



AACAI Secretariat
Box 196
585 Little Collins St
MELBOURNE VIC 3000
aacai.wa@gmail.com
www.aacai.com.au

AUSTRALIAN ASSOCIATION OF CONSULTING ARCHAEOLOGISTS INCORPORATED

Hon. Don Punch

Minister for Aboriginal Affairs; Water; Climate Resilience; South West
via email: Minister.Punch@dpc.wa.gov.au

23 June 2026

Dear Minister

Native Title and Aboriginal Cultural Heritage Processes Review

The [Australian Association of Consulting Archaeologists Incorporated](http://www.aacai.com.au) (AACAI), as the peak body representing professional and consulting archaeologists in Western Australia, welcomes the release of the *Review of Native Title and Heritage Processes in Western Australia*, written for the WA State Government by the National Native Title Tribunal (Kelly and Clark, 9 February 2026). AACAI views the review as being a fair representation of the complexities of Aboriginal cultural heritage work in Western Australia.

We note that the State Government has committed to acting on many of the recommendations of the Review and, in particular, we support the plan to expand the public information base around cultural heritage surveys and the development of policies and guidance materials on cultural heritage survey reporting requirements and standards. We note that in reference to Recommendations 21 and 22, AACAI already have in place a [Code of Ethics](#) and practice standards (including [Recommended Minimum Fee Scale](#), a [Policy on Consulting with Aboriginal Communities](#), and [Guidelines on Internships and Employing Trainee Archaeologists](#)); however, we wish to see these more widely implemented across the industry. We also support a certification program and welcome the opportunity to collaborate on the development of such an initiative.

AACAI wishes to express our deepest concerns about the misrepresentation of the Review findings as well as spurious attacks on heritage consultants in the media. There has been an ongoing and targeted misinformation campaign since the 1990s against heritage consultants involved in Aboriginal cultural heritage management, mainly led by the Association of Mining and Exploration Companies (AMEC). Recently, AMEC CEO, Warren Pearce, claimed that “money that should be making a real difference in their communities ends up in the hands of an army of lawyers and consultants bleeding the process dry”. AACAI finds AMEC’s suggestion that heritage practitioners are involved in actively stopping money from going to Aboriginal communities to be abhorrent and we strongly reject them. Further, we note that the report on which these claims were based (<https://amec.org.au/campaigns/aboriginal-cultural-heritage/>) is incorrect and misinformed about the Aboriginal heritage process. These outrageous and deliberately dishonest claims serve no purpose



AACAI Secretariat
Box 196
585 Little Collins St
MELBOURNE VIC 3000
aacai.wa@gmail.com
www.aacai.com.au

AUSTRALIAN ASSOCIATION OF CONSULTING ARCHAEOLOGISTS INCORPORATED

except to further fracture the working relationships between all parties and undermine the protection and conservation of Aboriginal cultural heritage itself.

AACAI believes it is essential that all engagements undertaken by heritage consultants relating to First Nations Australians' cultural heritage should be underpinned by the principles outlined in Article 8 of the United Nations Declaration of the Rights of Indigenous People (UNDRIP), and they should be completed by professionals who are appropriately qualified, experienced, and have the knowledge and skills to undertake a reliable and quality assessment. Additionally, AACAI reiterates our support for the empowerment of First Nations Australians in making decisions about their own cultural heritage.

AACAI has a [long history](#) of its members volunteering their time to provide guidance and advice to the State Government with the aim of improving outcomes for Aboriginal cultural heritage in Western Australia. Our [members](#) collectively have a broad range of expertise, knowledge, experience and research outputs beyond technical archaeological skills that can add substantial depth to the policies and programs to be developed. We have numerous documents and resources available to assist the Government and have previously provided these to, and worked with, the DPLH on similar matters. Given this depth of experience, AACAI requests to be involved in the development of the public information base around Aboriginal cultural heritage, the development of policies and guidance materials on heritage survey reporting requirements and standards, and the development of the heritage consultant certification program.

AACAI seeks an opportunity to meet with your team and discuss how we can be involved in the process. We look forward to working with the Government on improving Aboriginal heritage policies and practice in Western Australia. Please contact the AACAI WA Chairperson Dr Emma Beckett by email (aacai.wa.chair@gmail.com) to advise on a suitable time to meet.

Yours sincerely

Dr Ian Ryan
President
Australian Association of Consulting
Archaeologists Incorporated

Dr Emma Beckett
Chair
Australian Association of Consulting
Archaeologists Incorporated – WA Chapter

cc: Lauren Heinritz, Senior Policy Advisor, Aboriginal Affairs: lauren.heinritz@dpc.wa.gov.au
Mr Anthony Kannis, Director General, Department of Planning, Lands and Heritage, via email:
Anthony.Kannis@dplh.wa.gov.au
The Registrar of Aboriginal Sites, Department of Planning, Lands and Heritage, via email:
Registrar@dplh.wa.gov.au