Summary of Changes: Changes to cultural heritage approvals; responsibilities clarified; format changes
## Table of Contents

1. Purpose .................................................................................................................. 3
2. Scope ...................................................................................................................... 3
3. Framework ............................................................................................................. 3
   3.1 General .............................................................................................................. 3
   3.2 Aboriginal Cultural Heritage ............................................................................. 4
   3.3 Non-Aboriginal Cultural Heritage ................................................................. 4
4. Requirements ........................................................................................................ 5
   4.1 General Duty .................................................................................................... 5
   4.2 Cultural Heritage Induction ............................................................................ 5
   4.3 Cultural Heritage Assessment ......................................................................... 5
   4.4 Cultural Heritage Discovery .......................................................................... 6
      4.4.1 For confirmed or unconfirmed human skeletal remains or burial .......... 7
      4.4.2 Data management for cultural heritage discovery ............................... 8
   4.5 Compliance Actions ........................................................................................ 8
   4.6 Incident Management System ........................................................................ 8
   4.7 Document Management .................................................................................. 9
5. Records and Documentation .................................................................................. 9
6. Training Requirements ......................................................................................... 10
7. How to Guides and Audit Tools .......................................................................... 10
8. Definitions and Responsibilities .......................................................................... 10
9. User Feedback and Document Control .............................................................. 10
1 Purpose

This standard describes the processes required to manage risk and avoid impacts to cultural heritage and ensure compliance with all legal obligations and cultural heritage agreement commitments across all Santos activities in a manner that is comprehensive, documented and auditable.

2 Scope

This standard applies to all Santos activities undertaken in Australia, both onshore and offshore in Australian waters.

Santos sites located outside Australia should use relevant sections of this standard to guide their activities and ensure that they have identified, and comply with, the relevant legal obligations in their area of operations.

This standard may be used in conjunction with other EHSMS standards that address risks associated with land disturbance and management, including:

- EHS01 Biodiversity and Land Disturbance
- EHS06 Environmental Impact Assessment and Approvals
- HSHS02 Land Transportation
- HSHS19 Excavations

3 Framework

3.1 General

Aboriginal and non-Aboriginal cultural heritage is encountered in all areas of Santos onshore and offshore Australian operations.

Aboriginal and non-Aboriginal cultural heritage is protected by legislation in all Australian states and territories, with specific reporting obligations to relevant authorities, and where required, to Aboriginal stakeholder groups.

All Santos activities must be undertaken in a manner that minimises risk and avoids impacts to cultural heritage. This is achieved by all Santos personnel and contractors undertaking activities in accordance with the requirements of this standard.

Risk to cultural heritage arises from:

- Not having completed mandatory cultural heritage induction
- Not obtaining approved cultural heritage assessments before commencing land disturbance activities;
- Not reporting new cultural heritage discoveries; and
- Not keeping driving and foot access on Santos sites restricted to approved roads, tracks and pipeline rights-of-way.

The framework for this standard is outlined in Figure 1.

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1 Santos activities cover the lifecycle of oil and gas operations and include: exploration, development, construction, production, processing, decommissioning and abandonment. Santos activities may be stand-alone projects or ongoing activities. Activities may be undertaken by Santos personnel or contractors.

2 Land disturbance is an event or circumstance that disturbs soil or vegetation, that includes but is not limited to:
   - Areas where soil has been broken, excavated, compacted, removed, covered, exposed or stockpiled
   - Areas where vegetation has been removed or destroyed to an extent where the land has been made susceptible to erosion
   - Areas where land use suitability or capability has been diminished (e.g. no longer able to be used as cropping land)
The Manager, Aboriginal Participation provides functional leadership for cultural heritage. The Cultural Heritage Team within each Business Unit (BU) is responsible for managing the cultural heritage system to minimise risk and avoid impacts to Aboriginal and non-Aboriginal cultural heritage.

### Cultural heritage requirements

#### Cultural heritage duty
- All Santos personnel and contractors must undertake activities in a manner that avoids impact to cultural heritage

#### Cultural heritage induction
- All Santos personnel and contractors must undertake role and location specific cultural heritage induction requirements prior to any activity

#### Cultural heritage approval
- Cultural heritage approval must be obtained for all land/ground disturbing activity and for any travel that is off approved roads and tracks

#### Cultural heritage discovery
- Where cultural heritage or suspected cultural heritage is discovered activity must stop immediately and notifications occur

#### Cultural heritage compliance actions
- Compliance Actions will be specified, must be completed and are a mandatory condition of cultural heritage assessment approval.

#### Cultural heritage non-conformances
- Cultural heritage procedure non-conformances must be entered into the IMS

#### Cultural heritage document management
- Cultural heritage documents must be managed in the BU Cultural Heritage teamsites

**Figure 1. Cultural heritage requirements**

### 3.2 Aboriginal Cultural Heritage

Aboriginal cultural heritage includes artefacts and other physical evidence of Aboriginal life, or is a place of cultural, spiritual or religious importance. It includes areas, sacred sites, sites, places and objects and physical evidence left by Aboriginal people, such as rock art, stone arrangements, stone tools and scar trees.

Aboriginal cultural heritage also includes natural features and areas with no obvious material evidence of human activity such as a hill or rock outcrop that represents a place in a story, songline, creation story or a ceremonial place.

### 3.3 Non-Aboriginal Cultural Heritage

Non-Aboriginal cultural heritage includes sites, artefacts and objects that, with written documents, help contribute to our understanding of Australia’s recent history. Examples include, but are not limited to: buildings, structures, shipwrecks and other below water and near shore structures, archaeological sites and cultural landscapes left by explorers, settlers and miners.
4 Requirements

4.1 General Duty

All Santos personnel and contractors must undertake Santos activities in a manner that minimises risk and avoids impacts to cultural heritage.

4.2 Updates Resulting from Changes to Legislation

The BU Cultural Heritage Team Leader must liaise with legal counsel and the Manager, Aboriginal Participation, on notice of any changes to legislation that may affect legal obligations or cultural heritage agreement commitments. The Manager, Aboriginal Participation must review this standard, the Procedure for the Management of Cultural Heritage Sites: A Handbook for Personnel and Contractors and associated documents once each calendar year or as required by changes to legislation.

4.3 Cultural Heritage Induction

All Santos personnel and contractors must undertake role and location specific cultural heritage inductions prior to approving or undertaking any activity or travelling to a field location in accordance with the requirements of the How to Guide: Complying with Cultural Heritage Induction Requirements. Inductions remain current for 36 months and must be renewed after this time. General EHS induction requirements are outlined in EHSMS06 Training and Competency.

Level 4 Managers must:

- Notify the BU Cultural Heritage Team, via the relevant Contract Site Representative if relevant, of any Santos personnel and contractors entering the field, both newly engaged or transferring from other regions or jurisdictions;
- Ensure Santos personnel and contractors are available for training when it is scheduled; and
- Ensure that Santos personnel and contractors have completed or have cultural heritage inductions scheduled prior to being issued with passes to visit Santos field sites.

BU Cultural Heritage Teams must:

- Schedule presentations and refreshers based on personnel movement, operational requirements and information provided by managers and contractors;
- Provide induction packages in accordance with the requirements of this standard and to review and update them as required to comply with this Standard; and
- Maintain registers of cultural heritage induction sessions, attendees and content in accordance with the requirements of the How to Guide: Complying with Cultural Heritage Induction Requirements.

4.4 Cultural Heritage Assessment

Level 4 Managers must have all Santos activities that have potential to disturb land, and therefore impact cultural heritage, assessed for cultural heritage risk prior to undertaking any onground activity, in accordance with the requirements of the How to Guide: Requesting Cultural Heritage Assessment.

Assessment is required for land disturbance activities undertaken on any land including Crown Land, private land and pastoral land.

As soon as possible after identifying the location and timing of any land disturbance activities, the Level 4 Manager must ensure contact is made with the BU Cultural Heritage Team to determine the appropriate cultural heritage assessment timeframe. There are minimum timeframes that vary between jurisdiction and region required for submission of CHAR forms. Refer to the How to Guide: Requesting Cultural Heritage Assessment for more information about timeframe requirements.
The BU Cultural Heritage Team must assess and approve, if acceptable, the cultural heritage assessment request.

Level 4 Managers must ensure that all:

- Conditions are completed as required in approved CHAR form; and
- Approved CHAR forms are attached to any required excavation packs (refer to HSHS19 Excavations for more information).

4.5 Cultural Heritage Discovery

Cultural heritage may be identified when undertaking any onshore or offshore Santos activity. Most frequently, cultural heritage is encountered during initial field scouting and line-of-sight surveys, or during cultural heritage clearances. Less frequently, cultural heritage is identified during operational activities and after cultural heritage assessment approvals have been obtained.

4.5.1 Immediate Action after a Cultural Heritage Discovery

Where cultural heritage, including skeletal remains, is discovered, the person discovering the cultural heritage must undertake the following actions immediately, even if an approved cultural heritage assessment is in place:

- Stop all activity that could, in any way, interfere with or disturb the discovered cultural heritage;
- Declare and place a 50m radius exclusion zone around the cultural heritage discovery (note: yellow and red flagging is recognised as flagging for cultural heritage);
- Notify the site supervisor (Level 6 Manager) by email but verbally as well if it expedites notification to the Cultural Heritage Team; and
- Notify the BU Cultural Heritage Team by email but verbally as well if it expedites their notification.

The Level 6 Manager must issue a stop work order as soon as they are notified of the cultural heritage discovery or the order is issued by the Cultural Heritage Team.

No activity can be undertaken within the exclusion zone until the stop work order is removed by notification in writing by the BU Cultural Heritage Team.

A Cultural Heritage Discovery (Discovery) form must be submitted to the BU Cultural Heritage Team, in accordance with the requirement of the How to Guide: Completing a Cultural Heritage Discovery Form.

4.5.2 BU Cultural Heritage Team Discovery Assessment

The BU Cultural Heritage Team must assess Discovery forms and determine the appropriate actions to be undertaken. Any actions required must:

- Minimise risks and avoid impacts to cultural heritage discoveries; and
- Ensure that onground activities are undertaken in accordance with:
  - Cultural heritage agreement commitments;
  - Legal obligations; and

Actions required may be one or more of the following:

- Enter the cultural heritage discovery in the GIS;
- Advise police, relevant authorities, Aboriginal stakeholder groups;
- Approve re-start (continuation of activity);
- Require mitigation or avoidance actions; and
- Issue further stop-work orders.
If required, the BU Cultural Heritage Team must negotiate with the relevant Aboriginal stakeholder group. Negotiation may include to mitigate (relocate) cultural heritage sites in order to minimise risk and avoid impacts to them.

Mitigation (movement) of cultural heritage must only be done with the authority of the Aboriginal stakeholder group. A new Discovery form must be completed by the Cultural Heritage Team member engaged in these discussions to record the new location of moved cultural heritage. The original documentation must record the original location of cultural heritage discoveries, but these locations must not to be recorded in the GIS.

4.5.3 Actions after a cultural heritage discovery assessment

Activity cannot restart within the exclusion zone until written authority is given by the BU Cultural Heritage Team. Depending on legal obligations and cultural heritage agreement commitments, there may or may not be discretion to commence work.

Following completion of the discovery assessment process, the BU Cultural Heritage Team must notify:

- The relevant Level 4 Manager of any Compliance Actions required; and
- The relevant Level 6 Manager in writing if the stop work order can be lifted and any onground actions, including Compliance Actions that will support the lifting of that order.

Refer to Section 4.6 for more information about Compliance Actions.

The Level 6 Manager must ensure that onground activities are undertaken in accordance with actions specified by the BU Cultural Heritage Team. Any mitigation (relocation) of cultural heritage must be done as directed in the Discovery form.

When available on site, Cultural Heritage Field Supervisors can provide advice on minimising risk and avoiding impacts to identified cultural heritage.

4.5.4 For confirmed or unconfirmed human skeletal remains or burial

Where a cultural heritage discovery is obviously human (e.g. teeth/skull visible), the burial site must be verified by the Cultural Heritage Officer, and an independent expert or police, in line with state legislation.

Where a cultural heritage discovery cannot be readily verified, and where no independent expert is available at the time of discovery, the BU Cultural Heritage Team must raise a Compliance Action to engage an independent expert to assess the discovery (refer to Section 4.6 for more information about Compliance Actions). This assessment must take place as soon as practical, and no more than 10 business days, after initial identification.

If human skeletal remains or burial sites are confirmed, the BU Cultural Heritage Team must:

- Notify police immediately;
- Raise a Compliance Action to report the cultural heritage immediately to the relevant authority in accordance with the relevant state legislation (refer to Section 4.6 for more information about Compliance Actions);
- Reclassify the discovery as “Confirmed human remains or burial” in the Discovery form;  
- Notify the relevant Aboriginal stakeholder groups formally in writing of human remains or burials, regardless of whether Cultural Heritage Officers have been involved in the discovery; and
- Update the relevant Discovery form, if confirmed as non-human skeletal remains/soil carbonate/false burials, to classify the discovery as “Not a cultural heritage site”.

Under no circumstances can there be a declaration of “not a cultural heritage site” without comprehensive supporting documentation.
The Compliance Action must include:

- The requirement to compile a report; and
- The date by which a report must be submitted to the relevant authority.

4.5.5 Data management for cultural heritage discovery

The BU Cultural Heritage Team must ensure that:

- Discovery forms:
  - Have all documentation relating to confirmed or unconfirmed human remains and reportable cultural heritage attached in Part C “Compliance Details”, including:
    - Notification to the police, relevant authority and Aboriginal stakeholder group
    - Confirmation or otherwise of human skeletal remains (e.g. archaeologist report, e-mail)
  - Include references to CHAR forms and the GIS
- Information on cultural heritage discoveries is exported to the GIS monthly;
- Any cultural heritage GIS record is deleted if it does not relate to an approved cultural heritage discovery documentation;
- Access to the cultural heritage cleared layer is restricted to Santos cultural heritage personnel (e.g. BU Cultural Heritage Teams);
- Locations of confirmed human remains and burials are uploaded to the GIS; and
- Locations with the status of “unconfirmed” or “not a cultural heritage site” remain on the BU Cultural Heritage Teamsite and are not uploaded to the GIS.

4.6 Compliance Actions

Compliance Actions are specific, non-routine tasks, actions or activities, usually triggered by cultural heritage approval requests and discoveries of cultural heritage. Compliance actions are required to be undertaken before, during or after land disturbance activities as a condition of approved cultural heritage assessment or discovery.

Compliance actions must be created and completed in accordance with the requirements of the How to Guide: Completing a Compliance Action.

The BU Cultural Heritage Team must assign Compliance Actions, via the EHS Toolbox, usually to the Level 4 Manager (the person responsible for the project works or activity) for whom the cultural heritage approval was sought or who is responsible for the area in which there was a discovery.

The Level 4 Manager must ensure:

- The compliance action is completed within the required timeframe; and
- Onground activities are managed to minimise risk to and avoid impacts to identified cultural heritage.

4.7 Incident Management System

Santos’ Incident Management System (IMS) is part of the Santos EHS Toolbox and is used to record any cultural heritage non-conformance and cultural heritage impacts, allocate remedial actions and ensure that appropriate people are notified. Cultural heritage non-conformances must be lodged within 24 hours of an event occurring.
A cultural heritage non-conformance must be submitted:

- When impact to cultural heritage occurs or is identified; and
- When non-conformance, or suspected non-conformance, with any part of the cultural heritage process is identified (e.g., unauthorised land disturbance activity, off road travel, or identified interference with cultural heritage).

In the IMS Investigation subform, a cultural heritage non-conformance must have the radio button that identifies an event as “related to Aboriginal or non-Aboriginal cultural heritage identified” check to Yes.

A cultural heritage non-conformance can be entered in IMS by anyone, but in the first instance, should be done by a manager (e.g., Level 6 or higher) for which the non-conformance is relevant. It can also be done by someone who observes an event, someone who becomes aware of a non-conformance or by the BU Cultural Heritage Team.

Cultural heritage non-conformances that involve on-ground disturbance of cultural heritage must be subject to major investigation in accordance with the requirements of EHSMS15 Incident Investigation and Response, as these non-conformances require notification to relevant authorities. The investigation team leader must be appointed by the relevant Level 4 Manager, in consultation with the Manager, Aboriginal Participation.

4.8 Document Management

Cultural heritage may be sensitive. Therefore cultural heritage information contained within Santos systems is confidential and generally restricted to Santos cultural heritage personnel. The Manager, Aboriginal Engagement is authorised to approve access.

All sensitive cultural heritage documentation must be endorsed with the following words:

Confidential: This document contains information relating to Aboriginal sites, objects, remains or traditions, and must be kept confidential. Disclosure of this information may be a criminal offence and may also offend Aboriginal peoples.

All material relating to discussions and communications with internal and external parties about cultural heritage approvals, cultural heritage agreements or issues must be maintained as a permanent record by the BU Cultural Heritage Team on the relevant BU Cultural Heritage Teamsite, as follows:

- EABU: Aboriginal Affairs/Cultural Heritage landing page
- QBU/GLNG: GLNG Aboriginal Engagement teamsite; and

The BU Cultural Heritage Team must assign all cultural heritage records a unique identifier to enable cross-referencing between cultural heritage documents and GIS.

5 Records and Documentation

- Cultural heritage induction registers are created to identify who has undertaken cultural heritage inductions and when they were undertaken.
- Cultural Heritage Assessment Request forms are created and approved prior to undertaking land disturbance activities.
- Cultural Heritage Discovery forms are created whenever cultural heritage or suspected cultural heritage is identified.
- Compliance Actions in EHS Toolbox are created as a condition of approval of a Cultural Heritage Assessment Request or discovery.
• Notifications to police, relevant authorities and Aboriginal stakeholder groups are created if human skeletal remains or burial sites are confirmed.
• Notifications to relevant authorities, and Aboriginal stakeholder groups if required.

6 Training Requirements

General EHS training requirements are outlined in EHSMS06 Training and Competency. Refer also to Section 4.3 for more information about cultural heritage induction. Other training must be determined by the BU/Function if applicable.

7 How to Guides and Audit Tools

<table>
<thead>
<tr>
<th>Title of Tool/Check/Assessment</th>
<th>Name</th>
<th>Description of when/where/how/by whom it should be used</th>
</tr>
</thead>
<tbody>
<tr>
<td>How to Guide</td>
<td>Completing a Cultural Heritage Clearance Request</td>
<td>This guide provides users with a comprehensive guide on securing Cultural Heritage Clearance approval for land disturbance activities</td>
</tr>
<tr>
<td>How to Guide</td>
<td>Completing a Cultural Heritage Discovery Form</td>
<td>This guide provides users with advice on when and how to report discoveries</td>
</tr>
<tr>
<td>How to Guide</td>
<td>Completing a Compliance Action</td>
<td>This guide provides users with advice on setting-up and completing a Compliance Action</td>
</tr>
<tr>
<td>How to Guide</td>
<td>Complying with Cultural Heritage Induction Requirements</td>
<td>This guide identifies correct induction for Santos personnel and contractors that is role and risk specific</td>
</tr>
</tbody>
</table>

8 Definitions and Responsibilities

Refer to the EHSMS Definitions and Acronyms, and EHSMS Responsibilities for further information.

9 User Feedback and Document Control

Users of this Standard are encouraged to report errors or confusing information, or to provide suggestions for improvement by contacting the EHSMS Coordinator.

Document control of the EHSMS is managed by the EHSMS Coordinator. The controlled copy of this standard is located on the EHSMS teamsite on the Santos intranet. Users of a printed copy of the standard are responsible for ensuring they have the current version. This can be achieved by ensuring the revision number in the footer of each page of the printed copy is the same as the revision number displayed against the standard on the Santos intranet.

This Standard will be reviewed by the Standard Custodian and Technical Sponsor (refer to EHSMS08 Document and Record Management – Appendix E) at a minimum on a three yearly basis.