Exhumation Management Plan

SM ES-PW-315/1.0

Sydney Metro Integrated Management System (IMS)

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<th>Sydney Metro City &amp; Southwest</th>
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1. Introduction

Artefact Heritage have been engaged by Transport for New South Wales (TfNSW) to develop a Exhumation Management Plan (EMP) to provide TfNSW and their contractors with guidance on managing the discovery of human skeletal remains during the course of the Sydney Metro City & Southwest (the project). The project would involve construction and operation of a 15.5 km underground rail line, and new stations between Chatswood and Sydenham (Figure 1). As a Critical State Significant Infrastructure (CSSI) project, it is subject to assessment and approval by the Minister for Planning and Environment under Section 115ZB of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act).

The Conditions of Approval (CoA) relevant to this document are E26 and E27.

- CoA E26 states:
  
  *This approval does not allowed the Proponent to harm, modify, or otherwise impact human remains uncovered during the construction and operation of the CSSI, except in accordance with the Exhumation Management Plan (Condition E27)*

- CoA E27 states:
  
  *An Exhumation Management Plan must be prepared to guide the relocation of recovered human remains. The Exhumation Management Plan must be prepared:*
  
  (a) in consultation with, and meeting the requirements of, the OEH and NSW Health; and

  (b) in accordance with the Guidelines for Management of Human Skeletal Remains (NSW Heritage Office, 1998b) and NSW Health Policy Directive – Exhumation of human remains (December, 2013), and other relevant guidelines and standards prepared by the Heritage Council of NSW or OEH.

  *The Exhumation Management Plan must be provided to the Secretary for information before the commencement of excavation works.*

  *Note: Human remains that are found unexpectedly during works are under the jurisdiction of the NSW State Coroner and must be reported to the NSW Police immediately.*

The purpose of this EMP is therefore to address CoA E27 to fulfil CoA E26 where required, by providing a clear and concise process to follow in the event of discovery of potential human remains during project works. The policy document may be used for the entire project (including Central Walk), although there is a focus on the potential remains at Central Station (former Devonshire Street cemetery) which have been identified in the Archaeological Research Design (ARD) (Artefact Heritage, 2016). This EMP focuses on non-Aboriginal remains specifically, although the process for differentiating Aboriginal and non-Aboriginal remains is included.
1.1. Methodology

This EMP is submitted as a two-stage plan. Stage 1 (this document) satisfies the requirements CoA E27, outlining the procedure for the discovery and management of human remains within the Sydney Metro project area. Specific tasks for Stage 1 are as follows:

- Archaeological methodology for excavation of remains including processes for appropriately handling remains in accordance with the relevant guidelines.
- Preparation of a flow chart process to be used by contractors to respond to the discovery of suspected human remains.

Stage 2 will outline post-exhumation management primarily around relocation, processing and long-term arrangements. This stage will include the nomination of a physical anthropologist and temporary storage location, process for additional analysis including DNA testing, isotope analysis and environmental sampling, and discussion on requirements for public involvement.

Figure 1: Project overview and station locations
1.2. Brief historical overview: Devonshire Street cemetery (Central Station)

The northern part of the Central Station site was occupied by the former nineteenth century Devonshire Street cemetery, specifically the Church of England, Presbyterian, Wesleyan and Roman Catholic burial areas. The burial grounds, called the Sandhills Cemetery or the Devonshire Street Cemetery, was consecrated in 1820\(^1\). The site was chosen due to the remote location of the cemetery compared to the growing town of Sydney. The cemetery was declared at capacity, and took no more burials from 1865 onwards. Images from the 1890s, shortly before the cemetery was resumed for the expansion of the station, show that the original brick walls for the burial ground were still intact\(^2\).

Proposals had been raised in the 1880s and 1890s for the construction of a larger station facility at Central Station was adopted and the clearing of the Devonshire Street cemetery commenced in 1901. On the 17 January 1901, the government issued a notice declaring that representatives of any deceased in the cemetery must remove their relatives within two months\(^3\). By 1902 clearing had been completed.

\begin{center}
\textbf{Figure 2}: 1848 plan of proposed Central railway station with Devonshire Street cemetery marked as ‘Burial Grounds’ and the current station footprint indicated by the blue line\(^4\)
\end{center}

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\(^1\) The Sydney Gazette and New South Wales Advertiser, 5 February 1820.  
\(^3\) The Sydney Morning Herald, 25 January 1901.  
\(^4\) Source: State Records NSW, SR Map 6408 with overlay by Artefact Heritage 2016.
1.3. Archaeological potential of former Devonshire Street cemetery, Central Station

Artefact Heritage prepared an historical ARD for the project to assess archaeological potential and recommend appropriate management and mitigation measures. Central Station was assessed as having low potential for State significant archaeological remains associated with Devonshire Street cemetery as follows:

The Devonshire Street cemetery was located in the northern half of the Central Station site. Remaining material from the cemetery could include structural remains such as former footings for the deconstructed burial ground walls, residual brick and stone tombs, and tombstones. Coffins, coffin furniture and human skeletal remains and associated artefacts may also be preserved. Evidence of grave excavation in the form of cut soils and potential clay and sand backfill would be located from the base of the grave shaft to the top of the former ground level.\(^6\)

As potential for human skeletal and burial-related remains cannot be ruled out entirely, recommended mitigation measures include archaeological monitoring of all ground disturbance and bulk excavation within the former Devonshire Street cemetery (Sites CS 2 and CS 3) and archaeological testing in Site C3 once the top of the sand layers is exposed during bulk excavation. This EMP applies if human skeletal remains or burial-related archaeological material is identified.\(^7\)

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\(^5\) Source: State Library of New South Wales

\(^6\) Artefact Heritage 2016: 238.

\(^7\) Ibid, pp.255-257
1.4. Overview of legislative requirements for dealing with human remains

The following section provides an overview of the various legislation that would apply to the discovery, management and relocation of human remains. A discovery of suspected human remains may be subject to different Acts and requirements, thereby triggering different notification pathways, based on the specific circumstances involved.

Whilst the first step will always be to notify NSW Police, further confirmation of the age (antiquity) and nature of the skeletal remains as well as the reasons for the disturbance will dictate which Act and provisions will be enacted.

The Procedure for the Discovery, Management and Relocation of Human Remains and flowchart follows this section.

Although approval under the Heritage Act 1977 and the National Parks and Wildlife Act 1973, is not required for a CSSI project, notification to the Heritage Council under s146 of the Heritage Act, and notification of an Aboriginal object under the National Parks and Wildlife Act is still required for discovery of archaeological human remains. The provisions of the Coroners Act 2009 and Public Health Regulation 2012 apply under a CSSI approval. Compliance with this legislation would be fulfilled through adhering to the processes outlined in this plan.

1.5. Discovery of human remains and forensic cases: Coroners Act 2009 (NSW)

A discovery of suspected human remains less than 100 years old is a forensic case by definition and the remains would come under the jurisdiction of the State Coroner and the Coroners Act 2009 (NSW). Such a case would be considered a ‘reportable death’ and under legal notification obligations set out in s35 (2); a person must report the death to a police officer, a coroner or an assistant coroner as soon as possible. This applies to all human remains less than 100 years old regardless of ancestry (i.e. both Aboriginal and non-Aboriginal remains).

35 Obligation to report death or suspected death

(1) This section applies to any person who has reasonable grounds to believe that a death or suspected death of another person:

(a) is a reportable death or occurred in circumstances that would be examinable under Division 2 of Part 3.2, and

(b) has not been reported in accordance with subsection (2).

(2) A person to whom this section applies must report the death or suspected death concerned to a police officer, a coroner or an assistant coroner as soon as possible after becoming aware of the grounds referred to in subsection (1).

Maximum penalty (subsection (2)): 10 penalty units.

(3) A police officer to whom a death or suspected death is reported under this section is required to report the death or suspected death to a coroner or assistant coroner as soon as possible after the report is made.

(4) An assistant coroner to whom a death or suspected death is reported under this section is required to report the death or suspected death to a coroner as soon as possible after the report is made.
A coroner to whom a death or suspected death is reported under this section is required to inform the State Coroner of the report as soon as practicable after the report is made.


The Heritage Act 1977 and Guidelines for the Management of Human Skeletal Remains under the Heritage Act 1977 apply to historic burials in New South Wales. It should be noted that the Guidelines are outdated in terms of the current statutory framework.

The definition of an archaeological 'relic' under the Heritage Act changed in 2009. A relic is no longer defined as an object of at least 50 years of age, but is now defined as an archaeological deposit, or artefact that has heritage significance at a local or State level. New guidelines Assessing Significance for Historical Archaeological Sites and 'Relics' have been endorsed by the Heritage Council and should be used to assess the level of heritage or archaeological significance of the remains. With reference to burial grounds, objects such as headstones, grave enclosures and grave goods, as well as buried human remains may be a 'relic'.

As the project is approved as CSSI, an application to NSW Heritage Council for an excavation permit (either Section 140 or Section 60) is not required. Notification to the NSW Heritage Council (or delegate) is required under the CSSI approval (E20) if relics, including human remains, are located.

The CoA address archaeology and heritage matters and, specifically, CoA E27 requires that this EMP be prepared and followed as the guiding document for the unexpected discovery of human remains.


The NPW Act, administered by the OEH, provides statutory protection for all Aboriginal 'objects' (consisting of any material evidence of the Aboriginal occupation of NSW) under Section 90 of the Act, and for 'Aboriginal Places' (areas of cultural significance to the Aboriginal community) under Section 84.

Discovery of Aboriginal burials and/or human remains is addressed in the Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared by Artefact Heritage in 2016. The report was prepared in accordance with the Environmental Impact Statement mitigation measures relevant to Aboriginal heritage (AH1 to AH6), the NSW Office of Environment and Heritage (OEH) ‘Guidelines for Aboriginal Cultural Heritage Impact Assessment and Community Consultation’\(^8\), the OEH ‘Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW’\(^9\), the OEH ‘Aboriginal cultural heritage consultation requirements for proponents 2010’\(^10\), the OEH ‘Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales’\(^11\) and the OEH ‘Aboriginal Cultural Heritage Assessment and Management Plan’\(^12\).

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\(^8\) NSW Heritage Office, 1998.

\(^9\) NSW Department of Environment and Conservation, 2005.

\(^10\) OEH 2011.

\(^11\) Department of Environment, Climate Change and Water 2010.

\(^12\) OEH 2010.
If suspected human skeletal remains are uncovered at any time during the archaeological management program, the process as outlined in this EMP and detailed in the flow chart is to be followed. Management of the remains would be guided by consultation with the nominated Registered Aboriginal Parties (RAPs) for the project, in adherence to the ACHAR.


Public Health Regulation 2012 and the NSW Health Policy Statement – Exhumation of human remains of the Public Health Regulation 2012 provides specific regulation for the exhumation of bodies in NSW.

Under Clause 70 an application for approval to exhume the remains of a dead person may be made to the Director-General via an approved form to the Director of the local Public Health Unit that acts on behalf of the Director-General of NSW Health. Exhumation not to take place unless an authorised officer or a member of staff of NSW Health is present at the exhumation (the grave may be excavated to the lid of the coffin but nothing must be disturbed until the arrival of the authorised officer) (Clause 72). An authorised officer must be present at the exhumation to ensure that the correct interment is opened, to ensure that all of the remains are exhumed and to enforce the protection of public health should this be necessary.

TfNSW would be required to apply to the Director General of NSW Department of Health for approval to exhume human remains as per Clause 26 of the Regulations.


The NSW Health Policy Statement on the exhumation of human remains provides the policy to be observed by Public Health Units located in Local Health Districts, on receipt of an application to seek permission for approval of the exhumation of human remains under the Public Health Regulation 2012. Public Health Units (PHUs) of Local Health Districts (LHDs) in NSW facilitate the approval for an exhumation.

Under Clause 69 a person must not exhume a body unless the exhumation of the remains has been approved by the Director-General. An application for permission to exhume the remains of a deceased person is to be made to the PHU on the approved form which is contained at the [NSW Health website](#).

The required form is appended to this EMP for ease of reference.

1.10. **Work Health and Safety Act 2011**

The Work Health and Safety Act 2011 provisions apply to protect personnel involved in the exhumation procedure by creating and maintaining safe and healthy work practices and are enforced by WorkCover NSW. Graves, crypts and vaults could be considered to be confined.
spaces in some circumstances under health and safety legislation. More information on safe work practices is available at or by contacting SafeWork NSW via their website or directly.

Health and safety aspects of working with human remains should be considered. Generally, working with archaeological human skeletal remains requires no extra precautions to be taken beyond normal health and safety regulations. Once any necessary site health and safety precautions have been taken, the exhumation of human remains can proceed.
2. Procedure for the discovery, management and relocation of human remains

This procedure provides project management, principal contractors and project archaeologist with advice on the steps to follow upon uncovering suspected human remains. Archaeological heritage and the potential for burials and human remains would be included in the general project induction for all personnel. The induction would include procedure as set out in this EMP.

2.1. Initial discovery of bones: What do we do?

To avoid doubt, all suspected bone must be treated as potential human skeletal remains and work around them must stop while they are protected and investigated as a matter of urgency.

1. Stop Work and preliminary notification

Upon the discovery of bone (suspected human remains), all work in the area of the find must stop and the remains must be confirmed as being human or not. Preliminary notification must be made to the NSW Police in compliance with Section 35 of the Coroners Act 2009.

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<tr>
<th>What?</th>
<th>When bones are uncovered at a site, all work in the area the find must <strong>stop immediately</strong> and the site must be secured.</th>
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<tr>
<td>Who?</td>
<td>The discoverer will <strong>immediately</strong> notify machinery operators so that no further disturbance of the remains will occur, as well as notify the foreman/site supervisor, principal contractor, project archaeologist and Sydney Metro Environmental Representative (CoA A22). Preliminary notification to the NSW Police will be undertaken by the Environmental Representative. Notification should provide verbal description of the remains and inform the police that consultation with technical specialists is being undertaken to confirm that the remains are human, as well as the burial context (archaeological or forensic, refer Step 2).</td>
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<tr>
<td>How?</td>
<td>Inform all site personnel of restricted access to the area of the discovery until further notice. Area must be fenced off (flagging or temporary exclusion fencing).</td>
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<tr>
<td>Actions</td>
<td>Notify site supervisor, principal contractor, project archaeologist / Excavation Director and Sydney Metro Environmental Representative of the find and protect the suspected remains until an initial assessment can be undertaken by a technical specialist. Preliminary notification to NSW Police.</td>
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2. Confirm human provenance

Skeletal remains could either be articulated and in a recognisable form of burial such as a coffin or common burial position of the body (e.g. supine, prone or flexed) or they could be disarticulated or fragmented remains. Within the boundaries of a known historic burial ground, there is a high probability of the remains being human. In a suspected forensic case, the remains may have clothing and/or human tissue. Disarticulated or fragmented bones are often uncovered and these may require specialist assessment to determine legal jurisdiction.

If suspected human remains are identified during the course of project works, preliminary notification must be made to the NSW Police in compliance with Section 35 of the Coroners Act 1999 (refer Step 1). NSW Police would be again be contacted immediately upon receipt of confirmation of human provenance.
What? Confirmation that the remains are human, their burial context - whether they are forensic (less than 100 years) or archaeological (older than 100 years) and suspected ancestry (Aboriginal or non-Aboriginal).

Who? Forensic or physical anthropologist, or archaeologist with specialist skills such as an osteoarchaeologist.

How? Consultation could be undertaken as either an on-site inspection or via good quality photos sent to the nominated technical specialist of 1) the remains; and 2) the site general site location of the discovery.

Actions Contact nominated technical specialists to confirm that the remains are: a) human, b) burial context (archaeological or forensic), and c) suspected ancestry (Aboriginal or non-Aboriginal). For the duration of the Sydney Metro project, the nominated technical specialists are:

- Forensic Anthropologist – TBC by contractor for project area.
- Nominated Excavation Director – TBC by contractor for project area.

The archaeologist may be able to identify the nature of remains without input from the Forensic Anthropologist. The Forensic Anthropologist should be contacted as required.

3. Notification based on jurisdiction (forensic or archaeological)

Once confirmation is received from the technical specialist that the remains are of human origin, there are three possible statutory pathways to follow based on the assessment:

- **Forensic case (remains are less than 100 years old):** If it is determined by specialist assessment (Step 2) that the remains are forensic, the remains would come under the jurisdiction of the State Coroner and the Coroners Act 2009. The NSW Police would likely secure the site and will advise on the procedure to be followed.

- **Archaeological – non-Aboriginal human remains (more than 100 years old).**

  Actions: Notification to OEH and, Heritage Division. Follow the Archaeology Exhumation Methodology as set out in Step 4.

- **Archaeological – suspected Aboriginal human remains (more than 100 years old).** The RAPs must be present where it is reasonably suspected that Aboriginal burials or human remains have been encountered. Recording of Aboriginal ancestral remains must be undertaken by, or be conducted under the direct supervision of a specialist.

  Actions: Notify RAPs and follow ACHAR (Artefact Heritage 2016). Notification to OEH and Heritage Division. Follow the Archaeology Exhumation Methodology as set out in Step 4.

4. Archaeological Exhumation Methodology

The following section provides the archaeological methodology for exhumation and the appropriate handling of human remains.

**Securing the Site:** The strategy for the excavation and removal of human remains must be sensitive to public opinion and ethical issues and exhumation activities should not be visible to the general public. The site may need to be screened off from public areas, not only with hoarding but also in some cases with a roof to screen the site off from overlooking buildings. At all times, human remains should...
be treated with respect and dignity. The perimeter of the excavation site should be demarcated by plastic tape or flagging and only technical staff allowed in this area for the duration of exhumation activities.

**Excavation Director:** Archaeological investigations would be managed by a suitably qualified Excavation Director with experience in the historical archaeology of Sydney and management of human remains. For sites with potential for locally significant remains the Excavation Director should meet the NSW Heritage Council criteria for locally significant archaeological sites. For sites with potential for State significant archaeology the Excavation Director should meet the NSW Heritage Council criteria for State significant archaeological sites.

**Excavation and Recording:** Exhumation and recording would be undertaken in accordance with best practice forensic and Heritage Division guidelines. Prior to removal, the remains need to be fully recorded in situ to understand their surrounding archaeological context. This will include recording any disturbances to the burial, identification of bones present. In some cases, the deposit of bones may be a mixture of articulated and disarticulated remains and care should be taken to distinguish articulated remains, and to assess if they represent commingled individuals or disturbed remains belonging to one individual, and to record them accordingly.

**Recording:**
- A standard context recording system will be employed.
- Detailed survey and/or measured drawings would be prepared and include location of remains within the overall site (position of the body, the direction of the burial, noting any stratigraphic relationships with other archaeological features).
- Any associated artefacts (potential grave goods, burial furniture) would be recorded and collected by context for later analysis.
- Digital photography, in RAW format, using photographic scales and photo boards where appropriate. A photographic record of all phases of the work on site would be undertaken.
- Registers of contexts, photos, samples and drawings would be kept.

**Excavation:**
- Detection of the extent of the grave/remains (if disarticulated).
- Surface soils removed in excavation units of 100mm (site dependent) using small tools.
- Expose remains with soft paint brushes and pedestal the remains.
- Record position and depth of remains.
- Soil removed would be sieved through 3mm mesh to examine for trace elements.
- Soil samples may be taken from the abdominal and/or chest areas of the body (articulated remains) to retrieve evidence of gallstones or worm infestations.
- Exhumation would be under the control of the Excavation Director/Forensic Anthropologist and in the presence of an authorised officer or a member of staff of the Ministry of Health.
Further excavation of the bottom of the pit (grave) following removal to confirm the absence of further remains.

Relocation of bones:
- Removal and collection of skeletal remains to follow standard forensic practice of labelling.
- Remove remains from the ground systematically and place in plastic bags according to anatomical areas of the body.
- Bags should not be air-tight and should have ventilation holes to prevent deterioration of fragile skeletal material. Each bag should contain labels and the separate bags should then be placed in a large plastic bag, crate or box, labelled with the context information.
- The remains should be placed in a sturdy, large cardboard box (approximately 600 x 300 x 200 mm) for relocation to off-site processing location.

Resume work: Construction work may only recommence upon receipt of clearance from both the Excavation Director and Health official. If a forensic case, written authorisation from the NSW Police is required.

Reporting: Stage 2 will outline research questions and the post-exavagation processing procedure. A report would be prepared following the completion of the program of exhumation works, separate to the archaeological excavation report for the project. This report would include skeletal analysis catalogue, comprehensively describe the process of exhumation, detail the recording of the remains and synthesise the results of any further laboratory testing. An assessment of significance for the remains would be provided and interpreted within the context of the archaeological research design (response to research questions.)
Figure 4: Exhumation Policy flow chart
3. **Addendum**

NSW Heath Policy Directive for Exhumation of Human Remains including template application for permission to exhume the remains of a deceased person (NSW Ministry of Health).

4. **Accountabilities**

The Executive Director, Safety, Sustainability & Environment is accountable for this Plan including authorising the document, monitoring its effectiveness and performing a formal document review.

Direct Reports to the Program Director are accountable for ensuring the requirements of this Plan are implemented within their area of responsibility.

Direct Reports to the Program Director who are accountable for specific projects/programs are accountable for ensuring associated contractors comply with the requirements of this Plan.

5. **Definitions**

All terminology in this Plan is taken to mean the generally accepted or dictionary definition. Other terms and jargon specific to this Plan are defined within SM QM-FT-435 Integrated Management System (IMS) Glossary.

6. **Related Documents and References**

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7. **Superseded Documents**

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8. **Document History**

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<td>1.1</td>
<td>May 2017</td>
<td>New IMS document.</td>
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Addendum 1

NSW Heath Policy Directive for Exhumation of Human Remains
Mr Stuart Hodgson
Principal Manager,
Program Sustainability Environment & Planning
Sydney Metro
Transport for NSW
PO Box 588
NORTH RYDE BC NSW 1670

Dear Stuart

RE: Endorsement of Sydney Metro City and Southwest Exhumation Management Plan

Thank you for providing the following document for Environmental Representative (ER) review and endorsement as required by the Condition of Approval E27 of the Sydney Metro City & Southwest project (SSI – 15_7400 January 9 2017).

- Sydney Metro City and Southwest Exhumation Management Plan, SM ES-PW-315 version 1.1, May 2017

As an approved ER for the Sydney Metro City & Southwest project, I have reviewed this document and consider the referenced version appropriate for endorsement for implementation to guide the relocation of recovered human remains and submission to DPE for information prior to commencement of excavation works at Sydney Metro City & Southwest project.

Yours sincerely

Annabelle Tungol Reyes
Environmental Representative – Sydney Metro – City and South West
SYAB and HV