



**JOHN
HOLLAND**

INLAND RAIL

ILLABO TO STOCKINBINGAL PROJECT

I2S | Aboriginal Community and Stakeholder
Engagement Strategy

Document Number: 5-0019-220-PMA-00-ST-0001

Document Status: Issued for Use

Revision: 0



Document Control

Document Title	Aboriginal Community and Stakeholder Engagement Strategy	
IRPL Document No.	5-0019-220-PMA-00-ST-0001	
Prepared By	Fiona Leslie, MTS Heritage Pty Ltd	
Document Owner	Daniel Lidbetter (Environmental Approvals Manager)	
	REVIEWED BY	APPROVED BY
Name	Daniel Lidbetter	Andy Robertson
Title	Approvals Manager	Environment and Sustainability Advisor
Signature Date	<div><div>JOHN HOLLAND</div><div><div>Document Number</div><div>5-0019-220-PMA-00-ST-0001</div></div><div><div>Revision</div><div>0</div></div><div><div>Approved</div><div>Mr Daniel Lidbetter - John Holland Pty Ltd</div><div>Jul 29, 2025, 12:39 PM GMT+10:00</div><div>This review has been completed using Aconex Workflow for the Inland Rail - Illabo to Stockinbungal (I2S) Project.</div></div></div>	
	<div><div>JOHN HOLLAND</div><div><div>Document Number</div><div>5-0019-220-PMA-00-ST-0001</div></div><div><div>Revision</div><div>0</div></div><div><div>Approved</div><div>Mr Andy Robertson - John Holland Pty Ltd</div><div>Jul 29, 2025, 4:11 PM GMT+10:00</div><div>This review has been completed using Aconex Workflow for the Inland Rail - Illabo to Stockinbungal (I2S) Project.</div></div></div>	



Revision History

REVISION	DATE ISSUED	DESCRIPTION
A	17/03/2025	Issued for Review
B	24/04/2025	Issued for Review
C	17/06/2025	Issued for Review
0	29/07/2025	Issued for Use



Table of Contents

1	Introduction	5
1.1	Inland Rail Program overview	5
1.2	Project scope	5
1.3	Project timeline	6
1.4	Purpose of this document	7
1.5	Report content	7
1.6	Definitions and abbreviations	8
2	Background	9
2.1	Guidelines and policies	9
2.1.1	National Agreement on Closing the Gap	9
2.1.2	OCHRE—NSW Government Plan for Aboriginal Affairs: Education, employment and accountability	9
2.1.3	Connecting with Country Draft Framework.....	10
2.1.4	Designing with Country Discussion Paper.....	10
2.1.5	Aboriginal Cultural Heritage Consultation Requirements for Proponents	11
2.1.6	Ask First: A Guide to Respecting Indigenous Heritage and Places	11
2.2	Inland Rail specific plans and policies	11
2.2.1	Inland Rail Community Communications Strategy I2S	11
2.2.2	Inland Rail First Nations Participation Plan	12
2.3	John Holland project specific plans	13
2.4	Aboriginal community consultation for the project	13
2.4.1	Aboriginal community consultation for the Aboriginal Cultural Heritage Assessment Report (ACHAR)	13
2.4.2	Summary of known cultural sites and values	14
2.4.3	Aboriginal community consultation for the Construction Stage of the Project ..	14
3	Engagement objectives and principles	16
4	Stakeholders.....	17
5	Engagement opportunities	19
5.1	Broader community engagement	19
5.2	Consultation on the Construction Environmental Heritage Management Sub-Plan	20
5.3	Engagement as part of the Aboriginal Cultural Values Plan	21
5.4	Engagement and involvement in the Archaeology Program	22
5.5	Engagement and support of Indigenous businesses	23
6	Strategy and implementation	24
7	References	26

1 Introduction

This Aboriginal Community and Stakeholder Engagement Strategy has been developed to outline proposed communication and engagement with Aboriginal stakeholders for works associated with the Inland Rail – Illabo to Stockinbingal (I2S) Project (the project). The strategy covers the design and construction phases of the project, including low impact works, construction works and 12 months following completion of construction.

This introduction provides an overview of the Inland Rail program (Section 1.1), the project scope (Section 1.2) and the purpose and contents of this report (Section 1.3).

1.1 Inland Rail Program overview

The following program overview is reproduced from the I2S EIS Engagement Report, 2022

Inland Rail Pty Ltd (Inland Rail, IRPL) is an Australian Government-funded project that forms part of the Department of Infrastructure, Transport, Regional Development Communications and the Arts (DITRDCA) portfolio. In late 2013, the former Deputy Prime Minister, the Hon Warren Truss MP, established the Inland Rail Implementation Group to provide high-level leadership for the implementation of Inland Rail. IRPL has been appointed to deliver Inland Rail in partnership with the private sector.

Inland Rail is a once-in-a-generation project connecting regional Australia to domestic and international markets, transforming the way we move freight around the country. It will complete the 'spine' of the national freight network between Melbourne and Brisbane, via regional Victoria, New South Wales (NSW) and Queensland.

This 1,700-kilometre line is the largest freight rail infrastructure project in Australia. The objectives of the Inland Rail Program as stated in the Service Offering are to:

- provide a backbone rail link between Melbourne and Brisbane to serve future rail freight demand and stimulate growth for interstate and regional/bulk rail freight } provide an increase in productivity that will benefit consumers through lower freight transport costs
- provide a step-change improvement in rail service quality in the Melbourne–Brisbane corridor to deliver a freight rail service that is strongly competitive with road
- improve road safety, ease congestion and reduce environmental impacts by moving freight from road to rail
- bypass bottlenecks on the congested metropolitan Sydney rail network, and free up train-path capacity for other services on the coastal route, including passenger services through the Sydney region and bulk freight through the NSW Southern Highlands
- act as an enabler for regional economic development along the Inland Rail corridor.

1.2 Project scope

The Inland Rail - Illabo to Stockinbingal (I2S) Project is a 39-kilometre greenfield section where a new track will be constructed in a newly established rail corridor, just east of Illabo, tracking north to Stockinbingal, NSW.

This new section of rail corridor will provide a direct route from Illabo to Stockinbingal through to the existing Forbes line. The line will bypass Cootamundra and the steep and windy Bethungra Range with the Bethungra Spiral.

Bypassing the Bethungra Spiral will improve reliability and reduce travel distance by approximately 23 kilometres.

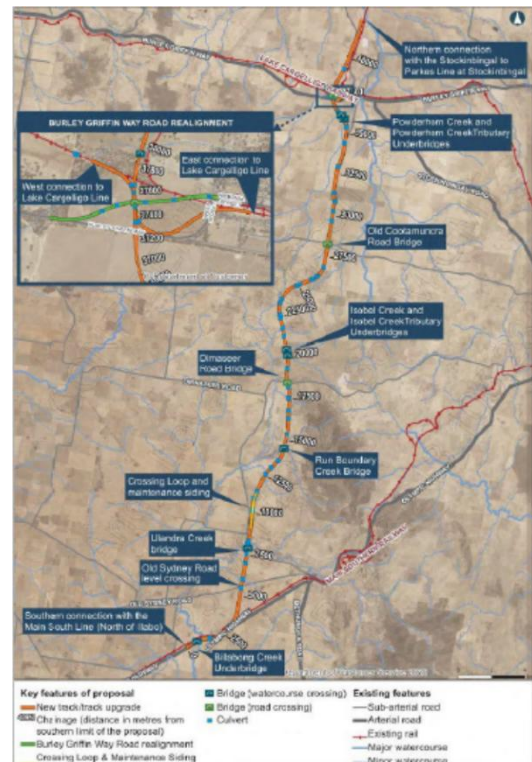
Burley Griffin Way will undergo a major realignment and a new road over rail bridge will be built. This will enable the closure of one of the existing rail level crossings in Stockinbingal, improving safety. In

addition, Ironbong Road will undergo a minor realignment around the proposed level crossing to improve safety.

The project connects with the Albury to Illabo (A2I) and Stockinbinal to Parkes (S2P) enhancement projects.

This design and construct project works will include:

- New track construction
- Earthworks
- Bridge construction
- Culvert and drainage installation
- Road works
- Activated and passive level crossings
- Installation of rail systems
- Utility Adjustments



1.3 Project timeline

Table 1 provides an outline of project milestones from project commencement to project approval.

Table 1: Project Timeline

Year	Milestone
2015 - 2019	Preliminary engagement with stakeholders and reference design commenced.
2018	In August 2018, the project was classified as a 'Controlled Action' under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)
2020	In May 2020, the project was declared State Significant Infrastructure (SSI) and, as a result, commenced the Environmental Impact Statement (EIS) approvals pathway.
2021	In March 2021, the project was upgraded to Critical State Significant Infrastructure (CSSI) and the environmental assessment requirements of the Secretary of the (then) NSW Department of Planning, Industry and Environment (DPIE) (the SEARs) were issued in April 2021.



Year	Milestone
2022	From mid-2021 and into 2022, the reference design and EIS were progressed and finalised. The I2S EIS was placed on public exhibition between 14 September and 26 October 2022.
2023	In November 2023, a Response to Submissions Report was submitted to DPHI who subsequently made the report public on 27 November 2023.
2024	In September 2024, the CSSI approval was granted by the NSW Minister for Planning and Public Spaces

1.4 Purpose of this document

The purpose of this Aboriginal Community and Stakeholder Engagement Strategy (the report) is to outline the objectives, principles and strategies for consultation and engagement with Aboriginal Stakeholders during the delivery of the I2S Project. It has been prepared to fulfil Conditions E131, E132 and E133 of the Critical State Significant Infrastructure (CSSI) approval (Application No. SSI-9406) issued on 4 September 2024.

Table 2 below includes the conditions that relate to the Aboriginal Community and Stakeholder Strategy included in the CSSI Approval, with reference to how I2S intends to comply.

Table 2: CSSI Conditions and Compliance

CSSI Approval Condition		Applicable Section in this Plan
E131	The Registered Aboriginal Parties (RAPs) must be kept involved in the CSSI in accordance with Conditions B1 and B2 and the Aboriginal Community and Stakeholder Engagement Strategy required by Condition E132 . The RAPs must continue to be provided with regular opportunities to be consulted about the Aboriginal cultural heritage management requirements of the CSSI.	Section 6 of this Plan
E132	Prior to commencement of construction, an Aboriginal Community and Stakeholder Engagement Strategy shall be finalised and implemented, in consultation with Heritage NSW, relevant RAPs, and LALCs. The Strategy will detail and include, but not be limited to, the consultation process with Aboriginal stakeholder for the integration of Aboriginal Cultural Values into the CSSI.	This Plan
E133	An Aboriginal Cultural Values Plan....will be developed in conjunction with the Aboriginal Community and Stakeholder Engagement Strategy. The strategy will detail the consultation process with Aboriginal stakeholders and identify the Aboriginal Cultural Values to be incorporated into the design of the CSSI.	This Plan

1.5 Report content

This report includes the following information:

- Background information about relevant guidelines and policies and previous Aboriginal community consultation for the project (Section 2);
- The objectives and principles that guide Aboriginal community engagement (Section 3);
- Details about identified Aboriginal Stakeholders (Section 4);
- Engagement opportunities (Section 5); and
- A proposed engagement strategy and implementation (Section 6).



1.6 Definitions and abbreviations

Definitions and abbreviations to be applied to the [I2S | Aboriginal Community and Stakeholder Engagement Strategy](#) are listed below.

Table 3: Definitions and Abbreviations

Term/Abbreviation	Definition
ACHAR	Aboriginal Cultural Heritage Assessment Report
ARTC	Australian Rail Track Corporation
CoA	Condition of Approval
CSSI	Critical State Significant Infrastructure
EIS	Environmental Impact Statement
I2S	Illabo to Stockinbingal
IRPL	Inland Rail Pty Ltd
I2S	Illabo to Stockinbingal Project
Knowledge Holder	An Aboriginal person recognised by their community as holding cultural knowledge about places, history can values (note such a person may be additional to a RAP, or the representative of the RAP)
LALC	Local Aboriginal Land Council
LGA	Local Government Area
NSW	New South Wales
RAP	Registered Aboriginal Party
Planning Secretary	Secretary of the Department of Planning, Housing and Infrastructure
The strategy	Aboriginal Community and Stakeholder Engagement Strategy



2 Background

This background includes a summary of relevant guidelines and policies that provide a context for Aboriginal community consultation and stakeholder involvement in the Inland Rail Project. It also provides project specific plans and background information about consultation that was conducted with the Aboriginal community to inform the Environmental Impact Statement (EIS), which was submitted to support the CSSI Application. It outlines consultation conducted for the current Construction Stage of the project and known cultural values.

2.1 Guidelines and policies

The following guidelines and policies descriptions have been reproduced from the Aboriginal Community and Stakeholder Engagement Preliminary Framework prepared by Inland Rail for the Narromine to Narrabri Project (Inland Rail, 2022: 2 - 5).

2.1.1 National Agreement on Closing the Gap

The *National Agreement on Closing the Gap* (Australian Government, 2020) (the National Agreement) has been prepared to enable Aboriginal and Torres Strait Islander people and governments to work together to overcome the inequality experienced by Aboriginal and Torres Strait Islander people, and achieve life outcomes equal to all Australians.

The National Agreement has 17 targets across the following outcome areas: education, employment, health and wellbeing, justice, safety, housing, land and waters, and languages.

The Closing the Gap in NSW: 2021-22 Implementation Plan (NSW Government, 2021) has overarching objectives outlining the work in partnership to develop, implement and monitor the plan, with the focus placed on Aboriginal and Torres Strait Islander self-determination. The priority reforms to transform the way government work with Aboriginal and Torres Strait Islander communities are:

- Formal partnerships and shared decision making
- Building the community controlled sector
- Transforming Government organisations
- Shared access to data and information at a regional level
- Employment, business growth and economic prosperity.

IRPL supports these priorities and identifies 'Employment, business growth and economic prosperity' as the priority that is best aligned with Inland Rail's business and to which it is most able to contribute.

2.1.2 OCHRE—NSW Government Plan for Aboriginal Affairs: Education, employment and accountability

In 2011 the NSW Government released the *OUCHRE (Opportunity, Choice, Healing, Responsibility, Empowerment) Plan* (NSW Government, 2011) to support strong Aboriginal communities in which Aboriginal people actively influence and fully participate in social, economic and cultural life.

The OCHRE Plan is focused on:

“revitalising and promoting language and culture, creating opportunities, increasing people’s capacity, providing choice and empowering people to exercise that choice, as well as giving them the tools to take responsibility for their own future” (NSW Government, 2011).

The OCHRE Plan has three terms of reference – education, employment and service delivery.

IRPL supports the aims and priorities of the OCHRE Plan and has developed specific strategies and policies that align with Inland Rail's business including social procurement, economic participation, employment and supporting pathways from education into meaningful employment (refer Section 2.2).

2.1.3 Connecting with Country Draft Framework

The *Connecting with Country Draft Framework* (Government Architect NSW, 2020a) was released in late 2020 for discussion. The Draft Framework is a guide for developing connections with Country that can inform the planning, design and delivery of built environment government projects in NSW. The document aims to help all of us – Aboriginal and non-Aboriginal people –work together collectively, respectfully, and with open minds to unite our complementary knowledge. The Draft Framework includes a proposal to consider project life cycles with an Aboriginal perspective.

The Draft Framework emphasises that *“because cultural connections with Country are different for all Aboriginal people and communities, all projects and their strategy to connect with Country must be guided by Aboriginal people who are acknowledged by their communities as knowledge-holders for Country, or the nominated spokespeople for knowledge-holders (for example, local area land councils)”*.

The Draft Framework identifies the following commitments to Country to be considered in government projects:

1. We will respect the rights of Aboriginal peoples to Indigenous cultural intellectual property, and we will support the **right of Country to be cared for**.
2. We will prioritise Aboriginal people’s relationship to Country, and their cultural protocols, through education and enterprise by and for Aboriginal people.
3. We will prioritise **financial and economic benefits** to the Country where we are working, and by extension to the Traditional Custodians of that Country.
4. We will share the **tangible and intangible benefits** with the Country where we are working, and by extension the Traditional Custodians of that Country, including current and future generations.
5. We will respect the diversity of Aboriginal cultures, but we will prioritise the local, place-specific **cultural identity of the Country** we’re working on.

Aboriginal people will determine the representation of their cultural materials, customs and knowledge.
6. We will prioritise **recognition and responsibility of Aboriginal people**, supporting capacity building across Aboriginal and non-Aboriginal community, and across government project teams.
7. We will support Aboriginal people to continue their practices of managing land, water, and air, through their **ongoing reciprocal relationships with Country**.
8. We will create opportunities for traditional, first-cultures to flourish.

These commitments to Country will guide the ongoing engagement with Aboriginal communities involved in the I2S Project and are reflected in this Aboriginal Community and Stakeholder Engagement Strategy.

2.1.4 Designing with Country Discussion Paper

The *Designing with Country Draft Discussion Paper* (Government Architect NSW, 2020b) outlines a series of questions and engagement processes that will help inform a set of Cultural Design principles and a framework to apply them to all built environment projects delivered by government.

The discussion paper acknowledges that through current planning processes under the EP&A Act, *“Aboriginal values are identified only in specific locations of archaeological and heritage value. As a result, current planning and design approaches have a narrowly defined consideration of Aboriginal understanding of landscape and environment during the planning process or design of the built environment.”*



As the Inland Rail I2S project moves into the detailed design phase, there is an opportunity to open up wider engagement conversations with Aboriginal community members and recognised cultural knowledge holders to consider and respond to opportunities to incorporate Aboriginal values into the final design of the proposal. This strategy outlines where and how these conversations will take place.

2.1.5 Aboriginal Cultural Heritage Consultation Requirements for Proponents

The *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW, 2010a) establishes the requirements for consultation under part 6 of the *National Parks and Wildlife Act 1974* with Aboriginal stakeholders as part of the heritage assessment process to determine potential impacts of proposed activities on Aboriginal objects and places.

As outlined in Section 2.3, the guidelines have been implemented throughout the engagement activities for Aboriginal cultural heritage to-date and would continue to provide the framework for future cultural heritage investigations and surveys.

2.1.6 Ask First: A Guide to Respecting Indigenous Heritage and Places

Ask First: A guide to respecting Indigenous heritage places and values (Australian Heritage Commission, 2002) provide guidance on allowing the relevant Indigenous people to determine the significance of places in accordance with their culture before moving to achieving agreements between parties on how places and heritage values should be managed. It is intended to complement the Australian Natural Heritage Charter and the Burra Charter (Australia ICOMOS, 2013).

The principles of the Ask First guide have been implemented throughout the engagement activities for Aboriginal cultural heritage to date and would continue to provide the framework for any future cultural heritage and archaeological investigations.

2.2 Inland Rail specific plans and policies

Several plans and policies have been developed by IRPL to establish the commitment and approach to Indigenous engagement over the life of the Rail project in respective communities. These include:

- Inland Rail Program Indigenous Participation Plan (ARTC, 2019)
- Inland Rail Communications and Engagement Strategy (4-0000-220-PCS-00-CS-0001)
- Inland Rail Sustainable Procurement Policy (0-9000-PCM-00-PO-0002)
- Inland Rail Australian Industry Participation Plan
- Inland Rail Programme Indigenous Procurement Policy (0-9000-PCM-00-PO-0001)
- Inland Rail Programme Local Industry Participation Plan (0-9000-PCM-00-PL-0008)

The following plans are considered most relevant to this strategy.

2.2.1 Inland Rail Community Communications Strategy I2S

This communication strategy has been prepared to cover all construction works including low impact works and 12 months following the completion of construction of the I2S section of the Inland Rail. The strategy was prepared in accordance with Conditions B1 and B2 of the Conditions of Approval.

As per Condition B1,

A Community Communication Strategy must be prepared to facilitate communication about construction and operation of the CSSI with;

- (a) *the community (including, adjoining affected landowners and businesses, Registered Aboriginal Parties (RAPs), relevant LALCs, traditional owners and other directly impacted by the CSSI); and*
- (b) *the relevant state agencies and councils.*

As per Condition B2, it seeks to:

- *identify people, organisations, relevant council(s) and state agencies to be consulted, during the design and work phases of the CSSI;*
- *identify details of the community and its demographics;*
- *set out procedures and mechanisms for the regular distribution of accessible information, including to CALD and vulnerable communities, about or relevant to the CSSI.*
- *identify opportunities for education within the community and make provision for the community to visit construction sites (taking into consideration workplace, health and safety requirements);*
- *detail the measures for advising the community in advance of upcoming construction including out-of hours work and blasting activities;*
- *identify the mechanisms for engaging with the community to determine periods of respite;*
- *provide for the formation of issue or location-based community forums that focus on key environmental management issues of concern to the relevant community(ies);*
- *set out procedures and mechanisms for consulting with relevant councils and state agencies;*
- *describe the method for broadcasting the 24-hour toll-free telephone complaints number and postal and email addresses for enquiries;*
- *set out procedures and mechanisms:*
 - o *through which the community can discuss or provide feedback to the Proponent;*
 - o *through which the Proponent will respond to enquiries or feedback from the community;*
 - o *to resolve any issues and mediate any disputes that may arise in relation to the environmental management and delivery of the CSSI, including disputes regarding rectification or compensation;*
 - o *address who will engage with the relevant stakeholders; and*
 - o *to resolve any issues and mediate any disputes that may arise in relation to property and infrastructure impacts, including but not limited to Individual Property Management Plans.*

The engagement approach of this strategy, has been incorporated into Section 3 of this report. Relevant positions and responsibilities have also been incorporated into Table 4.1 of this report. The communications tolls and engagement methods tabled in Section 7 of the Community Communication Strategy would run parallel to the strategy and methods presented in this report. The Community Complaints Management Process has also been included, where appropriate.

2.2.2 Inland Rail First Nations Participation Plan

The Inland Rail Indigenous Participation Plan sets out Inland Rail's commitment to Indigenous communities, industry and government across four key areas of Respect and Recognition, Cultural Heritage, Indigenous Employment and Indigenous Business. To achieve the Respect and Recognition goals, IRPL has committed to:

- proactively engage with First Nations communities and their leaders, including Elders, to develop partnerships based on mutual respect and understanding
- deliver an Acknowledgement of Country at our meetings and events and ensure a Welcome to Country is delivered at significant events where possible. (in the event that a representative is unavailable to deliver a Welcome to Country, an Inland Rail representative will deliver an Acknowledgement of Country)
- encourage cross-cultural exchanges and cultural learning opportunities for all Inland Rail employees and contractors



- Celebrate, support and participate in significant days and events that showcase and celebrate First Nations culture and history such as Sorry Day, Reconciliation Week and NAIDOC Week.
- where practical, work with Traditional Owners to find suitable names in traditional language and incorporate First Nations cultural design in key pieces of infrastructure
- encourage participation of First Nations community members in our Community Consultative Committees.

2.3 John Holland project specific plans

JHG has prepared a Social Impact Management Plan (SIMP), Heritage Management Plan and a Cultural Values Management Plan (CVMP) that will incorporate engagement activities with first nations people and the Project as well as set requirements associated with first nations engagement. These engagement activities will include:

- Reviewing and providing consultation on documentation for the Plans above as well as methodologies, strategies and reports.
- Providing local knowledge to the Project team in delivery of archaeological survey, excavation and salvage activities.
- Participating in workshops to identify cultural values that are important to community and how these can be implemented in design and construction of the Project.
- Assisting in the development of targets and confirming opportunities to reduce social impacts to local indigenous communities.

2.4 Aboriginal community consultation for the project

In New South Wales, Aboriginal cultural heritage assessments follow guidelines set by Heritage NSW, which emphasise consulting Aboriginal communities when investigating, assessing and reporting on Aboriginal cultural heritage in NSW. The project area falls within the traditional lands of the Wiradjuri people.

As outlined below, during preparation of the Aboriginal Cultural Heritage Assessment Report (ACHAR) for the project Aboriginal consultation was conducted in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW, 2010b). This included consultation with Registered Aboriginal Parties (RAPs) and Local Aboriginal Land Councils (Wagga Wagga and Young) and their participation in fieldwork, including survey and test excavations.

For the construction phase of the project consultation with RAPs will comprise emails, phone calls, letter and in person meetings. Consultation with other traditional owners will be undertaken as part of the Aboriginal Cultural Values Plan.

2.4.1 Aboriginal community consultation for the Aboriginal Cultural Heritage Assessment Report (ACHAR)

The consultation process for the Project's ACHAR involved identification, registration, engagement and consultation with Aboriginal peoples who may hold cultural knowledge relevant to determining the significance of an Aboriginal object and/or place. The following stages of consultation were applied:

1. Notification of the Project: Informing appropriate agencies and Aboriginal people about the nature and scope of the proposal.
2. Presentation of Information: Understanding what might be present in the landscape and its cultural significance.
3. Gathering Information: Determining the potential impacts and the proposed strategies to deal with them.

4. Review of assessment methodology.
5. Participation in survey and test excavations.
6. Review of the results of the investigation.
7. Review of the draft ACHAR.

During preparation of the ACHAR there was an opportunity for RAPs and LALCs to provide comment on the approach of the works, mitigation measures and recommendations relating to their heritage. The approach to community consultation followed the legislated timelines outlined in the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*

2.4.2 Summary of known cultural sites and values

Consultation with RAPs during archaeological fieldwork for the ACHAR identified the following sites of cultural heritage value within the I2S Project area:

- Campsites, indicated by stone artefact scatters and subsurface deposits;
- Scarred trees;
- A ring tree;
- Isolated artefacts and
- Areas of archaeological potential (PAD).

The cultural values of these sites and the broader study area were discussed in the ACHAR, as follows:

“The study area crosses the plains to the west of the Bethungra Ranges which are a significant area for the Wiradjuri people. Caves within these ranges are associated with a cultural story relating to the creation of the Murrumbidgee River and the transformation of Wiradjuri culture from patriarchal to matriarchal. The river systems across these plains provided resources in support of the cultural activity in nearby areas such as the ranges.

The archaeological sites themselves are of significance to the local Aboriginal community as a tangible demonstration and connection to the understanding that this landscape was used by Aboriginal people in the past. This evidence concretises the relationship between the known cultural sites in the surrounding areas and the day-to-day way of life of the people who valued those places in the past.

The archaeological evidence within the study area has cultural value to the local Aboriginal community.

Scarred trees and ring trees identified in close proximity to the study area were also discussed as being of significance as tangible indicators of traditional marking of the landscape, the procurement of resources and other ceremonial activities. There are two scarred trees within the study area, noting that while none are affected by the current proposal, the presence of these trees in the general vicinity conveys the significance of the landscape to the local Aboriginal community”. (GML, 2022:153)

2.4.3 Aboriginal community consultation for the Construction Stage of the Project

On commencement of the current project, a letter was sent to RAPs identified during the ACHAR. This letter introduced the new project team and the ongoing archaeological assessment that will be required for the Project.

Given the time that has lapsed since preparation of the EIS and the number of additional Aboriginal stakeholders included in the Heritage NSW Stakeholder List, it was decided to re-start the consultation in January 2025 to ensure an inclusive process during the project's construction phase. The steps followed as part of the EIS are being replicated and an updated RAP list created for subsequent archaeological investigations and the Aboriginal Cultural Values Assessment.



For the construction stage of the project, Aboriginal community consultation was re-initiated in accordance with the DECCW *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*. Stage 1.1 letters to statutory bodies were sent on 20 January 2025, requesting contact details for Aboriginal people who may have an interest in the study area.

These statutory bodies included the:

- Heritage NSW (formerly OEH)
- Young Local Aboriginal Land Council
- Wagga Wagga Local Aboriginal Land Council
- Office of The Registrar, Aboriginal Lands Right Act 1983
- National Native Title Tribunal
- Native Titles Service Corporation
- Junee Council
- Cootamundra Gundagai Council
- City of Wagga Wagga Council; and
- Greater Sydney Catchment Management Authority

An advertisement was placed in *The Riverina Leader* on 3 February 2025 with the closing date for registration on 17 February 2025. Following the receipt of responses from Stage 1.1, a number of additional Aboriginal stakeholders were identified. These stakeholders are listed in Section 4 of this report.

3 Engagement objectives and principles

The objective of this strategy is to outline how Aboriginal stakeholders, and the Aboriginal community will be engaged during the pre-construction and construction phases of the Inland Rail I2S Project.

The strategy is based on a collaborative engagement process that aims to:

- Maintain strong relationships developed by Inland Rail and Aboriginal stakeholder and communities in the vicinity of the project area. This process will be facilitated by the physical introduction of JHG's Environment Team to key Aboriginal stakeholders by Inland Rail during the initial early works stage of the construction program.
- Share information about the I2S Project between JHG and Aboriginal stakeholders in a timely manner, particularly project activities and opportunities that may affect stakeholders and communities. This is based on the broader *Community Communications Strategy* prepared for I2S by Inland Rail.
- Engage with Aboriginal stakeholders and communities to understand and document local Aboriginal cultural and community values through the preparation of an Aboriginal Cultural Values Plan for the Project. This plan will be prepared by Dr. Susan McIntyre-Tamwoy (Associate Director, Navin Officer) on behalf of JHG.
- Engage and involve Registered Aboriginal Parties (RAPs) in ongoing archaeological investigations within the I2S Project Area. This will include providing methodologies for identifying, investigation, managing and protecting cultural heritage sites and salvaged material. The archaeological investigations will be managed by Mountains to Sea Heritage (MTS) and Apex Archaeology, on behalf of JHG.
- Implement opportunities identified during preparation of the Aboriginal Cultural Values Plan. The plan aims to identify how interpretive themes and cultural values will be implemented and provide a timeframe for their provision during construction.
- Identify opportunities for the procurement of local Indigenous businesses during the design, construction, commissioning and completion of the I2S Project to achieve targets proposed in the *I2S Sub-Plan: Local and Indigenous Industry Participation* and *I2S Sub-Plan: Workforce Management Plan*. Aboriginal representatives will provide cultural heritage awareness training to ensure on-site staff are engaged with cultural heritage.

This engagement strategy is based on the following key principles, which mirror those included in *Inland Rail's Stakeholder Engagement and Preliminary Framework* (2022: 9):

- **Building relationships** – JHG is committing to developing and maintaining relationships with local Aboriginal stakeholders and communities throughout the detailed design and construction phases of the I2S Project. Building trust is essential to develop these relationships. Trust is built through ongoing and transparent conversations throughout the project, and a commitment to listen to what is shared and implement actions appropriately with thought and acknowledgement of cultural and intellectual property rights of first nations peoples and groups who are involved in these conversations.
- **Respectful engagement** – JHG understands that engaging in culturally appropriate ways is fundamental to building trust in relationships. JHG will share information with Aboriginal stakeholders and communities to keep them up to date with project activities and construction progress over time. Through consultation and workshops run as part of the Aboriginal Cultural Values Plan, JHG will listen to stakeholders and understand how best to engage with the community about how the community would like to be engaged throughout the project. JHG will seek consent from Aboriginal Stakeholders on how information provided by them will be reported on, interpreted and shared.
- **Meaningful engagement** – JHG will engage with communities about various opportunities across the I2S proposal and inform communities how they can become involved. During engagement activities, JHG will clearly articulate negotiable and non-negotiable aspects of the projects and how information shared by communities will be used. JHG will listen to the community and implement actions appropriate to the scope of the I2S Project.

4 Stakeholders

There are several Aboriginal stakeholders and community groups in the I2S Project area who would be engaged during the design and construction phases of the I2S Project. Key stakeholder groups are identified in Table 4 below. This table follows the definitions and descriptions provided in the *N2N Inland Rail Aboriginal Community and Stakeholder Engagement Preliminary Framework* (2022). It is recognised that these descriptions may require revision in future, after further consultation with respective Aboriginal communities and stakeholders, and this strategy would be updated to reflect mutually agreed language.

Table 4: Aboriginal stakeholder groups in the I2S Project Area

Stakeholder group	Description
Traditional Owners	Traditional Owners are those people who, through membership in a descent group or clan, have responsibility for caring for particular Country. Traditional Owners are authorised to speak for Country and its heritage. Authorisation to speak for Country and heritage may be as a senior Traditional Owner, an Elder, or in more recent times, as a registered Native Title claimant (Australian Heritage Commission, 2002).
Knowledge holders	Knowledge holders are defined as Aboriginal people who are engaged in maintaining and, in some cases, reclaiming Indigenous knowledge traditions. Indigenous knowledges, sometimes called traditional or local knowledges, refers to the understandings and practices developed by Indigenous peoples through thousands of years of experience. Indigenous knowledge systems are characteristically holistic, relational, and rooted in a strong and continuing connection with the land, sky and waters. Knowledge is often passed down orally and can be collectively owned. It can include or be embodied in language, song, story, ritual, lore, and customary practices. (University of Melbourne, n.d.). <i>(This definition is subject to revision based on consultation with Traditional Owners).</i>
Local Aboriginal Land Councils (LALC)	LALCs are corporate bodies constituted under the <i>Aboriginal Land Rights Act 1983</i> (ALR Act). Under the ALR Act, LALCs have defined boundaries within which they operate (Department of Environment, Climate Change and Water, 2010). The objectives of each LALC are to improve, protect and foster the best interests of all Aboriginal persons within the Council's area and other persons who are members of the Council. LALCs oversee operations of land acquisition, land use and management, Aboriginal culture and heritage, financial stewardship and management of property. The LALCs in the I2S Project area include: <ul style="list-style-type: none"> - Wagga Wagga LALC - Young LALC
Native Title Claimants	There are no current registered native title claims in the I2S Project area.
Registered Aboriginal Party (RAP)	Under the NSW cultural heritage legislation an individual or organisation can register an interest in being involved in the heritage assessment of a development site. This provides an opportunity to be consulted the development application process. The following RAPs have expressed their interest in the I2S Project: <ul style="list-style-type: none"> - Barking Owl Aboriginal Corp - Peter Beath - Brungle / Tumut LALC - Gulgunya NHAC - Bidya Marra Consultancy



Stakeholder group	Description
	<ul style="list-style-type: none">- Peter Ingram- PD Ngunawal Consultancy- Wagga Wagga LALC- Young LALC- Bundyi Cultural Tours- Miyangan Culture & Heritage- Sonione Rogers- Wingarra Wilay- Yurwang Gundana CHS- <name withheld on request>- <name withheld on request>
Broader Aboriginal community	The broader Aboriginal community refers to Aboriginal people as a collective who live in or have interests in an area. The broader community may include Aboriginal people who have cultural obligations and connections to that Country (such as Traditional Owners) as well as Aboriginal people who may have moved to the area from other Countries, but still hold strong connections to community, culture and place.
Aboriginal service providers/ businesses	Aboriginal and non-Aboriginal owned and operated businesses and services which offer targeted services and facilitate opportunities for Aboriginal communities. These service providers and businesses are often well connected to Aboriginal stakeholders and communities. Relevant Aboriginal owned and operated businesses are listed in Table 4 of this report.

5 Engagement opportunities

There are several opportunities where engagement with Aboriginal stakeholders can take place during the project. These include:

- Broader community engagement as outlined in the *I2S Community Communication Strategy*
- Consultation on the Construction Environmental Management Plan (CEMP) Heritage Sub-plan
- Targeted engagement as part of I2S Aboriginal Cultural Values Plan.
- Targeted engagement as part of the I2S Archaeological Program.
- Targeted support and procurement of local and Indigenous businesses through the implementation of the *I2S Sub-Plan: Workforce Management Plan* and the *I2S Sub-Plan: Local and Indigenous Industry Participation*
- Consultation in the development of the I2S Social Impact Management Plan (SIMP).

5.1 Broader community engagement

As outlined in the *I2S Community Communication Strategy* the community will be engaged and informed about the Project and construction activities using various methods. These include:

- Community notifications. These will be regularly distributed to provide information to the community about nearby upcoming works. These notifications will be sent via mail, appear on the Inland Rail website and, depending on the impact, advertised in the local newspapers.
- Door knocking. This will be used to inform directly impacted residences and businesses of construction activities, where no other contact method is available.
- Fact Sheets addressing Frequently Asked Questions. These will be prepared for the community to explain key part of the projects, specific issues or concerns raised. These Fact sheets will be available on the Inland Rail website
- Advertising. This will include press and radio advertisements to raise aware and understanding about the project and provide information to stakeholders, so they can communicate their views, issues and concerns.
- Media releases. These will aim to inform and raise awareness about the project amount relevant government agency stakeholders, local businesses and broader industry.
- Photographs, videography, timelapse and visualisations. These will be taken during construction to demonstrate progress. These will be uploaded to the Project website and Social PinPoint throughout the duration of construction.
- Project signage and hoarding. These will provide contact details and information about the project.
- A 24-hour community hotline number has been established for the community to ask questions or provide feedback or make complaints about the project.
- An email address will continue to be maintained for the project, to provide a means for the community to contact the stakeholder and project team and ask questions or make complaints about the project.
- The project website will provide access to digital material and provide reference point to obtain further information.
- The I2S Social Pinpoint provides community and stakeholders with an avenue to engage with the project in an online forum and interactive map.
- Website and social media. A website has been developed for the project to facilitate two-way communicate with various social media platforms established for the Project. These platforms support recruitment and supply engagement efforts and share updates and achievements about the project and broader Inland Rail program.

- Community Information Sessions. These provide an opportunity for community members to find out more about the project, environmental issues and ask questions.
- Meetings. There will be some direct interaction with community members and stakeholders to obtain feedback and raise awareness about the project.
- Stakeholder Presentations and Briefings. These technical and issue-specific presentations target specific stakeholder groups and agencies.
- Attendance at markets and events. This will allow information about the project to be distributed and raise awareness about the project.
- Community and business capability workshops. These sessions will help regional business understand how to engage with buyers, and work with regional supply chains.
- Feedback surveys. A survey will be conducted six months into construction.
- Educational opportunities. An education campaign will be developed to increase community awareness.
- Site visits. This will provide the community with opportunities to visit the site, whilst ensuring workplace, health and safety requirements are followed.
- Inland Rail has First Nations Advisors who provide engagement with an understanding of historical, cultural and social complexity of local and regional First Nations contexts.

5.2 Consultation on the Construction Environmental Heritage Management Sub-Plan

The I2S Conditions of Approval specify documents to be prepared in consultation with identified parties. A Construction Environmental Heritage Management Sub-Plan is required under CoA C23 and must be prepared in consultation with Heritage NSW, RAPs and relevant councils. As outlined in the CoA, the plan must include:

- identification of the Aboriginal objects and Aboriginal places that must be avoided and the protective measures to be put in place;*
- procedures for additional surveys as required by **Condition E135**;*
- procedures for salvaging and safe keeping of the Aboriginal objects identified in the documents listed in **Condition A1**, and their long-term management;*
- measures to avoid or minimise disturbance to Aboriginal heritage where, (as considered by legislation, guidelines and community) areas, objects or places are found to be present. Where impacts cannot be avoided, records of stakeholder involvement and engagement; and details on the methodology for archaeological excavation and/or salvage work;*
- a process for inspecting trees for evidence of cultural scarring in areas that were not subject to the archaeological survey, and measures to avoid impact. If impact is unavoidable, and upon consultation with the Registered Aboriginal Parties, work shall be undertaken under the guidance of an appropriately qualified heritage specialist; and*
- an Unexpected Heritage Finds and Human Remains Procedure in accordance with **Condition E143**, with the requirement that Heritage NSW are contacted and consulted upon the discovery of human remains, prepared by a suitably qualified and experienced heritage specialist.*

JHG is in the process of preparing this draft sub-plan, with the assistance of Fiona Leslie (Principal Heritage Consultant, MTS Heritage Pty Ltd), who is the appointed Heritage Project Manager appointed by JHG. Once finalised and approved by Inland Rail, a copy of the plan will be sent to RAPs for review and comment.

5.3 Engagement as part of the Aboriginal Cultural Values Plan

Dr. Susan McIntyre-Tamwoy (Associate Director, Navin Officer) has been engaged to prepare an Aboriginal Cultural Values Plan to satisfy CoA 133 of the CSSI. This condition is reproduced below:

E133 *An **Aboriginal Cultural Values Plan** must be prepared to inform how Aboriginal Cultural Values will be integrated into the broader design of the SSI including design elements (form and fabric), landscaping (the collection, propagation and replanting of traditional plant resources), language; and cultural design principles. The Plan must identify how interpretive themes and cultural values will be implemented and provide a timeframe for their provision during construction.*

The Plan must recognise the spiritual, intangible, linguistic and cultural values of the sites to Aboriginal people and address the full story of the place (s) (i.e. landscape through the eyes of Aboriginal people); Aboriginal design and story elements, patterns and motifs or other appropriate visual interpretations.

*The Plan will be developed in conjunction with the **Aboriginal Community and Stakeholder Engagement Strategy**. The Strategy will detail the consultation process with Aboriginal stakeholders and identify the Aboriginal Cultural Values to be incorporated into the design of the CSSI.*

*The **Aboriginal Cultural Values Plan** shall be submitted for the approval of the Planning Secretary one (1) month prior to commencing construction. The **Aboriginal Cultural Values Plan** must be implemented.*

The Plan will aim to identify spiritual, intangible, linguistic and cultural values of sites to Aboriginal people and address the story of the place and identify Aboriginal design and story elements, patterns and motifs and other appropriate visual interpretation. It will also identify how interpretive themes, and cultural values will be integrated into the broader design of the Inland Rail, including design elements, landscaping, language and cultural design principles.

The approach by Navin Officer for the Aboriginal Cultural Heritage Values Plan (the Plan) is flexible and designed to deliver targeted and meaningful Indigenous consultation and superior cultural values mapping. It will use a combination of techniques including desktop archival research, and a balance of face to face, and virtual (Microsoft Teams) or phone consultation.

In addition to RAPs identified for the Project, engagement with additional Aboriginal stakeholders is crucial for the development of the Aboriginal Cultural Values Plan. Traditional Owners, Elders and Knowledge Holders will be identified by Navin Officer through additional consultation and liaison with Inland Rail's First Nations Engagement Advisor, as the First Nations relationship owner for Inland Rail. This will be followed by face-to-face consultation with Aboriginal Knowledge Holders and other stakeholders on country in their home environment. This will assist in building trust and allow Aboriginal stakeholders to feel comfortable and secure in a familiar environment. Two targeted cultural mapping workshops will be held on country, following by one-on-one oral history interviews. Aboriginal stakeholders will be paid to participate in the workshops and interviews.

Culturally sensitive information will be managed through the use of Information and Release forms to ensure that Aboriginal stakeholders provide consent to the use of the material. This also ensures that appropriate access protocols are in place from the start of the project. Where oral information is collected, Navin Officer would encourage knowledge holders to lodge a copy with the Australian Institute of Aboriginal Studies (AIATSIS) as an organisation that specialises in managing cultural information with appropriate access protocols.

Following the workshops, interviews and further research, the draft Aboriginal Cultural Values Plan will be distributed to all of the Aboriginal stakeholders that participated, for review. Once comments from Aboriginal stakeholders are considered, a final copy of the Plan will be sent to all of the participants

and RAPs. A copy of the plan is also required to be sent for approval of the Planning Secretary one month prior to commencing construction.

5.4 Engagement and involvement in the Archaeology Program

Further archaeological survey, test excavation and salvage excavation are required within the I2S Project area. This is because sections of the new rail corridor (Zones 5, 6, 9 and 10) were not accessible during preparation of the ACHAR which informed the Environmental Impact Statement (EIS). Apex Archaeology Pty Ltd (Apex) will conduct the archaeology program of works to satisfy the following CoAs:

- E135 Prior to the commencement of any ground disturbance work within areas identified as requiring archaeological investigation or salvage identified in documents listed in Condition A1, the Proponent must prepare and implement an Additional Aboriginal Archaeological Survey and an Aboriginal Archaeological Test Excavation Methodology. The methodology must include procedures for additional archaeological survey of Zones 5, 6, 9 and 10, and management protocols including consultation with the Registered Aboriginal Parties, for any Aboriginal objects and sites identified during the survey.*
- E136 Following analysis of the test excavation results, the Proponent must prepare and implement an Aboriginal Archaeological Salvage Excavation Methodology.*
- E137 Following additional survey, test and salvage excavation, if sites are identified that exceed the expected level of significance identified in the Aboriginal Cultural Heritage Assessment Report, further consultation with Heritage NSW and the RAPs must be undertaken and consideration given, where feasible, for avoidance by the project.*
- E138 The Additional Aboriginal Archaeological Survey Methodology, Aboriginal Archaeological Test Excavation Methodology and Aboriginal Archaeological Salvage Excavation Methodology must be prepared by a suitably qualified expert in consultation with Heritage NSW and RAPs, and provided to the Planning Secretary for information at least one month prior to test or salvage excavation.*
- E139 At the completion of Aboriginal cultural heritage survey and test and salvage excavations, an Aboriginal Cultural Heritage Excavation Report(s) must be prepared by a suitably qualified expert. The Aboriginal Cultural Heritage Excavation Report(s), must:*
 - (a) be prepared in accordance with the Guide to Investigation, assessing and reporting on Aboriginal cultural heritage in NSW, OEH 2011 and the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, DECCW 2010; and*
 - (b) document the results of the archaeological survey and test excavations and any subsequent salvage excavations (with artefact analysis and identification of a final repository for finds).*

The RAPs must be given a minimum of 28 days to consider the report and provide comments before the report is finalised. The final report must be provided to the Planning Secretary, Heritage NSW, the relevant Councils, relevant LALCs and the RAPs within 24 months of the completion of the Aboriginal archaeological excavations (both test and salvage).

Apex Archaeology will distribute the draft *Aboriginal Archaeological Survey and Test Excavation Methodology* to RAPs, allowing a minimum of 28 days for comment. Similarly, the draft *Aboriginal Salvage Excavation Methodology* will be sent to RAPs, allowing a minimum of 28 days for comment. Both methodologies must be sent to the Planning Secretary 1 month prior to commencing each stage of fieldwork.



RAPs will be provided with the opportunity to participate in archaeological survey test excavation, artefact collection and repatriation in accordance with best practice. RAPs will be paid for participation in fieldwork. Within 12 months of completing archaeological fieldwork, Apex Archaeology will document the results of the investigations in an Aboriginal Cultural Heritage Excavation Report. A draft copy of this report will be sent to RAPs, allowing a minimum of 28 days for comment. A copy of the final report will also be sent to RAPs via email.

5.5 Engagement and support of Indigenous businesses

The Social Impact Management Plan (SIMP) will be developed in consultation with Local Aboriginal Land Councils (LALCs) and other groups to reduce social impacts to community as well as seek to provide positive outcomes. The SIMP has identified economic benefits that will be developed further with these groups around the support of indigenous suppliers and businesses.

Opportunities for engagement and support to these businesses will be communicated by JHG in the following ways:

- Direct contact with businesses through existing relationships
- Industry briefings
- I2S ICN Gateway
- Supply Nation
- NSW Indigenous Chamber of Commerce
- Local Government networks
- Chambers of Commerce
- Local/Regional newspapers and industry publications

The SIMP will develop further actions to undertake engagement with these stakeholders and Indigenous businesses for potential supply and employment opportunities during the design and construction phases of the project.

6 Strategy and implementation

The following strategy in Table 6 illustrates how Aboriginal stakeholders will be engaged during different stages of the project and who will be responsible for the various actions.

Table 5: Aboriginal engagement strategy

Objective	Actions	Timing	Responsibilities
Maintain strong relationships developed by Inland Rail	Introduce JHG's Environment Team to key Aboriginal stakeholders through informal meetings.	Design phase / early works	Inland Rail First Nations Engagement Advisor + JHG
Share information about the I2S Project	<ul style="list-style-type: none"> - Distribute the draft CEMP Heritage Sub-Plan to RAPs for review - Distribute a draft version of this report to RAPs for review - Implement the <i>I2S Community Consultation Strategy</i> 	Design phase / early works + Duration of the project	JHG + MTS Heritage
Engage with Aboriginal stakeholders and communities through the Aboriginal Cultural Values Program	<ul style="list-style-type: none"> - Conduct workshops and Face-to-Face Interviews with key Aboriginal Stakeholders - Distribute the draft Aboriginal Cultural Values Plan to Aboriginal Stakeholders for review - Distribute the final Aboriginal Cultural Values Plan to Aboriginal Stakeholders 	Design phase / early works	JHG, Navin Officer, MTS Heritage + Inland Rail First Nations Engagement Advisor
Engage and involve RAPs in the Archaeology Program	<ul style="list-style-type: none"> - Distribute a draft methodology for Archaeological Survey and Test Excavation to RAPs for comment - Distribute a draft methodology for the Archaeological salvage excavation program, incorporating the results of testing - Involve RAPs in the archaeological test and salvage excavation programs - Distribute the draft Aboriginal Excavation Report to RAPs for review. on completion of the investigation - Distribute the final Aboriginal Excavation Report to RAPs 	Design phase / early works + Construction phase	JHG, Apex Archaeology, MTS Heritage + Inland Rail Senior Cultural Heritage Advisor
Implement opportunities identified through the Aboriginal Cultural Values Plan	<ul style="list-style-type: none"> - Provide a copy of the Aboriginal Cultural Values Plan to the JHG Design and Communication Teams 	Construction phase	JHG



Objective	Actions	Timing	Responsibilities
	<ul style="list-style-type: none">- Implement recommendations of the Aboriginal Cultural Values Plan into the broader design, including design elements		
Identify opportunities for the supply and procurement of local Indigenous businesses	<ul style="list-style-type: none">- Provide a copy of the Aboriginal Cultural Values Plan to the JHG Design and Communications Team- Use Indigenous supplier and subcontractors lists to source services required to implement recommendations of the Aboriginal Cultural Values Plan	Construction phase	JHG



7 References

ARTC (2022) *Aboriginal Community and Stakeholder Engagement Preliminary Framework: Narromine to Narrabri Project*. Unpublished report.

GML Heritage (2022) *Aboriginal Cultural Heritage Assessment Report*. Unpublished report to WSP Australia Pty Ltd.

Inland Rail (2024) *Community Communications Strategy Illabo to Stockinbingal (I2S)*. Unpublished report.

John Holland Group Pty Ltd (2025) *Inland Rail Illabo to Stockinbingal Project: Sub-Plan: Local and Indigenous Industry Participation*. Unpublished draft report.

John Holland Group Pty Ltd (2025) *Inland Rail Illabo to Stockinbingal Project: Sub-Plan: Workforce Management Plan*. Unpublished draft report.

WSP Australia Pty Ltd (2022) *Illabo to Stockinbingal: Environmental Impact Assessment*. Unpublished report to Australian Rail Track Corporation.