

Six Mile Creek Dam Safety Upgrade Project

Cultural Heritage Management Plan

Document No: LMDIP-05829-GNL-CHE-MPL-00001

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Definitions & Abbreviations

Term	Definition
CGER	Coordinator-Generals Evaluation Report on the Impact Assessment Report (May 2019)
CGCR	Coordinator-General's change report – Construction 2025
CHMA	Cultural Heritage Management Agreement
CM	Contractor Construction Manager
CSM	Community & Stakeholder Manager
DETSI	Department of the Environment, Tourism, Science and Innovation
DWATSIPM	Department of Women, Aboriginal and Torres Strait Islander Partnerships and Multiculturalism
ESM	Environment and Sustainability Manager
HSEQ	Health, Safety, Environment and Quality
OCG	Office of the Coordinator-General
PM	Contractor Project Manager

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1. Scope

This Cultural Heritage Management Plan (this management plan) is applicable to all construction phase works associated with the Lake Macdonald Dam Improvement Project (the Project).

This management plan is to be read in conjunction with the:

- Site Environmental Management Plan (SEMP) (LMDIP-05242-GNL-ENV-MPL-00001)
- SMEC Lake Macdonald Water Lowering - Adaptive Management Plan (LMDIP-05327-GNL-ENV-MPL-00002)
- Cultural Heritage Assessment (LMDIP-05327-GNL-CHE-REP-00001)
- SMEC Impact Assessment Report including the Draft Environmental Management Plan (Ref: Appendix B of the SMEC Impact Assessment Report)
- The Aboriginal Heritage Due Diligence Assessment & Historical Heritage Assessment (niche Environment and Heritage) Assessment (Ref: Appendix L of the SMEC Impact Assessment Report)

Seqwater are in the process of finalising a Cultural Heritage Management Agreement (CHMA) for the Lake Macdonald Dam with the Kabi Kabi Peoples Aboriginal Corporation. Management requirements included in this agreement have been incorporated into this Management Plan.

This Management Plan has been prepared to address the relevant imposed conditions outlined in the Coordinator-General's change report 2025 (CGCR) – Construction and recommendations (the addressable items). Project Cultural Heritage impacts were assessed in the SMEC Impact Assessment Report, the Aboriginal Heritage Due Diligence Assessment & Historical Heritage Assessment (niche Environment and Heritage and Cultural Heritage Assessment Report). This management plan addresses the Project Cultural Heritage impacts identified in those impact assessments.

Notably this management plan does not constitute an approved CHMA under part 7 of the *Aboriginal Cultural Heritage Act 2003*.

1.1. Objectives

The objectives of this cultural heritage management plan are to ensure:

- Implementation of the Management requirements included in the CHMA
- Any item or place of heritage significance is recorded and protected
- Appropriate heritage management practices are implemented as required
- Appropriate parties are consulted in the event of an unanticipated heritage discovery

1.2. Stakeholder Consultation

In preparing this management plan the following stakeholders were consulted and feedback considered in the development of management measures:

- The Office of Coordinator General (OCG) through the review of the draft management plans provided in May 2024

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2. Specific Performance Measures

The specific performance measures relevant to the implementation of this management plan have been detailed in Table 1.

Table 1. Performance measures

Specific Performance Measures	Measurable Targets
Avoid or minimise adverse impacts to Aboriginal cultural heritage	<ul style="list-style-type: none"> 100% compliance with the cultural heritage duties of care All known Aboriginal archaeological records are preserved and not impacted by the Project Project activities / disturbance does not occur in the exclusion areas All unexpected cultural heritage finds are recorded, communicated and managed No verified complaints from the community and stakeholders
Avoid or minimise adverse impacts to non-Aboriginal cultural heritage	<ul style="list-style-type: none"> Project activities / disturbance does not occur in the exclusion areas All unexpected cultural heritage finds are recorded, communicated and managed Appropriate stakeholders are engaged to provide advice on unanticipated finds No verified complaints from the community and stakeholders

3. Roles and Responsibilities

Roles and responsibilities applicable to the implementation of this management plan have been detailed in Table 2. These roles and responsibilities are in addition to those described in Table 9 of the SEMP.

Table 2. Roles and responsibilities

Role	Responsibility
Seqwater	<ul style="list-style-type: none"> Manage the construction process as the Project proponent Allocate sufficient resources to prepare, review and update this management plan Ensure that the requirements of any statutory approvals, legislation and this management plan are included in the contract documentation and implemented Undertake audits of the contractor to verify compliance with any legislative requirements and this management plan
Contractor Project Manager (PM)	<ul style="list-style-type: none"> Maintain a master copy of this management plan, a record of the completion of management measures, monitoring records and reports Provide sufficient resources to ensure the effective implementation of this management plan Participate in any audits initiated by Seqwater Coordinate required monitoring Provide relevant and timely information about construction activities that may impact on cultural heritage

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Role	Responsibility
Contractor Construction Manager (CM)	<ul style="list-style-type: none"> Report any incidents, non-compliances and complaints Contractor Project Manager Participate in any investigations of complaints or non-conformances Ensure all staff are trained/inducted to the Project
Contractor Environment and Sustainability Manager (ESM)	<ul style="list-style-type: none"> Primary responsibility for implementation and compliance with this management plan, statutory approvals and legislation Undertake regular inspections of work activities to ensure adherence to this management plan Participate in toolbox talks as required to ensure staff are aware of key concerns associated with cultural heritage Report any incidents, non-compliances and complaints to Seqwater Lead any investigations of complaints or non-conformances and report any findings and corrective actions to Seqwater
Community & Stakeholder Manager (CSM)	<ul style="list-style-type: none"> Ensure community members are appropriately notified of project work requiring cultural heritage Manage the project enquiries and responses Register and report community complaints and ensure adherence to the complaint's procedure
Cultural Heritage Coordinator	<ul style="list-style-type: none"> Point of contact between the Project and the Kabi Kabi Cultural Heritage Coordinator Ensures notifications are provided to the Kabi Kabi Cultural Heritage Coordinator on commencement of Project activities Ensure site specific workplace health and safety and environmental management inductions are provided Ensures that the finds process is managed in accordance with this management plan Liaise with the Kabi Kabi Technical Advisor and Kabi Kabi Cultural Heritage Coordinator as required during the Project Attend site in accordance with the requirements of this management plan and the CHMA
Site Officer	<ul style="list-style-type: none"> Point of contact between the Project and Kabi Kabi Cultural Heritage Coordinator where the Cultural Heritage Coordinator is not available Assist the Cultural Heritage Coordinator as required Notify the Cultural Heritage Coordinator of general complaints, issues and/or disputes received within 48 hours of receipt of the complaint
Kabi Kabi Cultural Heritage Coordinator	<ul style="list-style-type: none"> Undertake cultural heritage inductions for the Project Provide onsite support in accordance with this management plan
Kabi Kabi Technical Advisor	<ul style="list-style-type: none"> Provide support to the Kabi Kabi Cultural Heritage Coordinator to ensure the requirements of the management plan are met
Supervisors	<ul style="list-style-type: none"> Ensure that this management plan requirements are communicated to all personnel and are being fully implemented on site Undertake any rectifications as required by the Contractor Environment and Sustainability Manager
All Project personnel (including Subcontractors)	<ul style="list-style-type: none"> Comply with reasonable directions given by the Principal Contractor regarding environmental matters Comply with the requirements of this management plan as relevant to the subcontracted works Environmental incidents, non-conformances and near misses are to be reported to the Supervisors



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4. Existing Environment

4.1. Non-Indigenous Cultural Heritage

The Project area does not contain any places listed on the national, commonwealth or state heritage registers, however, several features have been identified during the SMEC Impact Assessment Report (refer to Appendix D) as having potential local heritage significance. These features are described in Table 3. An assessment of Project impacts to these features has been described in Section 6.


Table 3. Existing historical features (Non-Aboriginal cultural heritage)

Feature	Significance	Photographs
Noosa Water Treatment Plant		
Lime building	Local	 <p>Facing north east</p>  <p>Facing east</p>

Feature	Significance	Photographs
Clarifier No. 1	Local	
Backwash tank No.1	Local	
Dam wall and spillway	Local	
Camp Cooroora		
Scout activity centre	Local	




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Feature	Significance	Photographs
Bush-style kitchen	Local	
Rotunda	Local	
Open air chapel	Local	


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Feature	Significance	Photographs
Flagpoles	Local	 <p>26.38128°S 152.93626°E ± 5 m WGS84 Flagpole</p>
Entrance gate and wall	Local	
Fireplace	Local	

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Feature	Significance	Photographs
Other		
Lake Macdonald brick structure with dedication plaque near left embankment	Local	

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4.2. Aboriginal Cultural Heritage

A search of the Department of Women, Aboriginal and Torres Strait Islander Partnerships and Multiculturalism (DWATSIPM) Aboriginal Cultural Heritage Database on 14 June 2024 identified two records of Aboriginal cultural heritage sites within the Project area (Refer to Appendix D):

- KC:G17 - Bora ground and is listed with the attributes 'Earthen Arrangement' and 'Cultural Site'. The mapped location falls within the current inundation area of Lake Macdonald.
- KC-0310-1 – Culturally modified tree with the attribute of 'Scarred Tree'. Since registration of this tree, it has been damaged in a storm and stored safely onsite.

The Kabi Kabi People Aboriginal Corporation are the Cultural Heritage Body and the Kabi Kabi First Nation Traditional Owners Native Title Claim Group are the Cultural Heritage Party for the Project.

The Project area has been subject to significant ground and surface disturbance due to previous vegetation clearing and earthworks associated with construction on the original dam wall and later expansion of the water treatment plant.

Landscape features such as remnant vegetation and waterways are commonly identified as places of importance to Aboriginal people. Remnant vegetation is located along Six Mile Creek adjacent to the Project, north of Collwood Road and south of the left embankment. The proximity to remnant vegetation indicates a high potential for Aboriginal cultural heritage. Six Mile Creek may have intangible cultural heritage value to Aboriginal people.

The cleared area at Camp Cooroora is proposed to be used as a 'borrow pit'. The area has been previously subject to ground disturbance due to tree clearing. The location of Camp Cooroora in an elevated position in close proximity to a possible ceremonial ground located along the former major creek line (Six Mile Creek) suggests potential for Aboriginal cultural heritage.

5. Legislation and Other Compliance Requirements

5.1. CGCR Addressable Items

Details of the applicable CGCR addressable items and how these have been addressed in the management plan have been detailed Table 4

Table 4. CGCR addressable items relevant to this management plan

CGCR Reference	Type	Addressable Items	How addressed in this management plan
<i>Coordinator-General (CG) Conditions</i>			
Appendix A. Imposed Conditions, Schedule 1, Condition 1 (c) Site Environmental Management Plan (SEMP)	Imposed Condition	<p>The SEMP must include the following construction EMPs:</p> <p>(J) cultural heritage management plan</p>	<p>This Management Plan has been developed to comply with this condition and includes performance criteria, mitigation measures, monitoring reporting, responsibility and corrective action.</p> <p>Performance criteria are described in Section 2 and Table 1</p> <p>Mitigation measures are provided in Section 7, Table 7, MM1-MM24</p>

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CGCR Reference	Type	Addressable Items	How addressed in this management plan
			<p>Monitoring is described in Section 9 and Table 9</p> <p>Reporting is described in Section 11 and Table 11</p> <p>Roles and responsibilities are described in Section 3 and Table 2</p> <p>Corrective actions are described in Section 10 and Table 10</p>

5.2. Legislation

Details of relevant legislation applicable to this management plan are provided in Table 5. It is noted that *Environment Protection and Biodiversity Conservation Act 1999* and *Queensland Heritage Act 1992* do not apply to the Project as it does not impact on places included in the World Heritage List, National Heritage List, Commonwealth Heritage List or the State Heritage register.

Table 5. Other legislation applicable to this management plan

Legislation	How it Applies to this management plan
<i>Aboriginal Cultural Heritage Act 2003</i> (ACH Act)	<p>In accordance with the ACH Act, the proponent has a 'duty of care' to take all reasonable and practicable measures to ensure the Project does not harm Aboriginal or Torres Strait Islander cultural heritage.</p> <p>The Project contains two cultural heritage sites entered into the Aboriginal Cultural Heritage Database, being the Bora ground and scarred tree. Activities that will excavate, relocate, remove or harm these sites should not proceed without the agreement of the Kabi Kabi People Aboriginal Corporation or a Cultural Heritage Management Plan.</p> <p>Demolition and reinstallation of the existing spillway and embankment and establishment of temporary works, e.g. coffer dam, laydown areas and access roads will cause ground disturbance and have the potential to impact Aboriginal cultural heritage.</p> <p>Consistent with the 'duty of care', the proponent is required to report unexpected finds to the Kabi Kabi People Aboriginal Corporation.</p>
Noosa Plan 2020	<p>The strategic outcomes of the Noosa Plan 2020 aim to recognise and retain, through identification and protection of Queensland heritage places and local heritage sites and character areas. Several places of potential local heritage significance were identified in the SMEC Impact Assessment Report and the CGER.</p>

6. Potential Impacts

The construction activities, aspects and potential impacts relevant to this management plan have been detailed in Table 6.

Table 6. Potential impacts – cultural heritage

Construction Activity	Potential Impact Number	Potential Impact – Cultural Heritage
Demolition and reinstallation of the existing dam wall, spillway and embankment and establishment of temporary works, e.g. coffer dam, laydown areas and access roads	PI1	Demolition and removal of the existing dam wall and spillway and the Lake Macdonald brick structure with dedication plaque
	PI2	Indirect impacts to structures with local heritage significance due to proximity to site works
	PI3	Demolition, construction and establishment of temporary works impacts non-Aboriginal cultural heritage
	PI4	Construction of permanent works for the spillway and embankment upgrades (including demolition) and establishment of temporary works will cause ground disturbance, resulting in destruction of Aboriginal cultural heritage values
	PI5	Impacts to landscape features including remnant vegetation and waterways (Six Mile Creek) that may have intangible cultural heritage values to Aboriginal people

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7. Management Measures

The management measures that will be implemented to minimise the potential for impacts to cultural heritage have been detailed in Table 7.

Table 7. Management measures

No.	Hold Point	Actions	Related Potential Impact	Staff Responsible	When
MM1		All site operations to be carried out in accordance with the CHMA between Seqwater and the Kabi Kabi People Aboriginal Corporation (once executed).	PI4 & PI5	ESM/ Seqwater	Workplace Planning / Project Delivery
MM2	Y	Obtain photographic record of structures with potential local heritage significance described in Section 4, in accordance with the Department of the Environment, Tourism, Science and Innovation (DETSI) Guideline for Archival Recording of Heritage Places, including: Dam wall and spillway Lake Macdonald brick structure with dedication plaque (south of left embankment) The dedication plaque will be salvaged and returned to Noosa Shire Council as requested by Council February 2024.	PI1	ESM/ Seqwater	Workplace Planning
MM3	Y	The Contractor must provide a Scope of Works and a Work Schedule to both the Seqwater and Kabi Kabi Cultural Heritage Coordinator within twenty (20) Business Days of the Commencement Date of relevant clearing works unless otherwise agreed.	P15	ESM/ Seqwater	Workplace Planning
MM4		Ensure construction avoids (as far as practicable) the areas of remnant vegetation north of Collwood Road, south of the left embankment, and along Six Mile Creek (north of the spillway).	PI4 & PI5	ESM	Workplace Planning
MM5		Ensure construction avoids (as far as practicable) any direct or indirect impacts on Aboriginal and non-Aboriginal heritage items or structures.	PI2, PI3, PI4 & PI5	ESM	Workplace Planning
MM6	Y	Establish temporary exclusion flagging or fencing around historic structures within Camp Cooroora to reduce potential for accidental damage, prior to construction and / or preconstruction minor works.	PI2	ESM	Project Delivery
MM7		Up to two Cultural Heritage Officers (inclusive of one Senior Cultural Heritage Officer if appropriate) will monitor each machine or equipment undertaking tree clearing, including where remnant vegetation is likely to be trimmed, lopped or removed, and will inspect the root balls of mature felled trees for Aboriginal Cultural Heritage in situ so that the provenance of any cultural material is preserved.	P15	ESM	Project Delivery
MM8		If human remains are discovered on site, all work surrounding the area must cease and the area must be secured. The Discovery of	PI3 & PI4	ESM	Project Delivery

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No.	Hold Point	Actions	Related Potential Impact	Staff Responsible	When
		Human Remains Work Instruction (Appendix A) must be followed, and Police are to be notified as soon as possible. Work must not recommence in the area until this is authorised by the Police. Where human remains are determined to be historical, report remains to: <ul style="list-style-type: none"> • DETSI; or • If the human remains are determined to be Aboriginal heritage, the Cultural Heritage Unit of DWATSIPM Where human remains, work must not recommence until authorised by the relevant administering authority (DETSI or DWATSIPM).			
MM9	Y	The Kabi Kabi Cultural Heritage Coordinator will be notified of any vegetation clearing, disturbance or excavation works at least 48 hours prior to commencement of works.	PI4 & PI5	Seqwater Superintendent / Cultural Heritage Coordinator	Workplace Planning
MM10	Y	Removal of any vegetation from the Project area will be confined to the Stockpile Area and Native Vegetation area shown in Appendix E. Cultural Heritage Officers must attend the site to inspect the root balls of mature felled trees in situ. Mature felled trees will not be removed from the point of origin prior to the inspection. The Cultural Heritage Coordinator will liaise with the Kabi Kabi Cultural Heritage Coordinator to determine the appropriate disposal of the felled trees.	PI4 & PI5	PM / Cultural Heritage Coordinator	Project Delivery
MM11	Y	Review the Borrow Area clearing footprint (Error! Reference source not found. E) and develop and implement tree protection zones in conjunction with the Kabi Kabi Cultural Heritage Coordinator, to minimise impacts to vegetation outside of the clearance area.	PI4 & PI5	PM / Cultural Heritage Coordinator	Workplace Planning
Unexpected Finds – Aboriginal Cultural Heritage					
MM12		Where any additional, unrecorded Aboriginal cultural heritage artefacts are encountered during construction, the Cultural Heritage Finds procedure (Appendix B) must be followed. Further details related to Unexpected Finds – Aboriginal Cultural Heritage can be found in Clause 18 of the CHMA.	PI4	All Personnel	Project Delivery
MM13		All work within at least 20 m radius of the find must cease and the area must be secured. Items found must be left in situ – do not remove, disturb, or damage the find. Erect temporary barriers, flags, or signage to secure the area and prevent access. Notify the Site Officer immediately upon discovery.	PI4	All Personnel	Project Delivery
MM14		Where no representatives of the Aboriginal Party are present at the time of discovery, contact the Kabi Kabi Cultural Heritage Coordinator by telephone and email as soon as practicable. If the Cultural Heritage Coordinator is unreachable, notify the Service Provider.	PI4	Site Officer	Project Delivery
MM15		Where a Kabi Kabi Cultural Heritage Officer is present on-site, they will: <ul style="list-style-type: none"> • Inspect and document the find in situ 	PI4	Kabi Kabi Cultural	Project Delivery

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No.	Hold Point	Actions	Related Potential Impact	Staff Responsible	When
		<ul style="list-style-type: none"> Determine if the find requires immediate removal or further protective measures 		Heritage Coordinator	
MM16		Where a Kabi Kabi Cultural Heritage Officer is not present onsite, the Cultural Heritage Coordinator will organise attendance within 48 hours to assess the find."	PI4	Cultural Heritage Coordinator	Project Delivery
MM17		<p>The Cultural Heritage Officer or Kabi Kabi Cultural Heritage Coordinator will recommend specific management actions, including:</p> <ul style="list-style-type: none"> Safe collection, documentation, and relocation if necessary Establishment of exclusion zones to protect the find Amendments to the construction work schedule to avoid further impacts <p>Where a find is not considered to be of particular significance as defined in the ACH Act, it will be removed from the Project area by the Cultural Heritage Coordinator following standard archaeological procedure or a process which is culturally appropriate to the Kabi Kabi People.</p>	PI4	ESM	Project Delivery
MM18		Document find using the Find Recording Form (Appendix C: Find Recording Form) and report all finds to DWATSIPM. Documentation must include location and description of the find, photographic evidence and proposed management actions. All documentation must be securely stored and shared with relevant stakeholders as required.	PI4	Cultural Heritage Coordinator	Project Delivery
MM19		Where temporary storage onsite storage of the find is required, a secure location will be designated to protect it until further actions are determined.	PI4	Cultural Heritage Coordinator	Project Delivery
MM20		Once management actions have been finalised and implemented, and authorisation from DWATSIPM has been granted, work can recommence. Communicate necessary information to Project personnel as appropriate, ensure sensitive information is only disseminated as necessary.	PI4	ESM	Project Delivery
Unexpected Finds – Non-Aboriginal Cultural Heritage					
MM21		Where any additional, unrecorded non-Aboriginal cultural heritage artefacts are encountered during construction, the Cultural Heritage Finds procedure (Appendix B) must be followed.	PI3	ESM	Project Delivery
MM22		In the event of an unanticipated discovery, works must cease in the area, all plant and equipment removed to a suitable distance, the area cordoned off to prevent entry. The discovery must be documented with photographic evidence of the scene and location. The Seqwater Cultural Heritage Officer must be immediately notified.	PI3	All Personnel	Project Delivery
MM23		All finds must be reported to the DETSI. Protection and management measures are agreed upon with DETSI and communicated to all personnel.	PI3	ESM	Project Delivery
MM24		Works potentially affecting the previously unidentified objects must not recommence until authorised by DETSI.	PI3	ESM	Project Delivery

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8. Hold Points

The key hold point that will be adopted for the cultural heritage management has been detailed in Table 8.8. A hold point is a point beyond which a work process must not proceed without express authorisation from Seqwater.

Table 8. Project hold points

Hold Point Number	Related Management Measure	What	When does it occur	Staff responsible	Construction activities restricted until Hold Point completed
1	MM2	Photographic record of structures with potential local heritage significance described in Section 4, in accordance with the <i>DETSI Guideline for Archival Recording of Heritage Places</i> .	During Workplace Planning	ESM/ Seqwater	Demotion of the dam wall and spillway and Lake Macdonald brick structure with dedication plaque
2	MM3	Notify Kabi Kabi Cultural Heritage Coordinator within twenty (20) Business Days of the Commencement Date of relevant clearing works.	During Workplace Planning	ESM/ Seqwater	Clearing of remnant vegetation / Cat 5 Duty of Care zones
3	MM6 MM7	Establish temporary exclusion flagging or fencing around historic structures including Camp Cooroora and the culturally modified tree which was listed on the Aboriginal Cultural Heritage Database (KC-0310-1)	During Delivery	ESM	Prior to any clearing within 50 m of the Camp Cooroora or KC-0310-1
4	MM10	Kabi Kabi Cultural Heritage Officers must inspect the root balls of mature felled trees in situ and determine the appropriate disposal method	During Delivery	PM / Cultural Heritage Coordinator	Prior to removal of felled trees
5	MM11	Review vegetation clearing footprint in the Borrow Area and develop tree protection zones to avoid impacts to the root system of retained trees.	During Workplace Planning	PM / Cultural Heritage Coordinator	Prior to vegetation clearing

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9. Monitoring

To verify this management plan is achieving its performance measures the monitoring program as described in Table 9 will be implemented.

Table 9. Monitoring program

No.	What	Who	When / Frequency
1	Daily observation of heritage protection measures will be made and documented in site diaries (where applicable).	Sup	Daily
2	Heritage management will be inspected as part of a weekly site inspection. Results of the weekly inspection will be recorded.	ESM	Weekly
3	Quarterly (internal) and annual (external) audits of this management plan.	ESM	Quarterly/Annual
4	Effectiveness of cultural heritage controls shall be regularly reviewed for adequacy having regard for changing circumstances.	ESM	Regularly during Project Delivery
5	Appropriate monitoring and surveillance will be undertaken upon receipt of any complaint or community concern about cultural heritage management	ESM	On receipt of complaint or community concern

10. Corrective Actions

Corrective actions that will be implemented in the event that a performance measure has not been achieved, have been detailed in Table 10 10.

Table 10. Corrective action plan

Issue / Event	Event Response
Non-conformance with this Management Plan	<ul style="list-style-type: none"> Notify the supervisor responsible for the area of non-conformance ESM will provide the supervisor instructions to resolve the non-conformance ESM will check the non-conformance is rectified 24 hours after the instruction was given
Observable impact on Aboriginal or non-Aboriginal cultural heritage	<ul style="list-style-type: none"> Works within 20 m of the area of impact to immediately cease ESM to undertake an incident investigation to determine the potential cause of the impact on cultural heritage Records of the incident investigation must be recorded on the Seqwater incident management system If the cause of the impact is from construction activities, the ESM will provide appropriate corrective actions to rectify the impacts such as establishing exclusion areas Document corrective actions in an update of this management plan
Community concern or complaint relating to cultural heritage	<ul style="list-style-type: none"> All details and any subsequent correspondence with the relevant community member will be logged by the CSM The CSM must reach out to the community member and determine the specifics of the complaint Review the site and/or consult with the Kabi Kabi People Aboriginal Corporation to verify concern / complaint Determine whether any corrective actions (e.g. exclusion zones) can be adopted to mitigate impacts

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Issue / Event	Event Response
	<ul style="list-style-type: none"> Implement corrective actions The CSM will notify the community member and advise of the corrective actions taken within 24 hours of the initial notification of the concern or complaint The CSM will follow-up with the community member 48 hours after the initial notification to seek feedback on the suitability of the corrective actions, where appropriate If corrective actions have not rectified the issue for the community member, determine whether further actions can be adopted and continue to liaise with the community member until the issue has been resolved If corrective actions are suitable document the actions in an update of this management plan

11. Reporting

Reporting that will be undertaken in accordance with this management plan has been detailed in Table 11.

Table 11. Reporting plan

No.	Reporting Required	By Whom	By When	To Whom
1	Notification of unexpected Aboriginal and non-Aboriginal cultural heritage archaeological finds.	All personnel	Immediately	Supervisor / ESM / Seqwater
2	Notification of unexpected Aboriginal and non-Aboriginal cultural heritage archaeological finds.	Seqwater	Immediately	DETSI / DWATSIPM / Kabi Kabi People Aboriginal Corporation
3	Reporting of identification of human remains.	All personnel	Immediately	Supervisor / ESM
4	Reporting of identification of human remains.	Supervisor ESM	Immediately	Police / Seqwater
5	Reporting of identification of historical human remains.	Seqwater	Immediately following historical determination	DETSI / DWATSIPM / Kabi Kabi People Aboriginal Corporation
6	Details of field observations will be reported via the Weekly Environmental Inspection Checklist, and communicated during pre-starts, toolbox and team meetings as appropriate.	ESM / Sup	Project Delivery	All personnel
7	All complaints / incidents regarding cultural heritage management will be reported immediately.	All personnel / CSM	Within 1 hour of an incident / complaint	ESM / PM / Seqwater
8	Results of complaint investigations and corrective actions.	CSM / ESM	Within 24 hours of the complaint	Complainant / PM
9	Results of cultural heritage monitoring undertaken in conjunction with the Kabi Kabi People Aboriginal Corporation.	ESM	Weekly during monitoring events	Seqwater
10	Monthly report to Seqwater that includes details of cultural heritage monitoring	ESM	Monthly	Seqwater

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No.	Reporting Required	By Whom	By When	To Whom
	results, audits, non-conformance, training and incidents.			
11	<p>Quarterly report to the CG as per the requirements of schedule 2, condition 2. Report will include:</p> <ul style="list-style-type: none"> • An evaluation of compliance with the SEMP • Monitoring data required by the Imposed Conditions included in Schedule 2 of the CGCR (2025) for the period and an interpretation of the results • Details of any environmental incident during the reporting period, including a description of the incident, resulting effects, corrective actions (including site remediation activities), revised activity practices to prevent a recurrence, responsibility and timing <p>The reports must be provided to the Coordinator-General and also be made available on the Project website within 20 business days of the end of the three-month period to which the report relates and continue to be available on the project website for the duration of the Project.</p>	Seqwater	Quarterly	Coordinator-General

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12. Training and Awareness

Site inductions will include the following specific components for cultural heritage:

- Cultural heritage values in the Project area (both within the lake area and in the terrestrial surrounds), and the importance of protecting and preserving these values
- Relevant legislation
- Information on mitigation and control measures
- The requirements of this plan, as well as contractual obligations
- Incident response, management and reporting, including the procedure in the event of an unanticipated discovery or accidental damage of a heritage item or place
- The requirements of the CHMA
- Locations on a site plan of any known areas/items of cultural heritage significance and exclusion zones

All personnel will undertake a site specific cultural heritage induction about Kabi Kabi traditional law, custom and identification, protection and management of Aboriginal Cultural Heritage, delivered by representatives of the Kabi Kabi People Aboriginal Corporation. Further details on Cultural Heritage Induction requirements can be found in Clause 13 of the CHMA.

13. Review and Continual Improvement

This management plan shall be reviewed within the first 3 months of site mobilisation to ensure the plan is fit for purpose and any identified incidents, issues or hazards are addressed in the Management Plan accordingly. Follow up reviews are to be undertaken annually during construction. This management plan may be reviewed, out of the normal cycle, in the event of a legislative breach, incident, community complaint or when a new impact is discovered.

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14. Appendix A: Discovery of Human Remains Work Instruction

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15. Appendix B: Cultural Heritage Finds Procedure

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16. Appendix C: Find Recording Form

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17. Appendix D: Existing non-Indigenous cultural heritage sites

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18. Appendix E: Cultural heritage project boundaries and disturbance areas

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