

## DSMG Working Group Issues Register: Updated January 2026

| Item | Issue   | Date      | Likelihood   | Impact | Notes  |
|------|---|-----------|--------------|--------|--|
| 1.   | <b>Construction disruption to the ongoing use of the BNI</b>      | July 2025 | Medium       | Medium | Road widening, site compounds and staged works will disrupt the BNI as an active cultural place. This includes impacts on cultural practice, community events, ecological restoration and healing activities. The BNI is not just a heritage site but a living place. Construction planning and staging must be reviewed with DSMG to minimise disruption and respond as works change over time. |
| 2.   | <b>Temporary access arrangements becoming long-term</b>           | July 2025 | Low          | Medium | There is a risk that temporary access routes put in place during construction become treated as permanent solutions. DSMG has been clear that interim access must be time-limited, clearly communicated, and must not undermine culturally appropriate and safe long-term access to the BNI.   |
| 3.   | <b>Potential impact upon BNI Heritage Listing</b>                 | July 2025 | Low          | High   | DSMG raised distress over reports that construction may jeopardise the heritage listing.<br>TfNSW clarified current protections of the site's heritage status and confirmed no impacts upon Heritage listing status  |
| 4.   | <b>Project impacts not assessed at a cultural landscape scale</b> |           | Medium       | Medium | Archaeological testing and excavation, including investigation of potential burials, may cause cultural harm if not governed by Dharug cultural protocols. DSMG has stated that cultural authority, gender protocols and decision-making must guide how archaeological work is planned, carried out and paused if needed.  |
| 5.   | <b>Cultural safety and authority in archaeological works</b>      | July 2025 | Medium       | High   | DSMG requested the inclusion of female archaeologists and cultural safety training for all consultants. They emphasised the importance of gender protocols and cultural awareness in methodology and practice.   |
| 6.   | <b>Impacts to Women's Cultural Area and Bells Creek</b>           | July 2025 | Low - Medium | High   | Changes to water flows, vegetation removal or construction near Bells Creek may affect culturally significant women's areas  |

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|-----|---|----------------|--------------|---------------|---|
|     | .   |                |              |               | and ongoing cultural and ecological work. DSMG has requested specialist hydrology advice and that any mitigation measures be designed together with the community before works proceed in sensitive areas.  |
| 7.  | <b>Risk to Indigenous Cultural and Intellectual Property (ICIP)</b> | October 2025   | Low          | High          | Cultural knowledge, archaeological data, images and reports collected through the project may be misused or stored without clear Dharug control. DSMG has identified the need for clear governance over how cultural information is collected, stored, accessed and used, including DSMG's aim to for the development of a Dharug-controlled digital keeping place. |
| 8.  | <b>Contractor cultural safety risks</b>                             | July 2025      | Medium       | High          | There is a risk of cultural protocol breaches by contractors or subcontractors if cultural safety is treated as a one-off induction or compliance task. DSMG has emphasised that cultural safety must be Dharug-led, preference to be delivered face to face, reinforced over time and built into how the workforce operates on Country.                            |
| 9.  | <b>Early works proceeding without cultural pause points</b>         | July 2025      | Low - Medium | High          | Early or enabling works may progress in small stages without clear checkpoints for cultural review. This increases the risk that impacts occur before concerns are identified. DSMG has requested agreed pause points, on-Country reviews as needed and clear escalation processes during early works and excavation.   |
| 10. | <b>Visual, noise and setting impacts on the BNI</b>                 | July 2025      | Medium       | Medium - High | Increased traffic, new bridge structures, lighting and vegetation removal may reduce the BNI's suitability for ceremony, reflection and community use. Mitigation measures such as vegetation retention, planting, noise management and sensitive design need to be developed with DSMG and monitored during construction.  |
| 11. | <b>Cumulative impacts from multiple projects on Dharug Country</b>  | September 2025 | Medium       | High          | The Richmond Road project sits alongside other infrastructure and development pressures across Dharug Country. When considered together, these projects cause greater cultural harm   |

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|  |  |  |  |  | than when assessed individually. DSMG has raised the need for coordination and long-term thinking to avoid gradual loss of cultural values. |
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