



THE UNIVERSITY OF
**WESTERN
AUSTRALIA**



Centre for Rock Art Research + Management
Archaeology M257
CRAWLEY WA 6009



Our ref: jmc1117
Your ref: 62-03516

28 November 2017

The Honourable Stephen Dawson
Minister for Environment; Disability Services
Level 12, Dumas House
2 Havelock Street,
West Perth WA 6005

Dear Minister Dawson,

Re: Draft Burrup Rock Art Strategy

Thank you for your letter of 8 September 2017 regarding the release of the draft Burrup Rock Art Strategy ('the draft Strategy'), and your proposal to establish a Reference Group to inform decision-making in relation to this Strategy. We welcome this overdue WA government initiative aimed at ensuring better research, monitoring and protection of the internationally-significant rock art of the Dampier Archipelago. There is a demonstrated need for a long-term framework to understand the nature of possible impacts from pollution on this region's significant rock engravings and to ensure an appropriate management regime.

We note that the findings of the Senate Inquiry (referenced as Appendix A of the draft Strategy) have been delayed again. Thus there is no official response to the various concerns raised about pollution monitoring and other heritage management responsibilities (at the State and Commonwealth levels). These findings may be critical in providing direction for future monitoring and management decisions. As the deadline for public comment on this draft Strategy was not similarly revised, our comments at this point should be considered as preliminary and we will continue to comment on the draft Strategy as required.

In the meantime it is possible to respond to the draft Strategy's proposed scope (Section 3), and to make suggestions to how this could better proceed. We agree that the following items are vital to ensuring a viable long-term Strategy to protect Burrup rock art:

- Further monitoring and robust analysis needs to be implemented with demonstrable scientific rigour to determine whether change is occurring to the rock art located on the Burrup Peninsula;
- New studies are required to determine the current and emerging pollution loads on the Burrup Peninsula, the sources of that pollution, and whether that pollution load may result in deterioration of the rock art; and
- Appropriate governance arrangements are required to ensure that monitoring and reporting is undertaken in such a way as to provide confidence to the community, Traditional Owners, industry and scientists about the integrity, robustness, and effectiveness of the monitoring data and results;

- Government requires accurate and appropriate recommendations regarding the protection of the rock art, consistent with its legislative responsibility.

A programme of pollution monitoring and analysis should be accompanied by an assessment of the local geology to determine the susceptibility of Murujuga rock surfaces to the various industrial emissions. This requires an appropriate research methodology with agreed principles, protocols and documentation, and must be resourced to ensure appropriate data collection processes, techniques, personnel and equipment. This work should be undertaken by an independent, suitably qualified person (with appropriate team support) to ensure the credibility of all results. All data must be made publically available so that these scientific findings can be independently verified.

It is premature to commission a new monitoring programme until an appropriate methodology has been established. It is also questionable as to whether DWER has the capacity (personnel or resourcing) to develop this new programme or to audit and/or interpret its results.

The proposed Burrup Rock Art Stakeholder Reference Group (defined in Appendix B) is identified as having “an informal liaison role ...to facilitate engagement” (p. 17) through the life of the Strategy. This Stakeholder Reference Group could provide the necessary oversight to assist DWER in interpreting, monitoring and disseminating the results of the monitoring programme, and we suggest that this committee would be better envisaged as having that oversight. As such, it would not require membership by multiple government departments which have different management and regulatory roles in the Burrup – although appraising these Departments of management implications is required. We suggest that involving the Commonwealth, given their regulatory role through the EPBC Act, in the larger National Heritage Listed area would also be desirable.

Appropriate membership of this Committee could comprise one representative each from the following:

- Murujuga Aboriginal Corporation
- the scientific community (specifically an analytical chemist)
- relevant Industry on the Burrup Peninsula (preferentially appropriately qualified scientists working for companies with airborne emissions, e.g. RTIO, Woodside, Yara)
- the Western Australian Museum (a conservation specialist)
- the UWA Centre for Rock Art Research and Management (a rock art specialist)
- The Department of Biodiversity, Conservation and Attractions (Karratha office)
- The Department of Planning, Lands and Heritage (Aboriginal heritage specialist)
- The Department of Water and Environmental Regulation (Chair)
- The (Cwlth) Department of Environment (regulations/heritage)

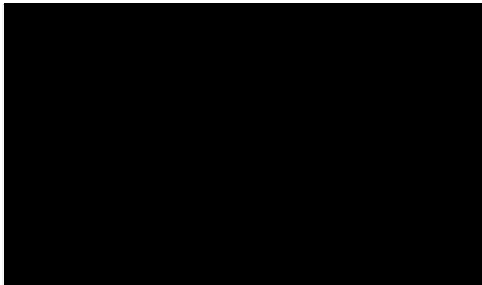
As such it may be better to re-name this committee The Burrup Rock Art Science and Management Committee.

We hope to have further input into the development of this Burrup Rock Art Strategy, and would like to discuss with you the likely benefits of a research and conservation project which CRAR+M (UWA) has been developing over the last 12 months, which we hope will be funded as an Australian Research Council Linkage Project. We think that this could provide the necessary research framework to develop an appropriate long-term testing and monitoring programme. We believe there is a need to involve both government (as regulators) and industry (as users) in this multiple-uses landscape, to balance both national economic interests as well as national heritage values. As you know, we have initiated crowd-funding with the Friends of Australian Rock Art, to raise funds for this project and this has revealed huge public support. An appropriately funded project would

ensure the necessary scope, processes and results to achieve best practice; overcome any perception of undue influence and ensure transparency; and result in appropriate recommendations for a long-term management and mitigation strategy for this irreplaceable Western Australian heritage landscape.

We look forward to working with the WA State Government to ensure the protection and appropriate management of the globally significant and National Heritage listed Aboriginal rock art of the Burrup Peninsula.

Sincerely



Professor Jo McDonald, PhD, MAACA
Director, CRAR+M

Rio Tinto Chair of Rock Art Studies