



12 June 2014

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

By email: [AusHeritageStrategy@environment.gov.au](mailto:AusHeritageStrategy@environment.gov.au)

Thank you for the opportunity to comment on the document 'A Strategy for Australia's Heritage – Draft for consultation'. We also welcomed the opportunity to participate in the Hobart-based discussion on the strategy chaired by your Department.

As the manager of three historic heritage sites that are included in the Australian Convict Sites World Heritage property and on the National Heritage List, PAHSMA has an interest in a number of the issues addressed in this document. It is also fair to say that our involvement in heritage issues through our conservation and tourism staff and Board members is such that we engage in broad heritage matters at a state, national and international level.

We welcome this draft strategy, and commend the government for progressing it to this stage, and for many of the initiatives contained within. We provide specific comment as follows:

- i. The title may better be considered 'A Strategy for Australia's Heritage Places' as there are significant parts of Australia's heritage that are not embraced in its contents, such as museums and the arts, and intangible heritage such as languages.
- ii. While the acknowledgement of the significant role of communities in heritage management is applauded, it is disappointing that there is not a concomitant recognition of the significant role played by professionals working in the area of heritage management, including tourism. PAHSMA works closely with the community in terms of our heritage

management goals and outcomes, however these are achieved in the context of the input of highly experienced and specialised professionals, tradespeople and staff across a range of disciplines. To concentrate on one and not the other suggests an unbalanced approach to the way in which heritage is managed in Australia and we are sure this is not the intent of the government.

## **1. Improve National Leadership**

- iii. We particularly thank the government for the support provided to the Port Arthur Penitentiary Project and would welcome an ongoing commitment to recognise other iconic heritage places that would benefit in following years from this level of needed and often urgent funding.
- iv. The Australian Convict Sites World Heritage listing was a first for Australia in terms of (1) number of sites (eleven, and in reality twelve) and (2) that the sites include two that are in private ownership. The Australian Convict Sites Steering Committee, of which PAHSMA has been a member since its establishment, has not achieved its intended potential and is unlikely to do so without the provision of secretariat support. The Australian Convict Sites does not exist as a single entity and without a dedicated co-ordinating function (such as an Executive Officer) is in no position to achieve the outcomes outlined in the Australian Convict Sites Strategic Management Framework. Together with the Sydney Opera House and the Royal Exhibition Building and Gardens, the Australian Convict sites is not eligible for the funding provided for secretariat support to the other 16 Australian world heritage sites under the Caring for Country Funding. We suggest that an action in the strategy under National Leadership to rectify this imbalance is needed.
- v. With respect to the two privately owned sites included in the Australian Convict Sites – Brickendon and Woolmers Estates – PAHSMA recognises that it is extremely difficult for the operating entities to apply for available funding under grants such as the Your Community Heritage Program due to the condition providing for matched contributions. We suggest that an action under the strategy be included to review this condition so that grant funding can be provided without such a requirement to heritage places on the National heritage list that are under private ownership.
- vi. We equally suggest that an action that acknowledges and commits to a sustainable level of support for AWHAC and AWHIN is an essential recognition of the significant role both entities play in protecting and managing Australia's World Heritage places and values.

## **2. Pursue Innovative partnerships**

- vii. While PAHSMA supports streamlining of permit processes we also note that the specific requirements of World and National Heritage listing may not be able to be met adequately by State and Territory government heritage resources. We suggest that this commitment in the draft strategy should be reinforced by a commitment to ensuring that referral of decision-making processes to the State and Territories is based on the provision of appropriate knowledge and expertise, particularly in the World Heritage context.
- viii. We remain unsure as to how well the Green Army model will be able to contribute to cultural heritage management, but will be committed to working with the program to promote successful outcomes. We already have a project in place with Conservation Volunteers Australia, which has indicated both the positives and challenges of such arrangements. At the same time we note the absence of an action that provides a similar degree of commitment to encouraging young people to engage in formal programs of heritage education to address a growing gap in professional heritage expertise and recommend that engagement with the university teaching and research sector should be included as a specific action in the strategy. An engagement in heritage training should not be restricted to young people working with the Green Army (this is also relevant to actions under Initiative 3 below).
- ix. PAHSMA encourages endeavours to involve Tasmanian Aboriginal people in our heritage management, and welcome an opportunity to explore how this can be progressed, noting the need for considered liaison and consultation with the Tasmanian Aboriginal community to achieve mutually desired outcomes.

## **3. Encourage Communities to understand and care for their heritage**

- x. Our experience has shown that communities care for what they already identify and understand as being important aspects of their life that they wish to retain for future generations – that is, they already understand what is ‘their heritage’. We strongly urge that this heading be reworded to recognise that different groups and communities recognise and prioritise different values and what is required is a partnership of communities and heritage interests working together to achieve a mutual understanding that there are a range of values that should be respected and cared for.

- xi. With respect to the timing for the national celebration of Australia's heritage we understand the need to review the current date. Our own challenges in participating in this celebration are exacerbated by the lack of coincidence with the National Trust Heritage Festival, which in Tasmania is run in May, not April as in most other States. We do however continue to support the coincidence with 18 April, the International Day for Monuments and Sites, and note that the proposal to consider Australia Day may not be appropriate given the disparate and conflicting opinions associated with this date by members of the Indigenous community and other Australians.

Should you wish to discuss any of the above further please do not hesitate to contact us.

Yours faithfully



**STEPHEN LARGE**  
Chief Executive Officer