

12 July 2023

Heritage Tasmania  
GPO Box 618  
Hobart TAS 7001

Dear Sir or Madam,

#### **INVITATION FOR COMMENT – DRAFT HISTORIC CULTURAL HERITAGE AMENDMENT ACT 2023**

Reference is made to invitation of the 26<sup>th</sup> May 2023 providing the opportunity for public comment on the *Draft Historic Cultural Heritage Amendment Act 2023* (the Act).

Hydro Tasmania would like to provide its broad support for the proposed amendments to the Act, principally those aspects that enhance of existing protections and procedures relating to places on the Tasmanian Heritage Register, and the introduction of protections and procedures for Heritage Objects (movable cultural heritage management).

As you would be aware Hydro Tasmania manages many places and objects of historic heritage significance, including two heritage-registered places, the Lake Margaret Power Station, and Great Lake Power Scheme including Waddamana Power Station Heritage Site.

These assets tell us about the cultural values and industrial developments of their time. We take responsibility to maintain and protect our operating assets, and to document and conserve heritage values both during and after their operational life.

Notwithstanding our broad support for the proposed amendments, the introduction of Heritage Objects as a class of regulated cultural heritage raises a number of queries.

Firstly, it is noted that while the possible listing of an object requires that it contributes to the historic cultural heritage significance of a place, this has the potential to be very broadly interpreted. By way of example, Hydro Tasmania has an extensive collection of heritage objects that have both direct and indirect provenance to assets and places across Tasmania. As such it is recommended that consideration is given to the provision of statutory guidance regarding the scope of potential objects that would be covered by these provisions.

Secondly, that the substitution of the new Section 43 (Effect of minor works approvals) identifies reference to that 'conditions in the approval' in respect of minor works approvals. This would appear to be a shift from the current model of exemptions which does not specifically stipulate or regulate conditions for this class of approval. It is recommended that clarification on the purpose and need for conditions on minor works permits is provided to better understand the implications of this provision.

Should you wish to discuss any aspect of this submission please contact me on 0402 822 265 or at [ian.jones@hydro.com.au](mailto:ian.jones@hydro.com.au).

Yours sincerely,



Ian Jones MPIA CPP  
Hydro Tasmania