Letter - Response on the draft Aboriginal Cultural Review

CHA Review – Department of Aboriginal and Torres Strait Islander Partnerships
PO Box 15397
City East, QLD, 4002

Dear Sir or Madam

The Kabi Kabi Peoples Aboriginal Corporation welcomes the opportunity to provide feedback on the proposed Aboriginal Cultural Heritage Review for QLD, since the last significant review of the Act 10 years ago. Kabi Kabi Peoples Aboriginal Corporation supports the objects of the Review to recognise Aboriginal people's ownership of, and authority over, Aboriginal cultural heritage and to create a respectful and workable system for cultural heritage protection. We support the QLD governments complete review and revision of the system of defining, considering and recording Aboriginal Cultural Heritage (CHA) to simplify and modernise an often very confusing administrative process. We look forward to the opportunity to engage with the Queensland Government as the past decade has seen social, technological and economic changes, where we endeavour to ensure the State's legislation has an add value from the Kabi Kabi Traditional Custodian group.
EXECUTIVE SUMMARY

The purpose of this report is to present a response to the QLD Government to Review the Aboriginal Cultural Heritage Act. The proposed Review highlights themes to be considered from ownership, definition of Cultural Heritage, recording of sites, obligations of land users, and compliance with the Act, which will respect Aboriginal Cultural Heritage, reduce red tape and balance the different needs of interest groups across the community. The proposed Review of the Aboriginal Cultural Heritage Act are currently open to public consultation for comment until 26 July 2019. Kabi Kabi Directors were briefed at the meeting on the proposed Review on (day date month year). The response has been prepared outlining a number of concerns with the current legislation, particularly with regard to the potential impact of the changes on the timely delivery of infrastructure and development, and the subsequent lack of detail of the Cultural Heritage Act within the Planning Act.

RECOMMENDATION THAT Kabi Kabi Peoples Aboriginal Corporation:

1. Endorse the response in this report.
2. Forward the letter with the response to the Department of Aboriginal and Torres Strait Islander Partnerships for consideration in finalisation of the Aboriginal Cultural Heritage Review.

BACKGROUND

Statutory Protection – Legislation In Queensland

The Aboriginal Cultural Heritage Act 2003 and the Torres Strait Islander Cultural Heritage Act 2003 commenced on 16 April 2004. It received bipartisan support in Parliament and reflects four years of consultation between the State and the broad range of groups affected.

The legislation acknowledges the right of Aboriginal people and Torres Strait Islanders to be involved in the recognition, protection and conservation of their cultural heritage. For completeness it is noted that the Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth) also applies in Queensland.

Blanket Protection of Aboriginal and Torres Strait Islander Cultural Heritage

The blanket protection afforded under this new State legislation has a broader application than what applied under the repealed Cultural Record (Landscapes Queensland and Queensland Estate) Act 1987, as the definition of Aboriginal and Torres Strait Islander cultural heritage is more comprehensive.

The following fundamental principles underlie this Act’s main purposes –

(a) the recognition, protection and conservation of Aboriginal cultural heritage should be based on respect for Aboriginal knowledge, culture and traditional practices;

(b) Aboriginal people should be recognised as the primary guardians, keepers and knowledge holders of Aboriginal cultural heritage;
REPORT OF ORDINARY MEETING FROM KABI KABI PEOPLES ABORIGINAL CORPORATION HELD ON THURSDAY 01 AUGUST 2019

(c) it is important to respect, preserve and maintain knowledge, innovations and practices of Aboriginal communities and to promote understanding of Aboriginal cultural heritage;

(d) activities involved in recognition, protection and conservation of Aboriginal cultural heritage are important because they allow Aboriginal people to reaffirm their obligations to ‘law and country’;

(e) there is a need to establish timely and efficient processes for the management of activities that may harm Aboriginal cultural heritage.

The Nuga Nuga Decision

The Department of Aboriginal and Torres Strait Islander Partnerships (DATSIP) has previously released two fact sheets about the implications of the Supreme Court decision in Nuga Nuga Aboriginal Corporation v Minister for Aboriginal and Torres Strait Islander Partnerships [2017] QSC 321 (Nuga Nuga decision). This decision meant that the ‘last claim standing’ provision did not apply in the way decision-makers under the Aboriginal Cultural Heritage Act 2003 and the Torres Strait Islander Cultural Heritage Act 2003 (Cultural Heritage Acts) understood it to apply. The result of the case affected some decisions from the Department of Aboriginal and Torres Strait Islander Partnership that were rendered invalid as a result of the Nuga Nuga decision.

As a consequence, the Department of Aboriginal and Torres Strait Islander Partnership has responded to the uncertainty arising from the Nuga Nuga decision by amending the Cultural Heritage Acts and the amendments commenced on 9 November 2018. In addition, the Department of Aboriginal and Torres Strait Islander Partnership are conducting a review of the Cultural Heritage Acts in 2019. The review will provide a valuable opportunity to examine whether the legislation is still operating as intended.
Impacts of the CHA legislation on Kabi Kabi current roles with regard to Cultural Heritage are:

1. Strategic Council Zoning and Re-Zoning Planning Developments – Lacks a collaborative engagement process with Kabi Kabi in developing Aboriginal Heritage Studies to identify cultural practices, beliefs, items and places in the Region, limiting the identification of important items or places of Aboriginal heritage significance in planning documents.

2. Development Assessment – It would be important for Councils roles in assessing development applications, where a proposed development will or may impact on identified CHA values, outline various referral, notification and assessment requirements through trigger processes.

3. Councils should endorse Cultural Surveys where they plan to construct and maintain infrastructure on behalf of the community in places of significant Songlines, where works are not exempt and where Council has a required duty of care to work with the Kabi Kabi.

(The proposed model may have policy implications for Councils, in particular with regard to strategic planning, development assessment, infrastructure delivery processes and compliance. The exact nature of these implications are not known at this stage and will become clear through the process of developing regulations and other guidance documents over a period of time).

4. Major projects should include a Cultural Heritage Study undertaken by the Aboriginal Party, especially Study's that require an Environmental Impact Statement or ground disturbance on a material level such as greater than 1 ha (10,000 m²). The Study must be done early as possible and as part of the initial feasibility so that the project infrastructure can be sited to avoid CHA, for example, where other studies such as ecology, traffic, stormwater assist the project design to reduce impacts and avoid harm.

5. Currently, CHA is self-regulating, usually without the support of the Traditional Custodians. The Kabi Kabi have become aware that some developers (including government) self-assess whether harm might occur without Traditional Custodian representatives. This has resulted in destruction of sites of significance and loss of cultural objects on numerous occasions. It is discouraging to report that very few prosecutions have occurred and those that have occurred have been involved in mining matters of a regional nature, and not through urban development.

6. CHA regulation and watchdog instruments need to be included as part of development assessments in Queensland, with overall oversight by the Minister of the appropriate department over the legislated instruments. It is proposed the appropriate State government body regulate on major projects and local government on smaller development assessments. The process is to be aligned with conduct mitigation outcomes through design focusing on regulatory requirements, Standards, Codes and Best Practice Management Guidelines. An outcome of the requirements is to provide an assessment process needs that clearly defines and determines if reasonable steps
have been satisfied to inform any statutory regulators of the level of significance and potential impacts during consultation and/or regulatory approvals process. Effectively the process highlights the inclusion of the Aboriginal party in the decision-making process. If a proponent fails to meet requirements to include an Aboriginal Party, then it is important for an Appeals process to be created to ensure effective decision-making and transparency.

7. DOC guidelines require amendment to require CHA clearance on lands that have been disturbed in recognition of the fact that farmed lands or lands subject to previous ground disturbance (forestry plantation, agriculture, grazing etc) still have significant Aboriginal cultural heritage values, such as buried artefacts or intangible cultural significance.

8. Site/location examples of the above (are attached in a following report). Case studies are described.

9. Other points on industry practices:

Sites of Aboriginal historical archaeology fail to be identified and assessed, and therefore fail to be incorporated into the management recommendations under CHMPs, by the consulting archaeologists. Intangible cultural heritage values (examples - ???) fail to be recognised, described and recorded by a number of non-Aboriginal archaeologists or heritage practitioners, despite the scope of the Aboriginal Cultural Heritage Act 2003, allowing for site recordings of same as ‘cultural areas’ or ‘intangible heritage’. Intangible heritage needs to be sufficiently described in CHMPs, and sensitively given specific management recommendations, as per instructions of the Traditional Custodians. Sites referred to in assessments or CHMPs are not being recorded on the DATSIP Cultural Heritage Unit database by a number of consulting archaeologists. Please research Australian Archaeology Association (AAA) guidelines for - best practice, code of ethics on background information, and training needs of non-Aboriginal archaeologists and consulting heritage organisations.

CONCLUSION

The Kabi Kabi support and recognise the need for appropriate planning and management of CHA values, though a number of concerns have been raised due to the lack of detail in the current process. The Kabi Kabi are mindful that Council must be able to provide services and infrastructure to the community in a timely manner, however, the inclusion of the identification and significance of Aboriginal places in planning documents is of paramount importance to meeting CHA values and objectives.

[Signature]

Chairman
KABI KABI PEOPLES CORPORATION
KABI KABI FIRST NATION

Submission to the 2019 CHA Review Team

As Kabi Kabi Traditional Owners of the Sunshine Coast region, south-east Queensland, we raise eleven concerns as to how the Aboriginal Cultural Heritage Act 2003 is experienced as substantially lacking. We offer recommendations as to how the Act can be changed, and work more effectively to deliver better land-use planning outcomes and community well-being.

Norman Bond
Chair & Applicant
To:

CHA Review
Department of Aboriginal and Torres Strait Islander Partnerships
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Email: CHA_Review@datsip.qld.gov.au
Phone: 07 3003 6384
29 June 2019

Dear CHA Review Team

As representatives of Kabi Kabi First Nation and as Traditional Owners of the Sunshine Coast region in south-east Queensland, we raise the following concerns and recommendations as to how the Aboriginal Cultural Heritage Act 2003 may be seen as substantially lacking, and how it can be changed to work more effectively. These proposals or concerns are given in the following eleven points. Three case studies or examples, relating to a number of cultural heritage issues, are described in section 12.

Yours sincerely

[Signature]

Norman Bond
Chair & Applicant
Kabi Kabi First Nation

C/ P & E Law
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Table of Contents

1.0 CULTURAL HERITAGE STUDY TRIGGER IS NEEDED FOR MAJOR PROJECTS ......................................................... 5

2.0 HERITAGE FAILINGS AND LOSSES AS A RESULT OF LAND-USER SELF-REGULATION AND SELF-ASSESSMENTS ........ 5

3.0 DEVELOPMENT ASSESSMENTS NEED TO INCORPORATE ACH REGULATION ..................................................... 6

4.0 STRENGTHENING DUTY OF CARE IN RELATION TO THE EXTENT OF PRIOR GROUND DISTURBANCE AND REMAINING ARCHAEOLOGY ................................................................................................................................. 6

5.0 REVISITING THE MEANING OF A SIGNIFICANT ABORIGINAL AREA (ABORIGINAL CULTURAL HERITAGE ACT 2003) IN RELATION TO INTANGIBLE HERITAGE ...................................................................................................................... 7

6.0 LEGISLATIVE CHANGES REQUIRED TO ACHIEVE AGENCY AND PARITY IN THE NEEDED ROLES FOR ABORIGINAL RANGERS WITH THAT OF EXISTING NON-ABORIGINAL RANGERS ......................................................... 7

7.0 CULTURAL HERITAGE MANAGEMENT PLANS ARE REQUIRED FOR SITES OF ABORIGINAL HISTORICAL ARCHAEOLOGY AND INTANGIBLE HERITAGE ....................................................................................................................... 8

8.0 HAVING DUE REGARD FOR THE PURPOSE OF THE DATSIP CHU DATABASE AS A PLANNING TOOL TO RECORD ABORIGINAL CULTURAL HERITAGE ........................................................................................................ 11

9.0 TO MANAGE IS TO MEASURE IS TO REPORT IS TO BE ACCOUNTABLE IS TO BE TRANSPARENT – NEED FOR THE EXTENDED USE OF AUDITS, STATISTICS AND STATE OF ABORIGINAL HERITAGE REPORTING .................................................................................................................. 12

10.0 DESTRUCTION OF ABORIGINAL SITES – SAYING 'GOODBYE TO COUNTRY' CAN RESULT IN POST-TRAUMATIC STRESS AND REDUCED COMMUNITY WELL-BEING ............................................................................ 14

11.0 ILLEGAL REMOVALS (COLLECTIONS) AND SALES OF ABORIGINAL ARTEFACTS IN QUEENSLAND BY NON-TRADITIONAL OWNERS ............................................................................................................. 15

12.0 CASE STUDIES .................................................................................................................................................. 17
Kabi Kabi First Nation submission to the 2019 review of the ACHA 2003

Figure 1 - DATSIP CHU site recording submission form with a list of the types of sites or objects that can be recorded on the database

Figure 2 - State of the Environment reporting (heritage component) presenting information from 2012 to 2016 on the numbers and types of sites recorded in Southern Queensland

Figure 3 - An example of a collection from the Sunshine Coast of Aboriginal artefacts listed for sale on eBay in 2019 (stating "the original owner having been collecting them for decades")
1.0 Cultural Heritage Study trigger is needed for major projects

A Cultural Heritage Study (CHS) with the full involvement of the Aboriginal Party should be undertaken for all major projects – those that require an EIS or involve ground disturbance on a material level such as greater than 1 ha (10,000 m2). The CHS must be done early, as part of the initial feasibility, so that the project infrastructure can be sited to avoid Aboriginal Cultural Heritage (ACH). For Traditional Owners, this needs to be delivered in the way that provides parity and agency with other studies such as ecology, visual amenity, traffic, stormwater etc. assist the project design to reduce impacts and avoid harm.

2.0 Heritage failings and losses as a result of land-user self-regulation and self-assessments

Currently ACH is self-regulating and this is failing badly. Some developers and land-users (including government) self-assess whether or not harm might occur. This has failed Aboriginal Parties on numerous occasions resulting in destruction of sites of significance and loss of cultural objects. Self-assessment is not logical, due to the lack of training of proponent personnel in heritage practices (for example, in comparison, a four-year university undergraduate in archaeology may require another 3 to 6 years of on the job training before working unsupervised on a project). Very few prosecutions have occurred, and those that have occurred have been regional mining matters, not urban development. The number of proponent-reported finds (resulting in CHU database recordings) of Aboriginal sites, objects or artefacts, are most likely minimal or insignificant, and attest further to the failings of self-assessment.
3.0 Development assessments need to incorporate ACH regulation

ACH regulation needs to be included as part of development assessment in Queensland, with overall oversight by the Minister. State government can regulate on major projects and local government for smaller development assessment. The regulator must assess what steps have been taken to manage ACH, whether the Aboriginal Party has been involved and overseen any mitigation or management. If satisfied the proponent has taken all reasonable steps then the regulator can approve the development proposal. If dissatisfied, an Aboriginal Party can exercise third party appeal rights to ensure effective decision-making and transparency.

4.0 Strengthening Duty of Care in relation to the extent of prior ground disturbance and remaining archaeology

*Duty of Care* guidelines have need of amendment and strengthening to require ACH clearance on lands that have been disturbed, in recognition of the fact that farmed lands or lands subject to previous ground disturbance (forestry plantation, agriculture, grazing etc.), still have significant Aboriginal cultural heritage values, such as buried artefacts or intangible, cultural and/or historical significance. Prior ground disturbance at a site does not, in any rational way, equate to a complete loss or removal of objects, or result in a land area or soils, completely free of objects or artefacts of significance. Prior ground disturbance, in many cases, does not equal total annihilation of in-situ archaeology.
5.0 Revisiting the meaning of a significant Aboriginal area (*Aboriginal Cultural Heritage Act 2003*) in relation to intangible heritage

It is useful to revisit the ACHA 2003 meaning of significant Aboriginal area, in relation to the extent of types of site recordings that can be entered on the DATSIP CHU database. Many non-Aboriginal or compliance based archaeological consultancies are, unfortunately, solely focussed on assessing and reporting on artefacts or traditional, material objects, at the exclusion of areas or sites possessing significant, intangible or historical heritage.

9  **Meaning of significant Aboriginal area**

A **significant Aboriginal area** is an area of particular significance to Aboriginal people because of either or both of the following—

1. (a) Aboriginal tradition;

   *Editor's note—*

   Under the *Acts Interpretation Act 1954*, section 36 (Meaning of commonly used words and expressions), *Aboriginal tradition* means the body of traditions, observances, customs and beliefs of Aboriginal people generally or of a particular community or group of Aboriginal people, and includes any such traditions, observances, customs and beliefs relating to particular persons, areas, objects or relationships.

2. (b) the history, including contemporary history, of any Aboriginal party for the area.

(ACHA 2003:12)

6.0 Legislative changes required to achieve agency and parity in the needed roles for Aboriginal rangers with that of existing non-Aboriginal rangers

Just as the State and local government have rangers and environmental protection officers, so too should there be a role created through legislation for Traditional Owner rangers, in
the audit, monitoring, and management of cultural heritage sites. Such jobs need to be of a secure and long-term basis. Crucially, these roles help to develop a sense of agency for Traditional Owners.

7.0 Cultural heritage management plans are required for sites of Aboriginal historical archaeology and intangible heritage

Sites of Aboriginal historical archaeology fail to be identified and assessed, and therefore are omitted from the management recommendations given within cultural heritage management plans (CHMPs), by the consulting archaeologists. It is the recent experiences of a number of Kabi Kabi Traditional Owners working with non-Aboriginal archaeological consultants, developer and council representatives, that any historical stories, interpretations or oral histories shared on site during a cultural heritage site assessment, are ignored. Such sites and their cultural heritage assessments are left with no Aboriginal historical archaeology (historical or colonial context), being assessed or recorded. This is a very stressful and hurtful situation of loss for Traditional Owners to have to endure, repeatedly. It often means that the stories and places of the recently passed generations of Ancestors are spoken of by Traditional Owners but not noted, heard or recorded by non-Aboriginal heritage practitioners. Refer to Figure 1 for a list of the types of areas (sites) or objects (artefacts), including historical and cultural, that can be recorded on to the DATSIP’s Cultural Heritage Unit database.
Intangible cultural heritage values attached to sites (see list of examples below) fail to be recognised, described and recorded by a number of non-Aboriginal archaeologists or heritage practitioners, despite the scope of the ACHA 2003, allowing for site recordings of same as 'cultural areas' or 'intangible heritage'. Intangible heritage values of an area or object need to be described after discussions with and interpretation by Traditional Owners.

<table>
<thead>
<tr>
<th>Aboriginal and Torres Strait Islander cultural heritage database Record</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Number: First Bay artefact</td>
</tr>
</tbody>
</table>

Mandatory fields *

<table>
<thead>
<tr>
<th>Location</th>
<th>Recording &amp; Consultation</th>
<th>Land Info</th>
<th>Environmental Setting</th>
<th>Condition &amp; Management</th>
<th>Component Forms</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supporting Documentation</td>
<td>Submission</td>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

Site Attributes

- Add New Cultural Place Component Form
- Add New Historical Place Component Form
- Add New Ancestral Remains (Burial) Component Form
- Add New Ancestral Remains (Reinterment) Component Form
- Add New Artefact Scatter Component Form
- Add New Earth Feature Component Form
- Add New Engraving Component Form
- Add New Object Collection Form
- Add New Quarry Component Form
- Add New Rock Art Component Form
- Add New Scarred Tree Component Form
- Add New Shell Midden Component Form
- Add New Stone Feature Component Form

Figure 1 - DATSIP CHU site recording submission form with a list of the types of sites or objects that can recorded on the database

Such intangible heritage needs to be sufficiently described in CHMPs, and sensitively given specific management considerations and recommendations, as per the instructions of the Traditional Owners.

Examples of intangible heritage at sites include:
- stories, story-places and song lines
- Dreaming tracks
- Law grounds
- Burials, reburials of ancestors and historical burials
- massacre sites
- birthing places
- traditional and historical pathways
- traditional hunting grounds and sources and species of plants and animals used in traditional foods and medicines (e.g. cultural resource areas)
- coastal landscapes, waterways and water sources
- cultural landscapes
- intellectual property
- oral histories
- constellations
- old-growth trees and old growth forests (considered as family to many Traditional Owners)
- any type of marked (mature) tree or scarred tree and uniquely shaped or (naturally) marked rock (crevices or hollows) can present (at times) in an especially meaningful way to Traditional Owners, and be of spiritual heritage significance, particularly when set in or along a well-known, traditional and ancestral site or waterway
8.0 Having due regard for the purpose of the DATSIP CHU database as a planning tool to record Aboriginal cultural heritage

Reference is made to the ACHA (2003:34-35), 'Part 5: Collection and management of Aboriginal cultural heritage information'. The Act in section 39 states that the,

**Purpose of establishing database**

1. (1) The purpose of establishing the database is to assemble, in a central and accessible location, information about Aboriginal cultural heritage.
2. (2) The database is intended to be a research and planning tool to help Aboriginal parties, researchers and other persons in their consideration of the Aboriginal cultural heritage values of particular areas.

Sites, areas, objects or artefact finds described or referred to in cultural heritage assessments or CHMPs, aren't being recorded on the DATSIP CHU database by a number of consulting archaeologists. Such actions are disrespectful to Traditional Owners and disrespectful to the intent and purpose of the Act. It is recommended that the CHA Review team flag this issue, and address same by helping to educate heritage consultants to record all sites and objects, in particular those pointed out during a cultural heritage assessment by the Traditional Owners. Otherwise, organisations such as the *Australian Archaeological Association* or the *Australian Association of Consulting Archaeologists* (and universities teaching archaeology, heritage and history) can help educate members or students on this issue.
9.0 To manage is to measure is to report is to be accountable is to be transparent – need for the extended use of audits, statistics and state of Aboriginal heritage reporting.

Queensland implements the State of Environment reporting (including a heritage component), being an acceptable international standard for assessing environmental performance. Such a format can have users interact through a web-based environment, querying spatial data and maps, with regionally-specific interpretive text, tables, graphs and charts. The data is derived from an array of thematic sources, collated, analysed and presented through the Queensland Government’s open data portal.

The Act should be changed to allow for the provision of Traditional Owner/Aboriginal Party requests of statistical information from the database. Types of information requests may include the total number of site recording types, and numbers of database site searches by developers, project proponents and other land-users. In a wider sense, more detailed reporting or auditing on the ‘State of Aboriginal Cultural Heritage’ needs to be developed and implemented. Crucially, the extent and numbers of areas of Aboriginal cultural heritage, having been disturbed or destroyed needs to be measured, mapped and statistically reported on, and in reference to the boundaries (catchment) of specific native title claim areas. In order to get a sense of scale, as to what ACH is being conserved and proactively managed, in comparison to what ACH is being disturbed and lost, is vital to Traditional
Owners, so as to provide meaningful measurements on how heritage, as a whole, is being recorded, monitored and sustainably conserved or managed.

Figure 2 – State of the Environment reporting (heritage component) presenting information from 2012 to 2016 on the numbers and types of sites recorded in southern Queensland
10.0 Destruction of Aboriginal sites – saying ‘goodbye to Country’ can result in Post-Traumatic Stress and reduced community well-being

A substantial number of sites possess features of significant ‘intangible heritage’. Such sites are very much at risk and fail to be recognised and recorded on the CHU database. As development pressure expands, these sites continue to be lost, without consultation with the Aboriginal Party. How do you gauge such impacts on the emotional well-being and feelings of Traditional Owners? Such experiences are commonly pushed aside and ignored, by non-Aboriginal people and decision-makers. This continuous ‘Sorry Business’ of saying goodbye to Country pushes Aboriginal People into different stages of Post-Traumatic Stress Disorder. These impacts of loss need to be spoken of, and become a key part of the narrative in the discussions of the ACHA 2003 review. Such impacts can be measured, and are crucial to review, in consideration of the mental and physical health of the Aboriginal People who are affected. Social Impact Assessments, incorporated into the processes of EIS and CHS, need to be undertaken so as to grasp the full extent of repercussions, especially the effects and outcomes on health and well-being.
11.0 Illegal removals (collections) and sales of Aboriginal artefacts in Queensland by non-Traditional Owners

Section 26 of the *Aboriginal Cultural Heritage Act* makes it an offence for a person to possess an object that is Aboriginal cultural heritage, but not if the person owns the object or is acting with the owner's agreement.

Artefacts originally collected prior to the introduction of cultural heritage legislation in 1969 are owned by the collector and any subsequent person to whom title is legitimately transferred e.g. by sale or gift.

The chances of a successful prosecution in cases like this are extremely low. Consequently, the investigators are generally not prepared to devote their limited resources to these types of cases.

Reference is made to situations outside of the above-described legal framework, whereby Aboriginal artefacts are illegally collected, held and then intended to be sold. The State (and community-based heritage groups) could be encouraged to proactively approach and help educate the management of online services such as eBay, Gumtree and Facebook, who may, from time to time, carelessly assist in the illegal sale of Aboriginal artefacts.
Kabi Kabi First Nation submission to the 2019 review of the ACHA 2003

The holders of such artefacts could also be approached and persuaded to consider the ethical and moral imperatives to return such items to the proper Traditional Owners and Aboriginal Party. The Act could make a statement to this affect.

Figure 3 - an example of a collection from the Sunshine Coast of Aboriginal artefacts listed for sale on eBay in 2019 (stating 'the original owner having been collecting them for decades')
12.0 Case studies

12.1 Case study 1a – Mount Coolum and the Sunshine Coast Airport Expansion

Mount Coolum is on north side of the Maroochy River and just 100km north of Brisbane. Mount Coolum is considered the ‘Uluru’ of the Sunshine Coast by many Kabi Kabi Traditional Owners, as well as residents.

Sunshine Coast Council have a $605 million airport expansion project just to the south. A $920,000.00 summit and track upgrade and construction project is being undertaken by Queensland Parks and Wildlife Service, who manage Mount Coolum. Despite all this construction activity, a Cultural Heritage Study or a cultural heritage management plan has not been implemented specifically for Mount Coolum National Park. This highly significant site has been recorded on the DATSIP CHU database for a number of years.
12.2 Case study 1b – Mount Coolum: 'Uluru' of the Sunshine Coast with no Cultural Heritage Management Plan

Used by rock-climbers, the Cave Shelter on the south eastern side of Mount Coolum, has been defaced by 300 or more carabiners (bolts and hooks), yet the Kabi Kabi have not been consulted for the development of a much needed Cultural Heritage Study or cultural heritage management plan.
12.3 Case study 2 – historical Bli Bli shop and swimming pool on the Maroochy Estuary

The old Bli Bli shop, situated on a recorded Aboriginal historical site, was demolished in 2018. A historical archaeological report was requested by letter of the developer and consulting archaeologist. This request was ignored and the historical archaeology of the site was dismissed, without a historical investigation or cultural heritage assessment. Kabi Kabi People, including the Jones family, pictured in the above, have been using this shop for the last 40 or 50 years, and the swimming pool in past decades. Their local history stories never got to be formally recorded or acknowledged.
12.4 Case study 3 – Twin Waters West development site on the Maroochy Estuary – a traditional and historical Aboriginal area

Twin Waters West on the Maroochy Estuary has substantial intangible heritage values, including Kabi Kabi traditional and historical (colonial) cultural heritage values, needing a comprehensive cultural heritage assessment, or preferably, a Cultural Heritage Study and Social Impact Statement.

Above left: 1958 aerial map of coastal lowlands: wallum, kangaroo and emu resources area, now Twin Waters West. Kabi Kabi lived and worked here over the eras of colonisation.

Above right: 1868 survey map indicating the wallum and Bungwell fern staple along the Meroochy Estuary.
Kabi Kabi First Nation submission to the 2019 review of the ACHA 2003

13.0 Bibliography


AIATSIS 2012 Guidelines for ethical research in Australian Indigenous studies. ACT, Canberra: Australian Institute of Aboriginal and Torres Strait Islander Studies.


Reconciliation Australia 2018 *The State of Reconciliation in Australia: our history, our story, our future*. Kingston, NSW: RA.


14.0 Appendix

14.1 Appendix - DES 2018 media release: Upgrade for Mount Coolum summit trail

29 August 2018

The summit viewing area and top section of the Mount Coolum National Park walking track will be closed to the public between 7am and 5pm weekdays from Wednesday 29 August to Friday 16 November 2018, due to upgrade works.

Queensland Parks and Wildlife Service has already invested $500,000 to upgrade the heavily degraded summit walking trail and a further $420,000 has been allocated to complete the upgrade and protection measures on the summit trail.

For safety reasons, public access will only be possible to halfway up the mountain during closure times. The walking track will still be open on weekends.

On Thursday 30 August the track will be closed to all public access from 7am to 5pm due to a helicopter lifting materials onto the track.

Queensland Parks and Wildlife Service (QPWS) Senior Ranger Omar Bakhach said closures would be kept to a minimum.

"The works are aimed at reducing impacts on the trackside vegetation and the important montane vegetation found around the summit," Mr Bakhach said.

"Track upgrades in 2012 to address severe erosion along the trail were well received by users, and many people now walk the trail multiple times a week.

"Feedback about the trail since the 2012 works has been overwhelmingly positive, which is also reflected in visitor numbers. The most recent QPWS data for Mount Coolum shows an increase over the past five years from around 40,000 annual visitors to more than 200,000 a year, and we're seeing similar trends at many of our national parks on the Sunshine Coast.

"As with many other popular locations, the Mount Coolum summit trail is now showing impacts of high visitor use such as trampling of vegetation and widening of the track, and we need to take steps to address these issues.

"We have this beautiful asset that dominates the coastal landscape, provides recreational opportunities, and is a tourism drawcard, so it's important that we provide an appealing, high quality and resilient product, which caters for current visitors and future increases," he said.

Mr Bakhach said works would include tidying up and defining the main track, defining viewing areas on the summit, installing new interpretive signage, and closing informal tracks and rehabilitating those damaged areas.

"QPWS appreciates the public's patience during the period of works, and ask visitors to observe all track closures, safety signage and directions from rangers and contractors."