

Comments on the inaugural *Australian Heritage Strategy*¹



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Veronica Bullock
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The inaugural strategy for Australian cultural and natural heritage was launched in December 2015. The *Australian Heritage Strategy 2015 (Strategy)* presents 11 Objectives and 51 'Proposed actions' to support Australia's official goals for heritage under 3 'high level outcomes': National Leadership, Strong Partnerships and Engaged Communities. The *Strategy's* 10-year Vision is:

Our natural, historic and Indigenous heritage places are valued by Australians, protected for future generations and cared for by the community.

As the Australian Constitution does not make heritage an area of Australian Government responsibility we are fortunate that the resounding plea for national leadership on heritage, arising from consultations between 2012 and 2015, has been heard and a national strategy produced. Consultation submissions expected the Australian Government to build on precedents of significant indirect Commonwealth involvement in heritage since 1975.^{2,3} The resulting document unfortunately evidences the inability of the Australian Government to fund the management and protection of heritage places in general and its own properties in particular.^{4,5} Community contributions are therefore encouraged throughout the document in order to share the costs (and benefits) of identifying and managing heritage places.

Currently, the natural and cultural heritage function occurs in at least ten contexts across Australian Government public policy⁶ and departmental arrangements (See APPENDIX). Yet the key diagram in the *Strategy* at Figure 1 (p. 8, see below), titled 'Australia's Heritage', is used to exclude movable cultural heritage from scope and omits natural heritage (landscape is a cultural concept). This diagram also displays technophobia and oddly aligns tangible and intangible expressions of heritage.

Most importantly, Figure 1 and the *Strategy*, are out-of-step with 21st century thinking about heritage as a form of active social inquiry capable of offering unique insights into human valuation more generally – as we have suggested in our submissions to the consultations.⁷ Concessions to the social in the document are generally couched in terms of economic, that is, material 'wellbeing',^{8,9} and places themselves are commonly termed 'assets'.¹⁰

Rather than using this unprecedented opportunity to communicate what heritage is now understood to be and to 'join up' the Australian Government heritage function towards proper articulation with larger public policy issues, such as sustainability, this *Strategy* confirms heritage in its outdated mode: as physical remnants of cultural structures. It is portentous that the term 'heritage' has now been reduced so authoritatively to mean only this.

Overall, the inaugural *Australian Heritage Strategy 2015* is disappointing because it is internally confused, favours traditional interests and, above all, does not offer a holistic understanding and treatment of heritage for Australians today – as its title suggests. With core messages of cost sharing and red tape reduction for business, ‘National leadership’ and ‘heritage’ are interpreted in instrumental rather than inspirational ways.

For these reasons we believe the *Strategy* reveals clear need for a dedicated and holistic *Australian Heritage Policy* to address the concerns raised above, towards revision of the *Australian Heritage Strategy 2015*.

We have prepared evidence and suggestions to support the above overview, which uses our usual running number with endnotes format. This focuses on two questions posed in Part 1 of the two-Part *Strategy*: ‘What is Australia’s heritage?’ (with a Box analysing Figure 1) and ‘Why do we need a strategy?’ (Part 1 of the *Strategy* positions the Objectives and Proposed actions detailed in Part 2.)

Following brief descriptions of the *Strategy*’s answers to these questions in Parts A and B of our Comments, notes towards alternative answers are provided and an outline for the next iteration of the *Australian Heritage Strategy*, including a choice of two Vision Statements, is proposed. We recommend reading APPENDIX A ‘The Distributed Australian Government Heritage Function’ prior to reading the numbered Comments below.

Policymakers are a target audience for this advice but we also hope the broader Significance International readership will find it a useful resource for focused discussion on how to better understand, interpret, support and use heritage in Australia in the 21st century.

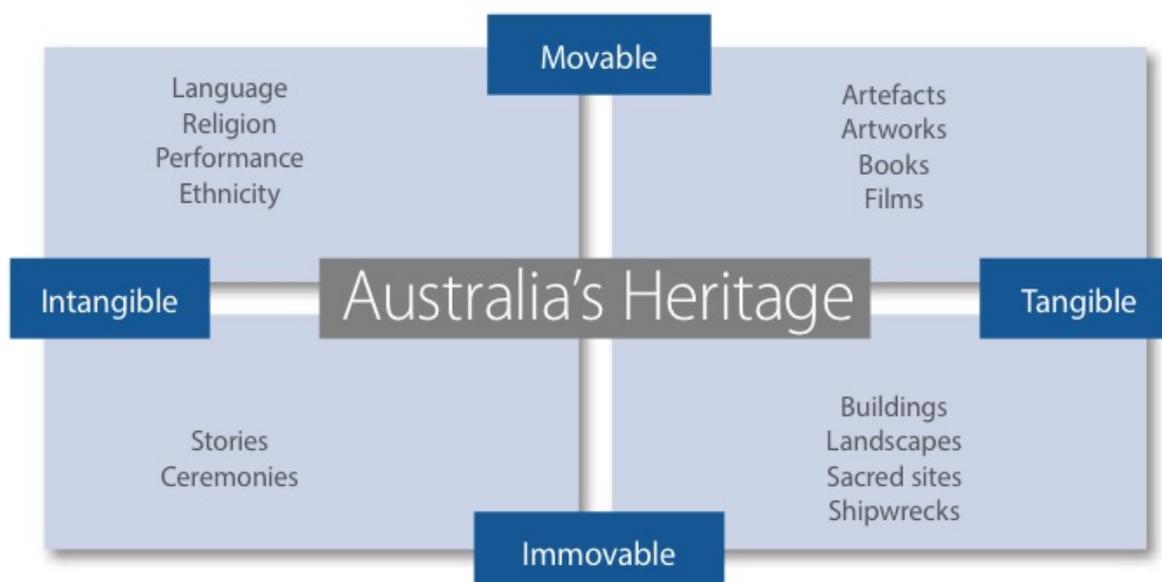
Objective 11 of the *Strategy* raises Australia’s leading role internationally in heritage theory and practice since the mid-1970s.¹¹ We propose refreshing this reputation in line with extraordinary developments by Australian heritage theorists since the turn of the 21st century, which take the ideas of ‘pluralist Australia’ and a more thoroughly ‘globalised world’ into genuine account.

PART A. 'What is Australia's heritage?'

Description of the *Strategy*'s answer to this question

1. The 'What is Australia's heritage?' section (1.1 at pp. 7-8) in the *Strategy* reiterates the language of the vision, introduces concepts of time (past, future, living, forward-looking, long term) and provides diverse examples of places.
2. The main reflection in the *Strategy* document is located here and concerns the social value of heritage in helping us to understand heritage as 'valuable community assets' that give 'context to where we are now and where we are headed as a society'. While 'the [singular] community' is sanctioned to decide which stories and events are commemorated, the 'complex process' of identifying places 'deserving of heritage protection' requires 'scholarship'.
3. The narrative builds through the mention of wellbeing to cite figures on the monetary worth of heritage via the concepts of natural and cultural capitals and jobs, and culminates in an argument to exclude objects and collections from 'Australia's Heritage'.
4. 'Australia's Heritage' is represented in a quadrant diagram (p. 8) titled 'The many facets of heritage'. This diagram is now analysed.

Figure 1: The many facets of heritage



Analysis of Figure 1

Analysis of 'Figure 1: The many facets of heritage'

- Heritage is differentiated in Figure 1 (p. 8) around two central poles: Tangible / Intangible (x axis) and Movable / Immovable (y axis). This diagram presents heritage as it may be defined for policymaking purposes i.e. it incorporates the legal dimensions of 'movable / immovable' and 'property', as well as the more academic and currently popular alternative language for physical expressions of heritage as 'tangible', and the sources that inform their creation, represent their expression or exist without material expression as 'intangible'.

- This diagram is presented mainly to explain why cultural property / objects / movable cultural heritage (MCH) is excluded from the *Strategy*. Even so, the MCH examples of ‘artefacts, artworks, books, films’ do not adequately reflect the UNESCO definition of MCH in the *Strategy* – the only context given for the diagram, just above it. Cited to include artistic, technological, historical or natural origins, examples of ‘specimens’ and ‘machines’ might have conveyed this diversity better than the overtly cultural (archaeological, artistic and historical) examples chosen. Their exclusion indicates technophobia. However, even if ‘specimens’ and ‘machines’ had been included these are also selected by or made by humans. Thus, all examples in the diagram are cultural. (N.B. ‘landscape’ is also a cultural concept.)
- Claims that MCH should be excluded from the *Strategy* are not consistent with arrangements and statements occurring elsewhere in the document however. For example, the Glossary definition of ‘place’, drawn from the Australia ICOMOS *Burra Charter* 1999, states: ‘...site, area, land, landscape, building or other work, group of buildings or other works, and may include *components, contents* [our emphasis], spaces and views’. Further, both the 1999 and 2013 editions include the category of ‘Related Object’, which means ‘an object that contributes to the cultural significance of a place but is not at the place.’^{12, 13}
- Discussions of Indigenous heritage in the *Strategy* include references to objects (pp. 37, 42), while the Australian Government supported NGO, the Federation of Australian Historical Societies, also deals with objects not necessarily directly associated with a given place.¹⁴
- We note that the 1999 edition of the *Burra Charter* is cited in the *Strategy* rather than the (only subsequent and) most recent 2013 edition. This is significant because the 2013 edition is more open to including objects in its definition of place.¹⁵ This confirms a tendency to align the 2015 *Strategy* with outdated professional guidance.
- A flaw within the diagram is that the intangible expressions of Movable are aligned with ‘language, religion, performance, ethnicity’, whereas ‘stories, ceremonies’ are aligned with the Immovable examples of ‘buildings, landscapes, sacred sites, shipwrecks’. In reality, each of the intangible expressions may be associated equally well with each of the tangible examples given, regardless of whether they are movable or not (indicative of movable / immovable heritage as a continuum¹⁶). At minimum, to make sense, we therefore suggest that the Movable / Immovable labels should not straddle the Intangible quadrants in future iterations of such a diagram.¹⁷
- To conclude, Figure 1 evidences disjuncts between parts of the *Strategy* text and their interpretation in the diagram on the one hand and with the content of cited professional guidance on the other. The diagram sits poorly with the stated ‘cultural and natural heritage’ frame of the document – even if ‘natural heritage’ is defined only in terms of the UNESCO World Heritage Convention / National Heritage List, rather than as the total inheritance of nature. Overall, Figure 1 is not a fair contemporary representation of ‘Australia’s Heritage’.

Notes towards an alternative answer to ‘What is Australia’s heritage?’

5. A question like ‘What is Australia’s heritage?’ would normally drive the formulation of policy (what?) not strategy (how?), in this case for an ‘Australian Heritage Policy’.
6. Similar policy prompt questions like ‘What is heritage?’ and ‘Whose heritage?’ have been asked increasingly since the exposure of heritage as a commodity of ‘the historic environment’, particularly in Britain from the 1980s (Hall 2000; Hewison 1987; Samuel 1994). These critiques have established heritage as a fruitful field of social inquiry able to contribute answers to fundamental questions like ‘Why do we value certain entities and not others?’ (Brown 2015; Winter 2013; Harrison 2013; Taylor and Lennon 2012; Smith and Akagawa 2009; Byrne 2008; Smith 2006).

7. Such questions and answers are becoming especially important as attempts are made to understand why, for example, people still disagree about such things as climate change despite scientific consensus (Hulme 2009).
8. Following this example, and given that heritage is intimately tied with environment in the *Strategy* (through the EPBC Act 1999, See APPENDIX), we may well ask why natural heritage is so marginally represented in it (e.g. in Figure 1, p. 8) and why heritage contributions are not proposed towards collaborative efforts to address such large and persistent conservation-development challenges as sustainable development – a recognised interdisciplinary field (Bammer 2012; Brown, Harris, and Russell 2010).
9. We may also ask why the Australian Government presents funding to environmental science as spending on natural heritage in the *Strategy*, when it is presented to scientists as non-heritage related.^{18, 19} Is it to boost the appearance of funding to heritage? (Environmental science research funds are many times greater than any funds mentioned for cultural heritage purposes in the *Strategy*, and no new funds are announced in the *Strategy* at all).
10. We propose that such outcomes reflect the scaling back of Commonwealth support for heritage, particularly cultural heritage, since the 1990s.^{20, 21}
11. The framing of heritage in *Australia, State of the Environment* Reports also indicates a bias to the natural environment.²²
12. When environmental science findings are interpreted in terms of such economic concepts as ‘assets’, ‘natural capital’ and ‘cultural capital’ (pp. 1, 7, 12, 13, 17, 22, 24, 34, 41, 48) to yield economic ‘wellbeing’ (pp. 3, 6, 7), amidst figures demonstrating the dollar value return to the economy of a preordained heritage narrative (pp. 3, 7, 8, 12, 18, 31, 38), it is difficult to see how the full range of community voices can genuinely contribute to valuing Australia’s diverse heritage – as also encouraged in the *Strategy*.
13. Thus, while the Australian Government’s approach to heritage is based on values, as recommended in Australian heritage theory and practice, we must finally ask ‘Should the Australian Government attempt to make all Australians adopt its preferred value set?’²³
14. To conclude, Section 1.1 addresses only part of the vision statement of the *Strategy* itself and generally confirms its instrumentality and expert basis. It does not present a balanced, contemporary or properly reflective answer to the question posed in the section title: ‘What is Australia’s heritage?’

PART B. ‘Why do we need a strategy?’

Description of the *Strategy*’s answer to this question

15. The ‘Why do we need a strategy?’ section (1.3 at pp. 12-13) in the *Strategy* is about the best management of accumulated, expert-designated ‘heritage assets’, for reasons of sharing the costs of identifying and maintaining this inheritance (‘shared responsibility’ (pp. 9, 13, 35)²⁴ between governments, community and business), and for celebrating, commemorating, protecting and benefitting from them.²⁵

16. This discussion identifies a comparatively poor Indigenous heritage database for *Australia, State of the Environment (SoE) Reporting* purposes and prioritises documentation and protection of this domain of heritage.

Notes towards an alternative answer to 'Why do we need a strategy?'

17. Our review at Part A showed that the *Australian Heritage Strategy 2015* represents only one incomplete aspect of Australia's heritage which is based in physical manifestations²⁶ and is locked in to an expert environmental reporting frame.
18. The Commonwealth approach to environment and heritage is ultimately underpinned by the Australian Constitution, which does not make either area a Commonwealth responsibility (Australian Government Solicitor 2010). Community expectations of Australian Government involvement in environment and heritage rose in the 1970s when the Australian Government aligned Australian law with international agreements (e.g. UNESCO and UNEP Conventions²⁷). Thenceforward, parts of the Australian Constitution, notably the 'external affairs' power at section 51 (xxix),²⁸ were able to be used by the Australian Government to support the efforts of the new (environment and heritage) conservation social movement.²¹
19. At minimum an inaugural heritage strategy for Australia presents an opportunity to holistically map the existing Australian Government heritage policy architecture while indicating the relatively minor Constitutional responsibilities of the Commonwealth in regard to heritage and proposing a proportional range of discrete initiatives to reflect this distributed reality. (The fragmented departmental responsibility aspect of this architecture should be de-emphasised.)
20. As submissions to the three Strategy consultations called resoundingly for national leadership on heritage, and given that national governments are resourced to develop model policies for their countries, a more generous response would be for the *Strategy* to provide national leadership by demonstrating how to creatively link up the identified pockets of heritage within its own policy architecture.
21. If informed by contemporary theory such policymaking could transcend inherited economic and environmental instrumentalities and the co-option of emotion ('our', 'future generations') designed to steer Australians toward a single, preferred set of values. It could provoke inspirational thinking and genuine community connections in keeping with 21st century expectations.
22. Given the 'wicked' problems that Australian Government policymakers acknowledge they have faced since at least 2007 (Australian Government 2007) we argue that it is necessary for the Australian Government to put heritage policy to work for larger social agendas.²⁹ Noting that the term 'wicked problem' originated in the social field and that these problems are understood to be unresolvable due to their social aspects (Rittel and Webber 1973),³⁰ it is time for Australian Government policy to become better at integrating technical and social concerns. This means recognising the social aspects of all challenges that may currently be represented as purely scientific. Some science policy commentators recognise the necessity of social engagement (Brown, Harris, and Russell 2010).

Suggested elements of an alternative answer to 'Why do we need a strategy?'

- 23 (a) Because Australians need to understand how the Australian Government is not bound by its Constitution to provide national leadership in the areas of environment or heritage (except probably for its own properties), but also how the complicated history of conservation and development in Australia enables the Australian Government to respond to calls (e.g. through *Strategy* consultations) to provide intelligently designed national leadership through 'joined-up' policymaking.
- (b) Because Australians need unambiguous statements about the relationship between 'natural environment' and 'natural heritage', that take into account work on 'novel ecosystems' (Hobbs, Higgs, and Hall 2013) and the concept of the Anthropocene.³¹
- (c) Because Australians need clear and inspirational statements on what heritage means in pluralist Australia, informed by contemporary theory from a number of fields.
- (d) Because Australians need these understandings to guide a new wave of federal policy reform that will in turn drive State and Territory policy reform³² in environment and heritage³³ and in a range of social policymaking fields, including sustainability.
- (e) Because Australians need an integrated vision around which to build reform, such as:

*Heritage is understood as the way we live now, influenced by the way we lived then.*³⁴

or at least,

*Heritage is understood to connect people through place and time and to generate knowledge and understandings about nature and society.*³⁴

- (f) Because Australians need objectives and actions to achieve timed goals agreed at 23 (d). Important amongst these reforms would be alternative funding and delivery models for heritage expertise. Heritage knowledge could be supplied through small Cooperative Heritage Centres (as part of the long-established Cooperative Research Centre model),³⁵ staffed to ensure that single professional bodies do not respectively represent cultural and natural heritage and dominate advice to government. These Centres would be competitive, auspiced by existing cultural and scientific institutions and be resourced by the Australian Government. For example, National collecting institutions seem obvious hosts (according to current Commonwealth Government responsibilities) for Centres selected to provide cultural heritage advice on agreed research questions, but these should also be rotated between State-based institutions. A benefit of periodic State sitings would be work to develop effective models of local engagement to combine with expert opinions for feeding advice into federal policymaking – as indicated by contemporary theory and as already vaguely advocated by the *Strategy*. It is critical that cultural heritage and natural heritage and environmental science cross-overs are built in to such a model for research and advice.
- (g) Because Australians need timed objectives and actions to apply agreed reforms to existing Commonwealth responsibilities i.e. Commonwealth Heritage (whether on the CHL or not) and to the accumulated List of Overseas Places of Historic Significance to Australia (LOPHSA), and the National Heritage List (NHL). Commonwealth Heritage related matters should be entirely resourced by the Australian Government.

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APPENDIX: THE DISTRIBUTED AUSTRALIAN GOVERNMENT HERITAGE FUNCTION³⁶

- i. Founding and regulatory Acts for the National cultural institutions which hold the National Collections. These institutions are mainly located in the nation's capital, Canberra, in the Australian Capital Territory.³⁷
- ii. The *Protection of Movable Cultural Heritage Act 1986* (PMCH Act 1986) (<https://www.legislation.gov.au/Details/C2016C00608>) gives effect to the UNESCO *Convention on the Means of Prohibiting and Preventing the Illegal Import, Export and Transfer of Ownership of Cultural Property 1970*. This Act 'seeks to protect Australian cultural material in a very specific sense – the protection of the object from unregulated export...' (Simpson and Commonwealth of Australia 2015, 13).
- iii. The *Protection of Cultural Objects on Loan Act 2013* to encourage the lending of objects for temporary exhibition in certain Australian institutions without fear of object seizure or forfeiture (<https://www.legislation.gov.au/Details/C2016C00162>).
- iv. The *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* (<https://www.legislation.gov.au/Details/C2016C00456>) and related (*Native Title Act 1993* (<https://www.legislation.gov.au/Details/C2016C00576>) and *Aboriginal Landrights (Northern Territory) Act 1976* (<https://www.legislation.gov.au/Details/C2016C00111>)).
- v. The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act 1999) addresses Australia's obligations under eleven international treaties (<https://www.legislation.gov.au/Details/C2016C00667>). Ten of these concern biodiversity or nuclear safety matters. The eleventh is the UNESCO *Convention Concerning the Protection of the World Cultural and Natural Heritage 1972* (World Heritage Convention) (WHC), which concerns 'cultural and natural heritage' of 'outstanding universal value'. Following the WHC model, the EPBC Act 1999 scales levels of value for a National Heritage List (NHL) ('outstanding value to the nation'), a Commonwealth Heritage List (CHL) ('significant heritage value') and a List of Overseas Places of Historic Significance to Australia (LOPHSA). The threshold for Australian Government activity in these areas is 'Matters of National Environmental Significance', specifically for World, National and Commonwealth Heritage listings. The EPBC Act 1999 is administered by the Department of the Environment and divides Australia's heritage into natural, historic and Indigenous 'domains'. The main reporting instrument for this legislation is the *Australia, State of the Environment* (SoE) Reports.³⁸
- vi. The *Australian Heritage Council Act 2003*, an Environment Minister appointed body, which advises the Minister primarily on nominations to the National, Commonwealth and Overseas Territories Heritage Lists (<https://www.legislation.gov.au/Details/C2012C00249>).
- vii. The *Historic Shipwrecks Act 1976* (<https://www.legislation.gov.au/Details/C2016C00560>) and the Australian National Shipwreck Database.
- viii. The *Natural Heritage Trust of Australia Act 1997*, for the purchase, repair and replenishment of natural environments (<https://www.legislation.gov.au/Details/C2016C00641>).
- ix. The *National Environment Protection Council Act 1994*, to ensure all Australians may benefit from non-polluted air, noise, water and soil and to ensure uniformity across

business, markets and jurisdictions of major environmental protection measures (<https://www.legislation.gov.au/Details/C2016C00385>).

- x. Australia is signatory to the UNESCO *Convention for the Protection of Cultural Property in the Event of Armed Conflict 1954* (The Hague Convention) for place-based and movable cultural heritage. This obligation is not reflected in a dedicated Australian law. Its requirements are largely covered by the *Criminal Code Act 1995* (<https://www.legislation.gov.au/Details/C2016C00544>).

A majority of these laws has tended to be administered by different parts of the Department of the Environment (or similarly titled department) since these were created in 1971. Responsibility for i), ii), iii) and vii) has periodically been in departments closer to the Prime Minister, including the Department of Prime Minister and Cabinet, the Department of Home Affairs, the Department of the Special Minister of State, Attorney-General's Department (Ministry for the Arts), while responsibility for iv) has periodically been in Indigenous affairs departments, when these exist.

ENDNOTES

¹ All web sources cited in this paper were viewed on 15 or 30 June 2016.

² 2012 Consultation materials and submissions are available here:

<https://www.environment.gov.au/heritage/australian-heritage-strategy/past-consultation>; 'A Strategy for Australia's Heritage' Draft for Consultation and submissions responses to it are available here:

<https://www.environment.gov.au/heritage/australian-heritage-strategy/getting-involved>.

³ Conservation-development disputation reached fever pitch in Australia through landmark High Court battles from the 1970s to the 1990s over Fraser Island, Tasmanian Dams, the Daintree Rainforest, the Great Barrier Reef and Kakadu National Park, as the Australian Government supported *World Heritage Convention 1972* preservation requirements over the economic development preferences of state and territory governments (Hawke, Australia., and Department of the Environment 2009, 3; Whitlam 1997, 151, 155). Independent advisory bodies, the Australian Heritage Commission (1975-03) and the Resources Assessment Commission (1989-93), were established to deal with conservation-development issues, and from 1989 sustainable development was explored as panacea.

⁴ For example, discussion under Objective 3 (p. 24) 'Effective management of the Commonwealth Heritage List' of 400 Australian Government owned places, shows that this inability begins with the most direct Commonwealth Government heritage responsibilities under the Australian Constitution and still states: 'Difficult decisions face many Commonwealth Heritage listed place managers over the coming years.'... 'collaborative community and stakeholder engagement... [will be required to]... better direct limited resources'.

⁵ While the Australian Government affords regulatory protections for places on National and Commonwealth Lists their managers must generally apply competitively for grants (Objective 2, pp. 22-23).

⁶ This paper treats all legislative acts, strategies, action plans, inventories, programs etc. as 'avowals of intent' by government, following Dovers (1998, 26; 2005, 12).

⁷ Significance International's submissions to the *Strategy* consultations can be accessed via:

<https://www.environment.gov.au/heritage/australian-heritage-strategy/public-submissions-2012> (Submission 17);

<https://www.environment.gov.au/submissions/heritage-strategy/development/007-significance-international.pdf> (online survey January 2014); <https://www.environment.gov.au/submissions/heritage-strategy/draft/011-significance-international-pty-ltd.pdf> (May 2014). SI also attended a face-to-face consultation in Canberra in May 2014.

SI posted four news items about these events between 2012 and 2014: 'Have your say by June 15' posted 3 June 2012: <http://www.significanceinternational.com/tabid/67/newsid394/36/Have-your-say-by-June-15/Default.aspx>;

'Heritage Strategy Feedback' posted 15 October 2012:

<http://www.significanceinternational.com/tabid/67/newsid394/48/Heritage-Strategy-feedback/Default.aspx>; 'Another bite at heritage strategy for Australia' posted 15 January 2014:

<http://www.significanceinternational.com/tabid/67/newsid394/67/Another-bite-at-heritage-strategy-for-Australia/Default.aspx>; and 'Have your say by June 9:

<http://www.significanceinternational.com/tabid/67/newsid394/73/Have-your-say-by-June-9/Default.aspx>.

⁸ For example: Economic impacts of heritage are given in dollar values in several places e.g. pp. 7, 31, 38. The *Strategy* states 'Indigenous communities can be empowered by building upon the strengths of Indigenous cultures and identities', but interprets this in economic ways. Various referred to as 'our' and 'their' heritage (pp. 38, 11), Indigenous heritage is co-opted to the same economic and people management ends as all other initiatives identified in the *Strategy* through the prism of place e.g. enhancing returns from cultural tourism (Objective 8, pp. 38-39) and 'building capacity' through schemes servicing places, like the Green Army (Objectives 6 & 7, pp. 32-37 incl. Feature 4).

⁹ Since the dollar was floated in 1983 the Australian Government has increasingly embraced market economics (Blewett 2008, 397, 399, 401; Kelly 2008, 357; Rudd 2006). The Department of the Treasury began to produce 'Intergenerational Reports' from 2002 which confirm an Australian Government definition of wellbeing as material wealth (Swan and Treasury 2010, 83-87) rather than as contentment independent of the material world, as in philosophy (Crisp 2013).

¹⁰ The case of Indigenous heritage is clearest on this economic emphasis. In the two reflective passages of the *Strategy* (Introduction, pp. 7-8 and Objective 2, p. 22) different ways of 'measuring' and representing Australia's 'rich' and 'diverse' heritage' are encouraged in terms of social value (pp. 7-8, 12). The Minister encourages us to see the 'spirituality, lore and culture' of Indigenous Australian culture and identity (p. 1) in his Foreword but the capacity of such understandings of heritage to influence the prescribed and singular 'Australian story' – to include the continuum of time / place / life beyond the level of commodity, for example – is not explored anywhere in the document. Rather, Indigenous heritage is addressed on the same terms as all other elements of the *Strategy*, as the identification and physical protection of approved sites (Objective 9, pp. 42-43). The concepts of 'landscape' and 'shared responsibility' are used a number of times in the *Strategy* (notably at Outcome 3 (p. 29)) without the specific Indigenous meanings advocated in their sources of origin – several of the ten essays commissioned for the initial April 2012 Consultation. Further, the call in these essays for integrating heritage divisions goes unheeded e.g. the historic, natural and Indigenous 'domains' in legislation, (Schmider and James 2012; Bell and Elley 2012; Tonkin 2012).

¹¹ This leadership is most clearly traced to the Australian Government becoming an early signatory (1972) and ratifier (1974) of the *Convention Concerning the Protection of World Cultural and Natural Heritage 1972* (<http://www.unesco.org/eri/la/convention.asp?KO=13055&language=E&order=alpha>), and the *Australian Heritage*

Commission Act 1975 (AHC Act 1975)) defining heritage in terms of 'the national estate' (Commonwealth of Australia Australian Heritage Commission Act 1975: <https://www.legislation.gov.au/Details/C2005C00069>) section 4 (1)) as:

...those places, being components of the natural environment of Australia or the cultural environment of Australia, that have aesthetic, historic, scientific or social significance or other special value for future generations as well as for the present community.

¹² Australia ICOMOS 1999, 2–3; Australia ICOMOS 2013, 3.

¹³ The *Environment Protection and Biodiversity Conservation Act 1999* (Vol. 2 s528: 524) also includes MCH in its definition of place: '...(b) a building or other structure, or group of buildings or other structures (which may include equipment, furniture, fittings and articles [our emphasis] associated or connected with the building or structure, or group of buildings or structures);'

¹⁴ See the Federation of Australian Historical Societies' 'About Us' webpage: <http://www.history.org.au/Role,%20aims%20and%20activities.html>. The bias towards archaeological, artistic and historic collections is exacerbated by the non-inclusion of a scientific specimen equivalent body somewhere in the *Strategy*. (The International Union for the Conservation of Nature and Natural Resources (IUCN) listed at Objectives 1, 8 and 11, is concerned with conserving living systems, typically as 'Protected Areas': See <http://www.iucn.org/about/>.)

¹⁵ By 2013 Australia ICOMOS defines place as '...a geographically defined area. It may include elements, objects, spaces and views. Place may have tangible and intangible dimensions.' The 2013 edition retains the same wording for 'Related Object' as the 1999 edition and provides the following explanatory note: 'Objects at a place are encompassed by the definition of place, and may or may not contribute to its cultural significance.' The *Burra Charter 2013* also recognises the *Significance 2.0: a guide to assessing the significance of collections* guideline for assessing the significance of objects in its Preamble (Australia ICOMOS 2013, 1–3).

¹⁶ Smith, Laurajane., and Natsuko. Akagawa. *Intangible Heritage*. London; New York: Routledge, 2009.

¹⁷ I am grateful to Significance International Associate Margaret Birtley for this suggestion.

¹⁸ For example, see the presentation of the National Environmental Science Programme (NESP) at Objective 11 and Feature 6 (pp. 48, 50). The 'NESP Guidelines of the Science Partnership' Section of the Department of the Environment clearly state that the programme is designed 'to deliver applied environmental science, particularly focused on biodiversity and climate systems research...The NESP is an ongoing programme that funds environmental research to inform Australian decision makers'. On page 20 of this 24 page document a two paragraph section titled 'Indigenous Engagement' talks of the need to manage and protect Indigenous heritage and to consult Indigenous Australians 'who have an active interest in where the projects occur...to...outline opportunities for Indigenous employment, skills transfer, knowledge sharing, and increase cultural awareness among all parties.' Overleaf, heritage is mentioned only once more in a one paragraph section on the EPBC Act 1999 in which applicants to the NESP grant scheme are reminded that they are responsible for 'referring any projects to the Minister that are likely to have significant impact on a matter of National Environment [sic] Significance, which includes heritage matters.' Department of the Environment, 2014 'National Environmental Science Program Guidelines' Science Partnerships Section, 24, pp. 4, 20, 21. Available at: <http://www.environment.gov.au/science/nesp/about>. See also <http://science.gov.au/scienceGov/ScienceAndResearchPriorities/Pages/default.aspx>.

¹⁹ This is analogous to Antarctica being referenced in Minister Hunt's 'Four Pillars Speech', soon after taking office, under the banner of Heritage Protection. The funding of a new Centre for Antarctic and Southern Ocean Research to \$24 million and a \$38 million extension of Hobart Airport are not heritage related. Hunt, G 2013 'The Coalition Government's Plan for the Environment' Australian Sustainability Conference 9 October, Melbourne. Available at: <http://www.environment.gov.au/minister/hunt/2013/sp20131009.html>.

²⁰ From 1992 the Australian Government began retreating from the fractious conservation-development agenda, including in its new *National Strategy for Ecologically Sustainable Development* 1992, through such mechanisms as the *Intergovernmental Agreement on the Environment* 1992 and the *Heads of Agreement on Commonwealth and State Roles and Responsibilities on the Environment* 1997. These documents deployed the 'principle of subsidiarity' to shed environment and heritage responsibilities back to the willing states and territories, and culminated in the EPBC Act 1999. This Act became the centrepiece of this withdrawal from heritage. Through it and related Acts, for example, the number of recognised heritage places has reduced from over 13,000 on the Register of the National Estate (under the Australian Heritage Commission 1976-2003) to about 100 places on the National Heritage List (under the Australian Heritage Council 2004-).

²¹ More recently, while funding some new initiatives in June 2012 the Australian Government also announced the Department of Sustainability, Environment, Water, Population and Communities (DEWSPaC) would lose 50 staff, with the impact on the Heritage and Wildlife Division unknown at that time (Morrison 2012, 3). In 2013 'The Division became [was downgraded to] a Branch' in conjunction with 300 Voluntary Redundancies, which proportionately affected heritage staff numbers. Contributing factors were a departmental restructure, changing and concluding projects, natural attrition, loss of casual staff and 'the proposed shifting of some statutory environmental, including heritage, responsibilities to other jurisdictions.' (Morrison 2014a, 2). In April 2014 a further 250 Voluntary Redundancies were announced (Morrison 2014b, 2). In September 2014 the Department's library was closed and dispersed as a cost saving measure, amidst 'a lack of transparency' (Morrison 2014b, 4). Staffing of heritage in DSEWPaC had reduced from the long term average of just over 100 to around 40 by this time. In December 2014 the

Standing Council on Environment and Water (including heritage) was abolished. 'This leaves all Australian government heritage (and environment) agencies without access to a senior level body, as it has had for thirteen years, making it very difficult in the future for nationally useful and consistent heritage policy to be agreed and introduced nationwide.' (Morrison 2014c, 2). Compare also Department of the Environment Annual Reports for 2013-14 and 2014-15 (pp. 5, 18-20, 51-64, 167, 171-2) (<http://www.environment.gov.au/about-us/accountability-reporting/annual-reports>) as well as 2013-17 (<https://www.environment.gov.au/resource/strategic-plan-2013-2017>: archived) and 2014-18 (<https://www.environment.gov.au/resource/strategic-plan-2014-2018>) Strategic Plans. The latter Plan reduces Outcome Areas from 7 to 4 - in terms of the Clean Environment Plan, Heritage Protection was dropped as a discrete priority in favour of Antarctica. Conservation of Australia's Heritage and Environment' is relegated to be one of six programs under the Clean Land outcome. This windback has been attributed to the Williams vs Commonwealth (School Chaplains Case) [2012] HCA 23 (Morrison 2015, 2; Morrison 2016, 2; Wedutenko and Keeling 2014; Williams, Brennan, and Lynch 2010, 10–11) for the funding of community-based programs. This case is noted with the same paragraph in the Department of the Environment Annual Reports 2013-14 (pp. 306, 308) and 2014-15 (pp. 285 and 288) but its specific impact on the Department and its programs is not explained. We note that the Community Heritage and Icons Grant continued in 2015. See the 2015-16 round announcement: <http://www.environment.gov.au/heritage/grants-and-funding/community-heritage-icons-grants/2015-16>.

²² *Australia, State of the Environment (SoE) Reports* are the main public reporting instrument under the EPBC Act 1999. The Drivers-Pressures-State-Impact-Response (DPSIR) environmental reporting model is used throughout the report, including for the heritage chapter. Concerns have been raised about including heritage in SoE Reports for reasons of circular reference (Lloyd 1996). Others attribute this unsuitability to the technical DPSIR model's inability to meaningfully engage with people on the ground and therefore to adequately interpret local scale (Carr et al. 2007).

²³ For example: 'This Strategy is built around a central vision of our natural and cultural heritage being valued by all Australians' (p. 1); '...recognising the value of...' (p. 31).

²⁴ Five of the six Features in Part 2 of the *Strategy* present models and encouragements for the collaborative funding and support of heritage.

²⁵ The *Strategy* states that a number of State, Territory and Local governments already have strategies in place.

²⁶ Notwithstanding recommendations to use digital technologies in the *Strategy* for improved site interpretation and accessibility and the generation of funds (Objective 10, pp. 44-47, including Feature 5).

²⁷ The United Nations Environment Program which originated the *Convention on Biological Diversity 1993*. See <https://www.cbd.int/history/>.

²⁸ Commonwealth of Australia. "Commonwealth of Australia Constitution Act." *Australian Government*. Accessed October 21, 2015: <https://www.legislation.gov.au/Browse/ByTitle/Constitution/InForce#top>. See also footnote 21.

²⁹ We do not recommend following the insincere path of the British Government in its attempt to make heritage policy socially inclusive. See Waterton 2010.

³⁰ Available here: http://www.uctc.net/mwebber/Rittel+Webber+Dilemmas+General_Theory_of_Planning.pdf

³¹ The International Commission on Stratigraphy is due to rule on the Anthropocene as a geological period in 2016: <http://quaternary.stratigraphy.org/workinggroups/anthropocene/>.

³² Legislative reform can occur from either direction, but in the case of constitutional reform it is easier to change a State Constitution than the Australian Constitution (Whitlam 1997, 250). In environment and heritage the Commonwealth led the way in the 1970s-early 1990s. For example, the *Environment Protection (Impact of Proposals) Act 1974* and its reporting device, the Environmental Impact Statement (EIS) (sections 3, 25, 28, 29, 44) introduced this vital standard to Australia from the United States. *Environment Protection (Impact of Proposals) Act 1974*: <https://www.legislation.gov.au/Details/C2004A00220> - although this power was limited until the passing of the EPBC Act 1999 (Hawke, Australia., and Department of the Environment 2009, 3).

³³ Review of the suitability of economic reporting and accounting models should be the first interdisciplinary research question addressed, towards heritage and environment policy reform.

³⁴ If cited in other contexts please attribute to author Veronica M. Bullock, Director, Significance International.

³⁵ For information on the Cooperative Research Centre model, which began in 1990 see: <http://www.industry.gov.au/industry/IndustryInitiatives/IndustryResearchCollaboration/CRC/Pages/default.aspx>

³⁶ All Australian Government Acts are available at: <https://www.legislation.gov.au/>

³⁷ Includes the *Archives Act 1983*, the *Australian National Maritime Museum Act 1990*, the *Australian War Memorial Act 1980*, the *National Film and Sound Archive Act 2008*, the *National Gallery Act 1975*, the *National Library Act 1960*, the *National Museum Act 1980*, the *National Portrait Gallery of Australia Act 2012* and *Public Governance, Performance and Accountability (Old Parliament House) Rule 2016*.

³⁸ Produced in 1985 and then five yearly from 1996 i.e. 2001, 2006, 2011.