboriginal cultural heritage sites to enable the Project team to design and undertake construction activities to avoid disturbance of Aboriginal cultural heritage objects or sites. This AHMP applies specifically to proposed activities carried out within Project designated area.

This AHMP seeks to mitigate potential impacts on Aboriginal cultural heritage by:

- Ensuring direct management of all mitigation actions considered necessary to protect Aboriginal cultural values in the area of the Project and all areas where ancillary works are approved to occur.
- Ensuring that no ground disturbing activities occur without a signed Site Environmental Plan (SEP) specific to the work area. Aboriginal heritage surveys and the identification of avoidance sites within or adjacent to the proposed work area shall be included in the SEP.
- Ensuring the development does not cause any direct or indirect impacts on any Aboriginal heritage items located outside the approved construction envelope.
- All reasonable precautions will be taken to protect Aboriginal heritage sites from damage caused by construction and associated activities including barricading / bunting.
- Salvage and relocate all heritage items identified for salvage and relocation to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010).
- Providing a mechanism to ensure the Project avoids impacts to such areas.
- Demonstrate respect for Aboriginal culture and ensuring that all involved with this Project demonstrate such respect.
- Providing protection for any unexpected Aboriginal cultural heritage material that is found during the construction phase of this Project.

The key objective of this AHMP is to reduce the impact of the Project activities on Aboriginal cultural heritage at and surrounding the Project through specific objectives and targets. Objectives for the management of Aboriginal cultural heritage are:

- To promote the safeguarding and protection of all Aboriginal cultural heritage in the area.
- To recognise that all forms of Aboriginal cultural heritage in the Project area is valued as equal importance to each other.
- Any impact to an Aboriginal cultural heritage site shall be recorded as an incident. An “incident” is defined as any of, or a combination of the following:
 - Non-compliance with the AHMP
 - Unintentional or unauthorised damage or loss to any Aboriginal cultural heritage site in the form of the impacts noted above
 - Any trespass outside of the approved works areas into an Aboriginal cultural heritage site
- Aboriginal cultural heritage management measures fully implemented and no incidents to occur.
- Consultation with all relevant stakeholders if any Aboriginal cultural heritage items are located.

This plan should be considered to be a live document that is amended in light of the learning experienced during its implementation. However, any proposed improvement and/or changes to this plan are required to be approved by the Planning Secretary prior to implementation. Further information about the nature of works to be completed and details on the Project can be found in the overarching CEMP.

2 ENVIRONMENTAL ASSURANCE

2.1 RELEVANT LEGISLATION AND GUIDELINES

2.1.1 LEGISLATION

Legislation relevant to heritage management includes:

- *Environmental Planning and Assessment Act 1979* (EP&A Act)
- *National Parks and Wildlife Act 1974* (NPW Act)
- *Native Title Act 1994* (NSW)
- *Native Title Act 1993* (Commonwealth)
- *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) (Commonwealth)
- *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* (Commonwealth)

Relevant provisions of the above legislation are explained in the register of legal and other requirements included in Appendix C of the CEMP.

2.1.2 GUIDELINES

The main guidelines, specifications and policy documents relevant to this Plan include:

- Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW 2010b).
- The Code Of Practice for the Investigation of Aboriginal Objects in New South Wales 2010 (DECCW 2010a).
- Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH 2011).
- Kosciuszko National Park Plan of Management 2006 (KNP PoM) (NSW National Parks and Wildlife Service 2006).
- Cultural Landscape Management: Guidelines for Identifying, Assessing, and Managing Cultural Landscapes in the Australian Alps National Parks (Lennon and Matthews 1996).

2.2 PERMITS AND LICENCES

There are no licences or permits directly relevant for the Project in respect to the management of Aboriginal heritage. Further details regarding permits and licences are provided in Appendix C of the CEMP.

2.3 PROJECT CONDITIONS OF APPROVAL

The Conditions of Approval (COA) and mitigation measures relevant to this Plan are listed in Table 2-1 below. A cross reference is also included to indicate where the requirement is addressed in this Plan or other Project management documents.

Table 2-1 Project conditions of consent relevant to the AHMP

Reference number	Requirement	Document Reference
Conditions of Approval		
COA A1	In meeting the specific performance measures and criteria of this approval, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, operation, rehabilitation, upgrading or decommissioning of the development.	This plan - Section 2.3 and Section 6
COA B22	<p>The Proponent must ensure the development does not cause any direct or indirect impacts on:</p> <ul style="list-style-type: none"> (a) Any Aboriginal heritage items located outside the approved construction envelope (refer to Appendix 3 of infrastructure approval); and (b) Any of the historic heritage items out the construction envelope (refer to Appendix 3 of infrastructure approval) 	<p>Section 6.4 and Table 6-1.</p> <p>Historic Heritage is addressed in the Historic Heritage Management Plan (HHMP)</p>
COA B23	<p>Prior to carrying out any activity that could harm heritage items, the Proponent must:</p> <ul style="list-style-type: none"> (a) Salvage and relocate all heritage items identified for salvage and relocation to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010); (b) Undertake archival recording, test excavation and/or salvage of the historic items listed in Table 5 and Table 7 of Appendix 3 (of infrastructure approval) if these items are to be affected by the development. 	<p>Section 6.1 and Appendix B</p> <p>Historic Heritage is addressed in the HHMP</p>
COA B24	<p>Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Appendix 3, the Proponent must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) Be prepared in consultation with Heritage Council, Heritage NSW, NPWS and Aboriginal Stakeholders; (b) Include a description of the measures that would be implemented for: 	<p>This plan</p> <p>Consultation is summarised in Section 3 and Appendix A.</p> <p>Mitigation measures are addressed in Section 6</p> <p>Historic Heritage (including R56 and R120) is</p>

Reference number	Requirement	Document Reference
	<ul style="list-style-type: none"> i. Protecting the heritage items identified in Table 1 of Appendix 3, including fencing off the heritage items (where required) prior to carrying out any development that could harm the heritage items, and protecting any items located outside the approved construction envelope; ii. Salvaging and relocating the heritage items identified in condition B23; iii. Where impacts cannot be avoided to R56 and R120, details of the proposed archaeological research design and excavation methodology, and findings of the Final Archaeological Excavation Report, in accordance with the relevant Heritage Council guidelines; iv. Minimising and managing the impacts of the development on heritage items within the construction envelope, including a strategy for the long-term management of any heritage items or material collected during the test excavation or salvage works; v. A contingency plan and reporting procedure if: <ul style="list-style-type: none"> ▪ Heritage items outside the approved construction envelope are damaged; ▪ Previously unidentified heritage items are found; or ▪ Aboriginal skeletal material is discovered; vi. Ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and vii. Ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and <p>(c) Include a program to monitor and publicly report on the effectiveness of these measures and any heritage impacts of the development; and</p> <p>(d) Include a program to publish;</p> <ul style="list-style-type: none"> i. Any detailed archival records required under the conditions of this approval; and ii. The findings of any excavations and salvage works. <p>Following the Planning Secretary's approval, the Proponent must implement the Heritage Management Plan.</p>	<p>addressed in the HHMP</p> <p>Unexpected finds plan is provided in Appendix C</p> <p>Contingency plan and reporting is addressed in Section 7.4</p> <p>Training is addressed in Section 7.2</p> <p>Monitoring is addressed in Section 7.3</p> <p>Salvage is addressed in Section 6.1 and Appendix B</p> <p>Ongoing consultation with Aboriginal stakeholders addressed in Section 6.7</p> <p>A program to monitor and publicly report on the effectiveness of these measures and any heritage impacts of the development is outlined in Table 6-1, Section 7.3, 7.4 and 7.5 of this plan.</p> <p>Archival records and findings of excavations are addressed in the HHMP.</p> <p>The findings of salvage works will be published as outlined in Section 6.1 and Appendix B of this plan.</p>
COA C2	The Proponent must review and, if necessary, revise the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary within 3 months of the:	Section 8.2

Reference number	Requirement	Document Reference
	<ul style="list-style-type: none"> (a) The submission of an incident report under condition C7; (b) The submission of an Independent Audit under condition C10; (c) The approval of any modification of the conditions of this approval; or (d) The issue of a direction of the Planning Secretary under condition A2 which requires a review. 	
COA C3	<p>With the approval of the Planning Secretary, the Proponent may:</p> <ul style="list-style-type: none"> (a) Prepare and submit any strategy, plan or program required by this approval on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan, or program); (b) Combine any strategy, plan or program required by this approval (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) Update any strategy, plan or program required by this approval (to ensure the strategies, plans and programs required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development). <p>If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this approval.</p> <p>If approved by the Planning Secretary, updated strategies, plans, or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan, or program.</p> <p>If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this approval if those requirements are not applicable to the particular stage.</p>	Section 8
COA C7	<p>The Department and the NPWS must be notified via the Major Projects website portal immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 5.</p>	Section 7.4

Reference number	Requirement	Document Reference
COA C8	The Planning Secretary and the NPWS must be notified in writing via the Major Projects website portal within seven days after the Proponent becomes aware of any non-compliance.	Section 7.4
COA C9	A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Section 7.4
COA C10	Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.	Section 7.5
Mitigation measures		
AH1	Where possible, impacts to identified Aboriginal sites will be avoided.	This plan and Section 6
AH2	<p>A CHMP and accompanying unexpected finds procedure will be prepared, to guard against inadvertent impacts to Aboriginal objects during construction. The CHMP will specify that Project works will be restricted to the disturbance area. It will include provisions to ensure workers are made aware of cultural heritage places and their value, for example through project inductions. The CHMP will include provisions to guard against indirect impact to AHIMS# 56-6-0477 to provide a method to manage potential heritage constraints and unexpected finds during construction.</p> <p>The long-term storage of any recovered Aboriginal objects will be developed during the completion of the CHMP, in consultation with the RAPs, but is likely to include (in preferential order):</p> <ul style="list-style-type: none"> • Re-burial on site, in an appropriate location in the vicinity of the Project • Lodged with a RAP under a Care and Control Agreement 	This plan Section 6

Reference number	Requirement	Document Reference
	<ul style="list-style-type: none"> Deposition with the Australian Museum. 	
AH3	<p>Salvage collection of surface artefacts will be carried out prior to construction, at ST PAD 01 and ST PAD 02, ST PAD 03, Str5 AS, AHIMS# 56-6-0540, and AHIMS# 56-6-0048 and AHIMS# 56-6-0477 (if required) with the RAPs. Surface collection will be undertaken using the following method:</p> <ul style="list-style-type: none"> Artefact collection will be undertaken by a team comprising an archaeologist and RAP representatives Artefact locations will be marked on the ground and recorded with a hand-held GPS (or equivalent) prior to collection Collected artefacts will be catalogued on site by the team, with recorded attributes as listed for the test excavation analysis Artefacts will be placed in individual bags, labelled with location information Following the completion of the surface collection program, a brief report would be prepared which outlines the results of the program. 	<p>Section 6.1</p> <p>Appendix B</p>
AH4	<p>In the event that a site or artefact (as defined by the NPW Act or Heritage Act) is identified during construction works, works will cease at the location and no further harm to the object will occur. The find will be immediately reported to Transgrid, and the regulator in accordance with legislation. No work will commence in the vicinity of the find until any required approvals have been given by the regulator. In the event that skeletal remains are encountered during the activity, works must stop immediately, the area secured to prevent unauthorised access and Transgrid, NSW Police and Heritage NSW contacted.</p>	<p>Section 6.6</p> <p>Section 7.4.2 and 7.4.3</p> <p>Appendix C</p>
AH5	<p>If changes are made to the Project to include impacts outside the disturbance area, further archaeological investigation will must be conducted.</p>	<p>Section 6</p> <p>Table 6-1.</p>

The Aboriginal heritage item referred to in Table 4 of Appendix 3 of the COA, which are referred to in B22, that are to be avoided by the development are listed below in Table 2-2 for easy reference. No harm must occur to this Aboriginal heritage site.

Table 2-2 Aboriginal heritage items listed in Appendix 3 to be avoided.

Item Name	COA Requirements
AHIMS ID 56-6-0041	Avoid Impacts

The Aboriginal heritage item referred to in Table 5 of Appendix 3 of the COA, which are referred to in B23, that are to be subject to salvage and relocated prior to activity occurring by the development are listed below in Table 2-3 for easy reference.

Table 2-3 Aboriginal heritage items listed in Appendix 3 to be salvaged

Item Name	Archaeological significance	COA Requirements
ST PAD 01 (which incorporates the previously recorded AHIMS 56-6-0009, 56-6-00495, 56-6-0496 and 56-6-0497)	Low	Salvage collection of surface artefacts
ST PAD 02	Low	Salvage collection of surface artefacts
ST PAD 03	Low	Salvage collection of surface artefacts
STr5 AS	Low	Salvage collection of surface artefacts
AHIMS ID 56-6-0540	Low	Salvage collection of surface artefacts
AHIMS ID 56-6-0048	Low	Salvage collection of surface artefacts
AHIMS ID 56-6-0477	Low	Salvage collection of surface artefacts

As noted in Section 4.2 below, in addition to the archaeological significance for each site there are associated cultural significance values stemming from a feeling of custodianship of the sites and objects within the Project Area. While the land broadly holds social, spiritual and cultural values to date no information regarding the degree of cultural significance of the specific sites has been provided by the Aboriginal community.

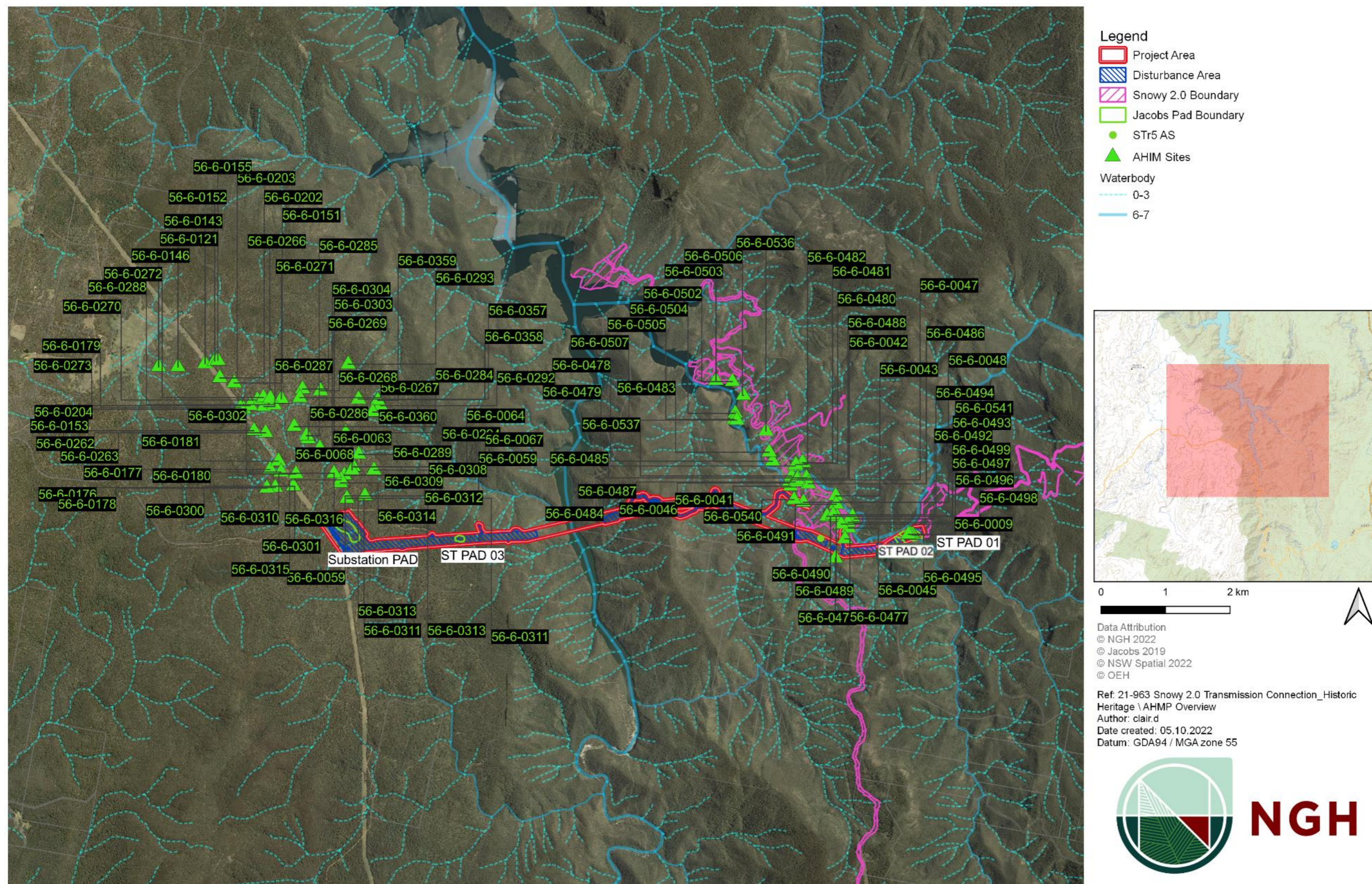


Figure 2-1 Aboriginal heritage items within the broader Snowy 2.0 Project context

3 CONSULTATION

In accordance with Condition B24 of the COA, the AHMP is to be prepared in consultation with the National Park and Wildlife Service (NPWS), Heritage Council, Heritage NSW and Registered Aboriginal Parties (RAPs). Heritage Council is not relevant to this AHMP and consultation has been undertaken with them as part of the HHMP. Transgrid will initiate and facilitate this consultation.

3.1 ABORIGINAL CONSULTATION

The Snowy Mountains is Country to several groups and many Aboriginal people have cultural and spiritual associations that have long histories embodied in objects which can be seen on the ground and other intangible values related to the past and current concerns and aspirations. The Project area itself is located within the lands of the Wolgalu people.

A formal process of Aboriginal community consultation has been conducted as a component of assessment of heritage impacts (as documented in the ACHA and Addendum ACHA) in accordance with the guidelines as set out in the NSW OEH's Aboriginal cultural heritage consultation requirements for proponents 2010 (NSW DECCW 2010b).

This AHMP was provided to the RAPs for comment. The consultation log and how comments have been addressed in this AHMP are outlined in Appendix A.

The RAPs for this Project are:

- | | |
|--|--|
| • Buru Ngunawal Aboriginal Corporation | • Murra Bidgee Mullangari |
| • Didge Ngunawal Aboriginal Corporation | • Ngarigo Elders |
| • Griffiths Skills Training Centre and Ngumbaay Indigenous Corporation | • Ngunawal Consultancy |
| • Gunjeewong Cultural Heritage Aboriginal Corporation | • Snowy Mountains Indigenous Elders Group |
| • Koomurri Ngunawal Aboriginal Corporation | • Ms Shirley Marlowe |
| • Ms Janine Thompson | • Mr Matthew Marlowe |
| • Ms Janice Williams | • Mr Lawrence Marlowe |
| • Ms Megan Considine | • Mr Ron Grovenor |
| • Merrigarn Indigenous Corporation | • Walgalu Elder, Ms Alice Williams |
| • Muragadi Heritage Indigenous Corporation | • Yurwang Gundana Consultancy Cultural Heritage Services |
| | • Brungle-Tumut Local Aboriginal Land Council |

A draft version of this AHMP was provided to the RAPs for comment. Four RAPs (Brungle-Tumut Local Aboriginal Land Council, Murra Bidgee Mullangari, Ngunawal Aboriginal Corporation and Ngumbaay Indigenous Corporation) provided comments on the draft plan, which have been addressed in this revision. The consultation log and how comments have been addressed in this AHMP are outlined in Appendix A.

3.2 ONGOING ABORIGINAL CONSULTATION

Consultation with the RAPs would be ongoing during the life of the Project. A log of consultation will be kept by the Transgrid (and UGL where relevant). Consultation with the RAPs will generally be provided in writing via Teambinder (or emails) as required. This consultation would include, but not be limited to:

- Consultation in regard to processes and strategies as outlined in this AHMP.
- Participation in the implementation of certain management and mitigation measures for heritage items including the conduct of test and salvage excavations.
- Ensuring that Aboriginal stakeholders are able to have reasonable access to cultural heritage sites located in the Project designated area. The process to obtain access will entail Aboriginal stakeholders making the request for access to the Transgrid Project manager. Transgrid will then facilitate access construction site with UGL. The Aboriginal stakeholders will be taken into the construction site by UGL.
- Consultation in the event of any unexpected or undocumented Aboriginal cultural heritage values/objects or burials being found during the construction of the Project.
- Recovered artefacts will be handed over to RAPs at the time of salvage with due process, or provided to Transgrid for temporary storage. Consultation will be managed accordingly within six months of the salvage works taking place.

3.3 HERITAGE NSW

This AHMP was provided to Heritage NSW on 17 October 2022 for comment. Heritage NSW responded on 14 November 2022, outlining they were satisfied the plan had been developed in line with the Conditions of Approval issued for the Project. Eight minor corrections and suggestions were provided and have been addressed in this plan.

3.4 NPWS

This AHMP was provided to NPWS on 17 October 2022 for comment. NPWS responded on 14 November 2022 provided comments, which have been addressed in this plan.

4 EXISTING HERITAGE

The Aboriginal Heritage in the Project area was recorded during the preparation of the Project's EIS (Jacobs 2021b), ACHA (Jacobs 2021a) and Addendum ACHA (Jacobs 2021c). The summary of the existing heritage below comes from these three reports.

4.1 ENVIRONMENTAL AND CULTURAL CONTEXT

The Project area is within the Country of the Walgal people (also spelled Walgalu, Wolgal), whose lands occupied the northern part of the Australian Alps, near Kiandra, now referred to as Kosciuszko National Park.

Aboriginal occupation of the Australian Alps is represented in the region's archaeological record, and in the cultural knowledge of the Aboriginal population. These provide information on a network of pathways, ceremonial practices and sites, and the practice of moth hunting, which together make up a unique cultural complex. The landscape, and places within it, are connected with this cultural complex and consequently with its heritage value.

An examination of environmental factors, and of cultural and spiritual practices associated with the Project area reinforces the importance of the Snowy Mountains to local Aboriginal groups and demonstrates the presence of varying amounts of Aboriginal archaeological material. The archaeological record within the region includes a variety of site types such as occupation sites in the open and in rock shelters, as well as culturally modified trees, quarries, ceremonial places and burials.

4.2 CULTURAL HERITAGE VALUES OF THE PROJECT AREA

Apart from archaeological sites, there are no places where specific Aboriginal cultural heritage values have been identified during consultation for the Project and from the Aboriginal cultural heritage reports, either within or in the immediate vicinity of the Project area.

During consultation undertaken to date for the Project, it was repeatedly expressed by the RAPs that the area was a meaningful place to the local Aboriginal communities, that there was a feeling of custodianship of the sites and objects within the Project area and that the land holds specific social, spiritual and cultural values. It was expressed by representatives of the Snowy Mountains Indigenous Elders Group and the Brungle-Tumut Local Aboriginal Land Council (BTLALC) that people had lived in the area for thousands of years, and that the high ridges, rock shelters, confluence of creeks, rivers and permanent water sources are highly significant parts of the Aboriginal landscape.

4.3 ABORIGINAL HERITAGE INFORMATION MANAGEMENT SYSTEM

An extensive search of the Aboriginal Heritage Information Management System (AHIMS) database which is maintained by Heritage NSW was undertaken for the initial ACHA on 21st September 2020. The AHIMS search returned 101 previously recorded sites within and near the Project area. Of these, five registered sites were noted to be located within the Project area. All five of these sites are also within the disturbance area. Four of these AHIMS sites are within a Potential Archaeological Deposit (PAD), ST PAD 01. These sites are surface scatters of stone artefacts which are described in Table 4-1 and shown in Figure 4-1 and Figure 4-2. Another site (AHIMS # 56-6-0041) is located about 27 metres north from the approved Project disturbance area.

Table 4-1 Summary of AHIMS sites within the Project disturbance area

AHIMS ID	Site name	Site features	Site type	Distance from disturbance area
56-6-0009	Ravine; Lobs Hole KNP91-59	Artefact	Open Camp Site	Within disturbance area and PAD (ST PAD 01)

AHIMS ID	Site name	Site features	Site type	Distance from disturbance area
56-6-0477	Ravine SU17/L1	Artefact	Artefact Scatter	Within disturbance area
56-6-0495	Ravine SU3/L1	Artefact	Artefact Scatter	Within disturbance area and PAD (ST PAD 01)
56-6-0496	Ravine SU3/L2	Artefact	Artefact Scatter	Within disturbance area and PAD (ST PAD 01)
56-6-0497	Ravine SU3/L3	Artefact	Artefact Scatter	Within disturbance area and PAD (ST PAD 01)

4.4 PREVIOUS ARCHAEOLOGICAL SURVEYS

In addition to the AHIMS search, a review of the previous archaeological assessments within and around the Project area was completed. The most relevant archaeological assessment to the Project area is Dibden's (2018) archaeological survey, and subsequent test excavations (Dibden 2019), which examined Lobs Hole Ravine, Talbingo Reservoir and the Mine Trail Road. These survey and test excavation areas overlap with the Project area and provided the location of Aboriginal cultural heritage sites and artefacts which had been previously recorded. The work of Dibden (2019) at Lobs Hole Ravine provided significant information which was noted to influence the understanding of the archaeology of the Project area. During the previous test excavations reported on by Dibden (2019) within Lobs Hole Ravine, 151 test pits were excavated, with 45 of these test pits occurring within the Project area. These test excavation areas were chosen by Dibden as a result of previous archaeological survey of the area which identified locations of moderate/high archaeological potential. The artefacts which were recovered from the test excavation undertaken by Dibden (2019) were widely distributed in a subsurface context. Artefact densities ranged from very low to relatively high throughout the area. The types of artefacts retrieved were pieces of flaked stone representing debitage, along with cores and retouched artefacts. The artefacts were dominated by stone material which was locally sourced, such as tuff and quartz. Dibden (2019) concluded that Lobs Hole Ravine contained stone artefacts across the whole study area, with mean artefact density calculated to be 51 artefacts / m². Due to the variable densities of artefacts in the area (relatively low in some areas, and high in others) Lobs Hole Ravine is interpreted to have been utilised for relatively intensive Aboriginal occupation. Lobs Hole Ravine provides an environment that is sheltered from the elements and is atypical of the surrounding region in this respect.

4.5 ARCHAEOLOGICAL SURVEYS AND SIGNIFICANCE ASSESSMENT

A series of archaeological surveys of the Project area were completed from March 2018 to October 2019 as part of the EIS and ACHA, which resulted in the identification of four areas of PAD:

- ST PAD 01, which encompasses the previously recorded sites AHIMS ID 56-6-0009, 56-6-00495, 56-6-0496 and 56-6-0497.
- ST PAD 02 (site card lodged during EIS process).
- ST PAD 03 (site card lodged by Transgrid 1/08/2023).
- Substation PAD.

An archaeological test excavation program was completed in October 2019 at ST PAD 03 and Substation PAD. ST PAD 01 and ST PAD 02 were not subject to test excavations as both areas were located within the Snowy 2.0 Project area, which was an active construction site during the time of the

archaeological excavations. In addition, the Snowy 2.0 area was the subject of a separate archaeological assessment completed by Dibden (2018; 2019). The results of the test excavations at ST PAD 03 and Substation PAD were incorporated into the ACHA report and the significance of ST PAD 01 and ST PAD 02 was assessed based on the findings of Dibden (2019) who completed a testing program in a similar landform. The Substation PAD was found not to be an Aboriginal site as no Aboriginal objects were recovered from the test excavation undertaken. The results of the initial ACHA are shown in Figure 4-1.

Post exhibition of EIS and ACHA, the Project design was updated and in response to Heritage NSW submission which required that further test excavations occur onsite within areas of PAD (ST PAD 01 and ST PAD 02) which were not subject to testing as part of the assessment of the proposed works for this Project. Given these comments from Heritage NSW additional test excavations as required were completed in August 2021 at ST PAD 01 and ST PAD 02 to provide a more detailed assessment of the archaeological significance of these areas. Test excavations were also planned for Str5 PAD, however based on the findings at ST PAD 01 and ST PAD 02 and in consultation with Heritage NSW, it was determined that this was not required. Str5 PAD was reassessed as a surface artefact scatter, henceforth referred to Str5 AS. Heritage NSW also noted that the track atop Sheep Station Ridge was not assessed appropriately and that additional investigations of the area would be required to identify and assess Aboriginal heritage if impacts were unable to avoid this area. Jacobs noted that this area was not assessed as it could not be accessed and that once access is established it will be surveyed. However, as part of the proposed amendments, Sheep Station Ridge was noted to be avoided and as a result no further investigation occurred at Sheep Station Ridge (Jacobs 2021c). If future works are proposed in Sheep Station Ridge additional assessment would likely be required prior to approvals of any modification based on the previous advice provided by Heritage NSW.

Table 4-2 outlines the sites which were noted to be impacted by the design change and results of the scientific/archaeological significant assessment following further test excavations undertaken onsite (Jacobs 2021c). These sites are shown on Figure 4-2.

Table 4-2 Summary of significance for the Aboriginal sites within the Project disturbance area

Site name	Site type	Significance and additional detail
ST PAD 01 (which incorporates the previously recorded AHIMS 56-6-0009, 56-6-00495, 56-6-0496 and 56-6-0497)	Artefact scatter and PAD	Low archaeological significance The site is a low density, artefact scatter of low archaeological integrity. As a result, the site has a low potential for future research or educational value. The artefacts retrieved from the site are considered to be common within the regional and local context. As a result, the artefacts are not considered to be rare or particularly representative of unique artefact types.
ST PAD 02	Artefact scatter and PAD	Low archaeological significance The site is a low density, artefact scatter of low archaeological integrity. As a result, the site has a low potential for future research or educational value. The artefacts retrieved from the site are considered to be common within the regional and local context. As a result, the artefacts are not considered to be rare or particularly representative of unique artefact types.
ST PAD 03	Artefact scatter and PAD	Low archaeological significance

Site name	Site type	Significance and additional detail
		This site is a low-density assemblage of quartz cores and unretouched flakes. Nine artefacts were identified within this PAD, seven of which were identified on the ground surface, and two of which were recovered from test pits.
Str5 AS	Artefact scatter	<p>Low archaeological significance</p> <p>The site is a low density, surface artefact scatter of low archaeological integrity. As a result, the site has a low potential for future research or educational value. The artefacts retrieved from the site are considered to be common within the regional and local context. As a result, the artefacts are not considered to be rare or particularly representative of unique artefact types.</p>
AHIMS# 56-6-0540	Artefact scatter	<p>Low archaeological significance</p> <p>The site is a low density, surface artefact scatter of low archaeological integrity. As a result, the site has a low potential for future research or educational value. The artefacts retrieved from the site are considered to be common within the regional and local context. As a result, the artefacts are not considered to be rare or particularly representative of unique artefact types.</p>
AHIMS# 56-6-0048	Artefact scatter	<p>Low archaeological significance</p> <p>The site was identified and recorded in 1991 as a surface artefact scatter that had been subject to erosion. The site recording form available on the AHIMS database does not include maps, photographs, or descriptions of the artefact assemblage. The location of the site had been surveyed during the preparation of the ACHAR (Jacobs 2020) and could not be located. It is likely that ongoing erosion has resulted in the movement of the artefacts from their recorded location and the site has been destroyed through nature processes. As a result, the site is considered to be of low scientific value.</p>
AHIMS# 56-6-0477	Artefact scatter	<p>Low archaeological significance</p> <p>This previously recorded site could not be found during the archaeological survey undertaken by Jacobs (2021a). Significance and details were taken from Dibden (2018). This previously recorded site (Dibden 2018: 103) was documented as a scatter of four flakes, all made of tuff, in a bare rocky area on a flat crest. The site was assessed as having no potential for subsurface archaeological deposits.</p>

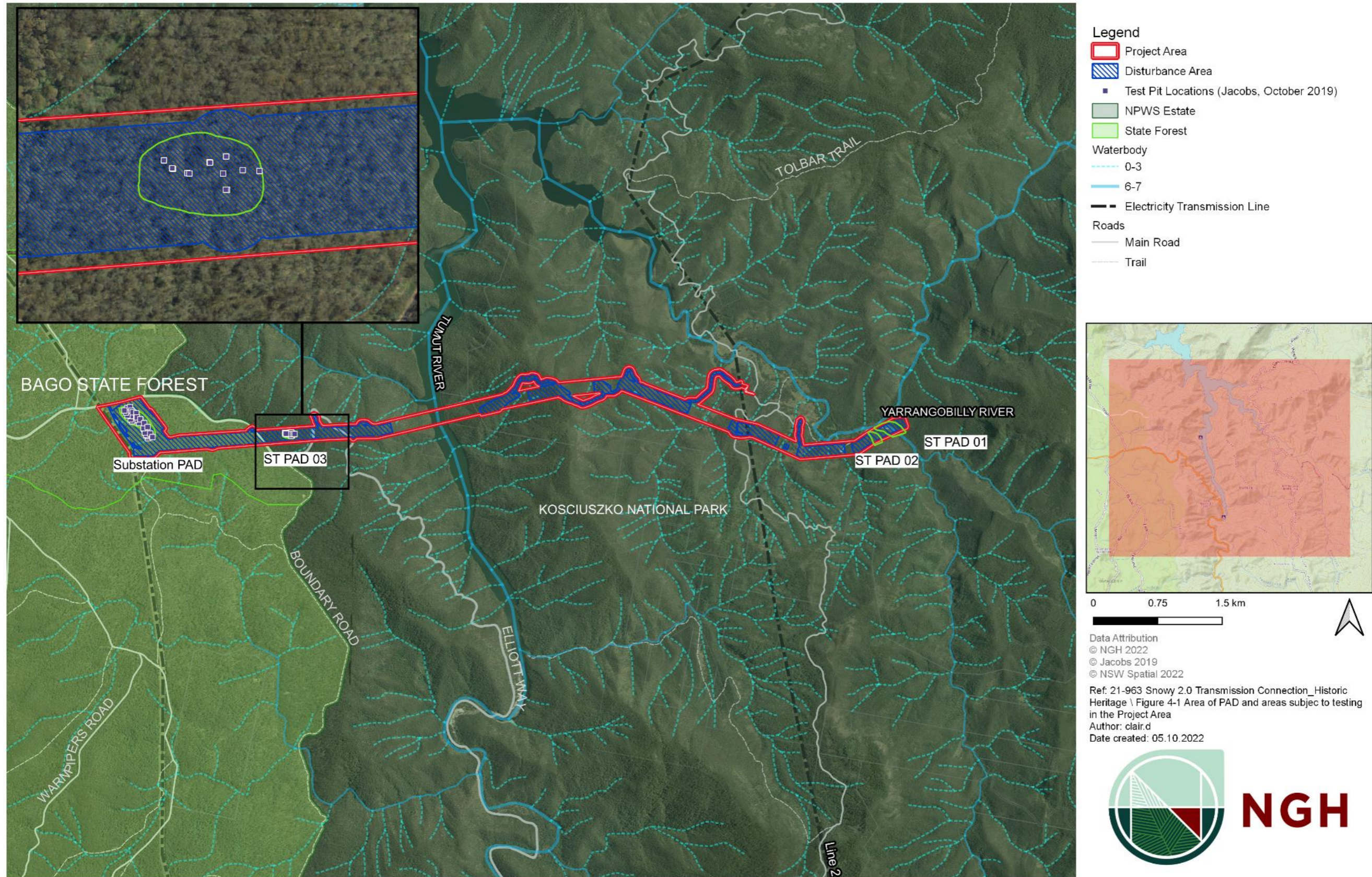


Figure 4-1 Area of PAD and areas subject to testing in the Project Area as noted in the initial ACHA

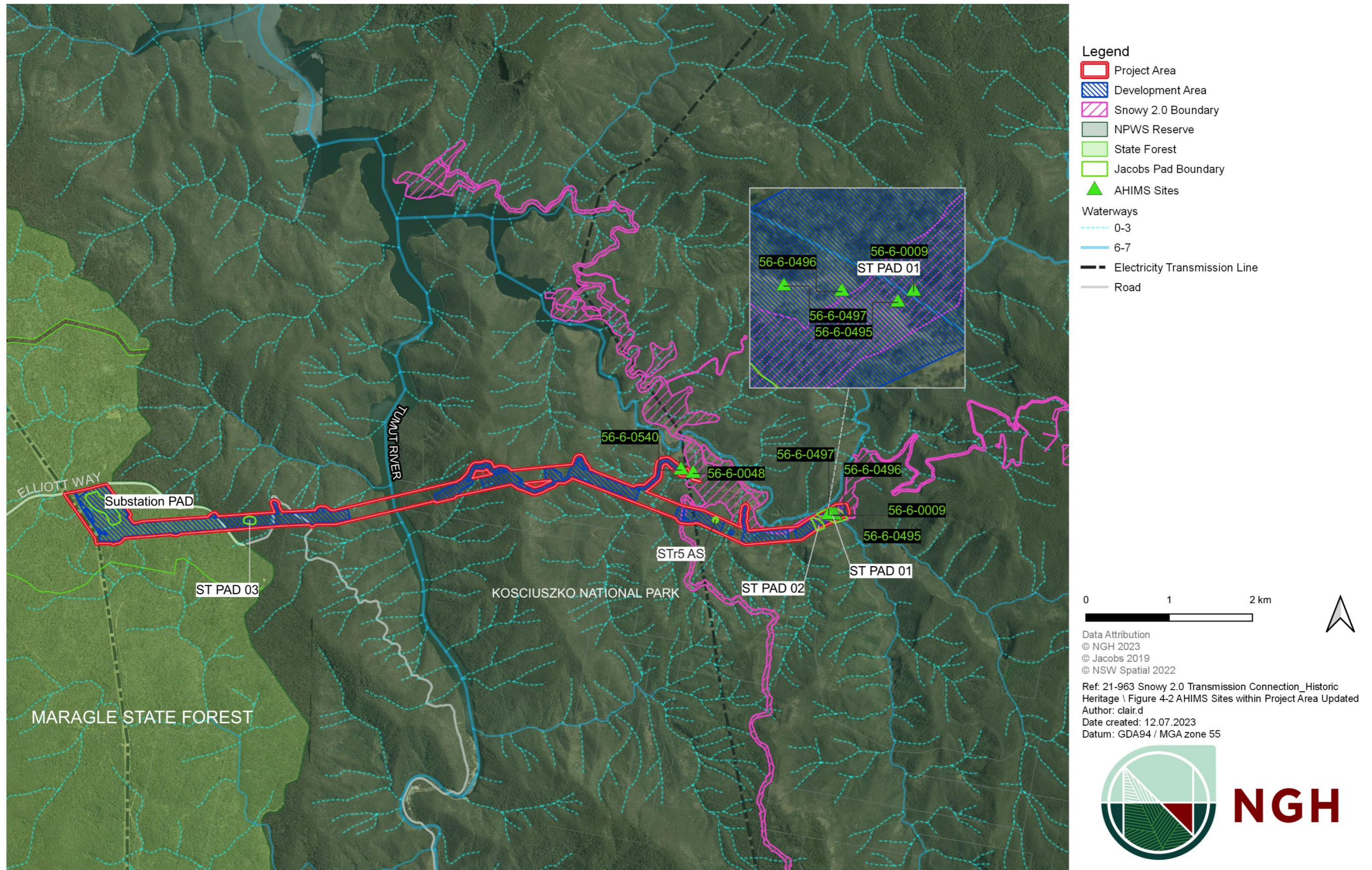


Figure 4-2 Aboriginal cultural heritage sites within Project area as noted in the Addendum ACHA for the revised site extent

5 ENVIRONMENTAL ASPECTS AND IMPACTS

5.1 CONSTRUCTION ACTIVITIES

Key aspects of the Project that could result in adverse impacts to Aboriginal cultural heritage includes ground disturbance and vegetation clearance for the following key Project components:

- Construction of the new substation
- Construction of new and upgrades access tracks
- Construction of new transmission lines
- Temporary stockpile sites
- Temporary compound sites
- Landscaping/revegetation

Refer also to the Aspects and Impacts Register included in Appendix F of the CEMP.

5.2 ABORIGINAL HERITAGE IMPACTS

Construction of the Project will result in impacts on seven Aboriginal cultural heritage sites. Potential impacts and management for each of these sites is outlined in Table 5-1. AHIMS# 56-6-0041 will not be impacted by the works and measures to ensure its avoidance are included Section 6.

Table 5-1 Potential impacts to Aboriginal sites in the Project area and management

Site name	Site type	Type of harm	Degree of harm	Consequence of harm	Notes	Management
ST PAD 01 (which incorporates the previously recorded AHIMS 56-6-0009, 56-6-00495, 56-6-0496 and 56-6-0497)	Artefact scatter and PAD	Direct	Partial	Partial loss of value	Potentially impacted or salvaged during Snowy 2.0 Main Works.	Salvage collection of surface artefacts
ST PAD 02	Artefact scatter and PAD	Direct	Partial	Partial loss of value	Potentially impacted or salvaged during Snowy 2.0 Main Works.	Salvage collection of surface artefacts
ST PAD 03	Artefact scatter	Direct	Total	Total loss of value		Salvage collection of

Site name	Site type	Type of harm	Degree of harm	Consequence of harm	Notes	Management
	and PAD					surface artefacts
Str5 AS	Artefact scatter	Direct	Partial	Partial loss of value		Salvage collection of surface artefacts
AHIMS# 56-6-0540	Artefact scatter	Direct	Total	Total loss of value	Salvaged as part of Snowy 2.0 Main Works	Salvage collection of surface artefacts
AHIMS# 56-6-0048	Artefact scatter	Direct	Total	Total loss of value		Salvage collection of surface artefacts
AHIMS# 56-6-0477	Artefact scatter	Indirect	Partial	Partial loss of value	Site could not be re-found during the archaeological survey conducted for this Project.	Salvage collection of surface artefacts
AHIMS# 55-6-0041	Artefact scatter	None	None	No loss of value		Avoid

6 ENVIRONMENTAL MITIGATION AND MANAGEMENT MEASURES

6.1 SALVAGE COLLECTION

Salvage collection of surface artefacts will be carried out prior to construction for the following sites if they are unable to be avoided by works:

- ST PAD 01
- ST PAD 02
- ST PAD 03
- Str5 AS
- AHIMS# 56-6-0540 (if required, salvaged during Snowy 2.0 Main Works)
- AHIMS# 56-6-0048
- AHIMS# 56-6-0477 9 (if required).

The salvage collection methodology is outlined in Appendix B.

The findings of any salvage works will be reported on with a copy of the report provided to all RAPs and Heritage NSW. As per condition B24d of the Project approval, a summary of the salvage works not requiring Planning Secretary approval, will be appended to this plan within 12 months of the salvage works being undertaken.

6.2 TEMPORARY/SHORT TERM STORAGE OF SALVAGED ARTEFACTS

The objects recovered from the salvage program, which is required to be undertaken prior to any development works, may be provided to the RAP present with due processes, or be temporarily held at a Transgrid-managed secure locked cabinet within the Project area. Objects may also be stored at the office of the Project Archaeologist in a locked cabinet for analysis and recording until an appropriate time that it can be arranged for them to be relocated within the Project area. Upon receipt from Jacobs or Project Archaeologist, artefacts will be safekept within a secure locked cabinet within the Project area managed by Transgrid.

As part of the ACHA (Jacobs 2021a) and Addendum ACHAR (Jacobs 2021c), subsurface test excavation was undertaken. All artefacts recovered from the subsurface test excavation program for this Project are currently in temporary care in a locked cabinet by Jacobs. All objects recovered from the previous subsurface test excavation and surface collection salvage program may be temporarily held together in a secure locked cabinet within the Project area and/or at the office of the Project Archaeologist, until an appropriate time that it can be arranged for them to be relocated within the Project area. Any requests by the relevant Registered Aboriginal Parties to look after the artefacts recovered will be considered and advised to the Proponent. A Care and Control Agreement may be established to consolidate this agreement.

The temporary storage of salvaged objects, if required, is not intended to exceed beyond 24 months from the conclusion of the salvage program.

6.3 LONG TERM MANAGEMENT AND RELOCATION OF SALVAGED ARTEFACTS

The long-term storage of the Aboriginal objects recovered from the testing and salvage works for this Project will be developed during the completion of this plan in consultation with the RAPs, but is likely to include (in preferential order):

- Re-burial on site, in an appropriate location outside the proposed disturbance area.
- Lodged with the RAP a Care and Control Agreement, if not undertaken during salvage.

The relocation/s of the cultural material salvaged and those previously recovered from the subsurface testing program (which are currently in temporary care of Jacobs) would need to be agreed with by the NPWS (Landowner), State Forest (Landowner), Transgrid, UGL, Project Archaeologists and/or RAPs and be outside the proposed disturbance area. The site/s for the relocation of salvaged cultural material would be noted by the submission of site cards to the AHIMS as legally required within 1 month from the reburial/relocation of the salvaged Aboriginal objects.

An Aboriginal Site Impact Recording Form (ASIRF) must be completed and submitted to AHIMS following harm for each site collected or destroyed from salvage and/or construction works. Representative from the RAPs would be provided with the opportunity to assist the Project Archaeologist with the salvage program and the relocation of the salvaged objects. The ASIRF is available from <https://www.environment.nsw.gov.au/resources/cultureheritage/aboriginal-site-impact-recording-form-120558.pdf>. Generally, a minimum of two representatives would be invited to participate in the salvage program and the relocation of the salvaged objects. If Aboriginal representatives are available to participate in the relocation of the Aboriginal salvaged objects, they will be offered the opportunity or invited to conduct a ceremony (i.e. smoking) for the relocation site and artefacts if it is safe to do so. It is noted that a smoking ceremony would only be able to occur if agreed to by the NPWS (Landowner), State Forest (Landowner), Transgrid and UGL and would be subject to any required safety protocols. If representatives from the RAPs are not available to participate, and all reasonable opportunities have been afforded to facilitate this participation, the relocation of the salvaged cultural material which would be returned to Country would continue as scheduled with the Project Archaeologist. The selection of representatives from the RAP to participate in the relocation would be as selected by the construction contractor, Project Owner and/or Transgrid pending contract agreements to facilitate the payment of RAP participation in this work.

Following the relocation of any Aboriginal cultural heritage material within the project boundary, the exact location/s will be notified to Transgrid and UGL who will immediately set up a 50 m exclusion zone to protect the material during the construction and operation phases of the Project. Following the relocation of salvaged Aboriginal cultural heritage material and any previously recovered material from the test excavation program, the mapping within the AHMP would be updated to show and/or include the relocation site/s. It is intended that this would occur within three (3) months of the relocation of sites. A minimum 5 m buffer zone is required to be placed and delineated around the artefact relocation site/s to ensure they won't be impacted into the future.

As an alternative long term management option it may be requested by the RAPs that the entirety, portion or even a single object may be suitable to be held under a Care Agreement sought under Section 85A of the *National Parks and Wildlife Act 1974*. However, as no RAPs responded to the heritage assessments for this Project to date suggesting they would like to enter into a Care and Control agreement or for the use of items under a Care and Control agreement to be used for training and educational purposes within the local Aboriginal community. This option, though unlikely to occur, has the provision to occur if determined to be appropriate by the Aboriginal community.

Additionally, while it was noted in the heritage assessments for the Project that one option of long-term management is the deposition of Aboriginal objects with the Australian Museum, we are aware that the Australian Museum no longer encourages or facilitates this option due to the volume of material in storage and therefore this option is not considered to be viable for this plan. It is generally in line with the wishes of the RAPs that all cultural material is returned to Country and the deposition of Aboriginal objects with the Australian Museum is not in line with the approach.

6.4 PROTECTION OF ABORIGINAL HERITAGE SITES

The boundaries of the Project disturbance area will be clearly marked with fencing to ensure that no impacts can occur to Aboriginal cultural heritage sites that may be located outside of the areas of approved works. Aboriginal cultural heritage sites within the Project area that are not to be disturbed will

be demarcated (by UGL and Transgrid) using blue barricading or bunting and signed as 'No-Go Zones'. These 'No Go' exclusion zones will be in place for the duration of construction.

Specifically AHIMS#56-6-0041 will not be impacted by the works and marked as a 'No-Go Zone'. The fencing of the Aboriginal sites which are not approved to be impacted will be undertaken a minimum of 7 days prior to any construction works occurring.

Where blue flagging will be used to delineate protected areas from areas approved for construction and land disturbance, 'No Go' signage will clearly signify which side is to be protected i.e. signs will face towards / be readable by operators of oncoming clearing equipment and plant.

Heritage checks will be undertaken as part of the Permit to Excavate (PTE) process during construction. This process is integral to communicate the distinction between heritage sites which must be avoided and the ground disturbance footprints in which construction contractors will be working. The PTE process will be managed by the Health, Safety and Environment (HSE) Manager and/or the Site Environmental Advisor (SEA).

6.5 HERITAGE INDUCTIONS

To ensure that this AHMP is effectively implemented, each level of management is responsible for ensuring that all personnel reporting to them are aware of the requirements of this plan.

All contractors and staff involved in construction activities on site will undergo site induction training (or be supervised by a staff member that has had the relevant training) relating to Aboriginal cultural heritage management issues. The induction training will address elements related to Aboriginal cultural heritage management including:

- Existence and requirements of this management plan.
- Relevant legislation.
- Roles and responsibilities for Aboriginal cultural heritage management.
- Location of identified Aboriginal cultural heritage sites and 'No-go Zones'.
- Proposed Aboriginal cultural heritage management and protection measures.
- Procedure to follow in the event of an unexpected Aboriginal cultural heritage item find or discovery of human remains during construction works (refer to Appendix C).
- Aboriginal culture awareness training for all relevant staff and contractors. This induction will include information about the Aboriginal culture and history of the locality, the location of sites and items that require protection, Aboriginal cultural heritage management measures and protocols, and legal obligations. This training will be developed in consultation with the RAPs and provided to relevant staff before commencing work on-site.

The HSE Manager will coordinate the environmental training in conjunction with other training and development activities (e.g. safety). A record of this training will be maintained by the HSE Manager.

All training will be undertaken and records kept in accordance with the COA B24 (vi) which notes the requirement to ensure workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions.

Training records for all contractors and staff involved in breaking ground activities will be kept and maintained in a register detailing names, dates, content and type of training undertaken. This AHMP must be kept on site at all times and be readily accessible. The requirements of the AHMP and the unexpected finds protocols should be incorporated into toolbox talks, and the mapping presented in this report should be reviewed and management measures assessed to ensure no impacts beyond the Project approval are likely to take place.

A refresher induction and/or additional training will be implemented following any incident that involves heritage. If future revision of the AHMP occurs consideration must be given as to whether a refresher induction and/or additional training will be undertaken.

6.6 UNEXPECTED FINDS

The possibility exists that Aboriginal artefacts or skeletal remains may be uncovered during ground disturbance, even in areas which have been cleared for Aboriginal cultural heritage. It is therefore imperative that operators remain vigilant when undertaking ground disturbance so as avoid disturbing any sub-surface objects or remains that may be present.

In the event that a site or Aboriginal object (as defined by the NPW Act) is identified during any works, works will cease at the location and no further harm to the object will occur. The find will be immediately reported to Transgrid, and Heritage NSW. No work will commence in the vicinity of the find until any required approvals have been given by Heritage NSW.

In the event that skeletal remains or suspected skeletal remains are encountered during the activity, works must stop immediately, the area secured to prevent unauthorised access and Transgrid, NSW Police and Heritage NSW contacted.

The procedure outlined in Appendix C must be followed for any unexpected finds.

6.7 UNDOCUMENTED SACRED SITES

The possibility exists that there may be more undocumented sacred sites within the Project area. Transgrid will secure the services of knowledgeable local Indigenous Elders to assist the Project during the vegetation clearing phase to ensure any sacred sites not currently identified in the previous studies of the Project area are found and protected.

UGL will advise Transgrid ahead of works their intended progress, and request a cultural heritage monitor (elder) engagement. Where required, Transgrid will arrange for such cultural heritage monitor attendance, and manage any potential issues arising.

6.8 HERITAGE CONTROL MEASURES

A range of mitigation requirements and control measures are identified in the EIS, Response to Submission and heritage assessments undertaken for the Project. Specific measures and requirements to address impacts to heritage values are outlined in Table 6-1. The measures have been listed to cover broad activities and as such there may be some repetition of mitigation measures.

Table 6-1 Aboriginal cultural heritage mitigation and management measures

ID	Measure/requirement	Resources needed	When to implement	Responsibility	Reference
General					
AHMP1	All reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, operation, rehabilitation, upgrading or decommissioning of the development.	This document	Pre-construction Construction Operation Decommissioning	Construction Manager	COA A1 AH1
AHMP2	Ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in the COA as sites to avoid impacting or other sites located outside the approved development footprint.	This document COA	Design Pre-construction Construction Operation Decommissioning	Construction Manager	COA B22
AHMP3	Implementation of the approved AHMP	This document	Pre-construction Construction	Construction Manager SEA	COA B24
AHMP4	A copy of the AHMP should be kept on site during construction and operation of the Project and be readily available for reference, if and as required.	This document	Pre-construction Construction	Construction Manager SEA Transgrid	Best practice
AHMP5	Training will be provided to all Project personnel, including relevant sub-contractors on Aboriginal heritage including the unexpected finds procedure and the	This plan	Pre-construction Construction	Construction Manager	COA B24

ID	Measure/requirement	Resources needed	When to implement	Responsibility	Reference
	requirements from this plan through inductions, toolboxes, and targeted training.	Induction package Toolbox training material Targeted training material		SEA	
AHMP6	A strategy for the long-term management of any items or material that are salvaged would be developed in consultation with the registered Aboriginal parties. The artefacts recovered during salvage collections would be reburied in a safe location within the Project area outside the disturbance footprint.	Strategy This plan	Pre-construction Construction	Project Archaeologist SEA	AH2 COA B24
AHMP7	Further archaeological assessment would be required if the Project changes to include impacts outside the disturbance area. This includes the track atop Sheep Station Ridge which has not been surveyed during assessment undertaken to date. A formal modification to the development consent would be required if any activity were proposed to extend beyond the area assessed and granted for development approval in the COA	Design drawings Addendum ACHA	Design Pre-construction Construction All post approval stages if required	Transgrid SEA	COA AH5
AHMP8	Consultation with Heritage NSW, and RAPs will be continued throughout the life of this Project.	Section 3	All Project stages	Transgrid SEA	COA B24
AHMP9	Aboriginal Heritage must be included within any major environmental audit for the Project	COA This plan	Pre-construction	Independent Auditor	COA C10

ID	Measure/requirement	Resources needed	When to implement	Responsibility	Reference
		Any appropriate reporting	Construction Operation	Project Manager	
Pre-construction					
AHMP10	The boundaries of the Project disturbance area will be clearly marked with blue fencing to ensure that no impacts can occur to Aboriginal cultural heritage sites that may be located outside of the areas	SAPs	Pre-construction Construction	Project Archaeologist SEA	COA B22 COA B24 AH2
AHMP11	Aboriginal cultural heritage sites within the Project area that are not be disturbed will be demarcated (by UGL and Transgrid) using blue barricading or bunting and signed as 'No-Go Zones'. These 'No-Go' exclusion zones will be in place for the duration of construction. The fencing of the Aboriginal sites which are not approved to be impacted will be undertaken a minimum of 7 days prior to any construction works occurring.	SAPs	Pre-construction Construction	Project Archaeologist SEA	COA B22 COA B24 AH2
AHMP12	AHIMS#56-6-0041 will not be impacted by the works and marked as a 'No-Go Zone'.	SAPs	Pre-construction Construction	Project Archaeologist SEA	AH2 COA B22 COA B24
AHMP13	Salvage collection of surface artefacts will be carried out prior to construction and/or activity commencing that could harm heritage items, at ST PAD 01, ST PAD 02, ST PAD 03, Str5 AS, AHIMS# 56-6-0540, AHIMS# 56-6-0048 and AHIMS# 56-6-0477. Salvage would be conducted by an archaeologist with representatives of the Registered Aboriginal Parties invited to participate.	Salvage methodology Appendix B	Pre-construction	Project Archaeologist SEA	AH3 COA B23 COA B24
AHMP14	An Aboriginal Site Impact Recording Form will be completed and submitted to AHIMS for any site harmed or destroyed from salvage and construction works. Artefact disposition and storage must be done in	Code of Practice	Pre-construction	Project Archaeologist	Code of Practice COA B23

ID	Measure/requirement	Resources needed	When to implement	Responsibility	Reference
	accordance with Requirement 26 of the Code of Practice (DECCW 2010:35-6).			SEA	
AHIMP15	Any salvaged objects and the material recovered from the previous test excavation program for the Project are to be relocate to a suitable alternative location/s in accordance with the Code of Practice, COA and located outside the development footprint.	Code of Practice Heritage reports AHMP COA	Pre-construction Construction	Construction Manager SEA	COA B23 COA B24 Code of Practice
AHMP 16	The findings of any salvage works would be reported on with a copy of the report provided to all RAPs and Heritage NSW.	Heritage reports AHMP COA	Following salvage	Project Archaeologist SEA	COA B24
Construction					
AHMP17	Where any additional, unrecorded Aboriginal objects are encountered during works the Unexpected Finds Procedure will be followed.	Unexpected Finds Procedure Appendix C	Construction Operation Decommissioning	Construction Manager SEA All personal	AH4 COA B24
AHMP18	If human remains are discovered on site, then all work surrounding the area must cease, and the area must be secured. The Unexpected Finds Procedure will be followed to notify police and Heritage NSW as soon as possible. Work must not recommence in the area until this is authorised by Heritage NSW.	Unexpected Finds Procedure Appendix C	Construction Operation Decommissioning	Construction Manager SEA All personal	AH4 COA B24
AHMP19	The location of the approved area for impacts should be clearly shown on all relevant construction mapping and plans to ensure there are no project activities outside the approved development footprint. In the event that	Construction mapping and plans Environment	Pre construction Construction	Construction Manager SEA	COA B24

ID	Measure/requirement	Resources needed	When to implement	Responsibility	Reference
	Aboriginal heritage items outside of the approved Project area are damaged, UGL and Transgrid must advise Heritage NSW immediately. Heritage NSW can be contacted through the Environment Line on 131 555 as soon practicable. An appropriate 'No Go Zone' must be established until the area can be inspected and advice sought from Heritage NSW on how to proceed.	Line on 131 555	Operation Decommissioning	Transgrid	
AHMP20	Monitoring of Aboriginal cultural heritage sites (including reburial locations of salvaged objects) and effectiveness mitigation measures outlined in this plan will be undertaken weekly as per the weekly environmental inspection. Further monitoring would be undertaken during Transgrid inspections and Project audits.	Section 8.1 CEMP	Pre-construction Construction	SEA Transgrid	COA B24

7 COMPLIANCE MANAGEMENT

7.1 STRUCTURE AND RESPONSIBILITIES

UGL's organisational structure and overall roles and responsibilities are outlined in Section 4.11 of the CEMP. Specific responsibilities for the implementation of environmental controls are detailed in Table 6-1 of this Plan and the roles and responsibilities relevant to this plan are outlined in Table 7-1 below. Further details regarding specific responsibilities for the implementation of environmental and heritage controls are detailed in the CEMP.

Table 7-1 Roles & Responsibilities

Roles	Responsibilities
Project Manager (PM)	<ul style="list-style-type: none"> Ensure all non-conformance events are investigated and corrected. Stop work or otherwise mitigate effects of an activity that is causing harm to Aboriginal objects and/or sites. Ensure relevant cultural heritage expectations expressed by the customer or authorities are communicated to the UGL's Project personnel. Ensure resources are made available to enable works to comply with CEMP and other environmental management requirements. Ensure appropriate approvals and licences are held. Ensure all staff and contractors are aware of environmental compliance requirements and environmental controls
Construction Manager (CM)	<ul style="list-style-type: none"> Ensure that any changes to the schedule of works are communicated to the SEA/HSE Manager in a timely manner, if environmental aspects are likely to become affected. Ensure works proceed with all necessary approvals. Ensure that all site personnel and subcontractors are aware of their responsibilities. Stop work or otherwise mitigate the effects of an activity if cultural heritage is an issue.
Senior Environmental Advisor (SEA)/ HSE Advisor	<ul style="list-style-type: none"> Motivate AHMP compliance. Confirm that all necessary cultural heritage controls are implemented and maintained for the duration of the contract. Assist with investigation of all non-conformance events are investigated and corrected.
Employees and Subcontractors	<ul style="list-style-type: none"> Stop work immediately when an unexpected heritage find is encountered. Cordon off area until SEA advises that work can recommence.
Project archaeologist	<ul style="list-style-type: none"> Acting as an environmental subcontractor, specialist work as required. Operate as instructed by the Project Manager/ Project Owner in compliance with all environmental requirements. Undertake salvage works of sites as approved in the COA and complete subsequent reporting, including impact site cards if applicable.

7.2 TRAINING

To ensure that this AHMP is effectively implemented, each level of management is responsible for ensuring that all personnel reporting to them are aware of the requirements of this plan.

All site personnel will undergo the UGL site induction training relating to Aboriginal cultural heritage management issues. The induction training will address elements related to Aboriginal cultural heritage management including:

- Existence and requirements of this management plan.
- Relevant legislation.
- Roles and responsibilities for Aboriginal cultural heritage management.
- Location of identified Aboriginal cultural heritage sites and No-go Zones.
- Proposed Aboriginal cultural heritage management and protection measures.
- Procedure to follow in the event of an unexpected Aboriginal cultural heritage item find or discovery of human remains during construction works.
- Aboriginal culture awareness training for all relevant staff and contractors. This induction will include information about the Aboriginal culture and history of the locality, the location of sites and items that require protection, heritage management measures and protocols, and legal obligations. This training will be developed and presented by a representative of the RAPS and provided to relevant staff before commencing work on-site.

Targeted training in the form of toolbox talks or specific training will also be delivered to personnel with a key role in Aboriginal Heritage management. Examples of training topics include:

- Unexpected finds procedure.
- 'No-go Zones' around heritage items.

All training will be undertaken and records kept in accordance with the COA B24 (vi) which notes the requirement to ensure workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions.

A refresher induction and/or additional training should be implemented following any incident which involves heritage. If future revision of the AHMP occurs it must be considered if a refresher induction and/or additional training should be undertaken.

Where possible any training and/or cultural awareness should include the involvement of the RAPS and/or the local Aboriginal community.

Further details regarding staff induction and training are outlined in Section 6 of the CEMP.

7.3 MONITORING AND INSPECTION

Inspections of sensitive areas and activities with the potential to impact Aboriginal cultural heritage will occur for the duration of the Project. The fencing of the Aboriginal sites which are not approved to be impacted as listed in the COA will be undertaken a minimum of 7 days prior to any construction works occurring. Inspection of these sites will occur fortnightly during construction and every six (6) months thereafter by the SEA. If any substantive changes are identified during the monitoring program of regular inspections, the associated AHIMS site card will be updated to include details of relevant information.

Requirements and responsibilities in relation to monitoring and inspections are documented in Section 9 of the CEMP.

Specifically related to Aboriginal cultural heritage, during construction the effectiveness of the Aboriginal cultural heritage protection measures would be inspected, monitored and reported on weekly as part of the Weekly Environmental Inspection. Further inspection, monitoring and reporting would also be undertaken as part of the regular inspections with Transgrid, as detailed Section 9 of the CEMP.

The Project Owner, Project Manager and their contractor's will respond in a timely manner to any requests relating to monitoring or the effectiveness of heritage/environmental controls and their implementation raised by NSW Government Agencies.

The report provided by the Project Archaeologist following the completion of the salvage program would also provide comment on the effectiveness of heritage controls relevant to the salvage program.

Any stone artefacts collected and/ or recovered during the salvage program may be relocated and buried at a safe location outside the approved development footprint within the Project area. The relocation site/s of the salvaged stone artefacts and subsurface artefacts recovered during the subsurface testing program will also be subject to fencing, monitoring and inspection to ensure there are no inadvertent impacts during the construction works. Inspection of the relocation site/s will occur fortnightly during construction and six (6) months thereafter by the SEA. All inspections of heritage sites will be undertaken following a reporting checklist.

Upon completion of the works, a short report will be prepared, documenting the effectiveness of the AHMP measures.

A copy of the report will be provided by Transgrid to Heritage NSW and the RAPs. It will also be made publicly available.

7.4 CONTINGENCY PLAN, REPORTING AND INCIDENTS

Incidents, non-compliances notification and reporting requirements and responsibilities are documented in Section 8, 9.4 and 9.5 the CEMP and would comply with the COA for this Project.

7.4.1 INCIDENT AND NON- COMPLIANCE NOTIFICATION AND REPORTING

An incident is defined in the COA an occurrence or set of circumstances that causes or threatens to cause material harm and which may not be or cause a non- compliance. Material Harm is harm that:

- Involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial; or
- Results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment)

This definition excludes "harm" that is authorised under either the approval for this Project or any other statutory approval.

Non-compliance is defined in the COA as an occurrence, set of circumstances or development that is a breach of the consent but is not an incident.

Details on incident reporting is included in Section 8 of the CEMP. Any compliance issues will be recorded and raised with the relevant authorities in writing via the Major Projects website. The incident reporting and non-compliance reporting requirements are outlined in C7, C8, C9 and Appendix 5 of the conditions of consent are outlined in Table 7-2 below. The requirements for written notification of an incident which must be followed if Aboriginal cultural heritage items outside the approved disturbance area are damaged and/or in any instance of an incident of non-compliance matter relating to Aboriginal cultural heritage are outlined in Appendix 3 of the conditions of consent and listed below in Table 7-3.

Table 7-2 Reporting COA as per Schedule 5 Conditions 7 to 9.

COA Schedule Condition	Compliance Task	Compliance requirement
C7	Incident Reporting	The Department and NPWS must be notified via the Major Projects website portal immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 5.
C8	Non-Compliance Reporting	The Planning Secretary and the NPWS must be notified in writing via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance
C9		A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.

Table 7-3 Written incident notification requirements

#	WRITTEN INCIDENT NOTIFICATION REQUIREMENTS
1	A written incident notification addressing the requirements set out below must be notified to the Department via the Major Projects website within seven days after the Proponent becomes aware of an incident. Notification is required to be given under this condition even if the Proponent fails to give the notification required under condition C7 or, having given such notification, subsequently forms the view that an incident has not occurred.
2	Written notification of an incident must: <ul style="list-style-type: none"> (a) Identify the development and application number; (b) Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); (c) Identify how the incident was detected; (d) Identify when the applicant became aware of the incident; (e) Identify any actual or potential non-compliance with conditions of consent; (f) Describe what immediate steps were taken in relation to the incident; (g) Identify further action(s) that will be taken in relation to the incident; and (h) Identify a Project contact for further communication regarding the incident.
3	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Proponent must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a

#	WRITTEN INCIDENT NOTIFICATION REQUIREMENTS
	detailed report on the incident addressing all requirements below, and such further reports as may be requested.
4	<p>The Incident Report must include:</p> <ul style="list-style-type: none"> (a) A summary of the incident; (b) Outcomes of an incident investigation, including identification of the cause of the incident; (c) Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and (d) Details of any communication with other stakeholders regarding the incident.

7.4.2 CONTINGENCY PLAN AND REPORTING HUMAN REMAINS

If any human remains or suspected human remains are discovered during any works, all activity in the area must cease immediately and the Unexpected Finds Protocol which is provided in Appendix C of this Plan must be followed to report the find. The NSW Police must be notified immediately. Details of the location and nature of the human remains must be provided to the relevant local police. If there are reasonable grounds to believe that the remains are Aboriginal, Heritage NSW must also be contacted as soon as practicable and you must provide any available details of the remains and their location. Heritage NSW Environment Line can be contacted on 131 555. If the find is determined to be Aboriginal Heritage NSW will provide advice on any additional reporting requirements.

7.4.3 CONTINGENCY PLAN AND REPORTING UNEXPECTED FINDS

If any previously unidentified Aboriginal cultural heritage items are found the Unexpected Finds Protocol which is provided in Appendix C of this Plan must be followed to report the find to the UGL Supervisor, who will notify the UGL Project Manager. If the find it is determined to be covered under approved condition of consent the objects will be salvage in line with the mitigation methods noted in the AHMP. An AHIMS site card will be completed on the discovery of the newly identified Aboriginal objects / Aboriginal cultural heritage items. Should the object(s) / Aboriginal cultural heritage items be salvaged under the condition of consent an Aboriginal Site Impact Recording Form (ASIRF) must be completed and submitted to AHIMS.

7.5 AUDITING

Audits (both internal and external) will be undertaken to assess the effectiveness of environmental controls, compliance with this sub plan, infrastructure approval and other relevant approvals, licenses, and guidelines. Audit requirements are detailed in Section 9.3 of the CEMP.

Aboriginal cultural heritage must be included within any major environmental audit of impacts undertaken during the construction phase of works for the Project.

Audit requirements are detailed in the EMS and must comply with the COA C10:

Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.

The frequency includes within 3 months of commencing construction; and within 3 months of commencement of operations. Each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary. Unless otherwise agreed by the Planning Secretary.

8 REVIEW AND IMPROVEMENT

8.1 CONTINUOUS IMPROVEMENT

Continuous improvement of this Plan will be achieved when opportunities for improvement are identified. Any proposed improvement and/or changes to this Plan are required to be approved by the Planning Secretary prior to implementation except within exception of COA C3 if the Planning Secretary agrees, a plan may be staged or updated without consultation being undertaken with all parties required to otherwise be consulted with. If approved by the Planning Secretary, updated plans supersede the previous versions of them and must be implemented in accordance with the condition that requires the plan. Prior to any actions to this plan occurring in line with COA C3 this must be approved for implementation in writing by the Planning Secretary.

The continuous improvement process will be designed to:

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

8.2 AHMP UPDATE AND AMENDMENT

During the Project, a hard copy of the most recent version of this Plan will be stored at the main site compound. It is the responsibility of the SEA to ensure this hard copy is the most recent version and to remove older versions of the plan once they are superseded at the main site compound.

The processes and plans described in the CEMP may result in the need to update or revise this Plan. Any revision of the AHMP is to ensure it incorporates any recommended measures to improve the environmental performance of the Project. Any proposed changes to this Plan are required to be approved by the Planning Secretary prior to implementation unless approvals in line with COA C3 are approved for implementation in writing by the Planning Secretary for this Plan.

A copy of the updated AHMP with any changes, will be distributed to all relevant stakeholders in accordance with the approved document control procedure (refer to the CEMP) unless this is not required in line with COA C3.

As a minimum the AHMP should be updated within three (3) months following the completion of the long-term management measures and/or the Project of the final design.

In the instance of any modification to the COA, or issue of direction from the Planning Secretary the AHMP would be reviewed, and if revisions of the plan are required the plan would be submitted to the Planning Secretary for approval within 3 months of that change.

In the instance of an incident report or an audit report which notes non-compliance for Aboriginal Heritage the AHMP will be reviewed within 1 month. and if revisions of the plan are required the plan will be submitted to the Planning Secretary for approval and comply with the COA C2 (Revision of Strategies, Plans and Programs) and COA C3 (Updating and Staging of Strategies, Plans and Programs).

9 ACCESS TO INFORMATION

The CEMP details the processes that will be used to keep the local community and relevant agencies informed about the operation and environmental performance of this Project. The main point of contact with DPE for this Project will be via the Major Projects website and all community consultation will be managed by Transgrid throughout the duration of the Project.

While a number of steps will be implemented in order to engage with the community and other stakeholders throughout the various stages of the development as detailed in the CEMP and CCP, one of the main portals for community engagement will be via the Project website (<https://www.transgrid.com.au/projects-innovation/snowy-2-0-connection>):

The website will be used to provide updates as relevant about the progress of the Project and heritage outcomes. The website will be used to provide updates as relevant about the progress of the Project and heritage outcomes. The overarching Heritage Management Plan, including this Aboriginal Heritage Management Plan, will be available on the website in accordance with Condition C11 at all times during the lifetime of the development.

The website will be regularly updated throughout development works and include information such as:

- Layout and general overview of the development.
- How complaints about the development can be made and a complaints handling procedure.
- Contact details of the Proponent or online contact form.

A link to the Major Projects website is also provided, which contains information relating to:

- The EIS.
- Current statutory approvals for the development.
- Modification to this Projects COA.

The procedures for dispute resolution will be undertaken in accordance with the Complaint's Procedure which is detailed in the CEMP. All complaints received via post, phone, email or the project website during construction will be recorded and responded to. It is the intention of the Proponent, Project Manager and their contractors to maintain an open and clear relationship with all stakeholders to prevent complaints from arising. Should the resolution of a complaint not be able to be reached by both parties, following presentation of investigation results to the complainant, either party may refer the dispute to an independent mediator and/or follow the steps outlined in the complaints procedure as detailed in the EMS.

10 REFERENCES

Dibden, J. (2018). *Snowy 2.0 Exploratory Works Aboriginal Cultural Heritage Assessment Report*. Archaeological Report, NSW Archaeology Pty Ltd.

Dibden, J. (2019). *Snowy 2.0 Main Works: Aboriginal Cultural Heritage Assessment Report*, Prepared for Snowy Hydro Limited.

Jacobs. (2020a). *Snowy 2.0 Transmission Connection Project Aboriginal Cultural Heritage Assessment Report*. Prepared for Transgrid.

Jacobs. (2020b). *Snowy 2.0 Transmission Connection Project EIS*. Prepared for Transgrid.

Jacobs. (2021). *Snowy 2.0 Transmission Connection Project Addendum Aboriginal Cultural Heritage Assessment Report*. Prepared for Transgrid.

Transgrid (2021). *Snowy 2.0 Transmission Connection Project Amendment Report*.

APPENDIX A CONSULTATION EVIDENCE

Internal Memo

Snowy 2.0 Transmission Connection project



Aboriginal Management Plan Consultation

Issue

Request sought for assistance from the Yura Ngura Indigenous Advisory Team, engagement for the Snowy 2.0 transmission connection project for further consultation on the draft Aboriginal Management Plan prepared by our contractor UGL.

1. Consultation Log

RAP Group -	Contacted -	Feedback -	Follow up -
Brungle Tumut Aboriginal Lands Council	Spoke with Megan Considine regarding AHMP	Megan had stated that she was waiting on feedback from the family groups involved. She had given feedback directly to Kath Elliot.	
Buru Ngunawal Aboriginal Corporation	Spoke with Wally Bell regarding the AHMP.	Waiting to receive feedback from Wally regarding the AHMP.	
Didge Ngunawal Aboriginal Corporation	There was no contact number, sent through email regarding feedback for AHMP.	Have not received anything at this stage.	
Koomurri Ngunawal Aboriginal Corporation	Attempted contact, no answer via phone call. Email sent.	Have not received any feedback at this stage.	
Merrigarn Indigenous Corporation	Attempted contact, no answer via phone call. Email sent.	Have not received any feedback as yet.	
Muragadi Heritage Indigenous Corporation	No Contact number – Email bounced back		
Murra Bridge Mullangari Aboriginal Corporation	0460839128	Endorsement from Ryan Johnson received via email	
Ngunawal Heritage Aboriginal Corporation	Spoke with Dean Delponte via phone. Sent AHMP through via Email.	I took a call today (11.23am) from Dean Delponte, Director of the Ngambri Local Aboriginal Land Council – previously Ngunnawal? His comments are: Make sure that who ever is responsible for	

RAP Group -	Contacted -	Feedback -	Follow up -
		<p>ensuring the implementation of the management plan has a handover process if they go on leave so that there are no gaps in knowledge.</p> <p>Make sure that any forms for finds etc are noted on site at all times.</p> <p>Feedback via email correspondence – Kath Elliott – Dean Delponte phone conversation.</p>	
Ngarigo Elders -	Spoke with June via phone. Emailed her a copy AHMP for feedback.	AHMP copy sent via email. Have not received any feedback at this stage.	
Yurwang Gundana Consultancy Cultural Heritage Services	Attempted phone contact no answer, AHMP send out via email.	AHMP sent out via email. Have not received any feedback at this stage.	
Ngumbaay Indigenous Corporation	Spoke with Megan via Phone call.	Megan had advised that she had given feedback regarding the AHMP directly to Kath Elliot.	

Source	Comment	Response
<p>From: Megan Considine megan.considine@ngumbaay.com.au Sent: Friday, 3 February 2023 4:06 PM To: Kath Elliott Kath.Elliott@lumea.com.au Subject: Aboriginal management plan</p>	<p>Hi Kath,</p> <p>Community members wanted to add to the response to the management plan:</p> <p>Regarding sacred sites: - From the lookout at Round Top Mountain to the BORA GROUND at Lob's Hole and including EVERY rock shelter and Birth site in between - there are SACRED SITES within the "Study Area." *Lobs Hole, Sheep Station Ridge and Maragle being NO EXCEPTION! All billabongs and significant flat open areas which are likely to be Bora Grounds in the study area should be avoided at all costs .</p> <p>The ancient LANDSCAPE and sacred sites (be they Burial, Ceremonial, Spiritual, National or Familial) are of a worth that is priceless and not being considered in the AHMP. The AHMP talks of "Scatters" of artefacts. "Scatters" of artefacts ARE important but NOT AS IMPORTANT AS SACRED, CEREMONIAL AND LEGENDARY SITES. – THESE ARE NOT OFTEN IDENTIFIABLE BECAUSE OF THEIR HUGE CULTURAL SIGNIFICANCE. Those significant areas are sacred and have been keep secret and will continue to be kept secret because the uninitiated have no right to that knowledge.</p> <p>Best cultural and environmental practices MUST be adhered to in order to avoid the mistakes that have been made in the past with poor land management.</p> <p>Kind regards, Megan</p>	<p>Due to the 'secrecy' of the locations of sacred, ceremonial and legendary sites, Transgrid will secure the services of knowledgeable local indigenous elders to assist the project during the vegetation clearing phase, to ensure any sacred sites not currently identified in the previous studies of the project area, are found and protected.</p> <p>Transgrid will also implement its 'Unexpected Finds' process for any unmentioned physical finds that may have indigenous heritage significance</p> <p>Words to this effect will be inserted in to the Heritage Management Plan.</p> <p>Transgrid have written to Megan Considine to request details of persons that can assist us with this service.</p>

Source	Comment	Response
	<p>31/01/2023</p> <p>Wiradjuri/Wolgalu Community Members C/O: Brungle/Tumut Local Aboriginal Land Council 55 Merivale Street Tumut NSW 2720 (02) 6947 4518</p> <p>To whom it may concern,</p> <p>Re: Snowy Hydro 2.0 Transmission connection project Aboriginal Heritage plan</p> <p>A few points that have been identified are:</p> <ul style="list-style-type: none"> • How are the aboriginal sites that have been identified being protected? • There are concerns surrounding water ways -- Tumut River and Yarangobilly caves are culturally significant. - can we have more information regarding the river/waterways that these lines pass over and/or lead too? • What is the revegetation plan? • Will there be opportunities for indigenous employment? • Could there be a more detailed/updated map of roads -- the current maps do not show endangered species in the area. • There are several RAPS who are not from this country (Wiradjuri/Wolgalu) that should not be included in this management plan. RAPS who are not from this country should not be consulted on these management plans - these RAPS/Corps include: <ul style="list-style-type: none"> • Buru Ngunawal Aboriginal Corporation • Didge Ngunawal Aboriginal Corporation • Ngunawal Consultancy • Koomurri Ngunawal Aboriginal Corporation • Merrigam Indigenous Corporation • Muragadi Heritage Indigenous Corporation • Murra Bidgee Mullangari • Ngarigo Elders • Yurwang Gundana Consultancy Cultural Heritage Services 	<p>Transgrid have written to the CEO of the BTLATC and provided responses to the questions asked.</p> <p>Transgrid now have a line of dialogue with the BTLATC and will use this to maintain an open line of dialogue on project issues throughout the construction phase.</p>

Source	Comment	Response																																																												
	<p>RAPS who should be included are:</p> <ul style="list-style-type: none">• BTLALC community members (first and foremost)• Individual RAPS from Wiradjuri/Wolgalu country <p>We look forward to engaging with you again in the near future.</p> <p><i>Steve Bulger</i> CEO CEO BTLALC Community Members {I</p>																																																													
	<table><tr><th>RAP Name:</th><th>Contact details:</th><th>Signature:</th><th>Date:</th></tr><tr><td>Jarrah Bousfield</td><td>0490937054 jarrah@gmail.com</td><td><i>Jarrah Bousfield</i></td><td>31/1/23.</td></tr><tr><td>Jeffrey Freeman</td><td>0493416231</td><td><i>Jeffrey Freeman</i></td><td>31/1/23</td></tr><tr><td>Paul Freeman</td><td>0424251910</td><td><i>Paul Freeman</i></td><td>31/1/23</td></tr><tr><td>A Freeman</td><td></td><td><i>A Freeman</i></td><td></td></tr><tr><td>Randey Freeman</td><td>0439758209</td><td><i>Randey Freeman</i></td><td>31/1/23</td></tr><tr><td>Janie Williams</td><td>0431050867</td><td><i>Janie Williams</i></td><td>31/1/23</td></tr><tr><td>Jamie Freeman</td><td>0484185827</td><td><i>Jamie Freeman</i></td><td>31.1.23</td></tr><tr><td>Stone Herrington</td><td>0488622866</td><td><i>Stone Herrington</i></td><td>31/1/23</td></tr><tr><td>Steven Connolly</td><td>0477687632</td><td><i>Steven Connolly</i></td><td>31/1/23</td></tr><tr><td>Lorraine Connolly</td><td>0460673322</td><td><i>Lorraine Connolly</i></td><td>31/1/2023</td></tr><tr><td>Imogene Shoemark</td><td>0458886975</td><td><i>Imogene Shoemark</i></td><td>31/1/23</td></tr><tr><td>LINDA Y Connolly</td><td>0478 896 811</td><td><i>Linda Y Connolly</i></td><td>31/1/23</td></tr><tr><td>Paul Freeman</td><td>0438 024 477</td><td><i>Paul Freeman</i></td><td>31/1/23</td></tr><tr><td>Steve Bulger</td><td>0438474</td><td><i>Steve Bulger</i></td><td></td></tr></table>	RAP Name:	Contact details:	Signature:	Date:	Jarrah Bousfield	0490937054 jarrah@gmail.com	<i>Jarrah Bousfield</i>	31/1/23.	Jeffrey Freeman	0493416231	<i>Jeffrey Freeman</i>	31/1/23	Paul Freeman	0424251910	<i>Paul Freeman</i>	31/1/23	A Freeman		<i>A Freeman</i>		Randey Freeman	0439758209	<i>Randey Freeman</i>	31/1/23	Janie Williams	0431050867	<i>Janie Williams</i>	31/1/23	Jamie Freeman	0484185827	<i>Jamie Freeman</i>	31.1.23	Stone Herrington	0488622866	<i>Stone Herrington</i>	31/1/23	Steven Connolly	0477687632	<i>Steven Connolly</i>	31/1/23	Lorraine Connolly	0460673322	<i>Lorraine Connolly</i>	31/1/2023	Imogene Shoemark	0458886975	<i>Imogene Shoemark</i>	31/1/23	LINDA Y Connolly	0478 896 811	<i>Linda Y Connolly</i>	31/1/23	Paul Freeman	0438 024 477	<i>Paul Freeman</i>	31/1/23	Steve Bulger	0438474	<i>Steve Bulger</i>		
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5 | Internal Memo | Snowy 2.0 Transmission Connection project

Source	Comment	Response
<p>From: Megan Considine <megan.considine@ngumbaay.com.au> Sent: Wednesday, 1 March 2023 11:29 AM To: Vince Chaplin <Vince.Chaplin@transgrid.com.au> Cc: btlalc@bigpond.net.au Subject: RE: Aboriginal management plan [Official]</p>	<p>Hi Vince, Thank you for your response; There are many Aboriginal elders who are greatly concerned about the impacts of Snowy 2.0 and Humelink projects on country – knowing that, like Snowy 1, these damages are both massive and irreversible. In response to your question “how should the current document be altered as to best capture what you believe these best practices are?” – it is our belief that the only way to preserve these ancient landscapes would be to walk away now and leave the land (country) untouched. As this is very unlikely to happen, we propose that as these damages are going to be ongoing (erosion, invasive species and visual impacts on spiritual landscapes), the Lobs hole to Marage substation powerlines/humelink should put money in trust, the possibility of a cultural centre to place artefacts and hold stories and culture to address the ongoing damages of this project. In the event of these projects being completed, Snowy Hydro Ltd and Transgrid must pay reparations not just to N.P.W.S (whose present management and oversight of country is poor due to insufficient funding, but in trust to the original and future custodians. By Minimising damage Transgrid etc. will reduce this debt. By treating bora grounds, stone arrangements, lookouts and path ways with the utmost respect and environmental consideration, Lumea and other responsible parties will have shown to have some respect for the study area (country). Local elders are concerned about the spread of invasive species – i.e. Blackberry, Ox eye daisy etc. Transgrid have already shown that they cannot control the weed in steep terrain. Policies and procedures need to be put in place and strictly adhered to in order to minimise the spread of these invasive species and to prevent a future environmental disaster.</p>	<p>Transgrid has taken on board Megan's comments on behalf of Ngumbaay organization.</p> <p>Transgrid has a Soil and Water Management Plan which aims to achieve above-the-standard erosion and sediment control outcomes.</p> <p>Transgrid will be implementing a Weeds and Pathogens Management process throughout both the construction as well as operational phases which will mitigate the potential spread of invasive species and the deleterious visual impact this has on spiritual landscapes.</p> <p>Transgrid intend to work closely with local Tumut Brungle elders during the clearing phase, to ensure bora grounds, stone arrangements, lookouts and pathways are treated with respect and protected from operational maintenance activities into the future asset operation phase.</p> <p>Transgrid's Heritage Management Plan contains an Unexpected Finds procedure which involves ceasing all work in the vicinity of the area until a proper review and assessment can be carried out with subject matter</p>

Source	Comment	Response
	<p>It should go without saying that if ANY SUSPECTED Bora Grounds, lookouts, stone arrangements, pathways or rock shelters are impacted on this project ALL WORK SHOULD BE CEASED IMMEDIATELY until further investigation and satisfactory solutions have been determined and agreed upon by all parties including BTLAC and local Aboriginal Elders.</p> <p>In summary, we the Wiradjuri/Wolgalu people of the Brungle/Tumut Area feel that it is most important to protect our ancient landscapes and would like to avoid all disturbances and disruptions of country in its entirety. As we are aware this is unlikely to happen, we feel that all parties need to be extra diligent and respectful of these sacred places – and that money needs to be put into a cultural centre for preservation, and trust for the rehabilitation and restoration of country for after these projects are complete.</p> <p>Kind regards, Megan Considine Natural Resource Management Officer</p> <p>M 0497 353 116 E megan.considine@ngumbaay.com.au</p>	<p>experts. These experts would involve BTLAC and local aboriginal elders.</p>

APPENDIX B SALVAGE METHODOLOGY

Surface Collection

Each Aboriginal site with surface artefacts that cannot be avoided within the approved Project area as listed Table 5 of Appendix 3 in the COA will need to be salvaged via surface collection prior to construction works commencing for the Project. We would also take the opportunity to examine the immediate surrounds of the recorded sites to identify any other artefacts that may be present within the approved development footprint.

Representatives of RAPs would be invited, as selected by the construction contractor and/or the Developer, to participate in the salvage collection fieldwork. Generally, a minimum of two representatives would be invited to participate. If representatives from the RAPs is not available to participate the salvage program would continue as scheduled with the Project Archaeologist and any RAP representatives who are available to participate, as selected by UGL and/or the Transgrid. If no RAP representatives are available to participate in the salvage program the scheduled salvage works would continue to be undertaken by the Project Archaeologist. A Care and Control Agreement may be established during this salvage period.

The surface collection of the stone assemblage for each Aboriginal site within the approved Project area, as per the COA, would be undertaken through the following process.

- All reasonable attempts would be made to relocate the originally recorded surface stone artefacts however it is acknowledged that changes in the visibility, other approved development activities and other environmental factors may impede the relocation of all of the previously recorded surface stone artefacts. If any additional surface stone artefacts are identified within the approved development footprint these newly identified stone artefacts will be salvaged with the sites that they are associated with or in accordance with the Unexpected Finds Protocol.
- Walk across the site area (within the approved Project area), use 'pin' flags to identify and mark artefacts.
- Photograph site area.
- If considered necessary, construct a collection grid of 2 m x 2 m or 5 m x 5 m or similar as appropriate to the size of the site, only larger sites or sites with higher densities of artefacts will have this strategy.
- As an alternative, GPS plot artefacts if required, this is suitable for smaller sites (~<20).
- Collect artefacts. At each collection site the artefacts will be recorded, bagged and labelled in accordance with their collection position, that is either individual number and/or their collection grid.
- Recording of stone artefacts will be conducted in line with standard archaeological practice to include raw material, type, dimensions and any other characteristics considered relevant and in accordance with the Code of Practice. Photos of particularly interesting items only would be taken.
- The salvaged Aboriginal objects may be temporarily stored until the long-term management and relocation of the salvaged objects can occur.
- The site of the relocated salvaged cultural material would be noted by the submission of site cards to the Aboriginal Heritage Information Management System (AHIMS) as legally required.
- An Aboriginal Site Impact Recording Form must be completed and submitted to AHIMS following harm for each site collected or destroyed from salvage.

Temporary/short term storage of salvaged Artefacts

The objects recovered from the salvage program, which is required to be undertaken prior to any development works, may be temporarily held at a Transgrid-managed secure locked cabinet within the Project area and /or at the office of the Project Archaeologist in a locked cabinet for analysis and recording until an appropriate time as they can be arranged to be relocated within the Project Area, outside the disturbance corridor. Artefact safekeeping during this period will be managed by Transgrid.

As part of the ACHA (Jacobs 2021a) and Addendum ACHAR (Jacobs 2021c), subsurface test excavation was undertaken. All artefacts recovered from the subsurface test excavation program for this Project are currently in temporary care in a locked cabinet by Jacobs. All objects recovered from the previous subsurface test excavation and surface collection salvage program may be temporarily held together in a secure locked cabinet within the Project area and/or at the office of the Project Archaeologist, until an appropriate time that it can be arranged for them to be relocated within the Project area. Any requests by the relevant Registered Aboriginal Parties to look after the artefacts recovered will be considered and advised to the Proponent. A Care and Control Agreement may be established to consolidate this agreement.

The temporary storage of salvaged objects, if required, is not intended to exceed beyond 24 months from the conclusion of the salvage program.

Long term management and the relocation of salvaged artefacts

The relocation/s of the cultural material salvaged and those previously recovered from the subsurface testing program (which are currently in temporary care of Jacobs) would need to be agreed with by the NPWS (Landowner), State Forest (Landowner), Transgrid, UGL, Project Archaeologists and/or RAPs and be outside the proposed disturbance area within the Project area. The site/s for the relocation of salvaged cultural material would be noted by the submission of site cards to the AHIMS as legally required within 1 month from the reburial/relocation of the salvaged Aboriginal objects.

An Aboriginal Site Impact Recording Form (ASIRF) must be completed and submitted to AHIMS following harm for each site collected or destroyed from salvage and/or construction works. Representative from the RAPs would be provided with the opportunity to assist the Project Archaeologist with the salvage program and the relocation of the salvaged objects. Generally, a minimum of two representatives would be invited to participate in the salvage program and the relocation of the salvaged objects. If Aboriginal representatives are available to participate in the relocation of the Aboriginal salvaged objects, they will be asked to conduct a ceremony (i.e. smoking) for the relocation site and artefacts if it is safe to do so. It is noted that a smoking ceremony would only be able to occur if agreed to by the NPWS (Landowner), State Forest (Landowner), Transgrid and UGL and would be subject to any required safety protocols. If representatives from the RAPs are not available to participate, and all reasonable opportunities have been afforded to facilitate this participation, the relocation of the salvaged cultural material which would be returned to Country would continue as scheduled with the Project Archaeologist. The selection of representatives from the RAP to participate in the relocation would be as selected by the construction contractor, Project Owner and/or Transgrid pending contract agreements to facilitate the payment of RAP participation in this work.

Following the relocation of the Aboriginal cultural heritage material the site location/s will also be provided to Transgrid, and UGL to ensure that the site/s within proximity to the disturbance area (within 50 m) are protected during the construction and operation of the Project.

Following the relocation of salvaged Aboriginal cultural heritage material and any previously recovered material from the test excavation program, the mapping within the AHMP would be updated to show and/or include the relocation site/s. It is intended that this would occur within three (3) months of the relocation of sites. A minimum 5 m buffer zone is required to be placed and delineated around the artefact relocation site/s to ensure they won't be impacted into the future.

Salvage Report

At the conclusion of the salvage program a report would be completed detailing the steps taken above. The report would be provided to Transgrid, UGL, Heritage NSW and the RAPs. A copy of the brief

salvage report will be kept on site with a copy of the HMP. The report would document the salvage program and its results. The report may also be used to inform the independent environmental audit which would include heritage.

The salvage report would include as applicable the following:

- Introduction
- Purpose and objective
- Aboriginal involvement and consultation
- Surface collection salvage
 - Surface collection methodology
 - Surface collection results
 - Surface collection Discussion
- Relocation of salvaged objects
- Conclusions.

APPENDIX C UNEXPECTED FINDS PROCEDURE

Introduction

This unexpected find protocol has been developed to provide a method for managing unexpected Aboriginal heritage items identified during the Project works. The unexpected find protocol has been developed to ensure the successful delivery of the Project while adhering to the *NSW National Parks and Wildlife Act 1974* (NPW Act). All Aboriginal heritage objects are protected under the NPW Act Under Part 6 of the Act, though in a State Significant Development (SSD) Development Consent may be issued that allows for conditional harm to Aboriginal objects. However, there are some circumstances where despite undertaking appropriate heritage assessment prior to the commencement of works Aboriginal cultural heritage items or places are encountered that were not anticipated that may be of scientific and/or cultural significance. Therefore, it is possible that unexpected heritage items may be identified during construction, operation and maintenance works. If this happens the following unexpected find protocol will be implemented to avoid breaching obligations under the NPW Act. This unexpected find protocol provides guidance as to the circumstances under which finds may occur and the actions subsequently required.

What is a Heritage Unexpected Find?

An unexpected heritage find is defined as any possible Aboriginal object or place, that was not identified or predicted by the Projects heritage assessment and is not covered by appropriate permits or development consent conditions. Such finds have potential to be culturally significant and may need to be assessed prior to development impact.

Unexpected Aboriginal heritage find may include:

- Aboriginal stone artefacts, shell middens, modified trees, mounds, hearths, stone resources, rock shelters, rock art and stone arrangements.
- Human skeletal remains.

Aboriginal Heritage places or objects

All Aboriginal objects are protected under the *NSW National Parks and Wildlife Act 1974* (NPW Act).

An Aboriginal object is defined as:

Any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with the occupation of that area by persons on non-Aboriginal extraction and includes Aboriginal remains.

All Aboriginal objects are protected, and it is an offence to harm or desecrate an Aboriginal object or place.

Unexpected find management procedure

In the event that any unexpected Aboriginal heritage places or objects are unexpectedly discovered during the Project, the following management protocols will be implemented. This procedure is also outlined in the flow chart provided below. Note: this process does not apply to human or suspected human remains. Follow Section Human Skeletal Remains below if remains or suspected remains are encountered.

1. Works within the immediate identified heritage location will cease. Personnel should notify their supervisor of the find, who will notify the project manager.
2. Establish whether the unexpected find is located within an area covered by approved Development Consent or not.

3. If the unexpected find is determined to be covered under the existing approved development footprint for the Development Consent for the Project undertake the following steps:
 - a. Establish an appropriate buffer to allow for the assessment and management of the find. All site personnel will be informed about the buffer zone with no further works to occur within the buffer zone.
 - b. A heritage specialist or the Project Archaeologist will be engaged to assess the Aboriginal place or object encountered and undertake appropriate salvage of the site, if required, in line with the mitigation methods noted in this HMP. An AHIMS site card will be completed on the discovery of the newly identified Aboriginal objects / Aboriginal heritage items. Should the object(s) / heritage items be salvaged (within the approved development footprint as per the Development Consent for the Project and in line with this AHMP) an Aboriginal Site Impact Recording Form (ASIRF) must be completed and submitted to AHIMS. Salvage of Aboriginal heritage items would not include scarred trees. If previously unidentified scarred trees are identified, further consultation with Heritage NSW and Aboriginal stakeholders would need to be undertaken regarding management as avoidance is the preferred mitigation method for scarred trees.
 - c. Following appropriate salvage of the unexpected find works may continue at this location.
4. If the unexpected find is not covered under the existing approved development footprint for the Development Consent for the Project undertake the following steps.
 - a. All works at this location must cease.
 - b. An appropriate buffer zone of at least 20 metres to allow for the assessment and management of the find must be established. All site personnel will be informed about the buffer zone with no further works to occur. A temporary exclusion area would be established around this buffer zone.
 - c. A heritage specialist or the Project Archaeologist will be engaged to assess the Aboriginal place or object encountered. Registered Aboriginal Party representatives will also be engaged (if available) to assess the cultural significance of the place or object.
 - d. The discovery of an Aboriginal object will be reported to the local office of Heritage NSW and works will not recommence at the heritage place or object until advised to do so by Heritage NSW. A site card will be completed and submitted to AHIMS for registration.
 - e. If the unexpected find can be managed in situ, works at the location will not recommence until appropriate heritage management controls have been implemented, such as protective fencing.
 - f. If the unexpected find cannot be managed in situ, works at the heritage location will not recommence until further assessment is undertaken and appropriate permits and approvals to impact Aboriginal cultural heritage are approved and issued by Heritage NSW.

Unexpected Human Skeletal Remains

If any human remains or suspected human remains are discovered during any works, all activity in the area must cease immediately. The following plan describes the actions that must be taken in instances where human remains, or suspected human remains are discovered. Any such discovery at the activity area must follow these steps.

Discovery:

- If any human remains or suspected human remains are found during any activity, works in the vicinity must cease and the Project Manager must be contacted immediately.

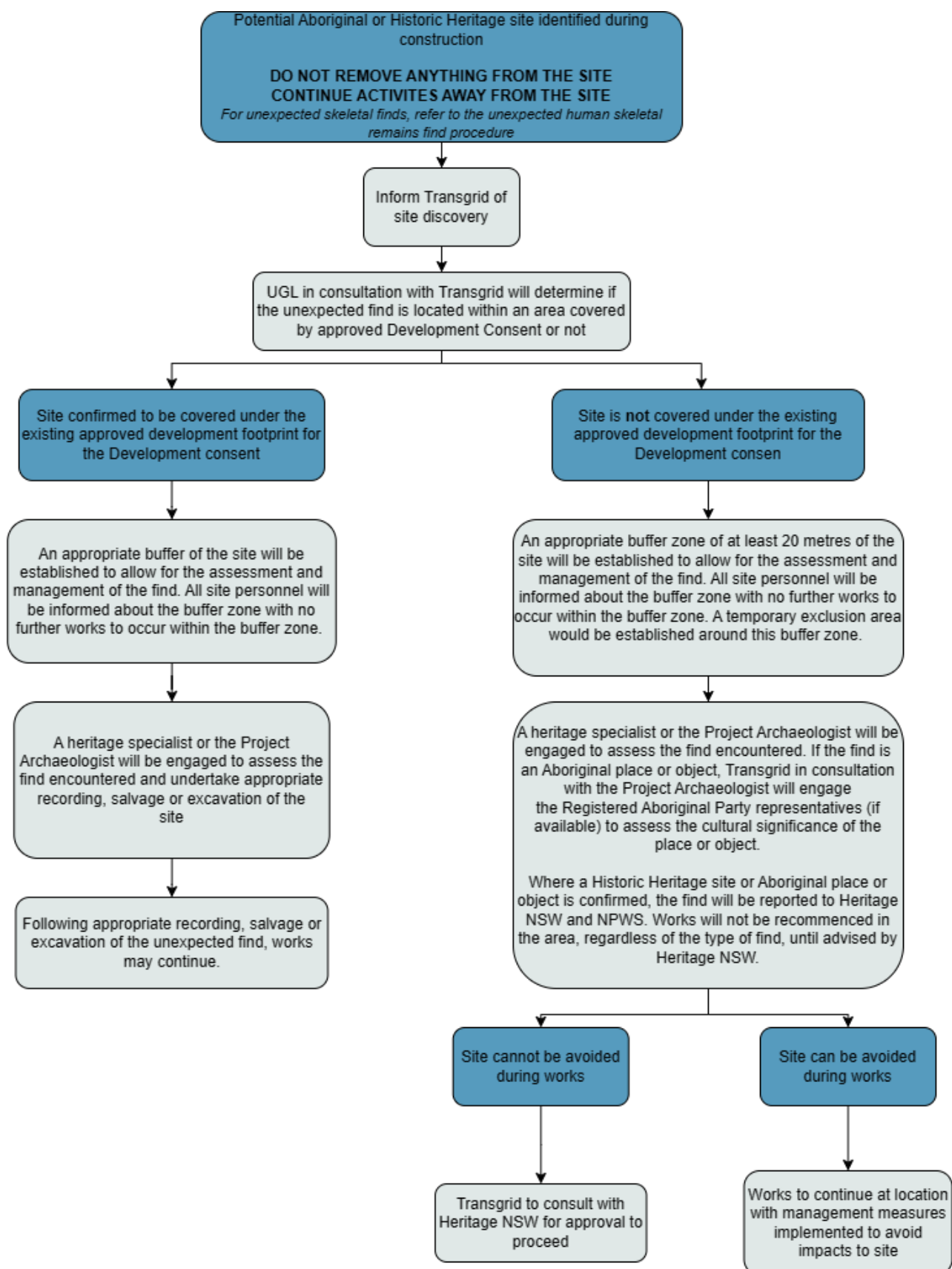
- The remains must be left in place and protected from harm or damage. To protect the remains until their origins can be determined high visibility markers or temporary fencing which will not cause ground disturbance must be immediately placed a minimum of 10 m around the location of the human remains or suspected human remains by site personnel. A minimum no work buffer zone radius of 50 m must be implemented around the remains by taping off the area as an environmental sensitive zone.
- All personnel should then leave the fenced off area immediately.
- The Environmental Officer is responsible to ensure that these temporary measures are implemented onsite within 24 hours of identification.

Notification:

- The NSW Police must be notified immediately. Details of the location and nature of the human remains must be provided to the relevant authorities.
- If there are reasonable grounds to believe that the remains are Aboriginal, the following must also occur:
- Heritage NSW must be contacted as soon as practicable, and you must provide any available details of the remains and their location. Heritage NSW Environment Line can be contacted on 131 555.
- The relevant Aboriginal community groups must be notified immediately when the remains are confirmed to be Aboriginal, as advised by Heritage NSW.
- The relevant Project Archaeologist may be contacted to facilitate communication between the police, Heritage NSW and Aboriginal community groups.

Process:

- If the remains are considered to be Aboriginal by the Police and Heritage NSW no work can recommence at the particular location unless authorised in writing by Heritage NSW
- Recording of Aboriginal ancestral remains must be undertaken by, or be conducted under the direct supervision of, a specialist physical anthropologist or other suitably qualified person.
- Archaeological reporting of Aboriginal ancestral remains must be undertaken by, or reviewed by, a specialist physical anthropologist or other suitably qualified person, with the intent of using respectful and appropriate language and treating the ancestral remains as the remains of Aboriginal people rather than as scientific specimens.
- If the remains are considered to be Aboriginal by the Police and Heritage NSW, an appropriate management and mitigation, or salvage strategy will be implemented following further consultation with the Aboriginal community and Heritage NSW.



Heritage New Find Tool

This form is to be used to record information about Heritage New Finds as required under the Heritage Management Procedure.

Located by:			
Date:		Time:	
Project:		PM:	
General Information			
Location: (GPS coordinates, Tower Location, and other identifiable features)	<< GPS location (E.g. MGA94 Zone 56J 675995mE 7129167mN)>> <<Please attach picture, drawings etc to form>>		
Heritage Areas and Objects			Please Tick
Heritage			
Individual Artefact (<i>stone artefact, stone tool, wooden artefact, glass artefacts</i>)			
Artefact Scatter (<i>two or more artefacts/ tools together</i>)			
Scarred Tree			
Hearths (<i>remains of a fireplace – often indicated by baked clay or grouped hearthstones</i>)			
Shell Scatter/Midden			
Grinding Grooves			
Rock Art			
Engravings			
Story Place (<i>document the reason you've come to this conclusion</i>)			
Landscape features (<i>e.g. resource point</i>)			
Historical Building (<i>including remains</i>)			
Historical (<i>archaeological</i>) object or material			
Burials/ Skeletal Remains or evidence of Human Remains			
Heritage Items			
<<Insert other>>			
Other:			
Submitted to PM:		Date/Time:	

Once complete please upload to Synergy and provide copy to the National Environmental Manager.

APPENDIX D HERITAGE SIGN OFF

Heritage Sign Off Tool

Project:		Division:	
Project No:		Completed By:	
Date of Pegging:			
GPS Points as per UGL Drawing:			
GPS Points as per <<Insert Group>> Monitor Advice:			
Heritage Area located between project Pole Numbers:			

No.	Activity Description	UGL Signature	Rep	<Insert Group>> Monitor Signature
1	Star Dropper Location			
1.1	Location of Heritage Exclusion zone pegged as per UGL Drawing exclusion zone			
1.2	Dropper located as per <<Insert Group>> Monitor Advice			
2	Star Dropper Driven Depth			
2.1	Mark star droppers at 300mm for depth and drive down to mark			
3	Blue Flagging			
3.1	Blue Flagging erected around the entire exclusion zone			
3.2	Blue Flagging partially erected on the alignment to identify the exclusion zone			
4	Exclusion Zone Signage			
4.1	Signage erected on all flagged approach faces of the exclusion zone			
5	Exclusion Zone Inspection			
5.1	Exclusion zone inspected for any ground disturbance (any ground disturbance must be recorded in the comments section and detailed photos attached)			
6	Completion			
6.1	All materials and area cleaned up prior to demobilising			

6.2	Photos taken of zone completed		

Comments:

REVIEW & ACCEPTANCE			
UGL Representative		<<Insert Group>> Heritage Monitor	
Name		Name	
Position		Position	
Date		Date	
Signature		Signature	

Description:

Picket No.	GPS Co-ordinates (At points where direction changes)	
1		
2		
3		
4		

APPENDIX B HISTORIC HERITAGE MANAGEMENT PLAN

HISTORIC HERITAGE MANAGEMENT PLAN

Maragle 330kV Switching Station and 330kV Transmission Line Connections

Document number: 3200-0645-PLN-019-CEMP-HHMP

Revision date: 10/08/2023

Revision: 0.08

Plan Approval

Rev.	Approval	Name	Position	Organisation	Signature	Date
0.08	Approved By	Tim McCarthy	Project Manager	UGL	<i>Tim McCarthy</i>	15/08/2023
0.08	Endorsed By	Andrew Buttigieg	Senior PM (Delivery)	Transgrid	<i>A. Buttigieg</i>	15/08/2023

Document Revision History

Rev.	Date	Prepared by	Reviewed by	Approved by	Remarks
0.01	06/10/2022	Jane Love	Jakob Ruhl	Trevor Noble	Initial issue for review
0.02	08/11/2022	Jane Love	Jakob Ruhl	Trevor Noble	Required plan review
0.03	28/11/2022	Whitney Heiniger	Kim Lembke	Trevor Noble	Addition of Appendix E
0.04	12/12/2022	Jane Love	Kim Lembke	Trevor Noble	Addressing Heritage NSW and NPWS comments
0.05	04/04/2023	Jane Love	Kim Lembke	Trevor Noble	Addressing Transgrid comments
0.06	14/04/2023	Jane Love	Kim Lembke	Trevor Noble	Addressing Transgrid comments
0.07	2/08/2023	Whitney Heiniger	Kim Lembke	Trevor Noble	Addressing DPE comments
0.08	10/08/2023	Whitney Heiniger	Kim Lembke	Tim McCarthy	Addressing DPE comments

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ACRONYMS AND ABBREVIATIONS

Abbreviation	Explanation
AHMP	Aboriginal Heritage Management Plan
CEMP	Construction Environmental Management Plan
CM	Construction Manager
COA	Condition of Approval
DPE	Department of Planning and Environment
EIS	Environmental Impact Statement
EMS	Environmental Management System
EP&A	<i>Environmental Planning and Assessment Act 1979</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
HHIMS	Historic Heritage Information Management System
HHMP	Historic Heritage Management Plan
HSE	Health Safety and Environment
km	kilometres
KNP	Kosciuszko National Park
kV	Kilovolts
LEP	Local Environmental Plan
m	Metres
MNES	matter of national environmental significance
NHL	National Heritage listing
NPWS	National Park and Wildlife Services
NSW OEH	NSW Office of Environment and Heritage
POM	Plan of Management
Proponent, the	NSW Electricity Networks Operations Pty Ltd as a trustee for NSW Electricity Operations Trust (Transgrid)
RNE	Register of the National Estate
SEA	Senior Environmental Advisor
SEP	Site Environmental Plan
SHR	State Heritage Register
UGL	UGL Engineering Pty Ltd
UGLMS	UGL Management System

1 INTRODUCTION

Refer to Section 1 of the HMP for the Project context, description and Environmental Management System (EMS).

1.1 PURPOSE AND OBJECTIVES

The purpose of this Plan is to address the construction environmental management requirements detailed within the following documents:

- Snowy 2.0 Transmission Connection Project – Environmental Impact Assessment (Jacobs, Feb 2021).
- Snowy 2.0 Transmission Connection Project – Non-Aboriginal Heritage Assessment (Jacobs 2021a).
- Snowy 2.0 Transmission Connection Project – Amendment Report (Transgrid, Dec 2021).
- Department of Planning and Environment (DPE) Infrastructure Approval 2 September 2022.
- Project EPBC Approval 2018/8363 (21 October 2022).

Additionally, the purpose of this HHMP is to provide a consistent and transparent process for the management of historic heritage and natural heritage sites to enable the Project team to design and undertake construction activities to avoid disturbance of heritage items. This HHMP applies specifically to proposed activities carried out within the land subject to the Project.

This HHMP seeks to mitigate possible potential impacts on historic and natural heritage by:

- Ensuring direct management of all actions considered necessary to protect historic values in the area of the Project and all areas where ancillary works are planned.
- No ground disturbing activities without a signed Site Environmental Plan (SEP) specific to the work area. Historic heritage surveys and the identification of avoidance sites within or adjacent to the proposed work area shall be included in the CEMP.
- Ensuring the development does not cause any direct or indirect impacts on any historic heritage items located outside the approved construction envelope.
- All reasonable precautions will be taken to protect historic and natural heritage sites from damage caused by construction and associated activities including barricading / bunting.
- Undertake archival recording, test excavation and/or salvage of the historic items listed in Table 5 and Table 7 of Appendix 3 (of infrastructure approval) if these items are to be affected by the development.
- Providing a mechanism that ensure the Project avoids impacts to such areas.
- Providing protection for any historic or natural heritage material that is found during the construction phase of this Project.

The key objective of this HHMP is to reduce the impact of the Project activities on historic and natural heritage at and surrounding the Project through specific objectives and targets. Objectives for the management of historic and natural heritage are:

- To safeguard and protect of all historic and natural heritage in the area.
- To recognise that all forms of historic and natural heritage in the Project area is valued as equal importance.

- Any impact to a historic and natural heritage site shall be recorded as an Incident. An “incident” is defined as anyone or a combination of the following:
 - Non-compliance with the HHMP that causes, or threatens to cause material harm
 - Unintentional or unauthorised damage or loss to any historic or natural heritage site in the form of the impacts noted above
 - Any trespass outside of the approved works areas into a historic or natural heritage site
- Historic and natural heritage management measures fully implemented and no historic and natural heritage incidents to occur.
- Consultation with all relevant stakeholders if any historic or natural heritage items are located.

This plan should be considered to be a live document that is amended in light of the learning experienced during its implementation. However, any proposed improvement and/or changes to this plan are required to be approved by the Planning Secretary prior to implementation. Further information about the nature of works to be completed and details on the Project can be found in the overarching CEMP.

2 ENVIRONMENTAL ASSURANCE

2.1 RELEVANT LEGISLATION AND GUIDELINES

2.1.1 LEGISLATION

Legislation relevant to this HHMP includes:

- *Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth) (EPBC Act)
- *Environmental Planning and Assessment Act 1979* (EP&A Act)
- *Heritage Act 1977* (Heritage Act)
- Heritage Regulation 2012
- *National Parks and Wildlife Act 1974*

Relevant provisions of the above legislation are explained in the register of legal and other requirements included in Appendix C of the CEMP.

2.1.2 GUIDELINES AND POLICIES

Guidelines and policies relevant to this HHMP includes:

- Kosciuszko National Park Plan of Management 2006 (KNP PoM) (NSW National Parks and Wildlife Service 2006).
- Kosciuszko National Park Geodiversity Action Plan 2012-2017.
- The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance (2013).
- Assessing Heritage Significance (NSW Heritage Office 2001).
- Archaeological Assessment Guidelines (NSW Heritage Office and NSW Department of Urban Affairs and Planning 1996).
- Assessing significance for historical archaeological sites and relics 2009, (NSW Heritage Council).
- Stabilising stuff: A guide for conserving archaeological finds in the field, (NSW Heritage Council, OEH, ICS 2012).
- How to Prepare Archival Recording of Heritage Items (Heritage Branch 1998).
- Photographic Recording of Heritage Items Using Film or Digital Capture (Heritage Branch 2006).
- Exhumation of Human Remains (NSW Department of Health 2008).
- Skeletal Remains – Guidelines for the Management of Human Skeletal Remains under the Heritage

2.2 PERMITS AND LICENCES

There are no licences or permits relevant to the management of historic heritage. Further details regarding permits and licences are provided in Appendix C of the CEMP.

2.3 PROJECT CONDITIONS OF APPROVAL

The Conditions of Approval (COA) and mitigation measures relevant to this Plan are listed in Table 2-1 below. A cross reference is also included to indicate where the requirement is addressed in this Plan or other Project management documents.

The table below does not include Aboriginal heritage as this is addressed within the Aboriginal Heritage Management Plan (AHMP)).

Table 2-1 Project conditions of consent relevant to the HHMP

Reference number	Requirement	Document Reference
Conditions of Approval		
COA B22	The Proponent must ensure the development does not cause any direct or indirect impacts on: <ul style="list-style-type: none"> (a) Any Aboriginal heritage items located outside the approved construction envelope (refer to Appendix 3 of infrastructure approval) (b) Any of the historic heritage items out the construction envelope (refer to Appendix 3 of infrastructure approval) 	Aboriginal Heritage is addressed in the Aboriginal Heritage Management Plan (AHMP) Section 6.2 and Table 6-2
COA B23	Prior to carrying out any activity that could harm heritage items, the Proponent must: <ul style="list-style-type: none"> (a) Salvage and relocate all heritage items identified for salvage and relocation to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010); (b) Undertake archival recording, test excavation and/or salvage of the historic items listed in Table 5 and Table 7 of Appendix 3 (of infrastructure approval) if these items are to be affected by the development. 	Aboriginal Heritage is addressed in the AHMP Archaeological excavation and recording is addressed in Section 6.1
COA B24	Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Appendix 3, the Proponent must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: <ul style="list-style-type: none"> (a) Be prepared in consultation with Heritage Council, Heritage NSW, NPWS and Aboriginal Stakeholders; (b) Include a description of the measures that would be implemented for: <ul style="list-style-type: none"> i. Protecting the heritage items identified in Table 1 of Appendix 3, including fencing off the heritage items (where required) prior to carrying out any development that could harm the heritage items, and protecting any items located outside the approved construction envelope; 	This plan Consultation is summarised in Section 3 and Appendix A Mitigation measures are addressed in Section 6.

Reference number	Requirement	Document Reference
	<ul style="list-style-type: none"> ii. Salvaging and relocating the heritage items identified in condition B23; iii. Where impacts cannot be avoided to R56 and R120, details of the proposed archaeological research design and excavation methodology, and findings of the Final Archaeological Excavation Report, in accordance with the relevant Heritage Council guidelines; iv. Minimising and managing the impacts of the development on heritage items within the construction envelope, including a strategy for the long-term management of any heritage items or material collected during the test excavation or salvage works; v. A contingency plan and reporting procedure if: <ul style="list-style-type: none"> • Heritage items outside the approved construction envelope are damaged; • Previously unidentified heritage items are found; or • Aboriginal skeletal material is discovered; vi. Ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and vii. Ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and <p>(c) Include a program to monitor and publicly report on the effectiveness of these measures and any heritage impacts of the development; and</p> <p>(d) Include a program to publish;</p> <ul style="list-style-type: none"> i. Any detailed archival records required under the conditions of this approval; and ii. The findings of any excavations and salvage works. <p>Following the Planning Secretary's approval, the Proponent must implement the Heritage Management Plan.</p>	<p>Appendix E</p> <p>Unexpected finds plan is provided in Appendix B.</p> <p>Training is addressed in Section 7.2</p> <p>Aboriginal Heritage is addressed in the AHMP</p> <p>A program to monitor and publicly report on the effectiveness of these measures and any heritage impacts of the development is outlined in Table 6-2, Section 7.3, 7.4 and 7.5 of this plan.</p> <p>Archival records and findings of excavations are addressed in Section 6.1 and Appendix E of this plan.</p> <p>The findings of salvage works are addressed in the AHMP.</p>
Mitigation measures		

Reference number	Requirement	Document Reference
NH1	During detailed design, if the disturbance area changes but is still within the Project area, a consistency assessment will be prepared to confirm if impacts are consistent with the EIS.	Table 6-2
NH2	A historic and natural heritage management plan will be prepared for the Project, which clearly outlines the extent of impact to each recorded historic heritage item within the disturbance area and potential impacts to those sites located within the broader Project area. The plan should clearly outline measures for their protection (where applicable) and details of further investigation and archaeological archival recording where appropriate.	This plan
NH3	<p>If archaeological excavations are required:</p> <ul style="list-style-type: none"> Transgrid will nominate a suitably qualified and experienced historical archaeologist to manage the historical archaeological program. This person must fulfil the Heritage Council's Excavation Director Criteria 2019 for the excavation of locally significant archaeological sites. Archaeological Research Design and Excavation Methodology will be prepared to guide the archaeological program. It will be prepared according to Heritage Council of NSW guidelines. The methodology will be submitted for comments to the Heritage Council of NSW (or its delegate) and approval by DPE prior to the commencement of archaeological excavation. A final archaeological excavation report will be prepared within 12 months of the completion of archaeological excavation. It will include details of any significant artefacts recovered, where they are located and details of their ongoing conservation and protection in perpetuity by the landowner. Copies of the final excavation report will be provided to DPE, the Heritage Council of NSW and to the local Council's local studies unit. 	<p>Section 6.1</p> <p>Appendix E</p>
NH4	<p>All heritage items within the disturbance area that are to be impacted by the Project will be subject to archival recording and archaeological excavations prior to the commencement of works.</p> <p>If these sites have been entirely destroyed by the Snowy 2.0, then the mitigation measures relating to archival recording and archaeological excavations will not apply.</p>	Section 6.1

Reference number	Requirement	Document Reference
NH5	If the construction of the Project will destroy or directly impact the R45 (Lobs Hole Copper Mine Water Race), archival recording and archaeological excavation must occur prior to the commencement of construction.	Section 6.1
NH6	<p>In the event that a site or artefact (as defined by the NPW Act or Heritage Act) is identified during construction works, works will cease at the location and no further harm to the object will occur. The find will be immediately reported to Transgrid, and the regulator in accordance with legislation. No work will commence in the vicinity of the find until any required approvals have been given by the regulator.</p> <p>In the event that skeletal remains are encountered during the activity, works must stop immediately, the area secured to prevent unauthorised access and Transgrid, NSW Police and DPE contacted.</p>	Section 6.4 Appendix B
L8	The CEMP will include measures to identify and report any newly identified geodiversity sites. It will also include measures to minimise impacts to known geodiversity sites.	Table 6-2

The historic heritage items referred to in Table 6 of Appendix 3 of the COA, which are referred to in B22, that are to be avoided by the development are listed below in Table 2-2 for easy reference. No harm must occur to these heritage sites.

Table 2-2 Historic heritage items listed in Appendix 3 to be avoided.

Item	COA Requirements
R48	Avoid Impacts
R49	Avoid Impacts
R50	Avoid Impacts
R65	Avoid Impacts
R75	Avoid Impacts
R76	Avoid Impacts
R110	Avoid Impacts
R111	Avoid Impacts
R115	Avoid Impacts
R132	Avoid Impacts

The historic heritage item referred to in Table 7 of Appendix 3 of the COA, which are referred to in B23, that are to be subject to archival recording, testing exaction, salvage if warranted prior to activity occurring by the development are listed below in Table 2-3 for easy reference.

Table 2-3 Historic heritage items listed in Appendix 3 to be salvaged

Item	Contributory significance	Mitigation, if disturbed	COA Requirements
R45	Moderate	Yes, identified in Main Works	Archival recording, testing exaction, salvage if warranted
R46	Negligible	Yes, identified in Main Works	Archival recording, testing exaction, salvage if warranted
R54	Little to moderate	Yes, identified in Main Works	Archival recording, testing exaction, salvage if warranted
R55	Negligible	Yes, identified in Main Works	Archival recording, testing exaction, salvage if warranted
R56	Low	Yes	Archival recording, testing exaction, salvage if warranted

Item	Contributory significance	Mitigation, if disturbed	COA Requirements
R57	Moderate to high	Yes, identified in Main Works	Archival research, archival recording, Interpretation Plan
R106	Moderate	Yes, identified in Main Works	Archival research, archival recording, Interpretation Plan
R107	High	Yes, identified in Main Works	Archival research, archival recording, salvage moveable heritage, if warranted and impacts are expected, test/salvage excavation and interpretation plan
R120	Moderate	Yes	Archival recording, testing exaction, salvage if warranted
R128	Moderate	No	Archival recording, testing exaction, salvage if warranted

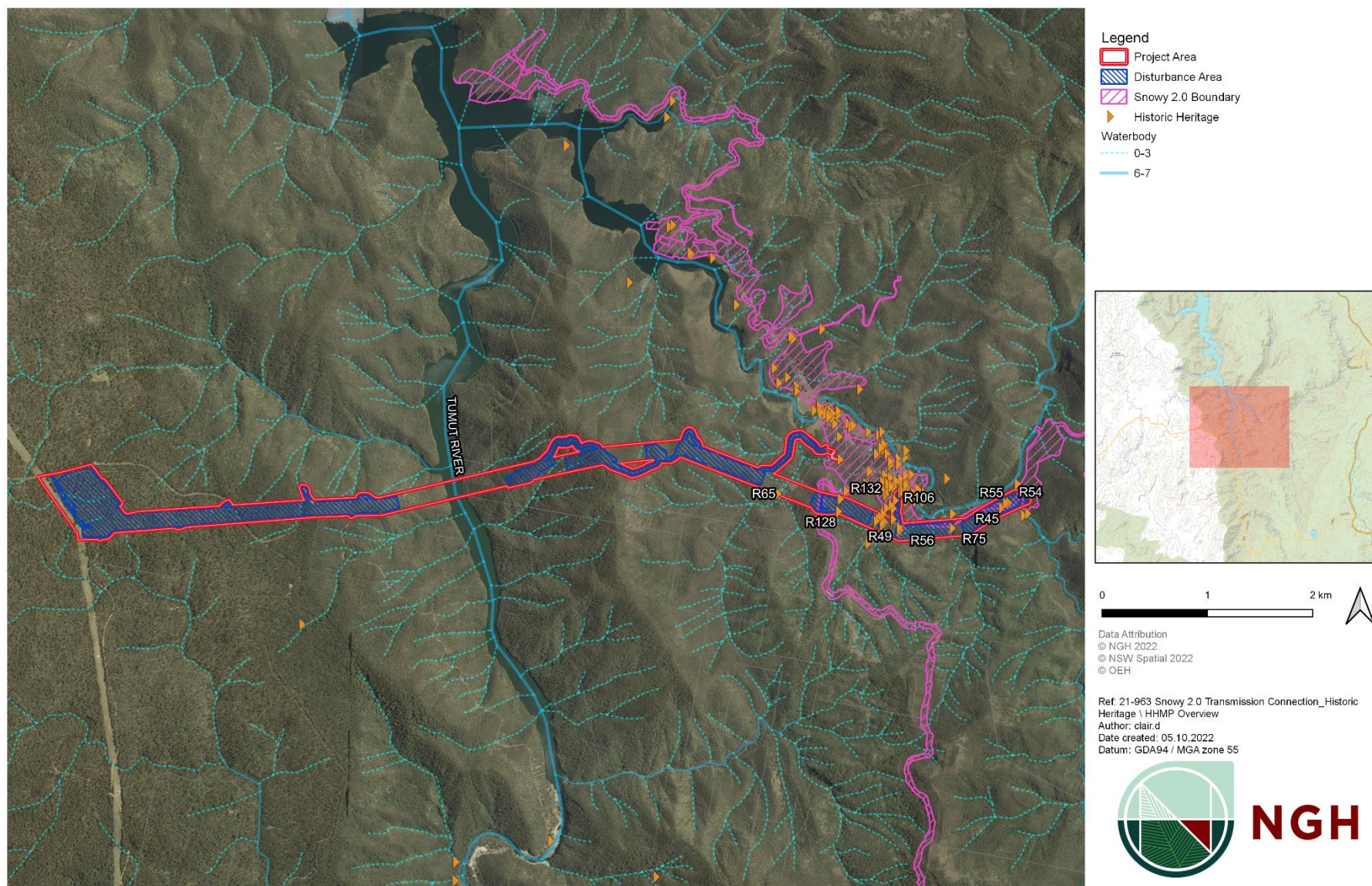


Figure 2-1 Historic heritage items within the Project area

3 CONSULTATION

3.1 CONSULTATION UNDERTAKEN TO DATE

In accordance with Condition B24 of the Approval, the HHMP has been prepared in consultation with the Heritage NSW, Heritage Council and National Park and Wildlife Services (NPWS).

3.1.1 HERITAGE NSW AND HERITAGE COUNCIL NSW

This HHMP was provided to Heritage NSW on 17 October 2022 for comment. Heritage NSW submitted a query to Transgrid for an Archaeological Research Design and Excavation Methodology required under the SSI-9717 CoA. An ARD&EM has since been added to the plan (Appendix E).

Heritage NSW and Heritage Council of NSW reviewed the HHMP including the Archaeological Research Design and Excavation Methodology and provided a letter on 7 February 2023 outlining the document sufficiently addresses the conditions of consent and that no further comment is required under the *Heritage Act 1977*. This sign off letter is provided in Appendix A.

3.1.2 NPWS

This HHMP was provided to NPWS on 17 October 2022 for comment. NPWS responded on 14 November 2022 with comments, which have been addressed in this plan.

3.2 ONGOING CONSULTATION

In accordance with mitigation measure NH3, consultation will be required with DPE and Heritage NSW if archaeological excavations are required.

Appendix B of this HHMP includes procedures for dealing with unidentified heritage objects and for identifying when works can re-commence in consultation with Heritage NSW.

In the event of an unexpected historic or natural heritage find during works, all works shall cease immediately and procedures within Appendix B are followed.

4 EXISTING ENVIRONMENT

The existing landscape character of much of the Project area consists of undisturbed and mountainous terrain, forested valleys, and alpine environment in NSW. This landscape contains limited human disturbance, however existing transmission line easements, minor access tracks, and infrastructure associated with the Talbingo Reservoir are located within and surrounding the Project area.

4.1 HISTORICAL CONTEXT

Much of the landscape contains limited human disturbance, however some development within and in proximity to the Project includes an existing transmission line, minor access tracks, and infrastructure associated with the Talbingo Reservoir. European settlers have been living and working within the Project area since the early 19th century. The historical record shows that there have been phases of land use, commencing with pastoralism and subsumed by mining, of both copper and gold.

Mining in the Australian Alps was primarily for alluvial gold mining, which brought large numbers of people to settle in the Australian Alps in towns like Kiandra, approximately 13 kilometres from the Project. With the commencement of mining for copper in 1874 at Lobs Hole (also known as Ravine), a settlement began to support both the miners and the facilities required by them. By 1908, the village of Ravine contained a number of temporary buildings, a school, butcher's shop, blacksmiths' shop and a boarding house. At its height, 500 people lived at Lobs Hole.

From 1915, the village of Ravine began its decline due to falling copper prices and World War One leading to the abandonment of the Lobs Hole Central Mine.

Mining also occurred at the New Maragle goldfields which opened in 1874, however unlike Lobs Hole, no town was established.

The construction of the Snowy Scheme brought another wave of habitation into the area, although it is likely that it also destroyed much of the earlier heritage. The Snowy Scheme was completed in 1974, with a total of seven power stations, 16 dams and 225km of tunnels, pipelines and aqueducts.

4.2 HERITAGE LISTINGS

As part of the EIS, a non-Aboriginal cultural heritage assessment was undertaken by Jacobs (2021). The assessment included a search of the following databases to establish known heritage items within the locality:

- State Heritage Register.
- State agencies section 170 register.
- Australian Heritage database (including Commonwealth and National Heritage Lists).

Eight items were identified within the Project area as outlined in Table 4-1 below. The Project is located within the curtilage of two heritage places on the National Heritage List (NHL), being the Australian Alps National Parks and Reserves, and the Snowy Scheme. These heritage places are a matter of national environmental significance (MNES) under the EPBC Act. The Project would not physically impact any of the physical components of the Snowy Scheme, but the Project area includes about 195ha or 0.028% of Kosciuszko National Park (KNP), which is one of 11 parks and reserves that comprise the larger Australian Alps National Parks and Reserves heritage place and which also contains components of the Snowy Scheme. Due to the Projects relatively small footprint within the curtilage of these two items the Project would not impact the existing historic or natural heritage values of either item.

Table 4-1 Summary of heritage items identified on heritage registers in the locality

Item name	Listing	Significance	Within Project area
Australian Alps National Parks and Reserves	NHL - listed place	National	Partially
Snowy Mountains Scheme	NHL - listed place / Register of the National Estate (RNE)	National	Partially
Four Mile Hut	RNE	National	No, over 10km south
KNP (1981 boundary)	RNE	National	Partially
Matthews Cottage	State Heritage Register (SHR) / Locale Environmental Plan (LEP)	State/Local	No, over 10km east
Kiandra Courthouse/ Chalet	SHR/LEP	State/Local	No, over 10km east
Sue City	Historic Heritage Information Management System (HHIMS)	Local	No, over 2.5km south
Items relating to New Maragle goldfield	HHMS	Local	No, over 1km south

4.3 PREVIOUS HERITAGE ASSESSMENTS

As part of the *Snowy 2.0 Main Works EIS* (EMM, 2019), 20 items of non-Aboriginal heritage were identified within the Project area of this Project. Ten of these items are located within the disturbance area (Table 4-2), within the remaining 10 outside the disturbance area (Table 4-3). All items can be seen in Figure 4-1. Two of these items (R45: Lobs Hole Copper Mine Water Race and R49: Circular stone wall) are assessed as having heritage significance under the *Assessing Heritage Significance - A NSW Manual Update* (NSW Heritage Office, 2001).

4.4 SITE SURVEYS AND SIGNIFICANCE ASSESSMENT

The site inspection as part of the non-Aboriginal cultural heritage assessment noted that the only area within the Project area with a high potential for non-Aboriginal heritage items was in the Lobs Hole Ravine (Project area east). Although 10 of the historic heritage items previously identified by Snowy 2.0 are located in the disturbance area of Project area east, only five were able to be ground-truthed.

No historic heritage items were identified in the Project area in addition to those already recorded and assessed as part of Snowy 2.0.

In accordance with *Assessing Significance for Historical Archaeological Sites and 'Relics'* (OEH, 2009):

'A relic is now an archaeological deposit, resource or a feature that has heritage significance at a local or State level.'

An archaeological site is an area which contains one or more archaeological 'relics'. The significance of these items is assessed by using a system of assessment centred on the Burra Charter. In NSW, heritage is assessed against seven criteria. If an item meets one or more of the seven heritage criteria, and retains the integrity of its key attributes, it can be considered to have significance. The significance of the ten items identified within the Project disturbance area is outlined in Table 4-2.

The Lobs Hole Copper Mine water race (R45) is an important component of the mining history at Lobs Hole. It has a strong association with Reeckmann and Forsstrom, who were important in developing mining at Lobs Hole and as central figures in the Lobs Hole Copper Mining Company. The Lobs Hole Copper Mine Water Race is assessed to be of local significance against criteria a (Historical significance) and b (Associative significance).

Table 4-2 Summary of heritage items within disturbance area

ID	Site name	Details	Archaeological potential	Archaeological Significance
R45	Lobs Hole Copper Mine Water Race	This water race is cut into the base of the hill slope on the southern side of the Yarrangobilly River. Extends from an unspecified source on Wallaces Creek (believed to be near junction with Stable Creek) to Lobs Hole Copper Mine. It is on south side of Mine Trail Road and mostly intact until it becomes truncated by the existing road at grid ref: 627406.6038061. It appears that Mine Trail Road has been built on the race from that point, and west to where the race would have joined the steel pipe (R74) to take the water down eastwards to the mine.	No Archaeological potential	Local (moderate) heritage significance
R46	Large excavation	This large excavation (20m across, 40m long and 4m deep) is located on the western side of Lobs Hole Ravine Road. It is heavily overgrown, and its purpose is unknown.	Limited – The purpose of the item is not known and appears to be heavily disturbed. Without understanding its former purpose, assigning significance is difficult. However, test excavations may provide evidence of the purpose of the item and clarify the item's significance and archaeological potential	Low
R54	Site of bridge	This was once the site of a bridge crossing of the Yarrangobilly River at the end of the mine trail.	No Archaeological potential	No Archaeological significance
R55	Brick hearth	This hearth is interpreted as belonging to a former picnic	No Archaeological potential	No Archaeological significance

ID	Site name	Details	Archaeological potential	Archaeological Significance
		site. Machine pressed bricks: early 20 th century and other.		
R56	Excavated ditch	This feature (7m long, 1.5m wide and 1.4m deep) appears as an old cut and benched road alignment in the Struggle Street area. Earth and rock mounded on downhill side.	Limited – The purpose of this item is unknown, overgrown and disturbed. There is mound of earth and rock on its downhill side.	Low
R57	Old road alignment	This feature appears as an old cut and benched road alignment in the Struggle Street area. It measures approximately two metres wide, but is overgrown with regenerating bushland	No Archaeological potential	No Archaeological significance
R106	Old road	This road is fragmentary and appears as an extension of a road in the Struggle Street area	No Archaeological potential	No Archaeological significance
R107	Building platform	This level platform (10m long and 4m wide) and tin scatter in the Struggle Street area. The platform is overgrown with regenerating bush and the ground's surface is obscured by leaf litter, providing low visibility.	Limited – This item was marked on a 1911 map as being "old mine buildings". All that remains is a building platform, although a scatter of tin was noted on the surface by NSW Archaeology in 2018. Excavations may indicate whether the old mine buildings did once occupy the site, however given the small area (10m x 4m) it is uncertain whether the research potential would be of sufficient significance to meet NSW heritage significance criteria.	Archaeological potential (test excavations are to be undertaken prior to construction to determine significance)
R120	Building platform	This platform on a prominent knoll at the top of Struggle Street. An alignment of stone two metres in length is noted along the northern edge.	Although features on this platform were described as 'vestigial' in the inventory sheets for the Exploratory Report (NSW Archaeology, 2018), the main works report lists the item as being of moderate heritage significance and of high archaeological significance (NSW Archaeology, 2019:368). This later assessment was based on the presence of building material on the site,	High (test excavations are to be undertaken prior to construction to determine significance)

ID	Site name	Details	Archaeological potential	Archaeological Significance
			relatively intact soils and its apparent association with other buildings on "Struggle Street".	
R128	First school at Lobs Hole	The first school was described as being a single structure on the top of a steep hill. The school building was of wooden construction with a stone-lined wooden chimney and two windows. The first teacher was appointed in 1892. In 1908 the district inspector recommended that the school be decommissioned owing to its poor condition. A new school site was procured in the proposed village site and the new school opened in 1909.	Moderate - Being of wooden construction, the wooden school is unlikely to have left much in the archaeological record, however as it was operational for a period of approximately 16 years, there may be potential for remains of the stone-lined chimney and perhaps items belonging to the teachers and/or children. These have the potential to answer questions regarding the location of the school and life in the early years of the Lobs Hole settlement. However, without excavation to examine the subsurface deposit, this cannot be confirmed.	Moderate to High

One of the items, Circular stone wall (R49) within the Project area was also identified as having local heritage significance (Table 4-3). The other nine items within the Project area but outside the disturbance area had no archaeological significance.

Table 4-3 Summary of heritage items within Project area but outside disturbance area

ID	Site name	Archaeological Significance
R48	Excavation (possible shed)	No
R49	Circular stone wall	Yes – local significance
R50	Shed with bullock wagon frame	No
R65	Thomas house	No
R75	Mine shaft on ML 31	No

ID	Site name	Archaeological Significance
R76	Scatter of tin, glass and brick	No
R110	Building platform	No
R111	Path to creek	No
R115	Stone-lined channel	No
R132	Old track	No

4.5 NATURAL HERITAGE

Karst formations are landforms produced by the action of natural waters on soluble rocks (most commonly, limestone and dolomite), and are characterised by gorges, caves, dolines and irregular hydrological systems (NPWS, 2006). The KNP PoM identifies geodiversity values including the eight karst areas in the park. These areas are considered as areas of local, regional, state or national significance.

The nearest karst areas are the Yarrangobilly Caves (approximately 14km to the north-east of the Project) and the Ravine areas (directly to the south of the Project).

The Ravine Karst area is located around Lobs Hole Ravine Road. Recognised deposits associated with the Ravine Karst include Devonian fossiliferous rocks, periglacial block streams and tufa deposits near Lobs Hole (refer to Figure 4-2). Tufa is a porous deposit of calcium carbonate, often with a spongy like appearance. There are two tufa deposits near the Project area these include the Cave Gully and The Lick Hole Gully deposit which are located approximately 1km south of the Project. Devonian fossils are associated with the limestone of the Lick Hole Formation and the Periglacial block streams are located over 3.2km to the south of the Project area, to the east of the Lobs Hole Ravine Road.

While there are no tufa sites within the Project area, tufa is not restricted to the points mapped, and can extend along the associated gully floors for hundreds of metres (Troedson, 2019). It is possible that tufa sites may occur closer to the Project than indicated by Figure 4-2.

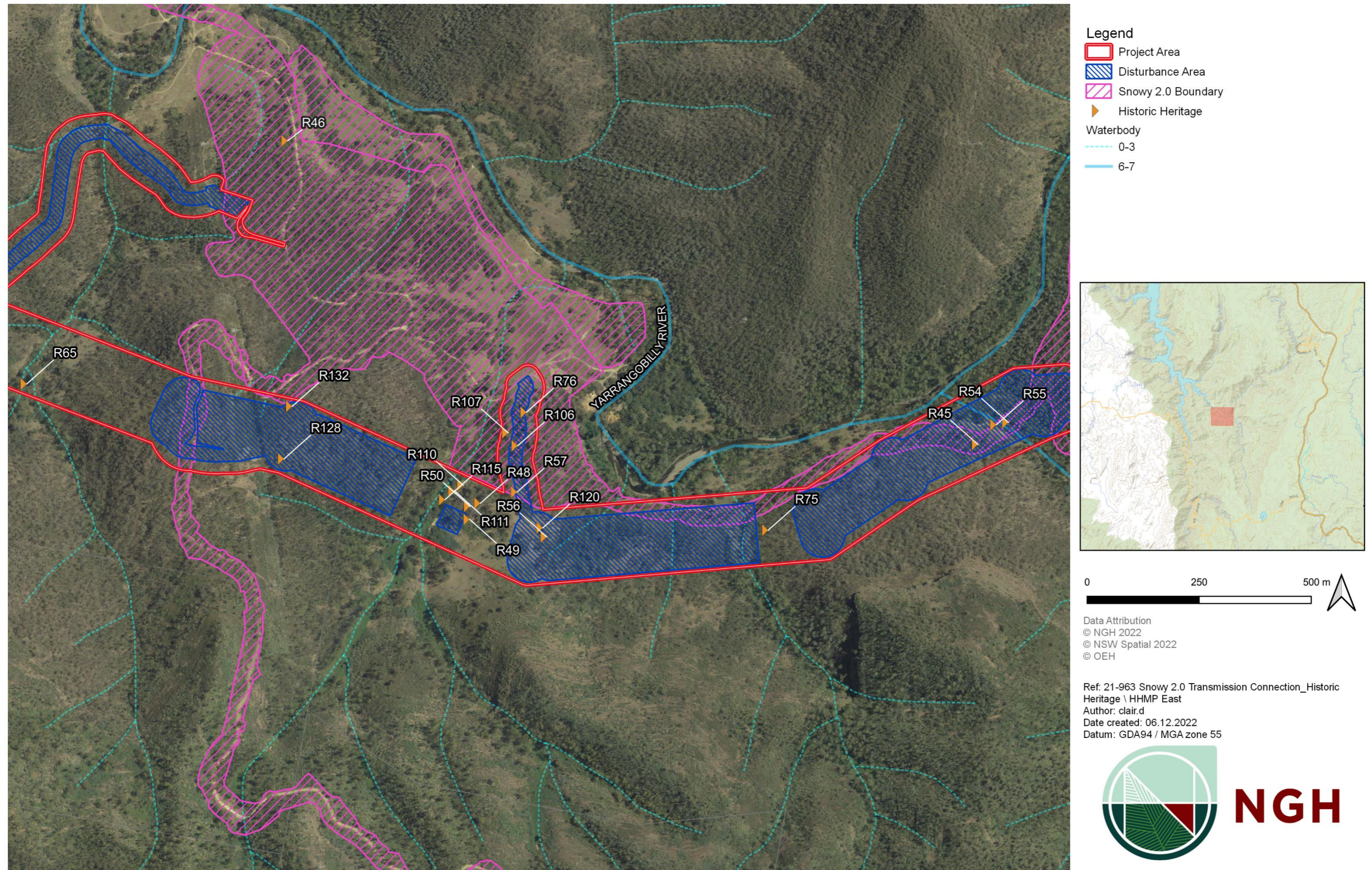


Figure 4-1 Historic heritage items within the disturbance and Project area

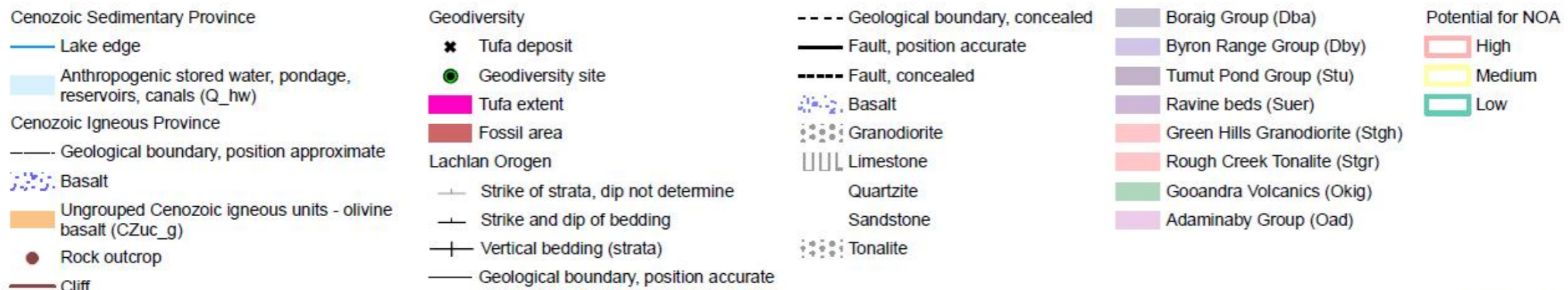
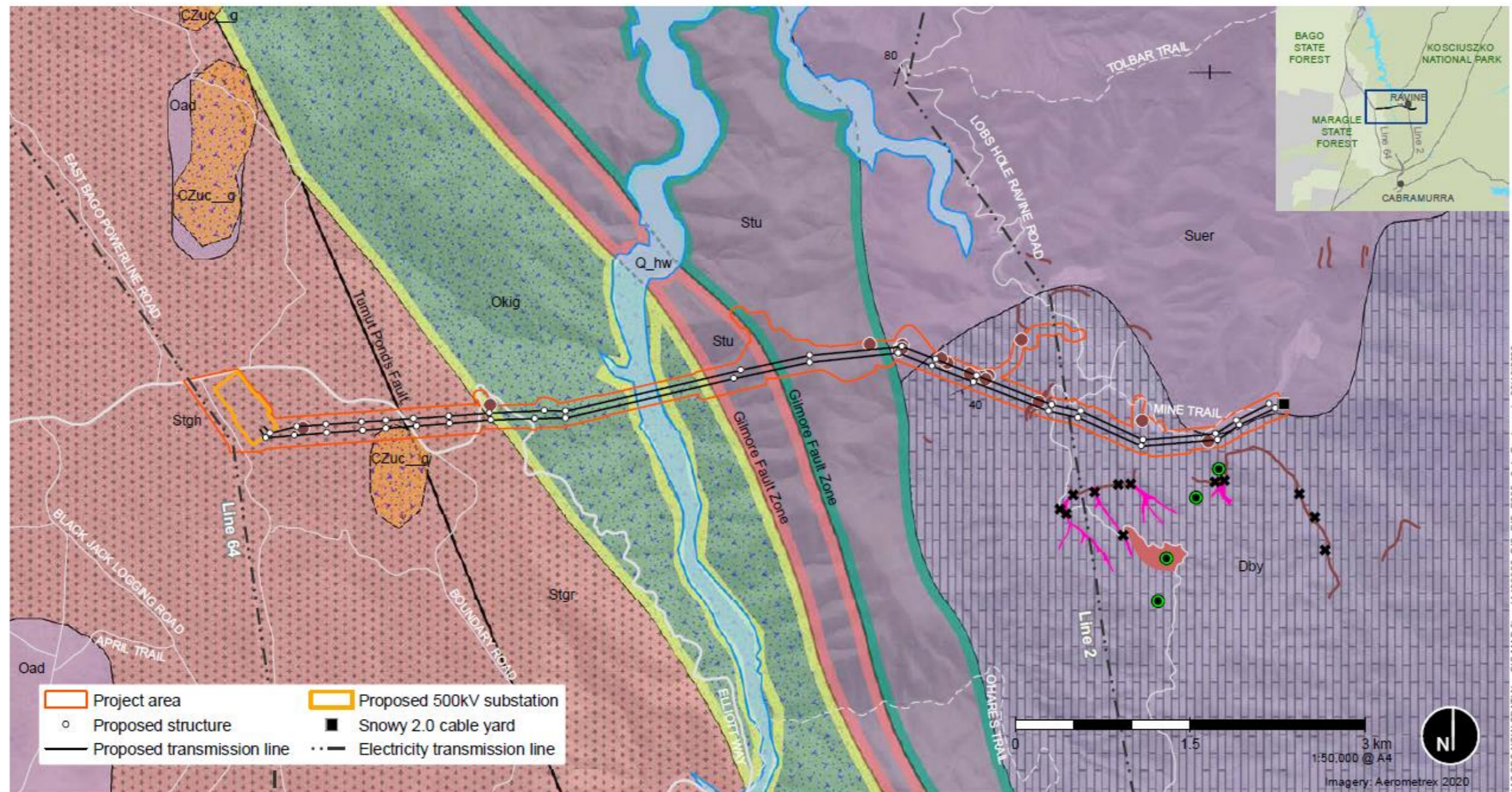


Figure 4-2 Natural heritage items (tufa and geodiversity sites) within the locality of the Project area

5 ENVIRONMENTAL ASPECTS AND IMPACTS

5.1 CONSTRUCTION ACTIVITIES

Key aspects of the Project that could result in adverse impacts to historic and natural heritage includes ground disturbance and vegetation clearance for the following key Project components:

- Construction of the new substation
- Construction of new and upgrades access tracks
- Construction of new transmission lines
- Temporary stockpile sites
- Temporary compound sites
- Landscaping/revegetation.

Additionally, any other construction activity generating vibration at a distance of 50m or less from heritage structures.

Refer also to the Aspects and Impacts Register included in Appendix E of the CEMP.

5.2 IMPACTS

5.2.1 LISTED HERITAGE ITEMS

The Project area is within the curtilage of two items on the NHL, being the Australian Alps National Parks and Reserves, and the Snowy Mountain Scheme which are MNES under the EPBC.

The Australian Alps National Parks and Reserves is made up of 11 national parks and covers approximately 1,653,180ha. The KNP is part of the Australian Alps National Parks and Reserves and covers an area of approximately 690,000ha. Approximately 195ha of the Project area is in the KNP, representing 0.028% of the KNP. It was considered that the existing heritage values would not be adversely impacted by the Project, given the Project's relatively small disturbance area within the larger curtilage of the Australian Alps National Parks and Reserves.

The purpose of Snowy 2.0 and the Project is to augment the existing hydro scheme, not to replace it. The Project would not physically affect any existing components or heritage attributes of the existing Snowy Scheme. Therefore, no significant impact is expected for either the Australian Alps National Parks and Reserves and the Snowy Mountain Scheme pursuant to section 15B of the EPBC Act.

5.2.2 DIRECT IMPACTS ON BUILT HERITAGE

The Project has potential to directly impact on the ten historic heritage items located within the disturbance area. It is identified that some of these items may have already been impacted by the construction of Snowy 2.0 and the required management measure implemented for the items. Table 5-1 provides a summary of how each item was impacted by Snowy 2.0 and would be impacted by this Project, as well as outline the recommend mitigation measures per item. The mitigation measures are further outlined in Section 6 of this plan.

Table 5-1 Historic heritage items potential impacts and management (management as per Table 7 of Appendix 3 of the COA)

ID	Site name	Impacted by Snowy 2.0	Impact of this Project	This Project management measure	Condition of Approval
R45	Lobs Hole Copper Mine Water Race	Yes (partial)	Moderate to major	Protective fencing, archival recording and archaeological test excavation (salvage, if warranted by the result of the test excavation)	Archival recording, Test excavation, salvage if warranted
R46	Large excavation	Yes	Major	Archival recording has occurred. Test excavation is a condition of project approval, with salvage required if warranted by the result of the test excavation.	Archival recording, Test excavation, salvage if warranted
R54	Site of bridge	Yes	Neutral or minor	As recommended in Snowy 2.0 if not already undertaken	Archival recording, Test excavation, salvage if warranted
R55	Brick hearth	Yes	Neutral or minor	As recommended in Snowy 2.0 if not already undertaken	Archival recording, Test excavation, salvage if warranted
R56	Excavated ditch	No	Major	Archival recording has occurred, no further recommendations	Archival recording, Test excavation, salvage if warranted
R57	Old road alignment	No	Neutral or minor	As recommended in Snowy 2.0 if not already undertaken	Archival research, Archival recording, Interpretation Plan
R106	Old road	No	Neutral or minor	As recommended in Snowy 2.0 if not already undertaken	Archival research, Archival recording, Interpretation Plan
R107	Building platform	Potential	Major	Archival recording and archaeological excavation (test and salvage, if warranted)	Archival research, archival recording, salvage moveable heritage, if warranted

ID	Site name	Impacted by Snowy 2.0	Impact of this Project	This Project management measure	Condition of Approval
					and impacts are expected, test/salvage excavation and interpretation plan
R120	Building platform	No	Major	Test excavation is a condition of project approval, with salvage required if warranted by the result of the test excavation.	Archival recording, Test excavation, salvage if warranted
R128	First school at Lobs Hole	No	Major	Test excavation is a condition of project approval, with salvage required if warranted by the result of the test excavation	Archival recording, Test excavation, salvage if warranted

5.2.3 INDIRECT IMPACTS ON BUILT HERITAGE

There is potential for the works to indirectly impact on historic heritage items that are within the Project area but outside the disturbance area. There were ten items identified within the Project area but only one item has local significance, Circular stone wall (R49). Additionally, it is identified in Table 5-1 above, that the Lobs Hole Copper Mine Water Race (R45) would only be partially impacted by the Project. Therefore, R49 and portions of the R45 that is not to be directly impact, have potential to be indirectly impact by vibration activities during construction. The Project Noise and Vibration Management Plan outlines that. Care will need to be taken if works involving use hydraulic rock breakers and vibratory rollers is required within 50m of heritage items R45 and R49. Likewise for clearing. Trees in the vicinity of remaining structures will not be directionally felled towards heritage sites or exclusion zones. This is particularly important for R49 which could be easily impacted.

5.2.4 IMPACTS ON NATURAL HERITAGE

The Project has potential to have moderate to high visual impacts on the surrounding views, visual catchments, visual corridors and outlooks of the area due to the scale and materials of the Project.

It is unlikely the Project would impact on any known areas of natural heritage. However, there is potential to discover unknown areas of karst or tufa during excavation works for the Project and in the event this is encountered an unexpected find protocol will be implemented.

6 ENVIRONMENTAL MITIGATION AND MANAGEMENT MEASURES

6.1 ARCHAEOLOGICAL EXCAVATION AND ARCHIVAL RECORDING

Table 6-1 identifies the items that will require archival recording and/ or archaeological excavations prior to construction.

Table 6-1 Items that require archival recording and/ or archaeological excavations prior to construction

ID	Site name	Condition of Approval: Archival Recording, Archival Research, Interpretation Plan	Condition of Approval: Archaeological excavation
R45	Lobs Hole Copper Mine Water Race	Archival recording	Test excavation, salvage if warranted
R46	Large excavation	Archival recording	Test excavation, salvage if warranted
R54	Site of bridge	Archival recording	Test excavation, salvage if warranted
R55	Brick hearth	Archival recording	Test excavation, salvage if warranted
R56	Excavated ditch	Archival recording	Test excavation, salvage if warranted
R57	Old road alignment	Archival research, Archival recording, Interpretation Plan	
R106	Old road	Archival research, Archival recording, Interpretation Plan	
R107	Building platform	Archival research, archival recording, salvage moveable heritage, If warranted and impacts are expected, test/salvage excavation and interpretation plan	If impacts to the site are proposed, it is a condition of the approval that the site be test and salvage excavated, if warranted.
R120	Building platform	Archival recording	Test excavation, salvage if warranted
R128	First school at Lobs Hole	Archival recording	Test excavation, salvage if warranted

It has been identified that some of these items may have already been archaeological excavated, recorded or impacted as part of the Snowy 2.0 Project. Six items (R45, R46, R54, R55, R106, R107) are located within this Project as well as the Snowy 2.0 Main Works Project area.

The approach to these items is:

- Transgrid to consult with Snowy 2.0 to confirm the status of these items.
- If still unclear, an archaeologist would undertake a site inspection to confirm the status of the items.

- If these sites have been entirely destroyed by the Snowy 2.0 Project, then the mitigation measures relating to archival recording and archaeological excavations will not apply.
- If sites are still present, archival recording and where required archaeological excavations and interpretation signs will be undertaken for each item as per Table 6-1 above.

Archival recording will be undertaken by a suitably qualified and experienced heritage consultant prior to construction and comprise of:

- A photographic record taken in digital capture in RAW and jpg or RAW and tiff formats.
- The photographic record will be prepared in accordance with the NSW Heritage Council guidelines:
 - Photographic recording of heritage items using film or digital capture (Heritage Information Series) 2006; and - How to prepare archival records of heritage items (Heritage Information Series) 1998.
- The record will include:
 - Detailed photographs of each item
 - Topographic survey using digital surveying techniques (eg total station)
 - A photographic plan.

The archaeological excavations would be undertaken by a suitably qualified and experienced historical archaeologist and comprise of:

- Preparing an Archaeological Research Design and Excavation Methodology to guide the archaeological program. It will be prepared according to Heritage Council of NSW guidelines. The methodology will be submitted for comments to the Heritage Council of NSW (or its delegate) and approval by DPE prior to the commencement of archaeological excavation.
- Undertaking of the archaeological excavations onsite prior to construction.
- Preparation of a final archaeological excavation report within 12 months of the completion of archaeological excavation. It will include details of any significant artefacts recovered, where they are located and details of their ongoing conservation and protection in perpetuity by the landowner. Copies of the final excavation report will be provided to DPE, the Heritage Council of NSW and to the local Council's local studies unit.

An Archaeological Research Design and Excavation Methodology has been prepared for the works and is included in Appendix E.

The Interpretation Plan required for R57 and R106 (and R107 if required) would be undertaken by a suitably qualified and experienced historical archaeologist in consultation with NPWS. Based on research and analysis the plan will outline a long-term strategy and policy for interpreting these heritage items. The plan will outline key themes, storylines and audiences and provide recommendations for how the interpretation of these heritage items can be communicated.

6.2 PROTECTION OF HISTORIC HERITAGE ITEMS

The boundaries of the Project disturbance area will be clearly marked with fencing to ensure that no impacts can occur to heritage sites that may be located outside of these areas. Historic heritage items within the Project area that are not to be disturbed will be demarcated (by UGL and Transgrid) using blue barricading or bunting blocking machine access to the area to be protected and signed as 'No-go Zones'. These 'no go' exclusion zones will be in place for the duration of construction. The 'No-go Zones' for

historic heritage items are to be installed by a suitably qualified and experienced heritage consultant with an appropriate buffer. The buffer would be determined based on the item and the extent and depth of any archaeological deposits.

Blue flagging and 'No-Go Zone' signage will be used to delineate and communicate areas to be protected from those areas that have been approved for construction and land disturbance as required.

These 'No-Go Zone' will be inspected as part of the weekly environmental inspection to ensure they are still in place and are effective.

6.3 HERITAGE INDUCTIONS

All contractors and staff involved in construction activities on site will undergo site induction training (or be supervised by a staff member that has had the relevant training) relating to historic and natural heritage management issues. The induction training will address elements related to heritage management including:

- Existence and requirements of this management plan.
- Relevant legislation.
- Roles and responsibilities for historic and natural heritage management.
- Location of identified historic and natural heritage sites and 'No-go Zones'.
- Existence and importance of natural heritage items within KNP and how to identify them.
- Proposed historic and natural heritage management and protection measures.
- Procedure to follow in the event of an unexpected heritage item find or discovery of human remains during construction works.

Specialised breaking ground training (i.e. kick-off training) will be recorded along with more generalised training provided to contractors and staff. Records will be kept and maintained in a register detailing names, dates, content and type of training undertaken. This HHMP must be kept on site at all times and be readily accessible. The requirements of the HHMP and the unexpected finds protocols should be incorporated into toolbox talks, and the mapping presented in this report should be reviewed and management measures assessed to ensure that impacts beyond the Project approval are unlikely to take place.

6.4 UNEXPECTED FINDS

The possibility exists that historic heritage items or natural heritage areas may be uncovered during clearing works and ground disturbance. It is therefore important that operators remain cautious when undertaking clearing works and ground disturbance to avoid disturbing any sub-surface historic heritage items or natural heritage that may be present. It is important that all workers and contractors are educated on the potential for historic and natural heritage items through the Heritage Inductions as part of the site induction.

In the event that a historic heritage item is identified during construction works, works will cease at the location and no further harm to the object will occur. The find will be immediately reported to Transgrid, NPWS and Heritage NSW, and fenced off with a minimum of a 50m buffer. No work will commence within 50m of the find until any required approvals have been given by Heritage NSW. In the event that skeletal remains are encountered during the activity, works must stop immediately, the area secured to prevent unauthorised access and Transgrid, NPWS, NSW Police and Heritage NSW (via the EnviroLine) contacted. The NSW Police forensics will need to determine whether the skeletal remains belong to a criminal investigation.

In the event that an area of natural heritage such as karst or tufa is discovered during construction works, works will cease at the location and no further harm to the area will occur. The find will be immediately reported to Transgrid, NPWS and Heritage NSW. No work will commence in the vicinity of the find until further advice is provided by NPWS and Heritage NSW.

The procedure outlined in Appendix B must be followed.

Table 6-2 Historic and natural heritage mitigation measures

ID	Measure/requirement	Resources needed	When to implement	Responsibility	Reference
General					
HH1	Implementation of approved HHMP	This document	Pre-construction Construction	Construction Manager Senior Environmental Advisor (SEA)	COA B24
HH2	A copy of the HHMP should be kept on site during construction and operation of the Project and be readily available for reference, if and as required.	This document	Pre-construction Construction	Construction Manager SEA Transgrid	Best practice
HH3	<p>Training will be provided to all Project personnel, including relevant subcontractors on historic and natural heritage requirements from this plan through inductions, toolboxes, and targeted training. Training would describe the heritage values of the Project area and the procedures to be followed in the event of discovery of artefacts or bones (potential human remains).</p> <p>Training will include details of the likely presence of unrecorded historic heritage (due to thick vegetation cover) and historical unmarked graves. Training would include reference to the protection of historic heritage located outside of the approved disturbance zones.</p> <p>Training will also include the identification and potential presence of natural heritage items such as karst and tufa within the Project area.</p>	<p>Induction package</p> <p>Toolbox training material</p> <p>Targeted training material</p>	Pre-construction Construction	Construction Manager SEA	COA B24 L8
HH4	Relevant historic and natural heritage management measures from this plan will be included in site environmental documents including for example, Environmental Work Method Statements (EWMS) and/or Site Environmental Plans (SEPs).	CEMP	Pre-construction Construction	SEA	Best practice

ID	Measure/requirement	Resources needed	When to implement	Responsibility	Reference
HH5	During detailed design, if the disturbance area changes but is still within the Project area, a consistency assessment will be prepared to confirm if impacts are consistent with the EIS.	Design drawings	Pre-construction Construction	Transgrid SEA	NH1
Procedures and plans					
HH6	A historic and natural heritage management plan will be prepared for the Project. The plan should clearly outline measures for their protection (where applicable) and details of further investigation and archaeological archival recording where appropriate.	This Plan	Pre-construction	UGL/Transgrid	COA B24 NH2
Pre-construction					
HH7	The boundaries of the Project disturbance will be clearly marked with fencing to ensure that no impacts can occur to historic and natural heritage sites that may be located outside of the areas.	SAPs	Pre-construction Construction	Heritage Consultant SEA	COA B22 COA B24 L8
HH8	Historic heritage sites within the Project area that are not be disturbed will be demarcated (by UGL and Transgrid) using blue barricading or bunting and signed as 'No-go Zones'. These 'no go' exclusion zones will be undertaken by a suitably qualified and experienced heritage consultant. The consultant will determine an appropriate buffer. The exclusion zones will be put in place at least 7 days prior to any construction works occurring and remain in place for the duration of construction.	SAPs	Pre-construction Construction	Heritage Consultant SEA	COA B22 COA B24
HH9	If required complete archival recording, archival research, interpretation plan and archaeological excavations for each item outlined in Section 6.1.	Personnel	Pre-construction	Heritage Consultant	NH4 NH5 COA B24

ID	Measure/requirement	Resources needed	When to implement	Responsibility	Reference
HH10	<p>If archaeological excavations are required:</p> <ul style="list-style-type: none"> Transgrid will nominate a suitably qualified and experienced historical archaeologist to manage the historical archaeological program. This person must fulfil the Heritage Council's Excavation Director Criteria 2019 for the excavation of locally significant archaeological sites Archaeological Research Design and Excavation Methodology will be prepared to guide the archaeological program. It will be prepared according to Heritage Council of NSW guidelines. The methodology will be submitted for comments to the Heritage Council of NSW (or its delegate) and approval by DPE prior to the commencement of archaeological excavation A final archaeological excavation report will be prepared within 12 months of the completion of archaeological excavation. It will include details of any significant artefacts recovered, where they are located and details of their ongoing conservation and protection in perpetuity by the landowner. Copies of the final excavation report will be provided to DPE, the Heritage Council of NSW and to the local Council's local studies unit, and NSW Parks & Wildlife Service for record and circulation within the Conservation and Aboriginal Partnerships Divn. 	Personnel	Pre-construction	Heritage Consultant	NH3 COA B23 COA B24
Construction					
HH11	Where any additional, unrecorded historic and natural heritage items or areas are encountered during constructions the Unexpected Finds Procedure will be followed.	Unexpected Finds Procedure Appendix B	Construction	Construction Manager SEA All personal	NH6 COA B24
HH12	If human remains are discovered on site, then all work surrounding the area must cease, and the area must be secured. The Unexpected Finds Procedure will be followed to notify police and Heritage NSW as soon as possible. Work must not recommence in the area until this is authorised by Heritage NSW.	Unexpected Finds Procedure Appendix B	Construction	Construction Manager SEA	NH6 COA B24

ID	Measure/requirement	Resources needed	When to implement	Responsibility	Reference
				All personal	
HH13	In the event that a heritage item(s) outside of the approved Project area are damaged, UGL and Transgrid must advise Heritage NSW and NPWS immediately. Heritage NSW can be contacted through the Environment Line on 131 555 as soon practicable. An appropriate no go zone area must be established until the area can be inspected and advice sought from Heritage NSW on how to proceed.		Construction	Construction Manager SEA Transgrid	COA B24
HH14	Monitoring of heritage sites and effectiveness mitigation measures outlined in this plan will be undertaken weekly as per the weekly environmental inspection. Further monitoring would be undertaken during Transgrid inspections and Project audits.	Section 9.1 CEMP	Pre-construction Construction	SEA Transgrid	COA B24
HH15	Implement noise and vibration management plan to reduce potential impacts on R49 and R45 from vibration.	NVMP	Construction	SEA	Best Practice

7 COMPLIANCE MANAGEMENT

7.1 RESPONSIBILITIES

UGL's organisational structure and overall roles and responsibilities are outlined in Section 4.11 of the CEMP. Specific responsibilities for the implementation of environmental controls are detailed in Table 6-2 of this Plan and the roles and responsibilities relevant to this plan are outlined in Table 7-1 below. Further details regarding specific responsibilities for the implementation of environmental and heritage controls are detailed in the CEMP.

Table 7-1 Roles and Responsibilities

Roles	Responsibilities
Project Manager (PM)	<ul style="list-style-type: none">• Ensure all non-conformance events are investigated and corrected.• Stop work or otherwise mitigate effects of an activity that is causing harm to heritage items.• Approve the HHMP and subsequent revisions.• Ensure resources are made available to enable works to comply with CEMP and other environmental management requirements.• Ensure appropriate approvals and licences are held.• Ensure all staff and contractors are aware of environmental compliance requirements and environmental controls
Construction Manager (CM)	<ul style="list-style-type: none">• Ensure that any changes to the schedule of works are communicated to the SEA/HSE in a timely manner, if environmental aspects are likely to become affected.• Ensure works proceed with all necessary approvals.• Ensure that all site personnel and subcontractors are aware of their responsibilities.• Stop work or otherwise mitigate the effects of an activity if historic heritage is an issue.
Senior Environmental Advisor (SEA)/ HSE Advisor	<ul style="list-style-type: none">• Motivate HHMP compliance.• Confirm that all necessary historic heritage controls are implemented and maintained for the duration of the contract.• Assist with investigation of all non-conformance events are investigated and corrected.
Employees and Subcontractors	<ul style="list-style-type: none">• Stop work immediately when an unexpected heritage find is encountered. Cordon off area until SEA advises that work can recommence.
Heritage Consultant	<ul style="list-style-type: none">• Acting as an environmental subcontractor, specialist work as required.• Operate as instructed by the Project Manager/ Project Owner in compliance with all environmental requirements.• Undertake archival recording, research, excavations and Interpretation Plans of sites as approved in the COA and complete subsequent reporting.

7.2 TRAINING

To ensure that this HHMP is effectively implemented, each level of management is responsible for ensuring that all personnel reporting to them are aware of the requirements of this plan.

All site personnel will undergo the UGL site induction training relating to historic and natural heritage management issues. The induction training will address elements related to historic and natural heritage management including:

- Existence and requirements of this HHMP.
- Relevant legislation.
- Roles and responsibilities for historic and natural heritage management.
- The location of known heritage items and no-go areas.
- The HHMP procedures to be followed prior to and during the construction of the Project, including the unexpected finds procedure.
- The management and mitigation of impacts to historic and natural heritage.
- The identification of historic objects and historic burials and skeletal material.

Targeted training in the form of toolbox talks or specific training will also be delivered to personnel with a key role in historic heritage management. Examples of training topics include:

- The unexpected finds procedure.
- Identification of natural heritage items.

All training will be undertaken and records kept in accordance with the COA B24 (vi) which notes the requirement to ensure workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions.

A refresher induction and/or additional training should be implemented following any incident which involves heritage. If future revision of the HHMP occurs it must be considered if a refresher induction and/or additional training should be undertaken.

Further details regarding staff induction and training are outlined in Section 6 of the CEMP.

7.3 MONITORING AND INSPECTION

Inspections of sensitive areas and activities with the potential to impact historic and natural heritage will occur for the duration of the Project. The fencing of the known heritage items which are not approved to be impacted as listed in the COA will be undertaken a minimum of 7 days prior to any construction works occurring. Inspection of these sites will occur weekly during construction and every six (6) months thereafter by the SEA.

Requirements and responsibilities in relation to monitoring and inspections are documented in Section 9 of the CEMP.

Specifically related to historic and natural heritage, during construction the effectiveness of the heritage protection measures would be inspected, monitored, and reported on weekly as part of the Weekly Environmental Inspection. Further inspection, monitoring and reporting would also be undertaken as part of the regular inspections with Transgrid, as detailed Section 9 of the CEMP.

Upon completion of the works, a short report will be prepared, documenting the effectiveness of the HHMP measures.

A copy of the report will be provided by Transgrid to Heritage NSW and Heritage Council of NSW. It will also be made publicly available.

7.4 CONTINGENCY PLAN, REPORTING AND INCIDENTS

Contingency plan, reporting requirements and responsibilities are documented in Section 9.4 the CEMP and would comply with the COA for this Project.

7.4.1 INCIDENT AND NON- COMPLIANCE NOTIFICATION AND REPORTING

An incident is defined in the COA as an occurrence or set of circumstances that causes or threatens to cause material harm and which may not be or cause a non-compliance. Material Harm is harm that:

- Involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial; or
- Results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment)

This definition excludes “harm” that is authorised under either the approval for this Project or any other statutory approval.

Non-compliance is defined in the COA as an occurrence, set of circumstances or development that is a breach of the consent but is not an incident.

Details on incident reporting is included in Section 8 of the CEMP. Any compliance issues will be recorded and raised with the relevant authorities in writing via the Major Projects website. The incident reporting and non-compliance reporting requirements are outlined in C7, C8, C9 and Appendix 5 of the conditions of consent are outlined in Table 7-2 below. The requirements for written notification of an incident which must be followed if heritage items outside the approved disturbance area are damaged and/or in any instance of an incident of non-compliance matter relating to historic heritage items outlined in Appendix 3 of the conditions of consent and listed below in Table 7-3.

Table 7-2 Reporting COA as per Schedule 5 Conditions 7 to 9

CoA Schedule Condition	Compliance Task	Compliance requirement
C7	Incident Reporting	The Department and NPWS must be notified via the Major Projects website portal immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 5.
C8	Non-Compliance Reporting	The Planning Secretary and the NPWS must be notified in writing via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance
C9		A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.

Table 7-3 Written incident notification requirements

#	WRITTEN INCIDENT NOTIFICATION REQUIREMENTS
1	A written incident notification addressing the requirements set out below must be notified to the Department via the Major Projects website within seven days after the Proponent becomes aware of an incident. Notification is required to be given under this condition even if the Proponent fails to give the notification required under condition C7 or, having given such notification, subsequently forms the view that an incident has not occurred.
2	<p>Written notification of an incident must:</p> <ul style="list-style-type: none"> (a) Identify the development and application number; (b) Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); (c) Identify how the incident was detected; (d) Identify when the applicant became aware of the incident; (e) Identify any actual or potential non-compliance with conditions of consent; (f) Describe what immediate steps were taken in relation to the incident; (g) Identify further action(s) that will be taken in relation to the incident; and (h) Identify a Project contact for further communication regarding the incident.
3	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Proponent must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.
4	<p>The Incident Report must include:</p> <ul style="list-style-type: none"> (a) A summary of the incident; (b) Outcomes of an incident investigation, including identification of the cause of the incident; (c) Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and (d) Details of any communication with other stakeholders regarding the incident.

7.4.2 CONTINGENCY PLAN AND REPORTING HUMAN REMAINS

If any human remains or suspected human remains are discovered during any works, all activity in the area must cease immediately and the Unexpected Finds Protocol which is provided in Appendix B of this Plan must be followed to report the find. The NSW Police must be notified immediately. Details of the location and nature of the human remains must be provided to the relevant local police. If there are reasonable grounds to believe that the remains are Aboriginal, Heritage NSW must also be contacted as soon as practicable and you must provide any available details of the remains and their location.

Heritage NSW Environment Line can be contacted on 131 555. If the find is determined to be Aboriginal, Heritage NSW will provide advice on any additional reporting requirements.

7.4.3 CONTINGENCY PLAN AND REPORTING UNEXPECTED FINDS

If any previously unidentified heritage items are found the Unexpected Finds Protocol which is provided in Appendix B of this Plan must be followed to report the find to the UGL Supervisor, who will notify the UGL Project Manager. If the find it is determined to be covered under approved condition of consent the item will be recorded in line with the mitigation methods noted in the HHMP.

7.5 AUDITING

Audits (both internal and external) will be undertaken to assess the effectiveness of environmental controls, compliance with this sub plan, infrastructure approval and other relevant approvals, licenses, and guidelines. Audit requirements are detailed in Section 9.3 of the CEMP.

Non-Aboriginal cultural heritage must be included within any major environmental audit of impacts undertaken during the construction phase.

Audit requirements are detailed in the CEMP and must comply with the CoC C10:

Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020).

The frequency includes within 3 months of commencing construction; and within 3 months of commencement of operations. Each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary. Unless otherwise agreed by the Planning Secretary.

8 REVIEW AND IMPROVEMENT

8.1 CONTINUOUS IMPROVEMENT

Continuous improvement of this Plan will be achieved when opportunities for improvement are identified. Any proposed improvement and/or changes to this Plan are required to be approved by the Planning Secretary prior to implementation except within exception of COA C3 if the Planning Secretary agrees, a plan may be staged or updated without consultation being undertaken with all parties required to otherwise be consulted with. If approved by the Planning Secretary, updated plans supersede the previous versions of them and must be implemented in accordance with the condition that requires the plan. Prior to any actions to this plan occurring in line with COA C3 this must be approved for implementation in writing by the Planning Secretary.

The continuous improvement process will be designed to:

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

8.2 HHMP UPDATE AND AMENDMENT

During the Project, a hard copy of the most recent version of this Plan will be stored at the main site compound. It is the responsibility of the SEA to ensure this hard copy is the most recent version and to remove older versions of the plan once they are superseded at the main site compound.

The processes and plans described in the CEMP may result in the need to update or revise this Plan. Any revision of the HHMP is to ensure it incorporates any recommended measures to improve the environmental performance of the Project. Any proposed changes to this Plan are required to be approved by the Planning Secretary prior to implementation unless approvals in line with COA C3 are approved for implementation in writing by the Planning Secretary for this Plan.

A copy of the updated HHMP with any changes, once approved by the Planning Secretary, will be distributed to all relevant stakeholders in accordance with the approved document control procedure (refer to the CEMP).

As a minimum the HHMP should be updated within three (3) months following the completion of the long-term management measures and/or the Project of the final design.

In the instance of any modification to the COA, or issue of direction from the Planning Secretary the HHMP would be reviewed and if revisions of the plan is required the plan would be submitted to the Planning Secretary for approval within 3 months of that change.

In the instance of an incident report or an audit report which notes non-compliance for Historic Heritage the HHMP will be reviewed within 1 month. and if revisions of the plan are required the plan will be submitted to the Planning Secretary for approval and comply with the COA C2 (Revision of Strategies, Plans and Programs) and COA C3 (Updating and Staging of Strategies, Plans and Programs).

9 ACCESS TO INFORMATION

The CEMP details the processes that will be used to keep the local community and relevant agencies informed about the operation and environmental performance of this Project. The main point of contact with DPE for this Project will be via the Major Projects website and all community consultation will be managed by Transgrid throughout the duration of the Project.

While a number of steps will be implemented in order to engage with the community and other stakeholders throughout the various stages of the development as detailed in the CEMP and CCP, one of the main portals for community engagement will be via the Project website (<https://www.transgrid.com.au/projects-innovation/snowy-2-0-connection>):

The website will be used to provide updates as relevant about the progress of the Project and heritage outcomes. The overarching Heritage Management Plan, including this Historic Heritage Management Plan, will be available on the website in accordance with Condition C11 at all times during the lifetime of the development.

The website will be regularly updated throughout development works and include information such as:

- Layout and general overview of the development.
- How complaints about the development can be made and a complaints handling procedure.
- Contact details of the Proponent or online contact form.

A link to the Major Projects website is also provided, which contains information relating to:

- The EIS.
- Current statutory approvals for the development.
- Modification to this Projects COA.

The procedures for dispute resolution will be undertaken in accordance with the Complaint's Procedure which is detailed in the CEMP. All complaints received via post, phone, email or the project website during construction will be recorded and responded to. It is the intention of the Proponent, Project Manager and their contractors to maintain an open and clear relationship with all stakeholders to prevent complaints from arising. Should the resolution of a complaint not be able to be reached by both parties, following presentation of investigation results to the complainant, either party may refer the dispute to an independent mediator and/or follow the steps outlined in the complaints procedure as detailed in the EMS.

10 REFERENCES

- EMM. (2019). *Environmental Impact Statement: Snowy 2.0 Main Works EIS*. Prepared for Snowy. EMM Consulting.
- Jacobs. (2021). *Appendix G Non-Aboriginal Heritage Assessment Snowy 2.0 Transmission Connection Project EIS*. Jacobs Pty Ltd.
- Jacobs. (2020). *Snowy 2.0 Transmission Connection Project EIS*. Jacobs Pty Ltd.
- NPWS. (2006). *Kosciuszko National Park - Plan of Management*. National Parks and Wildlife Service.
- NSW Archaeology. (2018). *Appendix P: Snowy 2.0 Exploratory Works: Historic Cultural Heritage Assessment*, Unpublished report to Snowy Hydro Ltd.
- NSW Archaeology. (2019). *Historic Cultural Heritage Assessment*, Snowy 2.0 Main Works.
- NSW Heritage Office. (2001). *Assessing Heritage Significance - A NSW Manual Update*.
- Transgrid (2021). *Snowy 2.0 Transmission Connection Project Amendment Report*.
- Troedson, A. (2019) *Cenozoic Geodiversity Assessment Report – Snowy 2.0 Main Works*. Available at <https://emmdigital.com.au/Snowy2.0MainWorksSummary/downloads/Appendix-O.2-Cenozoic-geodiversityassessment.pdf>

APPENDIX A CONSULTATION EVIDENCE



Heritage NSW

Our ref: DOC22/1131567

Vince Chaplin
Senior Environmental Advisor
Transgrid
180 Thomas Street
Sydney NSW 2000

By email: vincent.chaplin@transgrid.com.au

Dear Mr Chaplin

Post Approval review of Historic Heritage Management Plan for Snowy 2.0 Transmission Connection (SSI-9717)

Thank you for your referral dated 20 December 2022 inviting comments from the Heritage Council of NSW on the Historic Heritage Management Plan for the State Significant Infrastructure (SSI) proposal.

The proposed SSI project area does not include/is not located within a State Heritage Register (SHR) item. It is located approximately 10km east of *Matthews Cottage* (SHR No 00998) and *Kiandra Courthouse/Chalet* (SHR No 00994). The project is within the curtilage of two items on the National Heritage List (NHL) including the *Australian Alps National Parks and Reserves* and the *Snowy Mountains Scheme*.

As delegate of the Heritage Council of NSW, I have reviewed the draft historic Heritage Management Plan and note the findings and recommendations of the report including the Non-Aboriginal Archaeological Research Design and nominated Excavation Director information. It is considered that the document sufficiently addresses the conditions of consent and that no further comment is required under the *Heritage Act 1977*.

This letter is provided in relation to Environmental Heritage only, as managed under the *Heritage Act 1977*.

If you have any questions regarding the above advice, please contact Mariyam Nizam, Senior Assessments Officer, at Heritage NSW on 88376375 or Mariyam.Nizam@environment.nsw.gov.au.

Yours sincerely

Rajeev Maini

Rajeev Maini

Manager, Assessments South
Heritage NSW
Department of Planning & Environment
As Delegate of the Heritage Council of NSW
7 February 2023

Locked Bag 5020 Parramatta NSW 2124
P: 02 9873 8500 ■ E: heritagemailbox@environment.nsw.gov.au

APPENDIX B UNEXPECTED FINDS PROCEDURE

Introduction

This unexpected find protocol has been developed to provide a method for managing unexpected historic and natural heritage items identified during the Project works.

What is a Heritage Unexpected Find?

An unexpected heritage find is defined as any possible heritage items, that was not identified or predicted by the Projects heritage assessment and is not covered by appropriate permits or development consent conditions. Such finds have potential to be significant and may need to be assessed prior to development impact.

Unexpected heritage find may include:

- Relics may appear as structure (or ruins) comprised of bricks, sandstone (or other rock), timber and accumulations of artefacts such as broken ceramic and glass.
- Human skeletal remains.
- Natural heritage items such as tufa or karst.

Historic Heritage items

A 'relic' under the Heritage Act is defined as any deposit, object or material evidence that:

- Relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement.
- is of State or local heritage significance.

Unexpected find management procedure

In the event that any unexpected heritage items are unexpectedly discovered during the Project, the following management protocols will be implemented. This procedure is also outlined in the flow chart provided below. Note: this process does not apply to human or suspected human remains. Follow Section Human Skeletal Remains below if remains or suspected remains are encountered.

1. Works within the immediate identified heritage location will cease. Personnel should notify their supervisor of the find, who will notify the project manager.
2. Establish whether the unexpected find is located within an area covered by approved Development Consent, if it is, go to Item 3. If not go to Item 4.
3. If the unexpected find is determined to be covered under the existing approved development footprint for the Development Consent for the Project undertake the following steps:
 - a. Establish an appropriate buffer to allow for the assessment and management of the find. All site personnel will be informed about the buffer zone with no further works to occur within the buffer zone.
 - b. A heritage specialist or the Project Archaeologist will be engaged to assess the item encountered and undertake appropriate recording, salvage or excavation of the site, if required, in line with the mitigation methods noted in this HMP.
 - c. Following appropriate salvage of the unexpected find works may continue at this location.

4. If the unexpected find is not covered under the existing approved development footprint for the Development Consent for the Project undertake the following steps.
 - a. All works at this location must cease.
 - b. An appropriate buffer zone of at least 20 metres to allow for the assessment and management of the find must be established. All site personnel will be informed about the buffer zone with no further works to occur. A temporary exclusion area would be established around this buffer zone.
 - c. A heritage specialist or the Project Archaeologist will be engaged to assess the Aboriginal place or object encountered.
 - d. The discovery of a heritage item will be reported to the local office of Heritage NSW and NPWS and works will not recommence at the heritage place or object until advised to do so by Heritage NSW.
 - e. If the unexpected find can be managed in situ, works at the location will not recommence until appropriate heritage management controls have been implemented, such as protective fencing.
 - f. If the unexpected find cannot be managed in situ, works at the heritage location will not recommence until further assessment is undertaken and appropriate permits and approvals to impact the item are approved and issued by Heritage NSW.

For unexpected natural heritage items NPWS will be engaged and consulted with to ensure the appropriate requirements and mitigations are implemented.

Unexpected Human Skeletal Remains

If any human remains or suspected human remains are discovered during any works, all activity in the area must cease immediately. The following plan describes the actions that must be taken in instances where human remains, or suspected human remains are discovered. Any such discovery at the activity area must follow these steps.

Discovery:

- If any human remains or suspected human remains are found during any activity, works in the vicinity must cease and the Project Manager must be contacted immediately.
- The remains must be left in place and protected from harm or damage. To protect the remains until their origins can be determined high visibility markers or temporary fencing which will not cause ground disturbance must be immediately placed a minimum of 10 m around the location of the human remains or suspected human remains by site personnel. A minimum no work buffer zone radius of 50 m must be implemented around the remains by taping off the area as an environmental sensitive zone.
- All personnel should then leave the fenced off area immediately.
- The Environmental Officer is responsible to ensure that these temporary measures are implemented onsite within 24 hours of identification.

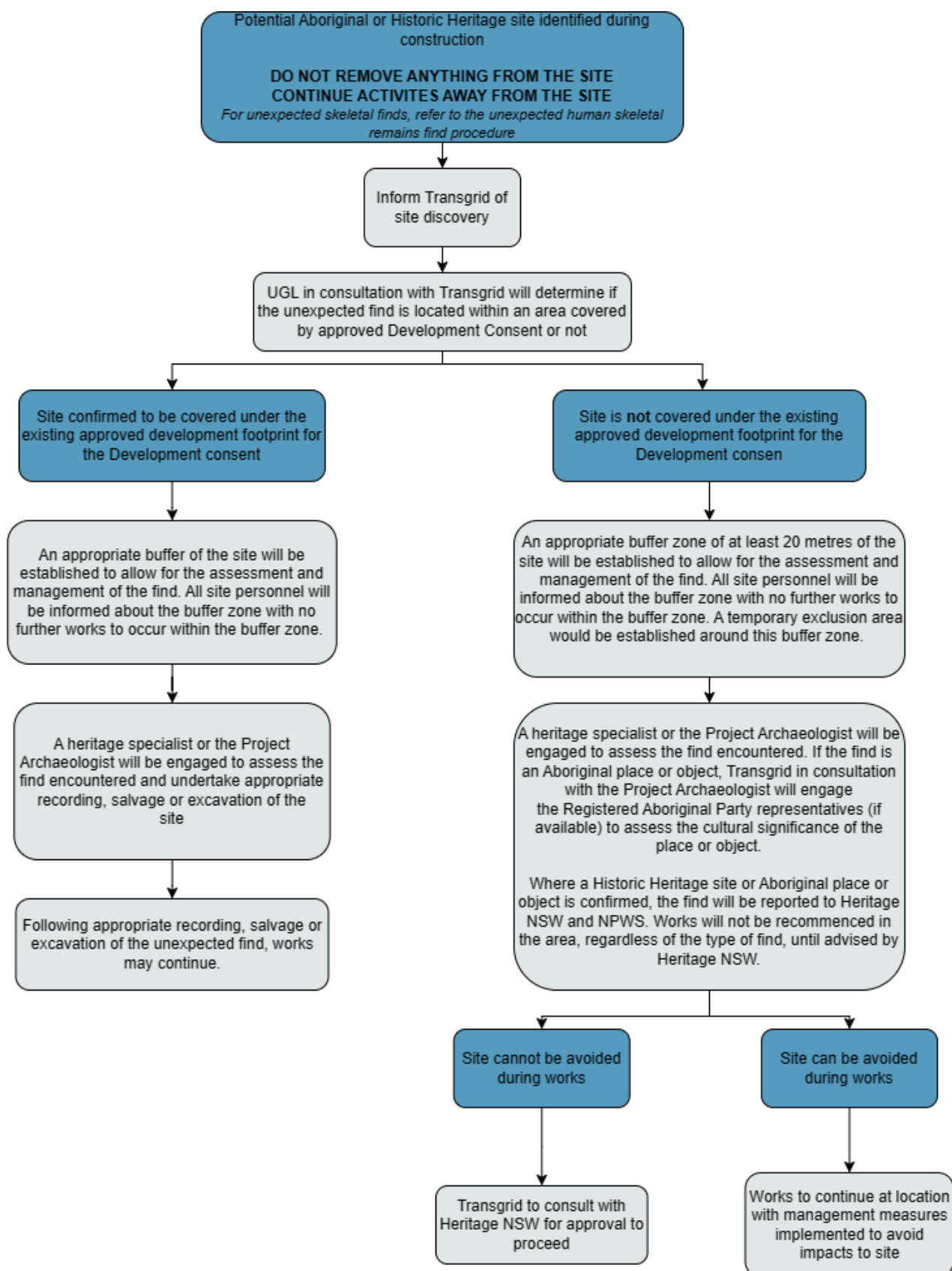
Notification:

- The NSW Police must be notified immediately. Details of the location and nature of the human remains must be provided to the relevant authorities.
- If there are reasonable grounds to believe that the remains are Aboriginal, the following must also occur:
- Heritage NSW must be contacted as soon as practicable, and you must provide any available details of the remains and their location. Heritage NSW Environment Line can be contacted on 131 555.

- The relevant Aboriginal community groups must be notified immediately when the remains are confirmed to be Aboriginal, as advised by Heritage NSW.
- The relevant Project Archaeologist may be contacted to facilitate communication between the police, Heritage NSW and Aboriginal community groups.

Process:

- If the remains are considered to be Aboriginal by the Police and Heritage NSW no work can recommence at the particular location unless authorised in writing by Heritage NSW
- Recording of Aboriginal ancestral remains must be undertaken by, or be conducted under the direct supervision of, a specialist physical anthropologist or other suitably qualified person.
- Archaeological reporting of Aboriginal ancestral remains must be undertaken by, or reviewed by, a specialist physical anthropologist or other suitably qualified person, with the intent of using respectful and appropriate language and treating the ancestral remains as the remains of Aboriginal people rather than as scientific specimens.
- If the remains are considered to be Aboriginal by the Police and Heritage NSW, an appropriate management and mitigation, or salvage strategy will be implemented following further consultation with the Aboriginal community and Heritage NSW.



APPENDIX C HISTORIC HERITAGE NEW FIND

Heritage New Find Tool

This form is to be used to record information about Heritage New Finds as required under the Heritage Management Procedure.

Located by:			
Date:		Time:	
Project:		PM:	
General Information			
Location: (GPS coordinates, Tower Location, and other identifiable features)	<< GPS location (E.g. MGA94 Zone 56J 675995mE 7129167mN)>> <<Please attach picture, drawings etc to form>>		
Heritage Areas and Objects			Please Tick
Heritage			
Individual Artefact (<i>stone artefact, stone tool, wooden artefact, glass artefacts</i>)			
Artefact Scatter (<i>two or more artefacts/ tools together</i>)			
Scarred Tree			
Hearths (<i>remains of a fireplace – often indicated by baked clay or grouped hearthstones</i>)			
Shell Scatter/Midden			
Grinding Grooves			
Rock Art			
Engravings			
Story Place (<i>document the reason you've come to this conclusion</i>)			
Landscape features (<i>e.g. resource point</i>)			
Historical Building (<i>including remains</i>)			
Historical (<i>archaeological</i>) object or material			
Burials/ Skeletal Remains or evidence of Human Remains			
Heritage Items			
<<Insert other>>			
Other:			
Submitted to PM:		Date/Time:	

Once complete please upload to Synergy and provide copy to the National Environmental Manager.

APPENDIX D HISTORIC HERITAGE SIGN OFF

Heritage Sign Off

Tool

Project:		Division:	
Project No:		Completed By:	
Date of Pegging:		Exclusion Zone:	
GPS Points as per UGL Drawing:			
GPS Points as per <<Insert Group>> Monitor Advice:			
Heritage Area located between project Pole Numbers:			
No.	Activity Description	UGL Rep Signature	<Insert Group>> Monitor Signature
1	Star Dropper Location		
1.1	Location of Heritage Exclusion zone pegged as per UGL Drawing exclusion zone		
1.2	Dropper located as per <<Insert Group>> Monitor Advice		
2	Star Dropper Driven Depth		
2.1	Mark star droppers at 300mm for depth and drive down to mark		
3	<<Insert Colour>> Flagging		
3.1	<<Insert Colour>> Flagging erected around the entire exclusion zone		
3.2	<<Insert Colour>> Flagging partially erected on the alignment to identify the exclusion zone		
4	Exclusion Zone Signage		
4.1	Signage erected on all flagged approach faces of the exclusion zone		
5	Exclusion Zone Inspection		
5.1	Exclusion zone inspected for any ground disturbance (any ground disturbance must be recorded in the comments section and detailed photos attached)		
6	Completion		
6.1	All materials and area cleaned up prior to demobilising		
6.2	Photos taken of zone completed		

Comments:

REVIEW & ACCEPTANCE			
UGL Representative		<<Insert Group>> Heritage Monitor	
Name		Name	
Position		Position	
Date		Date	
Signature		Signature	

Description:

Picket No.	GPS Co-ordinates (At points where direction changes)	
1		
2		
3		
4		

APPENDIX E ARCHAEOLOGICAL RESEARCH DESIGN & EXCAVATION METHODOLOGY



ABN 53106044366

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Central Tilba NSW 2546
Mob. 0427074901
www.nswarchaeology.com.au

25 November 2022

Kim Lembke
UGL Pty Limited
Level 7, 40 Miller St
North Sydney NSW 2060

Dear Kim

*Maragle 330kV Switching Station and 330 kV Transmission Line Connections
SSI-97171 - Archaeological Research Design and Excavation Methodology*

The historic heritage impact mitigation program would be conducted in accordance with Project Conditions of Approval and the Historic Heritage Management Plan. While all efforts will be made to avoid impacts to areas of potential archaeological significance within the disturbance area it is possible that certain historic sites will require implementation of impact mitigation measures, one of which is test excavation, salvage if warranted.

This document sets out the archaeological research design and excavation methodology to guide the archaeological program for areas in which test excavation, and salvage if warranted, would occur.

Project Aims and Objectives

The primary aim of the historical heritage mitigation program is to minimise the potential loss of information associated with direct impacts to the fabric of heritage items and their associated archaeological deposits and/or setting. A secondary aim is to offset the loss of such tangible and other less tangible heritage values (e.g. aesthetic and social values) through archiving as much information as possible in relation to the various geographic areas, themes, site types, features and objects/artefacts that relate

to the history of human use and interaction with the alpine environment of the Snowy Mountains, specifically in Lobs Hole. A third aim is the physical conservation of:

- items, complexes and landscapes of cultural heritage significance; and
- artefact assemblages and individual items of moveable heritage.

These aims are accompanied by a series of objectives underpinning the research design, including consideration of the Snowy 2.0 heritage works currently being undertaken. The key objectives of this archaeological research design are:

- to implement best practice recording and documentation at all levels (i.e. archival recording, salvage of moveable heritage, archaeological excavations, post excavation analysis and subsequent reporting and publication of results) of the historical heritage management program;
- the integration of results of the historical heritage management program to maximise the potential to address research questions; and
- to interpret and compare the results of the historical heritage management program with evidence available in relevant histories, both oral and documentary, and historic sites and complexes documented previously for Snowy 2.0 Exploratory and Main Works.

Accordingly, the archaeological research design is an extension of the program developed for Snowy 2.0. It also forms part of a broader research framework for Kosciuszko National Park and the Snowy Mountains as a whole. It will build on the results of investigations undertaken at Ravine (Lobs Hole), expanding the dataset of sites investigated.

Research Questions

The following questions have been identified to be relevant to understanding the archaeology of KNP and the Lobs Hole project area.

- How are particular themes and/or values evidenced?
- What can be inferred about the cultural and natural taphonomic processes evidenced at sites and the implications for future conservation of similar sites?
- What patterns can be identified about site types, locations, temporal context and associations with relevant historic routes?
- What patterns exist in terms of technologies, materials and/or construction methods evidenced across sites of a particular theme or period?
- How do sites of a particular period, type or function compare with similar site across NSW and Australia as a whole?
- What evidence is there of gender at sites and/or items of moveable heritage of a particular period, type or function, and what can be inferred regarding the contribution of women?

- What can be inferred regarding patterns and/or phases of pastoral occupation, and in particular transhumance?
- How are the different types and phases of mining evidenced?
- How has water management changed through time, and what evidence is there of associated environmental impacts?
- What evidence is there of regional, national and/or international commerce?

The following questions include those that were identified explicitly for Lobs Hole during the Snowy 2.0 heritage program.

- What features are present at the item/complex?
- What can be inferred regarding site formation processes?
- Are there relatively intact archaeological deposits present? If so, what are the horizontal and vertical extents of those deposits?
- What evidence is there of the function of the item/complex?
- Is there evidence of different activity areas within the item/complex?
- What evidence is there of the relationships between items/complexes?
- Are different phases of use evidenced? If so, how?
- Can the phase(s) of use be dated? – i.e. can the decade(s) of use be determined?
- What is the overall chronology of the item/complex?
- Is there evidence that links the item/complex to particular individuals or groups?
- What evidence is there of how the item/complex was constructed/modified/abandoned?
- What can be inferred regarding age, gender, ethnicity and social status? Are there demographic patterns associated with particular areas, periods or site types?
- To what extent were goods and materials produced/resourced locally? Are there patterns in what was produced/resourced locally, and is there evidence of this changing over time?
- To what extent were goods and materials sourced externally? e.g. from elsewhere in Australia or internationally. Are there patterns in what was sourced externally, and is there evidence of this changing over time?
- How does the archaeological evidence compare with the known, albeit limited historical record?
- How do the locations and layouts of items/complexes compare with official records? e.g. Crown plans, mine records, parish maps?

- How do the chronology, locations and layouts of items/complexes compare with oral histories?
- What spatial patterns are there in terms of particular site types or chronological periods? What can be inferred from these?
- How do spatial patterns in sites of a particular type or period relate to known contemporary routes?
- How do spatial patterns in sites of a particular type or period relate to known contemporary cultural and/or natural water resources?
- What similarities and differences are there between sites of the same type, period or geographic location?
- What further information can be found about the interdependent relationship between the historic occupation of Kiandra and Lobs Hole? Was Lobs Hole integral to the occupation of Kiandra during the late 1800s/early 1900s, or incidental?
- How did people live, work and play at Lobs Hole during the heyday of copper mining, and what was the nature of transition in the twentieth century to the single family farming enterprise (the Yan farm) which lasted until the 1960s.
- What was the nature of the Yan farming? Was it largely a self-sufficient enterprise or was a surplus exported and sold outside Lobs Hole?

Archival Recording

Wherever archival recording is required, either as a standalone mitigation measure, or as a component of archaeological excavations, the fieldwork will be preceded by a review of available mapping. This will include reviews of:

- mapping data;
- historical mapping (e.g. parish maps, Crown plans and other surveys); and
- previous field recordings (i.e. existing archival records undertaken for Snowy 2.0).

This review of mapping and recording will serve to ensure that the archival recording encompasses all potential features, builds on existing data and directs an appropriate level of detailed recording on those aspects of the site that are not already adequately documented. In this way the review of mapping will help direct the focus of both the archival photography and the accompanying survey and measured drawings.

Depending upon the nature of the site, its location and the nature and extent of vegetation in and around the site, it may be necessary to undertake vegetation clearance prior to some aspects of the in-field archival recording. At a minimum, broad level landscape archival photography would be undertaken prior to any such clearance. All vegetation clearance undertaken to assist with archival recording would be done by

hand (i.e. with use of hand held tools) and would be overseen by the project archaeologist.

Vegetation clearance would only be conducted at sites inside the disturbance boundary (i.e. where construction impacts are anticipated) and would be conducted in accordance with the relevant Conditions of Approval.

Archival photography will be undertaken at a landscape level, and on a site by site basis, with a digital single lens reflex (DSLR) camera in RAW image format capture. At a landscape level, the archival photography will aim to document panoramas to and from heritage items as well as the broad landscape setting of individual items and complexes. At the individual site/complex level, the photographic record will document the item in terms of general views from different perspectives, through to capturing the contexts of, and relationships between, individual site elements/features, as well as the details specific to those intra-site components. In addition to the metadata recorded by the camera for each image, a record will be kept of the subject (e.g. heritage item ID/component), date, the location from which the photograph was taken and the direction in which the camera is facing. Where relevant, this will be cross referenced to site plans or other mapping. Typically, a minimum of two photographs at slightly different exposures will be captured for each image, so as to reduce the risk of a particular component of the archival recording being inadequately documented due to poor image quality, or other recording defects.

In addition to the RAW image format archival photography, a series of overlapping still images and/or video footage will be captured with a handheld camera or pole mounted camera for the purposes of photogrammetry. Photogrammetry will be undertaken in instances where rapid 3D data collection will assist in recording large/complex features and/or where it will assist in providing imagery for later analysis or interpretation of the site.

Wherever possible (i.e. where vegetation and topography allow), site layout, components, contexts and topography will be recorded in three dimensions.

Given the comprehensive mapping conducted previously for Snowy 2.0, basic methods of tape and compass recording will be used to survey in site elements/complexes. Tape and compass survey methods will be required where vegetation cannot be removed, and hybrid or improvised survey techniques are required to capture all of the necessary data to document a site/feature.

A minimum of one in-field site plan will be drawn up during archival recording. Site plans will be drawn up “to scale” at a scale appropriate to the size and complexity of the site. Site plans will be produced to: assist in surveying and documenting features; as a means of contextualising the location of, or relationship between, site components and

phases; and document cross referencing details between different components of the archival record.

Typically, site plans will be drawn on A3 paper/film or larger at a scale of 1:10, 1:20 or 1:50. Site plans at scales of 1:100 or 1:200 will typically be supplemented by additional plans at a higher level of detail. All site plans will include cross referencing to relevant TBMs, baselines and survey stations. Additional details such as feature/deposit descriptions, interpretive notes, photo locations, and other data may be recorded either directly onto the site plan, or onto a transparency overlay. All plans and overlays will be labelled, numbered and include relevant dates of survey and the personnel involved.

Archaeological Test Excavation/Salvage Excavation Methodology

Where test and or salvage excavation is required, the following methods will be implemented:

- temporary benchmarks will be established across the site in order to facilitate the recording of features and bagging/labelling of finds relative to the GDA94 Zone 55 grid.
- pins/posts will be surveyed in at 5 - 10m intervals across the site to provide baseline reference points for recording. Additional pins/posts will be added as required at 1m intervals across areas of interest where hand excavation is conducted.
- vegetation clearance and archival recording will be conducted prior to the commencement of excavation.
- the site will be stripped of surface vegetation and topsoil (i.e. grass and associated rootzone) by hand excavation (e.g. hoe, spade and trowel).
- investigation of the site will continue by sectioning and/or sondages (by hand) to ascertain site stratigraphy/formation/integrity and individual contexts. If required, salvage excavations will continue stratigraphically.
- records including context logs, context recording forms, Harris matrices, section drawings, site plans, finds logs, photography logs and site diaries will be maintained across all excavation areas.
- a sample of all hand excavated spoil (e.g. 10 buckets or 10% of the spoil) will be sieved through a maximum mesh size of 5mm. Where the sieved sample, or other onsite conditions warrant (e.g. fill deposits with high integrity and/or numerous small diagnostic finds) the entirety of the spoil from that context will be sieved. In such instances, a sample of the spoil will be sieved through a minimum 2mm mesh in order to ascertain which sieve size should be applied to the deposit.
- finds will be logged and bagged by context including details of their location within the GDA94 Zone 55 grid.

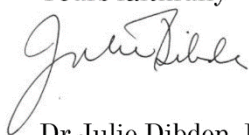
- excavation within a given feature/item/complex will cease when a culturally sterile layer has been reached, and sufficient information has been recovered to characterise the nature, extent and phasing of site use, and all relevant lines of investigation relating to applicable research questions have been pursued.
- post-excavation analysis, research and reporting commensurate with the significance of the sites and the results of the archaeological investigations.

Personnel

Dr Julie Dibden, NSW Archaeology Pty Ltd would manage and conduct the project including the field work. Julie has 27 years experience in consulting archaeology. She has an honours degree (1st class) in archaeology and is a PhD of the Australian National University.

The historical excavation program would be managed by Mr Ben Churcher or Dr Jodie Benton, both of whom fulfil the Heritage Council's Excavation Director Criteria for the excavation of locally significant archaeological sites. Their criteria for excavation director status are attached below. Mr Churcher and Dr Benton have worked previously with NSW Archaeology Pty Ltd on Snowy 2.0 heritage mitigation.

Yours faithfully



Dr Julie Dibden, Director
New South Wales Archaeology Pty Limited