

MARDIE SALT AND POTASH PROJECT

CULTURAL HERITAGE MANAGEMENT PLAN

1	01-Feb-2022	Issued for Use	Janelle Fell	Angela Glover	Angela Glover
0	02-Dec-2021	Issued for Use	Janelle Fell	Angela Glover	Angela Glover
A	02-Nov-2021	Draft for review	Janelle Fell	Angela Glover	Angela Glover
Revision	Date	Description	Author	Checker	Approver
Document Number		0000-LH-PLN-0001			Total Pages: 41

*Electronic documents, once printed, are non-controlled and may become outdated.
 Refer to Electronic Document Management System for the current version.*

Table of Contents

1. Definitions..... 1

2. PURPOSE 2

3. COMPANY COMMITMENTS AND OBLIGATIONS 6

 3.1 Traditional Owner groups 6

 3.2 Land Access Deeds 6

 3.3 Legislation 6

4. PROJECT PERSONNEL RESPONSIBILITY 7

 4.1 Compliance with BCI Systems 7

 4.2 Roles and Responsibilities 7

 4.3 Induction and Cultural Awareness Training 7

 4.4 Communication 7

5. ABORIGINAL HERITAGE SITE / PLACE 8

 5.1 Definition 8

 5.2 Types 8

6. CONSULTATION AND FIELDWORKS..... 9

7. HERITAGE SURVEYS 10

 7.1 Framework 10

 7.2 Summary of Heritage Survey Reports 11

8. SUMMARY OF SECTION 18 NOTICES AND CONSENTS 13

9. SUMMARY OF HERITAGE FINDS..... 15

10. MEASURES TO PROTECT ABORIGINAL HERITAGE 16

 10.1 Key Hazards 16

 10.2 Heritage Sites Impacts and Management Strategies 17

 10.3 Ground Disturbing Activities / Ground Disturbance Permit 26

 10.4 Aboriginal Monitoring of Ground Disturbing Activities 26

 10.5 Archaeological Salvage 26

 10.6 Demarcation of Heritage Sites 29

 10.7 Aboriginal Heritage Incidents 32

 10.8 Discovery of Aboriginal Sites (Excluding Human Remains) 32

 10.9 Discovery of Human Remains 32

 10.10 Monitoring, Auditing and Reporting 33

11. PLAN REVIEW BY IMPLEMENTATION COMMITTEE 33

12. APPENDICES 34

 12.1 Appendix A – Reference Documents 34

 12.2 Appendix B - BCI Cultural Heritage Policy 35

 12.3 Appendix C - Ground Disturbance Procedure 36

 12.4 Appendix D - Demarcation and Survey Procedure 37

 12.5 Appendix E - Aboriginal Heritage Management Guidelines for Contractors 38

List of Figures

Figure 1: Mardie Project Footprint.....	3
Figure 2: Native Title Determination Boundaries.....	5
Figure 3: Mardie Salt Project – Section 18 Status	24
Figure 4: Mardie Salt Project - Heritage Status	25
Figure 5: Demarcation Sites	31

List of Tables

Table 1: Definitions, Terminology and Abbreviations	1
Table 2: Summary of Consultations and Fieldworks	9
Table 3: Summary of Final Heritage Survey Reports –YM Determination Area	11
Table 4: Summary of Final Heritage Survey Reports – RRK Area	13
Table 5: Section 18 Notices and Consents	14
Table 6: Summary of Heritage Finds – RRK Area.....	16
Table 7: Summary of Heritage Finds – YM Determination Area	16
Table 8: Key Hazards to Aboriginal Heritage During Construction	16
Table 9: Heritage Sites Impacts and Management Strategies	18
Table 10: Salvage Heritage Places – YM	26
Table 11: Salvage Heritage Places – RRK.....	28
Table 12: Demarcation Sites.....	29

1. DEFINITIONS

Table 1: Definitions, Terminology and Abbreviations

Terminology or Abbreviation	Definition
CHMP	Cultural Heritage Management Plan (the Plan, this Plan)
Aboriginal Heritage Site	Means an area identified to have cultural importance and significance to Aboriginal people. This includes but is not limited to registered heritage sites within the meaning of the AHA.
ACMC	Aboriginal Cultural Materials Committee
<i>Aboriginal Heritage Act 1972 (WA)/AHA</i>	The Aboriginal Heritage Act affords protection to all Aboriginal sites which can be determined to meet its section 5 definitions, irrespective of whether it is known; has been assessed by the ACMC; or is on the Register of Sites.
AHR	Aboriginal Heritage Regulations 1974 (WA)
ASX	Australian Securities Exchange
BCI	BCI Minerals Limited (ASX – BCI) www.bciminerals.com.au
Contractor	Organisation engaged under contract by BCI including Contractor, Sub-Contractor, supplier, site supplier, vendor, seller
Department of Planning, Lands and Heritage/DPLH	The Department of Planning, Lands and Heritage (DPLH) means the department responsible for the administration of the Aboriginal Heritage Act 1972 (WA).
Ground Disturbance Permit/GDP	Means a permit to conduct work that impacts, marks or disturbs the ground issued pursuant to the Ground Disturbance Procedure.
Ground Disturbing Project Operations	Means Project Operations that are not Low Impact Project Operations and which require machinery, earth moving and construction equipment, including track clearance, trenching, drilling, bulk sampling and construction works.
Heritage Team	Means the person/s within BCI (and subsidiary entities) responsible for managing the Aboriginal heritage process and impact assessments.
LAD	Land Access Deed
Licence to Operate Register	The register of BCIs legal obligations and commitments
Low Impact Project Operations	Includes aerial surveys, geological mapping, metal detecting, rock chip, hand specimen and soil and drainage sampling, only using hand-held tools and non-ground disturbing environmental, topographical, geophysical (including electrical and magnetic) and other surveys and anything necessary or incidental thereto.
Mardie Project	Mardie Salt & Potash Project
Plan	Cultural Heritage Management Plan (CHMP)
Mardie Salt Project/Project	As shown in Figure 1
Project Operations	Means the exercise of BCIs rights in the area where Mining Act tenure is held.
Project Personnel	Staff, Contractors, Subcontractors, vendors, suppliers, and visitors to the Project

Terminology or Abbreviation	Definition
Registrar	The person appointed under the Aboriginal Heritage Act 1972 to administer the day-to-day operations of the Aboriginal Cultural Material Committee along with perform other functions as allocated under the Act.
RM/Registered Manager	Registered Manager means a person who is appointed registered manager of a mine under section 33 of the Mines Safety and Inspection Act 1994.
RRK People	Robe River Kuruma People (formerly referred to as the KM People or Kuruma Marthudunera People)
RRKAC	Robe River Kuruma Aboriginal Corporation ICN 7612
Section 16 consent	Means, subject to section 18, the authorisation given by the Registrar under the Aboriginal Heritage Act 1972 to enter upon and excavate an Aboriginal site and the examination or removal of any thing on or under the site in such a manner and subject to conditions the ACMC advise.
Section 18 consent	Means the consent given by the Minister for Aboriginal Affairs to the owner of any land to use the land subject of a heritage site for a specific purpose.
Site	Mardie Salt & Potash Project area
Traditional Owner groups	Refers to the YM People and the RRK People in their capacity as traditional owners, native title holders, agreement counterparts and custodians of the land the subject of the Mardie Salt Project.
WAC	Wirrawandi Aboriginal Corporation ICN [insert]
YM People	Yaburara & Mardudhunera People

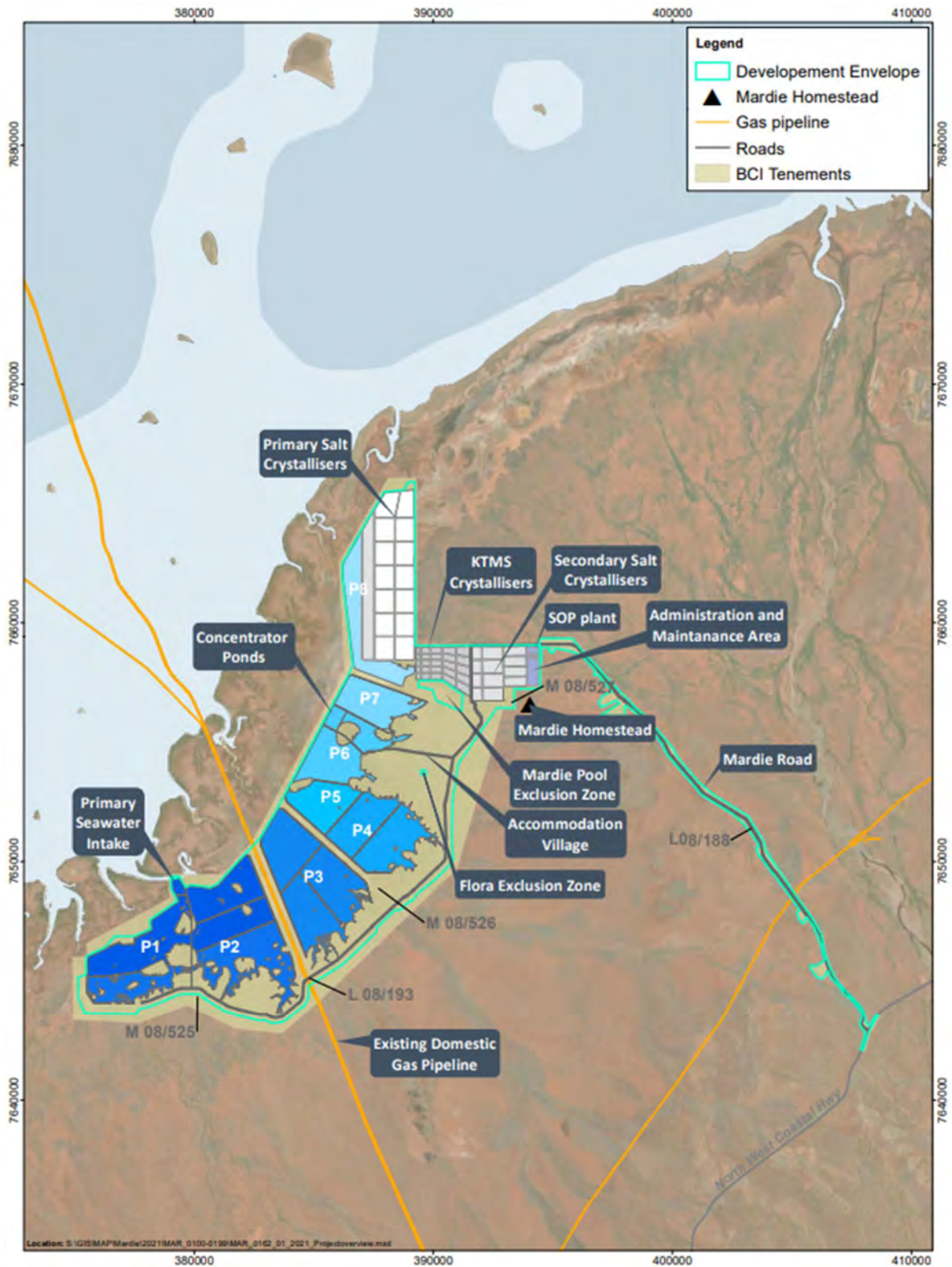
2. PURPOSE

The heritage management system at The Mardie Project consists of the executed land access Deeds and this Plan to achieve the outcomes of Ministerial Statement No. 1175 and the Environmental Protection Authority's objectives for Social Surroundings.

This Plan describes the process for the ongoing management of Aboriginal heritage places located within BCI's Project as shown in Figure 1. This Plan sets out steps to be followed by the company, contractors and all employees to identify and manage Aboriginal heritage that may be affected by the Project in a manner that complies with Legislation, the LADs with the relevant Traditional Owner groups and the commitments made to these groups.

This Plan sets BCI's requirements for Project Personnel and goes beyond the minimum legislative requirements and is intended to reflect best practice and what is expected by relevant Traditional Owner groups to manage and protect Aboriginal heritage.

Figure 1: Mardie Project Footprint



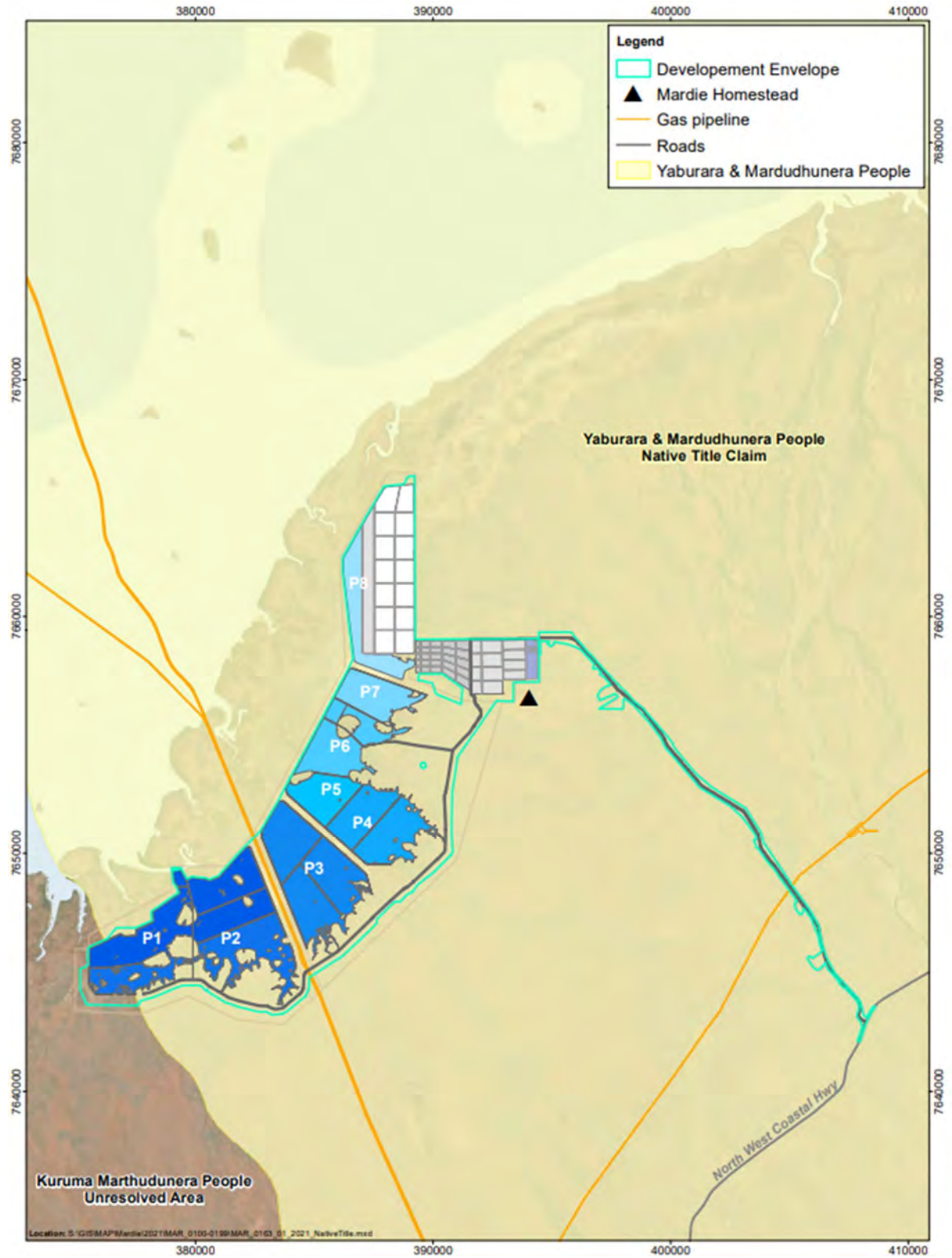
As shown in Figure 2, this Plan covers Project areas within the Yaburara & Mardudhunera Native Title determination area. A very small portion in the southwest of the Project has no current native title claim or determination; however, the RRK People previously held a claim in this area. Through extensive discussions regarding the RRK Peoples claim, BCI recognise the enduring connection the RRK People have to this area and formally recognise this including their rights and obligation to speak for cultural heritage in this area.

As a party to the agreements made with the Traditional Owner groups, BCI will be responsible for facilitating implementation of the agreement requirements within the Project and will ensure that all project contractors and personnel also abide by the agreement requirements.

This Plan has been developed based on the findings of Aboriginal heritage surveys including archaeological and ethnographic assessments and consultation with Aboriginal stakeholder groups.

This Plan is an evolving document and will continue to be updated as more information becomes available about the cultural heritage aspects of the Project area, and further consultation, is undertaken with the Aboriginal stakeholder groups or where there legislative or policy change.

Figure 2: Native Title Determination Boundaries



3. COMPANY COMMITMENTS AND OBLIGATIONS

3.1 Traditional Owner groups

The Project area affects land in which the YM People has Native Title Determination (WAD127/1997). The YM People and RRK People have shared rights in relation to historical overlap of areas which cover the Project. BCI formally recognise the RRK People enduring connection to the area and to the Unresolved Area to the south, identified in Figure 2.

As part of the YM determination, both YM People and RRK People are responsible protection of country and cultural heritage and have agreed processes for how the Traditional Owners manage heritage. These processes are to be followed by WAC in managing heritage.

3.2 Land Access Deeds

BCI has entered into a LAD with the YM People (executed November 2012) and another LAD with the RRK People (executed October 2012). A framework for consultation with Traditional Owners is set out in these Deeds along with key obligations for all parties on a range of matters including the management of impacts of the Project on Aboriginal heritage.

As part of its agreement with the Traditional Owner groups, BCI has committed to:

- Maintain timely, open and flexible communication with the Aboriginal stakeholder groups.
- Consult with the Traditional Owner groups in relation to the management of Aboriginal heritage in their respective areas throughout the life of the project in the agreed manner, including but not limited to:
 - Consultation methods such as a minimum of two Implementation Committee meetings per year, and
 - Continued access to country for traditional laws and customs.
- Endeavour to avoid identified Aboriginal sites where possible, however, should this prove not possible a section 18 under the Aboriginal Heritage Act (1972) will be applied for.
- Fulfil its statutory obligations under the Aboriginal Heritage Act (1972) and exceeding its statutory obligations in terms of best practice heritage management

3.3 Legislation

The following legislation may apply in relation to the impact of the Project on Aboriginal Heritage:

- Aboriginal Heritage Act 1972 (WA) (AHA)
- Aboriginal Heritage Regulations 1974 (WA)
- Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)
- Criminal Code Compilation Act 1913 (WA)
- Coroners Act 1996 (WA)
- Native Title Act 1993 (Cth)

4. PROJECT PERSONNEL RESPONSIBILITY

4.1 Compliance with BCI Systems

BCI subsidiaries and Project Personnel undertake to abide by and use BCI policies, systems and procedures. All discussion in this Plan referring to systems, data recording, reporting, analysis, document filing, records management, etc. refers to the use of BCI's intranet/internet-based information management system "INX – InForm".

Although Contractors must have their own management plans and systems, all recorded data, hazards/risks observations, assessments, reports, investigations, findings, etc. relating to Project work is entered into INX – InForm.

Project Personnel must comply with this Plan along with:

- Incident Reporting and Management Procedure BCI-WHS-PR-009 Rev 0 (Appendix A)
- Cultural Heritage Policy (Appendix B)
- Ground Disturbance and Topsoil Stockpiling Work Instruction BCI-ENV-PRO-001 (Appendix C)
- Demarcation and Survey Procedure WIN-0000-CI-PRO-001 (Appendix D)
- Aboriginal Heritage Management Guidelines for Contractors MAR-PRJ-CPR-005 (Appendix E)

This will ensure that Aboriginal heritage obligations that apply to the Project are upheld and respected.

4.2 Roles and Responsibilities

The Contractor shall describe the roles and responsibilities of its key Project Personnel who will manage compliance under this Plan.

4.3 Induction and Cultural Awareness Training

Before commencing work on site, all Project Personnel must undergo a formalised and mandatory site induction, which will include specific information regarding the Aboriginal heritage values within the Project area and the obligations of all personnel under the AHA. Any Project Personnel conducting work on site for a period over three weeks during the construction and operation phase will be required to complete cultural awareness training within six months of commencing site work.

The purpose of these inductions and training is to increase awareness of Aboriginal culture, and to demonstrate the cultural differences that may arise between a person's own culture and Aboriginal culture and formulate strategies to accommodate these differences. The cross-cultural training program will be developed in consultation with the Traditional Owner groups.

4.4 Communication

Project Personnel will continuously communicate with its personnel to facilitate effective implementation of this Plan, including toolbox and prestart meetings held regularly by each construction crew which will contain appropriate heritage issues based on heritage consideration associated with the proposed activities.

For example, heritage topics may include:

- New heritage management procedures or information.
- Avoidance of sites as communicated in Ground Disturbance Permits.

- Hazard Assessments including consideration of potential heritage impacts.
- Briefing on heritage incidents that have occurred, including actions taken.
- Addressing questions and concerns raised by personnel.
- Reiteration of heritage management information.

5. ABORIGINAL HERITAGE SITE / PLACE

5.1 Definition

The definition of what constitutes an Aboriginal site as defined by Section 5 of the AHA is set out as follows:

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

BCI also recognises that the Aboriginal people take a broader approach to heritage and cultural values. BCI recognises that Aboriginal people have different views on their own definition of a cultural heritage site and that this perspective sees Aboriginal cultural heritage sites inextricably linked with the environment and the health of country. Aboriginal people see their sites in relation to one another, linked across the landscape, rather than individually.

5.2 Types

A diverse range of places can comprise Aboriginal heritage sites. However, they fall into two basic but overlapping categories: archaeological and ethnographic sites. The following terminology of Aboriginal sites has been taken from the DAA website (2010). BCI recognises that Aboriginal people view archaeological and ethnographic sites differently and such sites may not fall neatly or at all into the following descriptors.

- Archaeological sites: Places where cultural material remains are associated with past Aboriginal land use. These may include:
 - **Structure**: This is a generic label used to describe a range of archaeological features including those interpreted as lizard ‘habitats’, hunting blinds and stone arrangements.
 - **Fish traps**: Often stone structures constructed in tidal ocean, river and estuary environments and inland drainage features.
 - **Modified Trees**: These are trees that show evidence of having been carved or scarred for the purpose of creating territorial markers, the extraction of raw material for the production of items of material culture (such as bowls or shields).
 - **Painting**: Aboriginal paintings were undertaken on a wide variety of media, but are best known from rock shelters, caves and overhangs where they are protected from the detrimental effects of the weather. A wide variety of motifs, including anthropomorphic, animal and geometric figures were used; stencilled objects are also common.

- **Engraving:** Places where designs are carved, pecked or abraded into a rock surface.
 - **Grinding patches / grooves:** These generally take the form of circular smooth depressions found on rocky exposures and are thought to represent activities relating to the production of ‘food’.
 - **Quarry:** These sites can take several forms. In most cases they comprise surface hardstone exposures, which were exploited as a raw material for the manufacture of stone artefacts. Ochre and other mineral pigments were also exploited, usually being mined from naturally occurring deposits.
 - **Artefact Scatters:** Stone artefact scatters are the most common archaeological component represented throughout Western Australia. In most cases they comprise a surface scatter of stone artefacts, although a sub-surface component may also be present, particularly in depositional environments such as those found in the coastal and sub-coastal areas. Such deposits are particularly significant in terms of the potential afforded for dating the site and examining change over time.
 - **Middens:** Such sites consist of scatters of humanly deposited shell, usually with a stratified component.
- **Ethnographic sites:** Places of spiritual importance to Aboriginal people (for religious or other reasons). Such places may have no distinguishing characteristics to alert non-Aboriginal people to their existence. These may include:
 - **Ceremonial:** These are places that have been used for ceremonial purposes. Although such sites can sometimes be identified by the presence of stone arrangements or modelling of the ground surface, many can only be located through consultation with people who have either direct or indirect knowledge of such sites.
 - **Mythological:** These sites generally encompass some natural feature, such as a hill or waterway, which is considered significant to contemporary Aboriginal people.
 - **Burials:** These are generally difficult to identify unless explicitly distinguished by some sort of marker, are known to family and / or community members, or have been recorded in a documentary or oral format.

6. CONSULTATION AND FIELDWORKS

Table 2 lists the more significant events and timeline of the consultation process between BCI and the YM People and RRK People to date. Consultation is ongoing as the project evolves, and additional events will be added to Table 2 where new areas identified for project activities and are the subject of heritage clearances from time to time.

Table 2: Summary of Consultations and Fieldworks

GROUP	DATE OF CONSULTATION	CONSULTATION DETAILS
YM People	August 2017	Mardie Project Briefing
RRK People	September 2017	Mardie Project Briefing
YM People	September 2017	Heritage Constraints Assessment
RRK People	September 2018	Heritage Survey
YM People	December 2018	Work Program Clearance

GROUP	DATE OF CONSULTATION	CONSULTATION DETAILS
YM People	March 2019	Land Access Deed Negotiations
RRK People	May 2019	Aboriginal Archaeological Work Area Clearance survey
YM People	July 2019	Salt Royalties Negotiations
YM People	July 2019	Section 18 Consultation Meeting
YM People	August 2019	Salvage and Relocation
YM People	August 2019	Work Program Clearance
YM People	September 2019	Salt Royalties Negotiations
RRK People	July 2020	Archaeological and Ethnographic Site Avoidance survey
YM People	July 2020	Aboriginal Heritage Survey
YM People	September 2020	Aboriginal Heritage Survey
YM People	September 2020	Section 18 Consultation Meeting
RRK People	October 2020	Section 18 Consultation Meeting
YM People	November 2020	WAC Port Negotiations
RRK People	December 2020	Implementation Committee Meeting
YM People	January 2021	WAC Board Meeting
YM People	January 2021	Site Avoidance Aboriginal Heritage Survey
YM People	February 2021	Aboriginal Heritage Survey
YM People	March 2021	Aboriginal Heritage Survey
RRK People	March 2021	Mardie Project Due Diligence Meeting
YM People	March 2021	WAC Port Consultation
YM People	March 2021	WAC Environmental Footprint Consultation
YM People	April 2021	WAC Port Negotiations
YM People	May 2021	Aboriginal Heritage Survey
YM People	June 2021	WAC Members Consultation
RRK People	September 2021	Section 18 Reaffirmation Meeting
RRK People	October 2021	Implementation Committee Meeting

7. HERITAGE SURVEYS

7.1 Framework

BCI entered a LAD with the YM People (executed November 2012) and the RRK People (executed October 2012) which sets out key obligations all both parties on a range of matters including the management of impacts of the Project on Aboriginal heritage.

BCI must issue a written notice setting out the nature and location prior to conducting any Low Impact Project Operations. WAC or RRKAC as appropriate have 10 business days to advise whether the works will impact on any Aboriginal sites.

Prior to conducting any Ground Disturbing Project Operations, BCI must provide written notice to the WAC or RRKAC as appropriate setting out the works proposed to be undertaken and provide a statement of whether a heritage survey is required. When a heritage survey is required, BCI must provide a methodology and the date BCI proposes that the heritage survey commences. WAC or RRKAC as appropriate are required to provide a list of up to six Aboriginal Consultants and heritage professionals, a date and estimate of reasonable fees and expenses within ten business days.

Should the Traditional Owners disagree with a statement in the written notice that a heritage survey is required they must, within ten business days, give BCI written notice setting out the reason.

BCI commits to adhering to the conclusions, recommendations and conditions contained in heritage survey reports.

7.2 Summary of Heritage Survey Reports

The following Tables list the timeline and report titles for the formal heritage surveys carried out to date; Table 3 lists the summary of final heritage survey reports for the YM People and, Table 4 lists the summary of final heritage survey reports for the RRK People. If additional formal heritage surveys are carried out, this plan and Tables 3 and 4 will be updated as required.

Table 3: Summary of Final Heritage Survey Reports –YM Determination Area

DATE	AUTHOR	CONSULANTCY	METHOD	REPORT TITLE
September 2017	Damien Lafrentz	Horizon Heritage Management		Heritage Constraints Assessment for BC Iron Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, September 2017
December 2018	Damien Lafrentz, Philippa Hunter & Nigel Tonkin	Horizon Heritage Management	Ethnographic and Archaeological	Work Program Clearance for the Yaburara & Marthudunera People and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, December 2018
August 2019	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Salvage and Relocation	Salvage and Relocation Report of the Mardie Salt Project Area, South of Karratha, Western Australia, August 2019
August 2019	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Ethnographic and Archaeological	Work Program Clearance for the Yaburara & Marthudunera People and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, August 2019

DATE	AUTHOR	CONSULANTCY	METHOD	REPORT TITLE
July 2020	Damien Lafrentz & Nigel Tonkin	Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, July 2020
September 2020		Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, September 2020
January 2021	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Ethnographic and Archaeological	Site Avoidance Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, January 2021
February 2021	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, February 2021
March 2021	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, March 2021
May 2021	Damien Lafrentz & Carly Sims	Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, May 2021
August 2021	Damien Lafrentz	Horizon Heritage Management	Salvage and Relocation	Wirrawandi Aboriginal Corporation Salvage and Relocation Report of the Mardie Salt Project Area, South of Karratha, Western Australia, August 2021

DATE	AUTHOR	CONSULANTCY	METHOD	REPORT TITLE
August 2021	Damien Lafrentz & Aaron Floky	Horizon Heritage Management	Ethnographic and Archaeological	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, July & August 2021

Table 4: Summary of Final Heritage Survey Reports – RRK Area

DATE	AUTHOR	CONSULANTCY	METHOD	REPORT TITLE
May 2019	Wendy Ryan	Gavin Jackson Cultural Resource Management	Archaeological	A Report of the Aboriginal Archaeological Work Area Clearance survey within the BCI Mardie Salt and Potash Project Area, Pilbara, Western Australia
June 2019	Edward M. McDonald	Ethnoscience	Ethnographic	Report on an Ethnographic Site Avoidance Survey of BCI's Mardie Salt & Potash Pilbara, Western Australia
July 2020	John Cecchi	JCHMC	Archaeological and Ethnographic	Report of an Archaeological and Ethnographic Site Avoidance Survey of BCI Minerals Limited Mardie Project

8. SUMMARY OF SECTION 18 NOTICES AND CONSENTS

Table 5 lists the Section 18 notices and consents that apply to works within the Project.

Table 5: Section 18 Notices and Consents

SUBMISSION	NOTICE DETAILS	CONSENT DATE	CONSENT DETAILS
S18-69-17160	ID 11409 (Mardie Station A) ID 11410 (Mardie Station B) *June 2021 update – 11409 and 11410 removed from the Register of Aboriginal Heritage Places and Objects ID 17833 (Tap Site 2 – not a site, rather a place) ID 22932 (Hadson 2 – not a site, rather a place) ID 22933 (Hadson Midden 1)	22-Jan-20	For the development, operation, maintenance and decommissioning of the Mardie salt and potash project including: feasibility investigations including establishing access tracks, conducting site trials, clearing/construction of access tracks/roads to support project construction and operation, construction of pump stations, solar evaporation ponds, crystalliser ponds and processing plants, construction of supporting infrastructure including but not limited to accommodation village, administration facilities, laboratory, electrical power generation and distribution, waste water treatment plant, waste facilities, communication facilities and maintenance workshops and operation and maintenance of the above and decommissioning and rehabilitation of the above

S18-29750343-852	<p>10351 (Wiruwandi Plain) 10536 (Wiruwandi Plain) 10537 (Wiruwandi Plain) 38619 (Mardie Salt Thalu 01) 38638 (Mardie Salt 01) 38637 (Mardie Salt 02)</p>	Pending	<p>For the development, operation, maintenance and decommissioning of the Mardie salt and potash project including: clearing/construction and upgrade of Mardie Road; minor grading / reshaping of the road to improve safety, installation of fencing along the road; installation of cattle grids along the road, increase road width to 10m (1 lane each way), improve road surface (remains unsealed), maintain current rout of road, some corners may be slightly modified in order to achieve design speed compliance, new material for the road will be sourced from borrow areas along the road alignment, construction water for road upgrade will be sourced from bores (to be sunk still) along the road; construction of crystalliser ponds; construction of gas pipeline; operation and maintenance of the above; and decommissioning and rehabilitation of the above.</p>
S18-28792850-837	17429 (Peters Creek)	Pending	<p>For the development, operation, maintenance and decommissioning of the Mardie Salt and Potash Project including: construction of a pond wall (4.2m high and 3-4m in width) for the purpose of holding sea water; construction of the pond wall will result in diversion of water flows from Peters Creek to the southern boundary of pond 1 towards the coast; operation and maintenance of the pond wall and decommissioning and rehabilitation, post mine closure.</p>

9. SUMMARY OF HERITAGE FINDS

Table 6 (RRK) and Table 7 (YM) summarise the heritage finds within the Project to date.

Table 6: Summary of Heritage Finds – RRK Area

RRK People		
Category	Identified	Subject to s18 consent
Artefact scatter / Quarries	129	-
Engravings	-	-
Grinding Base	-	-
Ethnographic Place	-	-
Shell scatter	1	-
Water Source	-	-
Mythological	1	1

Table 7: Summary of Heritage Finds – YM Determination Area

YM People		
Category	Identified	Subject to s18 consent
Artefact Scatter / Quarries	67	7
Engravings	0	0
Grinding Base	6	4
Ethnographic Place	0	0
Shell scatter	7	4
Water Source	1	0
Mythological	2	2

10. MEASURES TO PROTECT ABORIGINAL HERITAGE

10.1 Key Hazards

Construction will involve ground disturbing activities and other general access requirements, which will change from time to time as the construction programme evolves. Table 8 lists the generic key hazards expected during construction, and the mitigating strategies to be put in place. Project Personnel will be required to abide by all GDP conditions (refer section 10.3), to ensure these key hazards are managed appropriately and to avoid any potential impacts.

Table 8: Key Hazards to Aboriginal Heritage During Construction

KEY HAZARDS	MITIGATION STRATEGIES
Vehicle / machinery activity	<ul style="list-style-type: none"> • Vehicle and machinery movements limited to areas that have been subject to heritage clearance. • Issuing of ground disturbing permits which clearly delineate approved areas for ground disturbance and outline heritage restrictions. • Demarcation of heritage places and sites as required, to avoid indirect disturbance. • Salvage of materials where requested by the Traditional Owner groups.

KEY HAZARDS	MITIGATION STRATEGIES
Vegetation clearing	<ul style="list-style-type: none"> • Vegetation clearing limited to areas that have heritage clearance. • Issuing of ground disturbing permits which clearly delineate approved areas for ground disturbance and outline heritage restrictions. • Demarcation of heritage places and sites as required, to avoid indirect disturbance. • Salvage of materials where requested by the Traditional Owner groups.
Earthworks	<ul style="list-style-type: none"> • Earthworks limited to areas that have been subject to heritage clearance. • Issuing of ground disturbing permits which clearly delineate approved areas for ground disturbance and outline heritage restrictions. • Demarcation of heritage places and sites as required to avoid indirect disturbance. • Salvage of materials where requested by the Traditional Owner groups.
Maintenance and construction activities	<ul style="list-style-type: none"> • Construction activities limited to areas that have been subject to heritage clearance. • Issuing of ground disturbing permits which clearly delineate approved areas for ground disturbance and outline heritage restrictions. • Aboriginal monitors to be engaged in highly sensitive areas. • Demarcation of heritage places and sites as required to avoid indirect disturbance. • Salvage of materials where requested by the Traditional Owner groups.
Direct human contact	<ul style="list-style-type: none"> • Demarcation of heritage places and sites as required, to avoid indirect disturbance. • All BCI personnel and contractors will attend compulsory inductions prior to commencing site work and will undergo training in relation to cultural heritage obligations under this Plan. • Any personnel conducting work for over one month will also be required to participate in cultural awareness training to improve their understanding of cultural heritage values within the area. • All BCI personnel adhering to walk and driving tracks.
Generation of dust and vibration (operation of heavy machinery / blasting)	<ul style="list-style-type: none"> • Ongoing monitoring of dust and vibration levels and inspection of heritage places in proximity.
Changes in hydrology	<ul style="list-style-type: none"> • Ongoing monitoring of water levels.

10.2 Heritage Sites Impacts and Management Strategies

Table 9 lists the heritage sites (by specific ID number) for the Project. The table includes all identified cultural material including previously identified DPLH sites and newly recorded places, along with the expected extent of impact by the Project and the proposed mitigating strategies. BCI also recognises sites of significance to the YM People and RRK People which are included in Table 12. As discussed in Section 10.1 above, the Heritage Team will work with Project Personnel to assess the potential impact to the listed heritage sites for their workplaces, and which will result in workplace specific mitigating actions.

Figure 3 Section 18 status and Figure 4 Heritage status are detailed maps of the Project area. These maps are included to provide a visual representation of the heritage sites and places identified within the Project area.

Table 9: Heritage Sites Impacts and Management Strategies

Heritage place ID	Site Status	Type	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
38618	Registered	Artefacts/Scatter	Mardie Salt 04 - Artefacts/Scatter	No impact	Demarcation and site avoidance
10536	Registered	Artefact/Scatter	The site was recorded by archaeologist Nigel Tonkin and anthropologist Damien Lafrentz in co-operation with YM Traditional Owners in July 2020 DPLH 10536 Gas Pipeline 39 consists of sparse grinding material including mullers, grind stones and hammer stones. A low density artefact scatter is also present	Partial impact – Mardie Road intersects site The Land will be impacted by the construction/clearance and upgrade of the existing Mardie Road and gas pipeline. A salvage program will be arranged prior to disturbance.	Section 18 (pending S18-29750343-852)
10537	Registered	Artefact/Scatter	The site was recorded by archaeologist Nigel Tonkin and anthropologist Damien Lafrentz in co-operation with YM Traditional Owners in July 2020 DPLH 10537 Gas Pipeline 40 consists of sparse grinding material including mullers, grind stones and hammer stones. A low density artefact scatter is also present	Partial impact – Mardie Road intersects site The Land will be impacted by the construction/clearance and upgrade of the existing Mardie Road and gas pipeline. A salvage program will be arranged prior to disturbance.	Section 18 (pending S18-29750343-852)

Heritage place ID	Site Status	Type	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
10351	Registered	Mythological	Wiruwandi Plain - This registered mythological site was recorded by Dr Palmer in 1975 and later by Brown in 1979. It extends from Wearawandie Well in the south to Mardie Wool Shed in the north and west of the Mardie-North West Costal Highway Road. It forms part of the Wiruwandi (Boomerang Wood) Dreaming which also includes a hill and a pool. The Plain is located adjacent to the Mardie Salt Project. This site has significance to the YM Aboriginal people as a mythological dreaming story site	Partial impact – Mardie Road intersects site The Land will be impacted by the construction/clearance and upgrade of the existing Mardie Road and gas pipeline.	Section 18 (pending S18-29750343-852)
38619	Registered	Ceremonial, Mythological	Maride Salt Thalu 01 - The site was recorded by archaeologist Nigel Tonkin and anthropologist Damien Lafrentz in co-operation with YM Traditional Owners in July 2020 Mardie Salt Thalu 01 is a Thalu weather site used to increase rain and thunder to help maintain country. It is a naturally occurring iron stone outcropping with the main focus being a large boulder at 397738E 7656806N close to the existing Mardie Road	Partial impact – Mardie Road intersects site The Land will be impacted by the construction/clearance and upgrade of the existing Mardie Road and gas pipeline. A salvage program will be arranged prior to disturbance.	Section 18 (pending S18-29750343-852)

Heritage place ID	Site Status	Type	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
6322	Registered	Artefacts/Scatter, Ceremonial, Grinding Patches/Grooves, Midden/Scatter, Skeletal Material/Burial, Camp	Mardie Creek Burial - The burial (human cranium/skull) is located further west from Mardie Pool closer to the coastal tidal zone on a sand ridge covered with spinifex scrub. A low density artefact and shell scatter is noted around the burial area. An extremely large (approx. 500 m x 100 m) high density artefact and shell scatter (Saccostrea spp. Terebralia spp. Anadara spp. and Melo spp.) site numbered in the thousands is found between the burial and Mardie Pool along the northern bank of the Mardie Creek	No impact	Site exclusion zone – demarcation
26578	Other Heritage Place	Artefacts/Scatter, Historical, Midden/Scatter, Mythological, Named Place, Natural Feature, Plant Resource, Water Source	Wirawundi Pool - Recorded in 2009 by AIC anthropologist Alex Lyneham and Mardudhunera Elder Dorrie Wally. Wirawundi is the Mardudhunera name for Mardie. This pool was utilised by Mardudhunera people for water, food and recreation (swimming). It holds great value too many generations of Mardudhunera people and those that worked on the station. There is a creation story (Boomerang) and women's birthing associated with the pool.	No impact	Site exclusion zone - demarcation

Heritage place ID	Site Status	Type	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
22932	Other Heritage Place	Artefacts/Scatter	Hadson 2 - Recorded in 1990 by Murphy and McDonald in conjunction with representatives from the Mardudhunera group. This artefact scatter consists of flaked stone artefacts and shell fragments (Melo spp. Anadara spp.) on a sand plain in a coastal flat. It is located at 378280E 7647309N	Fully destroy – artefacts to be salvaged	S18-21967086-684
22933	Other Heritage Place	Artefacts/Scatter, Midden/Scatter	Hadson Midden 1 - Recorded in 1990 by Murphy and McDonald in conjunction with representatives from the Mardudhunera group. This artefact scatter and midden consists of flaked stone artefacts and some shells (Saccostrea spp. Terebralia spp. Anadara spp. and Melo spp.) but, because of the presence of coral blocks and mangrove branches, the shell scatter may be natural. It is located at 385280E 7647309N.	Fully destroy – artefacts to be salvaged	S18-21967086-684
22934	Other Heritage Place	Artefacts/Scatter, Midden/Scatter	Hadson Midden 2 – Artefacts/Scatter, Midden/Scatter	No impact	Demarcation and site avoidance

Heritage place ID	Site Status	Type	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
17429	Registered	Mythological, Named Place	Peter's Creek - Peters Creek was recorded in 1994 by McDonald, Hales and Associates during a survey of the northern section of the Goldfields Gas Transmission Project. The Peters Creek site has a Mardudhunera name which is Nyungarrarra (meaning 'blue sky').	Partial impact - The Land will be impacted by the construction of the pond wall, which will result in the diversion of water from Peters Creek for the operation of the Mardie Salt Project. Diversion of water from Peters Creek.	Section 18 (pending S18-28792850-837)

Heritage place ID	Site Status	Type	Site Description	Extent of proposed impacts	Status or Proposed Mitigation
38594	Other Heritage Place	Artefacts/Scatter, Grinding Patches/Grooves, Camp	<p>Mardie Salt 03 - The site was recorded by archaeologist Nigel Tonkin and anthropologist Damien Lafrentz in co-operation with YM Traditional Owners in July 2020</p> <p>Mardie Salt 03 is an artefact scatter and grinding site. This site is a moderately sized artefact scatter of approximately 10 - 15 pieces of knapped stone artefacts. Most artefacts were made from locally sourced Chert, with lesser numbers of Ironstone and Mudstone. The site appeared to be a short-term transitional habitation site with the artefact distribution predominately in 4 small clusters with a sparse background scatter. Maximum artefact density was approximately 3m²Most notable at the site was the five grindstones and four mullers with one particular grindstone showing signs of extensive use and resurfacing (pitting)</p>	No impact	Demarcation and site avoidance
17833	Registered	Artefact/Scatter, Shell	<p>Tap Site 2 - Recorded by Lantzke in 1999 during an archaeological survey of the Mardie Gasfield Exploration Programme. The site consists of a small scatter of shells and flaked stone artefacts made from chert, dolerite and basalt. It is located on the shore of a salt flat island at 378938E 7646377N</p>	Salvage – Pond 1	S18-21967086-684

Figure 3: Mardie Salt Project – Section 18 Status

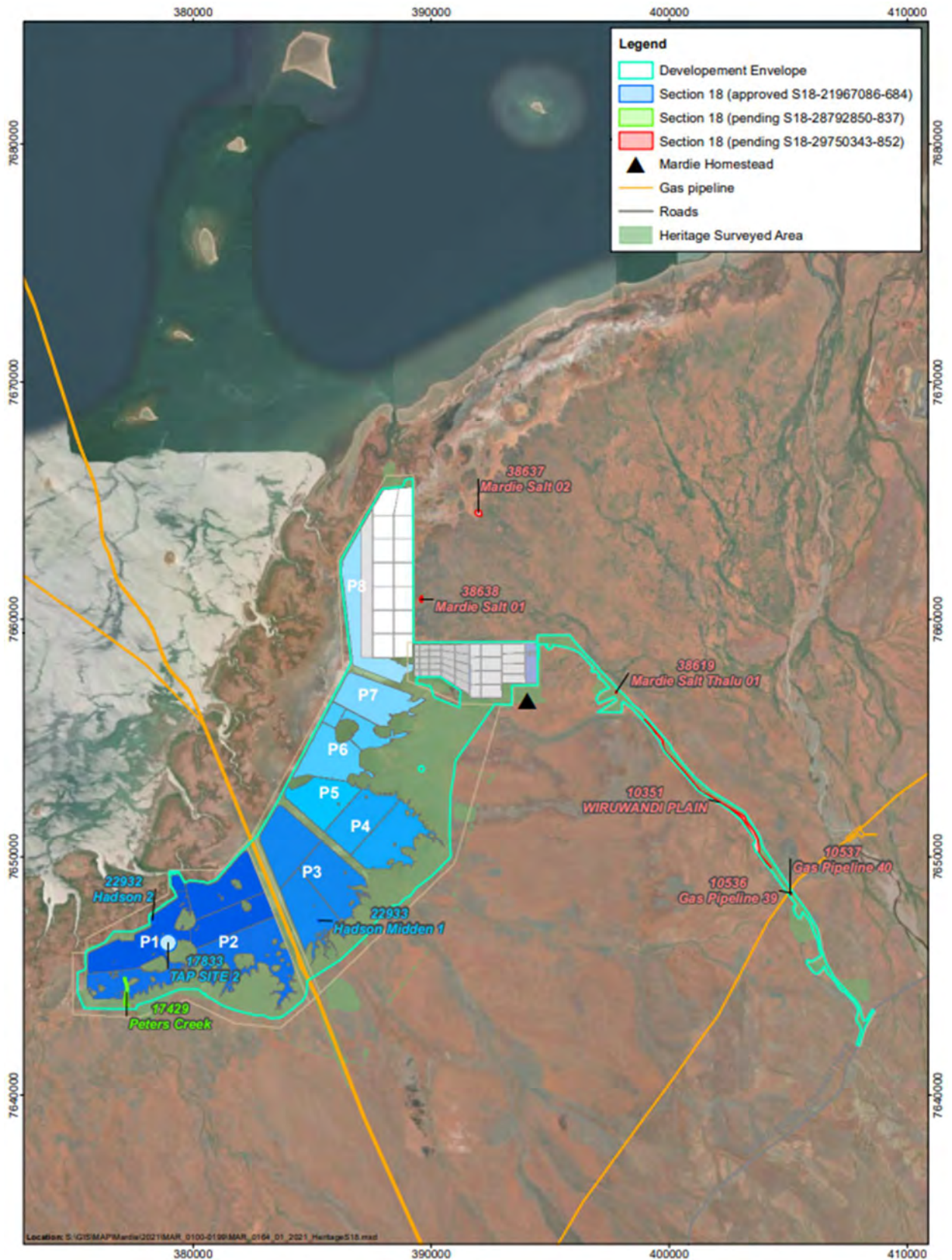
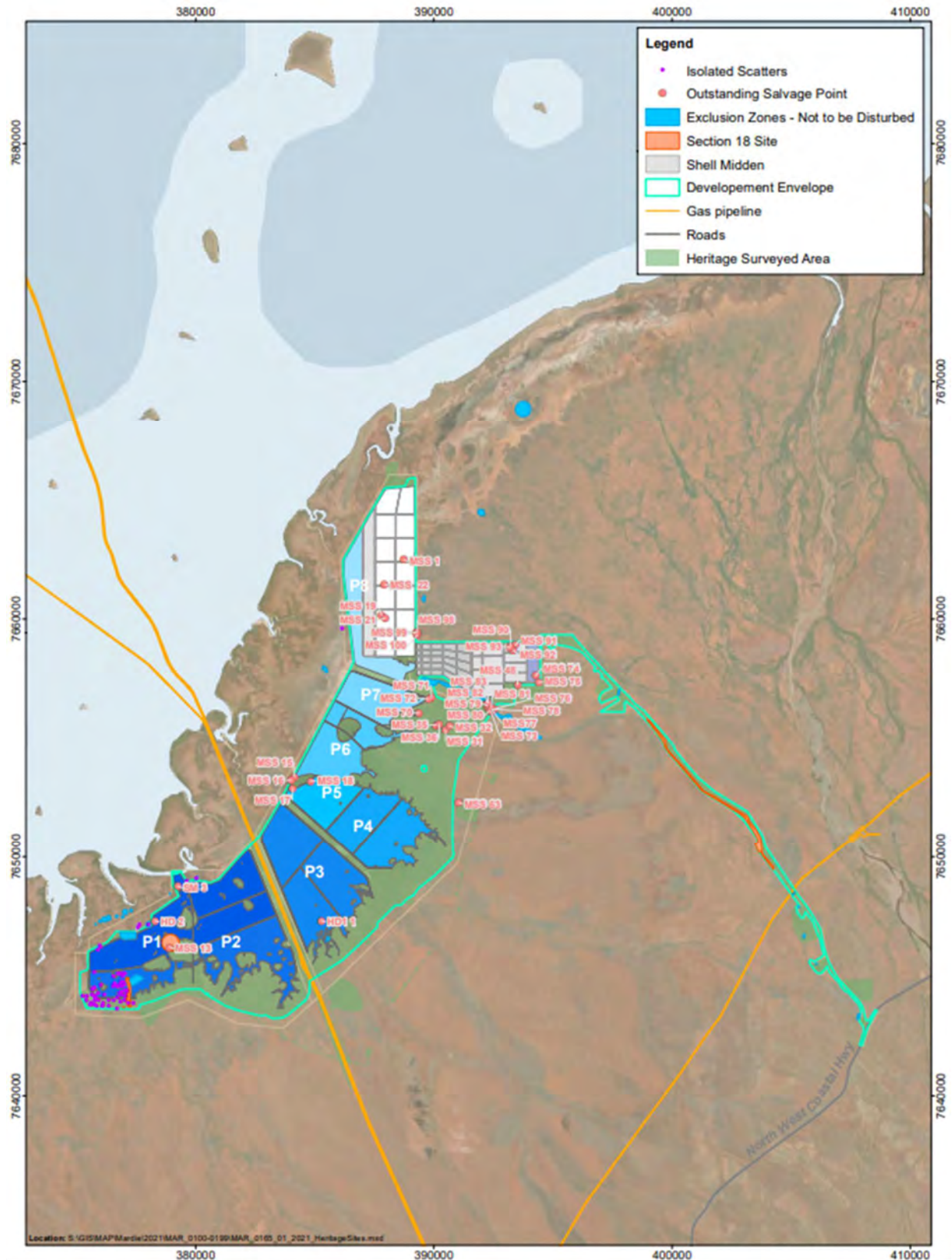


Figure 4: Mardie Salt Project - Heritage Status



10.3 Ground Disturbing Activities / Ground Disturbance Permit

Any party undertaking ground disturbing works must request and obtain a GDP from BCI. The Heritage Team will carry out an Aboriginal heritage impact assessment prior to determining any GDP conditions and prior to issuing the approved GDP.

The purpose of the GDP is to ensure BCI provides approval to Project Personnel to disturb land that will not breach obligations under relevant legislation, including the AHA and the other obligations discussed in this Plan.

The GDP will outline the relevant conditions and heritage procedures to be followed for each area of land subject to undertaking the ground disturbing activities.

10.4 Aboriginal Monitoring of Ground Disturbing Activities

In some areas of the Project, Aboriginal monitoring may be required during initial ground disturbing activities for highly significant cultural areas or areas not able to be heritage cleared due to dense vegetation. This will be managed as part of BCI’s ground disturbance process.

10.5 Archaeological Salvage

Archaeological salvage of heritage sites within the Project area may become an agreed mitigation strategy throughout the consultation and approval process for specific heritage places.

This will be managed as part of BCI’s ground disturbance process and is subject to obtaining any required approvals. The salvaging process includes recording the cultural material in situ, removing the cultural material within the proposed impact area relocating the cultural material in accordance with the agreed salvage methodology, either to a designated Keeping Place or an area outside of the construction footprint and recording the location the cultural material is relocated to.

Materials salvaged to date have been placed in keeping place locations throughout the site:

- Mardie Salt 03
- NS Road Keeping Place
- Mardie Creek Burial Site
- Island 5 (near Peters Creek)

All cultural material salvaged from the Project area will be relocated by, and in consultation with, the Traditional Owners. The status of salvaged heritage places is captured in Table 10 for YM and Table 11 for RRK, which also includes details of where materials have been relocated.

Table 10: Salvage Heritage Places – YM

SALVAGE ID	GPS CO-ORDINATES	ARTEFACT/COUNT	RELOCATION AREA
Mardie Salt Salvage Pt 1	388745 7662480	Artefacts	To be relocated
Mardie Salt Salvage Pt 2	394248 7658574	Artefacts	DPLH 6322 Mardie Creek Burial

SALVAGE ID	GPS CO-ORDINATES	ARTEFACT/COUNT	RELOCATION AREA
Mardie Salt Salvage Pt 3	394319 7658611	Artefacts	DPLH 6322 Mardie Creek Burial
Mardie Salt Salvage Pt 4	378248 7645915	34 artefacts	Island 5 near Peters Creek
Mardie Salt Salvage Pt 5	378405 7646501	18 artefacts	Island 5 near Peters Creek
Mardie Salt Salvage Pt 6	385955 7655458	Artefacts	Island 5 near Peters Creek
Mardie Salt Salvage Pt 7	394259 7657605	Artefacts	DPLH 6322 Mardie Creek Burial
Mardie Salt Salvage Pt 8	379383 7647605	7 artefacts	Island 5 near Peters Creek
Mardie Salt Salvage Pt 9	382403 7647977	7 artefacts	Island 5 near Peters Creek
Mardie Salt Salvage Pt 10	394136 7657635	Artefacts	DPLH 6322 Mardie Creek Burial
Mardie Salt Salvage Pt 11	381560 7648981	51 artefacts	Island 5 near Peters Creek
Mardie Salt Salvage Pt 12	378859 7645848	32 artefacts	Island 5 near Peters Creek
Mardie Salt Salvage Pt 13	378901 7646193	Artefacts	Section 18
Mardie Salt Salvage Pt 14	385967 7655476	Artefacts	Island 5 near Peters Creek
Mardie Salt Salvage Pt 15	384135 7653332	Artefacts	To be relocated
Mardie Salt Salvage Pt 17	384067 7652889	Artefacts	To be relocated
Mardie Salt Salvage Pt 18	384832 7653192	Artefacts	To be relocated
Mardie Salt Salvage Pt 19	387817 7660150	Artefacts	To be relocated
Mardie Salt Salvage Pt 20	377784 7645306	45 artefacts	Island 5 near Peters Creek
Mardie Salt Salvage Pt 21	387961 7660035	Artefacts	
Mardie Salt Salvage Pt 22	387913 7661469	Artefacts	To be relocated
Mardie Salt Salvage Pt 23	378693 7646740	14 artefacts	Island 5 near Peters Creek
Mardie Salt Salvage Pt 26 & 27	388972 7654876 389053 7654796	34 artefacts 2 balor shell fragments	DPLH 6322Mardie Creek Burial Site
Mardie Salt Salvage Pt 31	390491 7655334	Artefacts	To be relocated
Mardie Salt Salvage Pt 32	390665 7655507	Artefacts	To be relocated
Mardie Salt Salvage Pt 33	389662 7655197	Artefacts	DPLH 6322 Mardie Creek Burial Site
Mardie Salt Salvage Pt 34	389537 7655002	Artefacts	DPLH 6322 Mardie Creek Burial Site
Mardie Salt Salvage Pt 35	390096 7655536	Artefacts	To be relocated
Mardie Salt Salvage Pt 36	390216 7655583	Artefacts	To be relocated
Mardie Salt Salvage Pt 37	406245 7646648	Artefacts	Mardie Salt 03
Mardie Salt Salvage Pt 38	404992 7648666	Artefacts	Mardie Salt 03
Mardie Salt Salvage Pt 39	396734 7658144	Artefacts	DPLH 6322

SALVAGE ID	GPS CO-ORDINATES	ARTEFACT/COUNT	RELOCATION AREA
			Mardie Creek Burial Site (temporarily)
Mardie Salt Salvage Pt 42	406487 7645795	Artefacts	Mardie Salt 03
Mardie Salt Salvage Pt 48	393522 7657237	Artefacts	To be relocated
Mardie Salt Salvage Pt 53	403697 7650877	Artefacts	Mardie Salt 03
Mardie Salt Salvage Pt 54	402837 7652007	Artefacts	Mardie Salt 03
Mardie Salt Salvage Pt 55	402446 7652291	Artefacts	Mardie Salt 03
Mardie Salt Salvage Pt 70	389370 7656056	Artefacts	To be relocated
Mardie Salt Salvage Pt 71	389889 7656662	Artefacts	To be relocated
Mardie Salt Salvage Pt 72	389782 7656643	Artefacts	To be relocated
Mardie Salt Salvage Pt 73	392409 7656105	Artefacts	To be relocated
Mardie Salt Salvage Pt 74	394274 7657608	Artefacts	To be relocated
Mardie Salt Salvage Pt 75	394397 7657333	Artefacts	To be relocated
Mardie Salt Salvage Pt 76	392438 7656189	Artefacts	To be relocated
Mardie Salt Salvage Pt 77	392456 7656167	Artefacts	To be relocated
Mardie Salt Salvage Pt 79	392249 7656336	Artefacts	To be relocated
Mardie Salt Salvage Pt 80	392354 7656153	Artefacts	To be relocated
Mardie Salt Salvage Pt 81	392404 7656268	Artefacts	To be relocated
Mardie Salt Salvage Pt 82	392257 7656454	Artefacts	To be relocated
Mardie Salt Salvage Pt 83	392273 7656477	Artefacts	To be relocated
Mardie Salt Salvage Pt 90	393223 7658868	Artefacts	To be relocated
Mardie Salt Salvage Pt 91	393410 7658891	Artefacts	To be relocated
Mardie Salt Salvage Pt 92	393324 7658689	Artefacts	To be relocated
Mardie Salt Salvage Pt 93	393210 7658807	Artefacts	To be relocated
Mardie Salt Salvage Pt 98	389308 7659463	Artefacts	To be relocated
Mardie Salt Salvage Pt 99	389268 7659421	Artefacts	To be relocated
Mardie Salt Salvage Pt 100	389326 7659332	Artefacts	To be relocated

Table 11: Salvage Heritage Places – RRK

SALVAGE ID	GPS CO-ORDINATES	ARTEFACT COUNT	RELOCATION AREA
Getac 1 – WR:2	375989 7646283	3	To be relocated
Getac 1 – WR:4	375753 7645173	1	To be relocated
Getac 1 – WR:3	375695 7644474	2	To be relocated
Getac 1 – WR:4	375696 7644474	7	To be relocated
Getac 1 – WR:5	375696 7644474	1	To be relocated

Getac 1 – WR:6	375754 7644494	2	To be relocated
Getac 1 – WR:9	376970 7645117	5	To be relocated
Getac 1 – WR:12	376804 7645069	2	To be relocated
Getac 1 – WR:13	376804 7645069	1	To be relocated
Getac 1 – WR:14	376806 7645067	3	To be relocated
Getac 1 – WR:15	376801 7645069	Oyster Shell	To be relocated
Getac 1 – WR:16	376739 7645061	2	To be relocated
Getac 1 – WR:17	376556 7644985	1	To be relocated
Getac 1 – WR:1	375999 7646214	2	To be relocated
Getac 1 – WR:3	375883 7646069	8	To be relocated
Getac 1 – WR:7	376013 7644605	2	To be relocated
Getac 1 – WR:8	377008 7645060	5	To be relocated
Getac 1 – WR:10	376928 7644975	3	To be relocated
Getac 1 – WR:11	376804 7645069	2	To be relocated
July 2020 Isolated Artefacts Salvage	44 locations	80 artefacts	To be relocated

10.6 Demarcation of Heritage Sites

The outer perimeter of any heritage sites or places will be physically demarcated in the field to avoid any indirect disturbance. Individual demarcation requirements for each site/place are noted in Table 12 and shown in Figure 5.

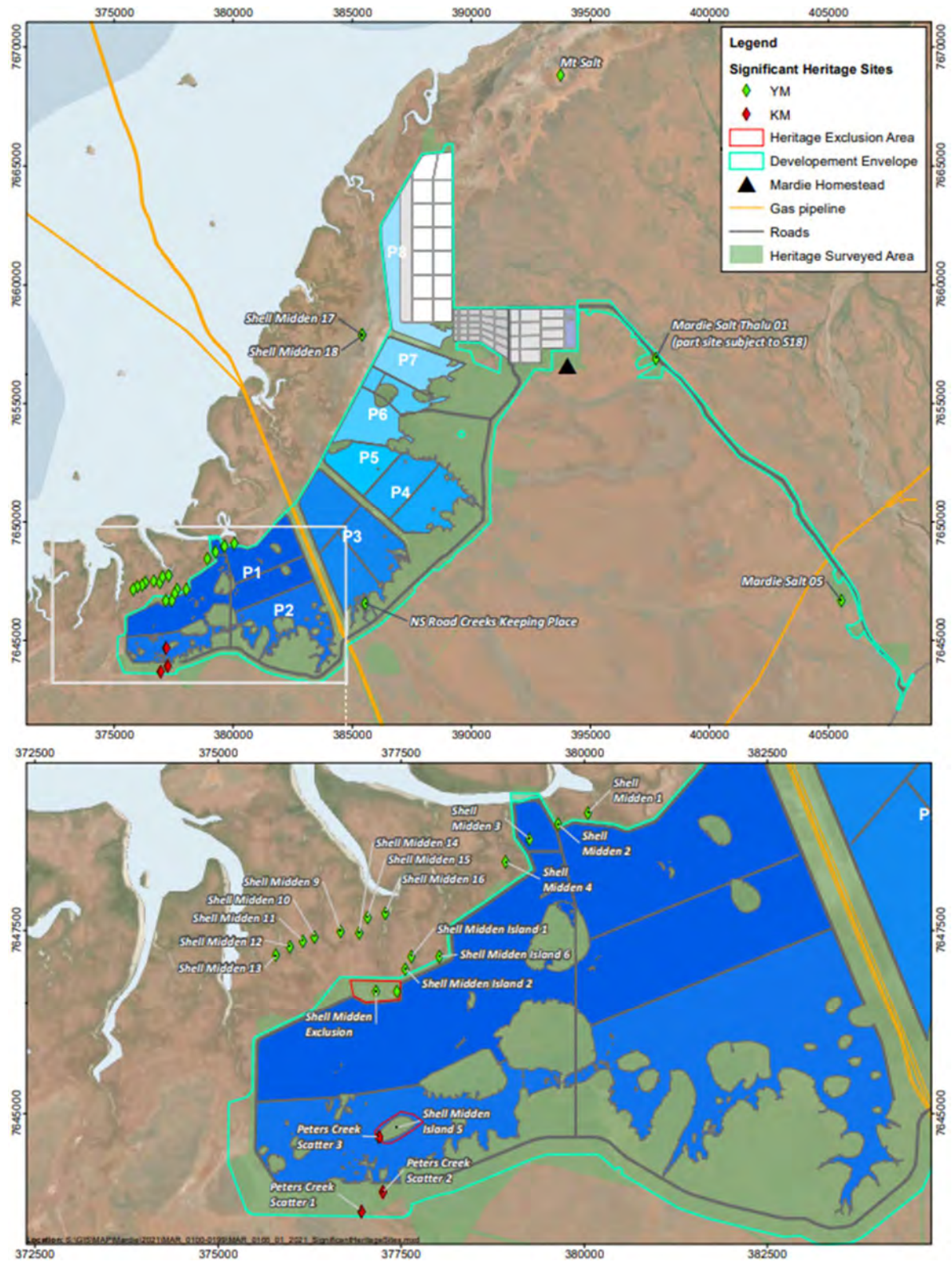
Table 12: Demarcation Sites

SITE ID	GPS CO-ORDINATES	RRK/YM
Peters Creek Scatter 1	376960 7643677	RRK
Peters Creek Scatter 2	377249 7643927	RRK
Peters Creek Scatter 3	377204 7644684	RRK
Shell Midden Island 1	377640 7647143	YM
Shell Midden Island 2	377559 7646977	YM
Shell Midden Island 5	377445 7646676	YM
Shell Midden Island 6	378023 7647142	YM
Shell Midden 1	380054 7649111	YM
Shell Midden 2	379642 7648956	YM
Shell Midden 3	379260 7648751	YM
Shell Midden 4	378929 7648435	YM
Shell Midden 6	378023 7647142	YM
Shell Midden 9	376673 7647492	YM
Shell Midden 10	376323 7647413	YM

Shell Midden 11	376163 7647358	YM
Shell Midden 12	375982 7647285	YM
Shell Midden 13	375790 7647156	YM
Shell Midden 14	376926 7647464	YM
Shell Midden 15	377039 7647670	YM
Shell Midden 16	377285 7647739	YM
Shell Midden 17	385432 7657887	YM
Shell Midden 18	385432 7657887	YM
Mt Salt	393750 7668835	YM
Shell Midden Exclusion	377158 7646676	YM
NS Road Creeks Keeping Place	385561 7646551	YM
Mardie Salt 05	405542 7646658	YM
Mardie Salt Thalu 01 (part site subject to s18)	397758 7656913	YM

Demarcation around heritage exclusion zones will be installed in accordance with BCI’s Demarcation and Survey Procedure (WIN-0000-CI-PRO-0001).

Figure 5: Demarcation Sites



10.7 Aboriginal Heritage Incidents

It is a breach of section 17 of the AHA to disturb or damage an Aboriginal site without prior section 18 Ministerial approval. No ground disturbing work in an Aboriginal heritage site should be conducted without having a GDP issued from BCI and having the appropriate heritage procedures in place.

In the event that inadvertent damage occurs to an Aboriginal heritage site within the Project area, the damaging activity will cease immediately and the following procedures will be followed:

- Work will cease and the Registered Manager will be contacted, and the area will be cordoned off with surveyors tape.
- The Registered Manager will contact the Heritage Team to assess the situation to determine the extent of impact and noncompliance.
- The Heritage Team will contact the DPLH and the Traditional Owner groups immediately.
- The incident will be dealt with and reported on according to BCI Incident Management System, using Incident Notification Form.
- The Heritage Team, along with the Registered Manager, will implement any recommendations or procedures as directed by the DPLH and the Traditional Owner groups.

No work is to be conducted in the area until the investigation is closed-out, and new procedures are in place, if required.

10.8 Discovery of Aboriginal Sites (Excluding Human Remains)

Whilst every effort has been undertaken to identify all Aboriginal heritage sites, there may be Aboriginal heritage sites within the project that have not been located either on the surface or subsurface. If cultural material is uncovered or identified, the incident reporting procedure detailed above must be followed along with the following considerations:

- The Heritage Team will contact the Prescribed Body Corporate which will engage Aboriginal monitors or an archaeologist (in its discretion) to assess the material and, among other things, determine whether the material constitutes a site as specified under section 5 of the AHA.
- The archaeologist will conduct the necessary site recording. If the material is determined to constitute a site, the Heritage Team will determine whether there is a section 18 consent in place to disturb heritage sites on that land.
- If the location of the site was subject to a section 18 approval, then the archaeologist along with the Aboriginal monitors will salvage and relocate material in accordance with salvage methodology.
- If the land in which the site is situated is not subject to a section 18 consent, then no work is to be conducted in the area until section 18 consent has been granted by DPLH.
- If the material is not determined to constitute a site under AHA definition, BCI and the Traditional Owner groups will cooperate to determine how to deal with the material.

10.9 Discovery of Human Remains

If human remains are uncovered at any stage during the development the incident reporting procedure detailed above must be followed along with the following considerations:

- The Registered Manager will contact the WA Police.

- The Registered Manager will contact the Head of Corporate Affairs and BCIs Heritage Team who will contact DPLH and the Traditional Owner Group/s. Aboriginal monitors and an archaeologist will be allowed on site with the police for consultation purposes.
- If the remains are decided to be historical Aboriginal, then determination of the procedure will be directed by DPLH and the Aboriginal stakeholders.
- If the remains are not historical Aboriginal, then direction from WA Police will be sought.
- No personnel are allowed to disturb, touch or alter in any way the human remains unless they have been authorised by WA Police or the DPLH.

10.10 Monitoring, Auditing and Reporting

BCI will conduct monitoring through a number of responsive and proactive methods including:

- BCIs ground disturbance process
- Site visits and inspections
- Field and desktop audits
- Community, employee or duty-holder advice

Annual audits of the level of compliance with this Plan will be conducted. This may include recommendations for follow up actions or changes where necessary to either improve auditability, accountability, compliance or address impracticalities of implementation.

The Heritage Team will be responsible for compiling the information for DPLH to satisfy the reporting conditions under each of the Section 18 approvals. This will be done in conjunction with the information provided by the relevant contractor undertaking ground disturbing works. Updates will be provided to the appropriate Traditional Owner groups at the same time it is provided to DPLH.

11. PLAN REVIEW BY IMPLEMENTATION COMMITTEE

Review of this Plan will be undertaken after the first year and then biannually by the Implementation Committee under the terms of each LAD unless otherwise agreed with WAC and RRKAC that a review is not required at that time. Reviews of this Plan will also be undertaken where there has been update to any core legislation as identified in Section 3.3. Any disputes regarding the management of Aboriginal heritage, or failure to comply with the Plan, will be dealt with by the relevant Implementation Committee and/or under the dispute resolution mechanisms of the LAD.

Copies of this Plan and any related procedures will be provided to the relevant Traditional Owner group in draft for their input and then in final as they are updated.

Opportunities will be made available for the Implementation Committee to undertake on country assessments during the regular committee meetings.

12. APPENDICES

12.1 Appendix A – Reference Documents

The following documents are available through the BCI INX/InControl system.

No.	Associated Documents	Document Number
1.	Licence to Operate Obligations Register	
2.	Ground Disturbance Procedure	BCI-ENV-PRO-001
3.	Demarcation and Survey Procedure	WIN-0000-CI-PRO-001
4.	Incident Reporting and Management Procedure	BCI-WHS-PR-009 Rev 0
5.	Incident Notification Form	BCI-WHS-FM-009 Rev A
6.	Aboriginal Heritage Management Guidelines for Contractors	MAR-PRJ-CPR-005

12.2 Appendix B - BCI Cultural Heritage Policy

Cultural Heritage Policy



BC Iron Limited (ASX: BCI) is an iron ore development and mining company with key assets in the Pilbara region of Western Australia. BC Iron is committed to protecting cultural heritage in areas where the company is conducting exploration and mining related activities during exploration, development, construction, operation and closure phases.

BC Iron is committed to forming meaningful partnerships with Traditional Owners on whose land our activities occur.

In relation to cultural heritage, we are committed to:

- Working with Aboriginal people and Traditional Owners to ensure all cultural heritage issues and activities are managed in a culturally appropriate and sensitive manner;
- Engaging and consulting with Aboriginal people and Traditional Owners during all phases of project development, implementation and closure;
- Working with Aboriginal people and Traditional Owners to develop strategic, sustainable business partnerships with BC Iron and other key stakeholders;
- Creating work places where Aboriginal people and Traditional Owners feel welcome and valued;
- Providing all employees and contractors with cross cultural awareness training in partnership with Aboriginal people and Traditional Owners;
- Consulting with Aboriginal people and Traditional Owners appropriately before all ground disturbing activities;
- Supporting Aboriginal people and Traditional Owners in the development and implementation of commercial and business opportunities; and
- Maintaining open communication with Aboriginal people and Traditional Owner Groups.

OUR CULTURAL HERITAGE RESPONSIBILITIES:

Leadership and adherence to the BC Iron Cultural Heritage Policy is the responsibility of all BC Iron employees and contractors. The Managing Director and Executive Management are accountable to the stakeholders for the development and implementation of this policy through the Environmental and Heritage Management System.



Morgan Ball
Managing Director

14th April 2015



12.3 Appendix C - Ground Disturbance Procedure

12.4 Appendix D - Demarcation and Survey Procedure

12.5 Appendix E - Aboriginal Heritage Management Guidelines for Contractors