

National Cultural Heritage Forum

Submission to Productivity Commission Inquiry into the Conservation of Australia's Historic Heritage Places (II)

Introduction

The National Cultural Heritage Forum (NCHF) made a brief initial submission to this Inquiry in August 2005. That submission outlined the role and membership of the NCHF, and provided the Commission with a copy of the NCHF vision statement for cultural heritage in Australia.

Following the release of the Productivity Commission's draft report, the NCHF met with the Commissioners in Canberra in late January 2006 for an informal discussion. The Forum very much appreciated this opportunity for a wide ranging and interesting discussion, which we hope was mutually beneficial. This submission does not attempt to canvass all the issues raised in the draft report, or discussed at our meeting. Many of our member organisations have made substantial and useful submissions, and we do not feel the need to duplicate these.

However as the peak organisation for cultural heritage in Australia, representing both key NGOs and statutory authorities involved in cultural heritage, our members feel it is appropriate that we make a few key points arising from our discussions with the Commissioners, and pick up some resulting questions, issues and suggestions.

Findings and Recommendations Supported by NCHF

The NCHF is pleased that the draft report acknowledges the significant contribution of heritage to society and the existence of market failure and the consequent need for government involvement. It also usefully identifies some 'squeaky wheels' within the system.

The issues of lack of data and reporting capacity are well covered, and the recommendations which relate to rectifying these are strongly supported.

The NCHF regards the submissions and the research undertaken by the Productivity Commission itself as a very important resource, and an excellent outcome of the Inquiry. This information should be of use to the next Australian State of the Environment Report, due this year.

The NCHF recommends that all submissions and commissioned research be made available to the Australian Government (including the Australian State of the Environment Committee) for permanent storage and future reporting uses.

Evidence for Key Recommendations

As noted above, the draft report stresses the lack of data on which it bases its considerations and recommendations. The major recommendation - use of voluntary conservation agreements (VCA's) as the basic tool for heritage conservation in Australia - relies heavily on anecdotal evidence presented to the Inquiry, presumably for this reason.

This anecdotal evidence is coming from a very small percentage of private property owners who object to heritage listing. NCHF does not consider that the Productivity Commission has demonstrated from the evidence that heritage listing is financially onerous in the majority of cases. What evidence there is suggests a very much more mixed picture.

The draft report also claims that 'over listing' is a major problem but it evinces little evidence of this, and makes no reference to international practice in this area. Based on the available evidence, it is in fact as easy to say that there is as much a problem of 'under listing' as 'over listing', since some local government areas have no places listed at all.

On the other hand, the NCHF considers that some of the conclusions apparent from the data have not yet been incorporated into the draft report. For instance, there is very considerable evidence about disquiet among peak organisations and State agencies concerning lack of Commonwealth leadership, and notable teething problems with the new national legislative regime which are not canvassed in the draft report.

Furthermore, the draft report provides a strong argument for the 3-tier alignment of significance assessment criteria and commonly explained thresholds – but this is not carried into the Findings or Recommendations. Finally, while there have been numerous case studies and arguments presented to the Inquiry which suggest that in many cases governments do not exercise best practice in their own stewardship of public heritage assets, there is surprisingly no Finding or Recommendation in the draft report about this substantial component of Australia's heritage conservation arrangements.

There are numerous other instances of this throughout the draft report, and the NCHF suggests that the usefulness of the final report would be enhanced by bringing a wider range of these recommendations forward.

The NCHF recommends that a broader range of findings and recommendations arising from the evidence available to the Inquiry (and discussed in the chapters of the draft report) be brought more clearly into the Final Report.

Listing & Voluntary Conservation Agreements

NCHF recognises that in discussing problems relating to listing and consequent obligations for private property owners, the Productivity Commission has targeted an important issue. Listings and heritage orders are sometimes poorly communicated. This is exacerbated to some extent by lack of expertise, facilitation and funding at the local level.

It is recognised that conservation of the heritage values of a listed place can have adverse economic effects for some owners. This is recognised in most jurisdictions through the considerations taken into account when responding to permit applications.

NCHF notes however, that the Commission has 'raised the bar' in terms of the costs it ascribes to the private owner of a heritage listed place, as the Commission includes 'foregone development opportunities' as a cost borne by private owners. We disagree strongly with this ascription of unfettered property rights, and reject the Commission's view that heritage listing inevitably constrains use and results in substantial conservation costs to owners.

Where these impacts do occur, carefully targeted additional financial incentives, such as tax relief, differential rating, loans or grants are appropriate, so that the community helps to pay for the "good" in which it shares. The wide range of incentives and assistance available to owners for the upkeep and sympathetic modification of listed properties has been described in detail in many submissions to the Inquiry. However,

it is worth further noting that the withdrawal of Commonwealth facilitation and programs to assist and encourage heritage conservation at a local level has increased the difficulties in funding these incentives.

NCHF members are very interested in the application of conservation agreements for heritage places, as one part of the heritage conservation regime. We have long supported such schemes, drawing on the experience of the Commonwealth Government's natural heritage initiatives. However, the NCHF considers that these proposed conservation agreements will only work if they are part of a well designed and well integrated suite of legal measures, policies, programs and financial incentives (as is the case for natural heritage). The solution proposed by the draft report will not be effective without these other elements in place.

Comparisons with Natural Heritage Arrangements

NCHF would urge the Productivity Commission to look closely at the suite of legislation, policies and program measures which precede and support the use of VCA's for conservation and management of the natural environment, and consider the differences between this and the situation for historic heritage conservation.

Table Showing Comparison between National Natural Heritage and Historic Heritage Conservation Regimes in Australia

<i>Natural Heritage</i>	<i>Historic Heritage</i>
Relevant wide reaching international convention and national legislation in place since 1999	Limited International Convention covering World Heritage only. New and untested national legislation.
Sound and comprehensive national policy foundation worked out in agreement with the States and Territories ¹	No agreed national policy or programs for heritage conservation generally in Australia. Weak intergovernmental cooperation (but it is noted HCOANZ has started work on a national strategy)
A range of agreed standards for the conservation of biodiversity throughout Australia, negotiated with the States	Though the <i>Burra Charter</i> has widespread currency, there are no further agreed national standards; conservation practice of varying effectiveness in different States and Territories
A wide range of programs developed by the Commonwealth in cooperation with the States aimed	No Commonwealth programs or funding for historic heritage place conservation, except for places on

¹ The NHT, through its policy objectives, themes and areas of activity now provides for three overarching objectives:

Biodiversity conservation - the conservation of Australia's biodiversity through the protection and restoration of terrestrial, freshwater, estuarine and marine ecosystems and habitat for native plants and animals.

Sustainable use of natural resources - the sustainable use and management of Australia's land, water and marine resources to maintain and improve the productivity and profitability of resource based industries.

Community capacity building and institutional change - support for individuals, landholders, industry and communities with skills, knowledge, information and institutional frameworks to promote biodiversity conservation and sustainable resource use and management.

specifically at natural heritage conservation at a local and regional level, and at promoting community awareness	the National List and ad hoc cases (eg. cathedrals); withdrawal of the Commonwealth from any role in state, regional and local heritage conservation, without the conclusion of agreements on these issues with the States and Territories
More than 10 years of operation of projects such as Landcare, Bushcare, Coastcare (etc) in the community, which have contributed considerably to the community's appreciation of the importance of their natural heritage	Absence of any substantial equivalent programs
A range of voluntary conservation agreement programs, all with specified and allocated funding.	Limited voluntary conservation agreements on a spotty and poorly supported basis.

In summary, in the natural environment there is strong international and national heritage legislation backed up by national heritage policies and programs, agreed Commonwealth and State minimum standards and a very substantial program to encourage community awareness, support and involvement. All of these tools are deployed in the conservation of the natural environment, and VCA'S are only one tool in a significant repertoire, and as one part of this very considerable government commitment. This commitment has been in place of some time, and it can be argued that it has had an important effect on community understanding and sympathy. As a result, it is probable that people are now much more willing to enter into voluntary conservation agreements in relation to the natural environment -- especially when there is such a range of dedicated funding to assist them.

The 'model' of natural heritage conservation differs from that of historic heritage conservation in another important way. The intended outcome in natural heritage conservation is ensuring the well being of the whole ecosystem as often as it is the protection of threatened species or vulnerable habitat. In contrast, in the conservation of historic heritage values the intended outcome is the protection of the identified heritage values of that particular place, whatever the values it holds, whatever place it may be. The focus is on the unique values of the identified heritage place: there are not sets of equally possible choices as to which place would best serve the particular conservation purpose. Instead, the system identifies a series of unique heritage places which are protected and conserved, and together make up the heritage 'ecosystem'.

As described in the draft report, the proposed reliance on VCA's for heritage places in private ownership, would be the *only* instrument available to protect these places, rather than one option in a suite of legal and program measures, and would begin in isolation, with no provision for accompanying community awareness and involvement programs. It is the view of the NCHF that the identified problems which the draft report seeks to address are more effectively dealt with by targeted solutions rather than a single, universal solution.

Scenario: application of proposed VCA system to the conservation of an important archaeological site

There is a proposal for a major shopping development. The land and the proposed development are worth \$200 million. It is in private ownership. The site contains rare and endangered species, and a substantial pre-1800 historical archaeological site (also rare and endangered).

According to the Productivity Commission's proposed regime, the natural and cultural heritage at this site would be dealt with startlingly differently. The rare and endangered species would be protected by Commonwealth and State laws and development could not proceed until concerns relating to this were addressed. Undoubtedly local conservation groups, encouraged by 10 years of community support would actively support such protection.

In contrast, the historical archaeological remains would only be protected if the owner agreed to this on a voluntary basis, or if the relevant level of government acquires the property or provides an incentive which reflects the income deferred or foregone.

This contrast is particularly startling when it is recognised that the rare and endangered species may not be unique to this site, whereas the archaeological remains may be, and their destruction permanently erases the evidence they provide from the record.

Presumably the state, if indeed it did purchase the property, would then onsell it to another owner with a covenant in place requiring future development to be sympathetic to the conservation of the archaeological remains. It is difficult to see that this cumbersome process would be more effective than the state having the power (as it does now in most jurisdictions) to impose conditions for the conservation of the archaeological sites, similar to those which exist for the protection of rare and endangered species.

The Productivity Commission should consider targeted solutions for specific classes of problems rather than trying to design one option to fix all problems.

It is recommended that, in its final report, the Commission amend its recommendation for voluntary listing as the sole basis for heritage conservation, and instead recommend the implementation of a suite of measures for the historic environment similar to that in place for the natural environment. The concept of voluntary conservation agreements is supported as part of this package, but not as a pre-requisite for heritage listing.

Heritage Care

A proposed new national program – *Heritage Care* – is included in the NCHF Vision Statement for Australia's cultural heritage. Discussions with the Productivity Commission indicated that more detailed explanation of this proposal might be useful to the Inquiry. This proposal would assist both in improving historic heritage conservation, especially in regional Australia, and in actively involving the community in this work. To some extent the *Heritage Care* proposal is modelled on other national programs such as Landcare, Bushcare, Coastcare (etc).²

² A number of NCHF organisations have also supported this concept in submissions to the Productivity Commission.

For natural heritage, the related programs are funded from the Natural Heritage Trust. They are based on local community involvement -- both at the planning and implementation stages of conservation projects. They might involve removal of noxious weeds, native vegetation re-planting, fencing to protect certain species, provision of access or information about specific important places or ecosystems, soil stabilisation work, etc. This work is carried out by local volunteers with grants for materials and other assistance made by the Commonwealth Government through a series of local and regional committees. There is good cooperation with relevant state agencies. The program is supported by young professionals, and regional or local co-ordinators, who ensure that proper procedures and processes are followed and provide necessary training. It has produced a whole series of manuals and other teaching aids about aspects of the work which are used by volunteers in carrying out the work.

This program has had a number of good results:

- it has led to increasing community involvement in nature conservation
- it has been a powerful educational tool in the local and regional community
- it has achieved some significant programs which have contributed to the conservation of natural heritage in regional Australia.³

A similar program for the conservation of historic heritage would have some of the same positive benefits for local heritage places throughout Australia, and especially in the country (where the Productivity Commission has identified particular needs).

It would involve all Governments, with the Commonwealth Government providing national coordination and leadership, including program design. It would provide assistance to local communities to enable volunteers to carry out a range of tasks aimed at cultural heritage conservation. Sufficient resources and careful design would need to be put into the scheme to make sure that it worked properly and that sufficient expertise was available to allow good conservation work. However, a lot of the work could be fairly simple and could include:⁴

- identification of heritage places
- routine maintenance and minor repairs
- provision of information about local heritage
- assistance to the owners of heritage places to conserve them or to make them available to the public.
- restoration and repair of public buildings (local memorial halls, churches, post offices etc for public or commercial use)
- training and familiarisation programs for the local community.

An added advantage would in some cases be that heritage tourism would benefit and therefore so would the local economy.

Another alternative to the setting up of a separate program would be to extend present programs (such as those funded through the Natural Heritage Trust) so that they encompass the historic heritage conservation needs as well as the natural heritage conservation needs of communities. This would be in keeping with recent

³ NCHF is aware that Bushcare, Landcare (etc) are not perfect, but what is clear is that they do result in successful local voluntary conservation and community involvement. The audits done of them point to some improvements which could be imported into the proposed Heritage Care model.

⁴ For example, the Victorian *Hands on Heritage* program based on partnerships between the Heritage Council, Conservation Volunteers Australia, and many local authorities and private owners demonstrates the range of cost effective conservation works that could be undertaken.

amendments to the EPBC Act which includes natural and cultural heritage as part of the definition of the environment.

There are already a number of courses and aids available to use in this sort of work - for instance the former Australian Heritage Commission's *Protecting Local Heritage Places: a guide for communities* (available on the DEH web site).

A good example of a successful community heritage project is the convict built Old North Road, north west of Sydney. Here the local community has galvanised a range of supporters both from government and private enterprise to restore the road using simple techniques and volunteer work to create an impressive heritage trail. Funding for this project was initially made available through the National Estate Grants Program (now defunct), but the community was able to build on this important seed funding from the Commonwealth and has continued with the project.

Another good example of a successful program in the past, through the NEGP, was funding for heritage advisers. One of the arguments against this funding at the time was that it was the responsibility of local government, and could be subject to cost shifting. In fact, this initial funding for heritage advisers convinced many State governments and local councils of their worth, and as a result the use of heritage advisers is now widespread, and funded at the State or local level (though they are still spread unevenly, and too thinly across local government areas).

The *Heritage Care* program too would need to be designed in such a way that it minimised cost shifting and that it targeted projects not otherwise catered for. The National Estates Grants Program in its early years avoided this problem by making grants directly to local government on the basis of Australian Heritage Commission's judgement of the need, the likelihood of success, and the importance of the project. In this way, specific types of endangered sites (eg. pastoral infrastructure such as woolsheds), could be targeted in a national program which crossed state boundaries and produced national outcomes as well as assisting significantly in situations where the owners of such properties cannot afford their upkeep. In the same sort of way particular communities with a range of significant heritage buildings both public and private could be assisted specifically, based on merit and need.

There is an argument that state and local government should fund programs such as this for themselves -- and some do. But one of the main aims of the *Heritage Care* program would be to act as a catalyst to get communities broadly involved and interested in working for their heritage (rather than seeing this as the domain of professional elites alone). The spin-off from this in the natural environment has been impressive, and has meant that as a consequence, local councils are now much more aware of environmental issues, and are creating similar programs of their own.

The NCHF strongly recommends that the Productivity Commission give favourable consideration to recommending to the Australian Government the concept of 'Heritage Care', as a means of immensely improving heritage conservation and providing assistance to private owners of heritage properties through voluntary community involvement at the local level (especially within rural areas).

Historic Heritage Places

Although it understandably focuses on architectural/built heritage, the draft report does not adequately deal with other important aspects of historic heritage in Australia for instance, historical archaeological sites, cultural landscapes, industrial sites, and

shipwrecks. All have significant and specific issues, and many demonstrate examples of market failure.

In its present form the report gives a narrow and building-centred impression of our heritage and its problems. It is recommended that the final report rectifies this.

Role of the Commonwealth Government

As noted above, review of the submissions to the Inquiry will reveal that state heritage agencies and NGOs identify as a problem the lack of leadership at the national level. It is not necessary to recap the arguments here in detail. However, the NCHF considers that the lack of national leadership and the failure so far of the Commonwealth and the States to reach agreement on a range of standards for heritage listing and management for Australia is a significant hindrance to achieving an effective national heritage system.

There are many problems arising from this situation – for example, some types of heritage places are not sufficiently protected by heritage legislation at State/Territory levels, and there are no minimum standards for the protection of local heritage on which to base listing and instruments such as VCA's.

It is recommended that in its final report, the Productivity Commission give more consideration to the role of Commonwealth Government.

Role of the Register of the National Estate (RNE)

The Productivity Commission is incorrect in stating that the Register of the National Estate does not provide any form of statutory protection (p. 155). The RNE can provide a measure of protection as a trigger under sections 26 and 28 of the EPBC Act; and section 391A of the Act provides that the Minister must have regard to the information in the RNE in making any decisions under the Act.

While the Australian Government and Australian Heritage Council have yet to clarify the future operations of the RNE, NCHF has been consistent in its view the RNE still fulfils an important role, especially in the absence of agreed Commonwealth /State and Territory procedures for protecting those places on the Register, which are not currently protected under State or Territory law. This is discussed in more detail in the attached NCHF Position Paper, which has been forwarded to the Minister, DEH and the Australian Heritage Council. Also, given that the RNE lists significant places of natural and Indigenous heritage as well as historic heritage, and given that many properties on the Register have multiple values, it would be unnecessarily pre-emptory of this Inquiry into just one slice of Australia's heritage to suggest its removal.

It is recommended that the Productivity Commission reconsiders its findings about and proposed changes to the Register of the National Estate (taking into account the NCHF paper on this subject, which is attached to this submission).

Integration of Natural, Historic and Indigenous Heritage

NCHF considers it very important that Australia's heritage be treated as an integrated whole, rather than split into these artificial divisions, which compartmentalise heritage artificially, and which do not reflect the community's view of this heritage or their understanding of it. This is particularly concerning in that it could wrongly imply or suggest that Indigenous people and culture are apart from Australia's history and the contemporary celebration and recognition of Australia's heritage.

NCHF is aware that the terms of reference for the Productivity Commission in this Inquiry are limited to the historic environment. However, the NCHF would welcome a statement from the Commission that the artificial separation of these three parts of our heritage in some jurisdictions is a significant issue, which needs resolving.

While strictly outside the terms of reference for this Inquiry, it is strongly recommended that the Productivity Commission acknowledges in its final report that delineating 'historic' heritage in this way (and specifically excluding Indigenous history and culture) is artificial and out of step with the concepts underpinning the Australian Government's own statutory and administrative arrangements.

Summary of Recommendations

1. The NCHF recommends that all submissions and commissioned research be made available to the Australian Government (including the Australian State of the Environment Committee) for permanent storage and future reporting uses.
2. The NCHF recommends that a broader range of recommendations arising from the evidence available to the Inquiry (and discussed in the text chapters of the draft report) be brought more clearly into the Final Report.
3. The NCHF recommends that, in its final report, the Commission should amend its recommendation for voluntary listing as the sole basis for heritage conservation, and instead recommend the implementation of a suite of measures for the historic environment similar to that in place for the natural environment. The concept of voluntary conservation agreements is supported as part of this package, but not as a pre-requisite for heritage listing.
4. The NCHF strongly recommends that the Productivity Commission give favourable consideration to recommending to the Australian Government the concept of 'Heritage Care', as a means of immensely improving heritage conservation and providing assistance to private owners of heritage properties through voluntary community involvement at the local level (especially within rural areas).
5. In its present form the report gives a narrow and building-centred impression of our heritage and its problems. It is recommended by the NCHF that the final report rectifies this.
6. The NCHF recommends that, in its final report, the Productivity Commission should give more consideration to the role of Commonwealth Government.
7. It is recommended by the NCHF that the Productivity Commission reconsiders its findings and proposed changes to the Register of the National Estate (taking into account the NCHF paper on this subject).
8. While strictly outside the terms of reference for this Inquiry, it is strongly recommended by the NCHF that the Productivity Commission acknowledges in its final report that delineating 'historic' heritage in this way (and specifically excluding Indigenous history and culture) is artificial and out of step with the concepts underpinning the Australian Government's own statutory and administrative arrangements.

**Attachment 1:
National Cultural Heritage Forum
The future role for the Register of the National Estate**

The RNE and the new heritage regime

Throughout the debate leading to the passage of the heritage bills there was strong community and National Cultural Heritage Forum (NCHF) member support for the retention of the Register of the National Estate (RNE), and that support was finally translated into a political commitment to retain the RNE.

Consequently, the RNE is now part of the new regime.

But what part should the RNE continue to play in national heritage identification and protection?

While the incorporation of the RNE into the new heritage regime poses certain dilemmas, the Forum believes that the strong support for its retention indicates a perception of major deficiencies in the statutory protection provided for heritage places across the nation.

The Forum therefore endorses its continuance, and advocates that its retention be utilised:

- to encourage the EPHC and the Heritage Chairs & Officials to commit to redressing identified statutory deficiencies (such the lack of capacity to register and protect Indigenous and natural heritage sites in some States and Territories); and,
- to form the core of a truly complete database of all places of value to the nation, the Australian Heritage Places Inventory (AHPI).

AHPI already contains summary information about places listed in State, Territory and Commonwealth Heritage Registers, and it is intended that this be further extended with the inclusion of other registers, government and non-government.

What is the purpose of the Register under the new regime?

While the *AHC Act 2003* is silent regarding the purposes of the Register, certain functions have been designated for the RNE under the new heritage regime. The *Explanatory Memoranda* provides the following:

The Register will be an information resource for the purposes of heritage promotion and education. Furthermore, the Minister for the Environment and Heritage will be required under a new provision (Item 37 of the Environment and Heritage Legislation Amendment Bill (No. 1) 2002) to consider, where relevant, information in the Register when making decisions on the impact of an action on the environment under the Environment Protection and Biodiversity Conservation Act 1999.

Why was there such strong community support for the retention of the RNE?

The RNE was the first, and remains the most complete register of heritage places nationwide. It is the only national list which attempts to cover places of most value and meaning to communities across all jurisdictions and thresholds of values.

As such, it provided and continues to provide recognition that local heritage places are part of the national set of places of value. While listing a place on the RNE provided little substantive protection, it did, and it still does, carry considerable moral suasion.

While it pre-dated effective State/Territory and finally Commonwealth statutory protection for heritage places, the RNE did, and does still, have the following virtues:

- It covered all three 'environments', and allowed for the registration of places with multiple and shared values across those environments;
- It registered and provided recognition of the value of places not necessarily well protected by respective State/Territory legislation, especially natural and Indigenous places;
- It provided a level of statutory protection for the registered places where Commonwealth actions were concerned, and allowed for the registration of significant Commonwealth owned and managed places. Neither function, except in the case of Australia Post, was provided by State/Territory legislation. This allowed for the Commonwealth story to be told;
- It provided the first picture of heritage places nationwide, and continues to contain the most complete set of data concerning heritage places assessed to a consistent standard and criteria across the nation. This facilitated research, informed management and decision-making, and provided data for activities such as State of the Environment reporting;
- It provided registration for nationally significant places, allowing for the national story to be told.

What role/function is the RNE currently providing?

The community continues to value the RNE, and will continue to value the national recognition and moral suasion brought by RNE listing, regardless of its actual statutory powers, until they are absolutely certain that their special places can be, and are actually being fully protected by State/Territory and local jurisdictions.

Therefore, there will be a continuing role for the RNE to provide a 'safety net', until effective statutory protection across all three environments, down to places of local significance, is provided in all jurisdictions.

Equally, until there is a fully effective schema for ensuring that data concerning all heritage places from statutory and non-statutory lists is fully captured and made available, ideally through a publicly accessible database or similar 'one-stop-shop' arrangement, the RNE will continue to be a vital research tool regarding the state

and condition of heritage places nationwide, especially with regard to State of the Environment reporting.

What then should be the long-term vision for the RNE?

Until Australia has seamless, fully integrated and effective heritage protection legislation across all environments, the RNE should continue as a statutory register, able to provide a safety net for places of State/Territory and local value which have inadequate statutory protection within their own jurisdictions.

Once that standardised and seamless heritage protection has been achieved across the nation, the RNE will still need to be retained as an essential database filling the gap between State/Territory registers and the new national registers, unless the RNE data has all been formally accepted into other appropriate statutory databases.

This will require:

- reform of State/Territory and local statutory protection (through the EPHC and Heritage Chairs and Officials) so that all natural and cultural (including Indigenous) heritage places across the nation are able to be adequately protected within their own jurisdiction;
- standardising of thresholds across jurisdictions so that levels of significance accord nationwide, and agreement that places from all three environments will be protected within their jurisdictions;
- consolidation of all statutory and non-statutory lists into one readily accessible meta database, the AHPI.

Until these measures are completed, the RNE should continue to be developed:

- as the core of the development of a national heritage places database – the platform for the *Australian Heritage Places Inventory*;
 - as the place to record the National or Commonwealth Heritage values of places which the Minister declines to register on the National or Commonwealth Heritage Lists;
 - as the place to record the values arising from thematic studies which document the values of a range of places, few of which are likely to end up on the National Heritage List itself;
 - as a list of places where the relevant jurisdiction declines or is unable to recognise the place (hopefully this will be relevant in fewer and fewer instances as national standardisation of State/Territory registrations and more comprehensive and wider integration of protection occurs);
 - for State of the Environment reporting, as it is the only list able to provide a national and consistent overview of information about the state and condition of heritage places nationwide.
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***National Cultural Heritage Forum
December 2003***

