



Appendix E:

Preliminary Aboriginal Archaeological Assessment

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BATTERY ENERGY STORAGE SYSTEM (ENV-2810)

Lot 2 LP34716 & Lot 2 PS817143

PRELIMINARY ABORIGINAL ARCHAEOLOGICAL ASSESSMENT

Final | June 2025

Prepared for Camperdown BESS Pty Ltd

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Acknowledgement of Country

Virtus Heritage acknowledges the Traditional Custodians of the land on which this project was undertaken and pays respect to Elders past, present and emerging.

Content Warning

Aboriginal and Torres Strait Islander people are warned that this publication may contain names and images of deceased people, descriptions of traumatic historic events and parts of Country that have been impacted by development.

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All queries related to the content, or to any use of this report must be addressed to Dr Mary-Jean Sutton at info@virtusheritage.com.au.

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- Appendix B Comments from Eastern Maar Aboriginal Corporation

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Definitions

Term	Description
Aboriginal Ancestral Remains	Aboriginal Ancestral Remains are the whole or part of the body of an Aboriginal person from the past
Aboriginal Cultural Heritage Register and Information System (ACHRIS)	Victorian Government's register for information on recorded Aboriginal sites
Aboriginal Cultural Heritage	Aboriginal places, Aboriginal objects and Aboriginal ancestral remains
Aboriginal object	An object in Victoria that contains significance to Aboriginal people and relates to the Aboriginal occupation of any part of Australia/ has been removed from an Aboriginal place
Areas of Cultural Heritage Sensitivity	Areas of cultural heritage sensitivity are landforms and land categories that are generally regarded as more likely to contain Aboriginal cultural heritage.
Cultural Heritage Management Plan (CHMP)	In Victoria, a CHMP is required for a high impact activity which falls in whole or in part within an area of cultural heritage sensitivity. High impact activity and area of cultural sensitivity are defined in the Victorian <i>Aboriginal Heritage Regulations 2018</i>
EMAC	Eastern Marr Aboriginal Corporation
First Peoples – State Relations	First Peoples – State Relations is an established group within the Department of Premier and Cabinet, responsible for nation-leading work in the areas of cultural rights, self-determination, treaty and truth – an extensive program of priority work with First Peoples. The group provides secretariat support for the Victorian Aboriginal Heritage Council through the Office of the Victorian Aboriginal Heritage Council. The Office supports Council to fulfil its independent statutory functions to achieve its functions under the Aboriginal Heritage Act 2006.
Harm	Damage, defacement, desecration, destruction, disturbance, injury or interference of an Aboriginal cultural heritage
High Impact Activity	Categories of activity that are generally regarded as more likely to harm Aboriginal cultural heritage
Registered Aboriginal Party (RAP)	The primary guardians, keepers and knowledge holders of Aboriginal Cultural Heritage in Victoria
Significant ground disturbance	Disturbance of the topsoil or a waterway by machinery, does not include ploughing other than ripping

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1. INTRODUCTION

Virtus Heritage was engaged by SLR Consulting (SLR) to prepare a preliminary Aboriginal archaeological assessment for Camperdown BESS Pty Ltd. The proposed works are located at a property legally identified as Lot 2 LP34716 and Lot 2 PS817143 (hereafter referred to as the 'Project Area') within the town of Camperdown Victoria. Camperdown is located within the Shire of Corangamite Local Government Area (LGA) (**Figure 1**).

1.1 PROJECT DESCRIPTION

The proponent proposes to use the location for a potential Battery Energy Storage System (BESS) with approximately 60MW capacity at the point of connection. The installation of the system involves the construction of access tracks, areas of hardstand, and the installation of electrical collection and conversion systems, including inverter and transformer units, switchyard, and control room. The initial concept drawings for the project identify the proposed works as having an impact footprint of approximately 170m by 125m, which is 1.9ha. An additional 1400m of overhead transmission line with 900m of existing transmission line located within the Wiridgil Road reserve is expected.

1.2 REPORT AIMS AND LIMITATIONS

This report was compiled in accordance with the Victorian *Aboriginal Heritage Act 2006*.

In general, the aims of the report are to:

- identify whether or not Aboriginal cultural heritage is, or is likely to be, present in the Project Area;
- if Aboriginal cultural heritage is present or likely to be present, determine whether the proposed development activities are likely to harm that heritage; and
- determine whether further assessment such as a Cultural Heritage Management Plan (CHMP) is required.

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This report provides advice on the archaeological/scientific potential of the Project Area to assist the proponent in their decision-making processes. The cultural (social) and spiritual values of the Project Area can only be commented on by the relevant Aboriginal community representatives. Consultation for this project was undertaken with the identified Registered Aboriginal Party, the Eastern Maar Aboriginal Corporation during the site inspection in March 2023.

This report is limited to the assessment of project impacts described in information provided by SLR. Virtus Heritage takes no responsibility for errors within Aboriginal Victoria's Aboriginal Cultural Heritage Register and Information System (ACHRIS) data.

The 2023 report was updated to include a new project layout, information about potential impacts, capacity of the BESS and updated search results.

1.3 VICTORIAN ABORIGINAL CULTURAL HERITAGE ACT 2006

In Victoria, impacts to Aboriginal heritage are managed through the *Aboriginal Cultural Heritage Act of 2006* (the Act) and the *Aboriginal Heritage Regulations of 2018* (the Regulations).

The Act recognises Aboriginal people as the primary guardians, keepers and knowledge holders of Aboriginal heritage. The Act establishes Registered Aboriginal Parties (RAPs) as the primary source of advice and knowledge regarding impacts to Aboriginal cultural heritage.

It is the RAPs' responsibility to lead heritage management in Victoria. This is done by evaluating Cultural Heritage Management Plans, making decisions on Cultural Heritage Agreements and assessing Cultural Heritage Permit applications. Eastern Marr Aboriginal Corporation is the RAP for the Project Area.

The Victorian Aboriginal Cultural Heritage Register is a register of Aboriginal places and objects known to the state. Access to the register is through the Aboriginal Cultural Heritage Register and Information System (ACHRIS). ACHRIS searches were conducted in 2023 and 2024 for the Project Area.

Areas of Cultural Heritage Sensitivity have been mapped by Victorians First Peoples – State Relations. Areas of Cultural Heritage Sensitivity are landforms that are more likely to contain Aboriginal cultural heritage. Examples include specific soil types and proximity to water. For this project, Areas of Cultural Heritage Sensitivity were identified through an ACHRIS search (undertaken 26th November 2024).

Impacts to Aboriginal cultural heritage are managed through Cultural Heritage Management Plans (CHMP). A CHMP is required for an activity (i.e. the use or development of land) if the activity:

- is a high impact activity, and
- falls in whole or in part within an Area of Cultural Heritage Sensitivity.

High impact activities are categories of activity that are generally regarded as more likely to harm Aboriginal cultural heritage. Under the Regulations, most activities classified as "high impact" are required to involve significant ground disturbance, including disturbance of the topsoil or a waterway by machinery (not including ploughing).

1.4 PROJECT TEAM AND QUALIFICATIONS

The initial report was compiled in February 2023 by Tyler Beebe, Senior Archaeologist (MA Cultural and Environmental Heritage, Australian National University) with quality review undertaken by Martin Wright Senior Archaeologist (BA Archaeology Hons, University of Sydney). Project information and description of works was provided by SLR.

The report was updated in November and December 2024 by Shaun Sewell, Senior GIS Analyst, (BInf Tech Computer Science, Queensland University of Technology) with assistance in reporting from by Dr Alice Buhrich, Principal Archaeologist (B. Arts Hons. Archaeology, University of New England; PhD Archaeology, James Cook University), Mary-Jean Sutton, Director (PhD Archaeology, University of Queensland; B. Arts Hon.s University of Sydney, Archaeology) and Anya Graubard, Senior Anthropologist (BA Hons. Anthropology, University of Nebraska-Lincoln). The final draft was reviewed by Julian Travaglia, Principal Archaeologist (B. Arts Hons. Archaeology University of Queensland).

1.5 ACKNOWLEDGEMENTS

We would like to acknowledge the assistance of the following individuals for the completion of this report:

- Hayden Harradine (Eastern Maar Aboriginal Corporation).
- Alieria Harrison (Eastern Maar Aboriginal Corporation).
- Terri Hormis and Gemma Lee (Vincent Clark Heritage).
- Luisa Figueiredo and Richard Simmons (SLR Consulting).

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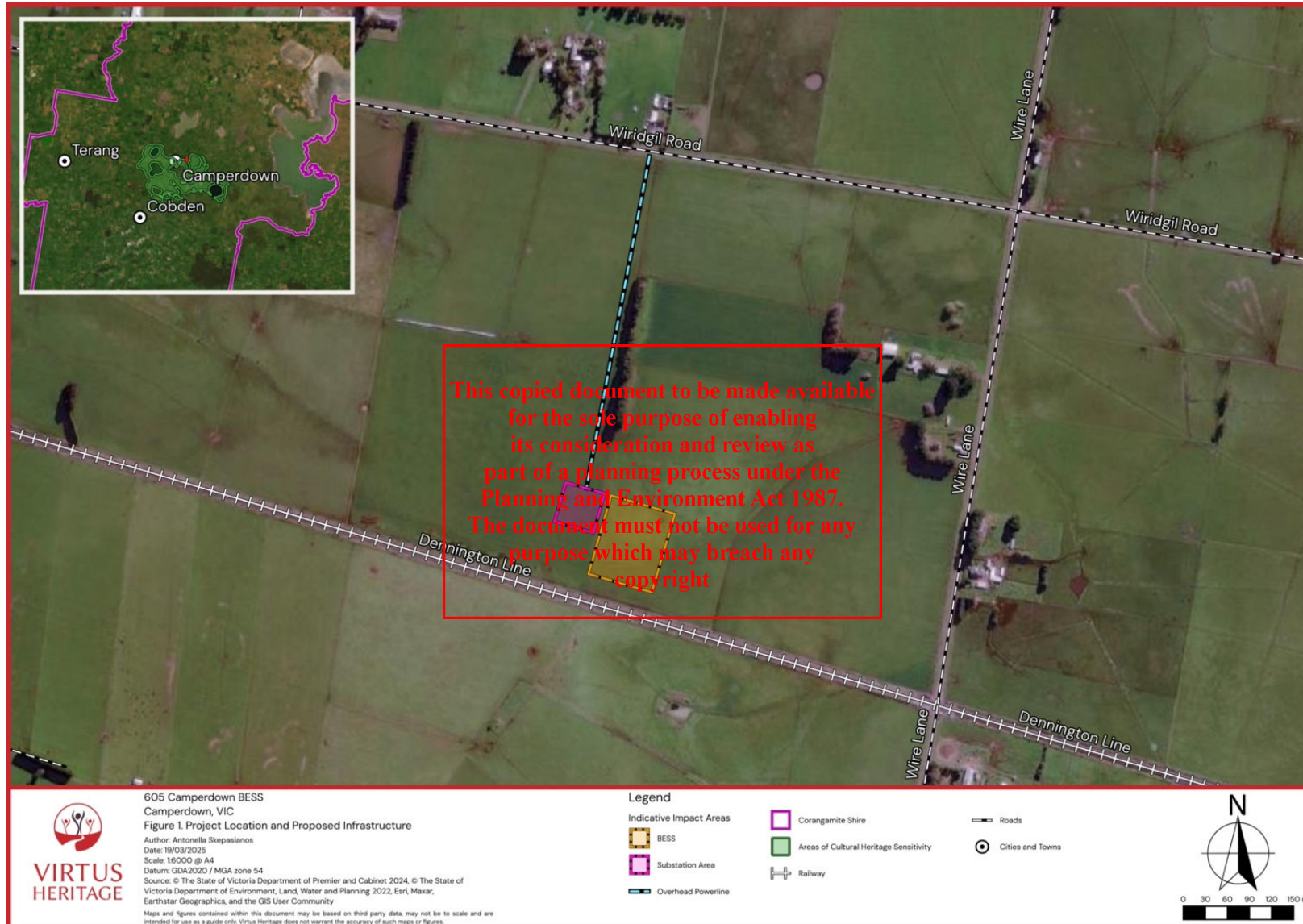


Figure 1. Project Area and Locality

2. CONSULTATION FOR CULTURAL INPUT & VALUES

Consultation was undertaken throughout the course of the project with First People's State Relations Group; Department of Premier and Cabinet (Victoria) and with representatives of the Eastern Maar Aboriginal Corporation (EMAC) (**Table 1**).

This assessment was conducted by an archaeologist providing advice on the archaeological (scientific) values of the Project Area. The cultural values of the Project Area were assessed by EMAC.

Table 1. Summary of Consultation

Date	Comment	Method (Email, Phone)
16 February 2023	Email was sent to the Victorian Aboriginal Heritage Register, maintained by the First People's State Relations Group, notifying them of our intent to undertake a preliminary survey of the property located within Camperdown.	Email
21 February 2023	An email was sent by Virtus to EMAC informing them of our Notice of Intent to Survey, and advising of representative bookings and possible survey dates	Email
1 March 2023	At the expiration of the 14-day notice period Virtus sent EMAC an email advising of a preferred date and time to undertake survey.	Email
1 March 2023	EMAC responded with a formal booking form.	Email
2 March 2023	Virtus provided completed booking form and inquired about EMAC's rates in which a response from EMAC was received the same day	Email
4 March 2023	Virtus received confirmation from EMAC that representatives would be available on the date and time requested.	Email
7 March 2023	Onsite discussions with representatives from EMAC resulted in the identification of no cultural value within the Project Area. Mt Noorat, located approximately 21 kilometers northwest of the Project Area, was identified as a highly significant cultural place to the local Aboriginal community, but has no cultural impact within the Project area.	In person
17 February 2025	EMAC requested update to Figure 9 and information on the Area of Sensitivity. The Area of Sensitivity is described in 3.1.2.	Teams
3 April 2025	Draft report sent to EMAC for review	Email
29 April 2025	EMAC provided EMAC's Contingency Plans to be included with the report. EMAC also made comments regarding the level of disturbance on site (refer to Appendix B).	Email

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3. ABORIGINAL PLACES RELEVANT TO THE PROJECT AREA

3.1 HERITAGE REGISTER AND DATABASE SEARCHES

This section of the report provides a summary of the results of relevant statutory heritage register searches.

3.1.1. National Native Title Tribunal

A search was undertaken of the National Native Title Register maintained by the National Native Title Tribunal (NNTT) on 1 February 2023 of the Project Area to identify if Native Title exist over the Project Area. The search identified the Eastern Maar People as the registered Native Title holder for the Project Area (Tribunal No. VC2012/001).

3.1.2. Aboriginal Cultural Heritage Register and Information System (ACHRIS)

Searches were conducted of ACHRIS on 2nd March 2023 for any Aboriginal heritage sites recorded within and/or adjacent to the property identified as Lot 2 LP34716 & Lot 2 PS817143, Camperdown, VIC. The ACHRIS search identified the Easter Maar Aboriginal Corporation as the Traditional Owners of the area.

The search identified no Aboriginal sites within the Project Area but did identify an Area of Sensitivity within 100m of the project. This is discussed in section 5.2.

An updated ACHRIS search was conducted 26th November 2024 for the updated Project Area. The search identified no newly recorded Aboriginal sites within the Project Area.

3.1.3. Australian Heritage Database

This database was searched on 29th November 2024 for all heritage items within the locality of Camperdown. Twenty-seven (27) sites were identified, none of which are within the project area.

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4. SITE TYPES AND PREDICTIVE MODEL

4.1 SITE TYPES

The following summary provides an indication of the likely occurrence of various Aboriginal site types within the Project Area and surrounds. It is based on a review of limited information for the area and is, by nature, broad in scope.

Scarred trees and **carved trees** contain evidence of scars and carved patterns which can be attributed as having Aboriginal cultural origin. Scarred trees are typically created by the removal of bark from the trunk of the tree (usually with a stone axe) to make shields, canoes, implements and other types of items which leave a wound on the tree trunk. Carved trees contain carved patterns on the tree trunk and are often found in association with ceremonial grounds, burials or cultural sites.

Isolated artefacts and **open campsites (artefact scatters)** are the locations of discarded stone artefacts, often material that has been discarded as part of making stone tools or over frequent episodes of occupation/visitation in an area. The objects are most likely to be found within 200m of a major water course, well drained alluvial flats, lower slopes adjacent to water courses, crests, and areas near lake foreshores where the landscape has not been heavily modified.

Middens are the accumulation of debris from fish, crustaceans, and shellfish (shells, fish bones) consumed as part of Aboriginal people's diet. Middens also often contain charcoal, stone artefacts, bone and other types of material used by Aboriginal people. Middens often occur near freshwater and saltwater sources which have potential to contain mussels, oysters and other types of edible shellfish.

Burial sites, bora grounds and **stone arrangements** possess high cultural values and should be managed with the highest cultural sensitivity. Ancestral figures are defined as 'the whole or part of the body of an Aboriginal person from the past' and can be found in dunes, trees, riverbanks and other locations. Bora grounds are places where ceremonial activities take place. There may be specific protocols associated with bora grounds, for example, men only sites. Only Aboriginal people can advise on appropriate protocols for bora grounds and other ceremonial sites. Bora grounds can be marked with circles of stones or other stone arrangements and/or carved trees or could also be made of raised earth.

Potential Archaeological Deposits refers to soil profiles within landforms which are predicted to contain buried evidence of Aboriginal occupation. This buried evidence is most often stone artefact scatters which survive most frequently in the archaeological record. In the region, buried archaeological deposits are nearly always found within the A unit soils (topsoil) or in alluvial deposits at depth. Occasionally artefacts are found in the B horizon in cracking clays where artefacts have moved down from the topsoil, or in highly erosional landscapes and within highly modified landscape contexts.

The Act describes **Intangible heritage** as 'any knowledge of or expression of Aboriginal tradition, other than Aboriginal cultural heritage, and includes oral traditions, performing arts, stories, rituals, festivals, social practices, craft, visual arts, and environmental and ecological knowledge, but does not include anything that is widely known to the public' (79B). Intangible heritage can include story places, tracks used by Ancestral figures and resources used by Aboriginal people such as plants for weaving or as cultural indicators or hunting grounds/fishing sites. Only the relevant Aboriginal group can identify intangible heritage.

4.2 PREDICTIVE MODEL

A predictive model for sites includes both analysis of the most likely site types to occur in a given area and predictions about where in the landscape sites might be likely to be located.

Based on the known archaeological, environmental and landscape context of the locality, a predictive model for evidence of Aboriginal occupation for the Project Area is presented below:

- Due to the historic removal of old growth trees, there is low to nil potential for Scarred Trees or Carved Trees to occur within the Project Area.
- The nearest source of permanent water is 6km to the southeast (Lake Purrumbete) therefore there is moderate to low potential for artefacts to occur in the Project Area.
- Due to the absence of suitable environments to support shellfish within the Project Area there is a low to zero potential for middens to occur.
- Considering the nature of disturbance on the Project Area, bora grounds and other ceremonial sites are unlikely, However, this will be determined in consultation with representatives of EMAC.
- Ritual burials have been found in dunes, caves, rock shelters, trees and riverbanks. While none of these landforms exist on the Project Area, the potential for burials of Aboriginal Ancestral remains should always be considered.
- Due to the previous and current landscape use as well as its distance from a reliable source of freshwater, it was determined that the Project Area was a significantly disturbed landscape and had a low to zero potential to contain a Potential Archaeological Deposit.
- Only EMAC can determine the presence of intangible heritage in the Project Area.

4.3 ARCHAEOLOGICAL POTENTIAL

Archaeological potential can be assessed in four categories: low to zero; low; moderate and high (**Table 2**).

The Project Area was determined to be low–moderate archaeological potential due to past land use resulting in disturbance (**Figure 2**).

Table 2. Definitions of Archaeological Potential

Archaeological Potential	Definition
Low to Zero	Landforms that have been totally modified and have low to zero potential for any remaining original soil profile or intact archaeological deposits. This category includes existing roads, quarry areas or any area where the original soil profile (topsoil – A horizon) has been stripped and the landform completely modified. This landform may also include areas where there are no intact A horizon soils due to high levels of erosion.
Low	Landforms that may have been utilised by Aboriginal people in the past, but at a lower intensity relative to all surrounding landforms, resulting in a lower artefact density than all surrounding landforms. This category also includes landscape areas of low terrain integrity, where geomorphic processes or human action may have redistributed artefacts from their deposited locations, such as stripping of soil to create levees or excavation to create culverts, dams or bridges, resulting in site disturbance or destruction.

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Archaeological Potential	Definition
Moderate	Landforms that are predicted to have been utilised by Aboriginal people in the past, but not intensively or repeatedly. There is therefore potential for artefactual deposition, but at a lower frequency and density than in areas of high archaeological potential. This category may also refer to landforms known to be sensitive for higher levels of Aboriginal occupation but where prior ground surface disturbances has decreased the archaeological integrity and potential of finding evidence of Aboriginal occupation (for example, creek confluences, alluvial terraces where stratigraphic integrity may have decreased due to previous land use).
High	Landscape areas predicted to have been intensively or repeatedly utilised by Aboriginal people in the past, such as creek confluences, Pleistocene terraces, floodplains or elevated landforms above major watercourses or floodplains. In these areas, site and artefact density are expected to be higher than the surrounding landscape, and sites in these areas may possibly be more complex. Terrain integrity in these areas may be variable although prior ground surface disturbance should be low or non-existent. An important characteristic of areas of high archaeological potential is the research potential or the capacity of sites to provide valuable information on past Aboriginal land use.

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Figure 2. Land-use and disturbance within the Project Area.

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5. SITE INSPECTION AND RESULTS

A site inspection of the Project Area was undertaken on the 7th March 2023. A pedestrian survey was undertaken by Tyler Beebe (Virtus Heritage, Senior Archaeologist) with assistance from two representatives from EMAC (Hayden Harradine & Alieria Harrison). The project area was divided into two areas: **Area 1** which consists of the footprint of the BESS unit and the proposed transmission line connecting the BESS unit to the existing transmission line located along Wiridgil Road; and **Area 2** which consists of the existing transmission line along Wiridgil Rd that connects to the substation to the west. **Area 1** is approximately 400m x 75m and is located within the two identified lots. The proposed transmission line in **Area 1** is approximately 1400m in length. A separate survey was taken of **Area 2**, as it was unclear at the time whether the project would be utilising the existing transmission infrastructure or installing a new one. SLR have now advised that Ares will ensure the transmission line will avoid the Culturally Sensitive Areas, as illustrated in **Figure 9**.

Area 1 had been disturbed through ongoing intensive farming and/or pastoral use in the past and at the time of survey was being used to run livestock. **Area 2** was observed to be disturbed through installation of existing transmission line, drainage works and existing road maintenance.

5.1 SITE INSPECTION RESULTS

Area 1 (Lot 2 LP34716 & Lot 2 PS817143) was covered in short dense grazing grass. The only area of ground exposure was centred around the livestock feeding trough and had been disturbed by livestock movement. There were no drainage lines (artificial or natural), or artificial dams observed within the Project Area (**Figures 3–7**).

Area 2 has been significantly disturbed by the installation of existing transmission line, artificial drainage, and works associated with road maintenance (**Figure 8**).

The landscape of the Project Area was flat and featureless and had been cleared of all large vegetation. The property has undergone ongoing intensive farming and/or pastoral use in the past and at the time of survey was being used to run livestock.

The nearest source of reliable freshwater, Lake Purrumbete, is located 5 kilometres to southeast of the Project Area. However, there is a network of drainage lines within the property immediately to the east. These drainage lines appear to be largely artificial and would only hold water after intense periods of rain.

No Aboriginal objects or areas of potential archaeological deposit (PAD) were identified during the survey. The EMAC representatives determined that the Project Area held no cultural value.

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Figure 3. Livestock trampling



Figure 4. Ground surface exposure around livestock feeding trough



Figure 5. Flat featureless landscape, view west



Figure 6. New transmission line route, view north



Figure 7. Livestock, view south



Figure 8. Disturbance associated with existing transmission line, view east

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5.2 AREAS OF CULTURAL HERITAGE SENSITIVITY

Areas of Cultural Heritage Sensitivity are landforms and land categories that are generally regarded as more likely to contain Aboriginal cultural heritage (Aboriginal Affairs Victoria, 2010).

Areas of Cultural Heritage Sensitivity were identified through the ACHRIS search and shown in green in **Figure 9**. As shown in **Figure 9**, parts of the eastern and southern property boundary are mapped by the Victorian *Aboriginal Heritage Regulations 2018* as being sensitive for Aboriginal cultural heritage.

The Area of Sensitivity is the northern margin of a landscape that includes Lake Purrumbete (5kms southeast of the project), Lake Gnotuk (5.5kms west of the project) and Lake Bullen (5kms Southwest of the project). The Area of Sensitivity is shown in the inset map of **Figure 9**. The Project Area does not overlap with the Area of Sensitivity.

Mount Wiridgil, is mapped as a separate Area of Sensitivity which does not intersect the project and is 4km east of the project.

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Figure 9. Project Area (red) and Areas of Cultural Heritage Sensitivity (light green)

6. CONCLUSIONS & RECOMMENDATIONS

6.1 PRESENCE OF ABORIGINAL CULTURAL HERITAGE

The review of previous archaeological work in the area, site inspection and consultation with EMAC identified there is a low potential for Aboriginal cultural heritage to be present in the Project Area outside of the area of Aboriginal Cultural Sensitivity. In correspondence from EMAC during the review of this draft report, EMAC noted that the level of disturbance on site required further mitigation with what would be needed for any potential unexpected finds (refer to **Appendix A**). No Aboriginal cultural heritage objects or places were identified in 2023 or updated 2024 ACHRIS searches or during the 2023 site inspection or by EMAC to date through consultation on this project.

6.2 CULTURAL HERITAGE MANAGEMENT PLAN REQUIREMENTS

A CHMP is required where a high-risk activity is proposed inside an Area of Cultural Heritage Sensitivity. While the proposed work meets the criteria for a high-risk activity, impact areas are outside the area mapped as Areas of Cultural Heritage Sensitivity as shown in **Figure 9**. The transmission line has been redesigned to ensure it will not impact the Areas of Cultural Heritage Sensitivity.

We recommend all ground disturbance impacts are planned outside the Areas of Cultural Heritage Sensitivity. This includes construction of the BESS and sub-station and all ancillary work such as access roads, site compounds and the storage unit construction.

6.3 CHANCE FINDS PROCEDURE

The following recommendations have been made based on the information provided on project impacts, consultation to date, relevant archaeological and environmental background research.

1. Unexpected Finds Procedure

It is recommended that the Unexpected Finds Procedure outlined in the Eastern Maar Cultural Heritage Contingency Plan (**Appendix A**) be implemented for the duration of the project. In the unlikely event that a suspected Aboriginal object/s is identified the procedure will include the following:

- Works are to stop immediately.
- The area of the suspected find/s is to be fenced off with an appropriate buffer and protected.
- EMAC – State Relations must be notified and await further written advice on the appropriate management of the find.

2. Unexpected Aboriginal Ancestral Remains Procedure

It is recommended that the Unexpected Aboriginal Ancestral Remains procedure outlined in the Eastern Maar Cultural Heritage Contingency Plan (**Appendix A**) be implemented for the duration of the project. In the unlikely event that suspected human remains are identified, the procedure will include the following:

- Works are to stop immediately, and Victoria Police and the Coroner's Court of Victoria are to be notified.
- The area of the suspected find/s is to be fenced off with an appropriate buffer and protected.
- If there are reasonable grounds to believe that the remains are Aboriginal, the Coronial Admissions and Enquiries hotline must be contacted on 1300 888 544.

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- No further work can be undertaken until the Coronial Admissions and Enquiries provide written advice.

3. Induction

All site workers and personnel involved in site impact works should be inducted and briefed on the possibility that Aboriginal sites and objects may be located during construction. Site workers and personnel involved in site impact works should be aware of their responsibilities according to the provisions of the *Aboriginal Cultural Heritage Act 2006* (the Act) and the *Aboriginal Heritage Regulations 2018* (the Regulations) in the unlikely event that unknown objects or items are uncovered during proposed works.

This induction package should be developed in consultation with EMAC, prior to work proceedings. The induction should include:

- The contact phone numbers of the First Peoples – State Relations regional archaeologist, and EMAC, in case unknown objects or items are uncovered during excavation.
- The relevant contact phone number of the proponents' site representative responsible for this project, in case unknown objects or items are uncovered during excavation.
- The penalty for moving Aboriginal objects without authorisation under the Act.
- Information on the types of unexpected heritage objects, items & relics that might be located, and their legal protection.
- The Unexpected Finds and Aboriginal Ancestral Remains Procedures, as outlined in Recommendation 1 and 2.

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References

Aboriginal Affairs Victoria. (2010). *Practice Note: Significant Ground Disturbance*. Melbourne: State of Victoria Department of Planning and Community Development.

Aboriginal Heritage Act 2006, Victoria

<https://content.legislation.vic.gov.au/sites/default/files/2023-05/06-16aa027-authorised.pdf>

Aboriginal Heritage Regulations 2018, Victoria

https://content.legislation.vic.gov.au/sites/default/files/e0e1e95d-4d99-3fec-aae2-5ef6cc5eff88_18-59sra001%20authorised.pdf

Victorian Aboriginal Heritage Council (2020) *Use of a Due Diligence Approach to Assessment of Aboriginal Cultural Heritage*. Available at: <https://www.aboriginalheritagecouncil.vic.gov.au/use-due-diligence-approach-assessment-aboriginal-cultural-heritage> (accessed 24/02/2023).

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Appendix A

Eastern Maar Cultural Heritage Contingency Plan

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EASTERN MAAR CULTURAL HERITAGE CONTINGENCY PLAN

A copy of this Contingency should be kept in the project management folder and on any work site this plan has been issued for.

This EMAC Contingency Plan is to be used only where a Cultural Heritage Management Plan (CHMP) or an Aboriginal Cultural Heritage Land Management Agreement (ACHLMA) is not required by law and with the permission of EMAC.

This EMAC Contingency Plan applies to the discovery of previously unrecorded Aboriginal heritage, it does not apply to registered Aboriginal heritage places on the Victorian Aboriginal Heritage Register (VAHR) identified during a CHP. The measures in this plan help to ensure that any newly discovered Aboriginal place (site) is reported in consultation with the appropriate authorities and protected from harm in accordance with the Aboriginal Heritage Act 2006.

If suspected Aboriginal Heritage is discovered during works, follow these procedures:

Unexpected Discovery of Aboriginal Cultural Heritage (Excluding Human Remains)

If suspected Aboriginal cultural heritage (excluding Aboriginal Ancestral Remains) is uncovered or identified during the activity, the following contingency plan must be followed:

Discovery

- i. The activity must cease within at least 10 metres of the suspected Aboriginal cultural heritage, and a stop works buffer must be implemented. Works may continue in the remainder of the activity area.
- ii. The stop works area around the suspected Aboriginal cultural heritage must be fenced off using appropriate temporary fencing (chain wire fence panels with concentric base feet) to protect the suspected Aboriginal cultural heritage from further disturbance. No-go zone signage must be attached to the fencing and be clearly visible.
- iii. The suspected Aboriginal cultural heritage must not be picked up or removed from the stop works area.

Notification

- i. The individual who uncovered or identified the suspected Aboriginal cultural heritage must notify the site manager and/or Permit Applicant of the discovery immediately.
- ii. The Permit Applicant must notify the relevant RAP or Traditional Owner representatives and a Heritage Advisor within one business day of the discovery of the suspected Aboriginal cultural heritage.

Assessment

- i. An appropriately qualified Heritage Advisor must be engaged to inspect the suspected Aboriginal cultural heritage within three (3) business days of notification.
- ii. Relevant RAP or Traditional Owner representatives must be provided the opportunity to participate in the inspection.

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- iii. The Heritage Advisor will consult with the relevant RAP or Traditional Owner representatives regarding the management, collecting and recording of the cultural material. The Heritage Advisor will notify the Secretary of the discovery and any agreements.
- iv. If the suspected Aboriginal cultural heritage is assessed by the Heritage Advisor to be Aboriginal cultural heritage, then the Heritage Advisor must fully record and document the Aboriginal cultural heritage, and the following site protection, impact mitigations or salvage conditions must be completed.

Impact Mitigation or Salvage

- i. It is the obligation of the Permit Applicant to ensure that all reasonable attempts to avoid or minimise harm to the Aboriginal cultural heritage have been undertaken, in consultation with the RAP or Traditional Owner representatives.
- ii. If the Aboriginal cultural heritage is determined to be significant (for example, an intact cultural deposit), site protection or impact mitigation conditions may be required. If site protection or impact mitigation measures are not possible a salvage excavation of part or all of the Aboriginal Place may be required prior to the activity proceeding.
- iii. In the situation where a salvage excavation is required the following process must be adhered to:
 - a) The extent and methodology of the salvage program will be determined by the RAP or relevant Traditional Owner representatives, in consultation with the Heritage Advisor and Permit Applicant.
 - b) Any salvage program must be undertaken in accordance with First Peoples - State Relation's Practice Note: Salvage Excavations, by a suitably qualified archaeologist/Heritage Advisor with assistance from the RAP or relevant Traditional Owner representatives.
 - c) The Heritage Advisor must update or complete the relevant Victorian Aboriginal Heritage Register (VAHR) place and component forms, including the object collection form, and submit the documentation to the VAHR within fourteen (14) days of the assessment. The Heritage Advisor must notify the RAP or relevant Traditional Owner representatives, via email, once the VAHR has been updated.
 - d) An archaeological report meeting the Secretary standards and detailing the methods, analysis and results of the salvage program must be submitted to the VAHR, the Sponsor and the RAP or relevant Traditional Owner representatives no later than six (6) months after the salvage excavation has been completed.
 - e) At the completion of analysis, any Aboriginal cultural heritage collected during the salvage program must be managed as outlined in the removal, custody, curation, and management of Aboriginal Cultural Heritage contingency.

Recommencement of the activity

- i. The activity may recommence in the stop works area once:
 - a) The Aboriginal cultural heritage material has been identified, fully documented, and assessed, including the collection and analysis of any artefacts by a Heritage Advisor.



- b) All reasonable attempts to avoid harm and appropriately protect the Aboriginal cultural heritage has been made by the Permit Applicant in consultation with the RAP or relevant Traditional Owner representatives.
- c) If harm to the Aboriginal cultural heritage cannot be avoided, then an appropriate archaeological salvage program, meeting the minimum standards as outlined above, has taken place.
- d) The Heritage Advisor has updated or completed VAHR place and component form(s), submitted the forms to the VAHR within fourteen (14) business days of the assessment, and the forms have been approved.
- e) The Permit Applicant, Heritage Advisor and the RAP or relevant Traditional Owner representatives have agreed that no further action is warranted.

Dispute Resolution

If all parties fail to reach an agreement under this contingency plan, this will be classified as a dispute. Any dispute that may arise from this process must be dealt with under the Dispute Resolution contingency.

Unexpected Discovery of Human and Aboriginal Ancestral Remains

If suspected human remains are discovered, you must contact the Victoria Police and the State Coroner's Office immediately. If there are reasonable grounds to believe that the remains are Aboriginal Ancestral Remains, the Coronial Admissions and Enquiries hotline must be contacted on 1300 888 544.

Any such discovery at the activity area must follow these steps.

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Discovery

- a) If suspected human remains are discovered, all activity within at least 30 metres must cease immediately.
- b) The remains must be left in place and protected from harm or damage.
- c) Do not contact the media; do not take any photographs of the remains other than those requested by the relevant authorities below.

Notification

- a) If suspected human remains have been found, the State Coroner's Office (**1300 309 519**) and the Victoria Police (**000**) must be notified immediately.
- b) If there are reasonable grounds to believe the remains are Aboriginal Ancestral Remains, the Coronial Admissions and Enquiries hotline must be immediately notified on **1300 309 519**.
- c) If the human remains are confirmed by State Coroner's Office to be Aboriginal Ancestral Remains, the person responsible for the activity must report the existence of them to the Victorian Aboriginal Heritage Council in accordance with section 17 of the *Aboriginal Heritage Act 2006* (<https://www.aboriginalheritagecouncil.vic.gov.au/report-ancestral-remains-submit>).



- d) If the remains are confirmed to be Aboriginal Ancestral Remains, the RAP or relevant Traditional Owner representatives must be notified immediately as listed in the Contacts of this Permit.
- e) All details of the location and nature of the human remains must be provided to the relevant authorities.

Impact Mitigation or Salvage

- a) The Victorian Aboriginal Heritage Council, after taking reasonable steps to consult the RAP or relevant Traditional Owner representatives, will determine the appropriate course of action as required by section 18(2)(b) of the *Aboriginal Heritage Act 2006*
- b) An appropriate impact mitigation or salvage strategy as determined by the Victorian Aboriginal Heritage Council must be implemented by the Permit Applicant. All costs associated with this will be the responsibility of the Permit Applicant.

Curation and Further Analysis

- a) The treatment of salvaged Aboriginal Ancestral Remains must be in accordance with the direction of the Victorian Aboriginal Heritage Council.

Reburial

- a) Reburial to occur in consultation with the relevant RAP or relevant Traditional Owner representatives.
- b) Any reburial site(s) must be fully documented by an experienced and qualified archaeologist and all relevant details provided to VAHR.
- c) Appropriate management measures must be implemented to ensure the Aboriginal Ancestral Remains are not disturbed in the future.

Compliance

It is essential that the steps and requirements outlined in this contingency plan are adhered to, to ensure this happens the following is recommended:

- All staff involved in the works must be familiar with the content and intent of this Contingency Plan prior to works commencing,
- A Copy of the Contingency Plan with relevant contact details must be kept on site during works,
- All queries or questions should be addressed prior to works beginning to avoid non-compliance,
- If these contingencies are not implemented, it may expose an increased risk of breaching the harm provisions in the *Aboriginal Heritage Act 2006*, offences may lead to; penalties (fines) or prosecution.

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Eastern Maar
Aboriginal Corporation

PO Box 546
Warrnambool VIC 3280

Contacts

NOTE: Project Manager is to complete the below table prior to commencement of works

Role	Name	Organisation	Contact Number
Emergency Management Victoria			000 or (03) 8685 1355 (general enquiries line)
State Coroner's Office	Coronial Admissions and Enquiries line	State Coroner's Office	1300 309 519
Manager Ancestral Remains	Odetta Moore	Ancestral Remains Unit – Victorian Aboriginal Heritage Council	M: 0437 956520
Registered Aboriginal Party	John Clarke	Eastern Maar Aboriginal Corporation	0429 598 481 culturalheritage@easternmaar.com.au
Regional Manager – First Peoples - State Relations	Matthew Phelan	First Peoples State Relations	M: 0400 975 367
Project Manager			
Other Site Contacts			

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Appendix B

Comments from Eastern Maar Aboriginal Corporation

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Liam Clerke

From: Emily Corris <emily.corris@easternmaar.com.au>
Sent: Tuesday, 29 April 2025 9:43 AM
To: Mary-Jean Sutton
Cc: Katie Yang; Virtus Consultation; Liam Clerke; Nathalia Guimaraes
Subject: RE: 605 Camperdown BESS Cultural Heritage due diligence
Attachments: EMAC_Contingency_Plans_2025.pdf

Ngatta Mary-Jean,

Apologies for the delay, we are quite busy at the moment.

The report looks fine, I have attached a copy of EMAC's Contingencies Plans that can be included in it. The plans provided more information about what is required if any cultural heritage is identified during works.

EMAC does also want to note we would not agree with the description of Area 1 as "significantly disturbed". *"Area 1 had been significant disturbed through ongoing intensive farming and/or pastoral use in the past and at the time of survey was being used to run livestock"*. Although farming and agricultural uses of land does cause disturbance, a surface survey does not provide enough information to be able to state the level of that disturbance. These are also activities that although disturbing the soil and potential cultural heritage, do not remove them; and that is an important aspect to consider.

Yugurakut ngo (Take Care),

Emily Corris

RAP Technical Specialist
Eastern Maar Aboriginal Corporation
Phone: 0429 553 655
Email: emily.corris@easternmaar.com.au
Website: www.easternmaar.com.au



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Ngootyoon Meerreeng, Ngootyoon Maar

(Healthy Country, Healthy People)

From: Mary-Jean Sutton <mj.sutton@virtusheritage.com.au>
Sent: Wednesday, 16 April 2025 8:00 AM
To: Emily Corris <emily.corris@easternmaar.com.au>
Cc: Admin <admin@easternmaar.com.au>; Katie Yang <kyang@slrconsulting.com>; Virtus Consultation <consultation@virtusheritage.com.au>; Liam Clerke <l.clerke@virtusheritage.com.au>
Subject: Re: 605 Camperdown BESS Cultural Heritage due diligence

Hi Emily

Following up on EMAC's review of this report see chain below ?

Thankyou

Mary-Jean

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From: Alice Buhrich <a.buhrich@virtusheritage.com.au>
Sent: Thursday, April 3, 2025 1:03:37 PM
To: Emily Corris <emily.corris@easternmaar.com.au>
Cc: admin@easternmaar.com.au <admin@easternmaar.com.au>; Mary-Jean Sutton <mj.sutton@virtusheritage.com.au>
Subject: 605 Camperdown BESS Cultural Heritage due diligence

Dear Emily

We met (online) together with Vincent Clark Heritage on 17 February about two Battery Energy Storage System (BESS) projects on the Eastern Marr lands.

Vincent Clark are working on the Cobden BESS proposal and Virtus Heritage on the Camperdown BESS proposal. Virtus had completed a draft assessment of the Camperdown project in 2023 which included a site inspection with Eastern Marr representatives.

When we met in February, we arranged for me to provide a draft report to Eastern Marr for their comments. You requested specifically for the report to include more information on the Area of Sensitivity shown in Fig 9.

Please find the Camperdown BESS draft cultural heritage assessment attached, for your review.

Could you please provide your comments to Mary Jean Sutton, copied into this email? Mary Jean will be taking over the project management.

Thank you
Alice



Dr Alice Buhrich (*she/her*)
PRINCIPAL ARCHAEOLOGIST
BA Hons. Archaeology, University of New England;
PhD Archaeology, James Cook University
a.buhrich@virtusheritage.com.au
0488 035 778

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(02) 6676 4354



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Virtus Heritage is committed to the spirit of reconciliation and acknowledges Aboriginal and Torres Strait Islander peoples as the First Australians and the Traditional Custodians of the states and territories of Australia. We recognise the Traditional Owners of the lands we work within. We pay our respect to Elders past, present and emerging in maintaining the culture, country and their spiritual and historical connections to the lands and waters.

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Please note: I work Tuesday, Wednesday and Thursday. I value your time and will respond during my standard working hours. We value flexible working hours, but don't expect you to read, action or respond out of your own working hours.

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