



### **Australian Committee for IUCN (ACIUCN) comments on the Draft Australian Heritage Strategy.**

Representatives of the Australian Committee for IUCN (ACIUCN) together with representatives of the Australian Committee for ICOMOS met with senior officials of the Department of the Environment on Wednesday 28th of May to discuss the Draft Australian Heritage Strategy.

The following are points made by ACIUCN representatives at the meeting. They will be forwarded to the Department as the views of the experts present during this process, but do not purport to represent the views of all ACIUCN members. A truly ACIUCN viewpoint could only be obtained by a comprehensive survey of all IUCN members and would be difficult to generalise across our broad spectrum of members.

Hence we are leaving individual members of IUCN to put in their own submissions but circulating these comments to assist members should they be planning to have input into this process.

#### **General points**

- The Minister's preamble outlines an ambitious picture of a nation committed to its natural and cultural heritage. However the strategy and in particular the actions do not match the goals enunciated by the Minister. The strategic directions are general with key elements missing and the actions are limited to particular initiatives, largely related to election commitments.
- The design of the paper is not easy to read and we suggest at a minimum that the confusing inclusion of commitments and proposed actions be removed from following the Executive summary. Also specific election commitments should perhaps be labelled as because they are usually very specific and can read rather oddly.

- Generally it was felt the strategy needed to address under each broad strategic goal a. broad implementation points b. commitments including obligation in national and international law c. specific commitments and source of commitments d. other proposed actions.
- A great deal of work was done to produce documents like the *Burra Charter* and *Natural Heritage Charter*, but these are not referenced. They are widely accepted as representing best practice and the Strategy would be improved by a clear statement of commitment to them.
- Another format which would be very clear has been suggested by Pepe Clarke. See Appendix A
- The paper claims to be including natural heritage, but most of the drafts reads as if it is about specific built property. Where natural heritage is mentioned it is very place centric rather than inclusive of species and processes such as the functioning of the channel country.

### **Specific comments on sections:**

#### **What is Heritage?**

- There is no mention of the international framework for natural heritage including Australia's treaty obligations which are highly relevant e.g. Particularly under the Convention on Biological Diversity, World Heritage Convention, Ramsar Wetlands Convention, and migratory bird agreements like CAMBA, JAMBA etc.
- There is inadequate recognition of the components of natural heritage such as ecosystems, geological heritage, species, genetics etc. A definition is set out in the Australian Natural Heritage Strategy p. 8
- It says the 'the heritage strategy is focussed on heritage places' (p12). However, many places e.g. Lake Eyre are dependent on ecological processes. This approach seems to rule out any big themes such as the 'monsoon savannahs of northern Australia', the flood regime of the Murray Darling Basin.
- 'Places' also doesn't appear to cover species. Surely the survival of our unique national species – the koala, kangaroo, platypus etc. are as much a part of our heritage as any 'place'.
- The only reference to nature in the diagram is 'landscapes' is inadequate coverage of natural heritage

#### **Heritage Community**

- In naming the groups 'involved in caring for heritage' the draft acknowledges 'the National Trust and many other historical societies and groups' but there is a very notable lack of mention of the non-government environment movement p13. This would be particularly unacceptable to the many NGO members of IUCN who have been the leading organisations in campaigning for the protection and dedication of Australia's icons as protected areas and often World Heritage areas.

- There is also a lack of mention of the many specialists who maintain our natural heritage such as botanists, biologists, ecologists, geologists, speleologists,
- Also there needs to be specific recognition of all carers of natural heritage such as protected area managers, land owners involved in voluntary wildlife and Landcare conservation, private land trusts, etc.

### **A Strategy for Australia's Heritage**

- Why is heritage important? In this statement (p.15) there is a lack of some the concept of intergenerational justice – the importance of safeguarding and passing to future generations the richness of our continent's unique evolutionary history ecological systems and processes, diversity of unique species and geodiversity and deep cultural stories objects and places from ancient Indigenous culture to the formation of modern Australia since European settlement.
- We would also suggest adding 'conserving our heritage reflects our ethical acknowledgment and commitment to the intrinsic value of species and the natural world'.

### **1. Improved National Leadership**

- This is a fine goal which we would warmly endorse. However the one proposed action "Explore innovative approaches to fund the long term protection and management of Australia's heritage places" (p. 16) while supported seems an inadequate response to the idea of leadership. It suggests good intentions but no expectation of funding.
- Some suggested national strategic actions:
  - Ensure timely identification and listing of World, National and Commonwealth Heritage places.
  - Ensure future expansion of the National Heritage List is undertaken strategically; ensuring gaps in Indigenous cultural heritage are identified and prioritised for listing protection.
  - Provide continued scope for relisting places/properties to include additional Indigenous cultural heritage values.
  - Seek better integration of natural and cultural heritage values in future assessments.
  - Develop a 'Tentative List' of prospective Australian World Heritage sites in accordance with the Convention – and submit this to the World Heritage Centre.
  - Develop a public private/World Heritage Endowment Trust for research and programmatic partnerships for the management and care of heritage (see below).
  - Foster a culture of valuing, understanding and taking shared responsibility for cultural and natural heritage through the new National Curriculum and public education.
  - Support World Heritage management in developing Asian and Pacific nations.

### **Improved support for Australia's iconic World Heritage sites**

- There is silence on what will happen to current consultative bodies, AWHAC and AWHIN. Both bodies, which are established under the Intergovernmental Agreement on World Heritage, were specifically supported in the 2012 Cairns Communique –

paragraphs 47 and 48. If these bodies are not supported this should be explicit. Then there needs to be a clear commitment to how World Heritage management agencies can continue sharing information and learning and how Indigenous people whose lands are World Heritage can ensure their voices are adequately heard on issues and actions relating to their heritage.

- The Strategy should commit to the 'Framework for Best Practice Management of Australian World Heritage Properties', which is currently being prepared by AWHAC.
- The commitment to a Reef Trust is supported, but all Australia's great World Heritage areas need a clear commitment to ongoing funding. A World Heritage Endowment Trust which augmented research and programmatic partnerships for the management and care of heritage would be an outstanding example of national leadership.
- Actions are limited to the general - green army, or specific Port Arthur and GBR but there are no overall commitments to e.g. encourage research partnerships between World Heritage agencies and academic bodies though incentives such as matching grants or taxation measures.

#### **Capture a representative National Heritage list**

- There is no open acknowledgement in the Issues discussion of the very wide view that the listing process is excessively slow and cumbersome and for World Heritage prospects creates a substantial 'bottleneck'.
- The proposed action 'commit to exploring how the listing process can be streamlined' was criticised as excessively tentative and should read 'streamline the listing process' or at least 'explore how the listing process can be streamlined'.
- There would be considerable merit in tasking the Australian Heritage Council to prepare a clear 'specification' of what a truly representative National Heritage List might look like – types of place, coverage, themes, values and number of listings. This would be a valuable process which could actually ground the lofty but vague ambition as it is currently expressed in the draft Strategy.

#### **Pursue greater recognition and protection of our natural and cultural heritage, particularly our Indigenous cultural heritage**

- Again the goal is endorsed but the actions weak e.g. 'Improve the recognition and protection of Indigenous cultural and cultural heritage' is not an action, only a repletion of a broad intention.
- We support identification of Priority sites for World Heritage Listing (p17) but this should be a more systematic and inclusive process with state governments, communities and key cultural and environmental experts involved to develop a formal Tentative or Indicative list. In this regard, engagement of Traditional Owners is very important wherever landscapes are under consideration for listing, even if the rationale for listing primarily relates to natural values.
- The Indigenous component of the Strategy should address matters highlighted in the *State of the Environment 2011 Report*, such as facilitating a national peak body for Indigenous heritage, like the 'Heads of Parks' gatherings.
- Australian Government should promote State and Territory jurisdictions to align all Indigenous Heritage laws to be administered by the Environment and Heritage portfolios.

### **Contribute to international heritage standards setting and guidance**

- All actions supported but they are all very broad intentions.

### **2. Pursue Innovative Partnerships**

- The general intention to explore innovative partnerships is a common sense direction. The complex issue of the need for and realities of 'one stop shop' approaches to deal with complexity and overlap is better left to more detailed submissions. Suffice to say the general view of our experts was considerable concern around the appropriateness of relegating responsibilities for national and international issues to state governments.
- Partnerships developed following release of the Strategy should be equitable and provide an appropriate voice for Indigenous traditional custodians for Strategy actions relating to their heritage.
- There is unfortunately some room for scepticism when discussing partnership approaches when many programs which support community activity in caring for heritage have been reduced or cancelled for example the reduction in Caring for our Country and the abolition of the Grants to Voluntary Environment, Sustainability and Heritage Organisations (GVESHO). These small grants have a very substantial leverage factor and should be reinstated.
- There are already many partnerships of heritage agencies and academic organisations but a government committed to national leadership could explore ways to support or facilitate these efforts.
- **Building heritage capacity**
- The Green Army Programme is a focus for capacity building but it was stressed that heritage work in many cases is a task requiring considerable skill and knowledge and that it will be vital if heritage is not to be harmed that adequate training is built in to any programme.  
While recognising the Government's commitment to the Green Army, the Strategy is sadly silent about the value of, and any ongoing commitment to, existing community-based conservation programs including Landcare, Working on Country and Caring for our Country.

### **Innovative funding etc.**

- The need for innovative and partnerships in this generally not well funded area is clear. However there is no discussion of simple mechanisms such as tax incentives for heritage restoration and management.
- A further impediment to resourcing may be because 'heritage' is seen as a niche area of interest to a small minority. Proper promotion of our heritage as an integral part of Australian love of land and patriotism, especially from national leaders may make resource gathering partnerships more likely.

### **Collaboration between heritage and tourism**

- Tourism is undoubtedly an important force to give access to our iconic places and landscapes and to provide experiences and information to enhance understanding appreciation and a commitment to their conservation. However it is good that the 'two edged sword of tourism to heritage places is acknowledged , the fact that excessive tourism can also have negative impacts if not well managed. Therefore there should be a caveat on encouraging tourism which says 'without degrading natural or cultural values of the destination.
- Unfortunately all the actions are about promotion of these icons, rather than any comments about their protection or the need for tourism to be culturally sensitive, and ecologically and socially sustainable

### **Education and Research**

- We consider that an additional program stream should be added within the 'Innovative Partnerships' theme, seeking to pursue greater links with educational institutions, particularly through use of World Heritage properties and places on the National Heritage List, in conjunction with the new national curriculum. This should also be extended to the university sector and the need for co-ordinated and directed research outcomes. There is also strong support for the inclusion of applied research for World Heritage within the new National Environmental Science Program, which could also be highlighted in the Strategy.

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

- The goals of greater community understanding and care are supported. However while greater exposure is undoubtedly needed in new media there is little substitute for generating rue engagement and long term caring for place than great first hand experiences. Therefore visitation to our heritage places, landscapes and journeys should be widely encouraged.
- Effective management of heritage places requires a proactive program of monitoring and evaluation and therefore the Strategy should commit to such a program, using the framework already provided in the *State of the Environment 2011 Report*.

Thank you for the opportunity to engage in a dialogue and to submit these comments to the process.



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Director Australian Committee for IUCN

## Appendix A: A suggested reformatting of the strategy P.Clarke

### National Heritage Strategy | Integrating proposed strategic themes with heritage conservation outcomes

**Goal:** To conserve cultural and natural heritage values through national leadership, effective partnerships and community engagement.

**Themes:**

1. National Leadership
2. Effective Partnerships
3. Community Engagement

**Outcomes:**

1. Identification and listing of heritage places
2. Conservation and management of heritage values
3. Promotion of heritage values
4. Monitoring, evaluation and reporting

	National Leadership	Effective Partnerships	Community Engagement
Identification and listing of heritage places	<p>Ensure timely identification and listing of World, National and Commonwealth Heritage places.</p> <p>[insert proposed actions]</p>	<p>Work with heritage organisations, experts and state and territory governments to identify priorities for nomination.</p> <p>[insert proposed actions]</p> <p>Work with indigenous organisations and state and territory governments to develop</p>	<p>Promote the role of the community in preparing heritage nominations.</p> <p>Publish a community guide to heritage nomination processes at local, state, national and international level.</p> <p>Promote opportunities to nominate National, Commonwealth and World Heritage properties.</p>

		<b>improved mechanisms for identification and protection of indigenous heritage values.</b>  [insert proposed actions]	
<b>Conservation and management of heritage values</b>	<b>Ensure effective conservation and management of World Heritage properties.</b>  Fund management activities by World Heritage management bodies and relevant state and federal agencies.  Ensure robust environmental assessment of actions that are likely to significantly affect World Heritage values and effective responses to prevent degradation of values  Ensure effective conservation and management of heritage places under the ownership or control of the Commonwealth Government.  Ensure that the Commonwealth Government's management of heritage places provides an exemplar of best practice conservation management.	<b>Improve alignment of local, state and national heritage policy and programs.</b>  [insert proposed actions]  <b>Build capacity to conserve and manage cultural and natural heritage values.</b>  [insert proposed actions]  <b>Work with indigenous organisations to build community capacity to conserve and manage indigenous heritage values.</b>  [insert proposed actions]	<b>Support community efforts to conserve and manage cultural and natural heritage values.</b>  Fund heritage conservation activities through the Community Heritage and Icons Program.  Fund environmental and heritage conservation activities through the National Landcare Program.



	<p>Ensure that heritage conservation activities by federal agencies are adequately funded.</p> <p><b>Ensure effective conservation and management of National Heritage values.</b></p> <p>Fund management activities by relevant state and federal agencies.</p> <p>Ensure robust environmental assessment of actions and decisions that are likely to significantly degrade National Heritage values.</p>		
<b>Promotion of heritage values</b>	<p><b>Promote cultural and natural heritage values of National, Commonwealth and World Heritage properties.</b></p> <p>Fund heritage promotion and education activities by World Heritage management bodies and relevant federal agencies.</p>		<p><b>Support community efforts to promote cultural and natural heritage values.</b></p> <p>Fund heritage promotion and community education activities through the Community Heritage and Icons Program.</p>
<b>Monitoring, evaluation and reporting</b>			