

# Comments on *Borders of Culture* 2015



SIGNIFICANCE  
International

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(revised 20.7.16 to include principles at Item 13, **indicated by yellow highlight**)

## Preamble

1. We only wish to address one matter in the bold and comprehensive *Borders of Culture: Review of the Protection of Movable Cultural Heritage Act 1986 Final Report 2015 (Borders of Culture)* by Shane Simpson AM. This concerns the recommended significance assessment methodology i.e. the significance criteria and process.
2. Significance International (SI) provided a range of comments to the public consultation phase of this Review, most of which can be found at the following news item '[If you care for Australia's objects...](#)', posted 28 July 2015. Two SI representatives attended face-to-face consultation sessions with Mr Simpson, Attorney-General's Department staff and other invitees in Melbourne and Canberra, at about the same time in 2015. SI contributions were well received.
3. The 2015 initiated *Review of the PMCH Act 1986 Position Paper* recommended use of *Significance 2.0: a guide to assessing the significance of collections (Significance 2.0)*.<sup>2</sup> Its methodology includes four primary criteria: historic significance, artistic or aesthetic significance, social or spiritual significance, research or scientific significance (*Significance 2.0* p. 39). This methodology had also been recommended in the 2009 Review. SI regards these recommendations as logical outcomes of independently advised Australian Government-funded efforts over more than 15 years now to establish and refine a successful Australian movable cultural heritage (MCH) significance assessment methodology for a wide range of purposes.
4. This paper therefore focuses on section (S) 16 of *Borders of Culture* (pp. 42-56) titled 'Significance and Representation' and on items 24 to 43 of our 'Comments on the Review of the PMCH Act 1986: Position Paper 2015' ((2015 Paper) available at the SI news item '[If you care for Australia's objects...](#)').
5. Items 28 and 29 in our 2015 Paper point out that publisher, the Collections Council of Australia, built the prospect of an evolving significance assessment methodology into the titling of the *Significance 2.0* resource. Indigenous understandings of significance are given as a possible area in which change might occur. We are therefore not opposed in principle to the ongoing evolution of the methodology for significance assessment.

6. We are, however, concerned by the *Borders of Culture* proposal to add a fifth primary criterion for significance assessment. Discussion below explains why we do not support the proposed addition of an 'associative significance' primary criterion (p. 46), or the potential retitling of *Significance 2.0*.
7. We also revisit other items raised in our contribution to the 2015 consultation. Some of the elements in the Position Paper have persisted in *Borders of Culture*. We are concerned about this because we feel that these have the capacity to confuse those working with *Significance 2.0* in the context of a revised *PMCH Act 1986* and *PMCH Regulations 1987*. We suggest ways in which these policies may nevertheless resolve the tensions we identify.

### 'Associative significance'

8. In S 16.2.1 (p. 46) *Borders of Culture* surprisingly proposes a fifth primary criterion: 'associative significance'. This additional criterion was not raised for consideration in the Position Paper and so this is our first opportunity to respond to this proposal. We find the proposal to be problematic for the proposed MCH application.
9. Some significance assessment schemes, especially place-based ones, headline this processual aspect of understanding significance e.g. HERCON.<sup>3</sup>
10. Some *Burra Charter* users regard associative significance as a key process that particularly underlies social and spiritual significance for place- or landscape-based heritage and the objects connected with them.
11. Associative significance was prominently and successfully argued by Dr Isabel McBryde in *World Heritage Convention 1972* related discussions in the early-mid 1990s, in order to convey the special associations Indigenous Australians have with place.<sup>4</sup>
12. We argue that a discrete focus on associative significance reflects an earlier phase in the development of significance assessment methodologies in Australia.
13. *Significance 2.0* acknowledges this canon and weaves associations into its recommended 10-step process (p. 38), criteria (pp. 39-40) and principles (principle # 3 p. 43).
14. The standard documentary way of evidencing associations is to establish Provenance.<sup>5</sup>

15. The fundamental importance of provenance to significance assessment is reflected in the *Significance 2.0* authors' decision to present, early in the publication, one of two methodological features on this topic, at pages 15 to 21.
16. *Significance 2.0* author Kylie Winkworth stated recently that: 'Associations with people and places are integral to historic significance' in the MCH approach.<sup>6</sup>
17. The second of two methodological features in *Significance 2.0* is on Context, at pages 32 to 37. Establishing context is vital to any significance assessment process. Context probes associations in a more general way than provenance.
18. Words such as 'research', 'review', 'explore', 'analyse', 'compare', 'consult', 'identify' and 'assess' in the *Significance 2.0* significance assessment process (p. 38ff) are specifically designed to tease out a range of facts and associations – to tease out Provenance and Context.
19. We therefore maintain that, if understood and used as intended, the existing four primary criteria remain adequate to the task of assessing the significance of MCH in Australia, and that the addition of 'associative significance' would actually constitute a retrograde and confusing step to accumulated learning in the MCH field.
20. It is important to remember that the *Significance 2.0* methodology is based on years of testing in the field. The proposal of new or alternative criteria or process steps should be supported by case study evidence. Such research and testing is not evident in *Borders of Culture*.<sup>7</sup>
21. Finally, we do not regard the addition of 'associative significance' as sufficient grounds for renaming of *Significance 2.0* to either *Significance 2.1* (or similar) or to *Significance 3.0*, as recapped from our 2015 Paper above at point 5.

#### Consultation, an intrinsic part of the *Significance 2.0* methodology

22. Mr Simpson recommends enhanced consultation in regard to Indigenous objects and collections at page 45 in *Borders of Culture*.
23. If done properly significance assessment includes consultation with any 'knowledgeable people' identified through research – at Step 3 of the *Significance 2.0* significance assessment process (p. 38). Those people may or may not be directly associated with the particular object or collection. While it is obvious that Indigenous individuals and / or communities should be consulted about Indigenous holdings, Indigenous people may also offer knowledge to a

significance assessment process about non-Indigenous objects, and vice-versa. It is the duty of the significance assessor to properly canvass diverse contemporary opinion on the subject of their investigation as standard operating procedure.<sup>8</sup>

#### Associative significance + enhanced consultation = ?

24. If the proposal of the additional primary criterion of 'associative significance' and the encouragement to more purposeful consultation regarding Indigenous MCH are forwarded in response to the suggestion, recapped at point 5 above, of alternative 'Indigenous understandings of significance', we comment that highlighting aspects of the existing *Significance 2.0* concept and methods does not approach the scope of possible change if 'Indigenous understandings of significance' was to be considered from outside the trope of top-down Western significance assessment methodologies (such as *Significance 2.0*).
25. We cannot say what a revolutionary 'Indigenous understandings of significance' may look like. This is why specific investigation is recommended.
26. We note that in the matter of revising Control List categories (*Borders of Culture* S 11.6, p. 28 and S 13, p. 31ff) Mr Simpson deletes the discrete category of contemporary Indigenous artworks for sale and folds these objects into the general category of 'Visual Arts, Craft and Design Material' (except potentially where Indigenous consultation may be required in special circumstances (e.g. S 11.5, pp. 29-30)).
27. Our advice on the *Significance 2.0* significance assessment methodology may be considered as analogous to this streamlining tendency. Based on our analysis of the proposal to add an 'associative significance' primary criterion at points 8 to 21 above and for enhanced Indigenous consultation at points 22 and 23 above, we do not see a strong argument for complicating the existing *Significance 2.0* methodology at this time.

#### 'Comparison' and 'degree' in *Significance 2.0* ≠ 'representation' and 'level' in *Borders of Culture*

28. Returning to item 35 in our 2015 Paper, comparison with other objects or collections is an intrinsic part of the *Significance 2.0* methodology – at Step 6 of the *Significance 2.0* significance assessment process (p. 38). It is not possible to reliably evidence the degree of significance of an object or collection without such comparison.

29. For regulatory purposes we accept that a further 'representation' test to the 'comparative' test within *Significance 2.0* may be required by government to clearly assign the property within a system of government-defined thresholds.
30. It is important, nevertheless, to acknowledge the role of comparison within the *Significance 2.0* methodology, as this demonstrates its intelligent design and will potentially save government time and funds in separately commissioning full representational testing. Only a partial representation check should be required.
31. Similarly, using the comparative criteria, the *Significance 2.0* assessment process aims to reveal 'degree' of significance. The *Significance 2.0* authors very clearly only use the terms 'level' and 'threshold' of significance in regard to application of the methodology to such formal settings as government regulations and grants.
32. It is important that the terms 'comparison' and 'degree' continue to denote the requirements of the *Significance 2.0* methodology, while the terms 'representation' and 'level' may now denote the requirements of legislation.
33. We agree with the collapsing of dot points at 16.11 (p. 55) in *Borders of Culture* (from three dot points at page 40 of the Position Paper, addressed at item 36 of our 2015 Paper), and the proposal now of two clearly differentiated deliverables i.e. a 'statement of significance' and a 'statement of representation'.
34. We suggest that Figure 8 'Significance and Representation Summary' in *Borders of Culture* be revised at Category 1 'Significance assessment' to reflect the differentiation of standard significance assessment from government overlaid 'representation' and 'level' determining roles by revising the box text to state: 'An assessment of primary and comparative criteria, in order to ascertain the degree of significance of the material'.
35. Standard significance assessment will show whether an object is regarded as highly significant, for example. This degree of significance may indeed be adequate to proceed to representational testing e.g. see paragraph 1 at S 16.8.2, (p. 53) of *Borders of Culture*.
36. If a significance level, such as 'national', 'state' or 'local' must be attributed to an object or collection a new Category 2 should be titled 'Significance level attribution' before proceeding to representational level testing – as this is an additional step to the degree of significance determined through regular significance assessment.
37. We applaud the decision to stay with the National Estate interpretation of significance levels as relating to 'any part of Australia', not as is sometimes

asserted only to 'national' level significance. (The same assertion has also, erroneously, been levelled at *Significance 2.0*<sup>9</sup>).

### Ordering the significance assessment process

38. It is correctly stated in *Borders of Culture* (e.g. pp. 44, 47-48) that the detailing of the significance assessment process belongs in accompanying Regulations / Guidelines rather than the Act. Some reference is made to process in the report, however, and so SI comments are directed to the same level of generality.
39. S 16.2.1 and 16.2.2 (*Borders of Culture* pp. 46-47) recommend a two-step order to conducting significance assessment. Step one is to 'apply a set of primary criteria' and Step two is to 'determine the level of that significance' including 'associative properties'.
40. Significance assessment is, first and foremost, a research process. The *Significance 2.0* methodology recommends keeping an open and absorptive mind throughout the research process until assessing against both primary and comparative criteria at Step 8 (p. 38). At Step 9 a statement of significance is written (p. 38) which takes all research findings and Step 8 results into account.
41. While the aim of significance assessment may be reduced for simplicity to the two steps which embody the two sets of criteria, as in *Borders of Culture*, the Regulations and supporting guidelines should give fuller account of the full significance assessment research process, not least for training purposes.

### Principles?

42. *Significance 2.0* contains nine 'Principles for good practice with significance' on pages 42-43. It is not entirely clear at *Borders of Culture* S 16.3 (p. 48) whether these Principles are being referenced, or whether the evidence presented regarding *Significance 2.0* criteria and process up to page 48 in *Borders of Culture* comprise the principles being referred to.
43. We suggest that, if used, 'Principles' be defined as appropriate in the Act and / or Regulations to clearly indicate one or other meaning.

## Five-year period of validity

44. We agree with the 5-year period of validity for significance assessments as described at S 16.5, p. 49f.

## Expert Cultural Significance Assessors

45. We agree with the decoupling of significance assessment from decision-making about exports at *Borders of Culture* S 17.2, pp. 60-61.

46. We are disappointed that mechanisms for directly recompensing Expert Cultural Significance Assessors remain the same i.e. payments are made to employing institutions (*Borders of Culture* S 17.3.2, p. 62). See item 48 in our 2015 Paper for our request to provide more direct recognition of Assessors' work.

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## ENDNOTES

<sup>1</sup> I thank SI Associate Margaret Birtley for reviewing a draft of this paper. I have acted on many of Margaret's helpful suggestions, but not all. Responsibility for the final structure and statements remains with Veronica Bullock. Preparatory discussions with Ms Kylie Winkworth, Ms Roslyn Russell, Prof. Ken Taylor, Dr Marilyn Truscott and Dr Charlotte Galloway have been very helpful in formulation of this paper.

<sup>2</sup> Russell, R and K. Winkworth 2009 *Significance 2.0: a guide to assessing the significance of collections* Collections Council of Australia Ltd, Adelaide. Available at: <http://arts.gov.au/resources-publications/industry-reports/significance-20>. Viewed 16 April 2016.

<sup>3</sup> There is no easily citable source for the HERitage CONservation, or HERCON, criteria. The Ministerial Council which approved these criteria in 1998 has since been abolished, but these more discursive criteria have been embedded in a number of State laws. See *Borders of Culture* footnote 39 (p. 45) for a sense of these criteria.

<sup>4</sup> McBryde, I. 2014 Reflections on the development of the associative cultural landscapes concept *Historic Environment* 26 (1): 14-32.

<sup>5</sup> Provenance is also useful in determining degree of significance and is therefore also included as a comparative criterion in the *Significance 2.0* methodology.

<sup>6</sup> Winkworth, K. Pers. Comm. 26 February 2016.

<sup>7</sup> The requirement for case study evidence to underpin any proposed changes in the *Significance 2.0* methodology was raised by author Kylie Winkworth, 26 February 2016.

<sup>8</sup> This vital aspect of significance assessment research unfortunately appears not to be highly valued in current grant schemes. Such social surveying can be time consuming. A leading scheme advises that an entire significance assessment can be conducted in two days on site and with five days of report writing. This formula rarely allows time to do more than locate, absorb and interpret published and some unpublished records and compare with easily locatable other objects / collections.

<sup>9</sup> For example, Henderson, J., L-A Kerr and D. Gwilt 2014 *The Distributed National Collection in Wales – conservation on the national agenda ICOM-CC 17<sup>th</sup> Triennial Conference Preprints, Melbourne, 15-19 September 2014*, ed. J. Bridgland, art 1501, 9 pp. Paris, International Council of Museums: 2. Available at:

[https://www.researchgate.net/publication/268684424\\_The\\_Distributed\\_National\\_Collection\\_in\\_Wales\\_-\\_Conservation\\_on\\_the\\_national\\_agenda](https://www.researchgate.net/publication/268684424_The_Distributed_National_Collection_in_Wales_-_Conservation_on_the_national_agenda). Viewed 16 April 2016.