

# Submission to the draft Australian Heritage Strategy Consultation



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1. We congratulate the Department of the Environment for leading a respectful and well scheduled heritage strategy development process. Commissioning essays to inform discussion and three consultation opportunities at different stages in such a process is fundamental to the shaping of good policy/strategy and is very much appreciated.
2. Results of the first two consultations are evident in the draft Australian Heritage Strategy (draft Strategy). Prominent amongst these factors are:
  - a. recognition of the centrality of Indigenous involvement in any cultural heritage formation in this country
  - b. recognition of the vital role communities play in the field of cultural heritage
  - c. exploration of new research techniques for understanding heritage values, presumably including objects and collections
  - d. prioritisation of thematic studies of heritage places and presumably objects
  - e. support of the Federation of Australian Historical Societies to strengthen local capability and engagement with our collective heritage, presumably including objects
  - f. Australian Government leadership as one of three overarching themes, and “Greater heritage policy & process alignment across all levels of government” under the second of the three themes
3. Our earlier submissions, particularly the completed tripartite template of the second consultation round and Green Army response, provide specific future-looking ideas which remain relevant. Our submissions from 15 and 24 January 2014 are available here: <http://www.significanceinternational.com/Resources/Submissionsandgrantresults.aspx>.<sup>1</sup>
4. We wish to use this final opportunity for input to the draft Strategy to return to the main themes of our first round submission on 15 June 2012,<sup>2</sup> updated in response to the draft Strategy and the allied 2013 National Cultural Policy (NCP).<sup>3</sup>
5. While communities are well recognised in the draft Strategy there appears to be a concomitant expectation that they will carry the bulk of Australia’s national heritage into the future, with further training through the FAHS or the Green Army, hopefully in partnership with innovative business.

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<sup>1</sup> For website content regarding successful projects called for in the draft Strategy we suggest mining Australian Government Grant Program project outputs.

<sup>2</sup> Available at: <http://www.significanceinternational.com/Resources/SubmissionsandGrantResults.aspx>

<sup>3</sup> Available at: <http://creativeaustralia.arts.gov.au/>

6. While there would be some great successes within this ideal formation, we submit that this thinking is not robust for the following reasons:
  - a. Australians thoroughly engaged with heritage are mainly older people motivated by their local history/identity. The tremendous volunteer effort to keep many heritage organisations going is already the backbone of Australian heritage. It is questionable whether they can dig any deeper to resource national visions in the shrinking economy they are now experiencing.
  - b. there is a crisis of these 'knowledgeable' older custodians ailing and dying before their knowledge is tapped and recorded to enable the proper assessment of significance.
  - c. the idea of connecting young people with these older 'knowledgeable people' as part of the Green Army is potentially good, however, we have not seen alertness to this information gathering role amongst Green Army descriptions to date.
  - d. many community heritage organisations are not 'historical societies', but rather clubs or archives (often within other larger businesses). Arguably, these organisations most need identification and direction.
  - e. 'convergence' research shows our brains, relationships and communities are changing to devalue traditional conceptualisations of the past and of place.
7. Similarly concerning is the framing of Indigenous Australian engagement with heritage. The Strategy provides an unprecedented opportunity to fully tap unique aboriginal conceptualisations, for example, of landscape (collapsing space and time) and significance,<sup>4</sup> as per 2c, but is insufficiently detailed.
8. A major reason for these simplifications in the draft Strategy derives from pre-existing institutional infrastructure (including legislation and buildings), which upholds nineteenth century conceptualisations of heritage as product not process.
9. A related reason is the traditional role of government in having to manage assets and equitably account for public expenditure on this accreted heritage infrastructure – a complicated task in itself especially in our federated structure.
10. It is therefore frankly perplexing why the 2011 *Australia State of the Environment Report* (SOE) did not find our legacy heritage management system a major challenge to the future of heritage in Australia. (This may well be due to the continued use of the disputed DPSIR (driver-pressures-state-impact-response) framework, which excludes actors/stakeholders.<sup>5</sup>)
11. It is especially impressive then that the draft Strategy, coming out of the same department which produces the SOE reports, recognises the necessary and supremely important role of Australian Government leadership and the need for "greater heritage

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<sup>4</sup> As recommended in the Commonwealth of Australia 2009 *Report of the Review of the Protection of Movable Cultural Heritage Act 1986 and Regulations 1987*. Recommendation 12. Available at: <http://arts.gov.au/topics/public-consultations/submissions/review-pmch-legislation/report-outcomes-review>

<sup>5</sup> For example see E.R. Carr, P.M. Wingard, S.C. Yorty, M.C. Thompson, N.K. Jensen and J. Roberson 2007 'Applying DPSIR to sustainable development' *International Journal of Sustainable Development & World Ecology* 14: 543-555. Available at: [http://edwardrcarr.com/Publications\\_files/Carr%20et%20al%20Applying%20DPSIR%20to%20Sustainable%20Development.pdf](http://edwardrcarr.com/Publications_files/Carr%20et%20al%20Applying%20DPSIR%20to%20Sustainable%20Development.pdf)

policy and process alignment across all levels of government” – providing this is not only geared to business (as per the rationale for the ‘one-stop-shop’), but to all Australians.

12. However, in precisely the same way that the National Cultural Policy ‘*Creative Australia*’ (NCP) is more accurately identified as a ‘Commonwealth Arts Policy’, so the proposed National Heritage Strategy as it stands would more accurately be identified as a ‘Commonwealth Places Strategy’.
13. Each document starts with broad respective definitions of culture and heritage. Each promptly reduces its purview to a narrow band within those definitions, while harnessing the ambiguity of the term ‘national’ to create an illusion that all of Australia is being considered.<sup>6</sup>
14. Chief amongst the reductions in both documents is movable cultural heritage (MCH) - objects, specimens, archives, collections – which, numerically speaking, is the largest proportion of any nation’s heritage.
15. Bureaucratically, MCH is currently located in the Ministry for the Arts, Attorney-General’s Department, where it is managed/protected only if it is officially proposed for export or is fortunate enough to be housed in a ‘National’ collecting institution (mainly in Canberra).
16. Legally, MCH “across Australia”, is located in the Department of the Environment via the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and *Regulations 2000*. MCH should therefore be reported upon in the *Australia State of the Environment* (SOE) Reports on that legislation.
17. But, the 2011 SOE Report omitted MCH, for the first time since reporting began in 1996.
18. This concerted treatment of MCH between the NCP and the draft Strategy appears designed to make MCH – one of the traditional three legal/material divisions of heritage (movable, place-based, natural) – an orphan.
19. Australians might reasonably expect a mapping of the elements of heritage in the Australian Government landscape in their national heritage strategy, with some strategies for future work in each area, even if these are currently unfunded.<sup>7</sup>
20. What has made MCH so unloved in Australia - especially at time when it most needs help and when we already have agreed national standards and a very successful significance assessment methodology for objects and collections in place, and we’re now able to efficiently and effectively define the ‘distributed national collection’?<sup>8</sup>

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<sup>6</sup> ‘National’ with a capital ‘N’ essentially refers to Commonwealth matters, in this case Commonwealth owned property; ‘national’ with a small ‘n’ implies comprehensive coverage of definitions of heritage and geographic zones. Clear use of title case and lower case versions of this word in all government documentation would save much confusion.

<sup>7</sup> Like the Australian Government’s *2011 Strategic Roadmap for Australian Research Infrastructure*, which presents careful thinking about the areas in which to focus research and innovation resources as and when they become available. See: <https://education.gov.au/strategic-roadmap-australian-research-infrastructure>

<sup>8</sup> *National Standards for Australian Museums and Galleries* Version 1.3 (2013) Available here: <http://tinyurl.com/NSFAMGv1-3> (with taskforce members in each state and territory, and being endorsed by the museum and gallery industry councils (CAMD, CAAMD), these are agreed standards with genuine ‘national’ coverage); and *Significance 2.0: a guide to assessing the significance of collections* (2009) here:

21. Without well documented object/specimen/archive/data collections it is impossible to reliably determine most forms of significance for most natural and cultural places.
22. We also have international obligations regarding our objects and collections.<sup>9</sup>
23. The one item of movable cultural heritage specified in the draft Strategy (Flinders map) is not legally owned by Australia and was not created here. Unfortunately, its inclusion only serves to display:
  - (i) contravention of good collection management practice which advises collecting organisations against arranging long-term loans;
  - (ii) a persistent Eurocentric perception within Australia; and
  - (iii) the influence of certain lobby groups.

How much time, effort and money can we afford to expend on a single object?

24. Our greatest concerns with the draft Strategy lie with the inadequate positioning of heritage to prepare for an uncertain future.
25. It is now acknowledged,<sup>10</sup> including within government,<sup>11</sup> that the material and growth foci of 'modernist' society need to be redressed for the benefit of future generations.

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[www.environment.gov.au/heritage/publications/significance2-0/](http://www.environment.gov.au/heritage/publications/significance2-0/) and the original online design here:

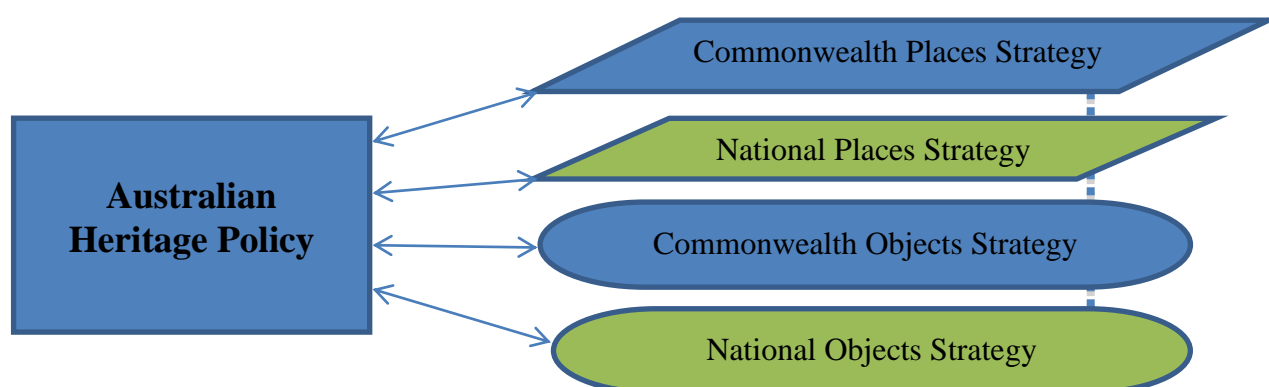
<http://pandora.nla.gov.au/pan/112443/20101122-1236/significance.collectionscouncil.com.au/index.html>

<sup>9</sup> Amongst others, Australia has ratified the following UNESCO legal instruments relevant to movable cultural heritage: (a) 'Convention concerning the Protection of the World Cultural and Natural Heritage 1972', which our *EPBC Act 1999* references. At s528(b) 'place' is defined as: "a building or other structure, or group of buildings or other structures (which may include equipment, furniture, fittings and articles associated or connected with the building or structure, or group of buildings or structures)". In the *EPBC Regulations 2000*, there are references to relevant cultural objects e.g. at 10.03 m (i) and (ii). There are also many references to living and dead biological entities in the Act and Regulations which may need to be identified with reference to herbaria etc. Similarly the 2009 [Australian Government Guidelines for the Assessment of Places for the National Heritage List](#) (page 27) includes advice on addressing the criteria such as: "the place is of national significance to Australia because it could provide information from records, collections, fossils, biological material, geological features, movable cultural heritage, archaeological resources, architectural fabric or other evidence for the understanding of: c. the natural history of Australia, and/or c.2 the history, ways of life, and/or cultures in Australia"; (b) the '[Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property 1970](#)', which our *Protection of Movable Cultural Property Act 1986* and *Regulations 1987* references, and which at 5b calls for the up to date keeping of a list of "important public and private [movable] cultural property"[currently this list is constructed by default rather than in an organised fashion as is implied in the Convention]; and (c) the 'Convention for the Protection of Cultural Property in the Event of Armed Conflict 1954', which calls for the protection or removal of threatened objects/collections. This Convention is now taken to cover catastrophic events of any kind. Australia has no specific legislation for movable cultural heritage in this situation, however Blue Shield Australia was established under the umbrella of the [International Committee of the Blue Shield](#) announced in the Second Protocol to this Convention, which comprises senior representatives of archives (ICA), libraries (IFLA), museums (ICOM), and places (ICOMOS) to provide coordination in the event of emergency. BSA advocates for disaster preparedness, prevention, response and recovery but is hamstrung by lack of resource. There are many studies which show that re-connecting with heritage aids people recovering from catastrophe. e.g. <http://www.umass.edu/chs/news/conference2014.html>

<sup>10</sup> M. Sandel 2012 *What money can't buy: the moral limits of markets* Farrar, Straus, and Girou New York. Also interviewed by Fran Kelly on ABC RN Breakfast 23 May 2013: <http://www.abc.net.au/radionational/programs/breakfast/what-money-cant-buy-michael-sandel/4707948>. Many Australians are urging the same engagement e.g. B. Douglas (ed) 2013 *Placing global change on the Australian election agenda: essays on vital issues that are being largely ignored* Australia 21 Canberra: <http://www.australia21.org.au/media-archive/placing-global-change-on-the-australian-election-agenda/#.U3byhRD4Rm4>. See also J. Dryzek 2000 *Deliberative Democracy and Beyond: liberals, critics, contestations* Oxford University Press Oxford.

<sup>11</sup> [Australia to 2050: Future Challenges](#) ('intergenerational report') Attorney-General's Department 2010; [Treasury's Wellbeing Framework](#), Department of Treasury 2012; [Sustainable Australia Report 2013: conversations with the future](#), National Sustainability Council, established by the Department of Environment 2012; the 2014 Federal Budget.

26. Heritage is well placed to draw attention to questions of past, present, and future, diverse perspectives, ethics, process, and conflict resolution – the contexts in which heritage products are embedded.
27. We respectfully and hopefully make the following suggestions for the final stage of this process:
- A. That a decision be made as to the true scope and purpose of this document, and that this be reflected in its accurate titling.
    - a) If the decision is to provide a heritage strategy for all types of heritage around the country then the 'Australian Heritage Strategy' will have to be substantially revised to demonstrate this.
    - b) If the decision is to provide a heritage strategy for government owned heritage places, for purposes of clarity and responsibility, all-inclusive language (including the definition of heritage) must be removed to another overarching document, and the title changed to reflect this.
    - c) In either case, each element of heritage should be mapped, perhaps via an online ontology, such as at Figure 1.



**Figure 1. Indicative ontology of Australian heritage policy and strategy.**

This heuristic device is not comprehensive. For example, another heritage element might be Indigenous. Strategies might be slim and would require updating every five years, in line with policy review schedules. They should contain realistic short, medium, and long term agreed objectives and the mechanisms for achieving them - similar to how an organisation's Operational Plan mirrors the Key Performance Indicators in its Strategic Plan. Emergency arrangements for heritage places and objects should be an integral part of each strategy. Evolving relevant public policy (including legal instruments), bureaucratic structures, responsibilities, accords, and all relevant "cultural and natural evaluators" should be mapped within the heritage family e.g. ICOM, ICOMOS, IUCN, ICA, IFLA. For guidance, the 1998 'National Conservation and Preservation Policy and Strategy: Australia's Heritage Collections' would be of some use in this work. Please see resources at: [http://www.collectionsaustralia.net/sector\\_info\\_item/25](http://www.collectionsaustralia.net/sector_info_item/25)

- B. That heritage as process and enabler be understood, clearly communicated and promoted in each document, and that appropriate and reasonable measures be devised to achieve this more positive worldview.

To kick-start and coordinate this mapping and interpretation process we propose the appointment of a suitable Chief Heritage Champion until 2020.

**Thank you for the opportunity to contribute to the draft Australian Heritage Strategy consultation. It is a step in the right direction.**