

Australia ICOMOS Guidelines for Submissions

1. Preamble

Australia ICOMOS is the most comprehensive association of professionals involved in heritage conservation in Australia. It encompasses a wide range of views on professional conservation issues and encourages national debate on those issues.

Given the extent of the expertise of Australia ICOMOS members there is an obligation to make skills and expertise available to the broader community. One way in which this can be done is to engage in public debate on issues of significance.

Australia ICOMOS is, however, not an activist body in the same way as the National Trusts or the Australian Conservation Foundation whose membership is open to all people on the understanding that those organisations will take a campaigning role on a wide range of issues.

Australia ICOMOS must also be careful not to disenfranchise its members by taking a stand on specific issues against the interests or well-being of those members, other than when those members are acting against the principles and policies of Australia ICOMOS.

Therefore, efforts of Australia ICOMOS in providing advice and entering public debate need to be primarily directed towards issues of principle and policy rather than specific debates on the conservation of places and objects of cultural significance. However, issues affecting listed or tentatively listed World Heritage properties and listed or nominated national heritage places are also a legitimate and important focus for Australia ICOMOS as a peak national professional body.

In addition, Australia ICOMOS should make submissions on any general matter where it can make a significant contribution to cultural heritage conservation in Australia.

2. Guiding Principles

2.1 Australia ICOMOS will only make submissions on issues where a significant matter of policy or conservation principle is involved. Australia ICOMOS will generally not make submissions regarding minor or individual matters of poor practice, but may become involved where major or systemic problems are apparent.

2.2 Australia ICOMOS will not make submissions arguing for the listing or preservation of particular places other than in instances where the conservation principles laid down in the Burra Charter are not being applied for places that should be included on the national heritage list or nominated to the World Heritage List. Australia ICOMOS will not make submissions regarding state-level places unless in exceptional circumstances.

2.3 Australia ICOMOS will act to ensure that places of World Heritage value are afforded appropriate protection, conservation, management and interpretation by responsible Australian authorities, and that potential World Heritage places are tentatively listed and nominated in a timely manner.

2.4 In making submissions Australia ICOMOS will attempt to reflect a professional view on behalf of the general membership and will not normally represent one member or group of members against the interests of other member(s) unless a

member were to act contrary to the adopted policies and principles of Australia ICOMOS.

3. Scenarios for Australia ICOMOS Submissions

3.1 Single Place Issues:

- Where the conservation of a significant place is jeopardised because the proper processes established by the relevant government or appropriate heritage agency are being overridden or not allowed to operate. In arguing for an alternative answer Australia ICOMOS will emphasise issues of policy and principle with special reference to the Burra Charter.
- Where a place included on or nominated for the World Heritage List is threatened by action or inaction.
- Where a place of national significance is threatened by the action or inaction of the managing authority.
- Where requested, to comment on the process adopted for the assessment and conservation of a place.
- Where requested, to provide comparative international material and comment on the conservation of a place, drawing upon the knowledge and experience of other national committees.

3.2 Legislative Issues:

Submissions on the content of legislation affecting heritage places or the processes adopted to develop such legislation.

3.3 Administrative Issues:

Submissions to government agencies and/or heritage property owners or managers in relation to processes required for compliance with the World Heritage Convention or Australia's National Heritage Management Principles.

Submissions and representations on the appropriateness of administrative arrangements made to provide for the identification, protection, conservation, management and interpretation of places of significance. Such submissions should, wherever possible, refer to the capacity of those arrangements to address the principles laid down in the Burra Charter.

Where requested, submissions on the operating guidelines and policies of an organisation whose actions may affect heritage places. Where possible such comment should draw upon the principles laid down in the Burra Charter.

Reviewed by Jane Harrington and Helen Wilson. August 2012

Updated February 2018 by Duncan Marshall and Richard Mackay (with other members of the Strategic Advocacy Reference Group); endorsed by EC February 2018.