

Environmental Program

CULTURAL HERITAGE MANAGEMENT

BBA-ENP-1000-1400-0013

Revision	Date	Revision Description	Prepared	Reviewed	Approved
A0	1 May 2007	Draft for BBA review	SW		
A1	9 May 2007	Draft for DTAE review	IW		
B0	31 Oct 2007	Revised after audit and issued for DTAE approval	IW	JD	JC
B2	22 Jan 2008	Revised following DTAE comments	JRD		
B3	30 Jan 2008	Revised following DTAE/Heritage Tasmania comments	SW	JD	CF

Table of Contents

1.	PURPOSE AND SCOPE	3
2.	OBJECTIVES	3
3.	TARGETS	3
4.	REGULATORY AND CONTRACTUAL REQUIREMENTS	3
5.	TECHNICAL DOCUMENTS	4
6.	KEY ISSUES	4
7.	OPERATIONAL CONTROLS	4
8.	SITE ENVIRONMENTAL PLANS	6
9.	CONTINGENCY MANAGEMENT	6
10.	EVALUATING PERFORMANCE	7
11.	REPORTING	7

Operational Control Tables

Table OCO 13.1 Cultural Heritage Management

1. Purpose and Scope

This Environmental Program describes Cultural Heritage Management measures to minimise the impact of the design and construction of the Gunns pulp mill.

This Environmental Program forms part of the Bell Bay Alliance (BBA) Construction Environmental Management Plan (CEMP) and must be read in conjunction with the CEMP.

2. Objectives

1. Protect and minimise disturbance to Aboriginal values (including maintaining confidentiality of site locations).
2. Protect and minimise disturbance to historic heritage values.

3. Targets

1. No disturbance to historic heritage values beyond that detailed in the DIIS.
2. No disturbance to Aboriginal heritage values beyond that detailed in the DIIS.

4. Regulatory and Contractual Requirements

Refer to:

- CEMP Appendix B – Environmental Legislation Register
- CEMP Appendix C – Approvals Matrix
- CEMP Appendix D - Environmental Licences Register
- CEMP Appendix F – Environmental Commitments
- CEMP Environmental Obligations Register: GNS-OBL-1000-1400-001.

In particular, the following requirements are relevant:

- *Historic Cultural Heritage Act 1995*
- *Aboriginal Relics Act 1975*
- *Aboriginal and Torres Strait Islander Heritage Protection Act 1984.*

5. Technical Documents

The following background studies, research documents and assessments have been used to identify the key environmental aspects:

Reference	Document Title
http://www.gunnspulpmill.com.au/iis/	Bell Bay Pulp Mill Draft IIS and Appendices
http://www.gunnspulpmill.com.au	Supplementary Information

The following technical documents have been used to assist in identifying appropriate operational controls:

Availability	Document Title
Australia ICMOS	Burra Charter

6. Key Issues

Expert surveys have identified sites of Aboriginal and historic heritage significance both within and adjacent to the construction areas. Potential impacts on these sites include:

- Physical disturbance through clearing and construction activities;
- Damage to sites through clearing and construction activities; and
- Maintaining confidentiality of Aboriginal heritage sites.

7. Operational Controls

Environmental outcomes to be achieved include:

- No disturbance to sites of Aboriginal heritage significance which have been identified and indicated for protection;
- Relocation of identified sites of Aboriginal heritage significance due to construction undertaken by a Aboriginal Heritage Officer to the reserve around the Aboriginal relic designated as TASI 9903 in a culturally sensitive manner; and
- No disturbance to sites of historic heritage significance that have been identified and indicated for protection.

Areas of general sensitivity relating to cultural heritage management include:

- All Aboriginal heritage sites;
- All historic heritage sites,
- The shoreline area at the pulp mill site where there are a number of recorded historic heritage sites;

- The coastal crossing of the effluent pipeline outfall where there is the potential for further sites of Aboriginal heritage significance, and where further investigative work is required;
- The water supply pipeline area at Dilston between Station and Coulsons Creeks where there is the potential for further sites of Aboriginal heritage significance, and where further investigative work is required; and
- The pulp mill site, where a raised area has been identified as containing the edges of an artefact scatter, and where further investigative work is required.

Procedures to be followed in the event that Aboriginal heritage relics are located during clearing and construction activities are:

- cease works immediately within 100 m of the site;
- contact the Aboriginal Heritage Office within 24 hours;
- assess the characteristics, condition and values of the relics using suitably qualified specialists;
- arrange a field inspection with staff from the Aboriginal Heritage Office, if necessary, to identify regulatory implications and options for dealing with the Aboriginal heritage relic;
- engage with the Tasmanian Aboriginal Land and Sea Council on assessment and management options, as required; and
- depending on the regulatory options, determine appropriate actions with regard to the continuation of works, including, as appropriate, approval of a permitted action in writing by the Minister, on the recommendation of the Director.

The exact locality of aboriginal heritage sites will be maintained as confidential information and not be publicly available. No aboriginal heritage survey reports that will be publicly available, will have exact locations of aboriginal heritage sites or artefacts. Only the buffer zones around aboriginal heritage sites will be marked on site, but not exact locations.

Procedure to be followed in the event that further sites of Historic heritage significance are located during construction activities:

- cease works immediately within 100 m of the site;
- notify the director NPWS within 24 hours;
- assess the significance of the place utilising an appropriately qualified specialist;
- determine appropriate actions with regard to continuation of works; and
- construction activities must not recommence until written approval is received from the director NPWS

The operational controls for management of cultural heritage during design and construction are set out below.

Table	Title
OCO 13.1	Cultural Heritage Management

The operational controls include requirements and responsibilities for:

- Consultation

- Design of permanent works
- Design of temporary works
- Construction activities
- Commissioning and handover.

8. Site Environmental Plans

- Refer to SEP Register.

Site Environmental Plans (SEPs) detail practical environmental management measures to be implemented at specific worksites to minimise potential impacts of construction activity on the environment and community. They are designed to provide more site specific detail than is included in the Environmental Program and Operational Control tables.

The information contained in the SEPs is presented in tabular drawing format. This is to make them easy for use by all BBA site personnel, consultants and subcontractors.

The controls set out in the SEPs are drawn from the Environmental Programs.

The locations of Aboriginal heritage items should not be disclosed to anyone outside the BBA Alliance without the approval of the BBA Environmental Manager. SEPs will show buffer zones for aboriginal heritage sites but must not show exact locations or co-ordinates.

9. Contingency Management

The environmental risk assessment has identified the following circumstances which could occur outside normal operating conditions:

- A previously unrecorded site of historic heritage significance may be located during clearing or construction activities.
- A previously unrecorded site of Aboriginal heritage significance may be located during clearing or construction activities.

If these circumstances occur, the following contingency measures will be implemented:

- For historic heritage:
 - (a) cease works immediately within 100 m of the site;
 - (b) notify the director NPWS within 24 hours;
 - (c) assess the significance of the place utilising an appropriately qualified specialist;
 - (d) determine appropriate actions with regard to continuation of works; and
 - (e) construction activities must not recommence until written approval is received from the director NPWS
-
- For Aboriginal heritage:

- (a) cease works immediately within 100 m of the site;
- (b) contact the Aboriginal Heritage Office within 24 hours;
- (c) assess the characteristics, condition and values of the relics using suitably qualified specialists;
- (d) arrange a field inspection with staff from the Aboriginal Heritage Office, if necessary, to identify regulatory implications and options for dealing with the Aboriginal heritage relic;
- (e) engage with the Tasmanian Aboriginal Land and Sea Council on assessment and management options, as required; and
- (f) depending on the regulatory options, determine appropriate actions with regard to the continuation of works, including, as appropriate, approval of a permitted action in writing by the Minister, on the recommendation of the Director.

○ .

10. Evaluating Performance

The Operational Controls, together with the SEPs are used as the basis for evaluating performance.

Refer to:

- BBA-PLN-1000-1400-0003 Aboriginal Heritage Management Plan.
- CEMP Appendix I – Internal Environmental Audit Schedule.
- CEMP Appendix J – External Environmental Audit Schedule.

Environmental Checklists are used for evaluating performance.

Refer to:

- BBA-CKL-1000-1400-013A Cultural Heritage Management.

11. Reporting

Refer to:

- CEMP Appendix K – Environmental Reporting Program.

The BBA Environmental Manager will undertake ongoing engagement with the Tasmanian Aboriginal Land and Sea Council regarding further aboriginal heritage survey work and TASI site management, including provision of aboriginal survey reports.