

ICOMOS NEW ZEALAND
TE MANA O NGA POUWHENUA O TE AO
INTERNATIONAL COUNCIL ON MONUMENTS AND SITES

28 February 2022

The Hon. Kiri Allan,
Minister of Conservation,
Parliament Buildings,
Wellington

Dear Minister Allan,

I am the Chair of the New Zealand National Committee of the International Council on Monuments and Sites (ICOMOS). ICOMOS is an international non-governmental organisation, founded in 1965, comprising heritage professionals from round the world, dedicated to the conservation and protection of places of cultural heritage value¹. It is UNESCO's principal advisor in this field. It has an international membership of 10,000 expert heritage practitioners from over 130 countries.

The New Zealand National Committee of ICOMOS was established in 1987. It has 140 members made up of professionals with a particular expertise and interest in heritage matters, including architects, engineers, archeologists, lawyers, heritage practitioners and planners. The ICOMOS NZ Charter, is unique among member countries in that it includes recognition of our indigenous cultural values. This Charter (attached) is widely used throughout Aotearoa New Zealand and provides a recognized national benchmark for cultural heritage conservation standards and practice.

I wish to raise the following connected matters on behalf of the ICOMOS NZ membership and the cultural heritage of Aotearoa New Zealand:

1. World Heritage – When will this be made a priority by the Department of Conservation?
2. Built Heritage – Why is this not promoted as strongly as natural heritage by the Department as cultural assets in conjunction with meeting NZ's sustainability goals?

¹ Places/sites of cultural heritage value may include buildings and other structures or monuments, gardens, archaeological sites, townscapes, settlements and sacred places.

Firstly, I note that you yourself are in a very unique position between three complimentary portfolios that includes *Arts, Culture and Heritage, Conservation, and Environment*. Having someone involved across these three areas is very advantageous for the continuity and collaboration that cultural heritage entails.

World Heritage (UNESCO World Heritage Convention)

I wish to express deep concern about New Zealand's lack of progress with World Heritage listing of our own heritage sites. There are three areas of work in which New Zealand need to be involved: maintenance of the tentative list, consideration of a nomination for inscription, and monitoring and reporting on current inscribed sites.

It is 20 years plus since New Zealand acquired the World Heritage listing of two natural properties and one mixed natural and cultural property; the absence of any further listings over the last two decades – either natural or cultural heritage – is, to us, a very serious deficiency in process and progress. The first step in any process of listing World Heritage sites is that the relevant State Party must establish a tentative list of a range of candidate sites before any site can be considered for formal listing. The Department of Conservation is the entity delegated this task on behalf of the Government and also has the responsibility to develop detailed cases for consideration relating to individual sites for formal listing. DoC prepared a tentative list² in 2006. I note that in the World Heritage Convention Operational Guidelines “*State Parties are encouraged to re-examine and re-submit their Tentative List at least every ten years*”.

New Zealand is currently one of very few countries in the world where there are no individually listed cultural heritage sites, other than the ‘associative’ values of Tongariro, noting also that Tongariro is the first listed cultural landscape on the World Heritage list. However, the current listed properties do not provide a balanced view of New Zealand to the world.

One of the key tasks of the international ICOMOS organization is to undertake, through using ICOMOS experts from around the world, assessment of nominations for World Heritage listing as well as monitoring those already listed. Our three listed properties³ compares poorly with Australia, which has 19 listed sites achieved by following an active program of nominations.

One of the key functions of the New Zealand Conservation Act 1987 includes “the promotion of the benefits of international cooperation on conservation matters”. Our national committee considers there to be a range of properties in New Zealand that should qualify for being listed - both cultural heritage and natural sites, including those on the now 16-year-old tentative list. Based on international experience, cultural heritage sites in particular are often highly attractive to tourists, both international and domestic. Despite such benefits I could not find mention of World Heritage listing in the recent briefing to Ministers from Doc staff.

² Kahurangi National Park / Farewell Spit / Waikoropupu Springs / the Canaan Karst System; seabed and waters of Fiordland (Te Moana o Atawhenua) - an addition to Te Wāhipounamu; Napier Art Deco historic precinct; Kerikeri Basin historic precinct ; Waitangi Treaty Grounds historic precinct; Kermadec Islands and marine reserve; Auckland volcanic field; Whakarua Moutere - or the North-East Islands (including Poor Knights Islands).

³ Te Wahipounamu – SW New Zealand (1990); Tongariro National Park (1993); Sub Antarctic Islands (1998)

New Zealand no longer has an effective and coordinated structure, connecting the relevant entities and their expertise to best organise World Heritage listings. The legal responsibility at present lies with one department, DoC, which has expertise in natural heritage sites. The Government charged DoC with review of World Heritage listings at the commencement of its first term four years ago but no progress has been made.

The Ministry of Culture and Heritage (including Heritage New Zealand) has no legal responsibility but has expertise in cultural heritage sites. ICOMOS New Zealand has significant experience in how best to prepare both tentative lists and to draft detailed cases for formal listing. We would like to discuss how to achieve an optimum and cost-effective solution to progressing the World Heritage List, which may remain with DoC, or under another designated Minister, if Doc is under-resourced to do so.

Heritage Conservation – Built Heritage

I acknowledge that your “*responsibilities include promoting conservation of the natural and historic heritage of New Zealand*”. The keyword here is promotion and we feel that there is not enough emphasis on buildings conservation. However, it is understandable that this may be seen as the remit of Heritage New Zealand Pouhere Taonga, MCH (in regards to cultural heritage) or even MBIE (in regards to Building Performance), but only in limited capacities.

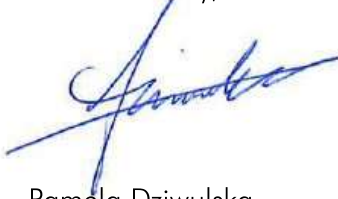
I very much see an opportunity for improving the promotion of conservation of buildings in their own right. There are also mutually-beneficial aspects to the retention of this form of cultural heritage for meeting climate change and environmental emissions targets – retaining built heritage and, where possible (and appropriate), adaptive re-use of buildings, prevents established embodied energy in wholesale buildings and their materials being sent to landfills. These include native timbers such as kauri, rimu and totara, locally quarried limestone for both building blocks and burning to make lime mortars (historic mortars) followed by modern cements, and the energy and resources used to mould and fire bricks.

I feel it would be very beneficial to meet with you in person (or in the case of Covid-19 Restrictions, online) to discuss these issues in more depth.

I wish to thank you for taking the time to read this letter, hear our concerns, and hope that you will consider our suggestions. We have written this letter with careful consideration and in the spirit of exploring solutions to current challenges. I look forward to your reply.

“The greenest building is the one already built.”

Yours faithfully,



Pamela Dziwulska
Chair ICOMOS New Zealand