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Site Avoidance Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for Miscellaneous Licence L08/325 at the Mardie Salt & Potash Project, south of Cape Preston, May 2024

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**BCI Ref: AN202301YM**

Report Prepared for



*Horizon Heritage Management acknowledges and pays respect to the Yaburara & Mardudhunera People native title holders and community.*

### **DISCLAIMER**

The following information is being supplied to BCI Minerals Limited (BCIM) so it can manage its requirements and responsibilities under the *WA Aboriginal Heritage Act (1972) (AHA)*. Aboriginal sites, places and objects are afforded protection under the AHA. Any heritage impacts without consultation with the Yaburara & Mardudhunera People and if required Section 18 consent from the Minister for Aboriginal Affairs could be an offence under Section 17 of the AHA. This heritage reporting and information is being supplied to BCIM so it can manage its proposed Mardie Salt & Potash Project to minimise risks to Aboriginal heritage and culture.

## **EXECUTIVE SUMMARY**

### **Brief**

Horizon Heritage Management was engaged by the Wirrawandi Aboriginal Corporation (WAC) on behalf of the Yaburara and Mardudhunera People to undertake a Site Avoidance Aboriginal heritage survey at Miscellaneous Licence L08/325 for a proposed new airstrip with representatives of the Yaburara & Mardudhunera native title holders for the BCI Minerals Limited (BCIM) proposed Mardie Salt & Potash Project near Cape Preston, south of Karratha, Western Australia. The scope of the works is to include archival research, a field investigation and reporting.

### **Mardie Salt Project**

BCI Minerals Ltd is rapidly advancing its 100% owned Mardie Salt & Potash Project, a potential Tier 1 project located on the West Pilbara coast in the centre of Australia's key salt production region.

Mardie will produce 4.4Mtpa of high-purity salt (>99.5% NaCl) and 120ktpa of sulphate of potash (SOP) (>52% K<sub>2</sub>O) via solar evaporation of seawater. Using an inexhaustible seawater resource and a production process driven mainly by natural solar and wind energy, Mardie is a sustainable opportunity to supply the salt and potash growth markets in Asia over many decades.

### **Proposed BCIM Work Program**

Further to the heritage surveys conducted between 2017 and 2022 BCIM would like to conduct a heritage survey with Yaburara & Mardudhunera Traditional Owners for Miscellaneous Licence L08/325. These works are within the determined Yaburara & Mardudhunera People Native Title area.

### **Aboriginal Heritage Survey**

The heritage survey of Miscellaneous Licence L08/325 at the BCIM Mardie Salt & Potash Project was conducted on the 7<sup>th</sup> of May 2024 with Yaburara & Mardudhunera Traditional Owners; Ian Wally, Terrance Boona and Audrey Cosmos with Horizon Heritage Management Consultants Damien Lafrentz and Rhys Lucey.

Horizon Heritage Management and the Yaburara & Mardudhunera Traditional Owners conducted a Site Avoidance Aboriginal heritage survey under the *Aboriginal Heritage Act* (1972) of Miscellaneous Licence L08/325. This survey type was chosen to determine whether the proposed development will impact upon Aboriginal sites or heritage values.

### **Heritage Survey Results**

Horizon Heritage and the Yaburara & Mardudhunera Traditional Owners identified no new Aboriginal sites or places during the heritage survey of Miscellaneous Licence L08/325.

## Conclusions

Horizon Heritage Management and the Yaburara & Mardudhunera People make the following conclusions:

1. Aboriginal heritage site and places represent Australian history and it is important for current and future generations that they are conserved and protected.
2. BCIM are fulfilling their obligations under the land access agreement with the Yaburara & Mardudhunera People and the *WA Aboriginal Heritage Act (1972)* to assess the land for Aboriginal cultural heritage values.
3. The Yaburara & Mardudhunera Traditional Owners have no heritage concerns with Miscellaneous Licence L08/325 and a proposed new airstrip.
4. One registered site DPLH 10351 Wiruwandi Plain is immediately adjacent to the Miscellaneous Licence L08/325 survey area. This site is protected under the AHA and any disturbance will require Section 18 consent under the AHA. BCIM must avoid the registered site DPLH 10351 Wiruwandi Plain to prevent any breaches of Section 17 of the AHA.

## Recommendations

Horizon Heritage Management and the Yaburara & Mardudhunera People make the following recommendations:

1. BCI Minerals Limited can proceed with development activities (proposed new airstrip) within Miscellaneous Licence L08/325 the Yaburara & Mardudhunera Traditional Owners have given heritage consent for this activity to be undertaken.
2. In the instance of any previously unrecorded heritage places being identified during the course of infrastructure development activities, BCI Minerals Limited should avoid the area and must contact the Yaburara & Mardudhunera People through their RNTBC the Wirrawandi Aboriginal Corporation and/or Horizon Heritage Management.
3. If human remains, skeletal materials that may be human or materials that may be a human grave, are uncovered within the cleared work program areas BCI Minerals Limited and its contractors must stop work immediately and the materials and the area must be left undisturbed. The Yaburara & Mardudhunera People through their PBC the Wirrawandi Aboriginal Corporation and/or Horizon Heritage Management must be informed immediately.
4. BCI Minerals Limited keeps the Yaburara & Mardudhunera People through their RNTBC the Wirrawandi Aboriginal Corporation informed of any further developments on their native title determined traditional country.
5. All BCI Minerals Limited staff and contracting personnel are made fully aware of their obligations under the *Aboriginal Heritage Act (1972)*.

## **Recognition of People & Country**

Horizon Heritage Management acknowledges the Traditional Owners of the land and sea of this area, the Yaburara & Mardudhunera People. We pay respect to the Elders past, present and emerging who hold the memories, traditions, culture and hopes for the future.

## **Confidentiality**

This is an open report and no information in this report is confidential or restricted.

## **Disclaimer**

Horizon Heritage Management attempts to give voice to the Aboriginal people who take part in surveys such as the one reported here, however, neither claim the knowledge revealed or vouch for the veracity of the ethnographic information given.

## **Copyright**

This report is the property of WAC, the Yaburara & Mardudhunera People and Horizon Heritage Management. The copyright owners have given permission to BCIM to use the contents of the report.

## **Acknowledgements**

Horizon Heritage Management acknowledges the input and participation of WAC and the Yaburara & Mardudhunera People Native Title Holders and BCIM representatives; Jacqui Jones and Amanda Billotti for this survey.

## **Abbreviations**

ACMC	Aboriginal Cultural Material Committee
AHA	<i>Aboriginal Heritage Act (1972)</i>
BCIM	BCI Minerals Limited
DPLH	Department of Planning, Lands and Heritage
GIS	Geographic Information System
GPS	Global Positioning System
MGA	Map Grid of Australia
NTC	Native Title Claimant Group
WAC	Wirrawandi Aboriginal Corporation
WGS	World Geodetic System
YM	Yaburara & Mardudhunera People

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## **1. PROJECT BRIEF & BACKGROUND**

### **1.1 Brief**

Horizon Heritage Management was engaged by WAC to undertake an Aboriginal heritage survey with representatives of the Yaburara & Mardudhunera native title holders for Miscellaneous Licence L08/325 at the Mardie Salt & Potash Project, south of Karratha, Western Australia.

### **1.2 BCI Minerals Limited**

BCI Minerals Ltd is rapidly advancing its 100% owned Mardie Salt & Potash Project, a potential Tier 1 project located on the West Pilbara coast. Mardie will produce 4.4Mtpa of high-purity salt and 120ktpa of sulphate of potash via solar evaporation of seawater.

### **1.3 Proposed Mardie Salt Project**

Mardie is a 100%-owned project that aims to produce 3.5Mtpa of high purity industrial grade sodium chloride salt and 75ktpa of sulphate of potash from solar evaporation of seawater. The Mardie site has all of the natural hydrological, climatic, topographical and geotechnical prerequisites for production of salt and SOP from solar evaporation.

### **1.4 BCIM Activity Notice**

Further to heritage surveys conducted between 2017 and 2022 BCIM is planning the following activity; a proposed new airstrip.

The below activities are planned to be undertaken within the following BCI Minerals tenements: M08/526 and E08/2740 (on pending Miscellaneous Licence L08/325).

- Geotechnical investigations to inform design of an airstrip.
- Construction of an airstrip with a runway length of approximately 1800m.

## **2. HERITAGE SURVEY OBJECTIVES**

The main objectives of this heritage survey are to:

- Assess and identify any known or potential risks that the proposed BCIM Mardie Salt & Potash Project may have on Aboriginal heritage and/or the landscape;
- Locate and record Aboriginal sites and any other Aboriginal heritage issues;
- Make recommendations regarding the management of the above sites, including any further research and/or consultation that may be required;
- Assist BCIM as the land user, to be more aware of how their proposed Mardie Salt & Potash Project could adversely impact Aboriginal heritage;
- Identify if any further research and/or consultation will be required to meet the requirements of the AHA;
- Capture and provide any GIS heritage constraints mapping results from the survey.

### **3. ABORIGINAL HERITAGE ACT**

#### **Aboriginal Heritage Legislation Requirements**

The Western Australian Aboriginal Heritage Act 1972 (AHA) was enacted to ensure that Aboriginal heritage to which the AHA applies could be appropriately protected and preserved. All Aboriginal sites in Western Australia are protected by the AHA, whether or not they have previously been identified or registered, provided that the site can be determined to meet the Section 5 definitions of the AHA.

A land user is obliged to comply with the provisions of the AHA and failure to do so may result in prosecution. Section 17 of the AHA provides that it is an offence to excavate, destroy, damage, conceal or in any way alter an Aboriginal site. Therefore land users should carefully evaluate how a proposed activity may affect Aboriginal heritage.

The Western Australian Aboriginal Heritage Act 1972 is concerned with Aboriginal sites of archaeological and ethnographic significance. The most important Sections of the AHA are provided below:

#### **Section 5**

An Aboriginal Site means any place to which the *Aboriginal Heritage Act 1972* applies by operation of Section 5 of the Act:

*(a) any place of importance and significance where persons of Aboriginal descent have, or appear to have, left any object, natural or artificial, used for, or made or adapted for use for, any purpose connected with the traditional cultural life of the Aboriginal people, past or present;*

*(b) any sacred, ritual or ceremonial site, which is of importance and special significance to persons of Aboriginal descent;*

*(c) any place which, in the opinion of the Committee, is or was associated with the Aboriginal people and which is of historical, anthropological, archaeological or ethnographical interest and should be preserved because of its importance and significance to the cultural heritage of the State;*

*(d) any place where objects to which this Act applies are traditionally stored, or to which, under the provisions of this Act, such objects have been taken or removed.*

#### **Section 17**

Section 17 of the Aboriginal Heritage Act 1972 outlines offences relating to Aboriginal sites.

A person who -

(a) excavates, destroys, damages, conceals or in any way alters any Aboriginal site; or

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

(c) commits an offence unless he is acting with the authorisation of the Registrar under section 16 or the consent of the Minister under section 18.

#### 4. ETHNOGRAPHIC BACKGROUND

The BCIM development project is located on the traditional land of the Yaburara & Mardudhunera People. This land lies within the Pilbara land geomorphological division which, according to Jutson, Pilbara land is a dissected plateau which comprises the Ashburton River basin and extends from the De Grey River immediately north of Port Hedland to the Ashburton River, with Onslow at its mouth; its western boundary the coast (Jutson, 1950: 56).

The Jaburara were found: 'At Nickol Bay and the peninsula leading north to Dolphin and Legendre islands,' but Tindale adds that they are: 'A small tribe, now extinct, with a separate dialect related to Ngarluma' (Tindale, 1974: 242). Ian Howie-Willis (1994a: 508) describes the 'Flying Foam Passage massacre' of 1868, an event that explains the 'small family' recorded by Tindale. Nonetheless, there are still people who identify themselves as Jaburara today.

Tindale locates the 'Mardudunera' on the:

Coastal plain north of the Fortescue River; north to visited islands of the Dampier Archipelago on log rafts; inland only to foot of ranges. These are perhaps the people described by King, (1827:I:38) [cited as 1826 in the Bibliography, (Tindale 1974: 369)] as tide riding on logs near Lewis Island.

The 'Martuthunira' did not practice circumcision but sent their young men to the Yindjibarndi and the Kurrama to experience that rite (Howie-Willis, 1994b: 667). The coastal people live outside the circumcision line - mapped independently by Tindale (1974) and Daisy Bates (c. 1910) - and did not practice that rite, although some groups began to adopt it after European contact, and some resisted the innovation. Hence the Mardudunera/Martuthunira were reported as not practicing the rite, whereas the Kurrama inland practiced it (*cf.* Gray, 1979: 173 below).

Archaeological evidence for the Indigenous occupation of the Pilbara is abundant. The Burrup Peninsula is identified as one of the 'major rock art regions' of Australia (Flood, 1995: 148). Throughout are scattered old campsites and rock overhangs. Many of the latter contain a rich suite of engravings (petroglyphs):

The art of the engravers reaches its height in the Pilbara region of Western Australia. There the developments of this art medium can be seen in all its richness and variety. Ancient geometric figures, concentric circles, tracks and lines have weathered back to the same dark colour as the parent rock, a process that takes many thousands, even tens of thousands, of years, suggesting great antiquity. (Flood, 1995: 278).

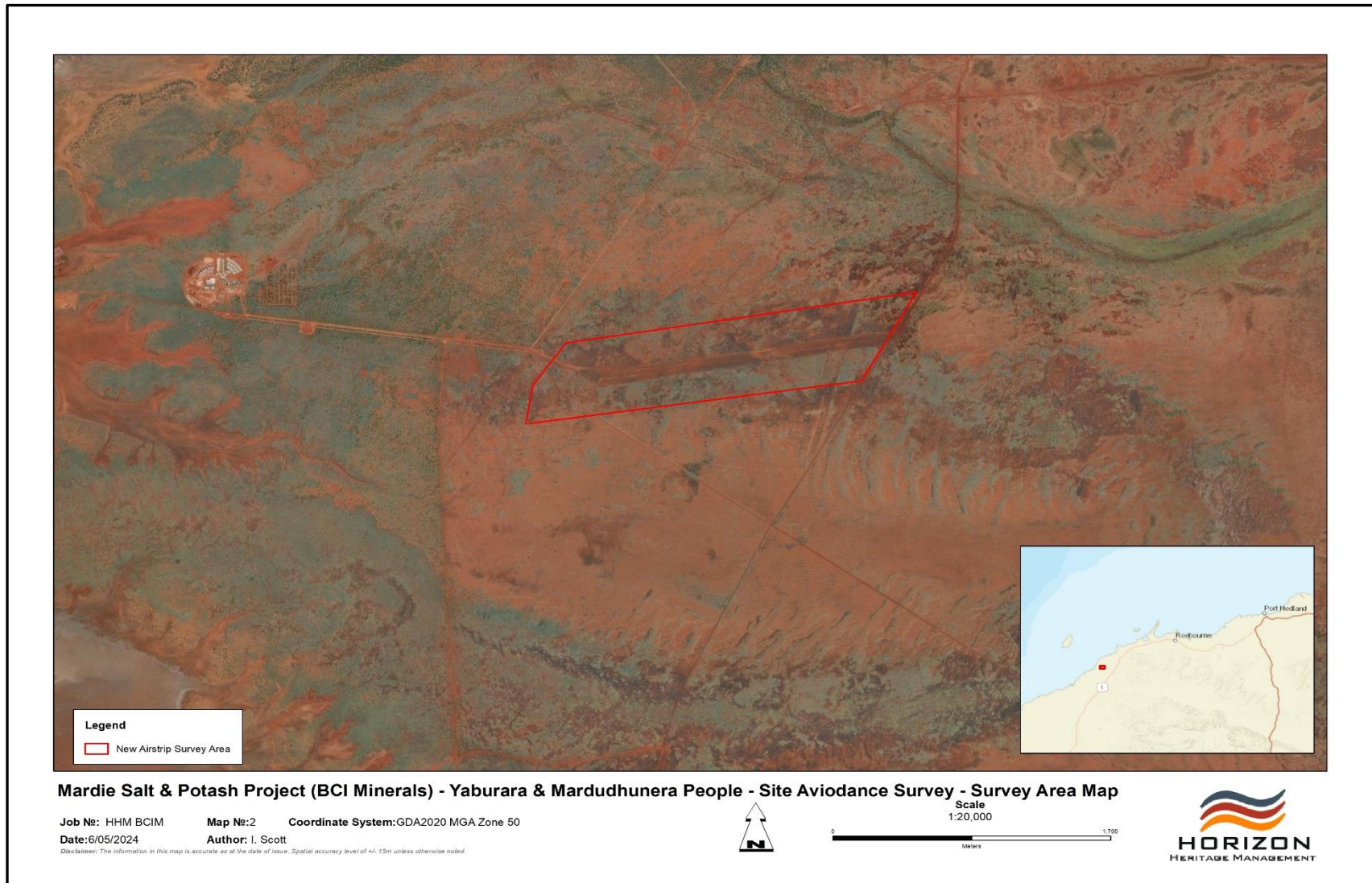
Howie-Willis notes that land mammals were hunted by groups living inland, whereas people such as the Martuthunira had a maritime economy, hunting fish, dugong and turtle, using raftlike canoes, and trading human hair belts with their neighbours the Kurrama and Yindjibarndi in exchange for boomerangs, because wood was scarce on the coast (Howie-Willis, 1994k: 667).

### ***Continuities of the Sacred***

The people of the Pilbara coast and inland areas used existing links through trade in goods and ritual knowledge between groups along what are usually called Dreaming tracks. Dreaming tracks – sometimes called ‘story lines’ – have been identified throughout Australia. A story line, as the term implies, usually concerns one or more creative spirit ancestors, and other human and non-human beings, that travelled across the landscape. During those travels, the ancestral spirits had encounters with one another and created land features such as the river systems, waterholes, hills and other natural features.

In Aboriginal Australia, a story line or Dreaming track often passes through the territories of local groups that together comprise ‘tribe’ or language groups, and is not known in its entirety by the people of any one place – except perhaps by knowledgeable senior men. The known ‘episode’ ‘belongs’ to one elder or more who reserve the right to tell/sing the story. Episodes of a longer story are shared at group Law meetings (connected with ceremonial and ritual) during which one elder after another will sing/recite the part of the story that is their right. Although individuals may have a good knowledge of an episode, several episodes, or even a whole Dreaming story, they are not entitled to tell it to another without permission and formal performance because they do not ‘own’ it.

### Map 1: BCIM Miscellaneous Licence L08/325 Survey Map



## 5. DPLH ABORIGINAL HERITAGE INQUIRY SYSTEM

Horizon Heritage Management utilised the Aboriginal Heritage Inquiry System (AHIS) of the Department of Planning, Lands and Heritage (DPLH) to research and determine which heritage survey reports and site files held by the DPLH would be informative to this site avoidance heritage survey.

A search of the DPLH online AHIS register of Aboriginal sites and heritage survey reports was conducted on the 23<sup>rd</sup> of April 2024. The search was based upon the Mardie Salt & Potash Project survey area as supplied by BCIM in a SHP file.

The research determined both the registered ethnographic and archaeological sites and Other Heritage Place's (OHP) in and around the development area and the nature and frequency of previous heritage surveys. In turn, the potential impact of the development proposal upon these sites and places and the likelihood of identifying additional sites and heritage issues were assessed.

A review of the DPLH AHIS identified one registered Aboriginal site immediately adjacent to the Miscellaneous Licence L08/325 survey area.

### 5.1 DPLH Registered Site and Other Heritage Places

A definition of the terminology provided by the DPLH AHIS is also provided below.

#### Terminology

**Place ID / Site ID:** This a unique ID assigned by the DPLH to the place or site.

**Status:**

**Other Heritage Place which includes:**

- **Stored Data / Not a Site:** The place has been assessed as not meeting Section 5 of the *Aboriginal Heritage Act 1972*.

- **Lodged:** Information has been received in relation to the place, but an assessment has not been completed at this stage to determine if it meets Section 5 of the *Aboriginal Heritage Act 1972*.

**Open:** No Restrictions - Availability of information (other than boundary) that the Department of Aboriginal Affairs holds in relation to the place is not restricted in any way.

The DPLH registered site immediately adjacent to the Miscellaneous Licence L08/325 survey area is presented in the following table, with the individual site file summary below.

**Table 1: DPLH Registered Site**

DPLH SITE ID & NAME	SITE TYPE	STATUS	LOCATION
10351 Wiruwandi Plain	Mythological	Registered, Open, No restrictions	397613mE 7651253mN Zone 50 [Reliable]

### DPLH 10351 Wiruwandi Plain

This registered mythological site was recorded by Dr Palmer in 1975 and later by Brown in 1979. It extends from Wearawandie Well in the south to Mardie Wool Shed in the north and west of the Mardie-North West Costal Highway Road. It forms part of the *Wiruwandi* (Boomerang Wood) Dreaming which also includes a hill and a pool. The Plain is located adjacent to the Mardie Salt & Potash Project. This site has significance to the Yaburara & Mardudhunera people as a mythological dreaming story site.

## 5.2 DPLH Heritage Survey Reports

There are fifteen DPLH heritage survey reports which relate to the registered Aboriginal site:

**Table 2: DPLH Heritage Survey Reports**

REPORT ID	REPORT TITLE	AUTHOR
17509	Dampier to Perth Natural Gas Pipeline Route: A Survey for Aboriginal Sites. March 1979.	Dept of Aboriginal Sites
18497	Preliminary ethnographic report on MLs 08/118 to 08/130	O'Connor, Rory
19019	Summary report on Aboriginal heritage investigations proposed Dampier to Bunbury natural gas pipeline corridor widening project : prepared to assist the Aboriginal Cultural Material Committee	McDonald, Hales and Associates
19023	Report on Aboriginal heritage investigations : proposed DBNGP pipeline corridor widening project	McDonald, Hales and Associates
19247	Site identification survey under the Aboriginal Heritage Act (1972) of exploration license E08/1138 in the Mardie - Balmoral station area of the Pilbara Region of WA	Parker, Ronald T
22304	Working document to identify Aboriginal Heritage Issues to facilitate risk management strategies for stage 5 of the Dampier to Bunbury Natural Gas Pipeline Duplication Project	Australian Interaction Consultants
23826	Site Avoidance Heritage Survey Report of the Proposed Chevron DOMGAS Pipeline at Mardie Station, WA	Fordyce, Ben
28215	Heritage Monitoring Report of Aboriginal Sites within Loop 0 of DBNGP Stage 5B, Karratha Station to Mardie Station, WA : volume i	Australian Interaction Consultants

28216	Heritage Monitoring Report of Aboriginal Sites within Loop 0 of DBNGP Stage 5B, Karratha Station to Mardie Station, WA : volume ii	Australian Interaction Consultants
102612	A Survey for Aboriginal Archaeological Sites on some Proposed Construction Facilities (Northern Section) Dampier to Perth Natural Gas Pipeline.	Brown, S.
103007	A Report of an Ethnographic and Archaeological Survey for Aboriginal Sites Telecom Fibre Optic Cable, Karratha to Cane River. April 1990.	Harris, J.
105645	Report on an Archaeological Survey for Aboriginal Sites Cape Preston, Western Australia	McGann, Sally
200218	Site Identification Survey Report of Iron Ore Holdings Limited Proposed Haul Road Stage 2, South of Karratha, Western Australia: November 2014 {TBD}	Fordyce, Ben & Lafrentz, Damien
201197	Work Program Clearance for the Yaburara & Marthudunera People and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, December 2018.	Damien Lafrentz, Philippa Hunter & Nigel Tonkin
201219	Aboriginal Heritage Survey for the Wirrawandi Aboriginal Corporation and BCI Minerals Limited for the proposed Mardie Salt Project, south of Cape Preston, WA, July 2020	Damien Lafrentz & Nigel Tonkin

### 5.3 Site Types

The following are the main site types associated with the registered Aboriginal site and Other Heritage Place located at the Mardie Salt & Potash Project. This list is not exhaustive;

- ***Artefact Scatters / Shell Scatter***

These sites are concentrations of cultural material associated with a wide range of activities, such as food processing, tool manufacture and seasonal camping. These sites can be small, localised scatters focused around single stone reduction episodes, or larger, higher density scatters containing hundreds or perhaps thousands of artefacts or shells over a large area.

- ***Ethnographic***

Sites which are ethnographic in nature are associated with an ongoing dreamtime story or ceremonial / law practice important to the local Aboriginal People's connection to country. They often follow landscape features such as rivers or mountains and in some cases extend over thousands of kilometres.

- ***Mythological***

A place that is connected to spirit ancestors, in their various manifestations, of the 'Dreamtime' which continues to be important and of special significance to persons of Aboriginal descent.

- ***Skeletal material/Burial***

A place where Aboriginal skeletal material is buried and/or where mortuary practices occurred.

- ***Historical***

A place that has historical associations with Aboriginal people and may or may not contain physical evidence of those associations.

A distinction is often drawn between relatively dense, localised concentrations of cultural material and the sparsely distributed archaeological materials which usually surround them. The relatively sparse scatter of stone artefacts is usually known as a background scatter or isolated artefacts, while concentrations of artefacts are termed sites or places.

#### **5.4 Summary Discussion**

The heritage places located within the project area have mainly been identified during heritage surveys undertaken for the purposes of infrastructure development (gas pipelines) and mineral and resource projects. The purpose of heritage surveys is to establish the heritage potential in previously unsurveyed areas. Heritage surveys have taken place in the vicinity identifying ethnographic and archaeological sites and places in natural or minor disturbed environments. The Mardie Salt & Potash Project area has not been impacted by any prior significant disturbance other than cattle movement and natural processes and it is extremely likely that Aboriginal heritage values still exist due to proximity to the resource rich coastal zone and sources of freshwater like Mardie Creek and Peters Creek.

## 6. LANDSCAPE FEATURES

Landscape features, which possibly contain Aboriginal sites include but are not limited to:

- rock outcrops;
- caves;
- foreshores and coastal dunes;
- ranges and hills;
- areas of bio-geographical significance, such as natural wetlands;
- permanent and semi-permanent waterholes, springs, gnamma holes, and watercourses;
- some hill and mound formations; and
- areas with potential archaeological deposit, such as rock shelters, caves, alluvial terraces, dune deposits and other relevant geo-morphological features.

### Why Assess the Landscape?

The possibility of a landscape containing Aboriginal sites will differ between land which has had considerable previous land use, for example intensive land clearing or development, and land which is largely in its natural state or is remote and undisturbed by previous development.

Similarly, some landforms are more likely than others to serve as an indicator of Aboriginal traditional activity than others. Landscape features which may contain Aboriginal sites and should be approached with some caution include, but are not limited to: rock outcrops, rock shelters, caves, alluvial terraces, foreshores and coastal dunes, ranges and hills, natural wetlands, waterholes, springs, gnamma holes, rivers, creeks, streams, swamps, hills and mound formations, or areas with potential archaeological deposits. An assessment of the area where an activity is proposed may reveal evidence (artefacts or other signs) about previous Aboriginal traditional activity.

### Generalised Landscape Review

Landscape features can often be predictors of areas of likely cultural activity. In the coastal Pilbara, rivers, waterways and sand dune systems represent important landscape features and carry a high level of heritage risk. Extensive heritage sites with a high level of complexity are often located around permanent and semi-permanent water sources. Long term camping places, named pools with ceremonial and mythological significance and law grounds are usually located where water is readily available on a seasonal or permanent basis. Ephemeral watercourses present less of a heritage risk, and in areas of unconsolidated drainage heritage sites tend to be small scale and localised, representing single or minimal use camping or hunting places.

Areas of high relief, such as ranges, hills or mesas present a medium level of risk, dependent again on the proximity to water, nature of underlying geology and presence or absence of rock shelters. Heritage sites in these areas tend to be associated with resource exploitation, such as quarrying or primary reduction, hunting sites or seasonal camps. Named hills may

carry an associated ceremonial or mythological significance, often gender specific, and be utilised as law grounds or for initiation.

Flat, open country marking the transition between river systems and ridgelines tends toward a low level of heritage risk as these areas represent areas of minimal use. Small scale camping or hunting outposts utilised on a seasonal basis when a particular resource is available may be present. Generally though, these areas only contain a sparse background scatter of cultural material, associated with the transitional nature of a migratory population.

### **Mardie Salt Landscape Review**

The development footprint at the coast is predominantly a low lying coastal area of topographic relief with predominantly sparse vegetation with some areas of questionable land integrity due to natural processes (tidal movement) disturbance. That said there are some landscape areas that exhibit coastal features (sand islands) which have remained free from natural disturbance and pastoral activities (cattle). The main areas of terrestrial land has dense vegetation ranging from spinifex, mesquite, Acacia and eucalyptus varieties. Some drainage channels and or creeks are found across the survey areas.

## **6.1 Site Distribution**

Analysis of the DPLH AHIS results and landscape features indicates the following possible site distribution for the Mardie Salt & Potash Project area.

- ***Riverine Environment***

Peters Creek and Mardie Creek with their irregular flowing events and semi-permanent and permanent pools would have provided valuable water and lithic resources. Larger habitation sites would likely be found adjacent to fresh water features.

- ***Spinifex Sand Plains***

Devoid of focal water sources it is likely only used as hunting or travelling country and therefore would likely have only opportunistic stand-alone events with a small amount of stone artefact components.

- ***Coastal Dune Features***

The chain of coastal dune features around the periphery of the project areas would have offered suitable camping areas with some subsistence opportunities.

- ***Coastal Mud Flats***

The coastal tidal zone of the project area would have offered bountiful subsistence opportunities due to the reliability of marine resources (shell fish, fish, turtles, etc.).

## 7. IDENTIFICATION OF KEY STAKEHOLDER GROUPS

The key community and government stakeholder groups for the Mardie Salt & Potash Project have been identified as the following:

### ***Wirrawandi Aboriginal Corporation (Yaburara & Mardudhunera People)***

The 13,940 square kilometre Yaburara & Mardudhunera People application was lodged in August 1996. After a long and arduous 20 year plus period in July 2018 the Yaburara & Mardudhunera People were legally recognised as the determined native title holders. Native Title Holder means there has been a determination by the Federal Court that the Yaburara & Mardudhunera People hold the native title rights and interests over a particular area of land and/or waters. The Yaburara & Mardudhunera People are the legally determined native title holders for their traditional lands.

Representatives of the Yaburara & Mardudhunera People have a history of cooperatively participating in and undertaking heritage surveys under the *Aboriginal Heritage Act (1972)* for the purposes of proponents within their traditional country and native title determined boundary.

The Yaburara & Mardudhunera group mainly consists of members from the following families: Boona, Wally, Cosmos and Cooper. These people have a deep and ongoing connection with their traditional land. All of the families have lived on or near their traditional lands for a long period of time.

**Table 3: WAC Native Title Holder Group**

NATIVE TITLE HOLDERS	N.T.C. NUMBER	WAC CONTACT PERSON
Yaburara & Mardudhunera People	WC96/89 Determined July 2018	Noel Dodd

### ***Mardie Station***

Mardie Station, commonly referred to as Mardie, is a pastoral lease that operates as a cattle station south of Karratha in the Pilbara region of Western Australia. The property occupies an area of 225,000 hectares and is near the mouth of the Fortescue River. Mardie Station is owned by mining company Citic Pacific.

### ***Department of Planning, Land and Heritage***

The Department of Planning, Land and Heritage (DPLH) works with Aboriginal people to promote their culture and to protect and manage places and objects of significance to Aboriginal heritage. The DPLH also provides advice relating to the management of cultural heritage and the submission of documentation relating to legislative approvals. The *Aboriginal Heritage Act (1972)* protects all Aboriginal heritage sites in Western Australia, whether they are registered with the DPLH or not. Consent is required from the Minister for any activity which will negatively impact Aboriginal heritage sites.

## 8. ABORIGINAL HERITAGE SURVEY

The site avoidance Aboriginal heritage survey was undertaken on the 7<sup>th</sup> of May 2024. The survey team comprised three Yaburara & Mardudhunera Traditional Owners and two Horizon Heritage Consultants.

**Table 4: Survey Date and Participants**

SURVEY DATE	YABURARA & MARDUDHUNERA TRADITIONAL OWNERS	HORIZON HERITAGE MANAGEMENT	BCIM
7 <sup>th</sup> May 2024	Ian Wally Terrance Boona Audrey Cosmos	Damien Lafrentz Rhys Lucey	Amanda Billotti

**Plate 1: Heritage survey team 07/05/24.**



In the completion of this project, Horizon Heritage Management and the Yaburara & Mardudhunera People conducted a site avoidance Aboriginal heritage survey under the *Aboriginal Heritage Act (1972)* of the BCIM survey area. This survey type was chosen to determine whether the proposed development will impact upon Aboriginal sites or places.

The main objectives of the ethnographic and archaeological Aboriginal heritage survey will be to provide BCIM with cultural heritage management information and recommendations.

## 9. SURVEY METHODOLOGY

Due to the small size and good accessibility for the survey area the heritage survey was conducted utilising pedestrian transects. The survey team worked as one large team (one BCIM representative, two Horizon Heritage Consultants and three YM People) undertaking pedestrian transects of the survey area. This methodology allowed the survey team the best opportunity to assess the land underlying the survey area for any heritage sites or places. This methodology was endorsed by the Yaburara & Mardudhunera Traditional Owners present during the survey.

The survey area has been subject to historical disturbance through pastoral activities and infrastructure (fence and tracks) and an existing airstrip.

## 10. ABORIGINAL HERITAGE SURVEY RESULTS

Horizon Heritage and the Yaburara & Mardudhunera Traditional Owners identified no Aboriginal sites or places during the heritage survey of Miscellaneous Licence L08/325. The Yaburara & Mardudhunera Traditional Owners have no heritage concerns with Miscellaneous Licence L08/325 and a new proposed new airstrip.

One registered site DPLH 10351 Wiruwandi Plain is immediately adjacent to the Miscellaneous Licence L08/325 survey area. This site is protected under the AHA and must be avoided from any BCIM impacts unless free, prior and informed consent from the YM People and consent under Section 18 of the AHA is granted by the Minister for Aboriginal Affairs.

**Plate 2: YM Traditional Owners assessing L08/325.**



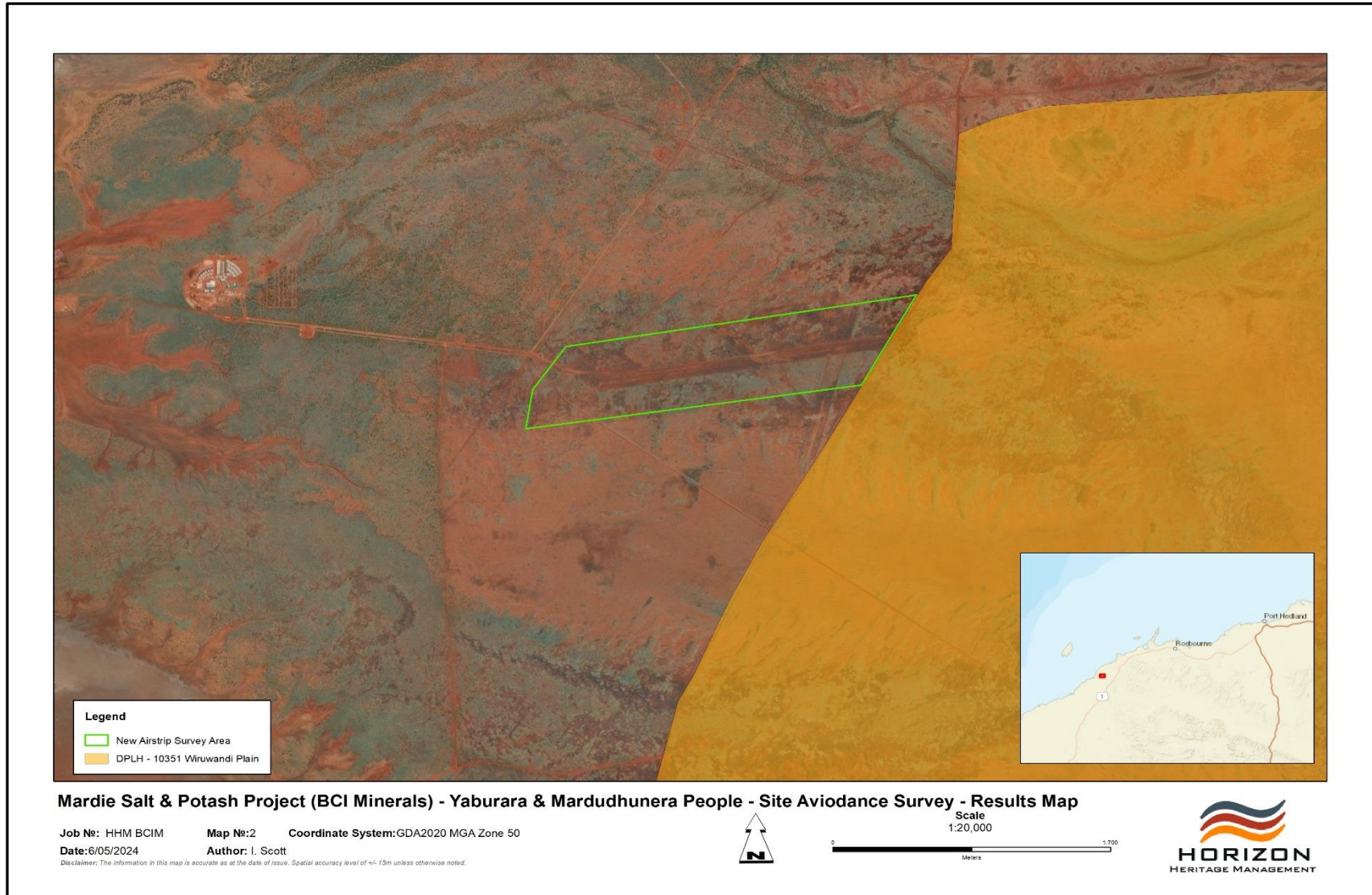
**Plate 3: Typical vegetation within L08/325.**



**Plate 4: Existing Historical Mardie Station Airstrip.**



## Map 2: BCIM Miscellaneous Licence L08/325 Survey Results Map



## 11. CONCLUSIONS

Horizon Heritage Management and the Yaburara & Mardudhunera People make the following conclusions:

1. Aboriginal heritage site and places represent Australian history and it is important for current and future generations that they are conserved and protected.
2. BCIM are fulfilling their obligations under the land access agreement with the Yaburara & Mardudhunera People and the WA *Aboriginal Heritage Act (1972)* to assess the land for Aboriginal cultural heritage values.
3. The Yaburara & Mardudhunera Traditional Owners have no heritage concerns with Miscellaneous Licence L08/325.
4. One registered site DPLH 10351 Wiruwandi Plain is immediately adjacent to the Miscellaneous Licence L08/325 survey area. This site is protected under the AHA and any disturbance will require Section 18 consent under the AHA. BCIM must avoid the registered site DPLH 10351 Wiruwandi Plain to prevent any breaches of Section 17 of the AHA.

## 12. RECOMMENDATIONS

Horizon Heritage Management and the Yaburara & Mardudhunera People make the following recommendations:

1. BCI Minerals Limited can proceed with development activities (proposed new airstrip) within Miscellaneous Licence L08/325 the Yaburara & Mardudhunera Traditional Owners have given heritage consent for this activity to be undertaken.
2. In the instance of any previously unrecorded heritage places being identified during the course of infrastructure development activities, BCI Minerals Limited should avoid the area and must contact the Yaburara & Mardudhunera People through their RNTBC the Wirrawandi Aboriginal Corporation and/or Horizon Heritage Management.
3. If human remains, skeletal materials that may be human or materials that may be a human grave, are uncovered within the cleared work program areas BCI Minerals Limited and its contractors must stop work immediately and the materials and the area must be left undisturbed. The Yaburara & Mardudhunera People through their PBC the Wirrawandi Aboriginal Corporation and/or Horizon Heritage Management must be informed immediately.
4. BCI Minerals Limited keeps the Yaburara & Mardudhunera People through their RNTBC the Wirrawandi Aboriginal Corporation informed of any further developments on their native title determined traditional country.
5. All BCI Minerals Limited staff and contracting personnel are made fully aware of their obligations under the *Aboriginal Heritage Act (1972)*.

### 13. REFERENCES

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