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Australian Heritage Strategy
Heritage Branch
Department of the Environment
GPO Box 787
CANBERRA ACT 2601

Via email: AusHeritageStrategy@environment.gov.au

Dear Sir / Madam

A Strategy for Australia's Heritage

Thank you for providing the Heritage Council of Victoria (Council) with the opportunity to have input into the draft 'A Strategy for Australia's Heritage' (Strategy).

The Council is an independent statutory body established under the *Heritage Act 1995* (Victoria). The Council's functions include determining which places and objects are included on the Victorian Heritage Register, advising the Victorian Minister for Planning on cultural heritage issues and promoting public understanding of Victoria's cultural heritage.

Overall, the idea of preparing an overarching Australian Heritage Strategy is admirable. However, the current draft Strategy fails to provide a clear vision or holistic framework for the management of Australia's heritage. The Council feels that there are a number of omissions from the Strategy. The most significant are detailed below:

- The Strategy fails to adequately address the issue of maritime heritage.
- The Strategy gives little consideration to the place of Indigenous heritage and fails to set out a strategy for the recognition of this significant part of our heritage or the exploration of shared values
- The Strategy does not clearly articulate how the Federal Government and States will work together to identify and manage significant heritage places or clearly outline the role that will be played by Local Government. The Strategy should provide a framework to encourage co-operation between all levels of government
- The Strategy fails to clearly articulate how the 'Green Army' will provide appropriate training and career paths for participants

The Strategy fails to adequately address the role of the Australian Heritage Council or to identify a role for the Heritage Chairs and Officials (HCOANZ)

The Council also has concerns about the material that is included in the Strategy. The Council has broken its comments into two sections. The first deals with 'Broad Observations' about the Strategy's contents. The second provides more specific feedback.

Broad Observations

Improve National leadership

It is encouraging to see the Strategy identify improved support for 'Australia's Iconic World Heritage Sites'; however, this commitment needs to be extended across all parts of each of the 19 sites on the World Heritage List (WHL). The Commonwealth Government's recent application to UNESCO to remove significant areas from the registration of the Tasmanian Wilderness World Heritage Area fails to recognise the exhaustive process of assessment that was undertaken by UNESCO prior to the inclusion of the additional areas on the WHL in 2013 and clearly undermines the Strategy's stated objective of promoting Australia internationally as a 'world leader in heritage management'.

As indicated, the Council is concerned by the failure of the Strategy to adequately address the issue of maritime heritage. The Council suggests that a commitment to completing the review of the *Historic Shipwrecks Act 1976* and subsequent ratification of the UNESCO Underwater Heritage Convention 2001 would go some way to addressing this omission and also be consistent with the Strategy's aim to 'contribute to international heritage standard setting and guidance'.

The identification of additional sites for inclusion on the WHL should be encouraged. The Council notes that the Strategy specifically mentions the Queen Victoria Market as a place that is worthy of consideration for the WHL. The Council recognises the importance of the Queen Victoria Market to the state of Victoria; however, the market site is not included on the National Heritage List (NHL) and no assessment of its values at a national or international level has been commenced.

In contrast, there are several other sites currently included on the NHL where the preparatory work towards inclusion on the WHL has already started. Within Victoria, the Council notes that a draft nomination in relation to the inclusion of the Victorian Goldfields was submitted to the Commonwealth Government in 2008. In addition Budj Bim Cultural Landscape (Budj Bim) in South West Victoria is recognised as one of the world's largest and oldest aquaculture systems, and has been identified as a priority by Victorian Government heritage agencies for inclusion on the WHL. The Gunditjmara traditional owners (represented by the Gunditj Mirring Traditional Owners Aboriginal Corporation) have actively sought recognition of Budj Bim's universal cultural values and have undertaken a comparative analysis to determine suitability of Budj Bim for the WHL. This concluded that Budj Bim has internationally significant heritage values not currently reflected on the WHL, and if included, would be the first Australian World Heritage site to be inscribed exclusively for its Indigenous cultural values.

The Council believes that the Commonwealth Government should support the Gunditjmara in completing a nomination of Budj Bim for inclusion on the WHL. The Council notes that the development of such a nomination would be consistent with the Strategy's stated aim to 'Pursue greater recognition and protection of ... Indigenous cultural heritage'.

Pursuing Innovative Partnerships

The Council notes the Strategy's objective to 'Pursue innovative partnerships'. However, rather than simply pursuing partnerships, the Council believes that the Commonwealth Government has a critical role to play in providing leadership in relation to, and co-ordinating the identification and management of, Australia's heritage places. The Strategy makes no mention of HCOANZ; yet, this body is ideally placed to assist in the co-ordination of state – based heritage activities and the development of consistent policy and processes. The Council believes that the Commonwealth Government should work with HCOANZ to implement the introduction of an agreed national quality framework. The commissioning of a comparative study into international best practice in relation to heritage management would be an excellent first step. Once completed, the framework could assist in the Strategy's objective of 'contributing to international heritage standard setting and guidance'.

The Council welcomes the Strategy's commitment to provide 'additional support ... to the Australian Heritage Council to help assess our national heritage and advise on its protection', but is concerned that this commitment to national leadership has been compromised by the Commonwealth Government's recent proposal to delegate responsibility for the management of significant heritage sites to the States. The Commonwealth Government is best placed to manage heritage sites that are of significance at a national and international level. The Australian Heritage Strategy should play a leading role in this process.

The Green Army program has the potential to engage a broader cross section of the community with the management Australia's heritage places and to provide much needed support to the managers of heritage places. The Council is, however, concerned about whether participants will be suitably qualified to undertake the work. In this respect it notes that the Green Army Program Guidelines do not require projects to be supervised or guided by a heritage professional and / or skilled tradesperson. Green Army volunteers should work alongside appropriately trained heritage professionals, rather than being seen as a cost-effective alternative to them.

In 2012 the HCOANZ commissioned a report from the Construction and Property Services Industry Skills Council into heritage trades training. The report produced a number of recommendations to address the availability of a skilled workforce to ensure the proper maintenance, renovation, restoration and conservation of heritage buildings. The recommendations from the report should be considered under the Strategy's aim to 'Building heritage capacity through workforce support, education and training'.

The Council acknowledges the potential for greater collaboration between the heritage and tourism sectors. The responsible promotion of Australia's heritage assets is to be encouraged, provided that the development of significant heritage sites does not compromise their natural or cultural heritage values. The Council recently made an

extensive submission to the Victorian Government's Parliamentary Enquiry into Heritage Tourism and Eco Tourism about how such co-operation can be encouraged. A copy of this submission is available on request.

The Strategy fails to recognise the link between heritage and sustainable development, in safeguarding our natural, indigenous and cultural heritage. The Federal Government should provide clear leadership in this direction, developing a policy for the sustainable management of Australia's monuments, historic buildings and landscapes. The underlying theme of the policy should stress the value of retaining, and, where it is possible and right to do so, re-using existing structures and materials. Sustainable development has been defined as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs" (World Commission on Environment and Development). The Heritage Council supports development and adaptive re-use which meets the needs of today without compromising the ability of future generations to understand, appreciate and benefit from Australia's heritage.

Encourage communities to understand and care for their heritage

The Council recognises that engaging relevant communities with heritage and the management of heritage assets is critical. However, the Council questions whether, given that there does not appear to be any funding from the Commonwealth Government for the implementation of the Strategy this goal is practical.

While there is no apparent Commonwealth Government funding attached to the delivery of the Strategy, the Council notes the proposal that funding for heritage programs and projects be 'crowd sourced'. The Council appreciates the need to be innovative in the search for funds, but is of the view that the Commonwealth Government has a fundamental responsibility for funding the management of Australia's cultural and natural heritage. Crowd sourcing is only likely to play a minor role in the funding mix.

The Council does, however, suggest that there are other innovative funding options available to the Commonwealth Government - the provision of seed funding, tax deductions / concessions and the exploration of a green star system which recognises the embodied energy and cultural heritage significance of our existing building stock all hold the potential to release considerable funding from other sources.

Specific Comments

The document contains a number of other specific omissions and / or inconsistencies. The more significant of these are:

The use of images in the document is problematic. They are not captioned and in some cases have limited or no relevance to the accompanying text.

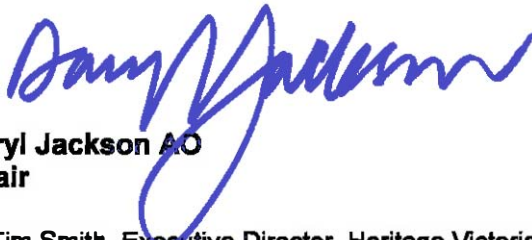
A number of the proposed 'actions' are very specific and sit uneasily within the context of a national strategy – in particular, the commitment to 'work co-operatively with the United Kingdom Government to secure on long term loan Matthew Flinders original 1804 map of Australia', while worthwhile is not a strategic action and should be deleted.

Clarification is required on the alignment of the Strategy with *Creative Australia*, the Commonwealth's Government's 2013 cultural policy

Once again, I would like to thank you for allowing the Heritage Council of Victoria the opportunity to provide comments on the Strategy.

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Yours sincerely



Daryl Jackson AO
Chair

cc Tim Smith, Executive Director, Heritage Victoria

05 JUN 2014