



URBIS

# ABORIGINAL CULTURAL HERITAGE MANAGEMENT PLAN

Mulwala Solar Farm Stage 1b

Prepared for  
**EUROPEAN ENERGY**  
14 July 2025

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# CONTENTS

<b>1.</b>	<b>Introduction .....</b>	<b>5</b>
1.1.	Subject Area .....	5
1.2.	Project Background and Context .....	5
1.3.	Project Information .....	7
<b>2.</b>	<b>Purpose and Objectives .....</b>	<b>11</b>
2.1.	Purpose and Objectives .....	11
2.2.	Targets .....	11
<b>3.</b>	<b>Known Aboriginal Heritage .....</b>	<b>12</b>
	Aboriginal Sites within Subject Area .....	12
<b>4.</b>	<b>Regulatory requirements.....</b>	<b>14</b>
4.1.	Legislation .....	14
4.2.	Guidelines .....	14
4.3.	Conditions of Consent .....	14
<b>5.</b>	<b>Consultation .....</b>	<b>19</b>
5.1.	Ongoing Consultation .....	22
<b>6.</b>	<b>Requirements and Control measures .....</b>	<b>23</b>
6.1.	Surface collection.....	26
6.2.	Management of Artefacts.....	26
6.3.	Site avoidance and protective fencing .....	27
6.4.	Unexpected Finds Protocols .....	28
	6.4.1. Unexpected Finds.....	28
	6.4.2. Human Remains.....	28
<b>7.</b>	<b>Compliance .....</b>	<b>30</b>
7.1.	Inductions and training.....	30
7.2.	Inspections and monitoring .....	30
7.3.	Auditing .....	30
7.4.	Reporting .....	30
	7.4.1. Unexpected finds management.....	30
	7.4.2. Human remains management .....	31
	7.4.3. Incident and non-compliance reporting .....	31
	7.4.4. Document control .....	31
7.5.	Review and Improvement .....	31
	7.5.1. Continuous improvement .....	31
	7.5.2. Updates to this document.....	32
<b>8.</b>	<b>References .....</b>	<b>33</b>
	<b>Disclaimer.....</b>	<b>34</b>

## **Appendix A Development Plans**

## **Appendix B Registered Aboriginal Party Consultation - Updates**

## **FIGURES**

Figure 1 - Appendix 3 of the Conditions of Consent listing sites and required management .....	7
Figure 2 – Regional location of subject area .....	8
Figure 3 – Subject area .....	9
Figure 4 - Figure from Appendix 1 of the Conditions of Consent .....	10
Figure 5 – Overview of types of sites .....	18

Figure 6 – Management of AHIMS sites..... **Error! Bookmark not defined.**

## **TABLES**

Table 1 ACHA recommendations (RPS 2018) .....	13
Table 2 - Outline of CoC requirements and where these are addressed in this ACHMP .....	15
Table 3 Aboriginal heritage items listed in Table 1 and Table 2 of Appendix 3 of the CoC .....	16
Table 4 – RAP responses to the draft ACHMP .....	<b>Error! Bookmark not defined.</b>
Table 5 Requirements and control measures .....	23
Table 6 Fencing and buffers required for Aboriginal sites.....	27



# 1. INTRODUCTION

The Mulwala Solar Farm received approval on 18 December 2018 for the construction, operation and decommissioning of a utility-scale solar energy facility at Lot 1 DP100773, Lots 1-7 DP134511, Lot 103, 114-116, 125 & 132 DP752290, Savernake Road Mulwala NSW (the subject area) (Figure 1 and Figure 2). The proposed works will be staged. Stage 1 will include road upgrades at the intersection of Lambruck Lane and Savernake Road and site access points; construction of solar farm capable of producing up to 30MW(AC) of clean and renewable energy and substation.

- 1b:
  - Delivery of equipment and minor site establishment works, including installation of internal roads;
  - Construction of the northern portion of the solar farm;
  - Operation of the Mulwala Solar Farm.

The purpose of this Aboriginal Cultural Heritage Management Plan (ACHMP) is to address the requirements for the mitigation and management of impacts to Aboriginal objects and sites within the Stage 1b subject area, as outlined in the Environmental Impact Statement (EIS) (RPS 2018) and Conditions of Consent (CoC) from the NSW Minister for Planning for SSD-9039. The management plan will be updated as required to manage any future works under different approvals.

An Aboriginal Cultural Heritage Assessment (ACHA) (RPS 2018) was prepared for the project to support the EIS. The EIS summarised key findings of the ACHA, including potential impacts to Aboriginal objects or sites, and provided mitigation measures to minimise impacts, where possible.

The ACHA was undertaken in accordance with the requirements of regs. 60 and 61 of the *National Parks and Wildlife Regulation 2019* (NSW) and the following guidelines:

- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011b) ('the Assessment Guidelines').
- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010a) ('the Consultation Requirements')
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) ('the Code of Practice').

This ACHMP will be prepared with reference to these guidelines and regulations and will form part of the documentation for environmental management on site.

## 1.1. SUBJECT AREA

The combined subject area is located at Lot 1 DP100773, Lots 1-7 DP134511, Lot 103, 114-116, 125 & 132 DP752290, Savernake Road Mulwala NSW (the subject area) (Figure 2 and Figure 3). The subject area is approximately 650 kilometres southwest of Sydney and 100 kilometres west of Albury, NSW. It is within the boundaries of Federation LGA and Cummeragunja LALC.

## 1.2. PROJECT BACKGROUND AND CONTEXT

A Scoping Report was prepared and submitted in January 2018 with the request for Director General's Requirements (now known as Secretary's Environmental Assessment Requirements (SEARs)) under the Major Projects provisions of the *Environmental Planning and Assessment Act 1979*. The SEARs were issued in February 2018 and included the following requirements relevant to Aboriginal cultural heritage:

- *Heritage – including an assessment of the likely Aboriginal and historic heritage (cultural and archaeological) impacts of the development, including adequate consultation with the local Aboriginal community;*

In response to the above, an Aboriginal Cultural Heritage Assessment (ACHA) was prepared for the subject area (RPS 2018) to support an EIS. The assessment identified ten sites within the boundary, including eight that had been previously registered, and two that were recorded by RPS during the completion of the archaeological survey. Site types included scarred trees, artefacts, and resourcing and gathering sites. The report recommended that a programme of surface collection be employed for the artefact sites which were

within the impact footprint of proposed works, while the remaining sites were to be avoided, including the two scarred trees along Lambruck Lane. Further detail on the sites is provided in Section 4, while details on the management of the sites is provided in Section 7 of this report.

Approval for the solar farm was issued by DPHI in December 2018. The approval included the following requirements relating to Aboriginal heritage:

### **Protection of Heritage Items**

*17. The Applicant must ensure that the development avoids (as far as predictable) any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 3 (refer to Figure 1).*

*If impacts on these items cannot be avoided, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative on site, in accordance with the Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW (DECCW 2010) or its latest version.*

*Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 1 (refer to Figure 3).*

*18. The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 2 of Appendix 3 or located outside the approved development footprint.*

### **Discovery of Human Remains**

*19. If human remains are discovered on site, then all work surrounding the area must cease, and the area must be secured. The Applicant must notify the NSW Police and OEH as soon as possible following the discovery, and work must not recommence in the area until this is authorised by OEH.*

### **Chance Finds Protocol**

*20. Prior to commencing construction, the Applicant must prepare a Chance Finds Protocol for the development in consultation with the Aboriginal stakeholders, and to the satisfaction of OEH.*

*Following OEH's approval, the Applicant must implement the Chance Finds Protocol.*

### APPENDIX 3: ABORIGINAL HERITAGE ITEMS

**Table 1: Aboriginal heritage items – avoid impacts or salvage and relocate**

<i>Item</i>
55-4-260/55-4-0259
55-5-0139
55-5-0140

**Table 2: Aboriginal heritage items – avoid impacts**

<i>Item</i>
55-4-0261/55-4-0257
55-5-0138
55-4-0258
55-5-0132
55-5-0133
55-5-0134
55-5-0135

Figure 1 - Appendix 3 of the Conditions of Consent listing sites and required management

## 1.3. PROJECT INFORMATION

The Mulwala Solar Farm is a utility scale renewable energy development over two stages of project development. Stage 1b of the project will be comprised of solar photovoltaic modules, known more commonly as 'PV Modules' or "solar panels", and other approved associated infrastructure. The solar panels use the same type of technology as commonly used in residential solar installation throughout Australia but are larger in scale than those used in residential applications.

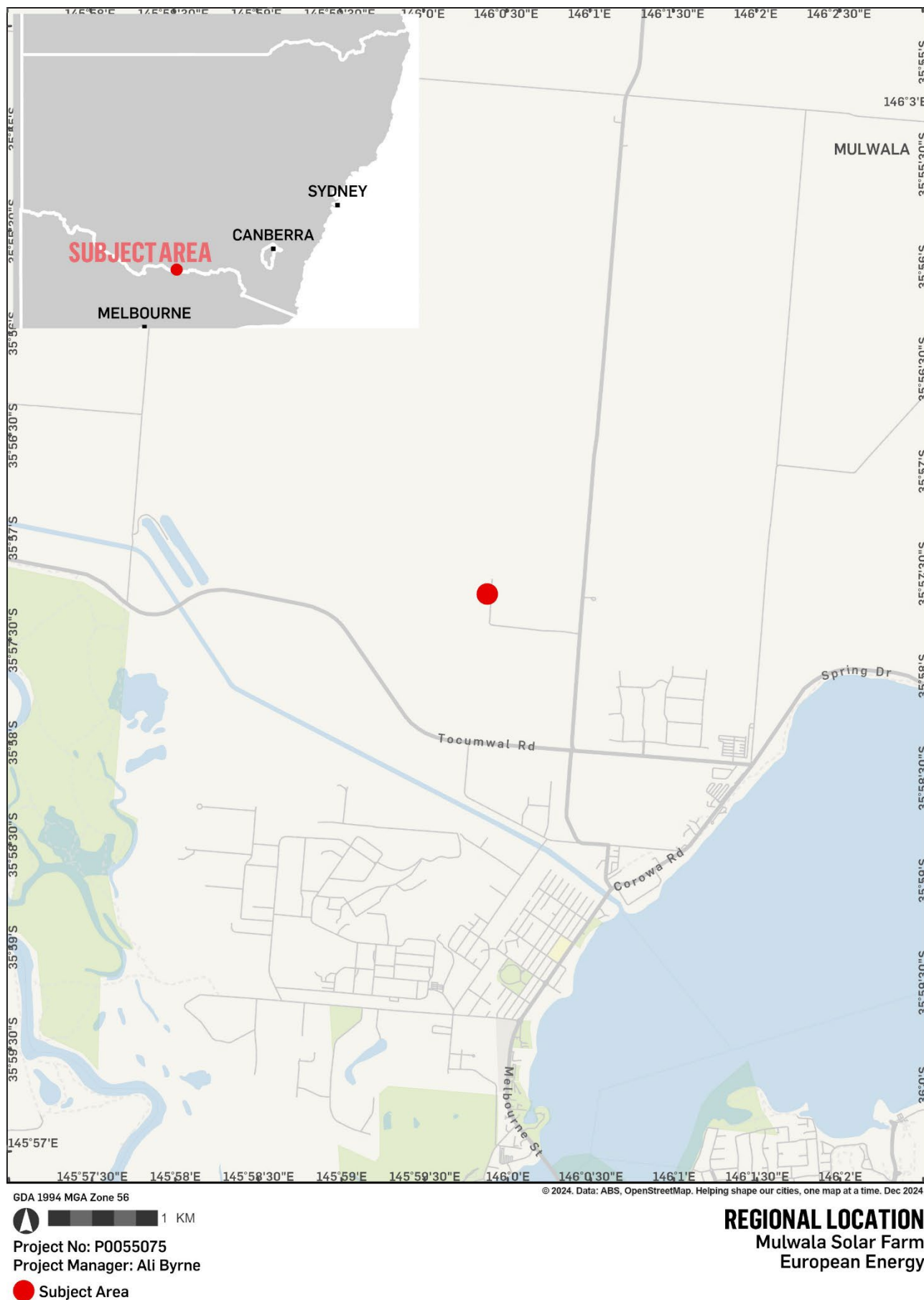


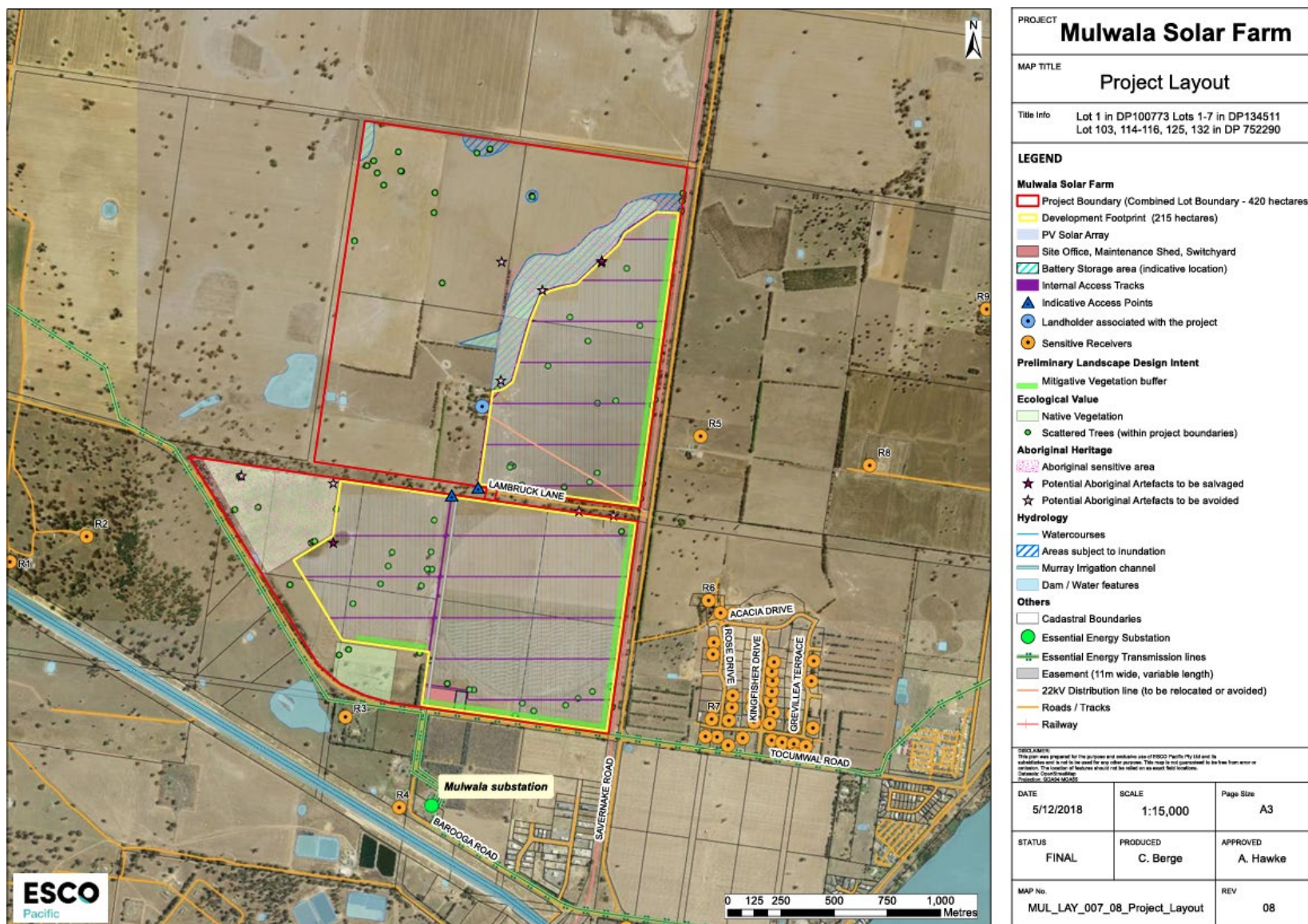
Figure 2 – Regional location of subject area





Figure 3 – Subject area





## **2. PURPOSE AND OBJECTIVES**

### **2.1. PURPOSE AND OBJECTIVES**

The purpose of this ACHMP is to outline the management and mitigation strategies with regard to harm that may occur to Aboriginal objects and sites within the subject area during construction, operation and decommissioning of the project. This is intended to prevent, minimise or offset adverse impacts to Aboriginal heritage and will inform the Environmental Management Strategy as required under Schedule 4 of the CoC.

The key objective of the document is to ensure that impacts to Aboriginal objects within the impact area are minimised and are within the scope authorised by the planning approval and CoC. This includes ensuring that the project is carried out in accordance with the Aboriginal cultural heritage recommendations set out in the EIS. To achieve this, the following will be undertaken:

- Ensure appropriate controls and procedures are implemented during the construction, operation and decommissioning activities for the solar farm and associated works, to avoid (where possible) or minimise impacts to Aboriginal objects within the approved development footprint.
- Ensure appropriate measures are implemented in accordance with the EIS and CoC, and any other relevant documents as well as regulations.
- Facilitate engagement with the local Aboriginal community to appropriately manage the cultural heritage values associated with the subject area.

### **2.2. TARGETS**

The following targets have been established for the ACHMP:

- Ensure and facilitate full compliance with relevant legislative requirements, and requirements of the EIS and CoC.
- Minimise and avoid impacts, including inadvertent impacts, on known Aboriginal objects and sites.
- Outline correct procedures, and facilitate the following of these procedures, for the management of Aboriginal objects and sites, and cultural heritage values, within the subject area.
- Ensure notification processes are in place for any previously unidentified Aboriginal objects or sites identified during the project.
- Ensure Aboriginal Cultural Awareness Training is provided to all on-site personnel in the form of an induction prior to working on site.

### 3. KNOWN ABORIGINAL HERITAGE

As part of the Environmental Impact Statement (EIS) for the Mulwala Solar Farm, RPS (2018) prepared an Aboriginal Cultural Heritage Assessment (ACHA) to identify Aboriginal objects and potential archaeological sites within the project area. The assessment was conducted in compliance with the National Parks and Wildlife Act 1974, the Heritage Act 1977, and the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010). The findings are summarised below with ten sites identified, including two culturally modified trees and eight isolated artefacts.

The archaeological survey, conducted by RPS archaeologists in collaboration with representatives from the Cummeragunja Local Aboriginal Land Council, Bundyi Aboriginal Cultural Knowledge, and the Bangerang Aboriginal Corporation, identified ten Aboriginal sites within the project area. The survey methodology included a thorough inspection of landforms such as sandy rises, vehicle tracks, and low-lying swamp areas, which were identified as having high archaeological sensitivity. These areas were prioritised due to their resource richness and potential cultural significance. The sites are shown in Figure 5.

#### Aboriginal Sites within Subject Area

- **Site 55-4-0261/55-4-0257:** This site contains a single quartz artefact with retouch evidence. Visibility was moderate due to grass cover and track disturbance. Located on a sandy vehicle access track parallel to Lambruck Lane (Easting: 409343, Northing: 6020057).
- **Site 55-4-0260/55-4-0259:** This site included a singular silcrete artefact, discovered on disturbed red sand near Survey Unit 2.
- **Site 55-4-0258:** Positioned in Survey Unit 3, associated with the low-lying swamp. This site contained a singular stone flake.
- **Site 55-5-0139:** A singular quartz angular fragment was found in Survey Unit 3 close to the swamp area.
- **Site 55-5-0140:** A singular quartz angular fragment was found in sandy rises near the swamp area in Survey Unit 3.
- **Site 55-5-0132 and Site 55-5-0133:** Two modified trees were recorded outside the development footprint. Positioned within no-go zones near Survey Unit 2, these trees display evidence of scarring.
- **Site 55-5-0138:** A singular quartz angular fragment recovered on the surface. Thick grasses cover the site with few areas of visibility. There are vehicle and livestock tracks visible throughout the area.
- **Site 55-5-0134:** An Aboriginal resource and gathering area south of the swamp in Survey Unit 3. This site is notable for the presence of Nardoo, a culturally significant plant used for food preparation.
- **Site 55-5-0135:** A singular stone artefact. No information is provided by the site card in regard to associated landscape features.

The ACHA highlighted the significance of these sites, emphasising the importance of the project area as a resource-rich zone historically used by Aboriginal groups. Despite the low-density artefact distribution and the overall impact of agricultural activities on the landscape, the presence of these sites reflects the cultural and historical value of the area. The findings align with broader regional studies, which indicate that Aboriginal groups often occupied areas near water sources or sand dunes for subsistence activities.

The report assessed the potential impacts of the solar farm construction on these heritage sites. Three of the identified sites, including isolated artefact scatters and part of the PAD, fall within the development footprint and would be directly impacted by construction activities. The remaining seven sites, including the modified trees and significant cultural sites, are located within designated no-go zones to ensure their protection. The report recommended several mitigation measures, including the establishment of exclusion zones with high-visibility fencing, the conduction of a surface salvage operation for sites within the development footprint, and cultural heritage inductions for construction personnel to ensure legal compliance and awareness.

In addition, the ACHA included protocols for managing unexpected finds, including skeletal remains, during construction. If new Aboriginal objects were discovered, all works in the immediate area must cease, and relevant authorities and RAPs would be notified to assess and manage the discovery appropriately. These measures aimed to ensure that all Aboriginal heritage within the project area is managed in accordance with legislation and cultural sensitivities.



The recommendations of the ACHA prepared for the project (RPS 2018), which inform the CoC are outlined in Table 1 below.

Table 1 ACHA recommendations (RPS 2018)

Recommendation
1. There are four no-go zones established within the project area. The large no-go zones harbour sensitive landforms. The two smaller no-go zones harbour scarred trees. The no-go zones are to be marked out with high visibility fencing prior to commencement of works. No works will take places within no-go zones. All staff and subcontractors are to be made aware of the no -go zone locations and to avoid them at all times.
2. AHIMS sites 55-4-0258, 55-4-0261/55-4-0257, 55-5-0134 and 55-5-0135 are located within the no-go zones. No works will take place within these areas. These sites will not be impacted. There are no mitigation of management measures for these sites due to their position within the no-go zone. All staff and subcontractors are to be made aware of the no -go zone locations and to avoid them at all times. No harm is to come to AHIMS sites 55-4-0258, 55-4-0261/55-4-0257, 55-5-0134 and 55-5-0135.
3. AHIMS sites 55-5-0132 and 55-5-0133 are located outside the development footprint and within a no-go zone. These sites will not be impacted. The mitigation measure for these sites is the installation of high visibility fencing extending from the edge of the formed access track, Lambruck Lane to the northern-most fence line of the southern portion of the project area. All staff and subcontractors are to be made aware of the no -go zone locations and to avoid them at all times. No harm is to come to AHIMS sites 55-5-0132 and 55-5-0133.
4. AHIMS site 55-5-0138 is located outside of the development footprint and therefore will not be impacted. There are no mitigation or management measures for this site.
5. Prior to any site work commencing, a surface salvage of AHIMS sites 55-4-260/55-4-0259, 55-5-0140 and 55-5-0139 must occur as these sites are within the proposed development footprint. After the surface salvage, an Aboriginal Site Impact Recording Form must be completed and submitted to AHIMS.
6. All relevant personnel, contractors and subcontractors must be made aware of the legal obligations for Aboriginal cultural heritage under the NPW Act through an on-site toolbox talk or induction prior to works commencing.
7. If any unrecorded Aboriginal objects are identified while undertaking the proposed development activities in the Project Area, then all works in the immediate area must cease and the area should be cordoned off and secured and the proponents must avoid further harm to the Aboriginal object. OEH (now Heritage NSW) must be notified via the Enviroline 131 555 as soon as practicable providing details of the Aboriginal object/s and the site location. The RAPs are to be notified along with the heritage consultant to ensure the site is assessed and managed. Works must not recommence at that particular location unless authorised by OEH.
8. In the unlikely event that skeletal remains are identified, work must cease in the immediate vicinity of the remains and the area must be cordoned off. The proponent must contact the local NSW Police who will make an initial assessment as to whether the remains are part of a crime scene or possible Aboriginal remains. If the remains are thought to be Aboriginal, OEH must be contacted via the Enviroline 131 555. An OEH officer will determine if the remains are Aboriginal or not; and a management plan must be developed in consultation with the relevant Aboriginal stakeholders before works recommence. Works must not recommence at that location unless authorised in writing by OEH.
9. The proposed works within the project area will not impact on any known historic (non-Aboriginal) objects or places. Works may proceed with caution.
10. All relevant personnel, contractors and subcontractors must be made aware of the legal obligations for historic (non-Aboriginal) heritage under the NSW <i>Heritage Act 1977</i> through an on-site toolbox talk or induction prior to works commencing
11. If suspected archaeological resources are identified, work within the affected area must cease and the area cordoned off. The Heritage Division of OEH (now Heritage NSW) must be notified by ringing the Enviroline on 131 555 so that it can be adequately assessed and managed in accordance with Section 146 of the Heritage Act. The heritage consultant is to be notified.

## **4. REGULATORY REQUIREMENTS**

### **4.1. LEGISLATION**

Key legislation relevant to the management of Aboriginal heritage for this project includes:

- National Parks and Wildlife Act 1974 (NSW) (NPW ACT)
- National Parks and Wildlife Regulation 2019
- Environmental Planning and Assessment Act 1979 (NSW) (EP&A Act)

### **4.2. GUIDELINES**

There are no guidelines specifically geared towards the preparation of an ACHMP in NSW, however this document has been prepared with reference to other relevant guidelines, including:

- Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW (OEH 2011)
- Code of Practice for Archaeological Investigation of Aboriginal objects in New South Wales (DECCW 2010)
- Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010)

### **4.3. CONDITIONS OF CONSENT**

The CoC were issued by the NSW Minister for Planning on 18 December 2018. Details of the conditions relevant to Aboriginal heritage (Conditions 17, 18, 19 and 20 of Schedule 3) are provided in Table 2.

The CoC also states that the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development (Schedule 2, Condition 1). This includes Aboriginal heritage. This document is intended to ensure compliance.

Table 2 - Outline of CoC requirements and where these are addressed in this ACHMP

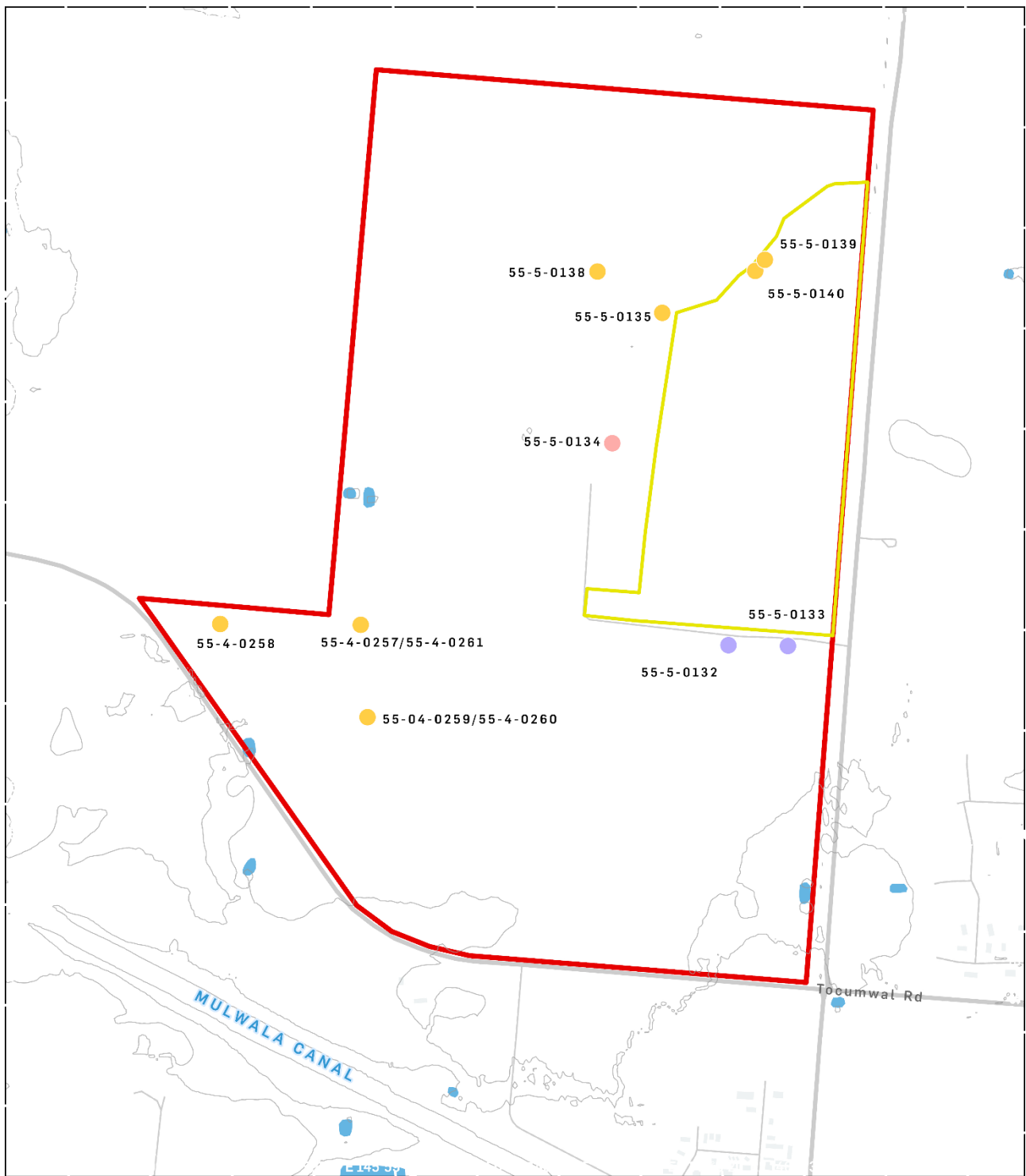
Condition of Consent	Report Section	When to implement	Responsibility
<p>17. The Applicant must ensure that the Development avoids (as far as practicable) any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 3.</p> <p>If impacts on these items cannot be avoided, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location on site, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW 2010), or its latest version.</p> <p><i>Note: the location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 1.</i></p>	Sections 6.1 7.1,	Pre-construction	Project archaeologist, Project manager, Site manager, RAPs
<p>18. The Applicant must ensure the development does not cause and direct or indirect impacts on the Aboriginal heritage items identified in Table 2 of Appendix 3 or located outside the approved development footprint.</p>	Section 6.2 7.1	Pre-construction	Project archaeologist, Project manager, Site manager
<p>19. If human remains are discovered on site, then all work surrounding the area must cease, and the area must be secured. The Applicant must notify the NSW Police and OEH [now Heritage NSW] as soon as possible following the discovery, and work must not recommence in the area until this is authorised by OEH.</p>	Section 6.3.2	Pre-construction Construction Operations/ Maintenance Decommissioning	Site manager, Project archaeologist, RAPs
<p>20. Prior to commencing construction, the Applicant must prepare a Chance Finds Protocol for the development in consultation with the Aboriginal stakeholders, and to the satisfaction of OEH.</p> <p>Following OEH's approval, the Applicant must implement the Chance Finds Protocol.</p>	Section 6.3.1	Pre-construction Construction Operations/ Maintenance Decommissioning	Site manager, Project archaeologist, RAPs

The Aboriginal heritage items referred to in Schedule 3, Condition 17 and 18 of the CoC are listed below in Table 3 and shown in Figure 5.

Table 3 Aboriginal heritage items listed in Table 1 and Table 2 of Appendix 3 of the CoC

Site number	Site name	Site type	CoC	Figure	Management measures
55-4-0260/55-4-0259	Mulwala Isolated Artefact 2	Artefact	Avoid impacts or salvage and relocate	5	This site is located within the proposed development footprint and may be directly impacted through the construction and installation of the proposed solar farm. If impacted, mitigation of harm to this site will be done through surface salvage prior to construction work.
55-5-0139	Mulwala Isolated Artefact 4	Artefact	Avoid impacts or salvage and relocate	5	This site is located within the proposed development footprint and may be directly impacted through the construction and installation of the proposed solar farm. Mitigation of harm to this site will be done through surface salvage prior to construction work.
55-5-0140	Mulwala Isolated Artefact 3	Artefact	Avoid impacts or salvage and relocate	5	This site is located within the proposed development footprint and may be directly impacted through the construction and installation of the proposed solar farm. If impacted, mitigation of harm to this site will be done through surface salvage prior to construction work.
55-4-0261/55-4-0257	Mulwala Isolated Artefact 1	Artefact	Avoid impacts	5	This site is located outside of the proposed development footprint and within a no-go zone. This site will not be directly impacted by the proposed solar farm development.
55-5-0138	Mulwala Isolated Artefact 5	Artefact	Avoid impacts	5	This site is located outside of the proposed development footprint and therefore will not be directly impacted by the proposed solar farm development. There are no mitigation or management measures for this site.

Site number	Site name	Site type	CoC	Figure	Management measures
55-4-0258	Lambruk 408916	Artefact	Avoid impacts	5	This site is located outside of the proposed development footprint and within a no-go zone. This site will not be directly impacted by the proposed solar farm development.
55-5-0132	Lambruk 410464	Modified Tree	Avoid impacts	5	This site is located outside of the proposed development footprint and therefore will not be directly impacted by the proposed solar farm development. Management of potential harm to this site throughout the construction process will be done through a no-go zone established through high visibility fencing.
55-5-0133	Lambruk 410649	Modified Tree	Avoid impacts	5	This site is located outside of the proposed development footprint and therefore will not be directly impacted by the proposed solar farm development. Management of potential harm to this site throughout the construction process will be done through a no-go zone established through high visibility fencing
55-5-0134	Lambruk 410145	Resource and Gathering	Avoid impacts	5	This site is located outside of the proposed development footprint and within a no-go zone. This site will not be directly impacted by the proposed solar farm development.
55-5-0135	Lambruk 410324	Artefact	Avoid impacts	5	This site is located outside of the proposed development footprint and within a no-go zone. This site will not be directly impacted by the proposed solar farm development.



GDA 1994 MGA Zone 56

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1 KM

Project No: P0055075  
Project Manager: Ali Byrne

## AHIMS SITES IN PROXIMITY

Mulwala Solar Farm  
European Energy

- |  |   |
|--|---|
| <span style="border: 2px solid red; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> Subject Area             | <span style="color: yellow; font-size: 1.2em; margin-right: 5px;"></span> Artefact                        |
| <span style="background-color: lightblue; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> Hydrology          | <span style="color: purple; font-size: 1.2em; margin-right: 5px;"></span> Modified Tree                   |
| <span style="border-bottom: 1px solid gray; display: inline-block; width: 20px; margin-right: 5px;"></span> Contours                       | <span style="color: pink; font-size: 1.2em; margin-right: 5px;"></span> Aboriginal Resource and Gathering |
| <span style="border: 2px solid yellow; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> Development Footprint |   |

Figure 5 – Overview of types of sites

## 5. CONSULTATION

Condition 20 of Schedule 3 requires that the Aboriginal stakeholders be consulted on the preparation of the “Chance Finds Protocol”. It is also expected that this plan would be provided to the Registered Aboriginal Parties (RAPs) for their review, prior to approval by Heritage NSW.

The ACHAR (RPS 2018) for the project completed consultation in accordance with Clause 60 of the NPW Regulation and following the steps outlined in the *Aboriginal cultural heritage consultation requirements for proponents*.

Three Aboriginal organisations/individuals registered for this project:

- Cammergunja Local Aboriginal Land Council
- Bundyi Aboriginal Cultural Knowledge
- Bangerang Aboriginal Corporation

All three RAPs were invited to participate in the fieldwork for this project.

For this ACHMP, additional consultation was undertaken with the RAPs, with the draft ACHMP provided for their comment on 14 April 2025. No comments were received. Follow up phone calls were made in late May, however of the three organisations, only Bundyi Culture was contactable.

The comments in Table 4 were provided by Bundyi Culture. Documentation is provided in Appendix B.

The ACHMP was provided to Heritage NSW on 20 May 2025, and again on 13 June 2025 and comments received have been incorporated into the report. The HNSW responses are also provided in Appendix C.

Table 4 RAP comments

Registered Aboriginal Party	Comments	Urbis Response
Bundy Culture	<p><i>The Wiradjuri and Bangerang peoples hold a profound connection to the land, one that spans countless generations. Their cultural practices, oral histories, and spiritual traditions are deeply intertwined with the area, forming a rich tapestry of heritage that speaks to their enduring relationship with the environment. Sacred sites, traditional knowledge, and stories passed down through elders reflect their stewardship and reverence for the natural world, as well as their identity and belonging to this region. This special connection to country underscores the significance of recognizing and preserving their cultural heritage in all aspects of development and engagement.</i></p> <p><i>Cultural Immersion Programs</i>  <i>All staff, contractors, and proponents involved in the Mulwala Solar Farm project are required to undertake Wiradjuri cultural immersion programs. These programs will be delivered by a local knowledge holder who possesses a TAE Certificate IV in training and assessment. The programs aim to foster deep respect and understanding of Wiradjuri and Bangerang cultural practices and histories.</i></p> <p><i>Signage and Recognition</i>  <i>To respect the cultural significance of the land, signs will be erected at all access points to the project site. These signs will inform visitors and workers that they are entering Wiradjuri/Bangerang Country. Such signage will serve as a daily reminder of the land's importance and promote awareness among all stakeholders.</i></p> <p><i>Preservation of Habitat</i>  <i>Crown land access roads within the project area host essential trees, shrubs, and plants that provide habitats for native animals and birds. These ecological elements are to be safeguarded against removal in alignment with environmental conservation practices. Protecting these habitats demonstrates the project's commitment to both biodiversity and the cultural value of the natural environment.</i></p>	<p>Thank you for your response.</p> <p>Urbis notes that the management of Aboriginal objects including unexpected finds procedures and long term management of artefacts is consistent with the contents of this management plan.</p> <p>With regard to the employment of Aboriginal people, this is outside the scope of this document and would be at the discretion of the proponent and contractors.</p> <p>The cultural immersion program is supported however is recommended to be limited to the site manager and/or environmental manager for reasons of practicality.</p>



Registered Aboriginal Party	Comments	Urbis Response
	<p><i>Repatriation Site for Aboriginal Items</i></p> <p><i>A dedicated onsite location will be established for the repatriation of all Aboriginal items that have already been recovered and for those that may still be unearthed during the project. This site will be managed respectfully and will be pivotal in ensuring the preservation of significant cultural artifacts.</i></p> <p><i>Due Diligence and Unexpected Finds Procedures</i></p> <p><i>Robust procedures for due diligence and unexpected finds must be integrated into all planning and design phases of the project. These procedures will ensure that any cultural artifacts or heritage elements discovered during the project's execution are handled appropriately, in consultation with Aboriginal representatives. All staff, contractors and land holders must be understanding of these processes and their responsibilities to protect country and culture.</i></p> <p><i>Prioritising Local Aboriginal Employment</i></p> <p><i>The proponents of the Mulwala Solar Farm project are urged to embed contractual agreements that prioritize the employment and training of local Aboriginal people. This initiative will support the economic empowerment of Aboriginal communities and foster their active participation throughout the project's duration. Quality skill sets and training must also be provided.</i></p> <p><i>Cultural Awareness for Local Government</i></p> <p><i>The Corowa Local Government Council should also partake in cultural awareness a training as well, so as to deepen their understanding of Wiradjuri and Bangerang heritage. This training will enhance collaboration between the council and Aboriginal groups, ensuring the project's alignment with cultural values.</i></p>	

## 5.1. ONGOING CONSULTATION

In accordance with Condition 20 of Schedule 3 and with this ACHMP, consultation with the RAPs will be ongoing during implementation of this plan. Consultation with the RAPs will generally be provided in writing via email (or mail if email unavailable) by the Project's representative, or their consultant. All consultation with RAPs must be recorded in a log to ensure auditable compliance.

Consultation during pre-construction will include:

- Provision of information regarding completion of any onsite work including placing of fencing in no-go areas, surface collection/salvage work and unexpected finds. The dates that this will be undertaken will be provided in writing to all RAPs approximately two weeks prior to completion.
- Invitations to selected RAPs to attend onsite works to be provided approximately two weeks prior to completion.
- Notification of completion of onsite work to be provided to all RAPs within approximately two weeks of completion.
- Provision of any reporting, such as salvage report, to all RAPs once finalised.

During construction:

- Provision of information regarding any change in the status or condition of sites which require monitoring in accordance with this ACHMP.
- Consultation with RAPs in the event of unexpected finds to be provided as a notification in writing. Site visits will be arranged as necessary:
  - RAPs will be consulted in the event of unexpected finds, including human remains;
  - Consultation will give RAPs the opportunity to provide cultural knowledge to inform the assessment of significance for, and provide input into the proposed management of, any unexpected finds.

During the above, and through operation:

- ACHMP to be revised as needed, as site condition/s and requirements change, including following completion of surface collection/salvage works, fencing, and unexpected finds.

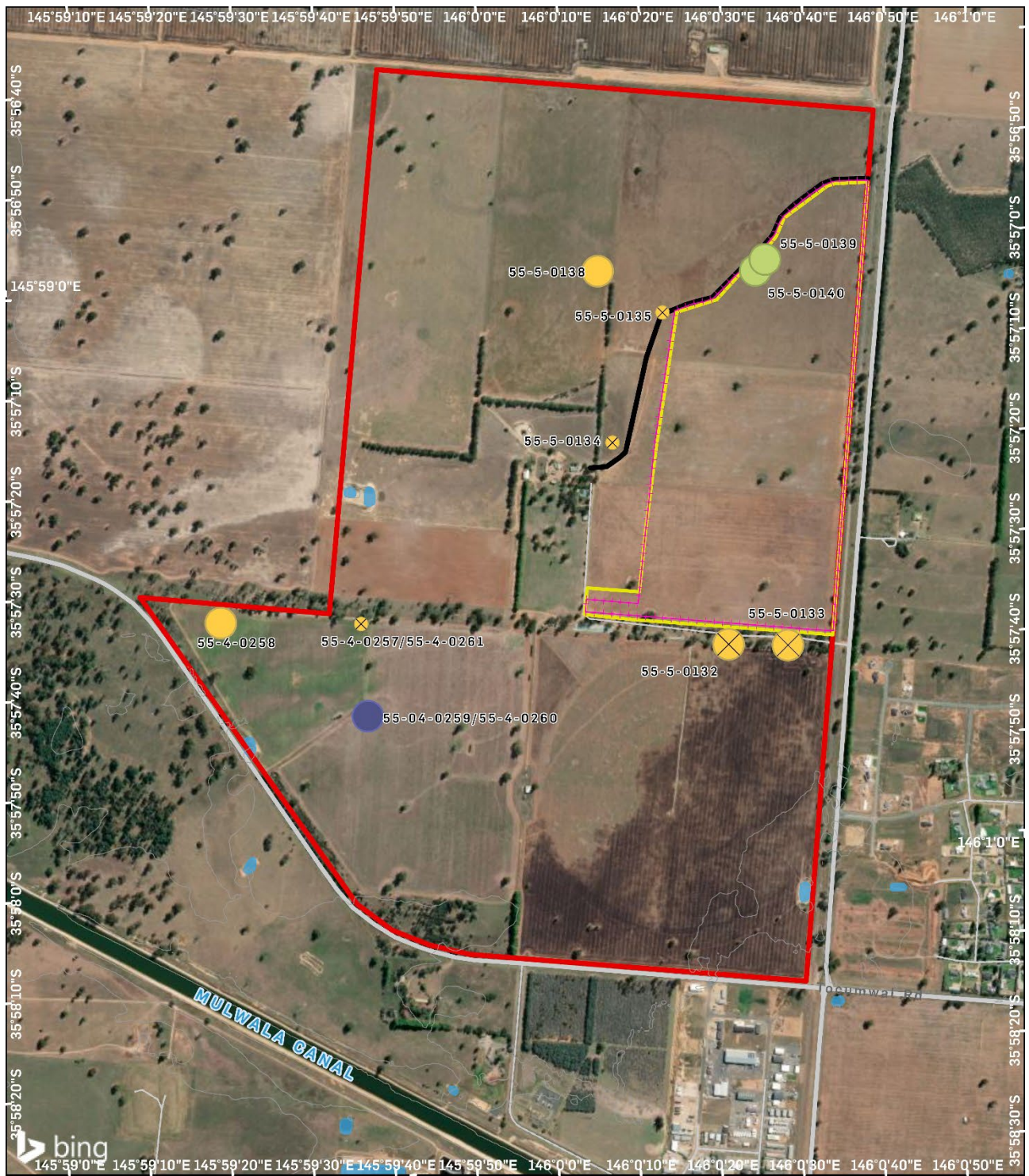
## 6. REQUIREMENTS AND CONTROL MEASURES

The mitigation and management measures outlined in the ACHA (RPS 2018) (Table 1) and the CoC (Table 2), Table 5 below provides an outline of the requirements based on these recommendations and practical requirements for site management.

Table 5 Requirements and control measures

Requirement	When required	Who is responsible	Documentation
Establish no go zones (Recommendation 1, RPS 2018)	Prior to construction commencing.	Site manager/project manager, Project archaeologist	This ACHMP Site condition to be checked in accordance with Section 7.2
Avoid 55-4-0258, 55-4-0261/55-4-0257, 55-5-0134 and 55-5-0135 (Recommendation 2, RPS 2018) Install temporary fencing around 55-4-0261/55-4-0257, 55-5-0134 and 55-5-0135, due to proximity to impact area (Table 3, Urbis 2024)	Prior to construction commencing.	Site manager/project manager, Project archaeologist	This ACHMP Site condition to be checked in accordance with Section 7.2
Avoid and install fencing around 55-5-0132 and 55-5-0133 (Recommendation 3, RPS 2018).	Prior to construction commencing.	Site manager/project manager, Project archaeologist	This ACHMP Site condition to be checked in accordance with Section 7.2
Avoid 55-5-0138 (Recommendation 4, RPS 2018). (Table 3, Urbis 2024)	Project lifetime – including decommissioning. All new staff and contractors	Site manager/project manager, all staff	This ACHMP Site condition to be checked in accordance with Section 7.2
Surface salvage of AHIMS 55-4-260/55-4-0259 if future stages proceed. Surface salvage of 55-5-0140 and 55-5-0139, and completion/submission of Aboriginal Site Impact Recording Form (Recommendation 5, RPS 2018) (Table 3, Urbis 2024)	Prior to construction commencing.	Project archaeologist	This ACHMP Salvage report to be prepared ASIRF to be submitted to AHIMS
Toolbox talk or induction for all onsite personnel, staff and contractors. (Recommendation 6, RPS 2018) (Table 3, Urbis 2024)	Project lifetime – including decommissioning.	Site manager/project manager,	This ACHMP Environmental Management Strategy

Requirement	When required	Who is responsible	Documentation
	All new staff and contractors		
Unexpected finds protocol for Aboriginal objects (Recommendation 7, RPS 2018) (Table 3, Urbis 2024)	Project lifetime – including decommissioning. All new staff and contractors	Site manager/project manager, all staff	This ACHMP Environmental Management Strategy
Human remains protocol (Recommendation 8, RPS 2018) (Table 3, Urbis 2024)	Project lifetime – including decommissioning. All new staff and contractors	Site manager/project manager, all staff	This ACHMP Environmental Management Strategy



GDA 1994 MGA Zone 56

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1 KM

Project No: P0055075  
Project Manager: Ali Byrne

## MANAGEMENT REQUIREMENTS

Mulwala Solar Farm  
European Energy

- |   |   |   |  |
|---|---|---|--|
| <span style="border: 2px solid red; display: inline-block; width: 20px; height: 10px;"></span> Subject Area | <span style="border-bottom: 2px solid black; width: 20px;"></span> No-Go Zone         | <span style="background-color: #90EE90; border-radius: 50%; width: 15px; height: 15px;"></span> Surface Collection                      | Site Avoidance and Protective Fencing  |
| <span style="background-color: #ADD8E6; border-radius: 50%; width: 15px; height: 15px;"></span> Hydrology   | <span style="border-bottom: 2px dashed pink; width: 20px;"></span> Protective Fencing | <span style="background-color: #FFD700; border-radius: 50%; width: 15px; height: 15px;"></span> Site Avoidance                          | <span style="border: 2px solid yellow; width: 15px; height: 15px; display: flex; align-items: center; justify-content: center;">X</span> 5m Buffer Zone                    |
| <span style="border-bottom: 2px solid yellow; width: 20px;"></span> Development Footprint                   |   | <span style="background-color: #4169E1; border-radius: 50%; width: 15px; height: 15px;"></span> Stage 1: Avoid (future stages: salvage) | <span style="border: 2px solid yellow; width: 15px; height: 15px; display: flex; align-items: center; justify-content: center;">X</span> Tree Dripline Buffer (5m minimum) |

Figure 6 – Management requirements

## 6.1. SURFACE COLLECTION

There are three (3) sites which require surface collection:

- AHIMS 55-4-0139 “Mulwala Isolated Artefact 4” (Stage 1b)
- AHIMS 55-5-0140 “Mulwala Isolated Artefact 3” (Stage 1b)
- AHIMS 55-4-0259/0260 “Mulwala Isolated Artefact 2” (Future Stage/s)

A methodology for the completion of the surface collection has been included in order to ensure compliance with the relevant requirements. During the surface collection, the opportunity to examine the immediate surrounds of the recorded sites to identify any other artefacts which may be present within the approved development footprint should be taken. This will be undertaken by the archaeology team, consisting of the project archaeologist/s and representatives of the RAPs.

The surface collection will be undertaken as follows:

- Use a handheld GPS to identify the original location of the recorded site.
- Undertake transect survey across landform, within development footprint, to identify recorded artefact, and any additional artefacts which may be within the impact area
- Use pin flags to mark out locations of any artefacts observed.
- Photograph site area once flagging is completed.
- GPS plot artefact locations. Where artefact densities are unexpectedly high, 2x2m gridding can be used to record artefact locations.
- Photograph artefacts individually or in groups of up to five (5).
- Collect artefacts, bag and label in accordance with location, by individual number of location grid, with project number, date, and relevant artefact details, including quantity.
- Recording of stone artefacts will be conducted in line with standard archaeological practice to include raw material, type, dimensions, and any other characteristics considered relevant, consistent with Requirement 19 in the Code of Practice.

This document is to be updated when these works are completed.

## 6.2. MANAGEMENT OF ARTEFACTS

The Conditions of Consent indicate that ‘relocation’ of the artefacts is to be completed in accordance with the Code of Practice. Requirement 26 of the Code of Practice provides the following direction regarding ‘stone artefact disposition and storage’. Artefacts will be stored at Urbis until the below is completed.

*For Aboriginal objects kept or returned to the location they originated from:*

- A full catalogue, including photographic and drawn records for diagnostic stone artefacts, must be made.
- The catalogue must be in printed form but may also include an electronic database in the form of a table containing all records.
- All stone artefacts must be either individually bagged or bagged in appropriate and identifiable units (e.g. excavation or collection units) that can be referenced back to the catalogue.
- The stone artefacts must be stored in good quality, double-bagged plastic zip-lock bags.
- The bags must be externally labelled using permanent marker, and an ‘independent’ label on robust material (e.g. tyvek) written with permanent marker must be placed inside each bag.
- The collection must be placed in a suitable impervious and permanent container, which must be labelled as above, or engraved. 35 Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW
- A full record of the final location of the collection must be made, including:

- grid coordinates derived as set out in Requirement 8
  - a site plan or mud map referring to permanent features
  - depth of burial, if buried
  - full photographic record of the disposition.
- The record must be submitted to AHIMS with a site update record card for the site(s) in question.

An Aboriginal Site Impact Recording Form would be completed for each site.

The location proposed for the burial of the recovered artefacts needs to be agreed upon by the RAPs, landowner and Proponent (if different), and project archaeologist; it must be located where no impacts are expected in the long term and will be registered on the AHIMS database as a site. This location will be fenced for the duration of the project, including construction, operation and decommissioning.

A report will be prepared outlining the completion of all the above works. This report will be provided to the RAPs for their information, and to Heritage NSW for their records. This ACHMP must also be updated and a copy of the post salvage report be kept with the updated version.

### 6.3. SITE AVOIDANCE AND PROTECTIVE FENCING

There are seven (7) registered sites which are located within the subject area, but will not be within the impact zone of the proposal, and the Conditions of Consent require that the project avoid harm to these sites:

- AHIMS 55-4-0261/55-4-0257 “Mulwala Isolated Artefact 1”
- AHIMS 55-5-0138 “Mulwala Isolated Artefact 5”
- AHIMS 55-4-0258 “Lambruck 408916”
- AHIMS 55-5-0132 “Lambruck 410464”
- AHIMS 55-5-0133 “Lambruck 410649”
- AHIMS 55-5-0134 “Lambruck 410145”
- AHIMS 55-5-0135 “Lambruck 410324”

Of these sites, AHIMS 55-5-0138 “Mulwala Isolated Artefact 5” and AHIMS 55-4-0258 “Lambruck 408916” are located at a safe distance from the proposed zone of works and can remain as they are. They must still be included in on-site inductions for all staff and contractors, to ensure no inadvertent impact occurs, for example as a result of vehicle movement.

The remaining sites are located close to paper boundary of the proposed impact area, and it is expected that fencing may be required to ensure no harm during construction, and likely through operation/maintenance and decommissioning.

Fencing should include placement of either water-filled barrier or metal mesh fencing panels at buffers around the identified sites, as below. If this cannot be achieved for reasons of practicality, barrier mesh with star pickets may be suitable, in discussion with the project archaeologist and RAPs. For sites which cannot be fenced for practical reasons, the construction contractors must be made aware of areas that must be avoided.

Table 6 Fencing and buffers required for Aboriginal sites

Site number / site type	Buffer required
55-4-0261/55-4-0257 / Isolated find	5m
55-5-0138 / Isolated find	n/a
55-4-0258 / Isolated find	n/a
55-5-0132 / Scarred tree	To the dripline of the tree (minimum 5m buffer)
55-5-0133 / Scarred tree	To the dripline of the tree (minimum 5m buffer)



Site number / site type	Buffer required
55-5-0134 / Resource and gathering	5m
55-5-0135 / Isolated find	5m

## 6.4. UNEXPECTED FINDS PROTOCOLS

Unexpected Finds Protocols for archaeological remains, as well as human remains, have been provided below in accordance with the CoCs. These have been updated from the original protocols provided in the ACHA, in order to remain in line with current accepted process.

### 6.4.1. Unexpected Finds

Unexpected finds may include:

- Aboriginal objects
- Remains of historical structures or land use

If any archaeological deposits or features are unexpectedly discovered during any site works, the following steps must be carried out:

1. All works within the vicinity of the find must immediately stop. The find must not be moved 'out of the way' without assessment. The find must be cordoned-off and signage installed to avoid accidental impact.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
3. The RAPs will be contacted and informed about the unexpected find.
4. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. The RAPs will be given the opportunity to attend the site with the archaeologist. Such management may require further consultation with Heritage NSW, preparation of a research design and archaeological investigation/salvage methodology and notification of the discovery of an Aboriginal object to Heritage NSW in accordance with the *National Parks and Wildlife Act 1974*. Significance will be determined in consultation with the RAPs.
5. Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
6. Reporting may need to be prepared regarding the find and approved management strategies.
7. Works in the vicinity of the find would only recommence upon receipt of approval from Heritage NSW.

### 6.4.2. Human Remains

Should clearly identifiable human remains be uncovered anywhere within the subject site, the following procedure should be implemented:

1. All works within the vicinity of the find must immediately stop. The find must be cordoned-off and signage installed to avoid accidental impact.
2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555).
3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
5. Where the human remains are determined to be Aboriginal ancestral remains, the RAPs will be informed of the find and given the opportunity to attend site. Management of the site will be formulated in consultation with the RAPs.
6. Works are not to recommence until the find has been appropriately managed:



- 6.1. Where the remains are found to be recent, instructions from the NSW Police will be followed;
- 6.2. Where the remains are found to be Aboriginal ancestral remains, these will be managed in accordance with the wishes of the RAPs. This is likely to include leaving the remains in place and providing a respectful buffer zone around the location;
- 6.3. Where the remains are historical (non-Aboriginal) in origin, these would be managed in accordance with Heritage NSW advice including archaeological excavation, exhumation and re-burial in a suitable cemetery.

In the event that bones are uncovered which may be human but cannot be confirmed by onsite staff, a suitably qualified archaeologist or heritage specialist should be contacted in the first instance to determine how to proceed.

## **7. COMPLIANCE**

Section 7 outlines the roles and responsibilities for all relevant staff and contractors with regard to the management of Aboriginal cultural heritage at Mulwala Solar Farm.

### **7.1. INDUCTIONS AND TRAINING**

To ensure compliance by all onsite staff and contractors, and all actions required by this ACHMP are adequately implemented, the Site Supervisor or other relevant on-site staff member in charge of managing environmental safety will coordinate with all relevant contacts in order to ensure that inductions outlining the responsibilities of individuals and companies with regard to the management and protection of Aboriginal objects.

This will include noting no-go areas and environmental management zones in which Aboriginal objects are located, which must be avoided, as well as reporting procedures for unexpected finds.

### **7.2. INSPECTIONS AND MONITORING**

Periodic inspection of the sites which are to be avoided by the project should be completed as follows:

- Prior to construction
- Fortnightly during construction for sites within 50m of works
- Post-construction
- Every 5 years during operation
- At any time when an incident or near miss occurs in proximity to a site, which has the potential to impact the integrity of the site
- Upon decommissioning.

A record of these inspections must be kept and any breaches will be reported to the Environment Line 131 555.

### **7.3. AUDITING**

Audits of the Environmental Management Strategy (EMS) (as required by the CoC Schedule 4) must include an audit to ensure measures outlined in this ACHMP have been appropriately implemented and maintained. Aboriginal heritage must be included within any independent Environmental audit as noted in the CoC.

Auditing requirements as outlined in the EMS must be followed.

### **7.4. REPORTING**

The Site Manager or other relevant on-site supervisor is responsible for ensuring that all reporting requirements in accordance with this ACHMP are met, including reporting on site condition and audit results, as well as unexpected finds and database updates.

#### **7.4.1. Unexpected finds management**

In the event that previously unknown Aboriginal objects, or other heritage items are uncovered during the life of the project, the Unexpected Finds Protocol provided in Section 6.4 of this management plan must be followed.

Where impacts to the unexpected find are found to be covered within the existing approval, the site will be salvaged in accordance with the process outlined in Section 6.1.

For newly identified Aboriginal objects, a site card will be prepared and submitted to AHIMS. Impacts to the site will be recorded by submission of an Aboriginal Heritage Impact Recording Form.

## 7.4.2. Human remains management

In the event that clearly identifiable human remains are identified during any works or operation of the site, all activity in the area must cease and the NSW Police must be notified immediately. The Unexpected Human Remains Protocol provided in Section 6.4 must be followed.

Where bone considered possibly human is identified, a suitably qualified archaeologist or anthropologist should be contacted to examine the bone/s. If the consultant confirms the bone is likely to be human, then the Unexpected Human Remains protocol must be followed.

## 7.4.3. Incident and non-compliance reporting

In the definitions provided in the CoC, an incident is defined as “A set of circumstances that causes or threatens to cause material harm to the environment”; a non-compliance is defined as “an occurrence, set of circumstances or development that is a breach of the consent, but is not an incident.”

Examples of these for Aboriginal heritage would be as follows:

- An incident would include impact to known or unexpected Aboriginal objects or sites during construction, operation, maintenance or decommissioning.
- A non-compliance would include failure to update reporting in accordance with the CoC and this document.

Compliance reporting must be undertaken in accordance with CoC Schedule 4 clauses 4, 5 and 6, which are provided verbatim below.

### **Incident Notification**

4. The Department must be notified in writing to [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au) immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident.

### **Non-Compliance Notification**

5. The Department must be notified in writing to [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au) within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this consent. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.

### **Compliance Reporting**

6. The Applicant must provide regular compliance reporting to the Department on the development in accordance with the relevant Compliance Reporting requirements (DPE 2018).

## 7.4.4. Document control

The most up to date version of this ACHMP must be kept on file on site for the life of the project, from construction to decommissioning.

## 7.5. REVIEW AND IMPROVEMENT

### 7.5.1. Continuous improvement

Continuous improvement of this ACHMP will be achieved by the ongoing evaluation of performance against all policies and targets within this document. Improvements may be made to this document only after approval from DPHI and/or Heritage NSW.

Improvements may occur where areas for improvement of the plan are identified as a result of non-compliance or incidents, or where other deficiencies are identified.

### **7.5.2. Updates to this document**

This ACHMP may be updated to remain in conformity with the EMS for the project. Changes must be approved by DPHI and/or Heritage NSW. Updates may occur as a result of the following:

- Updates as a result of completion of surface collection and fencing works on site.
- Updates to maps for the subject area to include information relevant to the above dot point.
- Addressing any requested amendments from DPHI and/or Heritage NSW as a result of other reporting, reviewing or auditing undertaken for the project.
- Following an incident or non-compliance, as relevant.
- Where the CoC is subject to a Modification which includes changes to control measures for Aboriginal cultural heritage.
- Updates where future works are proposed under additional approvals.

Updated versions of this document will be provided to the Registered Aboriginal Parties. Where cultural heritage management policies or processes have changed, a 14-day responses period will be provided to RAPs.

## 8. REFERENCES

Australia ICOMOS Incorporated 2013, *The Burra Charter, The Australia ICOMOS Charter for Places of Cultural Significance*

Department of Environment Climate Change and Water (DECCW) 2010a, *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*

DECCW 2010b, *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*

DECCW 2010c, *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*

*Environmental Planning and Assessment Act 1979*

*Environment Protection and Biodiversity Conservation Act 1999*

*Heritage Act 1977 (NSW)*

*National Parks and Wildlife Act 1974*

*National Parks and Wildlife Regulation 2019*

OEH 2011b, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*

# DISCLAIMER

This report is dated 14 July 2025 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of European Energy (**Instructing Party**) for the purpose of an Aboriginal Cultural Heritage Management Plan (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

**APPENDIX A**

**DEVELOPMENT PLANS**



# MULWALA SOLAR FARM - STAGE 1

## DETAIL SITE PLAN

PLOT STYLE: URBIS\_A1.ctb

PAGE SETUP: ....

PLOTTED BY: ALEX FREEMAN

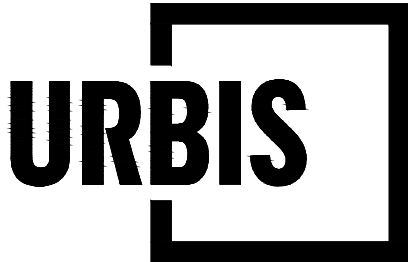
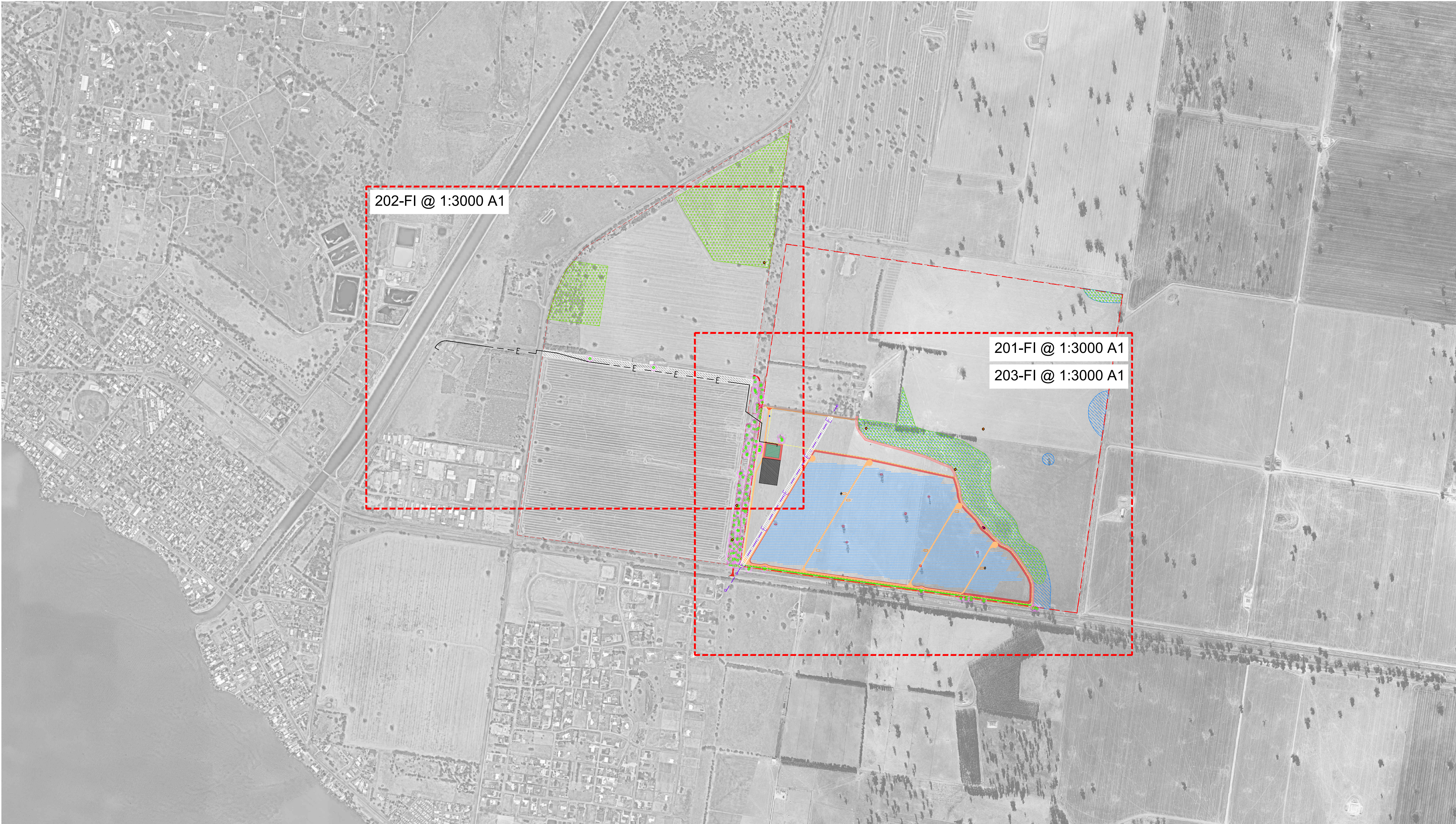
PLOT DATE: 09.04.2025

PATH: \\02-project\p005075\_mulwala\_solar\_farm\04\03\_documentation\01\_CAD\03\_layout\001\_CS - Cover Sheet.dwg

INDICATIVE PROJECT DETAILS	
SECURE FENCED AREA	68.4ha
SECURITY FENCING LENGTH	3,997m
GATES	1
DC CAPACITY	TBC
AC CAPACITY	TBC
2-STRING TRACKER TABLES	22
3-STRING TRACKER TABLES	35
4-STRING TRACKER TABLES	420
PV PANELS	51,212
PITCH	7.7m

### GENERAL LEGEND

	STAGE 1 PROJECT BOUNDARY - 215ha
	DEVELOPMENT FOOTPRINT - COMBINED 420ha
	FENCING - SECURITY
	AREAS SUBJECT TO INUNDATION - TO BE AVOIDED WITH 10M OFFSET
	AREAS OF ECOLOGICAL VALUE - TO BE AVOIDED WITH 10M OFFSET
	4M INTERNAL ACCESS ROADS - REFER TO ENGINEERING DRAWINGS
	EXTERNAL ACCESS UPGRADES - REFER TO ENGINEERING DRAWINGS
	EXTERNAL ACCESS ROADS - TO BE UTILISED
	SUBSTATION & O&M BUILDINGS - REFER TO ENGINEERING DRAWINGS
	TEMPORARY LAYDOWN AREA - DURING CONSTRUCTION ONLY
	INVERTERS - REFER TO ENGINEERING DRAWINGS
	TRANSMISSION LINE EASTMENT - TO BE AVOIDED
	EXISTING TRANSMISSION LINE TOWERS - TO BE AVOIDED
	EXISTING TRANSMISSION LINE - TO BE AVOIDED
	INDICATIVE TRANSMISSION LINE ROUTE - SUBJECT TO SEPARATE REF PATHWAY
	5M VEGETATED SCREENING - REFER TO LANDSCAPE STRATEGY
	EXISTING NATIVE TREES RETAINED (MARKED EXTENTS INCLUDE TP2) - TO BE PROTECTED DURING WORKS
	EXISTING TREES - TO BE REMOVED
	2-STRING TRACKER TABLES (22) - 56 PANELS PER TABLE
	3-STRING TRACKER TABLES (35) - 84 PANELS PER TABLE
	4-STRING TRACKER TABLES (420) - 112 PANELS PER TABLE



#### PROJECT

MULWALA SOLAR FARM  
STAGE 1  
255 SAVERNAKE ROAD  
MULWALA, NEW SOUTH WALES, 2647

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REV	DESCRIPTION	DWN	CHK	DATE
E	FOR REVIEW	AF	PY	09.04.2025
D	FOR REVIEW	AF	PY	17.03.2025
C	FOR REVIEW	AF	PY	27.02.2025
B	FOR REVIEW	AF	PY	13.02.2025
A	FOR REVIEW	AF	SD	10.02.2025
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PROJECT DIRECTOR: CLARE BROWN

CLIENT  
**EUROPEAN ENERGY**  
----

DRAWING TITLE  
**COVER SHEET**

ISSUE  
FOR REVIEW  
SCALE

1:10,000 @ A1  
1:20,000 @ A3  
100 200 300 400 500m

DRAWING NO.  
**001-CS**

PROJECT NO.  
P0055075

NORTH



REVISION

E



PLOT STYLE: URBIS\_A1.ctb

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PLOTTED BY: ALEX FREEMAN

PLOT DATE: 09.04.2025

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INDICATIVE PROJECT DETAILS	
SECURE FENCED AREA	68.4ha
SECURITY FENCING LENGTH	3.997m
GATES	1
DC CAPACITY	TBC
AC CAPACITY	TBC
2-STRING TRACKER TABLES	22
3-STRING TRACKER TABLES	35
4-STRING TRACKER TABLES	420
PV PANELS	51,212
PITCH	7.7m

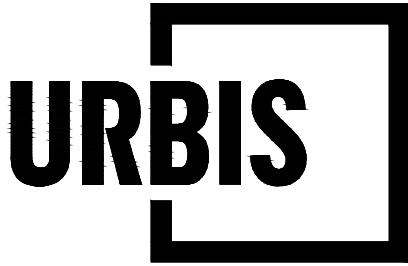
GENERAL LEGEND

- STAGE 1 PROJECT BOUNDARY  
- 219ha
- DEVELOPMENT FOOTPRINT  
- COMBINED 420ha
- FENCING - SECURITY
- AREAS SUBJECT TO INUNDATION  
- TO BE AVOIDED WITH 10M OFFSET
- AREAS OF ECOLOGICAL VALUE  
- TO BE AVOIDED WITH 10M OFFSET
- NO-GO ZONE  
- INCLUSIVE OF OFFSET REQUIREMENTS
- 10M ASSETT PROTECTION ZONE  
- TO BE MAINTAINED WITH 10M CLEARING
- 4M INTERNAL ACCESS ROADS  
- REFER TO ENGINEERING DRAWINGS
- EXTERNAL ACCESS UPGRADES  
- REFER TO ENGINEERING DRAWINGS
- EXTERNAL ACCESS ROADS  
- TO BE UTILISED
- SUBSTATION & O&M BUILDINGS  
- REFER TO ENGINEERING DRAWINGS
- TEMPORARY LAYDOWN AREA  
- DURING CONSTRUCTION ONLY
- INVERTERS  
- REFER TO ENGINEERING DRAWINGS
- EXISTING TL EASTMENT  
- TO BE AVOIDED
- EXISTING TRANSMISSION LINE TOWERS  
- TO BE AVOIDED
- EXISTING TRANSMISSION LINE  
- TO BE AVOIDED
- INDICATIVE TRANSMISSION LINE ROUTE  
- SUBJECT TO SEPARATE REF PATHWAY
- 5M VEGETATED SCREENING  
- REFER TO LANDSCAPE STRATEGY
- EXISTING NATIVE TREES  
(MARKED EXTENTS INCLUDE TP2)  
- TO BE RETAINED AND PROTECTED
- EXISTING TREES  
- TO BE REMOVED AT STAGE 1
- GATE
- 45,000L WATER TANK & HARDSTAND AREA
- POTENTIAL ABORIGINAL ARTEFACT  
- TO BE SALVAGED PRIOR TO WORKS
- POTENTIAL ABORIGINAL ARTEFACT  
- TO BE AVOIDED DURING WORKS
- MET STATION  
- REFER TO ENGINEERING DRAWINGS

2-STRING TRACKER TABLES (22)  
- 56 PANELS PER TABLE

3-STRING TRACKER TABLES (35)  
- 84 PANELS PER TABLE

4-STRING TRACKER TABLES (420)  
- 112 PANELS PER TABLE



PROJECT

MULWALA SOLAR FARM

STAGE 1

255 SAVERNAKE ROAD  
MULWALA, NEW SOUTH WALES, 2647

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A	FOR REVIEW	AF	SD	10.02.2025
-	FOR REVIEW	AF	-	04.02.2025

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PROJECT DIRECTOR: CLARE BROWN

CLIENT  
EUROPEAN ENERGY  
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DRAWING TITLE  
SITE PLAN - STAGE 1

ISSUE  
FOR REVIEW  
SCALE

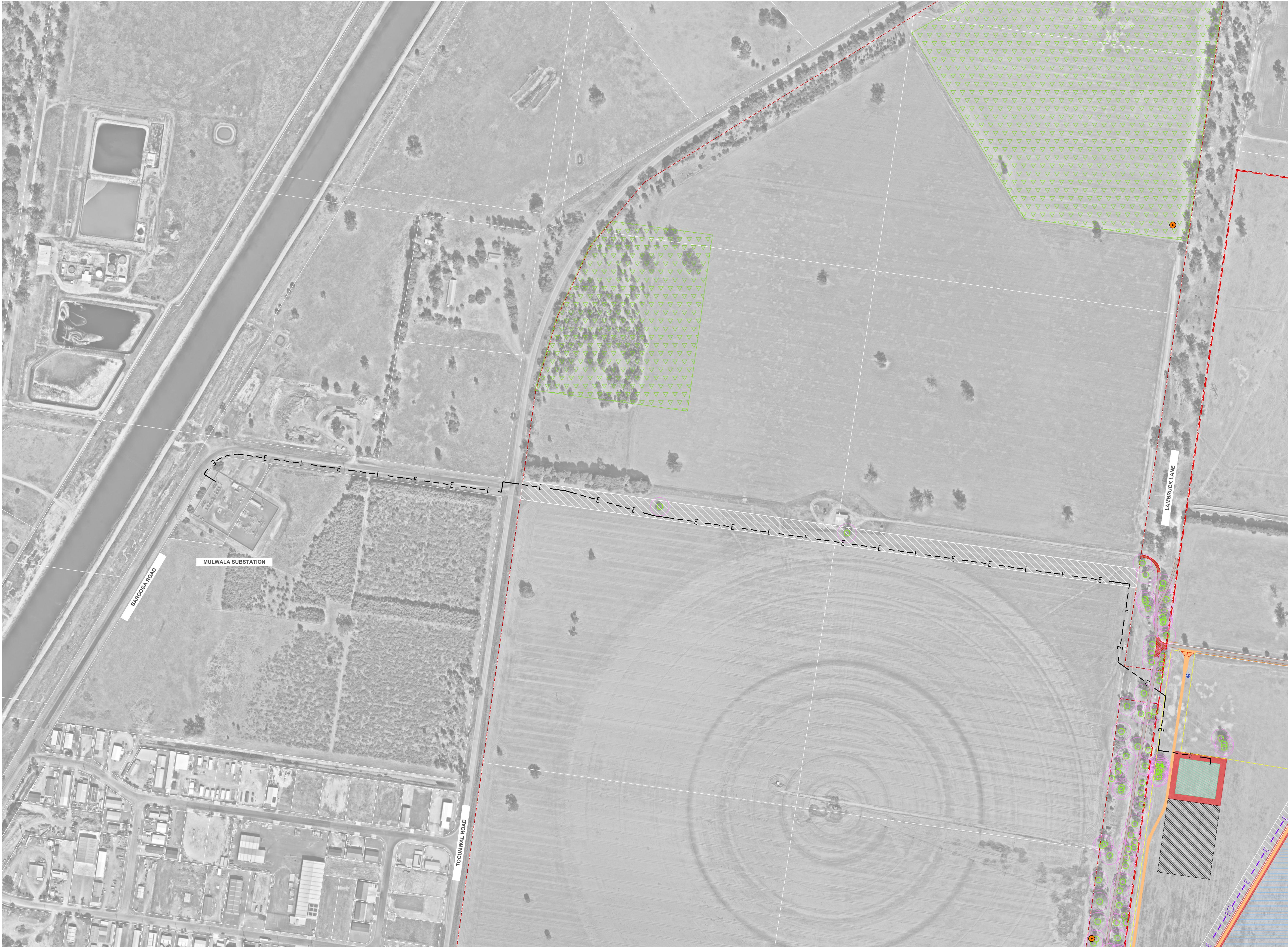
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DRAWING NO.  
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PROJECT NO.  
P0055075  
NORTH

REVISION  
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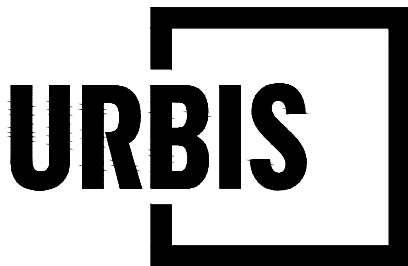


## INDICATIVE PROJECT DETAILS

SECURE FENCED AREA	68.4ha
SECURITY FENCING LENGTH	3.997m
GATES	1
DC CAPACITY	TBC
AC CAPACITY	TBC
2-STRING TRACKER TABLES	22
3-STRING TRACKER TABLES	35
4-STRING TRACKER TABLES	420
PV PANELS	51,212
PITCH	7.7m

## GENERAL LEGEND

	STAGE 1 PROJECT BOUNDARY - 219ha
	DEVELOPMENT FOOTPRINT - COMBINED 420ha
	FENCING - SECURITY
	AREAS SUBJECT TO INUNDATION - TO BE AVOIDED WITH 10M OFFSET
	AREAS OF ECOLOGICAL VALUE - TO BE AVOIDED WITH 10M OFFSET
	NO-GO ZONE - INCLUSIVE OF OFFSET REQUIREMENTS
	10M ASSETT PROTECTION ZONE - TO BE MAINTAINED WITH 10M CLEARING
	4M INTERNAL ACCESS ROADS - REFER TO ENGINEERING DRAWINGS
	EXTERNAL ACCESS UPGRADES - REFER TO ENGINEERING DRAWINGS
	EXTERNAL ACCESS ROADS - TO BE UTILISED
	SUBSTATION & O&M BUILDINGS - REFER TO ENGINEERING DRAWINGS
	TEMPORARY LAYDOWN AREA - DURING CONSTRUCTION ONLY
	INVERTERS - REFER TO ENGINEERING DRAWINGS
	EXISTING TL EASTMENT - TO BE AVOIDED
	EXISTING TRANSMISSION LINE TOWERS - TO BE AVOIDED
	EXISTING TRANSMISSION LINE - TO BE AVOIDED
	INDICATIVE TRANSMISSION LINE ROUTE - SUBJECT TO SEPARATE REF PATHWAY
	5M VEGETATED SCREENING - REFER TO LANDSCAPE STRATEGY
	EXISTING NATIVE TREES (MARKED EXTENTS INCLUDE TP2) - TO BE RETAINED AND PROTECTED
	EXISTING TREES - TO BE REMOVED AT STAGE 1
	GATE
	45,000L WATER TANK & HARDSTAND AREA
	POTENTIAL ABORIGINAL ARTEFACT - TO BE SALVAGED PRIOR TO WORKS
	POTENTIAL ABORIGINAL ARTEFACT - TO BE AVOIDED DURING WORKS
	MET STATION - REFER TO ENGINEERING DRAWINGS

2-STRING TRACKER TABLES (22)  
- 56 PANELS PER TABLE3-STRING TRACKER TABLES (35)  
- 84 PANELS PER TABLE4-STRING TRACKER TABLES (420)  
- 112 PANELS PER TABLE

## PROJECT

## MULWALA SOLAR FARM

## STAGE 1

255 SAVERNAKE ROAD

MULWALA, NEW SOUTH WALES, 2647

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## CLIENT

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## DRAWING TITLE

CONNECTION PLAN - STAGE 1

## ISSUE

FOR REVIEW

SCALE

1:3000 @ A1  
30 60 90 120 150m

## DRAWING NO.

202-F1

## PROJECT NO.

P0055075

NORTH

## REVISION

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REV	DESCRIPTION	DWN	CHK	DATE
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C	FOR REVIEW	AF	PY	27.02.2025
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A	FOR REVIEW	AF	SD	10.02.2025
-	FOR REVIEW	AF	-	04.02.2025

PROJECT DIRECTOR: CLARE BROWN



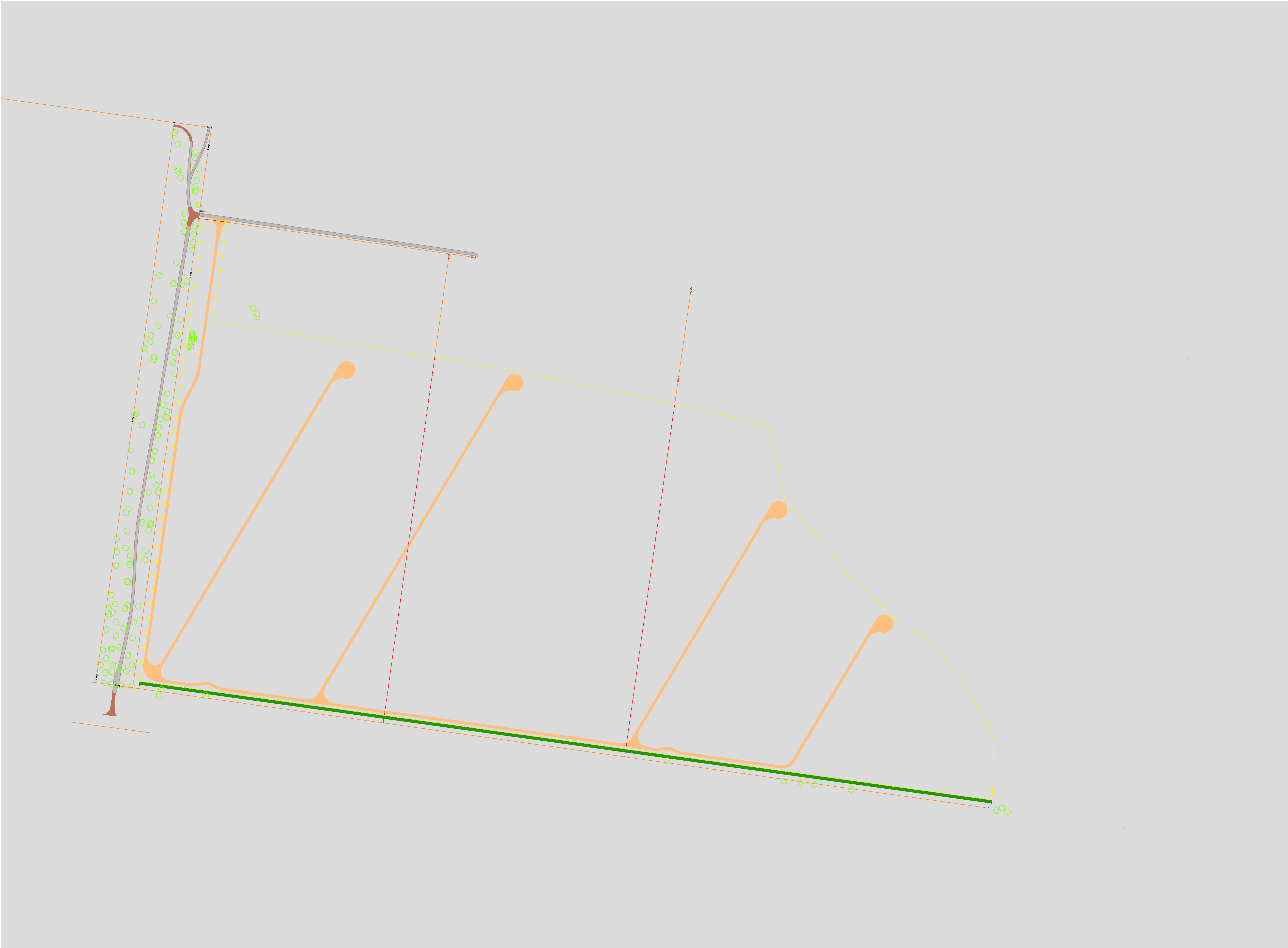
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PLOT DATE: 09.04.2025

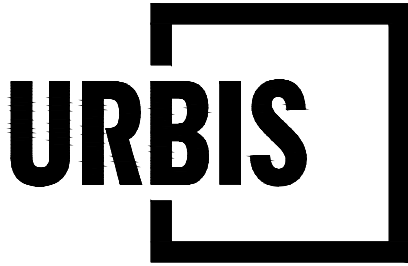
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INDICATIVE PROJECT DETAILS	
SECURE FENCED AREA	68.4ha
SECURITY FENCING LENGTH	3.997m
GATES	1

GENERAL LEGEND

	FENCING - SECURITY
	FENCING - EXISTING STOCK-PROOF - TO BE UTILISED
	FENCING - EXISTING STOCK-PROOF - TO BE REMOVED
	FENCING - NEW STOCK-PROOF - TO ENCLOSE EXISTING SEGMENTS
	4M INTERNAL ACCESS ROADS - REFER TO ENGINEERING DRAWINGS
	EXTERNAL ACCESS UPGRADES - REFER TO ENGINEERING DRAWINGS
	EXTERNAL ACCESS ROADS - TO BE UTILISED
	5M VEGETATED SCREENING - REFER TO LANDSCAPE STRATEGY
	SECURITY GATE
	EXISTING GATE



PROJECT  
**MULWALA SOLAR FARM**  
STAGE 1  
255 SAVERNAKE ROAD  
MULWALA, NEW SOUTH WALES, 2647

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PROJECT DIRECTOR: CLARE BROWN

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DRAWING TITLE  
**FENCING PLAN - STAGE 1**

ISSUE  
FOR REVIEW  
SCALE  
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DRAWING NO.  
**203-F1**  
PROJECT NO.  
**P0055075**  
NORTH  
REVISION  
**E**

## **APPENDIX B**

## **REGISTERED ABORIGINAL PARTY CONSULTATION**



# *Cultural Report: Mulwala Solar Farm*

## *Respecting and Integrating Aboriginal Cultural Heritage*

*For the information of Urbis & Ali Byrne Associate Director*

*Report compiled by Bundyi Culture (RAP) Mark Saddler 24/05/2025*

### *Introduction*

*The Wiradjuri and Bangerang peoples hold a profound connection to the land, one that spans countless generations. Their cultural practices, oral histories, and spiritual traditions are deeply intertwined with the area, forming a rich tapestry of heritage that speaks to their enduring relationship with the environment. Sacred sites, traditional knowledge, and stories passed down through elders reflect their stewardship and reverence for the natural world, as well as their identity and belonging to this region. This special connection to country underscores the significance of recognizing and preserving their cultural heritage in all aspects of development and engagement.*

*The Mulwala Solar Farm project is located within the Corowa Local Government Area (LGA), spanning Lot 1/DP100773; Lots 1-7/DP134511; Lot 103, 114-116, 125, 132/DP752290. This report outlines measures to ensure the integration of cultural heritage considerations, with a particular focus on the Wiradjuri and Bangerang Aboriginal groups, whose ancestral lands encompass the project area.*

### *Engagement with Wiradjuri and Bangerang Aboriginal Groups*

#### *Cultural Immersion Programs*

*All staff, contractors, and proponents involved in the Mulwala Solar Farm project are required to undertake Wiradjuri cultural immersion programs. These programs will be delivered by a local knowledge holder who possesses a TAE Certificate IV in training and assessment. The programs aim to foster deep respect and understanding of Wiradjuri and Bangerang cultural practices and histories.*

#### *Signage and Recognition*

*To respect the cultural significance of the land, signs will be erected at all access points to the project site. These signs will inform visitors and workers that they are entering Wiradjuri/Bangerang Country. Such signage will serve as a daily reminder of the land's importance and promote awareness among all stakeholders.*

### *Environmental Protection*

#### *Preservation of Habitat*

*Crown land access roads within the project area host essential trees, shrubs, and plants that provide habitats for native animals and birds. These ecological elements are to be safeguarded against removal in alignment with environmental conservation practices. Protecting these habitats demonstrates the project's commitment to both biodiversity and the cultural value of the natural environment.*



## *Aboriginal Heritage Management*

### *Repatriation Site for Aboriginal Items*

*A dedicated onsite location will be established for the repatriation of all Aboriginal items that have already been recovered and for those that may still be unearthed during the project. This site will be managed respectfully and will be pivotal in ensuring the preservation of significant cultural artifacts.*

### *Due Diligence and Unexpected Finds Procedures*

*Robust procedures for due diligence and unexpected finds must be integrated into all planning and design phases of the project. These procedures will ensure that any cultural artifacts or heritage elements discovered during the project's execution are handled appropriately, in consultation with Aboriginal representatives. All staff, contractors and land holders must be understanding of these processes and their responsibilities to protect country and culture.*

## *Employment and Training*

### *Prioritising Local Aboriginal Employment*

*The proponents of the Mulwala Solar Farm project are urged to embed contractual agreements that prioritize the employment and training of local Aboriginal people. This initiative will support the economic empowerment of Aboriginal communities and foster their active participation throughout the project's duration. Quality skill sets and training must also be provided.*

### *Cultural Awareness for Local Government*

*The Corowa Local Government Council should also partake in cultural awareness a training as well, so as to deepen their understanding of Wiradjuri and Bangerang heritage. This training will enhance collaboration between the council and Aboriginal groups, ensuring the project's alignment with cultural values.*

## *Conclusion*

*The Mulwala Solar Farm project presents an opportunity to respect and integrate the rich cultural heritage of the Wiradjuri and Bangerang Aboriginal groups. The outlined measures—from cultural immersion programs to habitat preservation, heritage management, and local employment—underscore the project's commitment to respectful and inclusive practices. By engaging with Indigenous communities and protecting the land's ecological and cultural integrity, the project can set a precedent for sustainable and culturally mindful development.*

*Guwayu (Safe Travels)*

*Bundyi Culture (RAP) Mark Saddler*

*E: [marksad@live.com.au](mailto:marksad@live.com.au)*

*P: 0412 693 030*

*Background Artwork: Mark Saddler, Ngumbaay Bula Bila Mayiny (3 River people)*



# APPENDIX C

# HERITAGE NSW COMMENTS

Comments received from Heritage NSW are included below. A brief summary of these comments and the location of relevant amendments in this report is provided in Table 7.

Table 7

Reference	Heritage NSW and DPHI comments	Amendments in report
20 May 2025 Ref: HMS ID 10458 SSD-9039	Update Section 5.1 to clarify that: (a) Registered Aboriginal Parties (RAPs) are to be consulted in the event of unexpected finds, including human remains, being made; (b) Consultation will give the RAPs the opportunity to provide cultural knowledge to inform the assessment of significance for, and provide input into the proposed management of, any unexpected finds.	Section 5.1 (dot point 6)
20 May 2025 Ref: HMS ID 10458 SSD-9039	Update Sections 6.4.1 and 6.4.2 to clearly state at what point in the unexpected finds process consultation with RAPs will be undertaken.	Section 6.4.1 and 6.4.2 updated
20 May 2025 Ref: HMS ID 10458 SSD-9039	Update Section 6.4.2 to provide an outline of the process that would be followed in the event that Aboriginal, historical (non-Aboriginal) or recent human remains are identified.	Section 6.4.2 updated with additional details
20 May 2025 Ref: HMS ID 10458 SSD-9039	Cross references in Section 7.4.1 should be updated as they currently refer to incorrect sections of the document.	Updated
20 May 2025 Ref: HMS ID 10458 SSD-9039	It is also noted that the consultation email provided in Appendix B does not include a closing date for submissions from RAPs regarding the ACHMP. While Heritage NSW does not request any action in this instance, it should be noted for future reference that where feedback is being sought from RAPs, a clear review period should be provided. As a guide, RAPs should be given a minimum of 28 days to review and provide feedback on documents provided for consultation.	Acknowledge. Urbis notes that a minimum of 28 days was allowed for responses and follow up phone calls were made to the three RAPs at the end of this period.
23 June 2025 Ref: SSD-9039-PA-8	'Table 4 – RAP responses to draft ACHMP' (as mentioned in page 4) is missing from the ACHMP. Please update the ACHMP to include this information.	Section 5, Table 4
23 June 2025 Ref: SSD-9039-PA-8	Appendix B – we note evidence of Registered Aboriginal Party (RAP) consultation has been provided. Please include a copy of RAP responses received.	Appendix B.



Reference	Heritage NSW and DPHI comments	Amendments in report
23 June 2025 Ref: SSD-9039-PA-8	Appendix C – we note on 12 June 2025, Heritage NSW provided comments on the ACHMP and requested a revised ACHMP be resubmitted. Following Heritage NSW approval of the revised ACHMP, please submit a final copy to NSW Planning.	Acknowledged.

Our ref: HMS ID 10458

Steffi Fernando  
European Energy  
stfo@europeanenergy.com

Letter uploaded to the Major Projects Planning Portal

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## Aboriginal Cultural Heritage Management Plan – State Significant Development

**Proposal:** Mulwala Solar

**Major Project reference:** SSD-9039

**Received:** 20 May 2025

Dear Ms Fernando,

Thank you for seeking advice from Heritage NSW regarding the Aboriginal Cultural Heritage Management Plan (ACHMP) for above State Significant Development (SSD). It is understood that this referral relates to Condition 20 in Schedule 3 of the SSD approval.

Following review of the ACHMP, Heritage NSW has identified areas where revisions are required to ensure that the plan meets the requirements of the project approval, as outlined below:

1. Update Section 5.1 to clarify that:
  - a. Registered Aboriginal Parties (RAPs) are to be consulted in the event of unexpected finds, including human remains, being made.
  - b. Consultation will give RAPs the opportunity to provide cultural knowledge to inform the assessment of significance for, and provide input into the proposed management of, any unexpected finds.
2. Update sections 6.4.1 and 6.4.2 to clearly state at what point in the unexpected finds process consultation with RAPs will be undertaken.
3. Update Section 6.4.2 to provide an outline of the process that would be followed in the event that Aboriginal, historical (non-Aboriginal), or recent human remains are identified.
4. Cross references in Section 7.4.1 should be updated, as they currently refer to incorrect sections of the document.

Following revision of the ACHMP to address the above comments, please resubmit the plan to Heritage NSW for comment.

It is also noted that the consultation email provided in Appendix B does not include a closing date for submissions from RAPs regarding the ACHMP. While Heritage NSW does not request any action in this instance, it should be noted for future reference that where feedback is being sought from RAPs, a clear review period should be provided. As a guide, RAPs should be given a minimum of 28 days to review and provide feedback on documents provided for consultation.

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. If you have any questions about this correspondence, please contact James Cole, Senior Assessments Officer at Heritage NSW on (02) 9873 8500 or [heritagemailbox@environment.nsw.gov.au](mailto:heritagemailbox@environment.nsw.gov.au)

Yours sincerely,

*Alison Lamond*

Alison Lamond  
Strategic Manager – Major Projects  
Heritage NSW  
Department of Climate Change, Energy, the Environment and Water  
As Delegate under *National Parks and Wildlife Act 1974*  
12 June 2025

Our ref: SSD-9039-PA-8

Steffi Fernando  
Development Manager  
European Energy Australia  
Level 17, 1 Nicholson Street  
East Melbourne, VIC, 3002  
23 June 2025

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Mulwala Solar - Aboriginal Cultural Heritage Management Plan

Dear Ms Fernando

Reference is made to your post approval matter, SSD-9039-PA-8, Aboriginal Cultural Heritage Management Plan (ACHMP), submitted in relation to Schedule 3 Conditions 17-20 of SSD-9039, to the NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 16 June 2025.

NSW Planning has reviewed the ACHMP and considers more information is required to satisfy the conditions of consent. Under the provisions of Schedule 2, Condition 4 of SSD-9039, I, as nominee of the Planning Secretary, request that an amended ACHMP be submitted as a response to this request for information (RFI-86532212) addressing the below points by 21 July 2025 (or as otherwise agreed by the Planning Secretary):

- 'Table 4 – RAP responses to draft ACHMP' (as mentioned in page 4) is missing from the ACHMP. Please update the ACHMP to include this information.
- Appendix B – we note evidence of Registered Aboriginal Party (RAP) consultation has been provided. Please include a copy of all RAP responses received.
- Appendix C – we note on 12 June 2025, Heritage NSW provided comments on the ACHMP and requested a revised ACHMP be resubmitted. Following Heritage NSW approval of the revised ACHMP, please submit a final copy to NSW Planning.

Should you wish to discuss the matter further, please contact Nicholas Kumar on (02) 9995 5804 or email [Nicholas.Kumar@dpie.nsw.gov.au](mailto:Nicholas.Kumar@dpie.nsw.gov.au)

Yours sincerely



Wayne Jones

Team Leader - Post Approval  
Energy Assessments

Wayne Jones  
Team Leader – Post Approvals

As nominee of the Planning Secretary

Our ref: HMS ID 10965

Alexandra Byrne  
Associate Director  
Urbis  
abyrne@urbis.com.au

Letter uploaded to the Major Projects Planning Portal

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## Aboriginal Cultural Heritage Management Plan – State Significant Development

**Proposal:** Mulwala Solar

**Major Project reference:** SSD-9039

**Received:** 30 June 2025

Dear Ms Byrne,

Thank you for seeking advice from Heritage NSW regarding the Aboriginal Cultural Heritage Management Plan (ACHMP) for above State Significant Development (SSD).

The revised ACHMP (dated 27 June 2025) addresses comments provided on the draft document, and the unexpected finds protocol provided in Section 6.4 of the document has been prepared to the satisfaction of Heritage NSW as required by Condition 20 in Schedule 3 of the SSD approval. Heritage NSW has no further comment on the ACHMP at this time.

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. If you have any questions about this correspondence, please contact James Cole, Senior Assessments Officer at Heritage NSW on (02) 9873 8500 or [heritagemailbox@environment.nsw.gov.au](mailto:heritagemailbox@environment.nsw.gov.au)

Yours sincerely,

*Alison Lamond*

Alison Lamond  
Strategic Manager – Major Projects  
Heritage NSW  
Department of Climate Change, Energy, the Environment and Water  
As Delegate under *National Parks and Wildlife Act 1974*  
3 July 2025