



PERDAMAN
INDUSTRIES

CHEMICALS & FERTILISERS

Aboriginal Heritage Management Plan

Perdaman Urea Project
Burrup Peninsula, Western Australia
CW1055600



Prepared for Proponent:
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Foreword

This Aboriginal Heritage Management Plan (FMP) is a sub-plan of the overarching Project Environmental Management Plan (PEMP) for the Perdaman Urea Project. An overview of the structure of the PEMP and sub-plans is illustrated in Figure 0-1.

This plan shall be reviewed and updated as necessary throughout the construction, operation and decommissioning phases of the project. The review process is detailed in *Section 15 Review and Continual Improvement* of the PEMP.

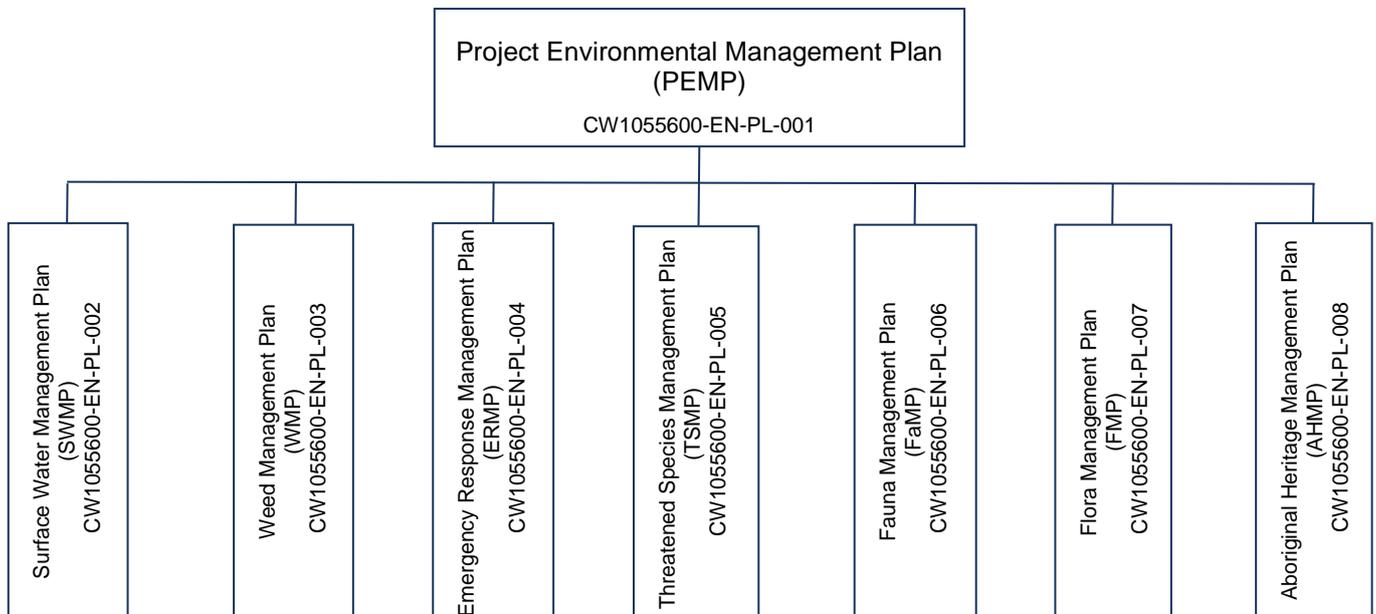


Figure 0-1: Structure of the Project Environmental Management Plan and supporting sub-plans.

1 Introduction

Perdaman Chemicals and Fertilisers Pty Ltd (Perdaman) proposes to develop a urea production plant in the Burrup Strategic Industrial Area (BSIA), approximately 10km from Dampier and 20km north-west of Karratha on the north-west coastline of Western Australia. Refer to Figure 1, Appendix C. The BSIA is subject to the Burrup and Maitland Industrial Estate Agreement (BMIEA) which establishes agreed processes and protocols in relation to how industrial development should meet statutory requirements in relation to heritage aspects of any proposed development in the BSIA. The project will transport urea product, via conveyor, for shipment from the nearby Dampier Port. The proposed location is within the Development Envelope (DE) as defined in the Draft Environmental Review Document (ERD).

Development which may require clearing for the urea plant construction and laydown within the DE, will occur in the following areas:

- > Sites C and F of the BSIA;
- > a 30m wide easement between Sites C and F to accommodate an elevated service corridor for road and infrastructure requirements;
- > the previously disturbed/cleared east-west common-user infrastructure corridor connecting to the Port;
- > an interconnection between site C and the common user infrastructure corridor;
- > within previously cleared/disturbed Pilbara Port;and
- > along the northern boundary of Site F where the existing public access road to Hearson's Cove would be realigned into the statutory defined road reserve.

Perdaman is aware of its responsibilities to manage the integrity of the local environment and to observe regional heritage sensitivities.

In harmony with the MRAS and in-line with the Burra Charter (which largely underpins the MRAS), Perdaman recognises and values the richness of Aboriginal culture in the Murujuga, where Indigenous communities have lived for thousands of years.

Accordingly, Perdaman, in conjunction with inputs from local and relevant Aboriginal Stakeholder groups, expert consultants and government agencies, has developed this Aboriginal Heritage Management Plan (AHMP) to help avoid and/or minimise any impact on Aboriginal Heritage Sites within the Project Area and on the National Heritage Values of the adjacent area.

As part of the impact assessment process, an Aboriginal heritage review and Aboriginal cultural heritage survey of the UPDE was undertaken to identify Aboriginal Heritage Site locations for the purposes of the Proposal. Refer to Appendix C for extent of 2019 heritage survey. This work was conducted pursuant to the requirements contained in the BMIEA utilising Murujuga Aboriginal Corporation (MAC) which is authorised to represent the Ngarluma, Yindjibarndi, Yaburara, Mardudhunera and Wong-Goo-Tt-Oo people as the Traditional Custodians of this area and as signatories to the BMIEA.

Perdaman has concluded an Agreement with MAC in relation to the Perdaman Urea Project (PUP) which covers a range of aspects of the development, including agreed management of heritage aspects.

Perdaman's goal is to construct and operate the urea production plant in a manner that will minimise the industrial footprint and the impact on National Heritage Values. During construction, indigenous monitors will be involved to ensure that Aboriginal heritage values within the site are protected and preserved or where disturbance is authorised, managed in accordance with such authorisations. All work in sensitive areas will be carried out strictly in accordance with any conditions imposed by the State Minister for Indigenous Affairs and the Federal Minister for Sustainability, Environment, Water, Population and Communities.

1.1 Purpose

The purpose of this AHMP plan is to provide a framework which describes how the project will address, manage, monitor and mitigate impacts on Aboriginal Heritage Sites.

In particular, the AHMP will help:

- To the extent practicable, avoid or minimise any impact on Aboriginal Heritage archaeological and ethnographic sites and where disturbance is practicably unavoidable, minimise the impacts on archaeological and ethnographic sites; and
- Comply with the recommendations of heritage survey reports that detail the proposed disturbance areas.

1.2 Scope

This AHMP applies to:

- All activities associated with the construction, commissioning, operation and decommissioning of Perdaman's urea production plant; and
- All Perdaman employees, contractors and visitors.

1.3 Target Audience

All Perdaman employees and contractors working on the construction and operation of the urea production plant and the Aboriginal Stakeholder groups whose heritage this AHMP is designed to protect.

1.4 Objectives

The following points constitute the objectives of this AHMP and must be met.

- Contain all ground disturbing and construction activities to within areas covered by current surveys or in the previously disturbed/cleared infrastructure zone; and
- Initiate surveys and consult where activities are proposed within the DE but not covered by current surveys.

2 Project Overview

Perdaman plans to construct and operate a state-of-the-art urea plant with a production capacity of approximately 2 million tonnes per annum (Mtpa) on the Burrup Peninsula in the North West of Australia (Figure 2-1) (the Project).

The Project infrastructure including the main production facility (urea plant), administration, maintenance and storage infrastructure, conveyor and port storage and shiploading facilities are situated within the Burrup Strategic Industrial Area (Burrup SIA). The estate's close proximity to gas, port and other key infrastructure makes it an ideal location for the Project.

The Burrup SIA is located in close proximity to the Murujuga National Park which covers an area of 4,913ha on the Burrup Peninsula. The area is considered to host the largest concentration of ancient rock art in the world. As such, the Project will apply effective management strategies that minimise or abate, actual or potential impacts on the environment, heritage and cultural values of the region.

The Project involves piping natural gas from the nearby Woodside operated LNG facility to the project site under a long term commercial off-take agreement. Natural gas is converted to urea and the final granulated product is transported by conveyor to the Dampier Port by closed conveyor along the East West Service route, where new facilities will include an enclosed stockpile shed and ship loading facilities.

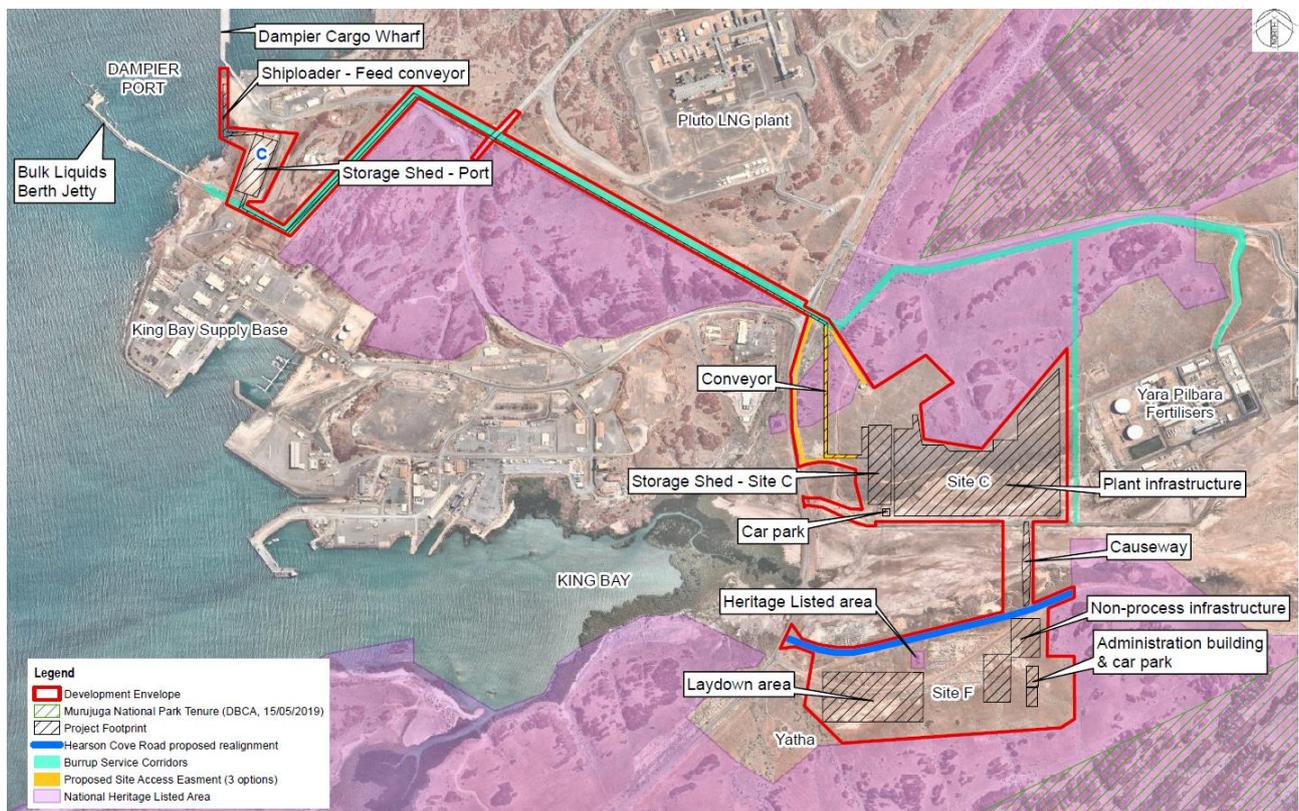


Figure 2-1 Project site layout and adjoining facilities.

Proven Urea production technology underpins each of the key stages of this project. The technologies being applied to the plant are equivalent to the industry best for the specific applications and successfully operate elsewhere in the world. The processing plant can be broadly considered in four sections, or Blocks, namely:

- Gas Block
- Product Block
- Utility Block
- Infrastructure and Logistics

Each of the Process Blocks is made up of a number of process units or physical sections of the plant. The major process sections are described in Figure 2-2.

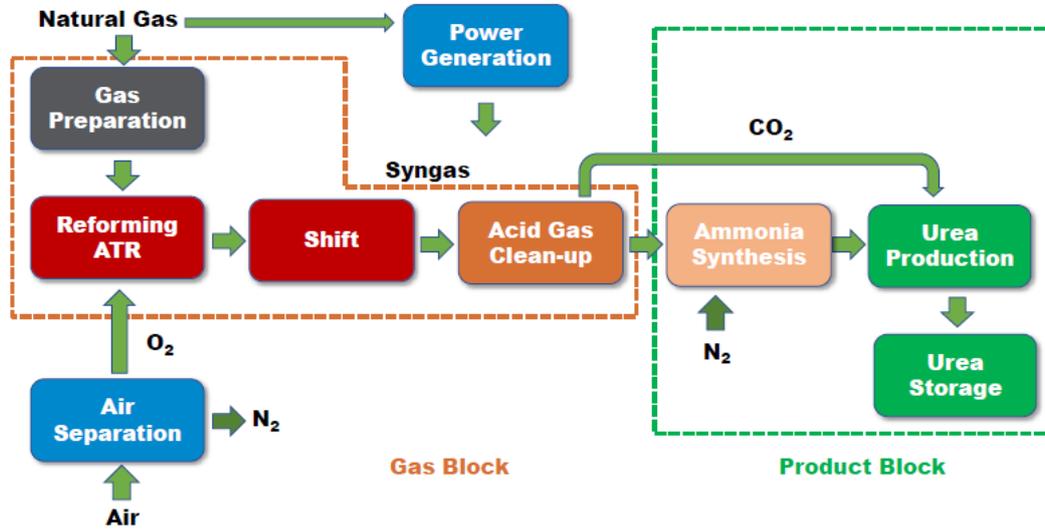


Figure 2-2 Figure 2-1: Process Block Diagram

3 Legislative Context

3.1 Defining Aboriginal Heritage Sites

Heritage places and objects may be protected under either or both State and Federal legislation. In Western Australia the *Aboriginal Heritage Act (1972)* (AHA) is the legislation for the protection of Indigenous heritage places and objects with the Department of Planning, Lands and Heritage (DPLH) responsible for administering the AHA. Consents, with or without conditions, are the responsibility of the State Minister for Indigenous Affairs.

Part IV of the AHA makes provisions for the protection of heritage objects and Part VI of the AHA makes provisions for the protection of Heritage Sites. For the purpose of these guidelines a Heritage Site is a place which either meets or has the potential to meet the requirements of Section 5 of the AHA.

Section 5 of the AHA defines an Aboriginal Heritage Site as;

- (a) any place of importance and significance where persons of Aboriginal descent have, or appear to have, left any object, natural or artificial, used for, or made or adapted for use for, any purpose connected with the traditional cultural life of the Aboriginal people, past or present;
- (b) any sacred, ritual or ceremonial site, which is of importance and special significance to persons of Aboriginal descent;
- (c) any place which, in the opinion of the Committee¹, is or was associated with the Aboriginal people and which is of historical, anthropological, archaeological or ethnographical interest and should be preserved because of its importance and significance to the cultural heritage of the State;
- (d) any place where objects to which this Act applies are traditionally stored, or to which, under the provisions of this Act, such objects have been taken or removed; and

In addition to section 5 of the AHA the ACMC must evaluate the Heritage places and objects criteria under section 39 of the AHA.

The role of the ACMC is to:

- evaluate on behalf of the community the importance of places and objects alleged to be associated with Aboriginal persons;
- where appropriate, to record and preserve the traditional Aboriginal lore related to such places and objects;
- recommend to the Minister for Aboriginal Affairs (Minister) places and objects which, in the opinion of the Committee, are, or have been, of special significance to persons of Aboriginal descent and should be preserved, acquired and managed by the Minister;
- advise the Minister on any question referred to the Committee, and generally on any matter related to the objects and purposes of this Act;
- perform the functions allocated to the Committee by this Act; and
- advise the Minister when requested to do so as to the apportionment and application of moneys available for the administration of this Act.

Associated sacred beliefs, and ritual or ceremonial usage, in so far as such matters can be ascertained, shall be regarded as the primary considerations to be taken into account in the evaluation of any place or object for the purposes of this Act.

When evaluating heritage places the Committee is required to consider section 39 of the AHA particularly section 39(2).

3.2 Evaluating the Importance of Places

In evaluating the importance of places and objects the Committee shall have regard to —

- (a) any existing use or significance attributed under relevant Aboriginal custom;
- (b) any former or reputed use or significance which may be attributed upon the basis of tradition, historical association, or Aboriginal sentiment;
- (c) any potential anthropological, archaeological or ethnographical interest; and

(d) aesthetic values.

If sites cannot be practically avoided by development, then Section 18 of the AHA makes provisions for consents to be granted to impact such sites for specific purposes.

This AHMP has been prepared in order to comply with typical Aboriginal Heritage government approval conditions and has been drafted with reference to the following legislation:

- > Aboriginal Heritage Act 1972 (WA);
- > Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth); and
- > Environment Protection and Biodiversity Conservation Act 1999 (Cth).

This AHMP may be revised to reflect final conditions of future project approvals pursuant to these statutes.

4 Background

In 2007 the Australian Government placed areas adjacent to the Project Area on the National Heritage List thus recognising the national significance of the cultural heritage values present in this region.

Previously, Native Title was determined by the Federal Court of Australia not to exist over the Burrup Peninsula (refer to the Ngarluma-Yindjibarndi Determination - Federal Court Number WAD6017/1996). However, prior to this determination the State executed the Burrup Maitland Industrial Estates Agreement (BMIEA) with the Ngarluma-Yindjibarndi, Wong-Goo-Tt-Oo, Yaburara and Mardudhunera people, which agreed the developable industrial sites and locations that would be subject to payments by eventual proponents developing those sites. Under the BMIEA, the Native Title applicant parties consented to the compulsory acquisition and extinguishment of Native Title in the BSIA in return for, among other things, the grant of freehold interests in non-industrial land on the Burrup Peninsula to relevant approved body corporate (which in this case is the MAC). The acquisition of Native Title rights and interests over the Burrup Strategic Industrial Area (BSIA) land took place under the future act provisions of the *Native Title Act 1993* (Cth).

The Project Area falls within the BSIA precinct set aside by the WA government for industrial development which is balanced against the broader national heritage and environmental values of the region. Specifically, the urea production plant is located on Sites C and F within the BSIA with infrastructure connection between these sites as well as between site C and the Pilbara Port, where produced urea will be loaded to ships for delivery to customers.

The Western Australian Government has developed the Murujuga Rock Art Strategy (MRAS) which outlines a long-term framework to guide the protection of the Aboriginal rock art (petroglyphs) located on Murujuga (the Dampier Archipelago and Burrup Peninsula). Its primary goal is to deliver a scientifically rigorous approach to monitoring, analysis and management that will provide an appropriate level of protection to the rock art. The strategy provides a framework to protect Aboriginal rock art from the airborne emissions created by Industrial development, in this same location.

The MRAS is a monitoring, analysis and decision-making framework devised by the WA State Government which has been designed to project Aboriginal rock art heritage aspects on Murujuga.

Perdaman recognises and values the richness of Aboriginal culture in Murujuga, where indigenous communities have lived for thousands of years. These National Heritage Values include an exceptionally diverse array of rock engravings (petroglyphs) comprising images of avian, marine and terrestrial fauna, schematised human figures, figures with mixed human and animal characteristics and geometric designs. The Murujuga area also contains standing stones, stone pits and other archaeological evidence of human occupation.

The implementation of the AHMP is aimed at supporting the National Heritage Values of the region.

Perdaman recognise the cultural values of Murujuga to Aboriginal people from this region. Perdaman is committed to minimising the industrial footprint of the project by following a sustainable development framework. Perdaman is also a committed to ongoing consultation with the relevant Aboriginal Stakeholder groups and community members.

5 Current Situation

Perdaman has prepared an overarching position for heritage interaction and management, including rock art and Murujuga (Project Destiny Heritage Charter) **Error! Reference source not found..** MAC has endorsed this position in principle, pending final EP Act Part IV Ministerial Approval, of the Charter.

A large number of archaeological and ethnographic heritage surveys have been undertaken within the project area in the past. A recent heritage survey coordinated by Department of Jobs, Tourism, Science and Innovation (JTSI) was conducted in late 2019 within the Project Development Envelope. The number and location of these Aboriginal Heritage Sites has been confirmed during the course of these surveys. The following Aboriginal Heritage Sites, as recorded on the DPLH AHIS, are located within the UPDE.

Table 5-1 Recorded Aboriginal Heritage Sites within the UPDE.

AHIS Site ID	Site Type	Action
9296	Men's Restricted Artefacts/Scatter, Engraving	Site to be identified and avoided
9439	Man Made Structure/Engraving	Site to be fenced and avoided
9597	Artefacts/Scatter, Engraving, Grinding Patches/Grooves, Midden/Scatter,	Site to be identified and avoided
9599/16775 (Duplicate)	Engraving, Grinding patches/grooves	Site to be identified and avoided
9610	Midden/Artefact Scatter	Site to be identified and avoided
9755	Engraving	Site to be identified and avoided
9808	Engraving	Site to be identified and avoided
9809	Engraving	Site to be identified and avoided
10558	Men's Restricted Engraving	Site to be identified and avoided
16636	Midden/Artefact Assemblage	Site to be identified and avoided
18615	Men's Restricted Engraving	Initiate processes to allow salvage
19239	Grinding Patches/Grooves	Initiate processes to allow salvage
19766	Engraving	Site to be identified and avoided
19618/19787 (Duplicate)	Men's Restricted Engraving, Grinding patches/grooves, Natural Feature	Site to be identified and avoided
19788	Men's Restricted Artefacts/Scatter, Engraving	Site to be identified and avoided
19874/20036	(Duplicate) Engraving	Initiate processes to allow salvage

AHIS Site ID	Site Type	Action
19876	Engraving/Grinding Patches/Grooves	Site to be identified and avoided
19885	Engraving, Grinding Patch	Site to be identified and avoided
20035	Engraving	Site to be identified and avoided
20037	Engraving	Initiate processes to allow salvage
20038	Engraving	Site to be identified and avoided
20039	(Men's Restricted) Engraving	Site to be identified and avoided
20040	(Men's Restricted) Engraving	Site to be identified and avoided
26008	Engraving	Site to be identified and avoided
MAC Site 001	Midden/Artefact Assemblage	Site to be identified and avoided
MAC Site 002	Engraving	Site to be identified and avoided
MAC Site 003	(Men's Restricted) Engraving	Site to be identified and avoided
MAC Site 004	Engraving	Site to be identified and avoided
MAC Site 005	Engraving	Site to be identified and avoided
MAC Site 006	(Men's Restricted) Engraving	Site to be identified and avoided
MAC Site 007	(Men's Restricted) Engraving	Site to be identified and avoided
MAC Site 008	(Men's Restricted) Engraving	Site to be identified and avoided

The following Aboriginal Heritage Sites, as recorded on the DPLH AHIS, are located adjacent to the UPDE Recommendations concerning them were made in the heritage survey reports. All recommendations related to revising the Register of Places and Objects to reflect that the Sites do not intersect with the Project Area.

Table 5-2 Recorded Aboriginal Heritage Site adjacent to the UPDE

DPLH Site ID	Site Type
358	Artefacts/Scatter/Midden
9612	Artefact/Scatter, Midden/Scatter
11936	Engraving, Midden/Scatter
19762	Man Made Structure
19786	Engraving
19888	Engraving
20028	Grinding patches, artefacts and shell

6 Mitigation Measures

6.1 Management Actions

The actions required to meet the objectives are listed below. The following management hierarchy outlines the Perdaman positions that will be accountable for the implementation of these objectives.

Table 6-1 Required Actions

Theme	Actions	Responsible Party	Accountable Party	Key Performance Indicators
AHMP	Prior to commencement of works, update this AHMP to properly protect and report all places and Objects on the Land to which the AHA applies. Once approved by the Registrar, the updated AHMP is to be implemented.	Environment and Heritage Manager	Project Director	AHMP submitted to the Register and approved prior to construction commencing.
Engagement	Establish a liaison committee between MAC and Perdaman for regular meetings, to establish and maintain processes and accountability between the separate parties, and as a reference group for any cultural or development issues that may arise during the project development and ongoing operations.	Environment and Heritage Manager	Project Director	Minutes from regular committee meetings (Note: these may include confidential material that will not be made publicly available for cultural or commercial reasons).
Engagement	Engage MAC to provide cultural awareness training on an ongoing basis for all Perdaman employees and contractors, to accompany site inductions for all managers and workers Where inductions are to be delivered online, engage with MAC to develop an online delivery module, and agree the commercial arrangements for use of this module.	Environment and Heritage Manager	Project Director	Completion of cultural awareness induction by all employees and contractors.

Theme	Actions	Responsible Party	Accountable Party	Key Performance Indicators
Risk Assessment	During detailed design and construction planning, undertake further assessment of risks to refine the ERD level of risk understanding and ensure that risks are managed during the design process and construction planning to levels that are as low as reasonable practical (ALARP).	Project Manager	Project Director	Risk register demonstrating management to ALARP.
Salvage	Obtain necessary consents pursuant to the AHA to undertake unavoidable salvage.	Environment and Heritage Manager	Project Director	Prepare statutory applications to inform and support applications pursuant to s18 and/or s16 of the AHA.
Salvage	Engage Aboriginal Heritage Monitors through MAC from the Aboriginal stakeholder groups to undertake the monitoring of all initial ground disturbing works and salvage of heritage material. The salvage works are undertaken under the guidance of senior traditional owner monitors and a qualified and experienced archaeologist.	Environment and Heritage Manager	Construction Manager	Engagement Aboriginal Heritage Monitors for salvaging activities associated with initial ground disturbing works. Report on salvage and relocation to be provided to Registrar. Perdaman will provide Aboriginal Stakeholder groups with an opportunity to perform a ceremony prior to the commencement of salvage and relocation.
Salvage	Detailed salvage assessment to be undertaken to produce a plan for each physical component of Sites which require salvage.	Environment and Heritage Manager	Project Director	Salvage assessment undertaken in conjunction with senior traditional owner monitors (male for restricted men's sites), and a qualified and experienced archaeologist.

Theme	Actions	Responsible Party	Accountable Party	Key Performance Indicators
Salvage	Procedures to deal with objects within the meaning of section 6 of the AHA ("Objects") that will be affected by works associated with the Purpose.	Environment and Heritage Manager	Project Director	All salvaged objects are relocated prior to the commencement of construction, in consultation with Aboriginal Stakeholder groups.
Salvage	Salvage report is submitted to the Registrar.	Environment and Heritage Manager	Project Director	Salvage Report submitted.
Access	Ensure all Men's Restricted sites are accessible only through written permission via the senior male MAC traditional owner representatives sitting on the Circle of Elders.	Environment and Heritage Manager	Project Director	Access register to be maintained including written approvals.
Air quality monitoring	Contribute to the development of an Environmental Quality Management Framework as detailed in the MRAS.	Environment and Heritage Manager	Project Director	Compliance with Air Quality Management Plan.
Air quality monitoring	In harmony with the objectives of the Murujuga Rock Art Strategy (MRAS), undertake ongoing assessment of airborne pollutants to monitor their impact on the petroglyphs located on Murujuga and report on these results.	Environment and Heritage Manager	Project Director	Compliance with Air Quality Management Plan.
Ground Disturbing Activities	Before undertaking any work that involves ground disturbance, a Ground Disturbance Permit (GDP) will be obtained.	Environment and Heritage Manager	Construction Manager	Compliance with Environmental Management Plan.

Theme	Actions	Responsible Party	Accountable Party	Key Performance Indicators
	The request for an GDP will include assessment of the potential for the works to impact on aboriginal heritage aspects, including the potential unearthing of buried archaeological sites, objects or burials, and to shift surface isolated artefacts from probable impact by the works. It will also include actions to consider additional monitoring by a qualified and experience archaeologist, for the moderate and high-risk areas and all areas within proximity of extant Aboriginal cultural heritage sites.			
Incident Reporting	Project development activities that impact on National Heritage Values of the National Heritage Place, to be reported to DEE in writing within 72 hours. These may include (but not limited to) impacts caused by: Blasting activity; construction and operations and spillage of potentially corrosive materials.	Environment and Heritage Manager	Project Director	
Amendment of Plans	<p>Submission to DoEE and DWER for written Ministerial approval of all revisions made to management plan and monitoring program.</p> <p>Ensure commencement of any revised activities do not take place until receipt of the Federal Minister's written approval of revised activities.</p> <p>Replacement of original management plan and monitoring program with the relevant revised plan(s) that have been approved by the Federal Minister.</p>	Environment and Heritage Manager	Project Director	All amendments to management or monitoring plans are submitted to DoEE for approval prior to taking effect.
Publication of Management Plans	Publication of management plan(s) and or monitoring program/s on the Perdaman website within 1 month of being approved unless otherwise agreed in writing by the Federal Minister.	Environment and Heritage Manager	Project Director	Plans published on Perdaman website within 1 month of approval.

Theme	Actions	Responsible Party	Accountable Party	Key Performance Indicators
Fencing	Install chain mesh of at least 2.5m in around the perimeter of the Project Area prior to construction.	EPC contractor	Construction Manager	Chain mesh fence of at least 2.5m in height installed around the perimeter of the Project Area before construction commenced.
Signage	Signs are installed. These will be at least 1m ² in size and attached to fencing at the entrance to the Project Area at no less than 50m intervals along the fence. The signs will state that no construction and operation staff are permitted to enter areas surrounding the Project Area that contain manmade structures of a type mentioned in the National Heritage Place Gazette notice and/or engravings and/or standing stones and/or archaeological material associated with any of the aforementioned items. If their work specifically requires them to do so, they must obtain a GDP for the proposed work.	EPC contractor	Construction Manager	Signage of at least 1m ² size is installed at maximum 50m intervals prior to construction commencing.
Human Remains	Immediately cease carrying out the Purpose if human skeletal remains ("Remains") are found and report the matter to the Western Australian Police and the Registrar. Advice from the Western Australian Police and Registrar will then be followed regarding management of the issue	EPC contractor	Construction Manager	The WA Police will be informed of any discovery of human remains. If the Police suspect the remains to be of Aboriginal origin, the Registrar and MAC will also then be informed.

6.2 Ground Disturbance Permit (GDP)

A Ground Disturbance Permit (GDP) is a permit issued by Perdaman for enabling works within defined battery limits, which have the potential to impact native vegetation, fauna, heritage or other environmentally sensitive values.

The GDP provides the Project personnel responsible for managing the ground disturbing activities with a summary of the key approval commitments and obligations obtained by or issued to Perdaman by regulators, tenure holders and other third parties.

Activities covered in the GDP include but are not limited to clearing and grubbing, grading open ground, movement of plant, equipment and vehicles and any other activity which will disturb or damage soil, waterways, habitat and, or vegetation.

A GDP could be issued through a standalone process or included in an overall approval to work procedure developed for the Project.

It is the responsibility of all project Personnel to ensure they submit to Perdaman an application form requesting a GDP at least two weeks prior to requiring access to the area being the subject of the GDP.

6.3 Procedures

The Procedures to ensure that Perdaman employees and contractors comply with this AHMP are set out in Attachment A.

6.4 Ground disturbing works

All construction works will be undertaken within areas that have been heritage surveyed.

To achieve this the following heritage management process must be followed:

- Undertake all construction work within areas that have been subject to current heritage surveys in accordance with the provisions of the BMIEA.
- If work activities involve the disturbance of ground for the first time, or what appears to be the first time, a GDP will be obtained.
- Obtain a GDP if access is required to areas outside current surveyed areas.
- Stop work immediately and notify your supervisor if you are not working under a Ground Disturbance Permit and find what you think is an Aboriginal Heritage Site or human skeletal remains. All three Aboriginal stakeholder groups are to be contacted in the event of sub-surface cultural material, including skeletal, being uncovered.

7 Accountability and Responsibility

Parties responsible and accountable for the objectives and actions are listed in Table 6-1 above.

8 Assurance

The Environment and Heritage Manager will conduct annual reviews of compliance with this AHMP and the outcome of these reviews will be reported to the Senior Manager HSE&Q.

9 Incident Reporting

All breaches of the AHMP, specifically Aboriginal Heritage Site disturbance and or disturbance outside the Disturbance Area will be documented by the Environment and Heritage Manager. Accordingly, all incidents must be reported to the Environment and Heritage Manager immediately.

If Perdaman employees, contractors or visitors damage, trespass or otherwise interfere with an Aboriginal Heritage Site identified for protection then the following shall occur:

- a. Work is immediately stopped in the vicinity of the area of the suspected breach and the area is to be cordoned off with a 5m surrounding buffer;
- b. The Environment and Heritage Manager will report the incident immediately to the Site Manager and the Senior Manager HSE&Q;
- c. An Incident Report Form which identifies the activity taking place, who was present and how the incident occurred is to be completed within 24 hours of the incident. The completed Incident Report Form must be submitted to the Senior Manager HSE&Q; and
- d. The Environment and Heritage Manager will ensure that the necessary notifications, investigations and take any action deemed necessary take place. MAC will be offered the opportunity to co-ordinate viewing Heritage Sites and providing input into subsequent management processes.

10 Review

The Environment and Heritage Manager will conduct a review of the AHMP 12 months after the commencement of construction. Personnel involved with implementing this AHMP should send feedback to the Environment and Heritage Manager. Subsequently, this AHMP will be reviewed every two years, or whenever appropriate.

If there are any questions in relation to the legislation, heritage reports, agreements, procedures and protocols referred to in this document, they should be directed to Perdaman's Environment and Heritage Manager in the first instance.

11 Deviations from this Plan

There shall be no deviation from this AHMP without written consent from the Senior Manager HSE&Q. Consent will not be granted until there is a plan in place to achieve conformance within a reasonable time frame and unless alternative actions are in place for the duration of the deviation.

12 Definitions

Aboriginal Heritage Site

A site identified as an archaeological or ethnographic site under the Aboriginal Heritage Act 1972 (WA).

Aboriginal Stakeholders

The identified Aboriginal groups with cultural interests in the area including MAC, NAC and NYFL

Aboriginal Heritage Act 1972 (WA)

The relevant Act for the purpose of dealing with Aboriginal heritage matters.

Development Envelope

The Project Development Envelope shown in Figure 2-1 of the ERD

Disturbance Area

The area within the Development Envelope (DE) covered by the urea production plant that will be cleared for plant construction and laydown areas

Environment and Heritage Manager

Person employed by Perdaman to manage environment and heritage issues. In regard to heritage, this includes overseeing heritage work on site, monitor compliance with this AHMP and to record activities associated with Aboriginal heritage.

Ground Disturbance Permit

A Ground Disturbance Permit (GDP) is a permit issued to a Subcontractor, by the Contractor, enabling Works within defined battery limits to manage any impacts on native vegetation, heritage or other environmentally sensitive values. It includes the key approval commitments and obligations obtained by or issued to the Contractor or Owner by regulators, tenure holders and other third parties.

Infrastructure zone

East West Service Corridor is the common-user corridor disturbed / cleared by WA government and the Project footprint in Dampier Port

National Heritage Values

As defined by section 324D of the Environment Protection and Biodiversity Conservation Act 1999 - Section 528 (Cth)

National Heritage Place

The Dampier Archipelago (including Burrup Peninsula) National Heritage Place, particularly the rock art sites.

Registrar

Registrar of Aboriginal Heritage Sites, Western Australia Department of Planning, Lands and Heritage.

Site Disturbance

Ground activity that may result in the disturbance of any Aboriginal Heritage Site.

Urea Plant Development Envelope (UPDE)

Comprises all seven Project Areas shown with coloured shading on the General Locality Map in Appendix C of the AHMP.

13 Abbreviations

Abbreviation	Description
ACMC	Aboriginal Cultural Materials Committee.
AHA	Aboriginal Heritage Act 1972 (WA), or such other law passed in substitution thereof for the purpose of dealing with Aboriginal heritage matters.
AHMP	Aboriginal Heritage Management Plan.
BMIEA	Burrup & Maitland Industrial Estates Agreements
BSIA	Burrup Strategic Industrial Area
DE	Development Envelope
DEE	The Federal Department of Environment and Energy.
DPLH	Department of Planning, Lands and Heritage
DPLH AHIS	Department of Planning, Lands and Heritage Aboriginal Heritage Information System.
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999.
EPC	Engineering Procurement Construction
ERD	Perdaman Urea Project, Environmental Review Document. Assessment No.2184(WA) – 2018/8383 (Commonwealth)
GDP	Ground Disturbance Permit
MAC	Murujuga Aboriginal Corporation
NAC	Ngarluma Aboriginal Corporation
NYFL	Ngarluma and Yindjibarndi Foundation Limited
OEMP	Operational Environmental Management Plan.
PUP	Perdaman Urea Project
UPDE	Urea Plant Development Envelope (UPDE): Comprises all seven Project Areas shown with coloured shading on the General Locality Map in Appendix C of the AHMP.

14 Reference Documents

Document Number	Document Title

15 Codes and Standards

Document Number	Document Title

Attachment A. Aboriginal Management Plan Procedures

Perdaman Urea project - Aboriginal Management Plan Procedures

Purpose

The purpose of this document is to describe the procedures that must be applied during the construction and operation of the urea production plant.

Scope

These procedures apply to all Perdaman employees and contractors working on the urea production plant.

Target Audience

All Perdaman employees and contractors working on the urea production plant.

Cultural Awareness

All Perdaman employees and contractors working within the Project Area will complete cultural awareness and heritage protection training as part of their site induction. This training will include information about the National Heritage Values of the area adjacent to the Project Area, the AHMP and the AHMP Procedures.

Ground Disturbance Permit

No ground disturbing activity is to be conducted within the Project Area unless a Ground Disturbance Permit has been obtained for that activity. Heritage Approval Permits can only be issued by the Environment and Heritage Manager.

The Environment and Heritage Manager will be responsible for Ground Disturbance procedures and maintaining a record of all Ground Disturbance Permits that are issued

Procedures if Skeletal Remains are Discovered

There is the possibility that skeletal remains may be uncovered during excavation and construction activity. The discovery of human remains brings into play the following legislation:

- *Coroners Act 1996 (WA)* – all human remains
- *Aboriginal Heritage Act 1972 (WA)* – Aboriginal burials, and
- *Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)* – Aboriginal burials.

Should human remains be found during construction:

- a. Work is immediately stopped in the area of the suspected object and the area is to be cordoned off to a distance of 5 metres around the object. The Environment and Heritage Manager is to be immediately notified.
- b. The Environment and Heritage Manager is to notify the relevant person(s) as set out below:
 - i. Under Section 17 of the Coroners Act 1996 the local Police / Coroner's office must be notified.
 - ii. Only if human remains are suspected by the Police/Coroner's office to be Aboriginal, the Registrar as well as the Federal Minister for Aboriginal Affairs needs to be informed.
- c. Only if human remains are suspected by the Police/Coroner's office to be Aboriginal, at the same time as other individuals and agencies are contacted, Perdaman will notify the MAC of the discovery. MAC is to be consulted as to the management of the material once Aboriginal origin has been determined. Appropriate arrangements are to be made for nominated Aboriginal people to attend the site, if not already present.
- d. A suitable keeping place or re-interment location should be agreed between Perdaman, MAC and the DIA.

The remains must remain in situ and undisturbed until the Registrar or WA Police makes a decision about how to proceed in respect of the remains. Perdaman will, at its expense, manage the remains in accordance with the Registrar's decision and notify the whereabouts of the remains to the Registrar.

Procedures if Possible New Heritage Site is Located

There is the possibility that unknown archaeological material may be discovered during excavation and construction activity. If it is suspected that new archaeological material has been discovered, the following procedure must be adopted:

- a. Work is immediately stopped in the area of the suspected object and the area is to be cordoned off to a distance of 5m around the suspected object. The Environment and Heritage Manager is to be immediately notified.
- b. Perdaman will consult with MAC and engage the services of an archaeologist to assess the archaeological material and provide a report for Perdaman.
- c. Perdaman will form a view of what course of action is to be followed. The Environment and Heritage Manager (or delegated representative) will advise Perdaman staff and contractors when the above process has been completed and if work can continue on the area.

Consultation with Aboriginal Stakeholders

In line with BMIEA provisions, Perdaman is committed to ongoing consultation with MAC with respect to heritage matters regarding the company's construction and future operation of the urea production plant.

Perdaman will provide annual updates on the project and copies of relevant documentation to MAC.

Access to Project Area by Aboriginal Stakeholder Groups

If Aboriginal Stakeholders wish to access Aboriginal Heritage Sites within the Project Area this will be directed through MAC and co-ordinated by the Environment and Heritage Manager. All group members participating in site visits must comply with occupational health and safety requirements and will be accompanied by an appropriate Perdaman employee, except in the NHL area within Site F (Site ID 9439). For this site, those with connection to the site will be met at the gate and escorted to the site.

Heritage Monitors

Perdaman will engage two heritage monitors from MAC to oversee initial ground disturbance and to participate in salvage and relocation activities. The Environment and Heritage Manager will be the point of contact for the engagement of heritage monitors and will keep records of their engagement. Perdaman will reach agreement with the MAC in regard to the payments that will be made to the heritage monitors.

Records

The Environment and Heritage Manager will be responsible for recording all breaches of the AHMP or these Procedures and the subsequent investigation. An annual report on the number of Ground Disturbance Permits issued, any breaches of the AHMP or these Procedures will be provided to the Environment and Heritage Manager (or delegated representative).

Attachment B. Heritage Charter – Perdaman Urea Project



HERITAGE CHARTER – PERDAMAN UREA PROJECT

PROJECT DESTINY OVERARCHING POSITION FOR HERITAGE INTERACTION AND MANAGEMENT, INCLUDING ROCK ART AND MURUJUGA.

The Murujuga Rock Art Strategy

The Murujuga Rock Art Strategy (MRAS) outlines a long-term framework to guide the protection of the Aboriginal rock art (petroglyphs) located on Murujuga (the Dampier Archipelago and Burrup Peninsula). Its primary goal is to deliver a scientifically rigorous approach to monitoring, analysis and management that will provide an appropriate level of protection to the rock art. The strategy provides a framework to protect Aboriginal rock art from the airborne emissions created by Industrial development, in this same location.

The Murujuga Rock Art Strategy (MRAS) is a monitoring, analysis and decision making framework devised by the WA State Government which has been designed to protect Aboriginal rock art on Murujuga ([https://www.der.wa.gov.au/images/documents/ourwork/programs/burrup/Murujuga_Rock Art_Strategy](https://www.der.wa.gov.au/images/documents/ourwork/programs/burrup/Murujuga_Rock_Art_Strategy)).

The MRAS recognises that the petroglyphs are of immense cultural and spiritual significance to Aboriginal people, and of significant state, national and international heritage value. It also recognises that Murujuga is host to industry that contributes to the national, state and local economy and provides employment in the area. The WA Government entered into the Burrup and Maitland Industrial Estates Agreement Implementation Deed (the Burrup Agreement) with three Aboriginal groups in January 2003. The Burrup Agreement enabled the State Government to compulsorily acquire Native Title rights and interests in the area of the Burrup Peninsula and certain parcels of land near Karratha. The Burrup Agreement allows for industrial development to progress in parts of the Burrup Peninsula as well as providing for the development of a conservation estate and ensuring the ongoing protection of Aboriginal heritage values.

The scope of the Rock Art Strategy is to:

1. Establish an Environmental Quality Management Framework, including the derivation and implementation of environmental quality criteria (see MRAS Section 4.2);
2. Develop and implement a robust program of monitoring and analysis to determine whether change is occurring to the rock art on Murujuga (see MRAS Section 5.3);
3. Identify and commission scientific studies to support the implementation of the monitoring and analysis program and management;

4. Establish governance arrangements to ensure that:

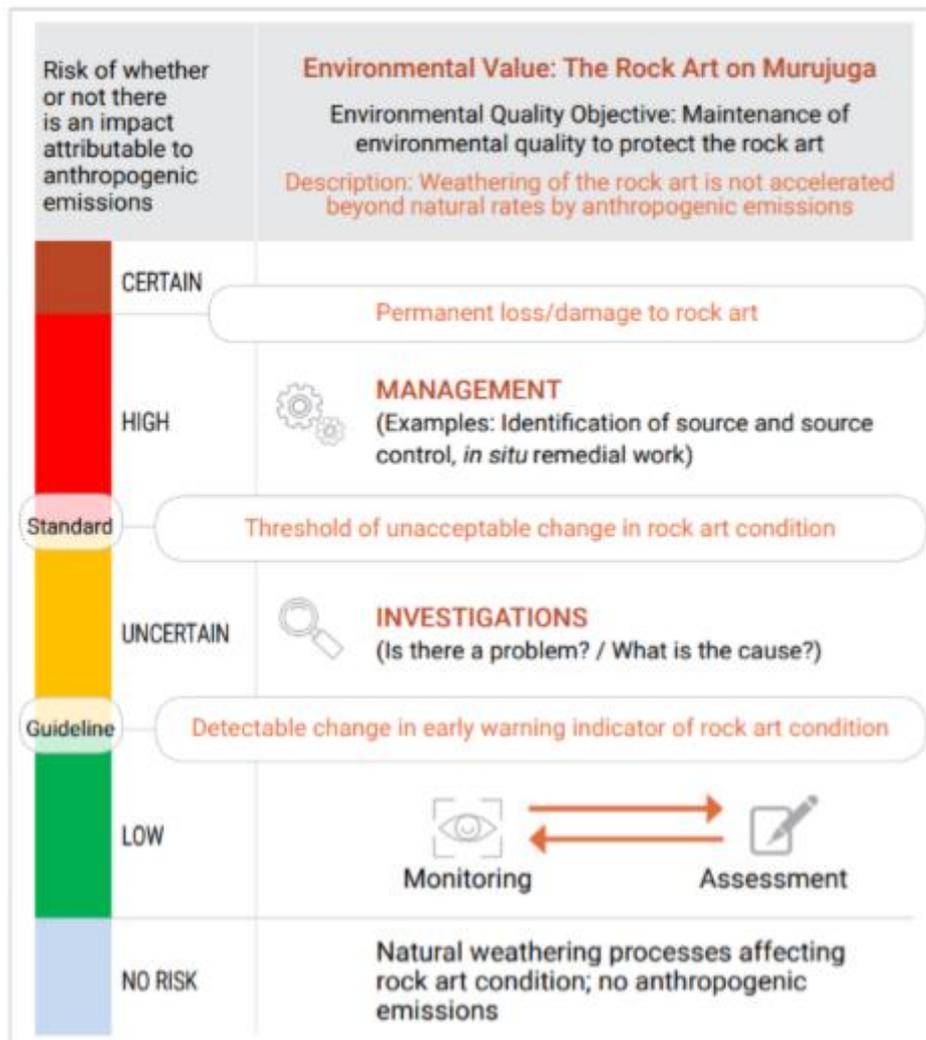
- > monitoring, analysis and reporting are undertaken in such a way as to provide confidence to the Traditional Owners, the community, industry, scientists and other stakeholders about the integrity, robustness, repeatability and reliability of the monitoring data and results; and
- > government is provided with accurate and appropriate recommendations regarding the protection of the rock art, consistent with legislative responsibilities.

5. Develop and implement a communication strategy in consultation with stakeholders.

In terms of future (i.e. current) development proposal(s) on Murujuga, particularly those proposed for the BMIEA industrial parcels, and those which are located within close proximity to the National Heritage Listed area, the Environmental Quality Management framework is the most relevant component of the MRAS. When the project application is successful, then the other components of the MRAS would become more relevant.

The MRAS (section 2.3) identifies the environmental and heritage legislative frameworks which are in place to provide for the management and protection of cultural, archaeological and natural values of Murujuga.

The Environmental Quality Management Framework for protecting the rock art on Murujuga (MRAS: Figure 3).



Background to the Project Position for heritage interaction and management.

The Dampier Archipelago (including the Burrup Peninsula) contains an internationally recognised and acclaimed collection of Aboriginal sites. In 2007, the information from more than 3,000 individual rock art and stone feature sites (JMcD CHM 2005, 2006b) was used to assess the scientific values of this place before it was added to Australia's National Heritage List (NHL: <https://www.environment.gov.au/heritage/places/national/dampierarchipelago>).

These records were listed in the (then) DIA Site Register (Lorblanchet 1983, 1992; McDonald and Veth 2009; Mulvaney 2015; Vinnicombe 2002).

The Burrup Peninsula is known to its Aboriginal custodians as Murujuga (meaning 'hipbone sticking out'). These days the Archipelago and its art province more widely are becoming known as Murujuga.

When the NHL Listing was made, a large proportion of the Burrup (86%) had not been disturbed, and the boundaries of the NHL listed place were based largely on an assessment of previous levels of disturbance (Figure 3). Disturbed landscapes were excluded from the listing. Of the National Heritage Listed land on the Burrup Peninsula, c. 50% has been designated as the Murujuga National Park. The remaining National heritage listed lands are outside the conservation estate.

This listing made under the EPBC Act, protects the art and stone features. The listing identified a number of criteria under which significance values can be attributed to individual sites and or motifs. The listed area is large and a relatively small proportion of the art has been systematically documented. There is still a limited understanding of this important heritage asset. The low level of public knowledge and appreciation for this rock art is largely because of this limited understanding.

The boundaries of Site F are not based solely on disturbance mapping. Systematic recording work undertaken as part of the UWA rock art field schools has recorded rock art in these areas. There are thus some lands within the proposed development area potentially worthy of listing on the National Heritage Estate. These have not been considered to date in any formal listing process.

The Burra Charter Process: steps in planning and managing places of cultural significance.

Best practice guidelines are provided by the ICOMOS Burra Charter as summarised below



The Burra Charter Process: flow chart from the *Australia ICOMOS Burra Charter, 2013, p10*.
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PROJECT DESTINY OVERARCHING POSITION FOR HERITAGE INTERACTION AND MANAGEMENT

Perdaman Chemicals and Fertilisers Pty Ltd

- Is committed to implementing for Project Destiny policies, procedures and actions that accord with the Burra Charter and harmonise with the West Australian government's Murujuga Rock Art Strategy.
- Will engage with Murujuga Aboriginal Corporation (MAC) relevant stakeholder to
 - enhance its understanding of the heritage and cultural history, use and fabric of Murujuga;
 - identify and understand obligations relevant to its use of land at Murujuga;
 - identify and understand future needs and resources;
 - identify and understand constraints, including potential to practicably ameliorate these;
 - identify and understand opportunities, including potential to practicably avail of these.
- Will Develop and implement Heritage management plans, procedures and actions that are consistent with the above.
- Will monitor the outcomes to review and revise these plans, procedures and actions where practicable to enhance heritage outcomes.

Mr Vikas Rambal
Chairman Perdaman

Mr Peter Jeffries
Chief Executive Murujuga Aboriginal Corporation

Attachment C. 2019 Heritage Survey Areas

