22 January 2014

The Australian Heritage Strategy  
Heritage Branch  
Department of the Environment  
AusHeritageStrategy@environment.gov.au

Dear Australian Heritage Strategy team,

THE AUSTRALIAN HERITAGE STRATEGY

Please find attached a submission from Australia ICOMOS regarding the proposed Australian Heritage Strategy. We thank you for the opportunity to contribute. The attached complements the issues we have highlighted in discussions at previous workshops held by the Federal Government on this matter.

We would be happy to provide more information if requested.

We look forward to the next stage of this important process and trust that you will keep Australia ICOMOS closely involved in ongoing participation in the formulation of this important strategy.

Yours faithfully

MS ELIZABETH VINES OAM, FRAIA, MICOMOS  
President, Australia ICOMOS
This completed form must be included with your input. If completing by hand, please ensure your writing is clear and legible.

### CONTACT DETAILS

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AUSTRALIAN HERITAGE STRATEGY - SUBMISSION BY AUSTRALIA
ICOMOS JANUARY 2014

Questions
Please add your comments for some or all of the three questions below. If you have other information you wish to provide, please add this in the other comments field.

1. What do you think are the key elements of the Commonwealth’s role in heritage?

Australia ICOMOS (AI) provided a previous submission on the Australian Heritage Strategy dated 14 June 2012. The following submission adds to this previous submission, and incorporates the earlier suggestions together with additional information and new ideas from our membership.
(Note There is also a separate submission by the Association for Preservation Technology (International) Australasia Chapter which is focussed on the need to create an Australia Heritage Quality Framework. )

- stress the national leadership role of the Commonwealth, especially a prominent role for the Australian Heritage Council;
- promote and facilitate national coordination and cooperation between all jurisdictions (Commonwealth, State/Territory and local governments), including clarity about and integration of management decision-making;
- support in progressing the National Listing of places which have been already recognised as having National Values (eg City of Broken Hill) and reinstate the Priority Assessment List and progress the many nominations that have been made for this important list. Progress the listing of Canberra, our national capital as a priority. Few National Heritage listings are being achieved, some assessments have been completed many years ago and still await a decision, and resources have been significantly reduced.
- recognise and support the important role local government should play regarding Australia’s heritage, and recognise that communities have a responsibility for and a right to participate in decisions affecting their heritage;
- reinforce the importance of associated stories as part of the heritage of places and landscapes;
- promote a comprehensive and integrated view of Australia’s heritage, including linkages with moveable heritage and intangible heritage;
- promote links and coordination with other strategic and policy frameworks (e.g. the proposed National Cultural Policy);
- provide a comprehensive and up to date listing of Australia’s heritage places;
- provide an integrated national database of heritage places enabling a single web-based
point of inquiry for the community and business. The database should also enable cross jurisdictional research and understanding;

- provide for a coordinated **national program of research** to respond to common heritage issues facing more than a single jurisdiction, including methodological and technical conservation issues, as well as issues regarding knowledge about heritage (e.g. thematic studies);
- promote consistent and **best-practice heritage legislation and administration across all jurisdictions**. In particular outline that the Commonwealth will take a leading role in coordinating all of the listing and regulatory agencies dealing with Indigenous heritage, similar to the current Heritage Chairs and Officials forum, especially to respond to issues identified by the 2011 State of the Environment report (e.g. erratic identification of sites, legislation provides a recipe for destruction, intangible heritage at great risk);
- provide **effective national monitoring** and reporting of identification, protection, conservation and interpretation activities, with clear feedback links to government heritage policies and programs;
- provide **ongoing substantial support for heritage training** based on a review of existing activities and needs, and guided by a national strategic framework (e.g. to respond to the need for traditional heritage skills training);
- promote **integration of Australia’s heritage into education curricula**, including education strategies and materials based around heritage places, values and concepts;
- provide **ongoing substantial support for heritage studies** (e.g. CMPs);
- provide ongoing substantial **support for physical conservation works** (including technical advice and funding support) through a package of targeted measures, based on a review of the private/public benefits, costs, need and capacity;
- **effectively integrate heritage into the Green Star** sustainability system (e.g. allowing points for heritage conservation and the embodied energy in existing structures, not just for measures of operational energy efficiency), Rating tools generally do not provide any recognition of the sustainability benefits of conserving existing buildings and the embodied energy inherent in these structures is not acknowledged. There is a risk that historic buildings will be demolished because they do not meet contemporary green standards. Systems such as NABERS, Green Star and Basix should better reflect the contribution of heritage buildings to sustainable outcomes.
- provide **ongoing substantial support** for interpretation of Australia’s heritage places, based on a review of current activities and desired outcomes, and a national strategic framework;

ICOMOS has a concern that the Federal Govt Department is **struggling with its heritage responsibilities** and is facing a funding crisis in heritage – for example, after years of attrition, the heritage staff is now about half its previous number, and what was a division is now only two branches
2. What new cooperative models could be explored to open up opportunities for heritage protection?

- there are many existing that are working well eg Advisory Services operating nationally (although these have been drastically reduced/terminated in South Australia despite acknowledged success)
- provide support for international heritage activities, especially those aimed at sharing skills and expertise, and helping other countries with their needs eg ICOMOS Pascifika
- Small grants programs for heritage places DO WORK, and these are generally no longer available. There are clearly identified multiplier effects in the local economy when these are in place
- Ratification of the 2001 UNESCO Convention for the Protection of the Underwater Cultural Heritage which would resulting in the streamlining of process and greater clarification of responsibilities with the states and Northern Territory across all underwater cultural heritage in line with the Australian Underwater Cultural Heritage Intergovernmental Agreement. Increasing protection for underwater cultural heritage by amending the Historic Shipwrecks Act enables ratification which will put in place a process for collaborative protection of our overseas underwater cultural heritage with the nearest country. Australians were heavily involved in the drafting of the 2001 Underwater Cultural Heritage Convention and the Australian Government, (also Coalition at that time) agreed to, the final wording of the convention. The convention is a direct outcome of the United Nations Convention on the Law of the Sea, (UNCLOS) and was worded to ensure complete unity with that convention. The Annex of the convention is also an almost direct copy of the 1996 ICOMOS Charter on the Protection and Management of Underwater Cultural Heritage.

- The separately outlined Australian Heritage Quality Framework would consist of Heritage Quality Measures for various heritage practices. These measures will also assist with streamlining statutory approvals and the provision of exemptions and will provide more certainty for applicants.

3. How can communities engage more effectively in the management of heritage places?

- As many studies undertaken world-wide indicate, conservation and protection of heritage places cannot be undertaken without the involvement of people closest to the resources. Therefore an approach that embraces the central role of local communities as stewards of the place should be taken. Establishment of partnerships linking the local communities, place’s management, local authorities and other stakeholders in stewardship and sustainability should be a focus.
- COMPACT (Community Management for Protected Areas Program), an initiative of the United Nations Development Programme (UNDP) / Global Environment Facility Small Grants Programme (SGP), the United Nations Foundation (UNF) and other partners is a good example of such successful community engagement. It was launched in 2000 and aims to replicate the success of SGP at the national scale for protected landscapes, including natural UNESCO World Heritage Sites and overlapping Biosphere Reserves recognized for their Outstanding Universal Value. The summary document can be found at

Local heritage issues are often of concern for communities. Having events to promote, celebrate, visit and engage with heritage places and matters in their local area is important. These may include Heritage Week opportunities, through government, the National Trust, History Council (SA), Historic Houses Trust (NSW) and other similar organisations/groups.

The community should have an opportunity to comment on major development affecting significant heritage places through organised community consultation sessions early in project planning stages by project managers, and information provided at regular intervals to interested community groups or members throughout project development to keep them informed.

Heritage Education is important particularly at the local heritage level as many of the educational kits are for state level heritage items.

It should be noted that the Australia ICOMOS Burra Charter 2014 promotes community engagement with heritage management processes, particularly Article 12.