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**'A State of Belonging? Museums, Archaeology Collections and Heritage Legislation in New South Wales' with comments and reply  
SCOTT MITCHELL, MICHELLE RICHARDS, OLIVER BROWN, ANDREW COSTELLO AND ALLISON DEJANOVIC**

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*Scott Mitchell presented 'A State of Belonging? Museums, Archaeology Collections and Heritage Legislation' at the Australian Association of Consulting Archaeologists Inc (New South Wales Chapter) Archaeological Event held in June 2014 at the Big Dig Centre in Sydney. A dynamic discussion from AACAI members, consultant archaeologists, museum professionals and students followed this presentation. Here we aim to continue and promote the conversation about how we should retain the archaeological cultural resource for future generations. In this paper Scott introduces the 'curation crisis' facing the Australian Museum, followed by comments from professional archaeologists and heritage practitioners outlining some of the key issues expressed during the discussion at the event. It concludes with Scott's reply to the comments.*

### **Presentation: Aboriginal archaeology and museums**

Dr Scott Mitchell, Head, Culture, Conservation and Consulting, Australian Museum

Indiana Jones: That belongs in a museum.

Rene Belloq: So do you. *Raiders of the Lost Ark*, 1981

Where do the artefacts and other objects so painstakingly assembled by archaeologists belong? In a museum? A community keeping place? Back in the ground?

Thirty years ago the answer may have seemed obvious, at least in the movies. As *Raiders of the Lost Ark* opens, archaeologist Indiana Jones defies his rival Rene Belloq and a band of angry Hovitos warriors by trying to take the tribe's golden idol back to his museum. When curator

Marcus Brody says later 'The museum will buy anything you bring back of course' we are left in no doubt where archaeology 'belongs'. It is no surprise therefore when Belloq, who stops Jones from taking the idol back to its 'proper' place in the museum, is revealed to be a Nazi.

In the same month that *Raiders* appeared in Australian cinemas (December 1981), John Mulvaney published an equally revealing essay in *Australian Archaeology*. He happily reported that all major Australian state and territory museums were employing archaeologists, upgrading archaeological collection storage and playing a major role under each jurisdiction's heritage legislation. As in the movie, museums were seen to have a natural role as owners and managers of archaeological collections. And (strangely enough) just like the movie the Nazis were the

enemy, with Mulvaney comparing 'Aboriginal academic leaders' asserting 'total ownership of their past' to the '...Aryan racial intolerance of Hitlerite Germany (Mulvaney 1981:20).

Mulvaney's reference to National Socialism is not the only jarring note to a contemporary reader. His cheerful optimism regarding the state of archaeology collections stands in marked contrast to today. A recent national symposium of archaeology collection managers described repositories as being '...in crisis [and] at capacity...groaning under the weight of poorly housed, insufficiently documented and in many cases unregistered assemblages' (Smith CHF 2011:105). Meanwhile, every archaeologist has stories of collections destroyed or reburied due to the lack of storage alternatives, or of collections accumulating in offices, laboratories or bedrooms awaiting resolution of their fate.

In part these problems can be attributed to resourcing issues and the 'curation crisis' affecting archaeological repositories around the world (e.g. Childs et al. 2010, Childs 2011; Merriman 2011). Museums have been unable to expand curatorial capacity fast enough to match the rate at which new assemblages have been generated through research and salvage activities. In Australia, however, there are at least two other trends impacting on the extent to which archaeological assemblages can be said to 'belong' in museums.

The first trend relates to how Museums have increasingly recognised the legal and moral rights of Indigenous people over cultural collections (e.g. Museums Australia 2005), and correspondingly moved to shared models of collection ownership. Examples include repatriation programs, the storage of cultural property in museums on behalf of Aboriginal owners and long-term loans to Indigenous keeping places.

Ultimately such measures may not be enough to satisfy community expectations. Wiradjuri elder Steven Ryan recently called for the Australian Museum to relinquish all of its Indigenous

collections to Aboriginal ownership, noting eloquently that: '...all of our memories, sites and artefacts are sacred' (*Sydney Morning Herald* 10 September, 2011). Unfortunately, Indigenous keeping places appear to be too few in number, and too poorly resourced, to meet many communities' aspirations to actively manage their heritage (McIntyre 2012; Mitchell 2013). While some stakeholders question whether archaeological collections now belong in museums, there is as yet limited capacity for archaeological storage in the most obvious alternative places.

The second significant trend relates to the changing role of museums in heritage management and regulation. The heritage legislation applying in the 1970s and early 1980s, often referred to collectively as the 'relic acts' (e.g. Smith L 2000:112), assigned a central role to museums. In most Australian jurisdictions the state or territory museum was the agency responsible for administering heritage legislation when it was first introduced. Across the country, museum representatives were automatically appointed to the formal councils established to advise heritage ministers, and museums were typically nominated as default repositories for archaeological relics.

Over time Museums have moved from the centre to the periphery of Australian Indigenous heritage legislation and administration. Examining contemporary legislation reveals that in most jurisdictions there is now no statutory role for museums in archaeological management and protection, and in the few cases where statutory repositories continue to be nominated under state legislation, the scope is greatly restricted. The decline of statutory repositories can be seen in one sense as a welcome corollary to the greater recognition given in modern legislation to contemporary Indigenous rights and cultural values. However, modern legislation provides much less guidance as to how the archaeological objects collected under salvage or research programs should be cared for or maintained.

Unless the legal and policy vacuum on this issue is addressed, archaeological collections will continue to be orphaned.

### **Archaeology and the Australian Museum**

Recent experiences at Sydney's Australian Museum can be used to illustrate many of these themes. The Australian Museum first began collecting archaeological material in NSW in the 1830s, and employees such as Robert Etheridge, Frederick McCarthy and Elsie Bramell were pioneers of the field. With the passage of the *National Parks and Wildlife Act* in 1974, the museum became a statutory repository for archaeological remains in NSW. The rate at which archaeological remains were deposited at the museum exploded, increasing by a factor of more than 20 times.

Amongst the more than 18 million items held in the Museum's collections, archaeology poses unique challenges. It is the only discipline for which a collecting role is authorised by a piece of legislation other than the Museum's own governing act, and the only collection legally owned by the Crown rather than held in the legal custody of Museum Trustees. Crucially, it is the only discipline where the rate and scale at which collections are created is completely outside the control of the Museum.

Faced with these challenges, and in the context of the wider 'curation crisis', the Museum effectively closed the archaeology collection to new acquisitions between 2002 and 2010. In 2012 it published a new policy to define the conditions under which the Museum will accept depositions of archaeological material, as well as expanding storage and curatorial capacity (Mitchell 2013).

The new policy seeks to provide a sustainable way to enhance the service potential of the archaeology collections, and to deliver the Museum's (limited) function as repository under NSW heritage legislation. It is built around three principles:

1. Sustainability: lodgement fees apply to most new depositions and depositors are

responsible for packaging and documenting collections

2. Selective acquisitions: material is only accepted after an assessment of its cultural and scientific significance and the Museum's capacity to hold it
3. Indigenous consent: collections will only be accepted with relevant stakeholder approval.

Based on current capacity, the Museum expects to accept only a small proportion of the total amount of archaeological material being generated in NSW. As such, the question of where archaeology collections 'belong' remains as relevant as ever.

### **Valuing archaeological collections**

Philosopher Stephen Weil (2002:147-148) argued that in order for museums to remain relevant into the future they need to move: '...from being about something, to being for somebody...'. Cultural and scientific collections, he argues, are not inherently significant, but instead derive their value through the services that can be delivered while using them.

Following the recent collection management changes, archaeology now ranks amongst the most frequently accessed of any of the 15 major cultural and scientific collections housed by the Museum. Users include professional archaeologists, students and Aboriginal community members. Sydney archaeology features prominently in its new *Garrigarang: Sea Country* exhibition, and the collections will also feature in school education programs rolled out under the new National Schools curricula.

Understanding how archaeological collections became orphans requires us to consider questions of legislation, government policy and resourcing. Understanding where they belong involves determining how, and by whom, they are going to be used.

## Comment

Michelle Richards, Treasurer AACAI NSW Chapter;  
PhD Candidate ANU

The core issue is whether Aboriginal objects excavated in NSW are protected for the benefit and enjoyment of current and future generations as tangible Aboriginal cultural heritage and as archaeological resources. The objectives of the *National Parks and Wildlife Act 1974 (NSW)* at s2A are to be achieved by applying the principles of ecologically sustainable development (ESD). Intergenerational equity is a fundamental principle of ESD that asks the current generation to consider the availability and accessibility of resources, including cultural resources, for future generations in decision making processes.

Currently there are serious intergenerational equity issues accruing with the increasing volume of excavated Aboriginal objects in NSW. As Scott outlined, the Australian Museum was forced to stop accepting archaeological material in 2002 and in 2012, issued a new policy relating to the deposition of archaeological materials that stipulated a right to refuse materials based on the significance of the material and its capacity to accept it. The discussion at the AACAI event revealed that Aboriginal objects are still not being deposited at the Australian Museum. It is difficult to know where all the Aboriginal objects from NSW archaeological excavations from 2002 up until the present may be. For example, there is no easy way to track assemblages through the NSW Aboriginal Heritage Information Management System (AHIMS).

In order for an Aboriginal Heritage Impact Permit (AHIP) to be issued, the care of the Aboriginal objects must be identified. Presumably if Aboriginal objects are not going to the Museum, they must be going into Keeping Places. However, this is not the case (Miller 2011). Under s. 85A of the *National Parks and Wildlife Act 1974* the Director General may 'dispose' of Aboriginal objects that are the property of the Crown and return the objects to the Aboriginal owner(s) or an Aboriginal person or community.

The onus is then on Aboriginal people or heritage consultants to find a storage solution so that the developer can fulfil the AHIP application checklist. However, there are limited designated Keeping Places and, as standalone facilities, Aboriginal communities have generally struggled with maintenance issues (Miller 2011: 6). Developers argue that the development plans have been finalised and there is nowhere to build a Keeping Place in their development.

Returning Aboriginal objects is not straightforward. Section 85A(1)(a) of the *National Parks and Wildlife Act 1974* requires Aboriginal owners accepting Aboriginal objects to protect, conserve and make objects accessible for research or cultural practice in accordance with Aboriginal tradition in perpetuity. This is an enormous task for Aboriginal owners to achieve unfunded (McIntyre 2012). Alternatively, s85A(1)(b) allows for the Aboriginal objects to be dealt with 'in accordance with any reasonable directions of the Aboriginal owner(s)'. Or more commonly in NSW, under s8A(1)(c) and cl88 NPW Regulation, where there are no Aboriginal owners objects may be transferred to an Aboriginal person as defined in s4(1) of the *Aboriginal Land Rights Act 1983*, or an organization representing Aboriginal people, for safekeeping.

Recently, a trend has developed for reburying Aboriginal objects near the excavations and for that location to be registered as a 'temporary secure storage location' site on AHIMS (NSW Office of Environment and Heritage 2010, Requirement 26). This practice, outlined in the Requirement 16b of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW 2010* refers to Aboriginal objects recovered from test excavation, but not necessarily salvage excavation of significant sites. Most heritage practitioners and some Aboriginal representatives are uncomfortable with reburial of Aboriginal objects because it is not in accordance with the intergenerational equity principle. However, this reburial practice

has become so common that the AHIP application form now asks for GIS co-ordinates for reburial locations on site. The main issue is that the protection of the reburied Aboriginal objects is not guaranteed in perpetuity by this process because the new reburial site can be subject to another AHIP application in the future. Additionally, the lasting integrity of the required documentation (see Brown's comment for further discussion) to accompany the Aboriginal objects after decades underground is questionable.

The reburial of Aboriginal objects lacks intergenerational justice. Future generations will need to bear the costs associated with the retrieval of Aboriginal objects for research or cultural purposes, maintenance and protection of reburied Aboriginal objects and these new sites. Currently, there is no inspection or monitoring of the standard of reburied Aboriginal objects. Only limited guidance about the standard of housing for the reburied objects is set out in the Code of Practice guidelines under Requirement 16b and Requirement 26. There is no provision for auditing, follow-ups or for maintenance checks of reburied objects and reburial sites.

Requirement 26 states, 'The person carrying out the test excavation is responsible for ensuring that procedures are put in place so that Aboriginal objects that are reburied are not harmed'. This shifts the responsibility of caring for the Aboriginal objects away from OEH. However, this practice does not require the 'disposal' of Aboriginal objects under s85 *National Parks and Wildlife Act 1974*. Therefore, reburied Aboriginal objects, legally speaking, remain the responsibility of the government.

This is not to say that the aspirations of Aboriginal people to (re)connect to Country by returning Aboriginal objects to their original place in the landscape should be discouraged. Well-curated (i.e. to archival and guaranteed longevity standards) reburial could become a useful value-adding, protection measure in an environmental conservation zone. However, this is not happening. In Sydney's west, developments

encompass entire blocks which are excavated to four basement levels for city car parking. In one such case, OEH approved the reburial of Aboriginal objects in a 'landscape zone' (flower-pot/planter-box) in the car park at ground level. This does not achieve the objectives of s. 2A of the Act, especially the promotion of cultural heritage. In fact, such 'out-of-sight, out-of-mind' reburial obscures the existence of cultural heritage rather than promoting it.

Aboriginal objects are tangible evidence of the long occupation of Aboriginal people in the area and have contemporary social significance for the Aboriginal community. In my work as a heritage consultant it has become clear to me that the cultural and social significance of artefacts is focused heavily towards maintaining connections to place. Aboriginal groups often express concern for the long-term protection of artefacts, and there are mixed views about preference for reburial of excavated artefacts in the ground or lodgement with a museum.

However, all Aboriginal representatives I have worked with agree that the artefacts have educational value. Moreover, they can be used to promote Aboriginal culture to new people moving to the developing areas and for younger generations (school children). Keeping Places for any excavated or collected artefacts, and other educational resources, such as plain-English reports or books about Aboriginal culture and archaeological excavations, would ensure intergenerational equity. Unfortunately, there were no Aboriginal representatives attending Scott's presentation. But it is important for archaeologists and Aboriginal people to work together to ensure the on-going protection of Aboriginal objects for cultural and archaeological research reasons.

Significantly, the management of any tangible or intangible Aboriginal cultural heritage occurs only at the end of the development approval process. The current situation is frustrating, mainly because the OEH has the power to set conditions in AHIP that promote better care for

Aboriginal objects. In relation to the conditions that may be applied to an AHIP to promote ESD, under Policy 25, footnote 9 states:

This could involve such things as the provision of a keeping place for Aboriginal objects; construction of a cultural centre and interpretive signage; land set aside for cultural purposes; access to land or places of cultural significance. (NSW OEH 2011: 13)

This is not a narrow provision. A development might incorporate a facility at the site, or developers could make a contribution to a regional Keeping Place or cultural centre (i.e. ‘the polluter pays’ principle could be used).

Reburial of Aboriginal objects is an unnecessary ‘temporary’ measure given that OEH have ‘Ready to Return Centers’ which are storage locations for cultural materials that will be repatriated to Aboriginal community Keeping Places (Miller 2011: 6). However, these centres are not mentioned in the *National Parks and Wildlife Act 1974*, National Parks and Wildlife Regulations or any of the current DECCW or OEH guidelines for Aboriginal cultural heritage. From a legal perspective, if Aboriginal objects are to remain the property of the government, Keeping Places will be the best long-term solution for the benefit of future generations. OEH should promote this goal, instead of approving graveyards for Aboriginal culture by permitting the reburial of Aboriginal objects without Care and Control Agreements. Perhaps real solutions towards Keeping Places will only be sought once the ‘Ready to Return Centres’ reach capacity.

### Comment

Oliver Brown, Committee Member AACAI NSW Chapter, Director, Associates Archaeology and Heritage

Scott Mitchell’s AACAI presentation, and subsequent discussions, largely with consultant archaeologists, was a wonderful reminder of the value and potential of local collegiate discourse in our profession. Scott talks from a position of

inside knowledge. When he says that the Australian Museum cannot and will not curate all the artefacts excavated in New South Wales, we have to accept this as a reality. His key points about the ‘curation crisis’ were offered as facts; the rest of us were subsequently not short of opinions. More than just hot air, however, those opinions are notable because they are the product of a huge amount of collective practical experience in the management of Aboriginal cultural heritage in New South Wales. Hopefully they contribute more than just discussion, and actually lead to some solutions. A number of issues arising from the discussion strike me as important, and with all of them I point to the proposition that in the absence of Museum curation of artefacts, the State should set up an alternative system of keeping places. Finally, I suggest that even though the Museum will only curate a small subset of the physical material, they should at least curate all the associated data.

The curation crisis is not just institutional—it is also a huge burden across the archaeological consulting industry. The assembled audience of less than 30 people at Scott’s talk was estimated to have taken part in the excavation of more than a million artefacts, a great many of which were still under their temporary control and looking for a permanent home. Collectively across the industry, consultant archaeologists in New South Wales are thought to be the reluctant curators of more Aboriginal artefacts than the Museum itself (possibly just from Western Sydney alone). The Australian Museum may have to recuse itself from discharging the State’s responsibility to accept these artefacts, but this does not then allow the State to recuse itself altogether from its obligations. The *National Parks and Wildlife Act 1974* vests the ownership of Aboriginal objects with the Crown and they therefore have a responsibility for their care in some form. The most obvious solution to me is that the State should, with curatorial support from the Museum, set up and fund a sustainable system of keeping places with Aboriginal communities.



The reburial of artefacts as an alternative to their curation has been much discussed and is opposed by most archaeologists, Aboriginal communities, museum curators and government regulators. It has, however, become increasingly common when the preferable alternatives of sustainable curation fail, are too expensive or are otherwise just too hard—whether in a museum, keeping place or through a care agreement with Aboriginal stakeholders. In the final scene of *Raiders of the Lost Ark* (a leitmotif used in Scott's talk), we see the Ark being trolleyed off to the cavernous anonymity of an enormous warehouse and not to the museum where it 'should' be. The subtext is that this is bad, but how much worse would it have been to see it tipped into a hole in the ground?

Some Aboriginal stakeholders take the view that reburial meets the desire to keep cultural material on Country, embodied within what 'always was, always will be, Aboriginal land'. But this is predicated on the idea that the reburial site can be conserved in perpetuity within actively developing land. After the talk, examples were raised of Aboriginal Heritage Impact Permits (also known as 'Consent to Destroy' under the *National Parks and Wildlife Act 1974*) being sought from the Office of Environment and Heritage to impact reburial sites that had only recently been listed and crazily short-term reburial locations such as a planter box (mentioned elsewhere here by Michelle Richards). These artefacts have value (significance); they are treasure in their own way; and burying your treasure is the last desperate resort of pirates.

Again, the most obvious solution is for the State, with curatorial support from the Museum, to set up and fund a sustainable system of keeping places with Aboriginal communities. This would achieve their aims for the cultural material to stay on country (even if in a broad sense). To make them sustainable, they may need to be low cost and secure. Even if it is uncomfortably akin to the final scene of *Raiders*, it may need to take the

form of 'reburial above ground' warehousing. But with ever-advancing approaches to lithic analysis (as discussed here by Andrew Costello), the well-known mutability of the significance of cultural material, and its need to be 'for somebody' (as Scott quotes Weil (2002) above), it is necessary that the artefacts be re-accessible.

If all the physical artefacts cannot be curated in one place, then the data at least can and should be. The core issue of the 'curation crisis' can sometimes be simplified as a question: 'after we have excavated all this material what do we do with it?' In this paper, we are concentrating on the administrative aspect to this question which relates to the physical objects. Normally when this question is asked archaeologically, however, the question is about what we are going to do with the data. An archaeological quest for data, with which we address research questions, was the rationale behind digging the artefacts up in the first place. The assessment of significance in New South Wales echoes the Burra Charter (ICOMOS, 2013), and takes cultural significance (to Aboriginal people) and archaeological (scientific) significance to be largely separable things. Archaeological significance can be taken (along with rareness and representativeness) to reflect 'the ability to address timely and significant research questions' (following Bowdler 1981). Archaeological significance therefore hinges on data; and it is a fair corollary to suggest that cultural significance hinges more on the physical objects.

The data, of course, always remain with the objects; and were the Museum to accept them they would be curating both. It is now clear that they can no longer accept all the objects; but they remain very well placed to be the best option to take on a comprehensive curation of the data. It would be appropriate to their role as a scientific institution and its aim 'to use the vast collections it houses to research, interpret, communicate and apply understanding of the environments and cultures of the Australian region' (<http://australianmuseum.net.au/Why-do-we->

have-collections). It would also be a very valuable service in a context where physical curation is through other options like reburial or a decentralised network of community curation (ideally through keeping places).

From a research point of view, lithics lend themselves particularly well to conservation on record and are fit for many research purposes if recorded to appropriate standards (along with good contextual information). For some research uses, such as inter-assembly comparisons, potentially at a state-wide scale, the centralised electronic curation of lithic data could have greater potential than the centralised storage of the cultural material itself, while requiring no appreciable physical space to put it in.

It is important to note that the proposal that the Museum curate only the data and not the objects is only offered as an alternative in the context of their refusal to do the latter beyond a relatively small subset. Some research approaches (most obviously the many forms of micro-analysis) will presumably always rely on the physical object. Moreover, the heritage values of artefacts are intrinsically tied to their tangibility. It is not to say that any amount of raw data can replace the value of the object, but that the curation of a large amount of data (as opposed to neither data nor new material) is within reach of the Museum and within their mission.

With a system of data submission in a prescribed archive-ready format made compulsory through the compliance system, the museum would become the curator of a form of collection that meets its institutional aims but which would draw very little on its resources. While time and budget constraints will usually stand in the way of researchers, especially consultants, re-examining previously excavated material for inter-site comparisons, I believe that this would be routinely done if electronic data collections were easily accessible. Also, because the collection would represent numerical data and not tangible heritage objects, ethical issues around Aboriginal community consent could be more comfortably

addressed. This proposal also fits entirely with the 'obvious solution', touted twice above, of vesting the physical curation of artefacts with Aboriginal communities (for whom significance is especially tied to the actual cultural material) in State-supported keeping places.

Creating the statutory or compliance framework to establish the generation and submission of electronic lithic data is potentially quite straightforward. Under the *National Parks and Wildlife Act 1974*, excavation technically constitutes 'knowing' 'harm' to 'Aboriginal objects' (terms defined in the Act) unless exempted by an Aboriginal Heritage Impact Permit (AHIP) or adherence to the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW 2010). With an excavation under an AHIP (typically salvage excavations or ones which cannot otherwise be done under 'the Code'), particular conditions can be attached by the Office of Environment and Heritage which could easily include electronic data submission to the Museum in a prescribed format. To require the submission of electronic data for test excavation under 'the Code' is slightly more complicated but certainly achievable. The Code is empowered by the National Parks and Wildlife Regulations 2009 and not directly by the Act; the requirements can therefore be varied by Ministerial approval without needing any particularly complicated legislative process. A compliance system for depositing physical material in State-supported keeping places could be set up in the same way, at the same time, inclusive of any requirements relating to processing costs or further contribution to their funding.

There is a real crisis in the curation of Aboriginal cultural material in New South Wales. Real solutions, as opposed to unresolved discussion, are necessary. They are not necessarily easy, but neither are they too hard. Consultant archaeologists can no longer sustain the continued care of 'orphaned collections'. The requirement for State curation of the Crown-

owned artefacts that consultants excavate is legally clear under the *National Parks and Wildlife Act 1974*, even if the requirement for the Museum to act as a repository is not so clear. In the next year or so, we expect a new Act for managing Aboriginal cultural heritage in NSW. If the issue is not resolved before or within that new piece of legislation, I can only imagine that a tipping point will be reached—anyone for class action by consultant archaeologists against the State of NSW?

### Comment

Andrew Costello, President AACAI NSW Chapter, Senior Archaeologist, Jacobs

As consulting archaeologists specialising in the investigation of Aboriginal cultural heritage, we have a special dispensation to determine the fate of the artefacts we excavate, analyse and collect. We have a moral and professional obligation to extract as much information as possible from the archaeological record, and to record artefacts in enough detail that future researchers may, in the absence of the artefacts themselves, draw inferences from the descriptions, depictions and measurements.

But can today's archaeologists anticipate the research methodologies and frameworks of the future? There is a high probability that technological innovations may one day allow researchers and their machines to perform complex analysis beyond our current capabilities, for a fraction of the time and monetary cost. Imagine: pattern recognition for conjoining artefacts and materials across landscapes; high resolution residue and use wear analysis; fracture impact dynamic reproductions as holograms. Such feats could one day be a simple process for future researchers, applicable to large batches of artefacts and revealing hitherto unconsidered data. Such innovations would change the way archaeologists interpret even single flakes.

This possibility suggests archaeologists should curate every single artefact recovered. The fact is we cannot. In the absence of unlimited storage

space only a selection of artefacts is stored, based on significance and consent. What about the rest? Aboriginal keeping places are perhaps the solution, but have yet to materialise. The Australian Museum is filled with artefacts and OEH's 'Ready to Return Centres' are reluctant caretakers. At present, different consultants must employ different strategies.

Reburial, while not ideal, is rejected outright by some consultants as an irretrievable loss to the archaeological record. However, with careful application, reburial can be considered 'below ground storage'. Artefacts are reburied close to their original site after analysis, clearly labelled to corresponding paperwork, awaiting the potential for further analysis should it be required. Reburial could be viewed as a positive outcome by Aboriginal stakeholders who reject separating artefacts from Country.

Our current technology allows us to record our reburial sites to sub-metre accuracy. Future technology may be available to record to sub-micrometre detail on artefacts and reveal information we never thought to look for; if we know where to look.

### Comment

Allison Dejanovic, Collections Officer Indigenous Archaeology, Australian Museum

Scott Mitchell presented an overview of the history and changing nature of the Australian Museum's Aboriginal archaeological collection. This can be summarised as moving from collecting for collecting's sake—boxes of curiosities—to being a custodian of cultural material, holding a collection that is of value to the Registered Aboriginal Parties and the scientific and educational institutions, and as an asset on behalf of the State.

There was an important comment made around the changes in the selection criteria for accepting cultural material at the Australian Museum. It was noted that the Australian Museum 'may' accept material, not 'must'. It was encouraging to receive enquiries and interest regarding the

process for the deposition of Aboriginal archaeological material with the Australian Museum.

Suggestions and comments were made regarding the fee structure for deposition. These ranged from a fixed fee to a sliding fee scale, related to the size and/or expense of the development with a minimum and maximum fee. This would replace the current AHIMS site fee, which was seen as especially cumbersome for long corridor developments.

During the discussion it was noted that there is a need for the earlier inclusion of Aboriginal Object management in the planning process, and specification before collection of where the cultural material is to be housed. Registered Aboriginal Parties must have given their approval for the material to come to the Australian Museum, and therefore discussions should be held earlier in the overall process.

Questions were raised about what consultants do with all the archaeological material collected in the last 12 years, while the Museum has been closed for depositions. Where is this material currently being held? Is it still being held by the developers, or consultants? What is the legal situation?

Concern was flagged for the need to maintain a balance between consultants working on behalf of developers, care for the cultural material and upholding the laws regarding this sensitive cultural material. Consultants have to deal with the three pronged approach with discussions with Registered Aboriginal Parties, developers and State regulatory bodies and maintain an ethical balance and their integrity.

I would like to invite consultants to visit the Australian Museum to see the archaeological collection and discuss the deposition process and curatorial procedures currently in place. I also encourage students to make enquiries about volunteering and to come and work with the collection. This event was a great opportunity for consultant archaeologists and Australian Museum

staff to meet each other and I thank the AACAI for the invitation to attend.

### Reply

Dr Scott Mitchell, Head, Culture, Conservation and Consulting, Australian Museum

Taken together Michelle, Andrew and Oliver's responses show how common the practice of reburying salvaged archaeological collections has become in NSW. They also illustrate the diversity of opinion amongst the various stakeholders about this practice. Some concerns go to the physical vulnerability of reburied collections. Michelle's example of an assemblage reburied in a car park planter box is particularly alarming given the lack of any ongoing process to monitor reburied objects. Other worries include the potential loss of collections to future generations of Aboriginal people, the amorphous but potentially serious legal responsibilities incurred by consultants with archaeological material in their care, and an inability to gain new data from assemblages as analytical techniques evolve. On the other hand, it is clear that many Aboriginal stakeholders welcome the reburial of artefacts 'on Country', and that reburial is likely to remain an ongoing option for collection storage into the future.

Having saved the Ark of the Covenant at the end of *Raiders of the Lost Ark* Indiana Jones watches this unimaginably valuable piece of cultural heritage packed into an anonymous crate. Here it will be lost amongst thousands of other identical crates in an equally anonymous government warehouse. 'Fools, bureaucratic fools', Jones fumes, 'They don't know what they've got there.' Whether objects are stored in a warehouse, a cultural facility or in 'below ground storage' (to borrow a term from Andrew), the film once again makes a relevant point. Collections can only continue to deliver value, regardless of who owns and controls them, if (as Andrew says) we 'know where to look' for them.

Michelle therefore makes a critical point when she raises concerns about how to ensure the

‘lasting integrity’ of the documentation associated with any Aboriginal objects that are reburied. Unfortunately, such concerns are not just applicable in the context of reburial, but may apply to collections held in museums and keeping places as well. Some practitioners express concern that museums across the nation, while starved of resources for the curation of archaeological assemblages, have not been able to maintain adequate documentation for the collections in their care. As Charlotte Smith (2011: 107) has asked: ‘...why do regulatory bodies grant consent for archaeological excavations if we...cannot accurately articulate what is held in collections...around the country due to poor record keeping’.

As all commentators point out, maintaining appropriate records is as important as maintaining physical collections. In this context, Oliver’s call to create a ‘resilient lithic data curation system’ is intriguing. The collaborative FAIMS (Federated Archaeological Inventory Management System) database may offer some insights into how this could be achieved. More broadly, the highly successful collaborative scientific and cultural digital collection platforms such as Atlas of Living Australia and Trove may offer insights into how the data could even be made relevant to a wider audience.

Oliver makes what is to me, a startling point. Collectively archaeological consultants are probably caring for more Aboriginal objects than the Australian Museum. If consultants are now reluctantly storing over a million objects from western Sydney alone, then it is clearly time to consider entirely new approaches to collection care. One example might be a centralised, Indigenous-led storage solution such as the national keeping place for poorly provenanced Aboriginal ancestral remains recently proposed by the Commonwealth Government’s Advisory Committee for Indigenous Repatriation. Another option might be to expand the legal mandate and operational capacity for cultural institutions to store heritage objects owned by Aboriginal

people. A specialised example of this is provided by the Museum and Art Gallery of the Northern Territory in Alice Springs under the *Strehlow Research Centre Act 2005 (NT)*.

Measures that have recently been proposed to improve the sustainability of Australian archaeological repositories, such as new funding models, deaccessioning strategies and national standards for record keeping, are undoubtedly welcome (Merriman 2011, Smith CHF 2011). However, we also need to interrogate how archaeological collections can best serve the public (for example by supporting research and public education) and best serve the cultural aspirations of Aboriginal communities. Whatever strategies for the custodianship and use of archaeological collections are developed into the future, the old models of exclusive ownership and control of archaeological collections by museums are gone.

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## Abstracts from the AACAI session at AAA2015

The Editors, JAACA

*The Australian Archaeological Association held its annual conference 2-4 December 2015 in Fremantle, Western Australia. The theme was 'On the Edge: the archaeology of adaptation and transition'. AACAI convened a session titled 'Consulting Archaeology: teetering on or leaping off' and members were well represented. Here we present the abstracts from the papers presented. We look forward to publishing fuller versions of many of these in the next volume of JAACA.*

### Professional Archaeology as a Shifting Mosaic: Results of the 2015 Australian Archaeology in Profile Survey

Sean Ulm, James Cook University

Geraldine Mate, Queensland Museum, James Cook University

Anecdotal evidence from the consulting archaeology sector indicates a rapidly changing professional landscape in the face of a slowing resource industry and changes in legislative compliance regimes. But what do the numbers tell us? Are we teetering on the brink of a fundamental shift in what being a consultant archaeologist means? In this paper we present results of the Australian Archaeology in Profile 2015 survey of working archaeologist. We explore what indications there are of substantial shifts in the profession, particularly in consulting archaeology. Using comparisons with earlier iterations of this survey in 2005 and 2010, the paper examines changing income conditions, changing qualification levels, workplace confidence and how/whether the sector employment profile has substantially changed over the last 10 years.

### An Introduction into the Archaeology of Leongatha South

Amanda Goldfarb, Jacobs Group (Australia) Pty Ltd

There have been few previous archaeological investigations undertaken in the Leongatha South region within Victoria. This paper will discuss the results of the cultural heritage investigations undertaken on behalf of NBN TM in accordance with the Victorian Aboriginal Heritage Act 2006. A mandatory Cultural Heritage Management Plan (No 13284) was required for the NBN Fibre Spur Project, which resulted in the discovery of over 300 artefacts, in largely intact contexts. Prior to the works commencing, a salvage programme was completed in accordance with the Cultural Heritage Management Plan recommendations, with these excavations recording a further 186 artefacts. The results of these investigations provide an introductory view as to how Aboriginal people may have used the landscape near the Tarwin River, of which little was known previously in the Leongatha area.

### A 40,000 Year Long Archaeological Record from the Packsaddle and Jirrapur Ranges

Michael Marsh, Black Wattle Archaeology; Ironbark Heritage and Environment Pty Ltd

Emma Beckett, Ironbark Heritage and Environment Pty Ltd

Marjorie Sullivan, Huonbrook Environment & Heritage Pty Ltd

Philip Hughes, Huonbrook Environment & Heritage Pty Ltd

Alistair Grinbergs, Ironbark Heritage and Environment Pty Ltd

The Packsaddle and Jirralpur Ranges form part of the eastern Hamersley Plateau, which was a major focus area of Brown's (1987) Hamersley Plateau synthesis. Large systematic field surveys were undertaken in collaboration with BHPBIO heritage team, the Banjima people and heritage consultants in both the Packsaddle and Jirralpur Ranges. These systematic studies identified numerous potential rock shelter sites including rock shelters with potential archaeological deposits (PADs).

Between 2010 and 2012 three sets of test excavations were undertaken in the ranges on 37 potential rock shelter sites and rock shelters with PAD. The three sets of test excavations returned significant radiocarbon dates associated with cultural materials in many of the tested rock shelters. These radiocarbon dates demonstrate this part of the Hamersley Plateau was first settled around 40,000 years ago, with episodic occupation occurring thereafter during the last glacial period, the Last Glacial Maximum (LGM) and through the Holocene.

### **Walled Structures in Rockshelters of the Pilbara, Western Australia**

Jacqueline Matthews, Wallis Heritage Consulting

Lynley Wallis, Wallis Heritage Consulting

'Walled structures' in rockshelters are relatively common features of the archaeological record in the Pilbara. While some studies of these structures have been undertaken, very few have been published. This paper draws primarily on information in the grey literature to provide a review of the current state of knowledge about this particular type of archaeological feature. Results indicate walled structures are found across the Hamersley Plateau, though they are more common in the east, as originally posited by Brown (1987). The current practice of grouping of all walled structures that occur in rockshelters into a single site type category conceals the wide variation amongst these features. Closer examination suggests there are several different types of walled structures in rockshelters: (1)

'Walls' that seal off small, often narrow, low ceilinged crevices or niches; (2) 'Walls' that totally or partially prevent access to otherwise potentially habitable rockshelters; and (3) 'Walls' that bear some resemblance to features in the previous category in terms of their size, but that do not prevent access to a potentially habitable rock shelter owing to the existence of other open entrances to the site. Two other types of walled structures are not walls per se, but are instead essentially self-standing structures that can be separated into two types: (4) Cairns, which have a cavity or chamber within the rocks; and (5) Piles, which do not have a cavity or chamber within. It is strongly suggested that, during recording, these features be systematically categorised according into defined sub-types to help develop a better understanding of their distribution, significance and possible function(s).

### **'Make it Big': The Community Driven Future of the Badimia Granites**

Megan Tehnas, Terra Rosa Consulting

Zsuzsanna Gonda, Terra Rosa Consulting

Frank Wash, Badimia Lands Aboriginal Corporation

In early March 2015, the Federal Court handed down its decision regarding the Native Title claim of the Badimia People. The Court did not rule in favour of the claimants due to connection issues, arguing that the Badimia people were not able to establish proof of being associated with the lands in question at sovereignty, demonstrate continuous connection to country, or prove apical ancestors listed on the claim were Badimia people. This decision played a significant contextual backdrop for the outcomes of a community consultation in relation to The Granites Complex (DAA ID 5518) in late March.

The Granites Complex, a registered site listed as containing artefact scatters, engravings, grinding patches and paintings, is an important local area for both the Badimia people and the wider Mount Magnet community. Formerly managed by the Western Australian Museum, the site and its facilities are currently in dire need of



maintenance due to ongoing confusion over management responsibilities. As a result, a Cultural Heritage Interpretation Plan (CHIP) was commissioned by the Badimia Lands Aboriginal Corporation (BLAC) in order to build a management framework for the site. The field consultation and development of the CHIP was undertaken in collaboration with the Traditional Owners. The plan identified a number of strategies that could be used to upgrade the site, better preserve the landscape and its archaeological values, form partnerships with local Aboriginal businesses, build community pride and assert Badimia identity. This would be achieved through a range of conceptualised programs for sustainable development driven by the Badimia people.

This presentation discusses how the importance and significance of the Granites Complex has become greater than its meaning under the Aboriginal Heritage Act 1972. In the context of the Federal Court decision, the proposed Granites upgrades are a statement of Badimia history, connection to country and identity.

### **When Consulting Isn't Consulting: From Catchment Groups to Regional NRM Bodies**

Diana Neuweger, Perth NRM

Catchment Groups have long been responsible for undertaking Aboriginal Heritage projects within the Natural Resource Management sector. Changes in Governments and programs have seen significant cuts to funding budgets and changes to the alignment of funding in the Aboriginal Affairs sector. This paper looks briefly at the history of Catchment Groups and Regional Natural Resource Management Bodies (NRMs) and the changes in programs and drivers relating to government subsidised Aboriginal cultural heritage programs.

The paper also looks at the current National Landcare Program under which Aboriginal NRM activities currently fall, and the paper explores issues of 'Closing the Gap' targets being a driver

to undertake these Aboriginal NRM and Aboriginal cultural heritage management programs. This paper looks at project examples from across Australia and what this funding has been able to achieve. It looks at how in trying to achieve these outcomes, additional funding and support needs to be leveraged. New relationships between the NRMs and consultants working in the field of cultural heritage management are one way of maximising Aboriginal engagement and cultural heritage outcomes for communities and for clients. Examples of some of the challenges and successes from one of the urban NRMs, the Perth NRM are also explored.

### **Times Are Changin' Back – Consulting Archaeology on the Edge in Western Australia in 2015**

David Walshe, Gavin Jackson Cultural Heritage Management

Ian Ryan, Gavin Jackson Cultural Heritage Management

The heritage industry of Western Australia (WA) has gone through significant changes over the last four years, primarily in response to changes in the way the Aboriginal Heritage Act 1972 (WA) (the Act) is being administered by the state Department of Aboriginal Affairs (DAA). These changes were initiated following a review of the approvals processes focusing on the definition of what constitutes a site under section 5 of the Act and the application of strict criteria to any places lodged with the DAA prior to them being added to the registry. This, along with several other recommendations of the review, has informed a raft of changes to the way the Act is interpreted by the department.

This process of reform within the DAA has led to a significant decline in the number of places being considered sites under the Act by the Aboriginal Cultural Material Committee (ACMC). In order to provide clarity to various stakeholders, the DAA published guidelines in August of 2013 detailing criteria that the department and the ACMC apparently use when assessing Aboriginal heritage sites. In this presentation we review how Gavin Jackson

CRM, an archaeological consulting company based in Perth, has altered the methods we use to assess and record archaeological sites in the field to ensure that only places that we consider to align with the criteria outlined by the DAA are recorded. We also review changes that we have made to the structure and content of reports so as to address the guidelines provided by the department. Finally, we review how successful we have been in our attempts to conform to the DAA's guidelines, consider how this success might be measured (if at all), and contemplate the future of both the heritage industry and the archaeological record of Aboriginal people in WA.

### **Regulating the Regulator: An Explanation of the Western Australian Site Watch Project, Its Methodology and Results**

Tom Sapienza, University of Sydney, AHMS

Joe Dortch, University of Western Australia

Site Watch is a project started by Dr Joe Dortch and Tom Sapienza as part of exploratory data analysis on the Western Australia (WA) Department of Aboriginal Affairs (DAA) Aboriginal Heritage Sites dataset. This dataset, which contains all WA Aboriginal heritage sites (per the WA Aboriginal Heritage Act 1972), records spatial information and a range of attributes for each site. Some members of the heritage community had concerns about internal changes to the dataset, but these concerns weren't necessarily made with reference to the underlying data. As a result, we decided to do a quantitative longitudinal analysis on the dataset to determine the extent to which these concerns could be assuaged or backed up by what was included within the DAA Heritage Sites dataset. We quickly learned that there were a number of things within the dataset that proved these concerns to be correct, and our analysis raised even more questions about the dataset, the processes by which it was maintained and corrected, and the processes by which Aboriginal Heritage Sites were recorded and registered.

This paper will do four things. First, it will discuss the specific methodology by which our analysis proceeded, as this methodology may be of use for archaeologists and Aboriginal stakeholders in other states and territories. Second, this paper will provide a quick discussion of some of the findings from our analysis that we found most interesting. Third, this paper will discuss what our findings and analysis mean for any consulting heritage professionals working with the DAA Aboriginal Heritage Sites dataset. And finally, we will discuss what our findings mean for anyone in Australia working with heritage regulators, and how government moves towards 'increased transparency' can ironically hide processes and decisions unless concerned stakeholders take steps to regulate the regulators.

### **Consistency of Approach in Archaeological Consulting: The Assessment of the Aboriginal Cultural Landscape Between Woolgoolga and Ballina**

Georgia Wright, RPS

Joshua Madden, RPS

Rebecca Parkes, Navin Officer Heritage Consultants

Erin Williams, Navin Officer Heritage Consultants

Roads and Maritime Services engaged RPS Group and Navin Officer Heritage Consultants (NOHC) to undertake the final stage of archaeological investigations prior to the construction of the Woolgoolga to Ballina (W2B) Pacific Highway upgrade. The W2B project involves the upgrade of 155 km of road between Woolgoolga and Ballina, traversing multiple environmental, archaeological and cultural landscapes. RPS Group is responsible for the Woolgoolga to Iluka Road section and NOHC is responsible for the Iluka Road to Ballina section.

The W2B project provided an opportunity for RPS Group and NOHC to develop independent, but complimentary and mutually consistent, approaches to assess and interpret the complexities of the Aboriginal cultural landscape across multiple landforms and traditional

boundaries. This paper focuses on the importance of the consistency of approach in a consulting context.

From the outset, RPS and NOHC established a clear and well-defined landscape approach, taking into consideration environmental contexts, previous archaeological investigations and diverse ethnographic sources. The final reports will provide interpretations of both the variability and homogeneity that exists within the Aboriginal cultural landscape that the W2B project traverses. Both consultancy firms will be tackling questions relating to the economic, social and environmental factors affecting Aboriginal land use. This paper emphasises the importance of a consistent research based approach to achieve a more holistic interpretation of the landscape, using the Woolgoolga to Ballina upgrade as an example of how consultants can collaborate in order to achieve more meaningful results.

## On the Edge of Ethics: Worst Practice Consulting in New South Wales

Cynthja Pappin, Wakool Indigenous Corporation

Raymond Kennedy, Elder Muthi Muthi

Gary Pappin, University of South Australia

The New South Wales (NSW) government is currently undertaking pipeline and associated works for the National Water Basin Plan. Unlike other governments, NSW is interpreting the law at its very basic level. As a result archaeological consultation with Aboriginal communities has become reminiscent of the early 20th century. With no access to archaeological survey or excavation, no access to their Traditional Lands and no legal recourse the tribes of NSW are naturally outraged. This paper discusses the example of the Mutthi Mutthi people, traditional owners of Lake Mungo, and how over 40 years of championing culturally appropriate and ethical best practice archaeology has been completely overridden by a government policy focused purely on economics.



## Submitting to the Journal

The Journal of the Australian Association of Consulting Archaeologists (JAACA) is a peer reviewed journal that aims to encourage the communication of results, and exchange of ideas and information about issues of relevance to professional practice in Australia.

The primary content of the journal is short reports (about 2000-2500 words) on topics such as interesting presentations of surveys, site recording and excavation results, and discussions about aspects of methodology, policy, legislation, public engagement, professional development, ethics etc. Contributions with a strong visual element are encouraged.

Longer articles (up to about 5000 words) will also be considered for publication, as will themed special issues or supplements.

Articles are published online on the AACAI website once they have completed the acceptance process, available to members only. At the end of each year, the current volume is closed off and a PDF made available to members. General access to issues of the journal is publicly available within four months.

Opinions expressed in JAACA are those of the authors and are not necessarily the view of AACAI.

Authors wishing to publish in the Journal of the Australian Association of Consulting Archaeologists are encouraged to contact the editors regarding potential articles or ideas for special supplements.

The full requirements for format of submissions can be found on the AACAI website.

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