



1 James Schofield Drive
Adelaide Airport, South Australia 5950
Telephone +61 (0)8 8308 9211
Facsimile +61 (0)8 8308 9311
Website: www.aal.com.au

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Indigenous Heritage Law Reform
Heritage Division
Department of the Environment, Water, Heritage and the Arts
GPO Box 787
CANBERRA ACT 2601

To whom it may concern

Re: Submission – Possible Reforms to the Legislative Arrangements for Protecting Traditional Areas and Objects

I am writing to you to express Adelaide Airport Limited's support for the reforms proposed by the Australian Government to provide a more streamlined, transparent and collaborative approach to heritage protection.

In 1998, the Commonwealth awarded Adelaide Airport Limited (AAL) a 50-year head lease, with an option for a 49 year extension, to develop and manage Adelaide and Parafield Airports. As the airport lessee company AAL is tasked with the responsibility of operating both airports in accordance with relevant regulatory standards in the areas of environment and heritage management, and in alignment with our corporate principles embodied in our Sustainability Policy.

Consultation and engagement with our many key stakeholders in the community, including Kaurna traditional custodians, is core to our management approach. AAL's commitments in this area have been documented recently in Volumes 3 and 4, the Sustainability and Community Plans respectively, of our 2009 Master Plan currently with Minister Albanese for assessment. I wish to highlight just one of these commitments viz; *AAL will 'continue to implement procedures for identifying and protecting archaeological artefacts' and 'provide avenues for consultation between the airport and traditional custodians – the Kaurna people'.*

In the context of these commitments, AAL offers the following comments to your proposals.

Proposal 3: Promoting effective laws through accreditation

As a lessee of Commonwealth land, AAL is accustomed to operating within a more complex Commonwealth/State legislative framework where, in numerous areas, regulations overlap or present inconsistencies that offer challenges in their interpretation and implementation.

AAL therefore welcomes the proposal to implement a single simplified standard across both tiers of government, anticipating it will offer clarity and consistency to both AAL and Kaurna traditional custodians during the engagement process.

Proposal 4: Specifying standards for 'effective' protection

It is AAL's intent to liaise proactively with the Kaurna people and seek an agreement covering both airport sites on heritage protection. To this end, AAL has engaged a specialist archaeological consultant to facilitate the process commencing early next year.

AAL believes that early engagement with traditional custodians is necessary and appropriate in the planning phases of project or development that could affect an indigenous heritage area. Whilst archaeological surveys have yet to uncover Kaurna objects of significance, AAL will pursue an agreement that I anticipate will offer certainty and transparency for both AAL and the Kaurna traditional custodians in the development and management of our airport leases and heritage objects into the future.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Phil Baker', written over a faint, illegible stamp or background.

Phil Baker
Managing Director
Adelaide and Parafield Airports