8th July 2010

Mining Registrar
Minerals and Energy Resources Division
PIRSA
GPO Box 1671
ADELAIDE SA 5001

Dear: Ms Martin

Re APPLICATION FOR VARIATION OF PROCLAIMED AREA “BURRA MINES HISTORIC SITE AND THE BURRA SMELTER HISTORIC SITE, also known as the Monster Mine (Monster Mine Reserve)

The Burra mine site is of acknowledged heritage value. The mine site and associated physical structures and features are included on the South Australian State Heritage Register. The site is also a declared State Heritage Area. The mine site is of significance as one of Australia's earliest, largest and best-preserved nineteenth century mine sites. The mine site and surrounding township is one of the earliest examples of Cornish mining and domestic architecture in South Australia. The mine site is also fundamental in the understanding of the early history of settlement in the State, as it stimulated immigration, technological development, transport infrastructure and economic growth for the fledgling Colony in the 1840-50s.

The heritage value of Burra is also considered of international importance. The South Australian Heritage Council is currently pursuing nomination of the Burra Mine as a World Heritage Site. The Council considers that the Mine is of World Heritage value as an illustration of the trans-national influence of Cornish miners and engineers within an international context.

Australia ICOMOS represents over 500 heritage professionals in Australia and recognises the heritage values associated with the Burra Mine site. The site is also fundamentally associated with best practice heritage management within Australia and overseas. In 1979, Burra was the location of the proclamation of the Australia ICOMOS ‘Burra Charter’. The Charter provides guidance for the conservation and management of places of cultural significance. The Charter sets a standard of practice for those who provide advice, make decisions about, or undertake works to places of cultural significance, including owners, managers and custodians. The Burra Charter is referenced in government policy and is often cited internationally as a successful model for heritage management and practice.

We understand that the Mine Reserve is currently listed as a ‘Heritage Exclusion Zone’ in the South Australian Mining Act, which has allowed the site to remain undisturbed, conserving the heritage values of the significant mining landscape.

Australia ICOMOS wishes to highlight that Phoenix’s request to remove the Heritage Exclusion Zone over the Mine Reserve for mining exploration activity may put the heritage values of the site at risk. The Phoenix proposal must be measured against its impact upon the State Heritage listed values of the site and its potential World Heritage values. We recommend that the principles and guidelines of the Burra Charter be considered in any evaluation.
Despite the heritage significance of the site, a Conservation Management Plan has yet to be prepared for the site. An appropriately funded Conservation Plan, prepared by a suitably qualified and independent conservation professional, is recommended for the ‘Reserve Area’ to provide a detailed assessment of the heritage values of artefacts, the landscape and subterranean components.

The community and State Heritage Branch should be consulted throughout this process ensuring the heritage values of the place are maintained.

We trust the above comments assist in the evaluation of the application by Phoenix Copper Pty Ltd to undertake exploration activities within the historic Burra Mines Reserve.

Should you require further comment or clarification of details of this submission, please do not hesitate to contact me.

Yours Sincerely,

Susan McIntyre-Tamwoy
President, Australia ICOMOS