Green Army Programme
Draft Statement of Requirements

A contribution

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1. The Abbott Government is to be congratulated for its seriousness in addressing the deficit of care for, and understanding of, Australia's environment and heritage through the establishment of a targeted youth employment scheme.

2. The opportunity to contribute to the shaping of this programme is very much appreciated, and in itself, builds trust within communities.

3. The non-leading nature of the documents for this (and the recent second-round National Heritage Strategy) consultation is also noted and appreciated.

4. Environment Minister The Hon. Greg Hunt MP announced the four pillar structure of the Department of the Environment vision on 1 November 2013: [1]

   clean air | clean water | clean land | heritage.

5. Heritage is one of the responsibilities of the Department for the Environment, reflecting the intent of primary legislation the *Environment Protection and Biodiversity Conservation Act* (1999), and is included in the *Australia State of the Environment* Reports.

6. As part of the *Plan for a Cleaner Environment* an intended outcome of the Green Army clean-up will be to slow the decline of Australia's biodiversity.

7. All environmental aims of these new initiatives are applauded.

8. However, Significance International is not expert in the area of environment. Following comments therefore pertain almost exclusively to our area of expertise: heritage.

9. Minister Hunt suggests the following division of heritage: Indigenous | European | Natural. [2]

10. Heritage appears to be an odd bedfellow given the emphasis on cleaning in these initiatives.

11. Certainly there is a role for sensitive and skilled cleaning across all material heritage.

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[1] http://www.environment.gov.au/minister/hunt/2013/tr20131101.html
[2] The traditional division of heritage is into: natural | place-based | movable.

12. However, the 'Green Army Programme Draft Statement of Requirements' (the document), and particularly Section 1.1 'Introduction' (ref. lines 2-19), does not position the case of heritage clearly, or adequately characterise the sorts of heritage projects that may be undertaken – notwithstanding the listing at 2.5.1 'Types of Green Army Projects' as follows (ref. lines (310-) 322 -326):

> g. cultural heritage restoration, including Indigenous heritage;
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> h. signage to improve interpretation of heritage sites;
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> i. conservation maintenance of heritage sites; and
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> j. restoration of heritage gardens or landscapes.

13. The impression is given that Australia's material heritage is already fully identified and that it is readily 'readable'.

14. Since it began in 1996 The *Australia State of the Environment* (SOE) Report has bemoaned the lack of knowledge about the nature and extent of Australia's material heritage, and the attendant lack of condition monitoring, promised in the SOE process.

15. We respectfully suggest that the monitoring of identified heritage sites and their related objects should be the initial heritage aim of the Green Army.

16. We also suggest that training to enable the identification of sites and objects of potential heritage value be provided to each Green Army Team, to avoid the loss of these irreplaceable resources and to increase heritage diversity.

17. Heritage diversity can stimulate innovation and problem solving in a similar way to biodiversity and geodiversity, and also addresses social needs.

18. Decisions about whether to preserve, conserve, adaptively re-use, or restore places and objects are complex. Boiler-plate solutions are inappropriate in such decision-making. Specialist training is required, and carefully crafted community consultation is strongly advised.

19. The 2012 ACT & Region Heritage Partnership Symposium found a dearth of people qualified to determine social values in the heritage field. [3] Social value assessment would be another useful skill for some Green Army Teams to deploy.

20. Emergency Management training for cultural heritage is very limited. Green Army trainees could substantially increase the on-ground knowledge base in this important but often overlooked aspect of disaster preparedness and response, now and well into the future.

21. References to Indigenous heritage in the document are respectful. However, Indigenous concepts of significance may often differ from formulas embedded in

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[3] http://www.cas.asn.au/about.php (scroll down)

prevailing heritage legislation. [4] This complexity is acknowledged in the finding of the 2009 *Review of the Protection of Movable Cultural Heritage Report*, which identified Indigenous significance as an urgent area for further research. [5]

22. Given this context it seems unfair to expect short-term Green Army participants to bridge such huge issues in person, on the ground.

23. While appreciating that a main purpose of the document is to explain the parameters of the human resources aspects of the Green Army, the 'Risk Management' Section 2.8.1 of 2.8 'Monitoring and Managing Projects' (ref. lines 470-481) neglects to make provision for the identification, assessment and management of risks to the assets e.g. heritage sites and objects which are the subject of the projects. This is a serious oversight and should be rectified.

24. Similarly, Key Performance Indicator 3 (ref. lines 640-644) addresses Quality as an ex-post factor.

25. Quality Control is the key challenge in the document.

26. There are salutary lessons from overseas in the confusion and unforeseen costs unleashed by differential management of heritage projects. A case in point is the 1990s Delta Scheme, which sought to classify and conserve all significant cultural heritage across the Netherlands. Although a framework was agreed, it was flawed, and participating groups were allowed autonomy in their interpretation of the framework. After recognising the problem once data were in the Netherlands heritage agency (RCE) is still trying to retrieve meaningful information from the legacy data and shape an improved scheme for the future. [6]

27. Building on careful Australian learnings to date e.g. the cultural heritage indicators in the 2006 SOE and significance assessment frameworks adapted to Australian conditions (*The Burra Charter* 1979-2013 and *Significance 2.0: a guide to assessing the significance of collections* 2009-2010), the quality of project designs should be thoroughly assessed, and strategic approaches piloted, before they are funded to proceed.

28. We respectfully suggest that ex-ante Quality assessment of Green Army project designs – both individually and as a collective - be inserted into the document, and implemented diligently during the Project Sponsor / Australian Government project appraisal period. [7]

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[4] For this and other reasons Significance International has recommended an overhaul of Australia's heritage legislation. See our News Item:
http://www.significanceinternational.com/tabid/67/newsid394/67/Another-bite-at-heritage-strategy-for-Australia/Default.aspx
[5] 2009 Report of public consultation on the Protection of Movable Cultural Heritage Act (1986):
http://arts.gov.au/topics/public-consultations/submissions/review-pmch-legislation/report-outcomes-review
[6] T. Luger 2011 'A new method for assessing the value of collections' *Preprints of the Committee for Conservation of the International Council of Museums 16th Triennial Conference*, Lisbon, September 2011, 8pp. (Note: RCE investigations include Australian models.)
[7] As a practical suggestion the 'wildlife corridor' concept already operative in the Department of the Environment could be extended to overtly include cultural heritage aspects. This concept is well used in the United States to present Indigenous and non-Indigenous elements of heritage and environment e.g. The Gullah / Geechee Cultural Corridor: http://www.nps.gov/guge/index.htm. For a description of cultural

29. Given the critical importance of conveying consistent best practice approaches for heritage outcomes, we therefore recommend the establishment of a HEE (Heritage and Environment Expert) Team for access by all entities of the Green Army Programme as soon as possible. Please find following a slightly altered organisational diagram that includes this proposed element.

30. Other tasks of the HEE Team could include:

- rapid appraisal of proposed sites and objects of significance identified by Green Army Teams (Item 16);

- training in and then assimilation of heritage site and object monitoring results for the *Australia State of the Environment* reporting process (Item 15);

- approval of appropriate levels of intervention in heritage property e.g. preservation, conservation, adaptive re-use, restoration (Item 18), and agreed single method guidance on pubic consultation (Items 18 and 19);

- agreed single method guidance in First Aid for Cultural Heritage in emergency situations (Item 20).
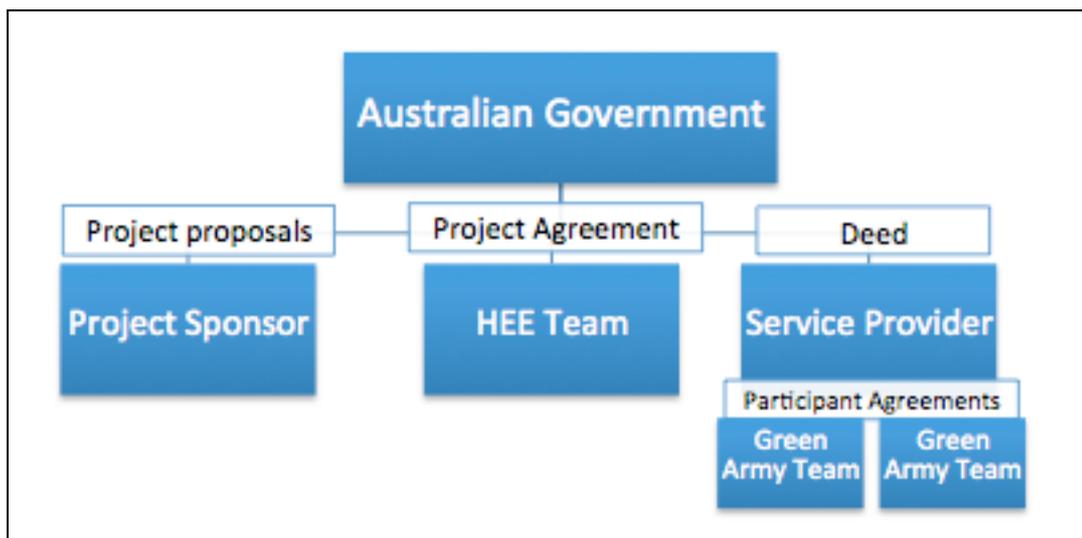
Alternative Figure 1. Proposed alternative administrative components for the Green Army Programme. (ref. lines 71-72)

31. Once again we congratulate the Abbott Government for launching this initiative. It will inform, skill and empower many individuals and under-resourced heritage organisations.

32. It is also hoped that this four-year programme succeeds in opening the minds of communities to the value of Australia's natural and cultural heritage, not only as assets but as fundamentally non-economic forms of capital.

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heritage corridors, scroll down on this page: http://www.nps.gov/blac/parkmgmt/whats-a-corridor.htm. An example of an Australian environmental conservation corridor is that for the Great Eastern Ranges: www.environment.nsw.gov.au/resources/nature/ccandger.pdf. Read about the various scientific definitions of corridors on pages 15 and 16.