



Vimy Resources Limited

Aboriginal Heritage Management Plan

(Management-Based Condition Environmental Management Plan)

Mulga Rock Uranium Project

EHS-EMP-003

Version 1.1

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				Name	Signature
A	28/12/2016	Paula Arthur	Adam Pratt	-	-
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Summary

Title of proposal	Mulga Rock Uranium Project
Proponent name	Vimy Resources Limited
Ministerial Statement Number	1046
Purpose of this EMP	The Aboriginal Heritage Management Plan is submitted to fulfill the requirements of Conditions 7 and 11 of the above Statement.
Key Environmental Factor/s and Objective/s	Aboriginal Heritage To ensure that historical and cultural associations, and natural heritage, are not adversely affected.
Key environmental objectives	Minimise impacts as far as practicable to sites registered with the Department of Planning, Lands and Heritage (DPLH) namely sites DAA1985 and DAA 1986 and any unregistered sites.
Key Provisions:	Management Target 1: No unauthorised disturbance to DAA 1985 and DAA 1986 and unregistered sites

1. Context, scope and rationale

1.1 Proposal

Vimy Resources Limited (Vimy) proposes to develop the Mulga Rock Uranium Project (MRUP or the Project) which lies approximately 240km east-north-east of Kalgoorlie-Boulder in the Shire of Menzies. The area is remote, located on the western flank of the Great Victoria Desert, comprising series of large, generally parallel sand dunes, with inter-dunal swales and broad flat plains.

The MRUP covers approximately 102,000 hectares on granted mining tenure (primarily M39/1104 and M39/1105) within Unallocated Crown Land (UCL). It includes two distinct mining centres, Mulga Rock East (MRE) comprising the Princess and Ambassador resources and Mulga Rock West (MRW) comprising the Emperor and Shogun resources, which are approximately 20km apart. The deposits will be mined using large-scale open pits to produce an annualised peak capacity of 2,180 t/a (4.8 Mlbs) U₃O₈.

The anticipated Life-of-Mine (LOM) is up to 16 years, based on the currently identified resource.

This Condition Environment Management Plan (Condition EMP) has been written in accordance with the *Instructions on how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans* (EPA, 2016).

1.2 Key environmental factors

This management-based CEMP specifically addresses the Aboriginal Heritage environmental factor which is part of the overall Land Theme.

The Development Envelope of the Project, as approved in Ministerial Statement 1046 (MS1046), occurs in an area with no current Native Title Claim. The Wongatha people have previously lodged a Native Title Claim over an area largely to the north of the Project, which includes the proposed extraction borefield, but this claim was rejected by the Federal Court. Since this decision, the Wongatha people have asserted 'Traditional Rights' over this area (described as Wongatha Country).

There are two registered Aboriginal heritage sites within the Development Envelope, DAA 1985 (MINIGWAL 2) and DAA 1986 (MINIGWAL 3). Both are described on the heritage register as artefact / scatter sites and, as such, are archaeological sites (containing physical evidence of past activity). No registered ethnographic sites are located in the area. The EMP addresses these factors to ensure that historical and cultural associations, and natural heritage, are not adversely impacted on by the proposal.

The main risk to Aboriginal heritage from the Project relates to the potential interference or damage to heritage sites in the Disturbance Footprint (i.e. direct disturbance).

1.3 Condition Requirements

Condition	Section in CEMP
11-1 The proponent shall manage the implementation of the Proposal to meet the following environmental objective: 1) Minimise impacts as far as practicable to registered sites DAA 1985 and DAA 1986 and unregistered sites.	Whole document

11-2 The proponent shall consult with the Department of Planning, Lands and Heritage and prepare and Aboriginal Heritage Management Plan required by condition 7-1 that satisfies the requirements of condition 7-2, to meet the objective of condition 11-1 for each stage of the Proposal to be implemented.	Section 4
11-3 The Aboriginal Heritage Management Plan required by condition 7-1 shall include provisions required by 7-2 to manage potential impacts of the proposal on aboriginal heritage including, but not limited to procedures for ground disturbance and environmental induction and training, and may be submitted for each stage of the Proposal prior to ground disturbing activities being undertaken for that stage, to be approved by the CEO.	Section 2
11-4 The proponent shall continue to implement the version of the Aboriginal Heritage Management Plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the Aboriginal Heritage Management Plan required by condition 7-1 satisfies the requirements of condition 7-2 to meet the objective required by condition 11-1	Whole document

1.4 Rationale and approach

1.4.1 Survey and study findings

A total of four surveys have been conducted over the MRUP and these are summarised below:

- McKeich (1982) – carried out an ethnographic survey of the region surrounding the Project involving interviewing twelve Aboriginal elders from Cundeelee, and seven Aboriginal elders from Mt Margaret. The discussions indicated that the area had no present significance and that there were no specific mythological, sacred or camping sites within the Project area they were aware of.
- O'Connor (1984) – carried out an archaeological survey in the region for Aboriginal sites. The survey located six sites containing surface scatters of stone artefacts, however only one site, at a location some distance outside the Development Envelope, was deemed to be archaeologically significant.
- Glendenning (2014) – carried out an archaeological survey in the region for Aboriginal sites. No archaeological sites were identified within the surveyed sites within the Project.
- Mathieu (2015) – carried out two ethnographic surveys of the region surrounding the Project area (one for men and the other for women). The survey interviewed senior Wongatha people who were nominated for participation by the North East Independent Body. The findings were consistent with the 1982 survey with neither survey identifying any ethnographically significant sites.

As provided below, there are two registered Aboriginal heritage sites within the approved Development Envelope, DAA 1985 (MINIGWAL 2) and DAA 1986 (MINIGWAL 3) (Figure 1.1).

Site ID	Access	Restriction	Site Name	Site Type
1985	Open	No	MINIGWAL2	Artefacts / Scatter
1986	Open	No	MINIGWAL3	Artefacts / Scatter

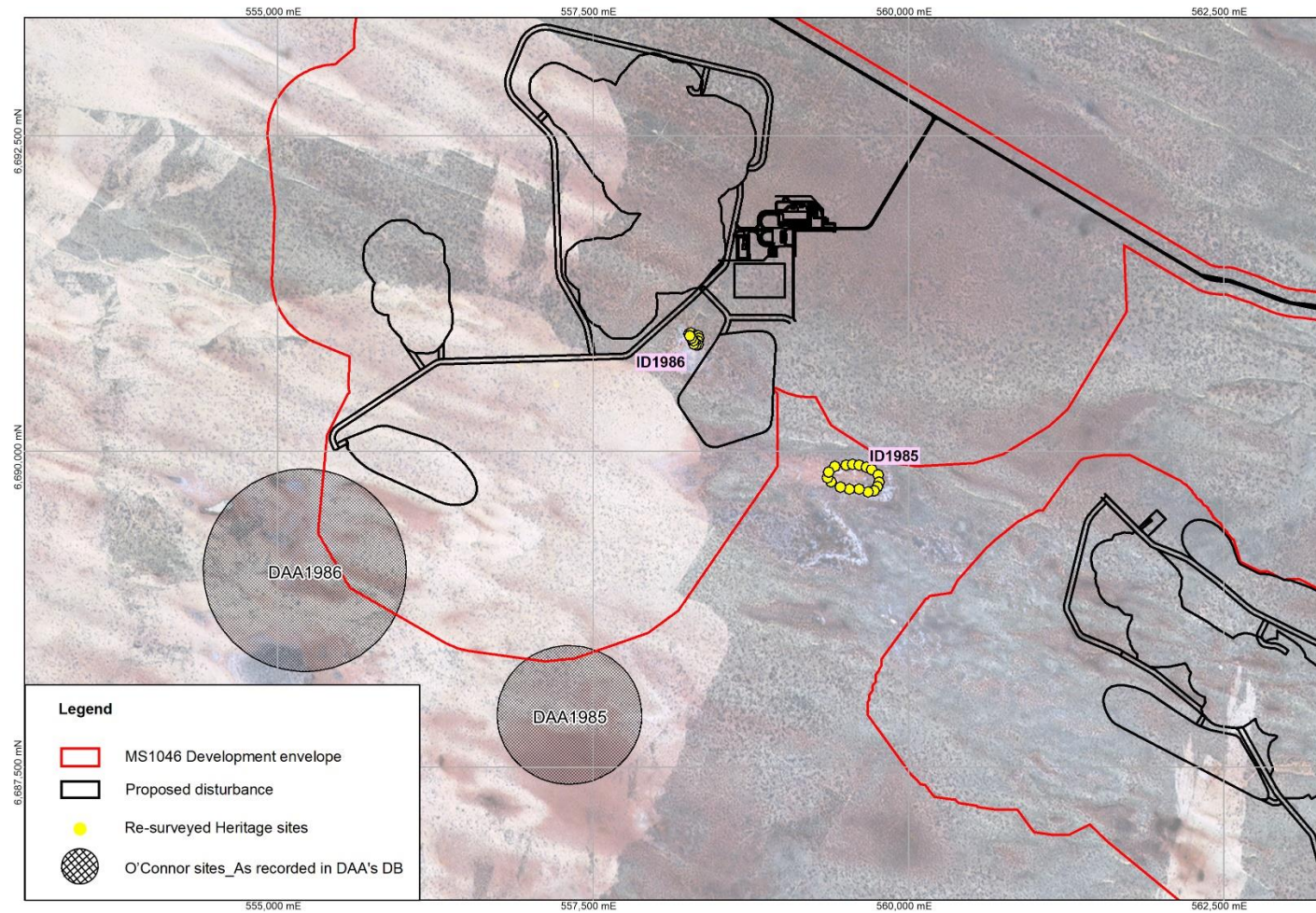


Figure 1.1: Registered Aboriginal Heritage Sites in the approved MRUP Development Envelope

Heritage sites DAA 1985 and DAA 1986 are described on the heritage register as artefact / scatter sites and, as such, are archaeological sites containing physical evidence of past activity. It is important to note that these sites on the DAA Register are incorrectly mapped and do not correspond to the original O'Connor (1984) sites – this error in location is most likely due to an incorrect coordinate system being used. Figure 1.1 shows the original mapped location of ID1985 and ID1986, the location recorded on the DAA Register (DAA1985 and DAA1986) and the recently re-surveyed location (ID1985 and ID1986; Glendenning, 2017). No registered ethnographic sites are located within the MRUP.

1.4.2 Key assumptions and uncertainties

The key assumptions and uncertainties relevant to this CEMP are:

- An additional (currently unknown) group or individual may claim a connection to the land where the MRUP is located.
- When disturbance activities commence, unidentified sites or artefacts may be uncovered.

1.4.3 Management approach

The Aboriginal Heritage Act 1972 provides protection for all Aboriginal sites whether or not they are recorded on the Register of Aboriginal Sites. Under Section 17 of the Act it is an offence to disturb an Aboriginal site, such that any person who:

- excavates, destroys, damages, conceals or in any way alters any Aboriginal site; or
- in any way alters, damages, removes, destroys, conceals or who deals with in a manner not sanctioned by relevant custom, or assume the possession, custody or control, of any object on or under an Aboriginal site,

commits an offence unless they are acting with the authorisation of the Registrar of Aboriginal Sites or the Consent of the Minister for Indigenous Affairs.

Vimy's approach to protecting registered and unregistered heritage sites involves the implementation of a Ground Disturbance Activity Permit (GDAP) system that will prevent any unauthorised ground disturbance from occurring, and will also ensure that adequate controls are in place prior to ground disturbing activities to reduce the risk of impacts to heritage sites. The GIS-based GDAP system includes the location of mapped heritage sites within the MRUP Development Envelope. All proposed clearing and / or disturbance will be assessed for potential impacts to these heritage sites and must be internally authorised before occurring. This process will therefore ensure that direct and indirect impacts on heritages sites are minimised.

In addition to the GDAP system, the management approach will rely on:

- Environmental Inductions – to ensure that all new personnel entering the MRUP are aware of the locations of DAA 1985 and DAA 1986 and their legal obligations under the Aboriginal Heritage Act to protect aboriginal heritage sites and report any new potential sites or items.
- Environmental Training – this will ensure that all personnel undertaking works that may have either a direct or indirect impact on heritage sites DAA 1985 or DAA 1986 are properly trained, are competent to perform the task, and that fit-for-purpose equipment is used to minimise potential impacts.
- Contributing Factors – identification and implementation of management actions to minimise and prevent the contributing factors that may cause either a direct or indirect impact on heritage sites from occurring.

If direct or indirect impacts are reported on DAA 1985 or DAA 1986 then investigations will be undertaken to determine the contributing factors and re-evaluate the appropriateness of existing management actions, establishing new management actions if required, to achieve the management targets and overall environmental objectives.

To assist in the management of Aboriginal heritage sites, Vimy has developed a predictive model that identifies where heritage sites are likely to occur in the Project. This predictive model is based on understanding the geomorphological controls to past utilisation and occupation, and has undergone field validation during recent archaeological surveys to confirm its validity. If however, a previously unidentified Aboriginal site is found (i.e. artefacts are uncovered), the following management actions will occur:

- Land disturbing activities in the immediate vicinity of the proposed site will stop and the site will be barricaded to prevent further disturbance.
- A heritage survey will be conducted by a suitably qualified consultant; relevant Aboriginal people will be consulted where appropriate.
- If the heritage survey determines that the area is not an Aboriginal site, work will recommence.
- If the heritage survey determines that the area is an Aboriginal site, then:
 - a report will be prepared and submitted to the Registrar.
 - it will be listed on the Register of Aboriginal Sites.
 - if land disturbing activities cannot avoid the identified site then a Section 18 application to disturb an Aboriginal site will be lodged with the DPLH.

Aboriginal skeletal / ancestral remains are of great significance to Aboriginal people, who feel strongly about the removal of remains from grave sites. If a burial site or Aboriginal remains are found during land disturbing activities, the following steps will be taken:

- Stop all works in the immediate area and barricade the site to prevent further disturbance.
- Contact the police and DPLH immediately.
- Record the GPS coordinates of the location.
- If the remains are identified as being of Aboriginal origin, the DPLH will seek immediate involvement of the relevant Aboriginal people.
- Vimy will develop, in consultation with the DPLH and relevant Aboriginal people and appropriate action plan for the management of the area.
- DPLH will ensure the site is recorded and placed on the Register of Aboriginal Sites.
- If Vimy wishes to carry on activity in the area, a Section 18 application will be prepared and submitted.

All identified Aboriginal heritage sites will be added to Vimy GIS database so that it is captured in the GDAP process to prevent future disturbance.

1.4.4 Rationale for choice of management target/s

A management target has been established for each contributing factor that may cause an impact to registered sites DAA 1985 and DAA 1986 and unregistered sites. It is expected that by implementing the identified management actions, then the management targets will be achieved which will ensure that the environmental objective is met.

Further protection to DAA 1985 and DAA 1986, and any unregistered sites which occur outside of the approved Disturbance Footprint, is achieved through the *Flora and Vegetation Monitoring and*

Management Plan, which prevents unauthorised ground disturbance, and ensures that any potential indirect impacts that may influence the quality of identified heritage sites, including dust, weeds, saline water and fire, are minimised over the Life of Mine (LoM).

2. EMP provisions

This section of the EMP identifies the legal provisions that Vimy proposes to implement to minimise impacts as far as practicable to registered sites DAA 1985 and DAA 1986 and unregistered sites. It identifies the management actions that Vimy will implement and how they will be monitored and reported, to achieve the management target; thus ensuring that the environmental objective of Condition 11-1 is met. Table 1 provides a detailed list of these provisions.

This section also identifies how Vimy will review and revise management actions if the management targets are exceeded.

2.1 Objective

The environmental objective of Condition 11-1 of Ministerial Statement 1046 is:

- Condition 11-1(1): Minimise impacts as far as practicable to registered sites DAA 1985 and DAA 1986 and unregistered sites.

2.2 Management targets

The following management targets have been identified to ensure that the above environmental objective is met:

- **Management Target 1:** No unauthorised disturbance to DAA 1985 and DAA 1986 and unregistered sites

As mentioned in Section 1.4.4, unauthorised clearing and ground disturbance will be prevented by implementing the Flora and Vegetation Monitoring and Management Plan (Management Target 1). Furthermore, Management Targets 2, 3, 4 and 5 of the *Flora and Vegetation Monitoring and Management Plan* will protect heritage sites against potential indirect impacts from dust, weeds, saline water and fire.

2.3 Management actions

The following specific management actions will be implemented to achieve the above management target. They are prioritised such that the greatest management effort will be placed on the Project activities that have the highest risk of causing environmental impact.

2.3.1 Direct Risks / Impacts

Direct disturbance of heritage sites DAA 1985 and DAA 1986 and unregistered sites

Risk Rating: High

Corresponding Management Target: 1. No unauthorised disturbance to DAA 1985 and DAA 1986 and unregistered sites

Management Actions to be implemented to achieve Management Target 1:

- **Management Action 1** (Ground Disturbance) – Implement GDAP system to prevent unauthorised clearing / disturbance.
- **Management Action 2** (Access) – no unauthorised access to DAA 1985 and DAA 1986 and unregistered sites.
- **Management Action 3** (Reporting) – any unauthorised disturbance of DAA 1985 and DAA 1986 and unregistered sites must be reported immediately as an environmental incident.
- **Management Action 4** (Environmental Induction) – all new site personnel will undertake an environmental induction, emphasising the importance of Aboriginal heritage in the MRUP region and showing locations of known heritage sites to be avoided.
- **Management Action 5** (Environmental Training) – all personnel involved in clearing and ground disturbance activities will undertake training on GDAP process and management actions to take if unauthorised disturbance occurs or when unknown sites are encountered.

2.4 Monitoring

For each management action listed above, a specific monitoring program or task will be undertaken to ensure that the management action is implemented and its requirements met. If monitoring identifies that the requirements of the management action has not been met, then there is a risk that the management target will not be achieved and that the environmental objectives are not attained.

The specific monitoring tasks to be undertaken for each management action is outlined below.

Management Action	Monitoring
<i>Clearing / Disturbance (Management Target 1: No unauthorised clearing or disturbance of flora and vegetation)</i>	
1. Implement GDAP system to prevent unauthorised clearing / disturbance.	Annual audit of authorised vs. actual cleared areas
2. No unauthorised access to DAA 1985 and DAA 1986 and unregistered sites.	Annual audit of Heritage Site Access Register
3. Any unauthorised disturbance of DAA 1985 and DAA 1986 and unregistered sites must be reported immediately as an environmental incident.	Annual audit of Environment Incident Records
4. All new site personnel will undertake an environmental induction, emphasising the importance of Aboriginal heritage in the MRUP region and showing locations of known heritage sites to be avoided.	Annual audit of induction records
5. All personnel involved in clearing and ground disturbance activities will undertake training on GDAP process and management actions to take if unauthorised disturbance occurs or when unknown sites are encountered	Annual audit of training records

As specified in Condition 7-5, if the above monitoring indicates that one or more management actions specified in this CEMP have not been implemented, then:

- (1) A report will be issued to the CEO of the DWER, in writing, within 7 days of identification of the failure to implement the management action/s;
- (2) An investigation will be undertaken to determine the cause of the management action/s not being implemented;
- (3) The potential environmental harm or alteration that may have occurred due to the failure to implement the management action/s will be determined;
- (4) A written report will be issued to the CEO of the DWER within 21 days of the reporting required by Condition 7-5(1), with the report containing:
 - (a) the cause for the failure to implement the management action/s;
 - (b) the findings of the investigation required by Conditions 7-5(2) and 7-5(3);
 - (c) the relevant changes to the implemented to the management actions; and
 - (d) the measures to be undertaken to prevent, control or abate the environmental harm which may have occurred.

As specified in Condition 7-4, if the above monitoring indicates that one or more management targets specified in this CEMP have not been met, then:

- (1) A report will be issued to the CEO of the DWER, in writing, within 21 days of identification of the management target/s not being met;
- (2) An investigation will be undertaken to determine the cause of the management target/s not being met;
- (3) A written report will be issued to the CEO of the DWER within 90 days of the reporting required by Condition 7-4(1), with the report containing:
 - (a) the cause of the management target/s not being met;
 - (b) the findings of the investigation required by Condition 7-4(2);
 - (c) details of the revised and / or additional management actions to be implemented to ensure that the management target/s are met; and
 - (d) relevant changes to the proposal activities.

2.5 Reporting

Reporting of the above monitoring results, and achievement of the management actions and management targets that satisfy the environmental objectives, will occur in the Compliance Assessment Report (CAR) to be submitted annually (in March; starting in 2018) to the CEO of the DWER.

In accordance with Condition 4-6, the CAR shall:

- (1) be endorsed by Vimy's CEO or other person delegated to sign on the CEO's behalf;

- (2) include a statement as to whether Vimy has complied with the conditions;
- (3) identify all potential non-compliances and describe corrective and preventative actions taken;
- (4) be made publicly available in accordance with the approved Compliance Assessment Plan (CAP); and
- (5) indicate any proposed changes to the CAP required by Condition 4-1.

The CAR will also include:

- Monitoring results and trends against management targets;
- Any exceedance of management targets; and
- A review of the management actions and their appropriateness in achieving the management targets and the overall environmental objectives.
- Proposed revision of the management actions, if required, to obtain formal approval from the Department of Water and Environmental Regulation (DWER) to amend the CEMP.

In addition to the CAR, all clearing and disturbance areas, including rehabilitated areas, will be submitted in the annual Mine Rehabilitation Fund (MRF) reporting, and results from specific monitoring programs (e.g. dust monitoring, vegetation monitoring) and details of any environmental discharges (e.g. saline water spills) will be presented in the Annual Environmental Report (AER).

As required under Section 15 of the *Aboriginal Heritage Act 1972*, “Any person who has knowledge of the existence of anything in the nature of Aboriginal burial grounds, symbols or objects of sacred, ritual or ceremonial significance, cave or rock paintings or engravings, stone structures or arranged stones, carved trees, or of any other place or thing to which this Act applies or to which this Act might reasonably be suspected to apply shall report its existence to the Registrar, or to a police officer, unless he has reasonable cause to believe the existence of the thing or place in question to be already known to the Registrar.” Consequently, any aboriginal artefacts or items of significance that are uncovered during clearing or ground disturbance activities must be reported to the DAA; otherwise it is an offence under Section 17 of the Aboriginal Heritage Act.

3. Adaptive Management and Review of the EMP

3.1 Review and revision of management actions

In the event that a management target is not met or is exceeded, Vimy will review and revise the risk assessment, review and revise management actions and identify additional management actions where necessary.

Risks and key impacts with associated management actions and priorities will be reviewed and revised and, if necessary, implement the following adaptive management procedure:

- Investigate the potential cause of failing to meet the management target and identify any impacts to Aboriginal Sites resulting from this failing.
- If the causes of failing to meet the management target or any impacts identified are a result of the MRUP, the risk assessment will be reviewed and revised risk based management actions will be implemented, following formal approval from the DWER, so that the MRUP environmental objective is met.

In accordance with Conditions 7-2(5) and 7-6, the management actions will be reviewed annually (or as directed by the CEO) and revised so that the management targets, and the overall environmental objectives, are met.

Vimy will also implement adaptive management to learn from the implementation of mitigation measures, monitoring and evaluation against management target/s, to more effectively meet the environmental objectives. The following approach will be followed:

- Monitoring data will be systematically evaluated and compared to baseline and reference site data in a process of adaptive management to verify whether responses to the impact are the same or similar to predictions.
- Re-evaluate the risk assessment and revision of risk-based priorities on the basis of monitored information.
- Increased understanding of the local and regional ecological regime.
- Revision when management actions are not as effective as predicted.
- External changes during the life of the proposal (e.g. changes to the sensitivity of the key environmental factor, implementation of other activities in the area, etc.).
- Review of CEMP – changes to CEMP provisions required by a condition, timeframe, etc.

3.1.1 Corrective Actions

If the results of monitoring show that the management targets are not being met then the corrective actions outlined below will be implemented.

Performance Indicator	Action	Responsibility
Disturbance of potential culturally significant artefact without prior approval	<ul style="list-style-type: none"> • Immediately stop clearance activity. • Set up buffer zone to prevent further disturbance until identification /investigation is complete. • Inform DPLH and other relevant stakeholders, raise environmental incident report. • Conduct investigation with appropriate stakeholders to determine if discovery is culturally significant. • Review GDAP process with regards to heritage values and develop additional management measures if required. • Review adequacy of environmental training and induction. 	Environmental Manager

4. Stakeholder consultation

Considerable stakeholder consultation with local indigenous groups, including the Wongatha people, has previously occurred during the preparation and approval of the Public Environmental Review (PER) for the Mulga Rock Project. Consultation regarding Aboriginal Heritage has been with representatives of the Wongatha people who are broadly accepted as the appropriate traditional owner group for the MRUP area.

In addition, the Department of Planning, Lands and Heritage (DPLH; formerly DAA) was consulted during the development of this Condition EMP to ensure that it met the objectives of Condition 11-1 and complied with the Aboriginal Heritage Act 1972.

A summary of the stakeholder consultation that has occurred to date is provided below:

Date	Stakeholder	Topic	Issues Raised	Vimy Response
July 2010	Wongatha People (men)	Ethnographic Survey (6 Wongatha Representatives)	Survey of MRUP	Men's survey of the MRUP
October 2010	Wongatha People (women)	Ethnographic Survey (6 Wongatha Representatives)	Survey of MRUP	Women's survey of the MRUP
July 2010 – June 2015	Archeologist	Archaeological Survey	Survey of MRUP	Archeological survey of MRUP area.
2014	Wongatha People (men))	Confirm prior ethnographic survey in light of project change – same six Representatives	Minor alterations to Project location	Letters confirming prior men's survey remained relevant
2014	Wongatha People (women)	Confirm prior ethnographic survey in light of project change – same six Representatives	Minor alterations to Project location	Letters confirming prior women's survey remained relevant
10/01/2017	DPLH	Met with Cesar Rodriguez and Tanya Butler (Registrar of Aboriginal Sites) to discuss the draft Aboriginal Heritage Condition Environmental Management Plan.	Application of the Aboriginal Heritage Act	Whilst the DPLH would not provide comment on the Management Plan, they simply reiterated that it was required to align with the Aboriginal Heritage Act. No response needed
July 2010 – ongoing (at least once per year but frequently two or three times per year)	Wongatha People through NEIB representatives	Regular meetings (at least annually but frequently more often) to update on project progress and to deal with issues arising.	Progress Support for MRUP	Wongatha people represented by NEIB have consistently and unwaveringly supported the development of MRUP.
November 2018	Wongatha People (NEIB)	Update on project status. Included discussion about Vimy's CEMPs and the proposed s.45C – an insignificant amendment to project layout.	No issues raised and no objection to Vimy's s.45C	S.45C withdrawn despite support of Aboriginal groups

November 2018	Nangaanya-Ku People	Update on project status. Included discussion about Vimy's CEMPs and the proposed s.45C – an insignificant amendment to project layout	No issues raised and no objection to Vimy's s.45C	S.45C withdrawn despite support of Aboriginal groups
November 2018	Nanatadjarra People	Update on project status. Included discussion about Vimy's CEMPs and the proposed s.45C – an insignificant amendment to project layout	No issues raised and no objection to Vimy's s.45C	S.45C withdrawn despite support of Aboriginal groups

On the 18 April 2017 DWER (or the Office of the EPA as it then was) received confirmation from (the then DAA, but now known as) DHLP that “two Aboriginal heritage sites (DAA 1985 and DAA 1986) are present within the project area, and that the plan is adequate to manage these sites” (Appendix A).

Table 1: CEMP Provisions (management-based) table

Purpose of EMP	To meet the legal requirements of Condition 11 of Ministerial Statement 1046			
DWER Factor	Aboriginal Heritage			
DWER Objective	To ensure that historical and cultural associations, and natural heritage, are not adversely affected			
MS 1046 Condition 11-1 Environmental Objective:	(1) minimise impacts as far as practicable to registered sites DAA 1985 and DAA 1986 and unregistered sites.			
Management-based provisions				
Risk / Impact (Risk Ranking)	Management Actions	Management Targets	Monitoring	Reporting
<i>Direct Risks / Impacts</i>				
Disturbance (High)	Ground Disturbance – Implement GDAP system to prevent unauthorised clearing / disturbance	No unauthorised disturbance to DAA 1985 and DAA 1986 and unregistered sites	Annual audit of authorised vs. actual cleared areas	CAR MRF AER
	Access – no unauthorised access to DAA 1985 and DAA 1986 and unregistered sites		Annual audit of Heritage Site Access Register	CAR
	Reporting – any unauthorised disturbance of DAA 1985 and DAA 1986 and unregistered sites must be reported immediately as an environmental incident		Annual audit of the Environmental Incident Register to determine the number and severity of impact to heritage sites	CAR DAA
	Environmental Induction – all new site personnel will undertake an environmental induction, emphasising the importance of Aboriginal heritage in the MRUP region and showing locations of known heritage sites to be avoided		Annual audit of induction records	CAR



Risk / Impact (Risk Ranking)	Management Actions	Management Targets	Monitoring	Reporting
	Environmental Training – all personnel involved in clearing and ground disturbance activities will undertake training on GDAP process and management actions to take if unauthorised disturbance occurs or when unknown sites are encountered		Annual audit of training records	CAR

5. References

EPA (2016). *Instructions on how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans*. Environmental Protection Authority (EPA), Perth, Western Australia.

Glendenning (2014). *A report of an Archaeological Survey of the Proposed Mulga Rock Project Northeast of Kalgoorlie*, unpublished report prepared for Vimy Resources, August 2014.

Glendenning (2017). *A report on the re-survey of the previously recorded archaeological sites ID 1985, ID 1986, ID 1987 and ID 1988 at the Mulga Rock Project Area, northeast of Kalgoorlie*, Unpublished report for Vimy Resources limited.

Mathieu (2015). *Report of an Ethnographic survey: Mulga Rock Uranium Project Area, Great Victoria Desert*, unpublished report prepared for Vimy Resources, May 2015.

McKeich (1982). *A Survey for Aboriginal Sites in the Cundeelee Minigwal Area*, unpublished report prepared for PNC Exploration (Australia) Pty Ltd, August 1982.

O'Connor (1984). *An Archaeological Survey for Aboriginal Sites in the PNC Exploration Lease Area, Officer Basin, Great Victoria Desert*, unpublished report by Centre for Prehistory, UWA for Energy and Minerals Australia Ltd, 1984.



6. Appendices

Appendix A: OEPA letter confirming adequacy of the CEMP



Mr Adam Pratt
Manager, Environment, Health and Safety
Vimy Resources Limited
Ground Floor, 10 Richardson Street
WEST PERTH WA 6005

Our Ref: AC05-2017-0018; 17-058962
Enquiries: Helen Butterworth, 6145 0829
Email: helen.butterworth@epa.wa.gov.au

Dear Mr Pratt

ABORIGINAL HERITAGE MANAGEMENT PLAN – MULGA ROCK URANIUM PROJECT

Thank you for your letter dated 12 June 2017 regarding review of Vimy's Aboriginal Heritage Management Plan by a qualified independent consultant.

The Office of the Environmental Protection Authority (OEPA) requested comment on the Aboriginal Heritage Management Plan from the Department of Aboriginal Affairs (DAA). The OEPA received a response from DAA on 18 April 2017 which confirmed that two aboriginal heritage sites (DAA 1985 and DAA 1986) are present within the project area, and that the plan is adequate to manage these sites.

The DAA noted that consultation include representatives of people with appropriate heritage knowledge to ensure all Aboriginal heritage sites have been identified within the project area. The OEPA considers that the plan needs to be updated to include appropriate evidence of this consultation.

The OEPA notes that there is no requirement to do a peer review under condition 11 of Ministerial Statement 1046.

If you have any further queries please do not hesitate to contact the Assessment Officer above.

Yours sincerely

Anthony Sutton
Director
Assessment and Compliance Division

26 June 2017