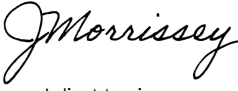



NORTHERN GOLDFIELDS INTERCONNECT

Cultural Heritage Management Plan

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			Access and Approvals Lead	NGI Access and Approvals Manager	General Manager IPA
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			Access and Approvals Support	Access and Approvals Lead	NGI Access and Approvals Manager

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1. INTRODUCTION

APA Northern Goldfields Interconnect Pty Ltd, an entity of the APA Group (herein referred to as APA), is proposing to design, build and operate the Northern Goldfields Interconnect (NGI) Pipeline; a new buried pipeline approximately 580 km in length, commencing at Ambania (located approximately 50 km east of Geraldton), connecting into the existing Goldfields Gas Pipeline (GGP) at approximately 40 km south of Leinster (**Figure 1**). The NGI pipeline will include associated aboveground facilities sparsely located along the route of the pipeline, including a new compressor station in Ambania. The NGI pipeline and associated aboveground facilities (herein referred to as the NGI project or project) will be contained within Pipeline Licence 129.

1.1 Overview

The development and implementation of a Cultural Heritage Management Plan (CHMP) is an obligation agreed to during project stakeholder and regulatory consultation for the APA Group (APA) Northern Goldfields Interconnect Project (the Project). This obligation is also a condition of Ministerial Statement 1184 under the Environmental Protection Act 1986 (WA) in respect of the Project. Refer to **Table 1** for the Conditions to be implemented into the CHMP.

This document, the Northern Goldfields Interconnect (NGI) CHMP, sets in place a formal mechanism for the management of cultural heritage within the area of the Project (Project Area). Key users of this CHMP will be Traditional Owners, appropriate knowledge holders, APA management, staff and contractors. Through this CHMP, APA will ensure that all employees and contractors involved in the construction phase of the Project are fully aware of their obligations to meet the commitments made to Traditional Owner stakeholders regarding the protection of and the management of impacts to cultural heritage sites in the proximity of the NGI. This CHMP also ensures project participants are aware of their obligations under Commonwealth and State legislation to avoid and minimise impacts on Aboriginal cultural heritage. This CHMP is intended to be revised and updated as required during the lifecycle of the Project.

The Project Area intersects the area of the following native title claims and determinations (some current and some former):

- Yamatji Nation ((where native title was determined not to exist in most areas, but where the Yamatji Nation ILUA applies)
- Badimia (where native title was determined not to exist)
- Wajarri Yamatji (where a current registered native title claim is in place)
- Mullewa Wadjari (where a current registered native title claim is in place);
- Badimaya Barna Guda People (where a previous native title claim was dismissed)
- Wutha (where a previous native title claim was dismissed) and
- Darlot (where a current native title claim was dismissed).

Table 1: Ministerial Statement 1184 conditions to be implemented into the CHMP

Item	EPA Conditions	CHMP Section
4-1 (1)	The proponent must implement the proposal to meet the following objective: Avoid, where possible, and otherwise minimise, project attributable direct and indirect impacts to social, cultural, heritage and archaeological values within and surrounding the development envelope, including from, but not limited to: (a) Disturbance of the ground that may impact registered Aboriginal heritage sites; (b) Potential loss of access to areas to undertake traditional activities; and (c) Indirect impacts to social and cultural places, and activities.	Section 1.2 Objective
4-2	Prior to construction activities, the proponent shall finalise and submit a Cultural Heritage Management Plan, in consultation with relevant traditional owner groups and appropriate knowledge-holders, to meet the objective specified in condition 4-1.	Submitted to EPA
4-3 (1)	The Cultural Heritage Management Plan required by condition 4-2 must: specify the objective to be achieved, as specified in condition 4-1;	Section 1.2 Objective
4-3 (2)	Specify risk-based management actions that will be implemented to demonstrate compliance with the objective specified in condition 4-1;	Section 6.6.3 Analysis and Review
4-3 (3)	Include a framework for ongoing consultation with the relevant traditional owners and other relevant stakeholders during the life of the proposal;	Section 2.4.2 Ongoing Consultation
4-3 (4)	Include a procedure, in the instance of any previously unrecorded heritage places being identified within the development envelope, to avoid the area and must contact the relevant traditional owners and the Department of Planning, Lands and Heritage within ten (10) days of discovery, prior to implementing mitigation actions required;	Section 5.2.2 Previously Unidentified Indigenous Sites
4-3 (5)	Include a procedure to ensure that management, staff and contracting personnel are made fully aware of their obligations in the Cultural Heritage Management Plan approved by the CEO, and under the Aboriginal Heritage Act 1972;	Sections 4 Cultural Heritage Impact Assessment and 6.6.3 Analysis and Review
4-3 (6)	Specify measurable management target(s) to determine the effectiveness of the risk-based management actions in condition 4-3(2);	Section 6.6.3 Analysis and Review
4-3 (7)	Specify monitoring to measure the effectiveness of management actions against management targets;	Section 6.6.3 Analysis and Review
4-3 (8)	Specify a process for revision of management actions and changes to proposal activities, in the event that the management targets are not achieved. The process must include an investigation to determine the cause of the management target(s) not being met;	Section 6.6.3 Analysis and Review
4-3 (9)	Provide the format and timing to demonstrate that condition 4-1 has been met for the reporting period in the Compliance Assessment Report required by condition 9-6 including, but not limited to: (a) verification of the implementation of management actions; and (b) reporting on the effectiveness of management actions against management target(s)	Section 6.6.3 Analysis and Review
4-3 (10)	Provide evidence of consultation required by condition 4-2 and the outcomes of this consultation	Section 2.4.1 Engagement to Date

1.2 Objective

The objective of this CHMP is to avoid, where possible, and otherwise minimise, Project attributable direct and indirect impacts to social, cultural, heritage and archaeological values within and surrounding the development envelope. In relation to Aboriginal cultural heritage that includes impacts from, but not limited to:

- (a) disturbance of the ground that may impact registered Aboriginal heritage sites;
- (b) potential loss of access to areas to undertake traditional activities; and
- (c) indirect impacts to social and cultural places, and activities.

1.3 Purpose

This CHMP provides a formal framework for the protection and management of Aboriginal cultural heritage and provides a plan through which APA will achieve its vision of best practice heritage management. Specifically, this CHMP sets out the process for APA to:

- Work in partnership with Traditional Owners and appropriate knowledge holders through the establishment of a formal mechanism for collaborative cultural heritage management
- Minimise direct and indirect impacts to social, cultural, heritage and archaeological values through responsible heritage management.
- Comply with all Government legislation, policy and Project approvals
- Implement a communication protocol specifically for Aboriginal cultural heritage which embodies the principles of Free and Prior informed Consent (FPIC)
- Implement recommendations made by Traditional Owners and appropriate knowledge holders in relation to cultural heritage management, where agreed
- Where appropriate and safe to do so, engage Traditional Owner monitors for pre-construction clearance surveys prior to or during ground disturbing works i.e. vegetation and topsoil removal in order to manage any artefacts that may be uncovered as a result of the works.
- Require inductions for key leadership personnel in the area of Aboriginal cultural heritage and engagement.
- Ensure cultural awareness sessions for all Project personnel
- Ensure training for all relevant employees and contractors on cultural heritage management
- Clearly define roles and responsibilities under this CHMP; and
- Ensure reporting of non-compliance and the implementation of effective corrective action.

1.4 Company vision and approach

This CHMP for the Project has been developed to provide APA with the necessary direction to achieve the company's vision in relation to Aboriginal cultural heritage management in the Project Area.

The CHMP demonstrates APA's commitment to ensuring that the Project's impact on Aboriginal heritage is kept to a minimum and risks are managed and mitigated whenever possible. Specific management strategies have been developed in consultation with the Traditional Owners and appropriate knowledge holders, based

on the outcomes of the heritage surveys undertaken across the NGI pipeline (NGIP) corridor with Yamatji Nation traditional owners (including the former Southern Yamatji, Mullewa Wadjari, and Widi Mob claims), Wajari Yamatji, Badimia traditional owners (including BBGP), Darlot traditional owners, and the Wutha traditional owners.

To facilitate a best practice approach, APA adopts the 'avoidance' of Aboriginal heritage values as the top-tier management approach. In relation to the Project design this approach included re-alignment of the NGI pipeline and a reduction of the width of the construction right-of-way to prevent or minimise disturbance to known and newly identified sites. A number of Aboriginal sites have been avoided along the alignment through the application of this approach, which has included continual engagement with Traditional Owners and appropriate knowledge holders.

Initially, 36 Aboriginal heritage sites were within the indicative disturbance footprint of the proposal. However, based on the consultative surveys conducted with the respective Traditional Owner groups between November 2020 and October 2021, further refinement of the pipeline alignment and footprint has been undertaken such that only 11 Aboriginal heritage sites now occur within the Project Area, of which only 4 may be directly impacted, if unavoidable.

1.5 Scope of this Cultural Heritage Management Plan

This CHMP covers all construction and related activities that APA will undertake in the Project Area during the construction phase of the Project, and will continue until 2 years after practical completion of the construction. It is intended that during this post-construction phase, APA will consult with the relevant Traditional Owner Groups and Traditional Owner representatives to develop this CHMP into an ongoing plan which is more focussed on the long term operational and maintenance phase of the Project. The revised plan will include regular communication with each Traditional Owner Group, on a least an annual basis.

This CHMP formalises and guides the management of all cultural heritage matters within the Project Area. These matters consist of, but are not limited to, archaeological items such as stone and other artefacts scatters, standing stones, stone arrangements and shell middens. It also covers matters relating to a range of ethnographic sites including, but not limited to, water courses, creek lines, clay pans, vegetation types, specific tree species, animal burrows and animal shelters.

This CHMP refers to Aboriginal heritage 'sites' and 'places' throughout. To avoid doubt, the term 'site' is used in a general sense in many cases in this CHMP, and is not necessarily intended to indicate that the relevant site or place is in fact an Aboriginal 'site' for the purposes of (and as defined under) the *Western Australian Aboriginal Heritage Act 1972 (WA) (AHA)* and to the extent in operation, *The Aboriginal Cultural Heritage Act (WA) 2021 (ACHA)*.

1.6 Extent of area covered by this CHMP

This CHMP covers the total NGI pipeline Project Area and includes:

- The approximately 580 km long buried pipeline, commencing at Ambania, located approximately 50 km east of Geraldton, connecting into the existing Goldfields Gas Pipeline (GGP) at approximately 40 km south of Leinster. (Refer to **Figure 1**). Land disturbing activities associated with the construction of the pipeline will be confined to the Construction Right of Way (CROW), which is a nominally 30 m wide construction area for the length of the pipeline, covering approximately 2,262 ha.
- The Rosewick offtake, being the gas offtake point from the Dampier to Bunbury Natural Gas Pipeline (KP0), covering approximately 0.25 ha;
- The Ambania compressor station, situated at KP1, covering approximately 7 ha. The compressor station pressurises the gas for transportation through the NGI pipeline to the GGP
- The Yoweragabbie scraper station; situated at K281 to KP282, covering approximately 4.9 ha
- The Carlinda Main Line Valve Station (MLV), situated at KP147, covering approximately 0.15 ha
- The Dandaraga MLV, situated at KP465, covering approximately 0.15 ha
- The Wildara delivery station, situated near the end of the pipeline at KP579, covering approximately 0.6 ha. The delivery station receives and filters gas before delivery into the GGP
- The Weebo inlet station, situated at the end of the NGI, being the connection point between the NGI's Wildara delivery station and the GGP, covering approximately 0.06 ha

The pipeline will generally be buried via trenching at a minimum depth of 0.75 m. However, it may be deeper (up to approximately 2 m–10 m) at specific locations by agreement with stakeholders, at third party infrastructure crossing locations (e.g. telecommunication infrastructure, water infrastructure, roads/tracks and railways) and at locations of cultural and environmental significance. At locations where the disturbance of surface environmental and heritage features are to be avoided, excavation will be by means of horizontal directional drilling (HDD) to avoid disturbance of the surface values or infrastructure.

To meet due diligence heritage requirements in line with the (AHA), APA facilitated archaeological and ethnographic heritage surveys across the entire length of the proposed NGIP alignment, inclusive of the aboveground facility locations. These surveys were conducted as seven sections based on the country identified as being relevant to each of the Traditional Owner Groups.

NORTHERN GOLDFIELDS INTERCONNECT Cultural Heritage Management Plan

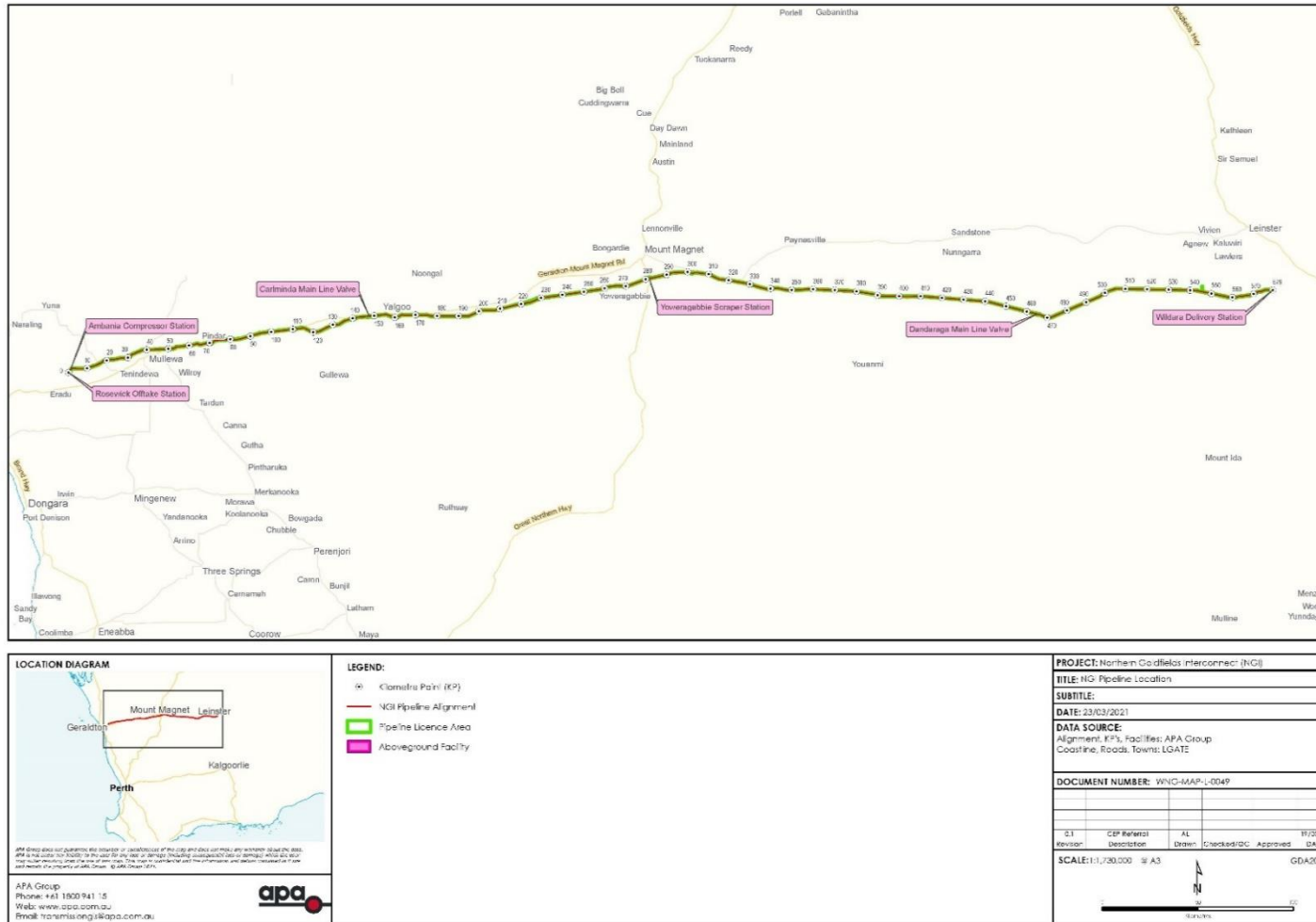


Figure 1: Northern Goldfields Interconnect Alignment Locality Map

1.7 Related documentation

This CHMP is a component of APA's integrated Health, Safety, Environment and Quality (HSEQ) Management System. On a project level it primarily interacts with the following APA documents:

- APA HSE EP 13.07.02 Aboriginal Cultural Heritage Management Plan
- 20199-PL-LH-0002 - NGI Stakeholder Engagement Strategy; and
- 20199-PL-HSE-0007 – NGI Construction Environment Plan

The requirements of this CHMP will be integrated into the Project site induction process for all contractors engaged in the Project. The induction will ensure that all site project personnel are aware of their obligations under this CHMP and relevant legislation. The induction will also outline the Aboriginal heritage sites, measures for demarcating and protecting these sites and where applicable the requirement not to disturb them.

1.8 Roles and responsibilities

This CHMP will be monitored and overseen by the APA project management team, however APAs' main construction contractor will primarily be responsible for delivering the construction activities in accordance with this CHMP. APA's Cultural Heritage Advisor and Construction Manager will coordinate the delivery of on-ground heritage activities and monitoring.

In the event that expert advice is required, the Cultural Heritage Advisor will engage relevant senior Traditional Owner knowledge holders to provide this advice and/or advice on the engagement of professional archaeologists and anthropologists, as deemed necessary.

2. RELEVANT LEGISLATION AND APPROVALS

The key heritage legislation applicable to the Project is discussed in the sections below.

2.1 State Legislation

In Western Australia, the primary instrument for the protection and management of cultural and heritage is the Aboriginal Heritage Act 1972 (AHA and to the extent in operation, The Aboriginal Cultural Heritage Act (WA) 2021). During the environmental approvals process, cultural heritage is also indirectly covered by the *Environment Protection Act 1986*.

2.1.1 Aboriginal Heritage Act 1972

The AHA provides for the recognition, protection and preservation of Aboriginal sites in Western Australia. It is an offence under section 17 of the AHA to excavate, destroy, damage, conceal, or in any way alter an Aboriginal site. If an owner of land wishes to use the land in any way that might breach section 17, they are able to apply for consent under section 18 (2) of the AHA. Consent has the effect of ensuring the activities of the consent holder, carried out in accordance with the consent, do not constitute a breach of section 17.

Applications for consent to the disturbance of Aboriginal sites under section 18 must be made to the Aboriginal Cultural Material Committee (ACMC). The ACMC makes recommendations to the WA Minister for Aboriginal Affairs about whether consent should be granted and under which conditions. The Minister then makes a decision based on the recommendations of the ACMC and the general interest of the community.

Section 57 of the AHA outlines the penalties that can be applied in relation to offences under the AHA. In the case of an unlawful disturbance by an individual, penalties currently comprise fines from \$20,000 to \$40,000 and/or imprisonment for nine months to two years and a daily penalty of \$400.

An unlawful disturbance by a body corporate may result in penalties that comprise fines ranging from \$50,000 to \$100,000 and a daily penalty of \$1,000.

Definition of Aboriginal Site

The AHA protects the rights and interests of Aboriginal people and their cultural heritage. It is applicable to both places (section 5) and objects (section 6). Section 4, defines an Indigenous site as:

- 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 the use for, any purpose connected with the tradition cultural life of the Aboriginal people, past or present.
- Any sacred, ritual or ceremonial site, which is of importance and special significance to persons of Aboriginal descent.
- Any place which, in the opinion of the Committee (i.e. the ACMC), 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.
- Any place where objects to which the AHA applies are traditionally stored, or to which, under the provisions of the AHA, such objects have been taken or removed.

Section 39 of the AHA explains that one of the functions of the ACMC is to evaluate on behalf of the community the importance of places and objects claimed to be associated with Aboriginal persons.

Proposed amendments to the Aboriginal Heritage Act 1972 and Aboriginal Cultural Heritage Act 2021

In March 2018, the Western Australian Department of Planning, Lands and Heritage (DPLH) released a discussion paper on a review of the AHA. The consultation paper posed a series of questions on how the AHA operates to help determine its effectiveness, identify any gaps, and encourage ideas for improvements to the legislation.

The proposed amendments have been enacted but are yet to be in force in full. To the extent in operation, *The Aboriginal Cultural Heritage Act (WA) 2021* (ACHA) applies to this CHMP, however at this stage, it is unlikely the amendments will fully operational before construction of the project concludes.

The following sections of this CHMP have been drafted in accordance with the current requirements under the AHA, however have considered the new legislative changes

and sought to implement the improved stakeholder engagement and heritage protection outcomes contemplated by the replacement legislation to the extent which is currently defined. This CHMP will be revised and updated to meet the requirements under the replacement legislation when required, and APA will consult with the appropriate Traditional Owner stakeholders during the revision process.

2.1.2 Environmental Protection Act 1986 (WA)

APA has referred the project under the *Environmental Protection Act 1986*. The Environmental Protection Authority (EPA) assessed the referral and concluded that the proposal was environmentally acceptable and it was approved to be implemented via the issuance of Ministerial Statement 1184 on 2 February 2022. The approval allows for the clearing up to 1,930 ha of native vegetation.

2.2 Commonwealth Legislation

2.2.1 Aboriginal and Torres Strait Islander Heritage Protection Act 1984

The *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* (Cth) enables the Australian Government to respond to requests to protect important Aboriginal areas and objects under threat, if it appears that the applicable State or Territory laws have not provided effective protection. The relevant Commonwealth Minister can make special orders, called declarations, to protect traditional areas and objects of particular significance to Aboriginal people in accordance with Aboriginal tradition from threats of damage or desecration. The Minister cannot make a declaration unless an Aboriginal person (or a person representing an Aboriginal person or group) has requested it. The power to make declarations is meant to be used as a last resort, after the relevant processes of the State or Territory have been exhausted.

2.2.2 Native Title Act 1993

The *Native Title Act 1993* allows the recognition under Australian Law of the rights and interests in land and waters of Indigenous and Torres Strait Islander people according to their traditional laws and customs.

Section 211 of the *Native Title Act 1993* protects the right of Native Title holders to carry out certain activities on their traditional lands and waters. These activities include fishing, hunting, gathering, and visiting the areas in relation to cultural practices.

2.2.3 Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation 1999* (EPBC Act) among other things establishes the National Heritage list which includes natural, Indigenous, and historic places that are of outstanding value to the nation. The Act also establishes the Commonwealth Heritage List, which comprises natural, Indigenous and historic places on Commonwealth Lands and waters under Australian Government control, and identified by the Commonwealth Minister for the Environment, as having Commonwealth heritage values.

APA has referred the project under the EPBC Act as it has the potential to impact on matters of national environment significance (MNES) namely, listed threatened species and communities. The Department of Agriculture, Water and Environment (DAWE) is finalising the referral (including the additional supporting information) and has drafted a 'Not a Controlled Action – Particular Manner' decision notice. This notice does not include any particular manner conditions specifically related to heritage. This approval will be in place prior to the commencement of construction.

2.3 Native Title

The NGI pipeline alignment intersects various forms of claimed or determined Native title, as discussed in more detail below.

2.3.1 Registered Claims

The NGI pipeline area intersects with three registered and current Native Title Claims namely:

- Darlot (WC2018/005 and WAD142/2018);
- Mullewa Wadjari Community (WC1996/093 and WAD21/2019); and
- Wajarri Yamatji (WC2004/010 and WAD28/2019)

Darlot Native Title claim (WC2018/005 and WAD142/2018)

The amended Darlot Native Title claim (WC2018/005 and WAD142/2018) application satisfied all the conditions of sections 190B–190C of the *Native Title Act* and has therefore been accepted for registration and was entered onto the Register of Native Title Claims on 9 July 2021.

Mullewa Wadjari Community Native Title claim (WC1996/093 and WAD21/2019)

This part of the Mullewa Wadjari claim is the remaining portion of their claim that was not determined as part of the Yamatji Nation determination (see below). The claim has been active since it was filed on 19 August 1996. The area of the Mullewa Wadjari claim for the NGI Project overlaps that of the Wajarri Yamatji Claim (see below).

Wajarri Yamatji native Title claim (WC2004/0101 and WAD28/2019)

The Wajarri Yamatji Native Title claim has been accepted for registration, and has not yet been the subject of a determination (or dismissal of the claim).

2.3.2 Determinations of Native Title

Determinations of Native Title have been made for the Yamatji Nation and for the Badimia.

Yamatji Nation determination

The Yamatji Nation determination was a consolidation of the Southern Yamatji, Mullewa Wadjari Community, Hutt River and Widi Mob claims within the Yamatji Nation Claim. Settlement was reached for these parties and the State of Western Australia on 7 February 2020 as part of the Yamatji Nation native title settlement. Under the Yamatji Nation determination, native title was determined not to exist in most of the determination area, except for some discrete parcels where native title was determined to exist.

An Indigenous Land Use Agreement (ILUA) between the Yamatji Nation and the State of Western Australia was registered on 30 July 2020 (with 'conclusive registration' under the ILUA being finalised on 26 October 2020). The Yamatji Nation ILUA is active, and provides for the recognition, protection, and preservation of the heritage and culture of Yamatji Nation peoples within the Agreement Area. It also outlines the processes and procedures relating around Aboriginal Heritage Agreements, both for the State and Proponents. As part of the grant of the NGI Pipeline project approvals, it is required that APA enters into the Yamatji Proponent Standard Heritage Agreement as referenced in the abovementioned ILUA.

Badimia determination

On the 25 May 2015 the Badimia claim for native title was the subject of a determination that native title does not exist in any part of the land and waters within the claim area. Notwithstanding the fact that native title was determined not to exist in the area. APA has consulted with the Badimia claimants (see below).

2.3.3 Unclaimed (no current claims or determination for Native Title)

There is a section of land between the Badimia determination and the Darlot Claim for which currently native title was determined not to exist in the area. Within this area, there were two previous claims for Native Title which were each recently dismissed, being:

- Wutha People (WC1999/010 and WAD6064/1998); and
- Badimaya Barna Guda People (WC2020/001 and WAD7/2020).

Notwithstanding the fact that the native title claims were dismissed, the above former claimants were invited to take part in the Heritage Surveys for the Project and have been consulted regarding the Project.

2.4 Relationship Agreements

The Project approvals granted to APA under the Land Administration Act 1997 (WA) and the Petroleum Pipelines Act 1969 (WA) (PPA) were subject to the provisions of section 24KA of the Native Title Act. As such, ILUAs will not be required for the Project.

APA has proposed that APA and each of the Traditional Owners' Groups and appropriate knowledge holders (Groups) enter into a Relationship Agreement. These agreements are being developed in consultation with each of the Traditional Owner Groups. Under these agreements each party acknowledges that they have, and/or desire to have, a good working relationship and have been actively engaged in discussions relating to the Project. As part of the engagement with the Traditional Owner Groups for the Project, APA acknowledges that each of the Traditional Owner Group(s) speaks for country within the Project Area. These Relationship Agreements set out the basis of the collaboration between APA and the Traditional Owner Groups in respect of the Project.

Under these Relationship Agreements, both APA and the Traditional Owner Groups acknowledge that they are making a commitment to cooperate and work with each other so Traditional Owner Group members may have the benefit of the opportunities that will arise from the Project and to give APA certainty of the Traditional Owner

Groups' support for the Project as it relates to the Project Area. APA and the Traditional Owners' representatives acknowledge that APA has undertaken the heritage surveys with assistance from the Traditional Owner Group members in relation to Aboriginal sites within the Project Area.

The provisions of the various Relationship Agreements give expression to the NGI Stakeholder Engagement Strategy by committing APA to consultation with the Traditional Owner Groups in relation to the protection and management of Aboriginal cultural heritage values. Amongst others, the Relationship Agreements include the following overarching provisions:

- Section 18 AHA applications, and applications for licences under certain other legislation, will require the free, prior informed consent of the relevant Traditional Owner Group
- APA and the Traditional Owner Groups will maintain regular contact to discuss the status of the project, planned activities that may affect heritage areas, activities to reduce the environmental impact of the project and the operation of the relevant agreements
- APA will keep the Traditional Owner Groups informed of potential employment and commercial opportunities related to the project
- Arrangements for the engagement of Traditional Owner Group members on heritage surveys, the use of heritage specialists nominated by the Traditional Owner Group and the payment of costs related to consultation and surveys on the project
- Engagement of Traditional Owner Group members as heritage and environmental monitors during certain ground disturbing and compliance monitoring activities.

2.4 Stakeholder Consultation

2.4.1 Engagement to Date

APA has undertaken extensive consultations with the Traditional Owners and Traditional Owner representatives with the planning and design of the NGI Project. Consultation was undertaken by way of meetings on country, in the regional areas of Geraldton, Mt Magnet, Leonora and Perth (both in-person and on line as COVID impact allowed), and by correspondence (email and phone), in addition to the specific heritage survey consultations. A summary of engagement undertaken to date with the Traditional Owner Groups and representatives is presented in **Table 2**.

APA and the Traditional Owners' Representative each acknowledge that they have and/or desire to have a good working relationship and have been actively engaged in discussions relating to the Project since 2020. They acknowledge they are making a commitment to cooperate and work with each other so Traditional Owner Group members can take advantage of the opportunities that will arise from the Project and to give APA certainty for the Project as it relates to relevant part/s of the Project Area.

Aboriginal heritage surveys of the NGI pipeline licence area have been undertaken, by Terra Rosa Consulting, Horizon Heritage Management, Brad Goode & Associates, and SandS. The Aboriginal heritage surveys were completed with assistance from the Traditional Owner Representative Group members, and have contributed to the

recommendations in the survey reports, in relation to Aboriginal Sites within relevant part/s of the Project Area. A copy of the Aboriginal Heritage survey report(s) has been provided to each relevant Aboriginal group representative for their agreement prior to finalisation.

The main objectives for the surveys were to disclose the NGI Proposal to all interested parties, to identify and record archaeological and ethnographic aboriginal cultural heritage sites within the CROW, and to consult with Traditional Owners and Traditional Owner representatives to ensure full information was provided about the NGI Project.

APA and the Traditional Owners' Representative each acknowledge that APA has undertaken the heritage surveys with assistance from the Traditional Owner Group members in relation to Aboriginal Sites within relevant part/s of the Project Area.

The Traditional Owners' Representative:

- acknowledges that Traditional Owner Group members have contributed to the recommendations made in the Survey Report prepared following the heritage surveys;
- acknowledges that it has been provided with a copy of the Survey Report; and
- endorses the recommendations made in the Survey Report

Table 2: Stakeholder Engagement to Date

Stakeholder	Date/s	Issues / Topics Raised	Outcomes
<i>Traditional Owners and Native Title Parties</i>			
Badimia People	07/07/2020 – ongoing	<ul style="list-style-type: none"> • Direct support with Aboriginal heritage surveys, and advice regarding preferred heritage specialist providers. • Formal engagement and undertaking of heritage surveys together with Terra Rosa Consulting. • Formal notification of the pipeline licence application submitted to DMIRS. • Participation in Cultural heritage surveys including gaining their acceptance of the outcomes and recommendations in the Survey reports. • Ongoing communication regarding the heritage monitoring for the activity. • Notified of planned community opportunity forums being organised by APA and Nacap for employment and business opportunities on the project. • Provision of a relationship agreement. 	<ul style="list-style-type: none"> • Engagement has been positive and no concerns have been raised to date. • Discussion about further involvement in the construction stage of the Proposal. APA is conducting local and Indigenous community engagement forums to present the opportunities that Nacap as the primary contractor has on the project, for both individuals and businesses. • Badimia requested funding for two projects, which APA has agreed to. • Badimia and APA further discussed management of site and monitoring based on Heritage surveys. APA has agreed to implement the best outcome recommendations .i.e. HDD under rivers, which was then agreed to by the Traditional Owners. • The Group has provided consent for section 18 applications, where impacts could not be completely avoided, in accordance with the agreed management of site and Heritage monitors being engaged. • Both BBBAC and BLAC have had board meetings and have accepted the APA Offer with the signing undertaken by both parties. • APA and Badimia discussing logistics for heritage monitors ready for construction through Badimia land
Badimaya Barna Guda People (BBGP)	26/06/2020 - ongoing through the Badimia People	<ul style="list-style-type: none"> • APA discussed and agreed with the Badimia and BBGP preferred survey consultants to include the BBGP as part of the heritage surveys for the Badimia. • Formal notification of the pipeline licence application submitted to DMIRS. • Participation in cultural heritage surveys including gaining their acceptance of the outcomes and recommendations in the Survey reports. 	<ul style="list-style-type: none"> • BBGP claim dismissed, however APA continue to consult through the Badimia (see above). • Engagement has been positive and no concerns have been raised to date.
Southern Yamatji , Mullewa Wadjari, Widi Mob now amalgamated into Yamatji Nation (Managed through Yamatji Southern Regional Corporation (YSRC))	09/06/2020 - ongoing	<ul style="list-style-type: none"> • Discussion with representative bodies and formal engagement of preferred heritage specialist to undertake surveys. • Formal notification of the pipeline licence application submitted to DMIRS. • Expressed thanks for the opportunity to work with APA on the proposed pipeline through Widi lands. • Discussed possible employment opportunities in pipeline construction and/or any monitoring of ground disturbance. APA advised that there will be a Local Indigenous Engagement policy for the project and every contractor that tenders for the work, will be expected to adhere to that policy. • Participation in cultural heritage surveys including gaining their acceptance of the outcomes and recommendations in the Survey reports • Provision of a relationship agreement. 	<ul style="list-style-type: none"> • Discussion about further involvement in the construction stage of the Proposal. APA is conducting local and Indigenous community engagement forums to present the opportunities that Nacap as the primary contractor has on the project, for both individuals and businesses. • Yamatji Nation Negotiation protocol has been agreed to. • Yamatji Nation and APA further discussed management of site and monitoring based on Heritage surveys. • Yamatji nation has a new preferred consultant, SandS, who APA is now working with. • Yamatji nation provided S18 Consent. • Process is now underway for ██████████ with the application going through in the December ACMC meeting with no further information requested. • APA and Yamatji Nation worked together to address the remaining sites within the Yamatji nation area with the support of SandS. YSRC's Heritage Manager has been extremely helpful and has attended meetings with



Stakeholder	Date/s	Issues / Topics Raised	Outcomes
			<p>APA and DPLH regarding the sites. HIS forms have now been provided to DPLH based on the additional information provided by SandS.</p> <ul style="list-style-type: none"> • YSRC heritage manager provided verbal feedback on the CHMP, which was incorporated into the document prior to submission to EPA. • The Yamatji Nation board has endorsed the Relationship Agreement Engagement has been positive and no concerns have been raised to date. • APA and YSRC's Heritage Manager discussing logistics for heritage monitors ready for construction through Yamatji Nation
Darlot	30/06/2020 – ongoing	<ul style="list-style-type: none"> • Initial discussions regarding heritage surveys conducted with Ron Harrington Smith (on behalf of June Harrington Smith), prior to the forming of the Darlot Heritage Working Group. • Discussion about the Darlot Heritage Working Group's preferred heritage specialist. • Formal notification of the pipeline licence application submitted to DMIRS. • Discussion of HDD installation methods proposed for creek crossings and the need to undertake geotechnical works for the HDD design. It was discussed that the geotechnical drill holes need to be as close to the creeks as possible, preferably at the top of the creek banks on each side of the creeks. It was agreed that the geotechnical work can occur at the top of each creek bank and it would only have minimal impact. • The Darlot Group expressed concerns regarding disturbance around [REDACTED]. It was requested that no excavations were undertaken within 150 m [REDACTED]. The Group also explained that there is a Native Title Claim [REDACTED] and if any work was to occur, a section 18 approval would need to be applied for and granted. APA explained the need for access [REDACTED] for all the construction equipment, the building of a crossing in the creeks and that the banks of the creeks may need to be "laid back" to allow vehicles and construction equipment [REDACTED]. On further discussion, the Darlot Group suggested that some work may occur. However, it would need to be accessed, well in advance, by the heritage monitors and construction representative so that the monitors can go back to the Darlot Group before giving any approval. • The Darlot Group wanted to understand what stops people from wandering off into the bush. It was explained that during the induction it is strongly stressed the importance to stay within the cleared construction area. No one, vehicle or machine is permitted to leave the CROW. • Discussed the Cultural Awareness information session and that, for a crew that is breaking ground (e.g. the clear and grade crew), a more specific information session is to be held with them. The Darlot Group advised they were happy with this. • Opportunities for local people and companies to work on the pipeline was raised by the Darlot Group. APA explained that there will be a Local Indigenous Engagement policy for the project and every contractor that tenders for the work, will be expected to adhere to that policy. The Darlot Group will supply a list of people and Indigenous companies that would be interested. • [REDACTED] discussed the sensitive area [REDACTED] which partially intersects the CROW, and preventing people from accessing the area. APA advised the buffer zone for the sensitive area will not be depicted in project drawings or alignment sheets, so as to maintain the restricted knowledge of the area, and no 	<ul style="list-style-type: none"> • APA have engaged the preferred consultant as nominated by the Darlot Heritage Working Group (which represent the Darlot people). • Engagement with the Darlot Heritage Working Group has been positive. • Approval given for geotechnical works in proximity of the creek crossings. • Continued engagement regarding [REDACTED] any disturbance required for the construction of the NGI pipeline. • Discussed and confirmed avoidance of the sensitive area in proximity [REDACTED]. • Participation in Cultural heritage surveys, including gaining their acceptance of the outcomes and recommendations in the Survey reports. • Feedback from Darlot people via Grant Thornton is that it was the most productive heritage survey they have participated in. • Re-surveyed and moved water crossing to minimise impacts to the steep banks by crossing at a flatter section of the river. • Met with Darlot and offered an updated agreement that was well received. Awaiting confirmation from the group. They noted concerns with Section 18s being used for "future" activities as they have had issues with other projects (mining). APA confirmed that the s18 has been submitted for construction, and consultation would always be undertaken prior to any new works not already agreed (i.e. future offtakes/major repair work etc.) • Discussion about further involvement in the construction stage of the Proposal. APA is conducting local and Indigenous community engagement forums to present the opportunities that Nacap as the primary contractor has on the project, for both individuals and businesses. • APA and Darlot discussing logistics for heritage monitors ready for construction through Darlot country



Stakeholder	Date/s	Issues / Topics Raised	Outcomes
		<p>access outside of the CROW will be allowed during the construction stage. APA agreed that the sensitive area can be avoided by the project.</p> <ul style="list-style-type: none"> Provision of a relationship agreement. 	
Wajari Yamatji	09/06/2020 - ongoing	<ul style="list-style-type: none"> Discussion with representative bodies and formal engagement of preferred heritage specialist to undertake surveys. Formal notification of the pipeline licence application submitted to DMIRS. Discussed possible employment opportunities in pipeline construction and/or any monitoring of ground disturbance. APA advised that there will be a Local Indigenous Engagement policy for the project and every contractor that tenders for the work, will be expected to adhere to that policy. Participation in Cultural heritage surveys including gaining their acceptance of the outcomes and recommendations in the Survey reports Provision of a relationship agreement. 	<ul style="list-style-type: none"> Discussion about further involvement in the construction stage of the Proposal. APA is conducting local and Indigenous community engagement forums to present the opportunities that Nacap as the primary contractor has on the project, for both individuals and businesses. Wajari Yamatji and APA further discussed management of site and monitoring based on Heritage surveys. APA has agreed to implement the best outcome recommendations .i.e. reduce CROW width, which was then agreed to by the Traditional Owners. Requested a project fund for Cultural Heritage on ground works for their group, which APA has agreed to. APA met with the negotiation team in December who agreed terms with APA. APA attended the meeting with the negotiation team, along with the working group and applicants on 17 March, where the group endorsed the relationship agreement. Monitoring and onsite cultural heritage management was discussed. APA and Warraji Yamatji are discussing logistics for heritage monitors ready for construction through the Warraji Yamatji claim area.
Mullewa Wadjari (outside of Yamatji Nation land)	09/06/2020 - ongoing	<ul style="list-style-type: none"> Discussion with representative bodies and formal engagement of preferred heritage specialist to undertake surveys. Formal notification of the pipeline licence application submitted to DMIRS. Discussed possible employment opportunities in pipeline construction and/or any monitoring of ground disturbance. APA advised that there will be a Local Indigenous Engagement policy for the project and every contractor that tenders for the work, will be expected to adhere to that policy. Participation in cultural heritage surveys including gaining their acceptance of the outcomes and recommendations in the Survey reports Provision of a relationship agreement. 	<ul style="list-style-type: none"> Discussion about further involvement in the construction stage of the Proposal. APA is conducting local and Indigenous community engagement forums to present the opportunities that Nacap as the primary contractor has on the project, for both individuals and businesses. Engagement has been positive and no concerns have been raised to date. Mullewa Wadjari for the area outside of Yamatji Nation have finalised negotiations with APA have endorsed the Relationship agreement. APA and Mullewa Wadjari are discussing logistics for heritage monitors ready for construction through Mullewa Wadjari claim area.
Wutha	20/7/2020 – ongoing	<ul style="list-style-type: none"> Surveys organised with archaeologists and Traditional Owners for the ex Wutha claim area. Formal notification of the pipeline licence application submitted to DMIRS. Participation in cultural heritage surveys including gaining their acceptance of the outcomes and recommendations in the Survey reports Provision of a relationship agreement. 	<ul style="list-style-type: none"> APA have engaged the preferred consultant as nominated by the Wutha group. Despite Native Title having been determined not to exist based on the prior Wutha claim, APA has continued to offer Wutha a Relationship Agreement should they wish to enter into one. Wutha noted a preference for work on the project. APA is consulting with Wutha regarding employment opportunities which individuals of the group are particular keen on. As Nacap will be the primary contractor (engaging sub-contractors), APA has organised a meeting with Nacap and Wutha to facilitate the potential opportunities. APA has agreed to implement the best outcome recommendations .i.e. reduced CROW width, which was then agreed to by the Traditional Owners. Engagement has been positive and no concerns have been raised to date. APA and Wutha are discussing logistics for heritage monitors ready for construction through the claim area.



Stakeholder	Date/s	Issues / Topics Raised	Outcomes
Other Traditional Owners – members from neighbouring claims	21/10/2020 - ongoing	<ul style="list-style-type: none"> As Native Title is still to be determined from the Badimia Claim east to the end of the NGI pipeline, APA has been open to discussions with parties from neighbouring Native Title claims, should they wish to be part of the planned surveys being conducted. These members have been invited to attend the respective surveys. 	<ul style="list-style-type: none"> No concerns raised, everyone is support of employment opportunities. Discussions are ongoing, as required.
Indigenous Representative Bodies			
BLAC	30/09/2020 - ongoing	<ul style="list-style-type: none"> APA have discussed the Aboriginal heritage surveys with Patricia Edwards, who assists BLAC. Formal notification of the pipeline licence application submitted to DMIRS. 	<ul style="list-style-type: none"> Engagement has been positive and no concerns have been raised to date. Signed the Badimia relationship agreement.
YRSC	22/09/20 - ongoing	<ul style="list-style-type: none"> Formal notification of the pipeline licence application submitted to DMIRS. Ongoing consultation regarding the agreement for Yamatji Nation and management of Heritage sites. 	<ul style="list-style-type: none"> APA has been discussing with YSRC and agreed to utilise their new preferred heritage consultant. No concerns raised. Supportive of project and assisting with heritage management and finalising the Relationship agreement and Cultural Heritage Management Plan.
Darlot Heritage Working Group	02/09/2020 - ongoing	<ul style="list-style-type: none"> The Darlot Heritage Working Group have confirmed they are the appointed representatives for the Darlot people and requested that APA engage with them as the focal point for the NGI project. Formal engagement of Brad Goode Associates to support the heritage surveys alongside the Darlot people, as requested by the Working Group. 	<ul style="list-style-type: none"> Engagement has been positive As noted for Darlot above, although Darlot consented to the S18, they did raise concerns that it could be miss-used for future activities. APA has confirmed that the S18 applied for would only be utilised for the construction of the pipeline as already discussed with Darlot, and any changes or future work (if required) would be planned in consultation with Darlot at the time. The working group also reaffirmed its request to have monitors onsite during project works. APA confirmed that monitors would be engaged Notified of planned community opportunity forums being organised by APA and Nacap for employment and business opportunities on the project.
Goldfields Native Title Services (GNTS)	30/06/2020	<ul style="list-style-type: none"> Communication with GNTS to determine if there are any active claims intersecting the project and if GNTS98 requires notification prior to entry. 	<ul style="list-style-type: none"> GNTS confirmed they are no longer operational.
YMAC	23/09/2020 - ongoing	<ul style="list-style-type: none"> Discussion held with representative body and heritage surveys organised. Formal notification of the pipeline licence application submitted to DMIRS. Response received by the EPA on Additional Information on the EPA Referral Document as advertised for public comment, and clarification of working relationship between YMAC and respondent. 	<ul style="list-style-type: none"> Engagement has been positive and no concerns have been raised to date. APA have engaged the preferred consultant as nominated by YMAC. Continued consultation for Wajarri Yamatji relationship agreement, including coordination of the Wajarri meetings, and amendments to the Relationship agreement that has been finalised with the group. Notified of planned community opportunity forums being organised by APA and Nacap for employment and business opportunities on the project. YMAC was also involved in the final legal review of the Badimia relationship agreement (prior to signing).

2.4.2 Ongoing Consultation

The framework for ongoing consultation with the relevant traditional owners and other relevant stakeholders during the life of the NGI Pipeline Project (during both construction and handover phase and through the operational and maintenance phase) is based on the construction reporting framework in the NGI Stakeholder Engagement Strategy (20199- PL-LH-0002), and also by way of agreed annual (or more frequent where requested by relevant traditional owners or other relevant stakeholders) meetings.

APA has appointed a Heritage Advisor to act as the person responsible on a day to day basis, to ensure compliance in line with this CHMP, relationship agreements, and any other ongoing requests of suggestions of the Traditional Owners in the field, or other relevant stakeholders. This will provide a dedicated contact person for the Traditional Owner groups. Working alongside the APA Heritage Advisor, will be a standalone Nacap Heritage Advisor to ensure construction activities near the Registered Heritage sites and other noted areas will be monitored, and reported in accordance with the management conditions in this CHMP.

Daily work packs for each work crew will contain information about the actions with respect to Aboriginal Cultural Heritage within the CROW, including actions to engage relevant Aboriginal monitors, protect sites by fencing and flagging areas of heritage value and erecting signage as per the commitments in this CHMP. Information will also be included in inductions, tool boxes and prestart meetings, along with other training processes. The Contractors will report to APA on the assessment and implementation of the actions.

Affected stakeholders will be kept aware of scheduled activities and impacts as the Project progresses. Ongoing consultation will occur via email/letters, meetings, and circulation of updates to relevant stakeholders.

Consultation will include contacting relevant stakeholders at key milestones during implementation of the project including a minimum of 2 weeks prior notice of:

- Commencing construction activities for the project;
- Commencing works within each relevant area of interest in the project;
- Notification of mobilisation to site for works where heritage monitors will be engaged.
- Cessation of works within each relevant area of interest in the project; and
- Cessation of construction for the project.

In addition, ad hoc consultation will be undertaken as required to continually inform of the projects progress, on the discovery of any unexpected find to the relevant groups, and as required should any questions or concerns be raised from either party.

Figure 2 outlines the approach APA will implement for stakeholder engagement and communications throughout the Project. The specific approach for each stakeholder or stakeholder group will be tailored to their specific expectations and requests.

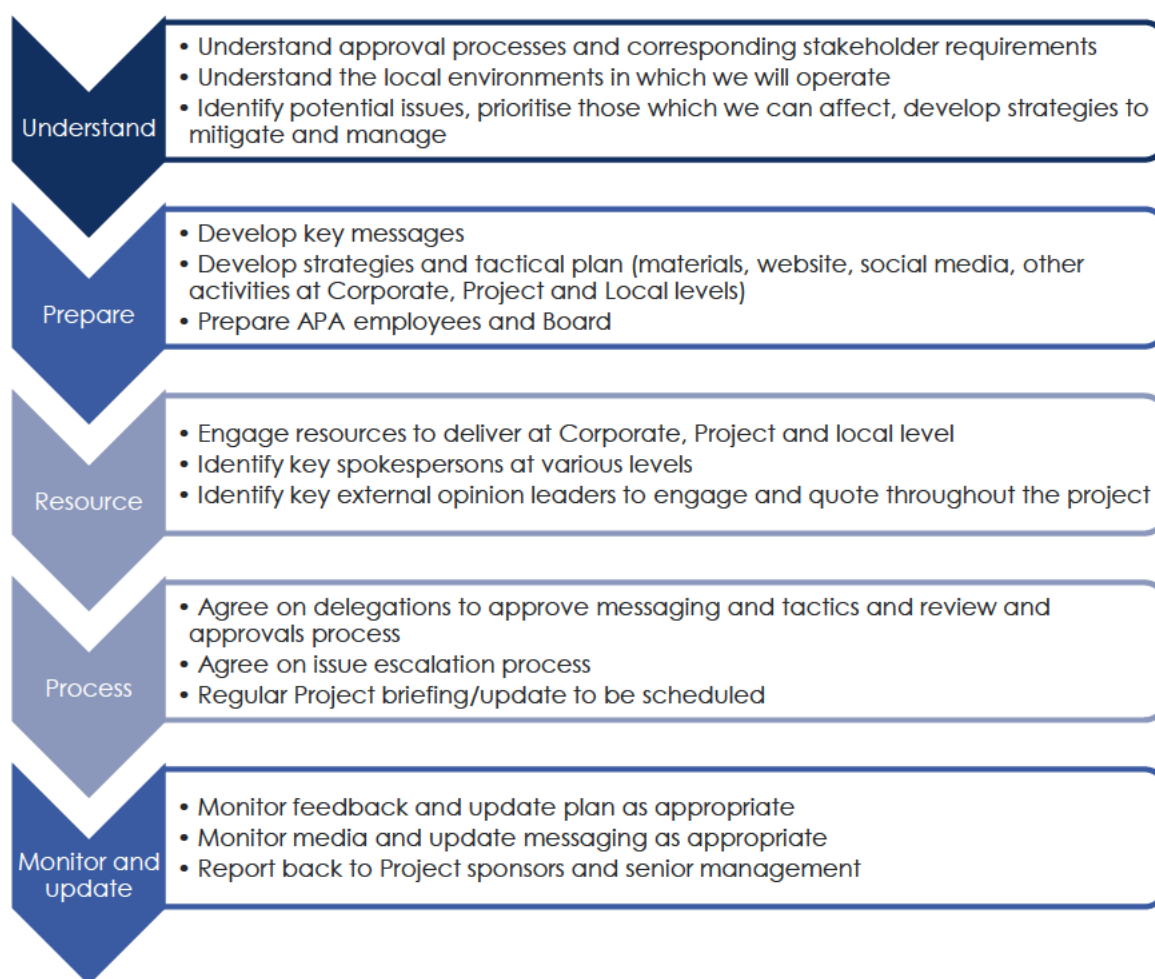


Figure 2: APA communication approach

APA will maintain a stakeholder management database for the life of the Project to retain information relevant to the planning, construction, commissioning and operation of the Project. It will include information gathered in the field from Records of Contact form, copies of correspondence, relevant discussion records and agreements for each landowner. The stakeholder management database, X-Info Connect (XIC), will also record enquiries, feedback and complaints raised and details of the relevant response resolution.

Additionally, feedback from all interested parties will be encouraged and monitored during the entire project. An email (NGIproject@apa.com.au) has been set up for the NGI project and all material relating to the project will reference this as the contact for feedback, complaints and queries. A register is maintained that records actions taken to address any issues/feedback received. Any third-party complaints will be addressed promptly, in accordance with APA Corporate procedures and the Stakeholder Engagement Plan (20199-PL-LH-0002). A complaints register will be maintained for the project. All complaints will be addressed, and corrective actions tracked to completion for any substantial complaints.

3. SUMMARY OF HERITAGE SURVEYS AND ABORIGINAL SITES RELEVANT TO THE PROJECT

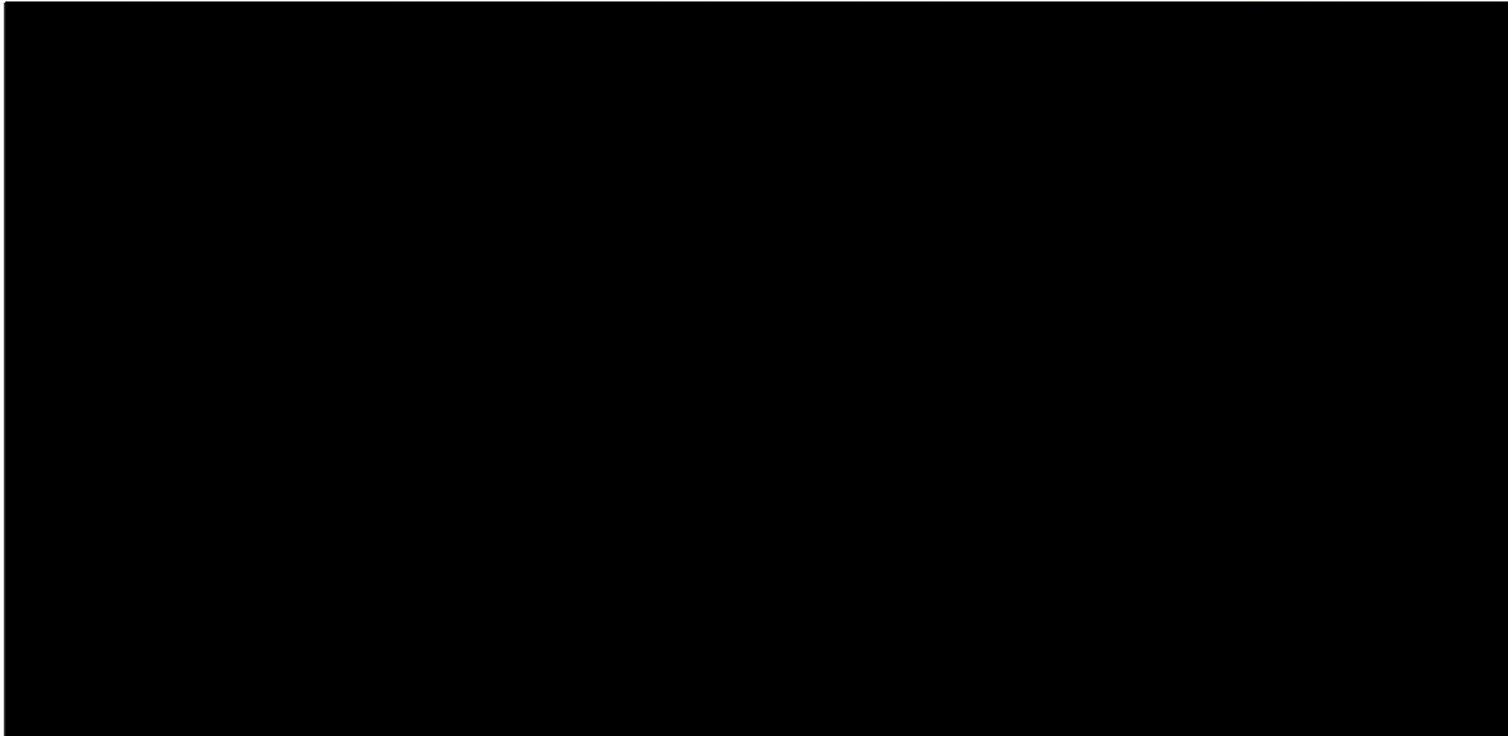
Eight Traditional Owner groupings have been identified who may have cultural ties to the land within the NGI project. These groupings and their respective Indigenous representative bodies are:

- Yamatji Nation (– managed or represented by Yamatji Southern Regional Corporation Limited (ACN 638 36 684) (YSRC);
- Mullewa Wadjari – managed or represented by Heritage Link (CAN 30 040 150 013);
- Wajarri Yamatji – managed or represented by Yamatji Marlpa Aboriginal Corporation (ICN 2001) (YMAC);
- Badimia – managed or represented by Badimia Land Aboriginal Corporation (ICN 3643);
- Badimaya Barna Guda (BBG) –the BBG native title claim was dismissed in 2021. This group has ties to the Badimia listed above, but is managed or represented in interactions with APA by a BBG representative;
- Wutha – the Wutha Native Title was dismissed in 2019, however they identify as the primary Traditional Owners and appropriate knowledge holders in respect of the land. This group is managed or represented in interactions with APA by a Wutha representative; and
- Darlot – a Traditional Owner Group with a current Native Title claim, managed or represented by Grant Thornton, Roe Legal and the Darlot Heritage Working Group.

APA commissioned a detailed heritage survey program for the Project, with the surveys commencing in December 2020. All surveys were conducted to archaeological and ethnographic site avoidance standards. All heritage places identified during the surveys were being assessed in consideration of whether they are likely to meet criteria for Aboriginal sites, as specified in section 5 of the AHA. These sites/places are also shown in **Figure 3: WNG-MAP-L-0058 - Aboriginal Heritage Values within the NGI Pipeline Area and Surrounds**. Where required, additional Site Identification surveys were undertaken to ensure the required information was available to enable approvals and appropriate management of the site.

Traditional Owner Groups and recognised knowledge-holders actively participated in the surveys and the provision of preliminary advice, while final site avoidance survey reports were prepared by the heritage consultants in consultation with the Traditional Owners and appropriate knowledge holders. The reports contained recommendations in relation to heritage monitoring during geotechnical investigations and ground-disturbing work and were used in the further detailed planning of the pipeline alignment.

NORTHERN GOLDFIELDS INTERCONNECT Cultural Heritage Management Plan



LOCATION DIAGRAM

APA Group does not guarantee the accuracy or completeness of the map and does not accept any liability for the use of the map. The map is confidential and its use is restricted to the project and is not to be used for any other purpose without the prior written consent of APA Group. © APA Group 2023.

APA Group
Phone: +61 8000 94115
Web: www.apa.com.au
Email: inquiries@apa.com.au

LEGEND:

- Kilometre Point (KP)
- NGI Pipeline Alignment
- Indicative Disturbance Footprint (IDF)
- Pipeline Licence Area
- Terra Rosa Heritage Sites (2021)
- Other Heritage Places
- Registered Heritage Sites

PROJECT: Northern Goldfields Interconnect (NGI)

TITLE: Aboriginal Heritage Values within the NGI Pipeline Area and Surrounds

SUBTITLE: Map 1 of 2 (of 4)

DATE: 14/09/2023

DATA SOURCE: Revision 6
PipeLines, KPIs, CROW, Licence Area: APA Group
Heritage Sites: DLPH 001

MDAS NUMBER: WAG-MAP-L-0058

DOCUMENT NUMBER: WAG-2373-MAP-LH-008

Rev	By	Description	Date
0.1	SP		14/09/23
0.2	AK		01/08/23
0.3	AK		04/08/23
0.4	AK		04/08/23

SCALE: 1:800,000 @ A3

ISSUED FOR USE

Document Path: \\PERDATA\Geospatial\WAG\GIS\Projects\WAG\sub\Northern Goldfields Interconnect\MDAs and Proj\WAG-MAP-L-0058 - CEP - Figure 4.9 - Aboriginal Heritage Values within the NGI Pipeline Area and Surrounds - A - INSETS - 20230914.mxd

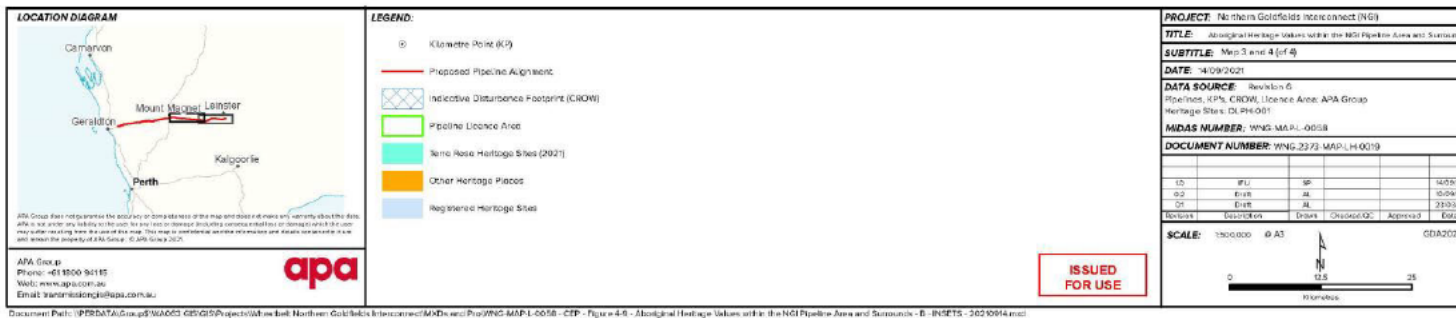
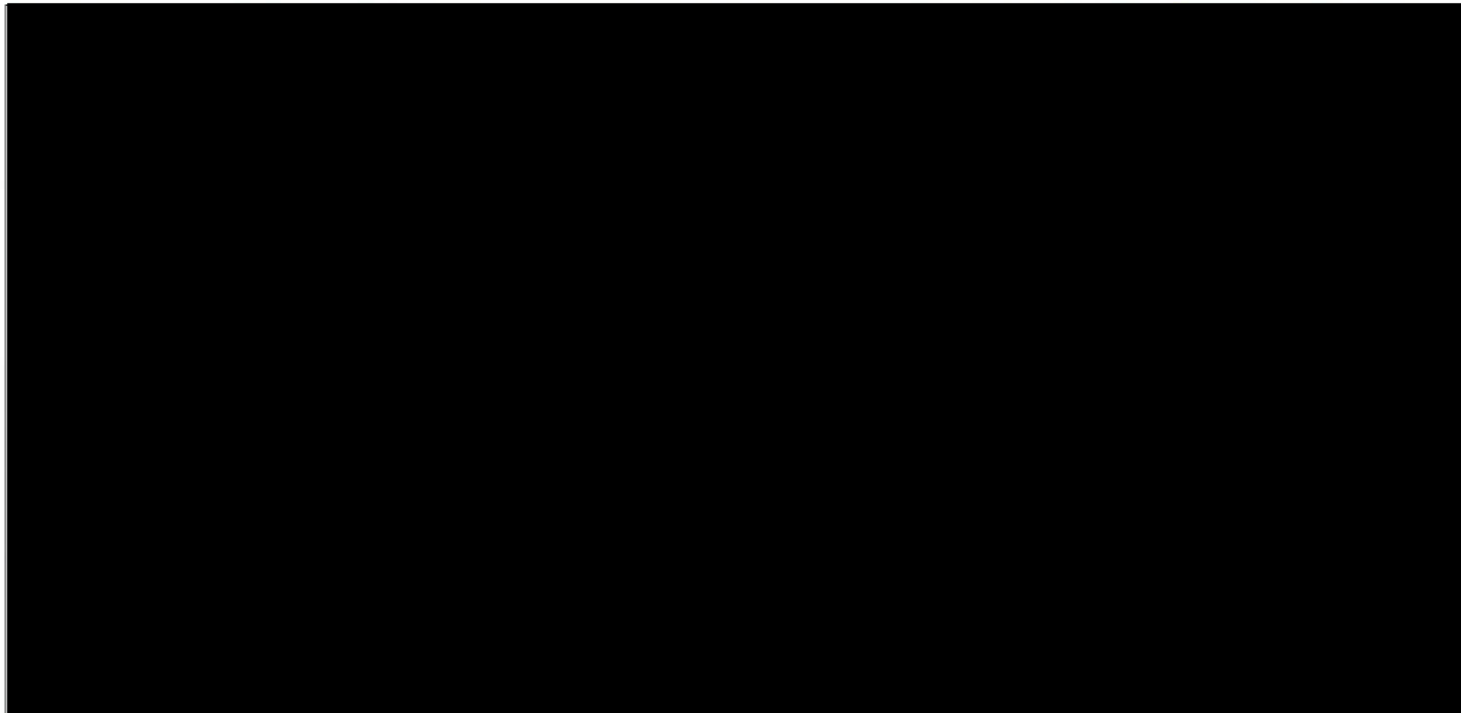


Figure 3: WNG-MAP-L-0058 - Aboriginal Heritage Values within the NGI Pipeline Area and Surrounds

Survey Participants

The ethnographic and archaeological surveys were carried out by survey teams that included an archaeologist and/or anthropologist and senior Aboriginal Elders with knowledge of the mythological landscape and with long historical associations to the area, and its heritage sites.

Surveys Results

The surveys confirmed the presence of a number of previously recorded Registered Sites and Other Heritage Places, as well as identifying a number of isolated artefacts and some new heritage sites. These areas were recorded using a GPS, and a detailed description of the sites was also recorded to allow for a significance assessment to be made. Accordingly, when Aboriginal sites were identified during the surveys, several supplementary areas were surveyed to allow for potential deviations of the proposed pipeline alignment.

Since January 2021, APA has been discussing the findings of the heritage surveys with the Traditional Owners Groups and appropriate knowledge holders to determine the potential impacts and how they can be avoided and/or mitigated and managed. The requirement for any specific management measures for the heritage sites was discussed, and was included in the site avoidance heritage survey reports.

Primarily APA has sought to avoid any direct impact to Aboriginal heritage values by adopting practical impact management measures, including but not limited to:

- Route alignment optimisation (which included avoidance of sites of known Aboriginal Heritage value, [REDACTED])
- The use of HDD construction methods to bore under areas where the alignment intersects areas of particular ethnographic sensitivity or certain sites that cannot be avoided [REDACTED]
- Exclusion Zone boundaries (identified with the Traditional Owners and appropriate knowledge holders that encompass and protect the ethnographic sites and places).
- Reduction in the width of the construction corridor being narrowed to 20 m in width for certain sites/places from the standard 30 m width to minimise disturbance to those sites/places.

The site specific impact mitigation measures are listed in **Table 3**.

Through consultative surveys and refinement, the number of heritage sites within the indicative Project area has been reduced from 36 to 11 sites. Of these 11 sites, not all are directly impacted, with only 4 of these sites being directly impacted by the project. Where direct impacts are unable to be avoided, APA has, where necessary seek Ministerial consent under section 18 of the AHA in relation to carrying out the proposed works in the area.

4. CULTURAL HERITAGE IMPACT ASSESSMENT

The objective of the cultural heritage impact assessment is to proactively identify potential impacts to known heritage places within the NGI pipeline corridor, as identified during the heritage surveys. Through identifying potential impacts, strategies to minimise or remove these impacts can be developed for both the construction phase and the operating life of the Project.

These risk-based strategies and management actions which have been identified will be implemented in accordance with **Table 3** below.

A draft version of this Cultural Heritage Management Plan for the Northern Goldfields Interconnect Pipeline was prepared and has been reviewed and updated by APA in consultation with the respective representatives for the Traditional Owner Groups. The review process was aimed at ensuring that all relevant parties are satisfied with the assessment and presentation of risk to known heritage places, that they agree with the proposed management strategies and actions, and that these are in accordance with existing agreements, if any.

The outcomes of the consultative risk assessment process that was conducted for each site identified during the heritage surveys are presented in **Table 3**. It presents the potential impact on the identified heritage sites and details the agreed management measures that will be implemented to avoid or mitigate the impact. In addition to the site specific measures in **Table 3** below, all APA employees and contractors working on the construction of the NGI pipeline will be informed of the location of the heritage sites (as appropriate), and the requirement that they restrict site access and activities to only the portion of the site that has internal construction approval. Specifically, APA will:

- Ensure all APA employees and contractors working on the construction of the NGIP are informed of the location of the site, and the requirement that they restrict site access and activities to only the portion of the site that has construction approval
- Ensure cultural awareness notification sessions for all Project personnel are conducted at least once per month
- Ensure induction training for all relevant employees and contractors on cultural heritage management, so that they are made fully aware of their obligations in this Cultural Heritage Management Plan, and under the Aboriginal Heritage Act 1972, as amended from time to time
- Offer to engage a monitoring team from the relevant representative group prior to or during ground disturbance works i.e. vegetation and topsoil removal occurring within the heritage place of the associated group. Should a Traditional Owner group chose not to attend for any portion of the pipeline, the project will continue with additional internal awareness and monitoring.
- Undertake regular consultation with the Aboriginal representative groups throughout the construction period.
- Undertake at least annual consultation with the Aboriginal representative groups after the construction activities.
- Promote appropriate business and work opportunities for Aboriginal Representative Groups through the construction contractor NACAP

[Redacted text block]

- [Redacted list item]
- [Redacted list item]
- [Redacted list item]
- [Redacted list item]

[Redacted text block]

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Table 3: Cultural Heritage Impact Assessment

Section(s)	KP	Site Code	Status	Site Type	Site Summary	Potential Impact(s)	Management Strategy
Yamatji Nation KP 0 – 139.4 and 140.7 KP 209							
Southern Yamatji KP 0 – KP 139 (approximately)							
Southern Yamatji	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Southern Yamatji	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Southern Yamatji	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Southern Yamatji	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Section(s)	KP	Site Code	Status	Site Type	Site Summary	Potential Impact(s)	Management Strategy
	[REDACTED]	[REDACTED]			[REDACTED]	[REDACTED]	[REDACTED]
Southern Yamatji	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Section(s)	KP	Site Code	Status	Site Type	Site Summary	Potential Impact(s)	Management Strategy
			[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
Southern Yamatji	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Southern Yamatji	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Section(s)	KP	Site Code	Status	Site Type	Site Summary	Potential Impact(s)	Management Strategy
Wajarri Yamatji KP 139 – KP 140.5 (approximately)							
Southern Yamatji, Mullewa Wadjari, Wajarri Yamatji	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Mullewa Wadjari, Wajarri Yamatji	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Section(s)	KP	Site Code	Status	Site Type	Site Summary	Potential Impact(s)	Management Strategy
					[REDACTED]		
Mullewa Wadjari, Wajarri Yamatji	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Widi Mob KP 160.5 – KP 208.3 (approximately)							
Widi Mob	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Widi mob	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Widi mob	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Section(s)	KP	Site Code	Status	Site Type	Site Summary	Potential Impact(s)	Management Strategy
				[REDACTED]	[REDACTED]		[REDACTED]
Widi mob	[REDACTED]			[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Badimia People KP 208.3 – KP 368 (approximately)							
Badimia	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Badimia	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Badimia	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Section(s)	KP	Site Code	Status	Site Type	Site Summary	Potential Impact(s)	Management Strategy
					[REDACTED]		
Badimia	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Badimia	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Badimia	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Badimia	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Section(s)	KP	Site Code	Status	Site Type	Site Summary	Potential Impact(s)	Management Strategy
Badimia	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Badimia	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Badimia	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Badimia	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Badimia	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Badimia	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Section(s)	KP	Site Code	Status	Site Type	Site Summary	Potential Impact(s)	Management Strategy
Badimia	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Badimia	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Wutha KP 368 – KP 524 (approximately)							
Wutha	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Wutha	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Section(s)	KP	Site Code	Status	Site Type	Site Summary	Potential Impact(s)	Management Strategy
Darlot							
Darlot							

5. IMPLEMENTATION PROCESS

5.1 Protection of Identified Aboriginal sites

Under section 17 of the AHA it is an offence to excavate, destroy, damage, conceal or in any way alter any Indigenous site.

Known Indigenous sites will be protected and managed using the following measures:

- Aboriginal sites are identified through ethnographic and archaeological surveys
- The Department of Planning Lands and Heritage (DPLH) is informed of identified sites for inclusions in the Register of Aboriginal Sites.
- All sites located within the Project Area are documented, including accurate mapping of their boundaries and extents, and records are maintained securely.
- The coordinates of all sites affected by the Project are included within the GIS database of the Project Area.
- Information on sites of cultural significance is provided as part of the general induction.
- Detailed maps of each area showing all known sites will be available on site for perusal by ground personnel.
- Known Aboriginal sites are considered during planning. The Project will avoid sites in accordance with the avoidance measures agreed with Traditional Owner groups, as reflected in the CROW.
- Ongoing consultation will be maintained with affected Traditional Owner groups as specified in the respective Relationship Agreements.
- If an Indigenous site must be disturbed, approval is sought from the WA Minister for Aboriginal Affairs via a section 18 application (s18), if necessary. Work cannot commence until approval is received from the Minister.
- Work that has to occur near a site will be undertaken in the presence of Traditional Owner monitors who will assist in the avoidance of potential damage to sites.

5.2 Protection of New Indigenous Sites

The AHA provides protection for all Aboriginal sites whether or not they are recorded on the Register of Aboriginal sites.

APA is committed to minimise the risk of damaging previously unknown sites as specified below. :

5.2.1 Indigenous Skeletal / Ancestral Remains

There is the potential for the discovery of indigenous skeletal and ancestral remains, including burial grounds when earth moving and construction activities take place. Skeletal/ancestral remains are of great significance to Indigenous people, who feel strongly about the removal of remains from gravesites. If burial site or human remains are found during ground disturbing activities the following actions will be taken:

- Ground disturbing activity in the area will be stopped immediately. The site will be barricaded to prevent further inadvertent access or disturbance.
- The contractor can continue with works a minimum of 25m away from the potential discovery, after consultation with relevant Traditional Owners.

- The WA Police and the Registrar of Aboriginal sites will be notified immediately, and before any mitigation or management actions in relation to the remains are undertaken.
- Detailed photographs of the remains will be taken without further disturbing the site to help with identification. Documenting all visible facets of the skull and the pelvis is especially useful. Photographs will also be taken of the general area to document the position of the remains and any cultural material present at the site.
- The location of the remains will be recorded in the GIS database of the Project.
- The police will investigate the site as soon as possible.
- Upon notification that the remains are of Aboriginal origin and not a matter for further police involvement, the Registrar of Aboriginal sites will seek immediate involvement of the relevant Traditional Owners. If it is necessary to disturb the remains for the purpose of identification this will be undertaken by a qualified archaeologist or forensic specialist.
- APA, in conjunction with relevant Traditional Owners, will agree on an appropriate action plan for the management of the remains. The following options will be discussed and considered during the development of the action plan:
 - Leave the remains in situ if they have not been disturbed or disturbance has been minimal.
 - Rebury in the same place if the burial has only been partially disturbed and activity at the site can be halted permanently.
 - Rebury as close as possible to the location at which the remains were found where the risk of future disturbance is minimised.
 - Rebury in a gazetted cemetery or keeping place if disturbance in the area is unavoidable.
- The Registrar will ensure that the burial place is recorded and placed on the Register of Aboriginal sites.
- The Registrar will ensure that the burial place is reported to the relevant Commonwealth Minister, in accordance with the requirements under the *Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)*.

If disturbance of the remains by construction activity cannot be avoided and a section 18 consent is not in place, one may need to be obtained prior to further disturbing work being undertaken. Any such section 18 application will be prepared by a suitably qualified or experience consultant.

5.2.2 Previously Unidentified Aboriginal Sites

While not anticipated, given that detailed heritage surveys have already been undertaken for the Project, if a previously unidentified Aboriginal site is found (i.e. artefacts are uncovered) the following actions will be taken:

- Disturbance activities will cease immediately in the event of finding Aboriginal artefacts/objects that were not identified during the Aboriginal heritage surveys. An exclusion zone of 25m will be established and the site barricaded to prevent further inadvertent access or disturbance. The Site Environmental Advisor will be notified immediately. DPLH and the Traditional Owners (including YSRC if on Yamatji Nation land) will also be notified within ten (10) days of discovery, prior to implementing mitigation actions required.

- The contractor can commence works a minimum of 25m away from the potential discovery, after consultation with relevant Traditional Owners people
- A heritage survey will be conducted by a suitably qualified consultant and relevant Traditional Owners
- If the heritage survey determines that the area is not an Aboriginal site, work will recommence.
- If the heritage survey determines that area is an Aboriginal site as per the AHA, a report will be prepared and submitted to DPLH. The report will be prepared in accordance with the relevant template on the DPLH website.
- The registrar will ensure that the site is recorded and placed on the Register of Aboriginal sites.
- If APA wishes to carry on activity in the area, consultation will be conducted with the Traditional Owners of the site and with DPLH where necessary. If the site cannot be avoided and the Traditional Owners (if applicable) and DPLH consider it to be an Aboriginal site, a section 18 application may need to be lodged with the ACMC. Any such section 18 application will be prepared by a suitably qualified consultant with relevant experience.

When appropriate APA will prepare a specific CHMP for the site. The site specific plan will be developed in accordance with DPLH's requirements and consultations with the relevant Traditional Owners. The following information will be included in the site specific CHMP:

- current use of site
- prospective use of site
- presentation of site
- what is significant about the site
- strategies for maintenance, protection and monitoring
- current threats and how these could be solved
- potential threats and how these could be prevented
- cause of the threat and how the cause can be eliminated
- funding avenues
- management of the site
- arrangement for performance monitoring and reporting.

5.3 Reporting of Disturbance to an Indigenous Site

Under the AHA, an Aboriginal site is disturbed contrary to section 17 when it is excavated, destroyed, damaged, concealed or in any way altered without prior authorisation of the Registrar of Aboriginal Sites (under section 16) and/or consent from the WA Minister for Aboriginal Affairs (under section 18). The AHA protects places and objects that may be of importance or significance to people of Aboriginal descent in Western Australia. These places and objects may be identified as a site and recorded in the Register of Aboriginal sites. All aboriginal sites are protected under the AHA whether or not they are recorded on the Register. Under section 17 it is an offence to disturb an Aboriginal site without having section 16 authorisation or a section 18 consent.

In the highly unlikely event that there is an alleged disturbance of an Aboriginal site associated with APA operations, (and where there is no section 16 authorisation or a section 18 consent in place), APA will take the following measures:

- Ground disturbing activity in the area will be stopped immediately. The site will be barricaded off to prevent further inadvertent access or disturbance.
- An incident report will be prepared in consultation with the person who reported the disturbance.
- DPLH will be contacted as soon as possible to notify them of the alleged disturbance.
- A thorough internal investigation will be carried out.

All incidents will be reported in accordance with the APA HSE-GP-07.01 Incident Reporting Procedure in **Section 6.7** of this CHMP. An initial notification shall be submitted via email before the end of the day on which the incident occurred. All incidents shall then be recorded on an Incident Reporting and Investigation Form and provided to the Project Manager within 24 hours of the incident and will be tracked through to completion of any required corrective actions.

6. IMPLEMENTATION AND MANAGEMENT

APA will implement the management measures described in this section to give effect to the commitments of this CHMP.

6.1 Demarcation of Heritage Places

Heritage places may require physical demarcation in some cases to ensure their location is made known to APA staff and contractors working on the NGI CROW. Demarcation may take the form of heritage flagging, or the installation of fencing around the perimeter of a heritage place.

Heritage flagging involves the tying of pink and black striped heritage flagging tape around features such as bushes and trees to alert land users to a site boundary, and is typically undertaken by the heritage survey team during site recording.

Heritage fencing will be installed where requested by the Traditional Owners, as a means of providing additional visual and physical restriction to a heritage place. For minimum impact to the fabric of a heritage place, star pickets should be installed just outside a defined heritage place boundary. Installing fencing within a heritage place may require approval under Regulation 10 of the Aboriginal Heritage Regulations (1974) (WA).

6.2 Cultural Heritage Monitors

APA will engage cultural heritage monitors from the relevant Traditional Owner Groups during the construction phase of the Project. Where required the monitoring teams will assist the construction teams in undertaking a preliminary identification of any previously unknown heritage materials, if unearthed and will ensure that any isolated heritage materials can be immediately salvaged or relocated.

Should a Traditional Owner group chose not to attend for any portion of the pipeline, the project will continue with additional internal awareness and monitoring.

6.3 Salvage and Relocation of Cultural Material

In sections of the CROW where heritage places cannot be avoided by APA's proposed works, and that have been approved for disturbance, the salvage of heritage materials / objects will be undertaken before ground disturbing activities commence to mitigate the impact of the works. This involves the removal and relocation of cultural heritage objects at the direction and discretion of the relevant Traditional Owners for the area, and/or their representatives.

Only cultural materials that will be directly impacted by the construction and ancillary works should be considered for salvage, with all other heritage objects remaining in situ wherever possible. Salvage of cultural materials from known heritage sites will only be undertaken after first obtaining any necessary statutory consent from the DPLH and Minister for Aboriginal Affairs.

APA must facilitate the salvage of heritage materials, which may include the involvement of Traditional Owner monitors, and / or a salvage team comprising Traditional Owner representatives and suitably qualified heritage consultants.

The Traditional Owners who have custodianship over the salvaged materials will identify and relocated the materials to a suitable storage location.

6.4 Index of Sites and Management Prescriptions

Where previously unknown or unrecorded sites are found in the course of construction, the details of the site, object or artefact and immediate measures taken to safeguard the find will be recorded in APA's New Discovery form (**Appendix A**). APA will maintain a register of new finds and the management measures associated with each. Actions associated with the management of the find will be recorded in the APA compliance management system, Safeguard+ and the management requirements will be communicated to relevant Project personnel.

6.5 Recommendations from Cultural Heritage Surveys

Recommendations from the Aboriginal heritage surveys have been considered by APA in consultation with Traditional Owner Groups, and have, within constructability constraints, been implemented during Project design.

Aboriginal heritage surveys of the NGI pipeline area were undertaken by Terra Rosa Consulting, Horizon Heritage Management and Brad Goode & Associates. The objective for the surveys was to identify and record all archaeological sites within the construction corridor. For any sites recorded, an assessment of whether it is potentially an Aboriginal site, as defined by section 5 of the AHA, was also undertaken.

The surveys confirmed the presence of a number of previously recorded Registered Sites and Other Heritage Places, as well as identifying a number of isolated artefacts and some new potential heritage sites. These areas were recorded using a GPS, and a detailed description of the sites was also recorded to allow for a significance assessment to be made. Accordingly, when Aboriginal sites were identified during the surveys, several supplementary areas were surveyed to allow for potential deviations of the proposed pipeline alignment. All heritage places identified during the surveys were assessed in consideration of whether they are likely to meet the criteria for Aboriginal sites, as specified in section 5 of the AHA. APA is committed to the protection wherever possible, of all heritage places identified during the surveys, regardless of whether they are formally accorded Aboriginal Site status under the AHA.

6.6 Compliance management

The compliance management activities detailed in this section are aimed at managing APA's compliance with:

- the statutory obligations relevant to the management of cultural heritage for the Project;
- the management strategies detailed in the Cultural Heritage Impact Assessment;
- the commitments made in this CHMP; and
- the commitments made in the individual Relationship Agreements.

The described compliance management activities align with the requirements of the Project Construction Environment Plan (CEP) and will be performed as part of the

processes implemented under the CEP. The classes of compliance activities comprise compliance monitoring, auditing, and incident/non-conformance management.

Cultural heritage inspection and audits will be guided by compliance checklists that are appropriate to the Project area where work is performed. The checklists will allow for compliance checks with the following range of management measures:

- Employee CHMP induction;
- The engagement of monitoring teams where required;
- Construction methodology requirements ,including:
 - CROW width specifications;
 - Demarcation and fencing requirements; and
 - Avoidance of sites

6.6.1 Compliance Monitoring

Daily Workplace Inspections

The construction contractor (typically the contractor HSE Advisor and/or workplace supervisors) will conduct daily Health, Safety, Environment (HSE) and cultural heritage inspections at the workplaces and sites under its control.

Weekly inspections

NGI construction areas will be inspected weekly by APA personnel (typically the APA Cultural Heritage Advisor) which will include conformance with the requirements of this CHMP. The inspection will address matters such as demarcation and protection of heritage areas, reinstatement of disturbed areas, the engagement of heritage monitors and the recording of heritage finds. Incident and non-conformance management

Cultural heritage incidents and non-conformances with the requirements of this CHMP, as identified from inspections, audits, and ad-hoc observations, will be recorded in the corporate APA incident database, maintained as part of the APA Safeguards Health, Safety, Environment and Quality Management System (HSEQ-MS). The database is an online system, accessible via the APA intranet.

In accordance with APA's Incident Reporting (APA HSE GP 07.01) and Incident Investigation and Analysis (APA HSE GP 07.02) procedures, the immediate and root causes of each incident non-conformance will be investigated by project personnel in consultation with the APA HSE Advisor, and corrective actions determined and assigned to a responsible position. Timeframes for corrective actions will be commensurate with the risk associated with the non-conformance.

Non-conformances entailing high risks, and their determined causes and corrective actions, or overdue actions will be subject to review by the APA Project Manager, in consultation with APA environmental staff and in accordance with the contract.

Any incident involving the unauthorised disturbance of a heritage site will be reported to DPLH as soon as APA is made aware of the disturbance. The EPA would also be notified as soon as practicable.

6.6.2 Internal project audits

As specified in the CEP, the environmental and heritage performance of the Project will be subject to an internal audit every quarter. The internal audits will be performed in accordance with APA's internal audit procedure and will aim to assess implementation and effectiveness of the cultural heritage management controls used on the project. As such, at least two audits will comprise a review of all processes supporting cultural heritage management, including:

- Cultural heritage induction material and records
- Records of internal and external communication relating to cultural heritage management, including communication with Traditional Owner Groups and regulators
- Incident and non-conformance management
- The maintenance of cultural heritage management records, including records of heritage finds, surveys, heritage monitor activity and recommendations.

APA intends that internal audits will:

- Assess whether all significant cultural heritage management aspects of the project are adequately addressed, in accordance with the requirements of this CHMP
- Assess whether management strategies are effective in achieving compliance with legal, stakeholder and corporate cultural heritage management commitments
- Identify substantial or recurring non-conformances with the requirements of this CHMP and associated obligations
- Determine and document the extent to which the objectives of the CHMP are being met.

Audit reports will categorise findings as either major or minor non-conformances, observations or opportunities for improvement and recommend changes to management strategies where they are considered necessary.

CHMP audits will be carried out by independent, qualified, and experienced APA staff, and/or consultants, and may be carried out in conjunction with HSE audits.

6.6.3 Analysis and Review

APA, through its Contractors, will implement the commitments and Management strategies as set out in **Section 4** and **Table 3** of this CHMP, and will assess and report weekly (internally) of the results of any heritage interactions, including Traditional Owner monitoring.

The APA Project Manager, with support from the Cultural Heritage Advisor will analyse and review the cultural heritage management performance of the Project against criteria outlined in **Table 4**, to verify compliance, and measure the effectiveness of management and mitigation of the controls in **Table 3** on a quarterly basis.

The review will consider as inputs incident, near miss and non-conformance reporting data, weekly inspection issue trends, the findings and recommendations from audit reports, and advice from appropriate construction contractor and APA HSE staff.

Any failure to implement the commitments and management strategies, will be considered an incident, which will be required to go through the standard APA incident processes (outlined in **Section 6.6.1**). As part of the investigation process APA will complete the APA Incident Investigation and Analysis Report Form (refer to **Appendix I**), to determine the cause of the management targets not being met. Any issues will be relayed to the Project Manager on an ongoing basis so that relevant improvements can be made, and tracked with corrective actions.

The relevant outcomes will be included in the internal quarterly report, and will contribute to the annual report, including performance against management objectives and targets, trends, achievement (or otherwise) of mitigation measures proposed or implemented changes to ensure the desired outcomes are achieved.

If there is any non-achievement of any of the management targets under this CHMP, it must be reported in writing to the CEO of the EPA within 21 days of its identification, in accordance with the EPA conditions for this CHMP.

Improvements will be developed in consultation with affected project staff and Traditional Owner representatives, if required, and may include changes to inductions, additional training or awareness programs, changes to work procedures, or improvements to resources or facilities.



Table 4: NGI Project Objectives, Standards and Measurement Criteria for Cultural Heritage Management aspects

Performance Objectives	Performance Standards	Measurement Criteria
<p>Unexpected finds will be managed in accordance with this CHMP and legislative requirements.</p>	<p>Relationship agreements in place with Native Title and Traditional Owner representatives prior to commencement of construction in their respective areas</p> <p>Management of cultural heritage value in accordance with the APA Aboriginal Cultural Heritage Procedure (APA HSE EP 13.07.02), and controls, including:</p> <ul style="list-style-type: none"> • Works cease immediately in the event of finding Aboriginal artefacts/objects that constitute a Site under the <i>Aboriginal Heritage Act 1972</i>, that were not identified during the Aboriginal heritage surveys. An exclusion zone of 20 m will be established and the Site Heritage Advisor and DPLH notified. DPLH and the Traditional owners will be consulted and advise further management; • If an Aboriginal heritage site is located during any phase of the work, the APA representative is to be notified and the necessary steps taken to protect the potential site until it can be checked and evaluated by the relevant native title representative 	<p>As-built surveys verify no unauthorised disturbance to registered heritage sites, artefacts or their exclusion zones.</p> <p>Pre-mobilisation checklist covers any necessary approvals (section 18) for registered heritage sites, engagement procedures with relevant Native Title and Traditional Owner groups, Issued for Construction (IFC) drawings showing construction boundaries and no-go areas</p> <p>Inspection/audit reports verify that contractor maintains and complies with a process of identifying and updating applicable legal requirements for Aboriginal and historic heritage</p> <p>Inspection/audit reports verify compliance with APA Aboriginal Cultural Heritage Procedure (APA HSE EP 13.07.02)</p>
<p>Implement Cultural Heritage Training to all personnel</p>	<p>All personnel are required to have attended and completed an Induction which includes Cultural Heritage</p> <p>Cultural awareness notifications will be provided to all personnel on site at least once per month during the construction of the Project</p>	<p>Induction records demonstrate all onsite personnel and contractors have completed site inductions (which includes Aboriginal heritage values and requirements and location of heritage survey areas) prior to commencing work on the project.</p> <p>Monthly contractor reporting verifies Cultural Heritage Awareness notifications were discussed at Toolbox meetings at least once within the month.</p>



Performance Objectives	Performance Standards	Measurement Criteria
<p>Traditional Owners are engaged for Monitoring</p>	<p>Cultural Monitors to be engaged, should they chose to be, to monitor ground disturbing works i.e. vegetation and topsoil removal to mitigate any possible deleterious effects from ground disturbance activities</p> <p>Adequate notification given to Traditional Owners for attendance at site for monitoring of works (at least two weeks' notice prior to works)</p> <p>Consultation with Traditional Owners representatives will be undertaken two week in advance of works occur within Aboriginal heritage sites.</p> <p>Compliance with Traditional Owner's commitments and management strategies as per Section 4 and Table 3</p>	<p>Contractor reporting verifies (daily / weekly) confirms Traditional Owner monitoring, or the implementation of additional actions being in place should traditional owners chose not to attend.</p> <p>Communication records verify consultation with Traditional Owners at least two weeks prior to works</p> <p>Communication records verify consultation with Traditional Owners Representatives at least two weeks prior to works within a heritage site.</p> <p>Contractor reporting verifies (daily / weekly) and quarterly audits confirm the implementation of the commitments and management strategies as per Section 4 and Table 3.</p>
<p>Zero unauthorised disturbance to heritage areas or artefacts as a result of construction activities</p>	<p>Registered Aboriginal cultural heritage sites shall be avoided when conducting activities unless otherwise authorised</p> <p>Management of cultural heritage value in accordance with the APA Aboriginal Cultural Heritage Procedure (APA HSE EP 13.07.02), and controls described in the CEP, including:</p> <ul style="list-style-type: none"> • Any registered Aboriginal cultural heritage sites shall be avoided when conducting activities unless otherwise authorised; • Construction boundaries clearly delineated to prevent encroachment of works on heritage sites or associated exclusion zones, including flagging and/or fencing, on advice from heritage stakeholders; exclusion measures checked and 	<p>Internal HSE / Compliance Audits, Site inspection records, CROW patrols and site inspection reports verify no disturbance beyond approved site boundaries</p> <p>Incident/corrective action registers, and complaints registers verify no unauthorised disturbance to heritage sites or their exclusion zones</p> <p>Record of Contractor Traffic Management Plan, including existing road network and private access track to be utilised wherever practicable</p> <p>Installation and maintenance of physical barriers (e.g. temporary fencing) or flagging to delineate Aboriginal heritage sites within close proximity to the CROW</p>



Performance Objectives	Performance Standards	Measurement Criteria
	<p>maintained for duration of works in each area (in accordance with Table 3);</p> <ul style="list-style-type: none"> • All employees and contractors working within the NGI pipeline licence area will be notified to restrict access and works to areas that have been subject to heritage survey and that are 'clear' for works to proceed, and to avoid impact to all heritage places in the area; and • Physical barriers (e.g. temporary fencing) or flagging will be used to delineate the Aboriginal heritage sites in close proximity to construction works; • Establishment of clearly delineated access points to prevent unauthorised disturbance and access to/along the CROW; and • Aboriginal cultural heritage avoidance area shall not be entered unless authorised to do so. 	
<p>Post Impact Monitoring undertaken in consultation with Traditional Owners.</p>	<p>Post monitoring of heritage areas are completed where required in accordance with Table 3.</p>	<p>Water flow at the sites identified in Table 3 will be monitored on two occasions post construction with the Traditional Owners to ensure there is no impacts to water flow attributable to the project.</p> <p>Should any impacts be identified, an incident will be recorded and appropriate corrective actions agreed with the Traditional owners will be implemented. Additional monitoring events will be undertaken as required until any impacts are adequately addressed.</p>

6.7 Reporting

External reporting on the management of cultural heritage for the Project involves routine reporting to the Department of Mines, Industry Regulation and Safety (DMIRS) and non-routine reporting to DPLH and EPA in the event of heritage finds.

6.7.1 DMIRS Reporting

As specified in the Project CEP, APA is required to submit immediate (within 2 hours) reportable incident reports, monthly recordable incident reports and will also compile a single compliance report to DMIRS within three months of completion of the Project.

Reportable incident reporting is required for any 'Unauthorised disturbance to heritage artefacts' whereby heritage values have been identified through site surveys and/or during monitoring of clearing works and the significance of the disturbance has been defined by an appropriately qualified person as having a significant consequence or above (with reference to the APA risk assessment matrix). A written incident report is also required to be submitted within three days of the incident occurring, providing additional incident details.

Recordable Incident reporting is required monthly for any non-compliance with an Environmental Performance Objective. In relation to heritage, the objectives include: "No unauthorised disturbance to Aboriginal heritage areas, artefacts or their exclusion zones" and "No unauthorised disturbance of historic heritage sites". Recordable incidents are reported by calendar month not later than 15 days following the end of the reporting period (i.e. previous month).

Compliance reporting is required at least annually, and APA has proposed a single compliance report to DMIRS within three months of completion of the Project. The report will include:

- A statement on compliance with the objective(s) of the CEP in relation to the management of cultural heritage, namely to have "No unauthorised disturbance to Aboriginal heritage areas, artefacts or their exclusion zones".
- Internal environmental audit report which includes details on any cultural heritage management non-conformances identified and corrective actions taken;
- Summary of cultural heritage incidents as recorded in the APA incident database;
- Details of ongoing consultation with Traditional Owner Groups.

6.7.2 DPLH Reporting

Under this CHMP reporting to the DPLH is required in instances where:

- Skeletal and ancestral remains, including burial grounds, are found during ground disturbing (excavation) activities. In these cases the Police and the Registrar of Aboriginal sites will be notified as soon as practicable, but within ten (10) days of discovery, and before any mitigation or management actions in relation to the remains are undertaken (**Section 5.2.1** of this CHMP)
- Previously unidentified Aboriginal sites are found during construction, as discussed in **Section 5.2.2** of this CHMP.
- Unauthorised disturbance of any Aboriginal site by being excavated, destroyed, damaged, concealed or in any way altered without the prior authorisation of the

Registrar of Aboriginal Sites and/or consent from the WA Minister for Aboriginal Affairs (**Section 5.3** of this CHMP).

6.7.3 EPA Compliance Assessment Report

Within 15 months from issuance of the Ministerial Statement, and then annually from the date of submission, APA will submit a Compliance Assessment Report to the EPA that will include:

- An assessment of the extent to which the management actions specified in the cultural heritage impact assessment have been successfully implemented during the construction phase of the Project
- An assessment of the extent to which the management actions were effective in achieving the objectives of this CHMP against management targets in **Table 3**
- Any unforeseen Aboriginal cultural heritage artefact/scatter finds during the construction of the NGI Project

APA will also consult with the relevant Aboriginal Traditional Owner Group or representatives affected by any non-achievement of management target, and will provide the Traditional Owners with a copy of the written report.

7. DEFINITIONS

The following definitions are relevant to this CHMP

Term	Meaning
Cultural Heritage Monitor	A representative of the relevant traditional owner group for an area of the pipeline appointed to undertake monitoring of Ground Disturbing Activities
Free and Prior Informed Consent	<p>Free refers to a consent given voluntarily and without coercion, intimidation or manipulation. It also refers to a process that is self-directed by the community from whom consent is being sought, unencumbered by coercion, expectations or timelines that are externally imposed.</p> <p>Prior means that consent is sought sufficiently in advance of any authorization or commencement of activities, at the early stages of a development or investment plan, and not only when the need arises to obtain approval from the community.</p> <p>Informed refers mainly to the nature of the engagement and type of information that should be provided prior to seeking consent and also as part of the ongoing consent process.</p> <p>Consent refers to the collective decision made by the rights-holders and reached through the customary decision-making processes of the affected Indigenous Peoples or communities. Consent must be sought and granted or withheld according to the unique formal or informal political-administrative dynamic of each community. Indigenous peoples and local communities must be able to participate through their own freely chosen representatives, while ensuring the participation of youth, women, the elderly and persons with disabilities as much as possible</p>
Monitoring (by heritage monitoring teams)	The activity of selective monitoring of the earth disturbing activities i.e. vegetation and topsoil removal by one or more Cultural Heritage Monitors in a Work Front where monitoring has been agreed between APA and the relevant Traditional Owner group as a Management Measure in accordance in Table 3 in Section 4 in this CHMP

8. REFERENCES

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Appendix A PRO-FORMA FOR MONITORING, INSPECTION AND NEW DISCOVERY

Monitoring, Inspection and New Discovery Pro-forma

Name of Person Completing			
Form:	_____		
Position:	_____		
Date:	_____		
Signature:	_____		
Finds made?	Yes /	No	
Location			
KP:	_____		
Landmarks / Features:	_____		
Latitude / Longitude:	_____		
Details of Find			
Nature of Find:	_____		
Find made by:	_____		
Reported to:	_____		
Time / Date Reported:	_____		
Management			
Initial mitigation measures:	_____		
Follow up requirements :	_____		
Outcome			
Can work continue?	Yes /	No	
Actions required: (if any)	_____		

Sign off			
Representative:	Cultural Heritage	Cultural Heritage	APA
Name:	_____	_____	_____
Signature:	_____	_____	_____
Date:	_____	_____	_____

**Appendix D SITE AVOIDANCE ABORIGINAL
HERITAGE SURVEY REPORT WITH THE WIDI MOB
FOR THE APA NORTHERN GOLDFIELDS
INTERCONNECT PIPELINE PROJECT**

CONFIDENTIAL

Appendix E ADDENDUM REPORT WITH WAJARRI YAMATJI TRADITIONAL OWNERS

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**Appendix H REPORT OF AN ABORIGINAL
HERITAGE SURVEY IN THE DARLOT NATIVE TITLE
CLAIM: GOLDFIELDS WESTERN AUSTRALIA**

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Appendix I INCIDENT INVESTIGATION AND ANALYSIS REPORT FORM