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9th June 2014

Australian Heritage Strategy Submissions
Heritage Branch
Department of the Environment
GPO Box 787
Canberra ACT 260
Email: AusHeritageStrategy@environment.gov.au

Submission – Draft Australian Heritage Strategy 2014

Dear Sir/Madam,

Thank you for the invitation to provide a submission on the Draft Australian Heritage Strategy 2014.

I am an archaeologist and geoscientist with over 30 years' experience working in the cultural heritage sector (Aboriginal and historic heritage) in Australia, in both the public and the private sector and in relation to local to world heritage. I am a long term member of Australia ICOMOS. I have also a strong interest in, and commitment to, the management of Australia's natural heritage. In relation to this area, I have served on the Tasmanian Wilderness World Heritage Area Consultative Committee, and on the Tasmanian National Parks and Wildlife Advisory Council, and I am a long term member of the Tasmanian National Parks Association.

Our natural and cultural heritage is an extraordinarily valuable inheritance and non-renewable asset and an Australian Heritage Strategy is potentially extremely important in ensuring that Australia's significant cultural heritage can be identified and protected. I therefore congratulate the Minister on his initiative in having an Australian Heritage Strategy prepared, and welcome the opportunity to provide comment on the draft.

Given my long perspective on, and experience in, Australian heritage conservation and management, I have some key concerns regarding the Draft Strategy. These are outlined below, and form the core of my submission.

1 Scope and Focus of Strategy

There is, in my opinion, a lack of balance in the strategy and some significant gaps, which make it difficult for the Strategy to realise the important vision set out. These are as follow:

1.1 A lack of a framework and guiding principles

While the Draft Strategy expresses well the values of Australia's natural and cultural heritage, it lacks any articulated or explicit framework or underpinnings for the care and protection of this heritage. In this sense it fails to provide direction for how most of the proposed actions and commitments will be realised.

There are well established frameworks and guiding principles for heritage in Australia, that the Australian government should be continuing to uphold, work to and promote, for example –

- The *Australian Natural Heritage Charter*
- The *Australia ICOMOS Burra Charter*
- *Ask First*
- The Precautionary Principle
- The Principle of Intergenerational Equity
- The Principle of Existence Values.¹

This underpinning creates a set of standards for heritage management and protection in Australia which are essential to steer the Strategy.

1.2 General Proposed Approach

The draft Strategy appears to suffer from a lack of clarity about what it is trying to achieve. While the vision is clear, the Draft Strategy is unclear on whether it is addressing all of Australia's natural and cultural heritage or only national and World Heritage, which is the key responsibility of the Australian Government.

Part of the issue is in the three proposed streams for achieving the vision (National Leadership, Innovative Partnerships and Community Engagement). Surely, as a national government document, the whole Strategy is about National Leadership, whereas the other streams are about a collaborative approach with the community and other levels of government, which requires a good deal more consultation with these parties to commit to these undertakings?

In my view therefore at this stage the Australian government should restrict itself to providing 'national leadership', and incorporate 'Innovative Partnerships' and 'Community Engagement' as proposed actions to develop under 'National Leadership'. I also recommend that the Government consider using the more traditional components of heritage management or conservation as the streams for realising the vision (ie, identification, assessment, conservation policy, management (& monitoring), and promoting. This will provide considerably more clarity in how the building blocks of the heritage protection are to be achieved.

1.3 Gaps

- Overall the document reads as if it were designed for addressing cultural heritage, but not natural heritage. This is evident at a number of levels (see also Balance, below), and needs to be addressed if the document is in fact about natural and cultural heritage.
- As a national level strategy I also am concerned that, while there is discussion of the National Heritage List, there is no mention of the Commonwealth Heritage List and how that heritage will be regarded.
- There is also no discussion of the heritage contained in museums. As this material is a core part of Australia's heritage, this area needs to be included or, at minimum, be referred to (as part of Australia's heritage and that it is/will be treated under a different strategy).
- If natural heritage is to be seriously considered, then it is of paramount importance that the Australian government takes the lead in addressing direct and indirect climate change issues, including via the Strategy.

¹ These and other core principles are discussed in the *Richmond Communique* (1995) and the more recent *Cairns Communique* (2012).

1.4 Balance

In my view there are a number of imbalances of concern in the Draft Strategy. These are –

- There are some worrying imbalances in terms of coverage. The key one is in relation to the treatment of the natural environment versus cultural heritage (see also above); and the other noticeable area in which this occurs is in relation to World Heritage. It is curious that two World Heritage Areas have been singled out for mention (Port Arthur and the Great Barrier Reef), but there is no mention of the other Australian World Heritage areas or, in the case of Port Arthur the other sites that make up the single serial listing. This is particularly of concern given that a number of the unmentioned World Heritage Areas are under threat, including from the actions of the Australian government (eg, the Tasmanian Wilderness World Heritage Area and Kakadu), and others, such as Heard Island, are the Australian government's responsibility and not that of a state. The Strategy therefore needs a section that clearly and specifically addresses the treatment of Australia's World Heritage Areas.
- There are very different levels of actions/ commitments in the document, for example a commitment to buying a specific historic painting compared to providing support to heritage conservation projects across Australia via the Green Army. The very specific actions, such as buying a picture or ongoing support to Port Arthur (as a specific place) should be treated at a different level to the broader commitments (either as a sub-category, or as a special stream, or as part of an Action Plan based on the Strategy).

2 Innovative Partnerships

I have particular concerns about the Draft Strategy's proposals in relation to having 'greater heritage policy and process alignment across all levels of government. While in theory this is a worthwhile aim –

- It does not acknowledge the huge amount of work that occurs at the various levels of government which, while complementary, is not necessarily able to be bundled into one package.
- I am concerned about, and do not agree with, 'developing a one-stop shop streamlining process to navigate heritage regulations' as is proposed in the Draft Strategy. Given the current debate about 'green tape' (which has yet to be a proved as a significant issue), this could be taken to be an indirect way of loosening regulations to weaken the natural and cultural heritage protections that are in place. If the intent is to genuinely remove duplication and improve processes for development approval while ensuring the heritage values of Australia are protected, then this commitment needs to be rephrased to ensure that it does this, and should be a qualified proposed action, not a commitment. It also needs to be set in a context that guarantees heritage protection will not be sacrificed. This should include various undertakings, including to 1. respect various key guiding principles (see 1 above) and include government policy (which will need to be developed) in the area of environmentally sustainable tourism and other development; 2. in terms of community and other government consultation in relation to decision making; and 3. in terms of recognising that the different levels of heritage (including at the one place) have different significances, management needs and stakeholders.

3 Innovative Funding

While it is useful to explore innovative ways of funding heritage protection, it is important to realise that many community groups and individuals already provide huge levels of financial support for heritage places and their protection, hence options such as crowd funding and local business partnerships to generate funds for heritage are limited. I would also argue that these areas are local community sources for funding and should not be used by the Australian government.

In my view the role of the Australian government in this area is to provide much needed funding directly to heritage protection from taxes, and explore efficient and shared approaches to doing this with the different levels of government. While it might be argued that the Australian government is just managing to meet its obligations to provide funding to states to manage World Heritage Areas and other places on the National Heritage List (above what the state's supply), there has been wholly inadequate funding to the natural environment to identify and assess natural heritage values, and since the demise of the National Estate Program, there have been effectively no funds provided by the Australian government to the identification and assessment of cultural heritage values generally.

The identification and assessment of heritage values is at the core of, and is the first step in, heritage protection, hence it is essential that direct funding be provided to this area. This is an area that requires professional expertise and cannot be undertaken by unskilled or semi-skilled personnel such as the Green Army.

4 Promotion and Tourism

While I have no issue with what is proposed under 'fostering greater collaboration between heritage and the tourism sector', there are two issues that need to be addressed in doing this, and which need to be addressed as part of the Strategy if tourism at heritage places is to be done responsibly:

1. All tourism needs to be explicitly environmentally (heritage) sustainable. The Strategy therefore needs to adopt or promote a policy on environmentally sustainable tourism (as there is not an Australian policy, it will need to be established), and should have regard to existing documents that promote environmentally sustainable tourism (eg, *Successful Tourism at Heritage Places* developed by the Australian Heritage Commission in 2001).
2. All heritage based tourism needs to be explicitly respectful of existing cultural values and the rights, traditions and needs of Indigenous and other local communities. The Strategy therefore needs to adopt, promote or be based on sound policy in this regard, or existing similar policy (eg, the *ICOMOS International Tourism Charter* 2002).

5 Green Army

Although it is a new name, the Green Army in general terms is not a new concept. As someone who has seen several such schemes come and go in my professional life, and their impact on heritage conservation, I have serious concerns about the capacity of such a scheme to create negative impacts on the heritage through poor training and supervision and inappropriate personnel selection, and lack of adequate resourcing.

For such a programme to achieve good heritage outcomes it will be critical in establishing such a programme to –

- ensure that there is adequate training of the workers;
- ensure that there is proper supervision of the work by staff/supervisors with appropriate professional expertise;
- recognise that many of the workers will have limited ability to do various types of heritage work (because of intellectual ability, physical capability and education), and therefore to match people's ability to the work to be done²; and
- ensure there is sufficient funding to carry out works in an appropriate manner; and
- to ensure that work is needed, and is priority work that it is in the best interest of heritage protection.

6 Recognising Achievements to Date

Although the Strategy has many good proposed actions, it fails to acknowledge that many of these are actions that are already in progress, and in some cases have been in progress for some time, including as initiatives of former Liberal Coalition governments. In my view it is important to recognise this in the Strategy as it will –

- Assist in moving forward and not re-doing good work that has already been done or is in place (hence is economically responsible);
- Assist in better relations with other potential partners as it acknowledges that they are important, active stakeholders in heritage protection;
- Assist in engaging with communities as it recognises their efforts and prior involvement and efforts (which as has been acknowledged elsewhere in the Draft Strategy, are considerable).

To this end, the Strategy should use phrases such as 'continue to ...', or "continue to support ..." where appropriate; and also needs to significantly rethink its approach to the streams 'Innovative Partnerships' and 'Community Engagement', to avoid alienating these other stakeholders and to ensure all approaches are collaborative and not simply imposed by the Australian government.

Conclusion

While I applaud the Australian government's initiative in preparing an Australian Heritage Strategy, I believe the Draft Strategy in its current format falls well short of a useful Strategy. In my view it currently has issues with focus and scope, and fails in relation to the actual strategies, commitments, and proposed actions to acknowledge the reality of what has been happening in Australia over the last 10-20 years in the area of heritage. In reality it also only makes a small number of commitments, many of which are current actions, or are very minor items (eg, buying a picture) that arguably do not belong in a strategy.

² There are also potential issues with getting people with no interest or a negative interest in heritage to work at heritage places, primarily the risks of vandalism.

To use an analogy, the Draft Strategy, has the feeling of an advertising brochure for a holiday, feeding us tid bits of an itinerary, but not advising us of all the ports of call and not actually telling us what transport we will be using and the conditions of travel, and with strong indications that they have not yet liaised and made bookings with key accommodation or travel providers at the various destinations. It's not something many people would want to commit to until there is more detail and surety.

In my view there are a number of areas that the Draft Strategy must include or address if we are all going to travel on this voyage together, as the Draft Strategy suggests.

In summary (see fuller discussion above) these are -

- The Strategy must be underpinned by standards and/or commit to developing these (eg, existing guidelines for practice, key heritage principles and policy).
- The Strategy must be a truly 'national' strategy and not encroach on the approaches of other levels of government, or community actions and resources, without clear agreement.
- The national government will also extend its national leadership to provide funds (from government monies) to the identification and assessment of heritage at all levels.
- Streamlining and innovative partnership approaches will recognise the need for environmentally sustainable practice/development and be underpinned by these; and also recognise the different values and management that are needed at different levels (and the significant contribution already being made at these different levels).
- The Strategy will commit to developing an Environmentally Sustainable Development (including Tourism) Policy (or policies) that underpin the Strategy's proposed actions in relation to streamlining processes and tourism development of heritage places.
- Use of a Green Army will be fully resourced (including with respect to training, supervision and actual works, and to employing the appropriate expertise where relevant).

Please do not hesitate to contact me should you have any questions regarding my submission.

Yours sincerely,



Anne McConnell

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