



Dakabin Wildlife Hospital

Aboriginal Cultural Heritage Assessment

For the Kabi Kabi People

May 2025

Version 2

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GLOSSARY OF TERMS

ABBREVIATION	TERM
ACHA 2003	<i>Aboriginal Cultural Heritage Act 2003</i>
ACH	Aboriginal Cultural Heritage
CHA	Cultural Heritage Assessment
CMB	City of Moreton Bay
Converge	Converge Heritage + Community.
DEM	Digital Elevation Model
DWATSIPM	Department of Women, Aboriginal and Torres Strait Islander Partnerships, and Multiculturalism (formerly DTATSIPCA)
GSI/GI	Ground Surface Integrity/Ground Integrity
GSV	Ground Surface Visibility
Kabi Kabi People	Kabi Kabi First Nation Traditional Owners
NTD	Native Title Determination
REDD	Regional Ecosystem Description Database

GLOSSARY OF TERMS

For the purposes of this report, the following definitions apply:

- **Site** refers to all physical traces of Aboriginal occupation, including isolated artefacts.
- **Isolate** refers to a find-spot of a single artefact separated by more than 5m from other artefacts and/or associated archaeological features.
- **Artefact concentration** refers to a group of 2 or more artefacts (especially stone tools) located on the ground surface, with a distance of no greater than 5m between each. Low density artefact concentrations have ≤ 5 artefacts/m², medium density artefact concentrations have between 5-10 artefacts/m², high density artefact concentrations have ≥ 10 artefacts/m².
- **Culturally modified trees**, commonly called scarred or carved trees, if present, are assessed according to a detailed list of selection criteria developed by Converge that allow for some degree of scientific rigour to be applied to the identification process.
- **Shell Midden/ Scatter** may appear as sparse scatters or concentrations of shell on and below the ground surface and represent the remains of traditional food processing activities.

EXECUTIVE SUMMARY

The City of Moreton Bay (CMB) in conjunction with the Moreton Bay Wildlife Hospital Foundation are planning to construct a wildlife hospital and associated infrastructure at 420 Old Gympie Road (Lot 2 Plan SP291241), with the bulk of the construction to take place in the south-western section of the lot along Old Gympie Road. CMB requested the Kabi Kabi People to undertake an Aboriginal Cultural Heritage assessment of the Project Area and provide recommendations to avoid or mitigate any potential harm to Aboriginal Cultural Heritage that may result from the Project. The Kabi Kabi People in turn requested the assistance of Converge Heritage and Community (Converge) to provide them with Technical Advice which included producing this report.

The Project design is still in the early stages, but will involve the construction of a hospital building, carpark, and road access to Old Gympie Road, as well as landscaping for outdoor areas. It is understood that a range of ground disturbing activities will be required, including cut and fill, site leveling, and works associated with the installation of utilities. Road access will utilise part of an existing road and extend it along a new route through some bushland. CMB have not decided on a sewerage management system at this stage, with options being either constructing a sewer line through bushland to the east of the lot and connecting to the existing network (requiring approval by Urban Utilities), or if a self-contained sewerage management system will be constructed on-site.

The Kabi Kabi People in conjunction with Converge conducted a site survey of the Project Area in April 2025. Discussion in the field indicated that the proposed site for the hospital has been heavily disturbed, but that vegetated areas around the access road and potential sewer line hold significant ecological values and have a fairly intact ecosystem. One artefact was found in a previous survey of the area performed by CMB and will be registered in the DWATSIPM database. No tangible Aboriginal cultural heritage was located during this assessment.

Based on the background assessment and subsequent outcomes of the field assessment, management recommendations have been developed and are presented in Section 4.

1 INTRODUCTION

1.1 Background

The City of Moreton Bay (CMB) in conjunction with the Moreton Bay Wildlife Hospital Foundation are planning to construct a wildlife hospital and associated infrastructure at 420 Old Gympie Road (Lot 2 Plan SP291241). The development footprint, i.e., the Project Area is confined to the south-western section of the Project Lot along Old Gympie Road (See Figure 1). CMB requested the Kabi Kabi People to undertake an Aboriginal Cultural Heritage assessment of the Project Area and provide recommendations to avoid or mitigate any potential harm to Aboriginal Cultural Heritage that may result from the Project. The Kabi Kabi People in turn requested the assistance of Converge Heritage and Community (Converge) to provide them with Aboriginal Cultural Heritage Technical Advice which included producing this report.

Appendix A shows an approximate locality plan and a sketch made in the field to indicate road access and approximate size of the hospital complex. While the Project design is still in the early stages, it will involve the construction of a hospital building, carpark, and road access to Old Gympie Road, as along with landscaped outdoor areas. The proposed works will involve ground disturbing activities including cut and fills, site leveling and the installation of utilities. Road access will utilise part of an existing road running along the southern boundary of the Project Lot which will be extended north creating a new route through bushland. Sewerage management is required, however, CMB have not decided if this will be connected to an existing line at the eastern boundary of the lot through bushland thus requiring approval by Urban Utilities, or if a self-contained sewerage management system will be constructed on-site.

The Kabi Kabi People in conjunction with Converge conducted a site survey of the Project Area in February 2025. The planned Project Works will generally focus on the empty field, although remnant vegetation and high value regrowth will be impacted when constructing the access road extension, and the potential sewer line (see Section 2.2).

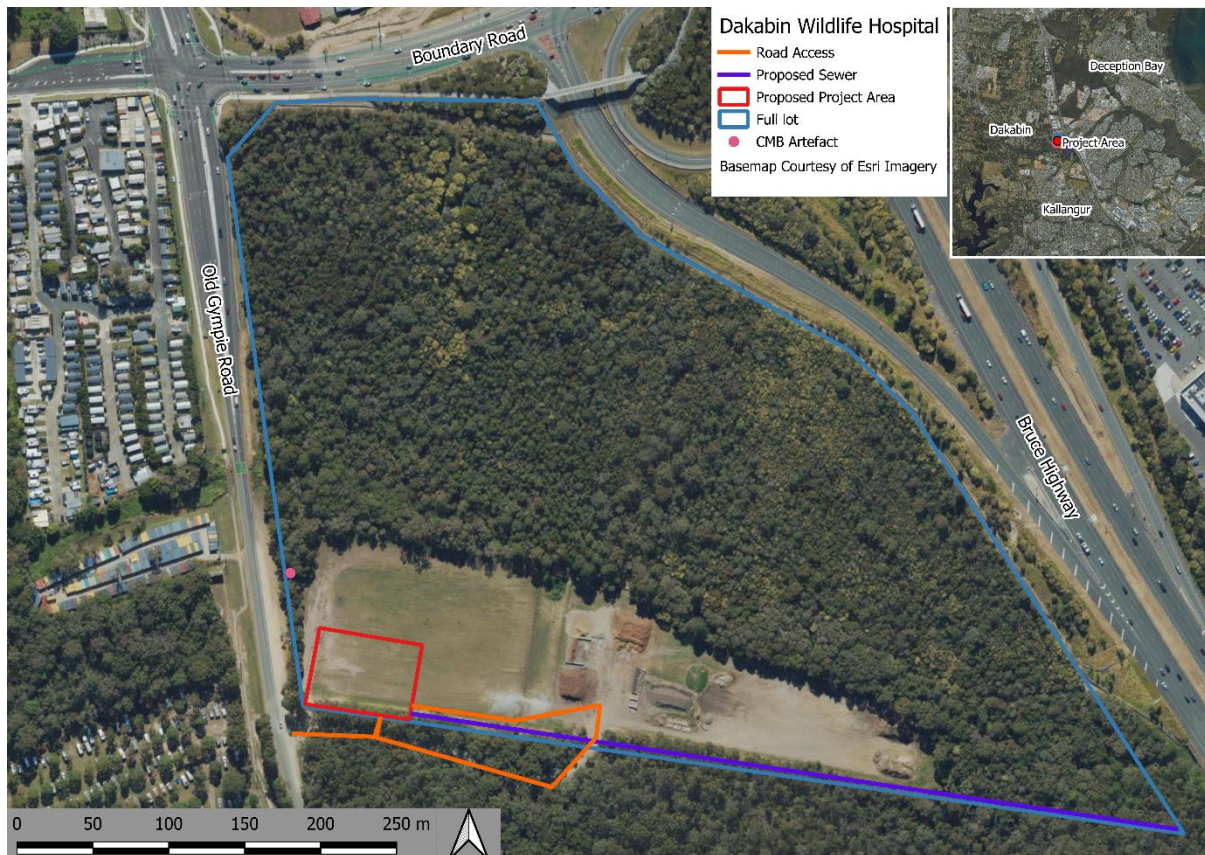


Figure 1: Map of Approximate Project Location

1.2 Aboriginal Party

The Aboriginal Party for the Project Area is the Kabi Kabi First Nation Traditional Owners Native Title Claim Group (QC2018/007, QCD2024/002, QUD20/2019; Kabi Kabi).

Please note: This report may contain confidential cultural information and intellectual property that has been provided specifically for the purposes of this study. This confidential cultural information and intellectual property cannot be used or transmitted in any way or by any method for any purpose beyond the specific requirements of this Project without the written consent of the Kabi Kabi people. Data concerning the location of both tangible and intangible cultural heritage and specifically relating to Project Area activities is available from the Kabi Kabi people if and as required.

1.3 Scope of Study

The scope of the study was to undertake a site survey and assessment to help establish Aboriginal Cultural Heritage values that may be present in the Project Area and develop appropriate strategies to manage impacts on Aboriginal Cultural Heritage and values by the proposed works. Specifically, the scope of the project was to:

- Engage with the Kabi Kabi People to determine their preferred methodology for undertaking the cultural heritage assessment and collate information relevant to the Project Area
- Conduct a review of readily available previous Aboriginal Cultural Heritage reports and studies for the Project area, inclusive of information provided by the Kabi Kabi People and from Converge's internal database

- Review available digital and GIS data to further aid in the development of predictive modelling, focusing on information available on Queensland Globe and other government digital resources.
- Conduct searches of relevant environmental and heritage databases and registers including the Department of Women, Aboriginal and Torres Strait Islander Partnerships, and Multiculturalism (DWATSIPM) cultural heritage database, and the Regional Ecosystem Description Database (REDD).
- Review proposed project plans to inform the undertaking of an impact assessment
- Undertake further consultation with relevant Kabi Kabi representatives as required
- Liaise with the Kabi Kabi People and Proponent to facilitate the undertaking of the survey
- Undertake a site assessment with Kabi Kabi representatives
- Accurately identify and map the location of heritage values, both objects and areas, within the Project Area.
- Provide recommendations regarding the significance and practical management of Aboriginal Cultural Heritage values and materials identified within the Project Area.
- Compile the results of the above into a Cultural Heritage Report (this report).

1.4 Dates and Duration of Work

The site assessment took place on 14th April 2025 with Kabi Kabi People representatives Drew Gulash and Norman Bond Snr and Converge technical advisors Christopher van der Westhuizen and Linden Gablonski. The CMB were represented by Ben McMullen, Jess Clayton, and Natalie Franklin, the Moreton Bay Wildlife Hospital Foundation by Ngaire Stirling and Christine West, and project architect Andrew Webb was also present.

1.5 Limitations

- Scope does not include an assessment of the Project's non-Indigenous cultural heritage values.
- The assessment focuses specifically on the Project Area and associated Project Activities and incorporated limited consultation with select Kabi Kabi People. It should not be viewed as a comprehensive assessment of the Aboriginal Cultural Heritage Values of the Project Area or surrounds and does not include a Cultural Values Assessment that traditionally incorporates significant consultation with the broader Kabi Kabi community.

Note: The GPS data presented in this report in both tables and maps are bound by the limitations of GPS accuracy, which can be within three to five metres. Additionally, small differences in map scale, polygon scales, and the inherent limitations of representing a spherical surface as a flat map, can amount to map data not corresponding exactly to on-the-ground features. Maps are thus provided for reference and cannot be used to substitute for a professional survey.

2 CONTEXTUAL BACKGROUND

This Section provides the results of database searches, reviews of previous studies, an overview of the contextual background for the project area, and reviews of historic aerial photographs.

2.1 Results of Aboriginal Cultural Heritage Search

A search of the Aboriginal Cultural Heritage Register maintained by DWATSIPM covering the Project Area and an additional 1000m buffer was undertaken on 23rd April (Figure 2; see Appendix B for full search report).

The results show that there no registered places within or immediately adjacent the Project Area however, a search with a 5000m buffer identified 17 Aboriginal cultural heritage places in the wider area, including artefacts in scatters and isolates, culturally modified trees, Aboriginal intangible places, earthen arrangements, and shell middens.

Any additional Aboriginal Cultural Heritage which may exist within the search area is protected under the Aboriginal Cultural Heritage Act 2003 even if DWATSIPM have no records relating to it.

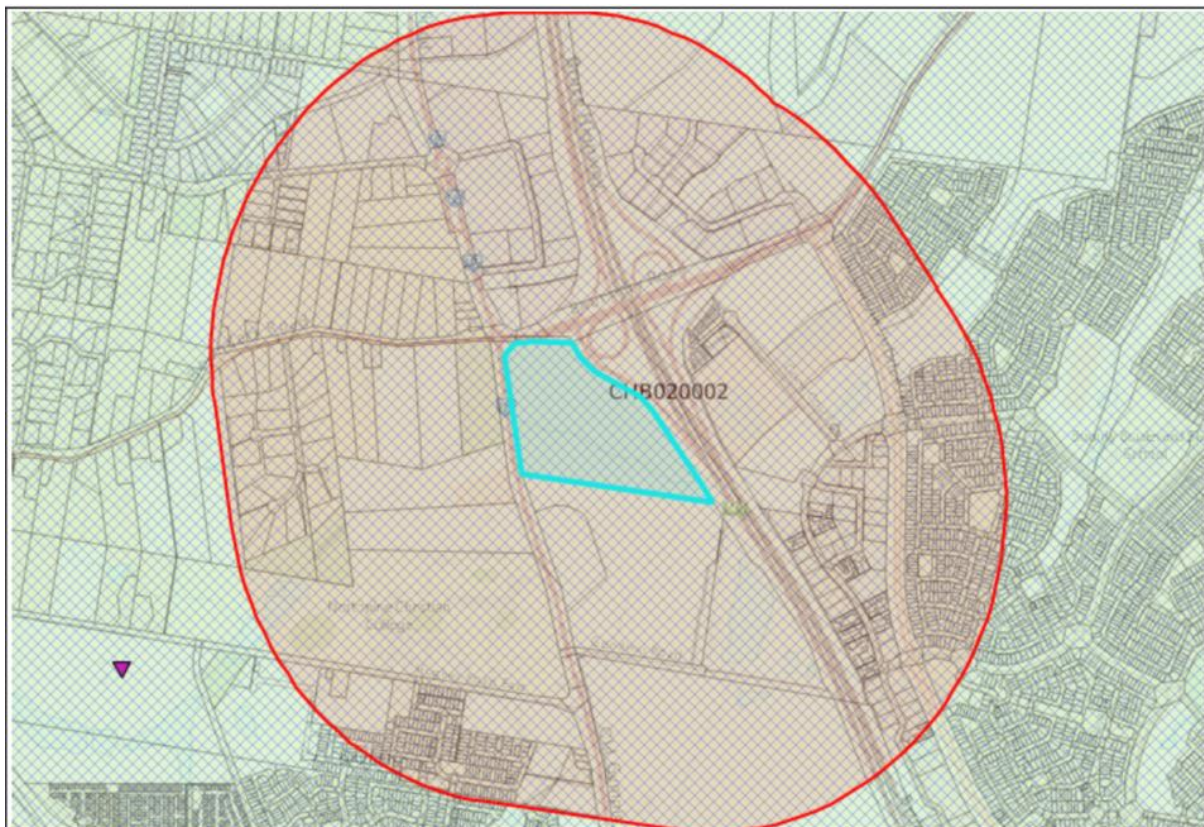


Figure 2: Results of the DWATSIPM search conducted with a 1000m buffer (Courtesy DWATSIPM; Appendix B). Interior Blue Polygon represents the Project Area.

2.2 Results of Environmental Searches

An understanding of geology and flora habitats provides important information about potential food and fibre resources available to Aboriginal people in the present and in the immediate 'historical' past. Extant vegetation, its structure and condition can provide indicators of the integrity of the ground surface. By looking at aspects of the bush land and the presence or absence of certain plant and grass species susceptible to ploughing disturbance, it can be determined whether an environment has been modified, and to what degree. This is important for developing an objective idea of what the environment and ecosystem would have been like before the impacts of European settlement.

Regional ecosystems are broad scale vegetation communities in a bioregion that are consistently associated with a particular combination of geology, landform, and soil (Sattler and Williams 1999, *Vegetation Management Act 1999*). The use of bioregions can be used to "establish guidelines for obtaining informative archaeological survey results, and research and management objectives within the region" (Smith and Rowland 1991 see also, Rowland et al. 1994).

In part, the rationale for using such regions was that "if the natural environment of each area is reflected in the range of material remains that are left at archaeological sites it is a logical step to use the boundaries of these areas as 'management zones' or areas in which the archaeology may be assessed in a regional context, rather than on a Statewide basis" (Johnston and Rowland 1987:13).

Thus, if landforms are stable, it suggests there is a high potential for the survival of archaeological sites; conversely, the potential for locating sites in unstable landforms may not be as high. Furthermore, landforms and regional ecosystems can be used as a foundation for predicting a particular landscape's archaeological sensitivity or identifying possible biases in the recording of sites or sample sizes. Similarly, estimations of the availability of potential resources available traditionally allow inferences to be made regarding what and where traditional activities may have occurred. Extant vegetation, its structure and condition also provide indicators of the integrity of the ground surface.

2.2.1 REDD search Results

The Regional Ecosystem Description Database (REDD) supersedes the regional ecosystem descriptions in Sattler and Williams (1999) and provides updated descriptions to improve clarity. It also includes additional regional ecosystems and vegetation communities that have been recognised since 1999. The Queensland Herbarium has developed a methodology for mapping regional ecosystems across Queensland which is available as a searchable layer through Queensland Globe. Searches of the REDD database and associated mapping were undertaken to identify the relevant regional ecosystem for the Project Area.

Under the 'Regional Ecosystem Framework,' each regional ecosystem is given a three-part numerical code, e.g., '12.11.3' to describe the bioregion, land zone, and vegetation. There are three aspects of the code:

1. The first part of the code refers to the bioregions and represents the primary level of biodiversity classification in Queensland. There are 13 recognised bioregions in Queensland.

2. The second part of the code refers to the land zone that the regional ecosystem occurs on. The land zone is a simplified geology/substrate-landform classification for Queensland.
3. The third part of the code is the ecosystem number and denotes different vegetation. Plant names follow the current Census of Queensland Flora.

The REDD search shows that there is remnant vegetation adjacent to the Project Area and within most of the Project Lot. However, the Project Area is classified as non-remnant as it has been cleared previously. Based on current design concepts remnant vegetation will be impacted by the road access, and by the sewer line if the on-site self-contained sewerage management option is rejected. It is noted that Koalas are a significant species to Kabi Kabi people and both the proposed road access and sewer line pass through Core Koala Habitat areas and are adjacent to essential habitat areas (see Figure 4).

Pre-clearing mapping indicates that the Project Area and surrounding landscape comprised open forest dominated by Broad Leafed Paperbark (Figure 5). *Melaleuca* species were used for a myriad of Traditional purposes in South-East Queensland, including in medicine, huts, and canoes, and was often carried with a group if it was known that paperbark wasn't available at the destination (Greenwood et al. 2025). The Project Area is also adjacent to Saltwater Creek, which ultimately extends to the coastline and would have been a useful source of fresh water. Basalt is a potential stone resource in the region used for tools such as ground edge axes, and may have been used in the area if outcrops were exposed.

Historic clearing and development would have negatively impacted items of Aboriginal Cultural Heritage including for example, the destruction of culturally modified (scarred) trees and earthen and stone arrangements. Conversely, stone artefacts despite being redistributed, buried, and/or uncovered and thus, no longer in situ would not have been destroyed. This has implications for artefactual material with the potential for artefacts to be covered, and/or uncovered in areas with active or ancestral fluvial systems. Given the presence of artefacts near permanent waterways across Kabi Kabi country, there is a high probability that artefacts will be present in similar contexts. It is also noted that the area to the south of the access road has not suffered the same level of disturbance as the surrounding area and still contains uncleared remnant vegetation.

Table 1: REDD search results. See Figure 3 for Vegetation Management mapping and Figure 5 for Pre-clearing mapping

ASPECT	CODE	DESCRIPTION
Bioregion	12	Southeast Queensland
Land Zone	3	Recent Quaternary alluvial systems.
	5	Tertiary-early Quaternary loamy and sandy plains and plateaus
Vegetation	Vegetation Management	
	12.5.3	Snappy Gum (<i>Eucalyptus racemosa</i> subsp. <i>Racemosa</i>) woodland on remnant Tertiary surfaces. <i>Endangered RE.</i> Special values: This ecosystem is known to provide suitable habitat for koalas.
	Pre-Clearing	

ASPECT	CODE	DESCRIPTION
	12.3.5	Broad Leafed Paperbark (<i>Melaleuca quinquenervia</i>) open forest on coastal alluvium. <i>Least Concern RE.</i> Special values: This ecosystem is known to provide suitable habitat for koalas
	12.3.6	Broad Leafed Paperbark (<i>Melaleuca quinquenervia</i>) +/- Forest Red Gum or Blue Gum (<i>Eucalyptus tereticornis</i>), Swamp Mahogany (<i>Lophostemon suaveolens</i>), Pink Bloodwood (<i>Corymbia intermedia</i>) open forest on coastal alluvial plains. <i>Least Concern RE.</i> Special values: Threatened fauna species including the wallum froglet. This ecosystem is known to provide suitable habitat for koalas

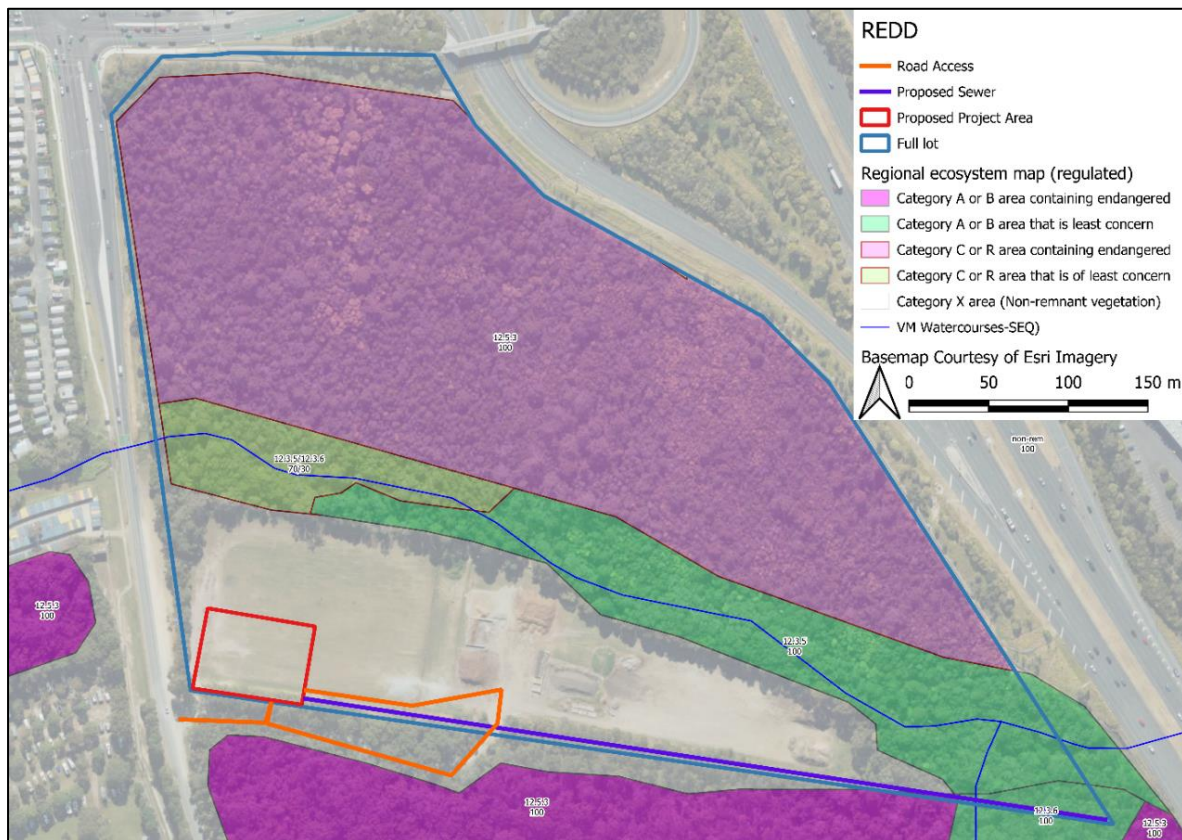


Figure 3: REDD search Results (Queensland Herbarium 2024).

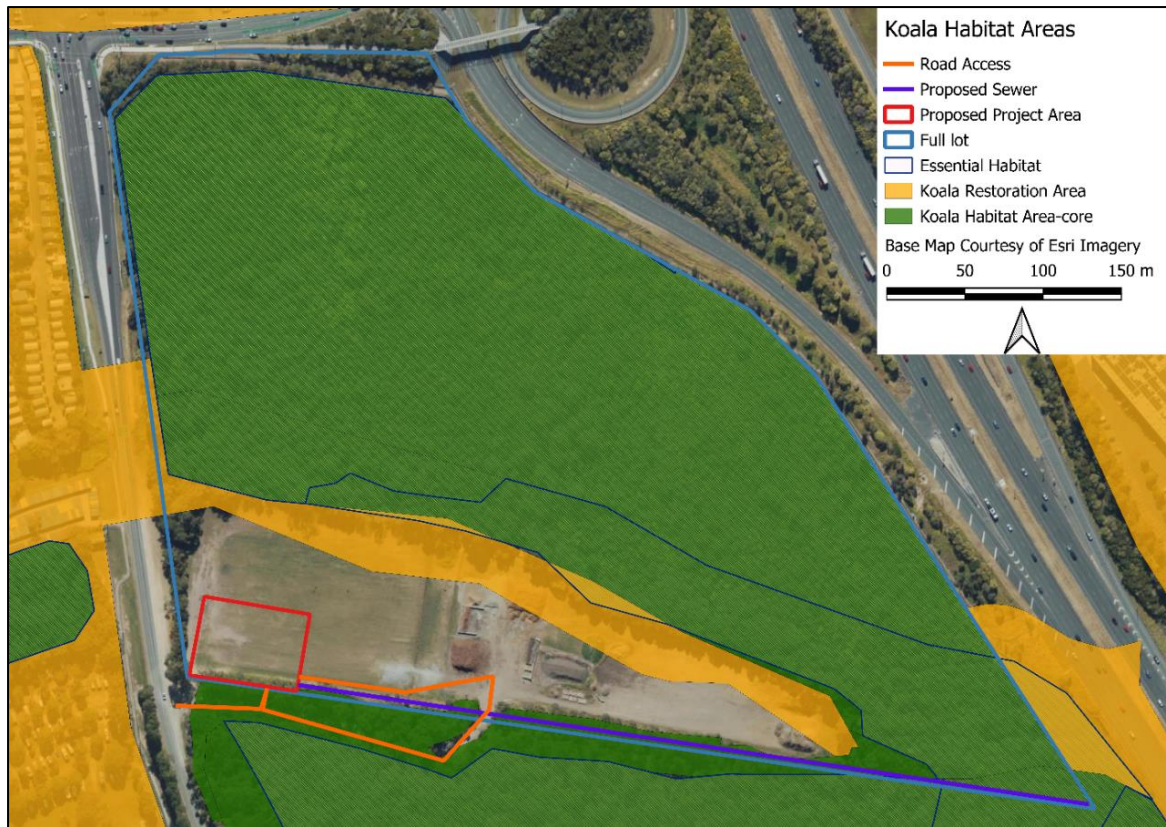


Figure 4: Koala Habitat Areas.



Figure 5: Pre-clearing remnant ecosystem map (State of Queensland (Department of the Environment, Tourism, Science and Innovation) 2024. Updated data available at <http://qldspatial.information.qld.gov.au/catalogue//>).

2.2.2 Ground Disturbance Assessment

Historic aerial imagery of the Project Area was examined to determine the extent of European land use and associated disturbance within and around the Project Area (Figures 6 and 7). Dakabin was described as a rural district until urbanisation began to expand in the 1960s and '70s (Queensland Places 2018). This is supported by aerial photography, where ground disturbance was limited during the 1950s, and had increased substantially by the 1980s, culminating in major highways and urban development by the modern day (Table 2). A Digital Elevation Model (DEM) was also used to assess ground disturbance (Figure 8).

The construction of the grassy field and access road in the Project lot would have necessitated the flattening of the area and movement of soil, as demonstrated in DEM modelling, which would have resulted in the relocation and/or burial of any potential cultural material remaining on or below the original ground surface. However, the area around the access road and to the south of the Project Area has remained consistently vegetated since at least the 1950s, indicating a lower level of disturbance and increasing the probability of in-situ material culture.

Table 2: Summary of Historical Aerial Photography.

DATE		ANALYSIS
1 Jul7 1955		Old Gympie Road is present as a narrow road. Vegetation in and around the Project Area is remnant. Some patches of agricultural development are present in the wider area and vegetation clearing for a transmission line or similar has occurred on the western side of Old Gympie Road.
1 December 1987		The Bruce Highway is now present as a multi-lane highway and Old Gympie Road has been widened and sealed. The access road extends along the southern boundary of the Project Lot from Old Gympie Road and finishes in a cul-de-sac. The Project Lot, inclusive of the development footprint is now largely a pine plantation, though a vegetation buffer has been left along Saltwater Creek, while the area south of the access road retains remnant vegetation. Further clearing and development has occurred in the surrounding area, and particularly on the west side of Old Gympie Road.
11 March 2002		The area south of Saltwater Creek, including the Project Area, has been cleared and is maintained as grassy space with a sealed square in the centre. The Project Lot north of the creek has been harvested along an access road leading south from Boundary Road, but the remainder is still vegetated. The Old Gympie Road access road is sealed, surrounded by remnant vegetation and no longer extends the length of the lot.
Contemporary Imagery (2024)	Satellite	Vegetation has completely regrown north of Saltwater Creek. The western half of the cleared area south of the creek is maintained as a grassy field, while the eastern portion has been used as council green waste storage. The north-eastern corner of the Project Lot has been reclaimed for Bruce Highway and Boundary Road slip roads and access roads. The area to the south of the Old

DATE	ANALYSIS
	Gympie Road access road still contains remnant vegetation.
Digital Elevation Model	Furrows covering the majority of the Project Area remain from the pine plantation, however cut and fill earthworks have flattened the grassy area, including the main development area of the Project Area. The cut of the access road, including parts of the old road from 1987 are visible. The impacts of the upgrades to Old Gympie Road and the Bruce Highway are also visible in the landscape.

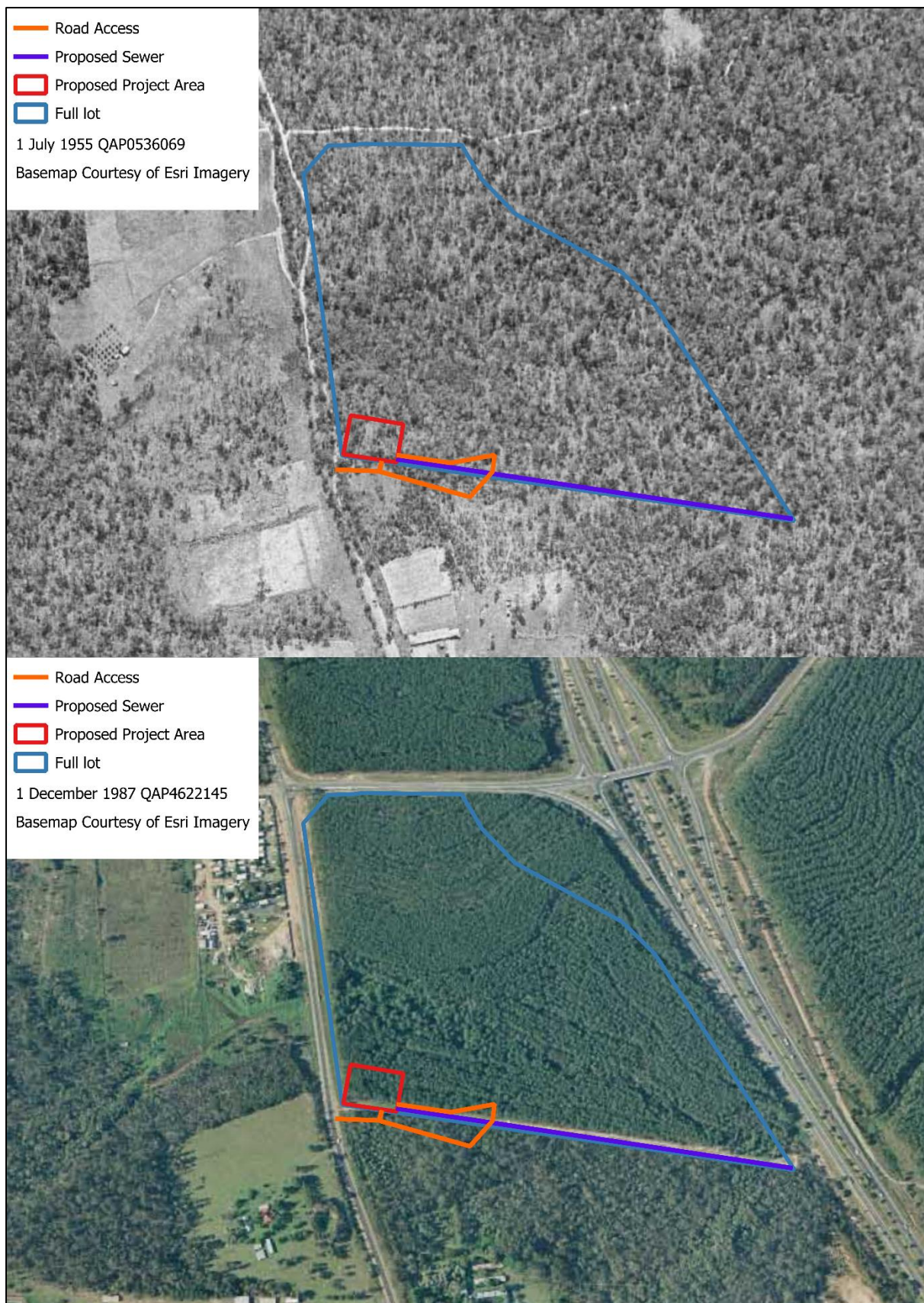


Figure 6: Historical aerial imagery used in the ground disturbance analysis -1955 & 1987 (QImagery 2024).

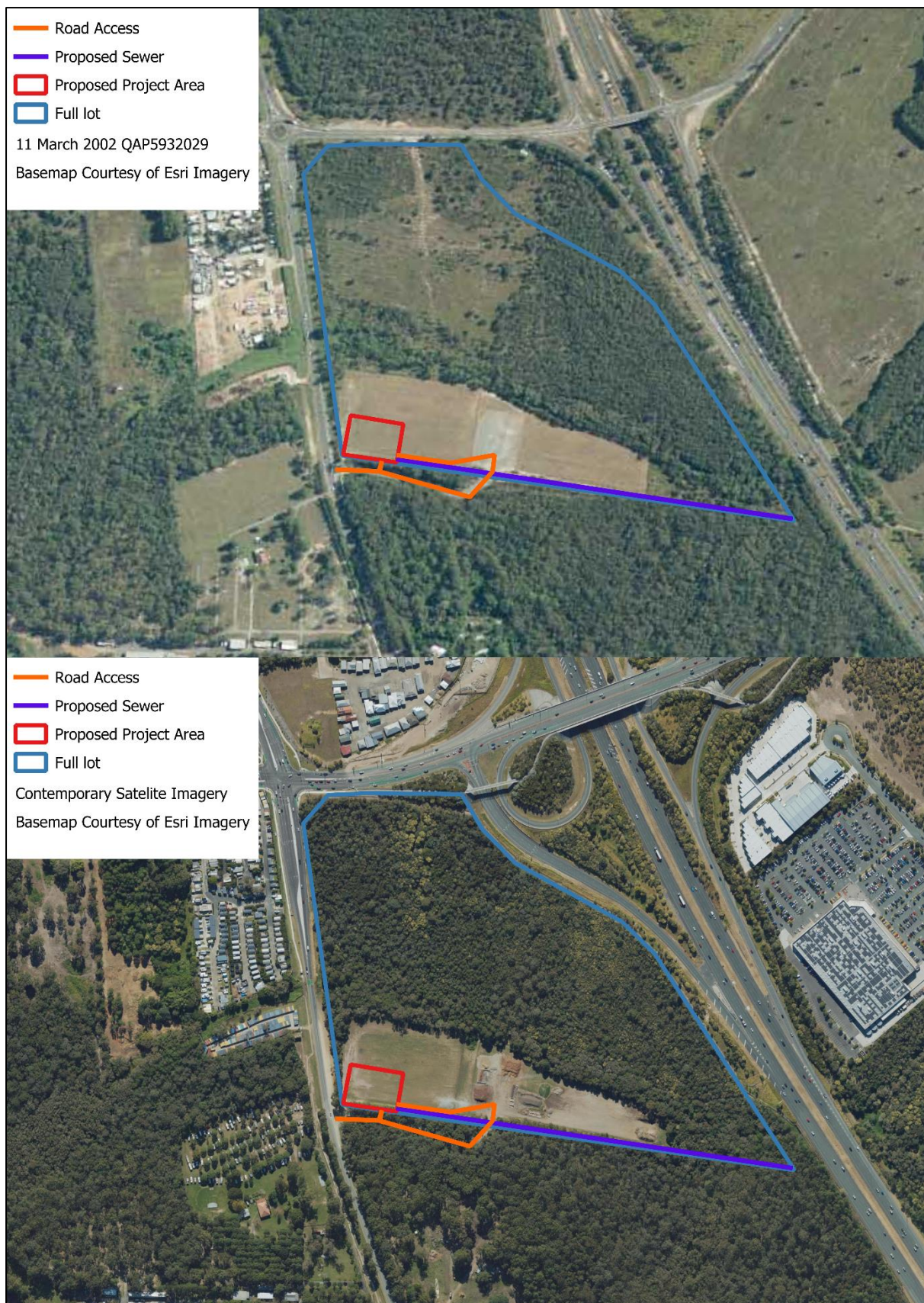


Figure 7: Historical aerial imagery used in the ground disturbance analysis -2002 & 2024 (QImagery 2024).

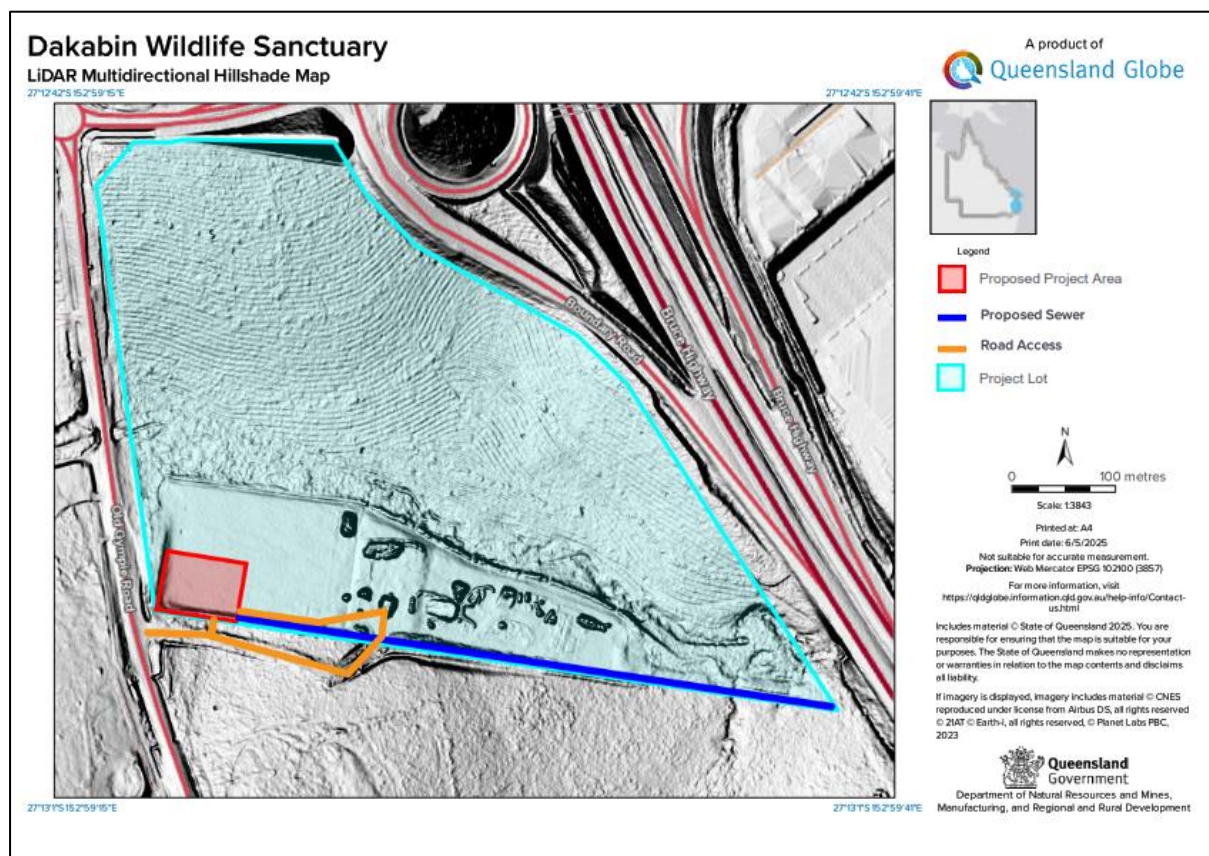


Figure 8: DEM used in the ground disturbance analysis (Queensland Globe).

2.3 Aboriginal Cultural and Archaeological Context

It is important to note that much of the cultural context reported by ethnographers and explorers was published without the knowledge or permission of the Traditional Owners. Thus, while this information can be of assistance in assessments such as this, it represents cultural appropriation and a disregard of the collective intellectual property of the Traditional Owners.

2.3.1 Kabi Kabi Cultural Context

The Kabi Kabi People inhabit a rich symbolic and ceremonial world. Their culture is dynamic and includes tangible and intangible aspects incorporating spiritual connections to country and places, physical cultural heritage, important stories, lore and traditions. It is living, dynamic and continually evolving.

Consequently, numerous landscape features in Kabi Kabi country have stories and cultural significance attached to them (e.g., see Steele 1984). Aboriginal heritage places have associated Aboriginal heritage values which embrace spirituality, lore, knowledge, practices, and traditional resources. Steele (1984) recorded that Dakabin meant 'grass-trees'.

Large social gatherings were an important feature of Aboriginal life in Southeast Queensland with groups from Southeast Queensland and Northern New South Wales coming together for major socio-economic and spiritual feasts. The Bunya nut harvest in the Bunya Mountains (*Booburrgan Ngmmunge*) was a major gathering of this type. The

Bunya pine (*Araucaria bidwillii*) is a sacred tree for the Kabi Kabi People, and the edible seeds (Bunya nuts) are a ceremonial food of great significance. The Bunya nut was eaten raw, boiled, roasted or pounded into a meal (*nyangti*). Old Gympie Road was likely a Traditional route to the Bunya Mountains (Steele 1984). Tom Petrie, travelling with an Aboriginal group, likely followed this road northwards on his journey to the Bunya festival in 1845. The party crossed the North Pine River (approximately 9km south of the Project Area) and followed the path further north before turning west to the Ranges (Steele 1984).

Culturally Modified (scarred) trees would often be used as direction markers on traditional pathways, or to identify watering holes (Kerwin 2006; Steele 1984). Bora rings are earthen circles used for ceremonial activities which attracted large gatherings of people and there is a well-known one at Kippa-Ring, approximately 13km east of the Project Area (Steele 1984:257). Another located in Petrie was used by the Logan, Amity Point, North Pine, Moreton, and Bribie Island groups (Kerkhove 2014). Waterways were also very important and both North Pine River and Caboolture River (now registered on the DWATSIPM database) were used as Traditional Pathways (Steele 1984), with what is now Old Gympie Road providing an overland link. Pathways often have culturally significant vegetation or places along their length, as well as resource areas and occupation sites.

The broader Project Area forms part of a rich cultural landscape and Kabi Kabi representatives continue to pass on traditional knowledge to the younger generations regarding geographical features in their country including sites in the vicinity of the Caboolture River to the north of the Project Area and the coastal areas to the east.

2.3.2 Review of Previous Reports and Studies

A considerable body of work has been undertaken in the wider region including a sizable corpus of consultancies by the Kabi Kabi People in conjunction with Converge and other technical advisors. This body of work (summarised below) has resulted in recording a significant number of archaeological sites across Kabi Kabi country including stone artefacts as isolates or concentrations, art, shell middens, culturally modified (scarred) trees, earthen arrangements, cultural and historic places, utilised stone resource areas (quarries), burials, and subsurface deposits.

Several investigations have been carried out in the vicinity of the Project:

- During a previous survey by CMB, a silcrete flake (stone artefact) was located within the Project Lot along the tree line of Old Gympie Road. The artefact was found with two other objects that could not be conclusively identified (Alex Wisniowiecka & Natalie Franklin Pers. Comm 2025). This is a further indication of the increased likelihood of artefacts to be present along Traditional pathways such as Old Gympie Road (see Appendix C for more details)
- At the Rocksberg residential development, which lies approximately 18km to the north-west of the Project Area, stone artefacts were recorded on the ground surface during a recent cultural heritage assessment despite significant historic disturbance associated with vegetation clearing and agriculture (Converge 2021a). Additionally, the report identified and mapped out the areas that retained cultural heritage values such as high points, the Caboolture River, the Old North Road (Aboriginal pathway), Caboolture River Road (Aboriginal pathway), ridgelines, viewsheds and remnant vegetation. This is relevant to this report as Old Gympie Road is also a known pathway which may indicate similar cultural heritage values, and it is an example of artefacts being located in a heavily disturbed area.

- Remnant vegetation often has tangible and intangible cultural significance for Kabi Kabi people. Converge has performed multiple assessments in the region where vegetation has been identified as holding cultural significance, such as habitat trees or medicine trees, even in disturbed areas. This vegetation was often nearby creeks and rivers (see Converge 2021b, 2023, 2025). The Project Area contains and is adjacent to remnant vegetation, so there is some potential for culturally significant vegetation to remain.

2.4 Conclusions

The Project Area is in a culturally rich area, nearby to a fresh water source and adjacent to a Traditional Pathway, increasing the likelihood for Aboriginal Cultural Heritage to be present, despite heavy ground disturbance, Remnant vegetation is present within the Project Area, including species with Traditional uses, and surrounding vegetation is core Koala habitat, which is a significant species to Kabi Kabi people. A large part of the Project Area has been heavily disturbed by earthworks, however multiple assessments in the region have identified material culture despite heavy disturbance, particularly in relation to Traditional pathways and waterways, both of which are adjacent to the Project Area. Thus, given the context of the Project Area, there is some possibility of material culture to be present within the Project Area even in disturbed areas and particularly in areas where less disturbance has occurred.

3 SITE INSPECTION AND RESULTS

The following section provides a description of the Project Area, the methodology employed for the cultural heritage assessment, presentation of the results of the survey and a discussion of the Project Area's cultural heritage value/archaeological potential.

3.1 Brief Description of the Project Area

The Project Area where the majority of construction is planned is located to the east of Old Gympie Road, in a cleared grassy field surrounded by fairly dense vegetation to the north and south (Figures 9 and 10). To the east of the Project Area, the cleared land comprises a council green waste site containing mulch, wood piles etc (Figure 11). The access road connects to Old Gympie Road and is also surrounded by vegetation, with a strip of trees separating it and the field. The proposed sewer line runs east adjacent to the green waste site and into the vegetation, ending around the Bruce Highway.



Figure 9: The area around the Project Area facing north-east (Converge 2025)



Figure 10: The Council green waste piles facing west (Converge 2025)



Figure 11: Access Road facing west towards Old Gympie Road (Converge 2025)



Figure 12: Vegetation along proposed sewer line (Converge 2025)

3.2 Methodology and Constraints

A pedestrian survey was conducted to assess the Project Area for both tangible and intangible Aboriginal Cultural Heritage values.

The attribution of significant Aboriginal area status to places or localities of significance based on cultural grounds was left entirely to the Kabi Kabi representatives. This report also acknowledges that all artefacts are manifestations of Aboriginal Cultural Heritage and are therefore of cultural significance, as such all finds are recorded.

In most surveys of this nature, constraints placed on the assessment relate to the physical characteristics of the landscape which are often associated with the historical use of the area and thus reflected on the ground integrity and ground surface visibility. Ground Integrity (GI) and Ground Surface Visibility (GSV) were both recorded across the Project Area to provide insight into the levels to which the landscape had been modified, and how much of the ground surface could be seen during the survey.

GSI and GSV levels were both determined using a percentage range between 0-100% i.e. Zero - 0%; Poor - 1-25%; Moderate- 26-50%; Fair - 51-75%; Good - 76-85%; Excellent 86-100% (i.e. a GSV of 0% indicates that the ground surface is completely covered, while 100% indicates that the ground surface is completely bare; a GI of 0% indicates that the landscape has been totally modified, while 100% indicates no disturbance).

3.3 Results

GSV in the Project Area was generally Zero to Poor, due to grass and leaf cover, and ground shrubbery. There were patches of Excellent GSV where the ground surface was exposed due to erosion and recent rain (Figure 13, Figure 15).



Figure 13: Grassy and exposed areas within the Project Area where the ground surface has been flattened (Converge 2025)



Figure 14: Vegetation along the southern side of the access road (Converge 2025)

GI in the Project Area is Zero-Poor as earthworks to flatten the ground, along with clearing, would have caused major surface disturbance (Figure 13). The vegetated areas were deemed Fair, as though some sections had been cleared in the past, they were not further developed, and the ground surface appeared fairly intact (Figure 12, Figure 14).

No items of material Aboriginal Cultural Heritage such as stone artefacts or culturally modified trees were identified during the survey. Field discussions first mentioned the stone artefact identified by CMB, however details of the location were supplied after the site assessment, so further identification of other potential artefacts in the field was not possible.

Ecological values are fundamentally linked with Kabi Kabi knowledge systems, cultural practices and responsibilities. Consequently, they are intrinsically linked with cultural heritage values. In addition, the Kabi Kabi People attribute cultural value to specific specimens or species, such as grandfather trees or species with retained totemic affiliations. More generally, Kabi Kabi People see mature native vegetation and important ecological zones such as watercourses and associated riparian corridors as providing important refuge and habitat for native fauna, inclusive of totemic and culturally significant species such as frog mouthed owl and koala (see Figure 4 for Koala habitat within and around the Project Area). Preservation and management of environmental values thus form part of holistic cultural heritage management.

The assessment determined that while there has been significant disturbance to the Project Area, the areas of vegetation still hold potential value. Particularly, despite historical clearing, Kabi Kabi representatives indicated that the ecosystem was still relatively intact, identifying native vine forest species present in the area (Drew Gulash pers. comm. 2025; Figure 16). There was less concern regarding the cleared space where the majority of construction will take place, as that area has been heavily disturbed in the past and the potential for any tangible Aboriginal cultural heritage to remain is low.



Figure 15: Larger trees and intact vegetation facing south towards the entrance to the access road (Converge 2025)



Figure 16: Section of bushland proposed for clearing for the access road (Converge 2025)

Discussion in the field focused on concerns regarding the construction methods of the potential sewer line and access road. While it has not been confirmed that the sewer will be built and an alignment has not been determined, Kabi Kabi representatives indicated a preference for methods involving as little disturbance as possible, such as tunnel boring, if construction goes ahead. Further, there was support for choosing a route for the access road expansion that also involved the least possible clearing. The proposed route for the access road was indicated during the assessment (Figure 16). Further Kabi Kabi representative indicated that they would like to be involved in with interpretation and education at the Hospital once construction is complete.

3.4 Discussion

While no artefacts were located during the survey, GI was generally Zero where GSV was Excellent and GSV was generally zero where GI was Fair, lowering the potential to identify cultural material on the surface. Any artefacts previously identified were unable to be located, so their proximity to the Project Area is unknown. The survey was also limited to the Project Area, which is not fully representative of the general area.

The results of the desktop assessment highlight the cultural significance of the Project Area and identify it as part of an ecologically rich and culturally significant landscape that existed traditionally and continues to do so today. This is clearly demonstrated by the range of items of cultural heritage identified in previous studies and the ongoing connections the Kabi Kabi People have to their Country. The proximity the area has to a Traditional Pathway and its value as a habitat area for native fauna such as the koala, solidify its importance as an ecological and cultural place.

While a single artefact has been reported, it is unlikely that items of Aboriginal Cultural Heritage e.g. stone artefacts will be present in the majority of the Project Area due to the disturbed nature of the cleared space and the construction of the road access. However, there is a higher likelihood of cultural materials to be present in the less disturbed areas where the expansion of the road access is proposed, as well as the potential sewer line, and any other vegetated areas that may be disturbed due to project works.

4 RECOMMENDATIONS

This Section presents recommendations developed to manage the potential impacts on the cultural heritage values identified in this report.

4.1 Statement of Cultural Impact

As noted in the desktop review, the wider landscape retains high cultural significance for the Kabi Kabi People. The Kabi Kabi People's view is that the cultural values of the landscape must be maintained, therefore Project works should be as much as necessary and as little as possible. Crucially, the Kabi Kabi People have indicated that in all cases the number one option for management of their cultural heritage is avoidance and leaving cultural material in situ, in context and 'on country'. Though there remains a low probability for the presence of material cultural items, CMB should ensure that appropriate management strategies are implemented to fully meet its duty of care under the *Aboriginal Cultural Heritage Act 2003*.

The management of "Country" and significant cultural values within it ('Caring for Country') is a traditional responsibility for the Kabi Kabi people and includes both tangible (environmental) and intangible (transmigration or spiritual) aspects.

4.2 Recommendations

4.2.1 Recommendation 1: Ongoing Negotiation

The Project Area is situated in an environmentally diverse and culturally significant part of Kabi Kabi Country. As per the above statement, Kabi Kabi people have a cultural responsibility to Care for Country and as such it is fundamentally important that CMB utilises best endeavours to ensure that the Kabi Kabi people are suitably informed regarding any potential impacts on Country and their cultural heritage that may result from the Project such that they can provide fully informed input into the design and delivery of the Project. The following should form a key component of these negotiations:

- That the Avoidance Principle be implemented as the preferred management option for all identified Aboriginal Cultural Heritage values. For clarity, the Avoidance Principle means the the abandonment, relocation and/or modification of Project activities wherever practical and feasible to facilitate the in-situ retention and protection of identified Aboriginal Cultural Heritage and associated values.
- The proponent consult with the Kabi Kabi People regarding which native vegetation species should be planted during any landscaping/regeneration works undertaken for the development, noting that the Kabi Kabi preference is for species that are locally endemic to the area be planted.

4.2.2 Recommendation 2: Monitoring of Ground Disturbance Works

There is low potential for cultural material to be present below the present ground surface due to previous earthworks in the majority of the Project Area and therefore monitoring is not required within the grassy where the majority of construction will take place. Regardless, due diligence should still apply, including a new finds process and inductions. However, Kabi Kabi representatives have requested to be present during any excavations

within all vegetated areas, in order to monitor disturbance levels where they impact on levels at or below the natural ground surface and identify any possible cultural heritage material. It is recommended that the parties collaboratively develop a program of systematic ground disturbance monitoring during the excavations to accommodate this.

4.2.3 Recommendation 3: Avoiding Impacts on Mature Vegetation

Large/old growth native trees retain both tangible and intangible cultural values for the Kabi Kabi People and as part of 'Caring for Country' their preference is that such trees are retained in situ in any development. As such the removal of native trees within the Project Area should be avoided. The preference for the Kabi Kabi People is that the Project Works should aim to use non-invasive methods where possible, e.g. tunnel boring along the potential sewer line, to reduce the need for clearing vegetation. Where the road access needs to be expanded, a path of least resistance should be chosen to minimise the impact on vegetation.

In the event that avoidance is no longer determined to be achievable, then CMB must reasonably demonstrate that there are no practical or feasible alternatives to the removal of the trees within the context of the Project and the Kabi Kabi People reserve the right to have this independently verified at the proponent's cost. If agreement is reached that the tree or trees in question need to be removed, then the parties should discuss and agree on related management matters inclusive of but not limited to:

1. Offsetting these trees with plantings of equivalent species in adjacent areas.
2. Reusing timber for terrestrial and other habitat in adjacent areas.
3. Installing nesting boxes and hollows in adjacent areas.
4. Improving the habitat values of the riparian corridor/ green zone.

4.2.4 Recommendation 4: Cultural Heritage Inductions

Cultural Heritage Inductions for all on-site construction personnel are to be developed in conjunction with and presented where practical by Kabi Kabi representatives. Additionally, contractor/s should include a Kabi Kabi approved cultural heritage component in their site inductions for the life of the Project.

4.2.5 Recommendation 5: New Finds Process

The potential for cultural material is low within the cleared areas, and higher within vegetated areas as evidenced by the artefact found by CMB. As such due diligence is recommended, even in disturbed areas. CMB should work collaboratively with the Kabi Kabi People to develop and implement an agreed procedure for incidental finds of cultural heritage during Project activities. An essential component of this process at the outset should be the management of any such finds for the duration of project works and include a confirmed post works keeping place which is commonly "on country."

Any potential Aboriginal Cultural Heritage material identified should be recorded and assessed in situ by an appropriately qualified cultural heritage practitioner and management strategies developed in negotiation with the Kabi Kabi People. Work can continue elsewhere provided it does not impact on the potential cultural heritage. Work at that particular location where the potential cultural heritage was identified should not recommence until written approval has been provided by the Kabi Kabi People.

Note: if items of cultural heritage are located, they may trigger the development and implementation of additional management requirements. These additional requirements may include, but are not restricted to, further mechanical excavations, detailed mapping and recording, establishment of exclusion zones to leave items/features in situ, and ground disturbance monitoring.

4.2.6 Recommendation 6: On Country Keeping Place

The Kabi Kabi position is that all recovered artefacts be kept 'on country.' Therefore, it is recommended that suitable long term storage solutions form part of the ongoing negotiations between the parties.

Kabi Kabi representatives have recommended the southern side of the access road as a potential area for a keeping place, noting that it will not be impacted by current works.

Note: the agreed strategy must include short term storage and management solutions for artefacts recovered during the course of the Project and prior to their accession to a final Keeping Place.

As a guide, all artefacts recovered during works should be reburied in a permanent 'Keeping Place', within the bounds of the Project Area in a location which will not be impacted by any potential future works. The reburial location should be lodged with DWATSIPM. The record of the reburial location should be incorporated into CMB's internal database as a 'No-go zone' for the length of the Project, to ensure its long-term protection.

4.2.7 Recommendation 7: Public Art and Interpretation

Kabi Kabi representatives have indicated that they would like interpretive Kabi Kabi design elements to be included in the hospital building, including interpretive signage, for example culturally appropriate educational information about the animals which would have inhabited the local area such as Koalas etc. and information about Kabi Kabi relationship to Country. The Kabi Kabi people would also like to opportunity to participate in educational programs for the community groups that will use/visit the facilities, such as school children, wildlife researchers and the general public. The Kabi Kabi People reserve copyright over all Kabi Kabi intellectual property.

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APPENDIX A: LOCALITY PLAN



Figure 17 Locality Plan provided by CMB. The approximate main hospital location is circled in red.

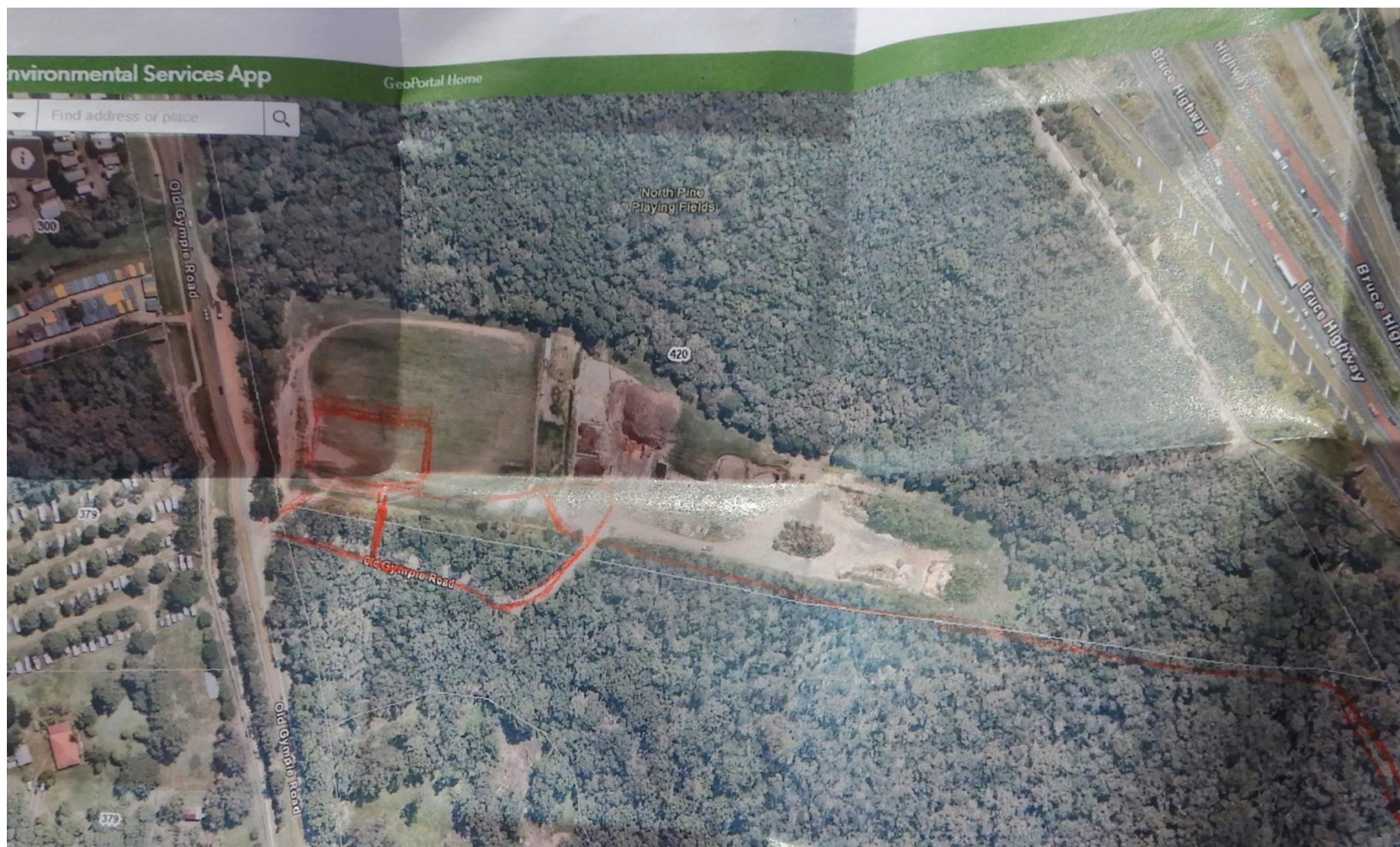


Figure 18 Rough outline of works drawn during site assessment Courtesy of CMB (Converge 2025, image contrast adjusted for clarity)

APPENDIX B: DWATSIPM SEARCH RESULTS

Cultural Heritage Database and Register Search Report

Search report reference number: 184558

The Aboriginal and Torres Strait Islander Cultural Heritage Database (cultural heritage database) and Aboriginal and Torres Strait Islander Cultural Heritage Register (cultural heritage register) have been searched in accordance with the location description provided, and the results are set out in this report.

The cultural heritage database is intended to be a research and planning tool to help Aboriginal and Torres Strait Islander parties, researchers, and other persons in their consideration of the cultural heritage values of particular areas.

The cultural heritage register is intended to be a depository for information for consideration for land use and land use planning, and a research and planning tool to help people in their consideration of the Aboriginal cultural heritage values of particular objects and areas.

Aboriginal or Torres Strait Islander cultural heritage which may exist within the search area is protected under the [Aboriginal Cultural Heritage Act 2003](#) and the [Torres Strait Islander Cultural Heritage Act 2003](#) (the Cultural Heritage Acts), even if the Department of Seniors, Disability Services and Aboriginal and Torres Strait Islander Partnerships (the Department) has no records relating to it.

The placing of information on the database is not intended to be conclusive about whether the information is up-to-date, comprehensive or otherwise accurate.

Under the Cultural Heritage Acts, a person carrying out an activity must take all reasonable and practicable measures to ensure the activity does not harm Aboriginal or Torres Strait Islander cultural heritage. This applies whether or not such places are recorded in an official register and whether or not they are located on private land.

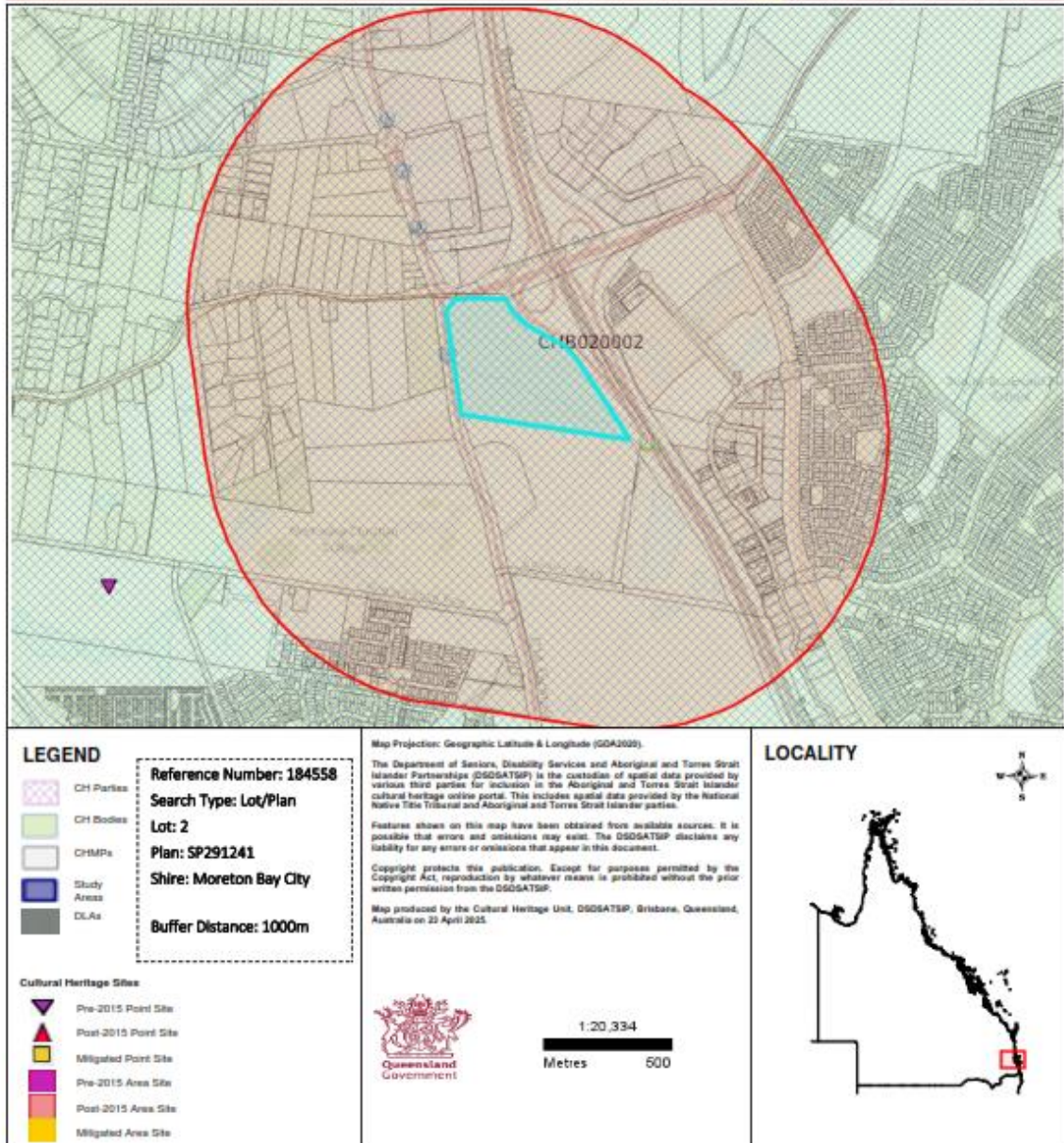
Please refer to the Department website <https://www.qld.gov.au/firstnations/environment-land-use-native-title/cultural-heritage/cultural-heritage-duty-of-care> to obtain a copy of the gazetted Cultural Heritage Duty of Care Guidelines, which set out reasonable and practicable measure for meeting the cultural heritage duty of care.

In order to meet your duty of care, any land-use activity within the vicinity of recorded cultural heritage should not proceed without the agreement of the Aboriginal or Torres Strait Islander Party for the area, or by developing a Cultural Heritage Management Plan under Part 7 of the Cultural Heritage Acts.

The extent to which the person has complied with Cultural Heritage Duty of Care Guidelines and the extent the person consulted Aboriginal or Torres Strait Islander Parties about carrying out the activity – and the results of the consultation – are factors a court may consider when determining if a land user has complied with the cultural heritage duty of care.

Should you have any further queries, please do not hesitate to contact the department via email: cultural.heritage@dsdsatsip.qld.gov.au or telephone: 1300 378 401.

Cultural Heritage Database and Register Search Report



Cultural Heritage Database and Register Search Report

There are no Aboriginal or Torres Strait Islander cultural heritage site points recorded in your specific search area.

There are no Aboriginal or Torres Strait Islander cultural heritage site polygons recorded in your specific search area.

Cultural Heritage Party/ies for the area:

Reference No.	Federal Court No.	Name	Contact Details
	QUD20/2019	Kabi Kabi First Nation Traditional Owners Native Title Claim Group	Kabi Kabi First Nation Traditional Owners P & E Law PO Box 841 MAROOCHYDORE QLD 4558 Phone (07) 5479 0155 Email: reception@paelaw.com Contact: Matt Patterson

Cultural Heritage Body/ies for the area:

Departmental Reference No.	Name	Contact Details	Registration Date
CHB020002	Kabi Kabi People Aboriginal Corporation	Kabi Kabi Peoples Aboriginal Corporation PO Box 713 CALOUNDRA QLD 4551 Mobile: 0435 599 859 Email: b.warner@outlook.com	27/07/2021

There are no Cultural Heritage Management Plans recorded in your specific search area.

There are no Designated Landscape Areas (DLA) recorded in your specific search area.

There are no Registered Cultural Heritage Study Areas recorded in your specific search area.

There are no National Heritage Areas (Indigenous values) recorded in your specific search area.

Cultural Heritage Database and Register Search Report

Glossary

Cultural Heritage Body: An entity registered under Part 4 of the Cultural Heritage Acts as an Aboriginal or Torres Strait Islander cultural heritage body for an area. The purpose of a cultural heritage body is to:

- identify the Aboriginal or Torres Strait Islander parties for an area
- serve as the first point of contact for cultural heritage matters.

Cultural Heritage Management Plan (CHMP): An agreement between a land user (sponsor) and Traditional Owners (endorsed party) developed under Part 7 of the Cultural Heritage Acts. The CHMP explains how land use activities can be managed to avoid or minimise harm to Aboriginal or Torres Strait Islander cultural heritage.

Cultural Heritage Party: Refers to a native title party for an area. A native title party is defined as:

- Registered native title holders (where native title has been recognised by the Federal Court of Australia).
- Registered native title claimants (whose native title claims are currently before the Federal Court of Australia).
- Previously registered native title claimants (the 'last claim standing') are native title claims that are no longer active and have been removed from the Register of Native Title Claims administered by the National Native Title Tribunal. Previously registered native title claimants will continue to be the native title party for that area providing:
 - o there is no other registered native title claimant for the area; and
 - o there is not, and never has been, a registered native title holder for the area.

The native title party maintains this status within the external boundaries of the claim even if native title has been extinguished.

Cultural heritage site points (pre 2015): Aboriginal and Torres Strait Islander cultural heritage sites and places recorded in the database as point data **before** 1 July 2015.

Cultural heritage site points (post 2015): Aboriginal and Torres Strait Islander cultural heritage sites and places recorded in the database as point data **after** 1 July 2015.

Cultural heritage site points (post 2015 mitigated): Aboriginal and Torres Strait Islander cultural heritage sites and places recorded in the database as point data after 1 July 2015 where the recorder has advised the department that the site has been mitigated.

Cultural heritage site polygons: Aboriginal and Torres Strait Islander cultural heritage sites and places recorded in the database as a polygon.

Designated Landscape Areas (DLA): Under the repealed *Cultural Record (Landscapes Queensland and Queensland Estate) Act 1987*, an area was declared a 'designated landscape area' (DLA) if it was deemed necessary or desirable for it to be preserved or to regulate access.

Indigenous Protected Areas (IPA): Areas of land and sea managed by Indigenous groups as protected areas for biodiversity conservation through voluntary agreements with the Australian Government. For further information about IPAs visit <https://www.environment.gov.au/land/indigenous-protected-areas>

National Heritage areas: Places listed on the National Heritage List for their outstanding heritage significance to Australia and are protected under the *Environment Protection and Biodiversity Conservation Act 1999*. For further information about the National Heritage List visit <https://www.environment.gov.au/heritage/about/national>

National Heritage Areas (Indigenous values): Places listed on the National Heritage list (Indigenous values) are recognised for their outstanding Indigenous cultural heritage significance to Australia and are protected under the *Environment Protection and Biodiversity Conservation Act 1999*. These areas are now included in the cultural heritage

Cultural Heritage Database and Register Search Report

register.

Registered Cultural Heritage Study Areas: Comprehensive studies of Aboriginal and or Torres Strait Islander cultural heritage in an area conducted under Part 6 of the Cultural Heritage Acts for the purpose of recording the findings of the study on the register.

Traditional Use of Marine Resources Agreement (TUMRA): Areas subject to agreement between Great Barrier Reef Traditional Owners and the Australian and Queensland governments on the management of traditional use activities on their sea country. For further information about TUMRAs visit <https://www.gbrmpa.gov.au/our-partners/traditional-owners/traditional-use-of-marine-resources-agreements>

World Heritage Areas: Places inscribed on the World Heritage List pursuant to the World Heritage Convention adopted by the United Nations Education, Scientific and Cultural Organisation (UNESCO) and are protected under the [Environment Protection and Biodiversity Conservation Act 1999](#). For further information about World Heritage places in Queensland visit <https://parks.des.qld.gov.au/management/managed-areas/world-heritage-areas>

Disclaimer: *The Department of Seniors, Disability Services and Aboriginal and Torres Strait Islander Partnerships is the custodian of spatial data and information provided by various third parties for inclusion in the Aboriginal and Torres Strait Islander cultural heritage online portal. This includes spatial data provided by the National Native Title Tribunal and Aboriginal and Torres Strait Islander parties. Department of Seniors, Disability Services and Aboriginal and Torres Strait Islander Partnerships is not responsible for the accuracy of information provided by third parties or any errors in this search report arising from such information.*

APPENDIX C: ARTEFACT DETAILS

Artefact Co-ordinates:

E498841

N6989773

Zone 56.



Figure 19 Location of previously located artefact in relation to the current Project Area and Old Gympie Road



Figure 20 Stone Artefact located by CMB (Alex Wisniowiecka pers. comm. 2025)