



IntangibleCulturalHeritage  
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Consultations

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**Dear Sir**

**Re: Consultation on the 2003 UNESCO Convention for Safeguarding of the Intangible Cultural Heritage (ICH)**

The Institute of Historic Building Conservation is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

We are very pleased to have the chance to comment on the consultation document. The Institute's comments are as follows:

**Broad Observations on the initial text:**

The document makes the key point that intangible cultural heritage is distinct from traditional fixed or material heritage. It states also that "*Intangible Cultural Heritage is far broader crosses different cultural sectors, has less criteria, and is owned by people themselves.*" However we suggest that this sentence does not really reflect the essence of the UNESCO definition. A sentence from that definition would be preferable in the following terms: Intangible Cultural Heritage "includes traditions or living expressions inherited from our ancestors and passed on to our descendents, such as oral traditions, performing arts, social practices, rituals, festive events, knowledge and practices concerning nature and the universe or the knowledge and skills to produce traditional crafts.

IHBC practitioners would have a high level of awareness of the juxtaposition of ICH against 'material, fixed heritage'.

The consultation emphasises the importance of the relationship between intangible heritage and historic places, but IHBC would urge DCMS to provide greater clarity and guidance for built heritage practitioners concerning managing the interdependency between the conservation and/or management of historic fabric and the safeguarding of cultural practices. IHBC supports the continuation and relearning of the skills needed to keep alive fixed, place-based material heritage and thus makes tangible an aspect of intangible heritage. Languages related to traditional building skills, materials and parts become tangible as soon as you can point to and name something solid.

Concerning the three definitions selected from UNESCO: 1. Community-based, bottom up; 2. Inclusive and respectful and 3. Open and engaged they are all key. The statement about 'open and engaged' that 'one reason for ratifying the Convention is to start a conversation about ICH to help identify, recognise, value and safeguard it' is really important because the starting point prior to any designation is the identification and the process that will be established to do this.

The proposal for the first phase of implementation to be the creation of an inventory makes complete sense as does the approach to drawing on existing inventories and collating them in a compatible manner into the UK National Inventory of ICH. We believe the second stage of implementation safeguarding and how that looks is a good approach in that the committee structure is acknowledging the inclusive way of exploring, identifying and considering what actions could be taken to increase and improve the safeguarding of ICH in the UK. We believe that the acknowledgement of the role of strong community participation in a representative respectful and transparent manner sounds like a very reasonable and cautious approach.

The indication that the UK will not focus on nominating items of ICH to the list for the first few years following ratification is understandable and we believe the right approach. However we believe that the statement that the ICH "has no exceptional universal value and is not necessarily original or unique" is not correct. If one considers some of the entries on the ICH list such as the Vanuatu sand drawing, a unique and complex tradition of sand drawing which is "multifunctional writing and is more than an indigenous artistic expression which 'occurs in a wide range of ritual, contemplative and communicative contexts' or the unique culture of the Haenyeo women sea divers from the island of Jeju, South Korea. We would accept that the idea of listing just a few with UNESCO is an understandable approach.

We question whether the sentence "*intangible Cultural heritage is the 'verb' of cultural heritage, as opposed to the noun of 'tangible' heritage*", is helpful at all. The definitions in the Convention are framed in a broad way so as to provide an

understanding of what ICH is, rather than give a restrictive definition of ICH which is what is being advanced in the consultation. As an approach we believe it would be more helpful prior to addressing the criteria to first describe the domains a) to e) in which ICH is manifested.

In relation to the passages on criteria such as “*The Intangible cultural heritage must be currently practiced*” we suggest that this could also be worded “*The ICH must be living heritage.*” Then in our view there would be no need at all for the statement that “*the Inventory is not intended to be an historical record of previously practised Intangible Cultural Heritage, but to reflect the current living Intangible Cultural Heritage in the UK. This would also mean the inclusion of a practice if it had previously stopped but been brought back and was currently practised.*”

Further we suggest that the Criterion that “*The intangible Cultural Heritage can be from any time*” is superfluous. We do not believe that the statement that Intangible Cultural Heritage is “*Traditional, contemporary and living at the same time: intangible cultural heritage does not only represent inherited traditions from the past but also contemporary rural and urban practices in which diverse cultural groups take part;*” is needed nor is the statement ‘*We therefore do not place a historical start point or minimum ‘age’ for any item to be included in the Inventory*’ necessary or helpful.

The criterion that ‘*The intangible cultural heritage can originate from anywhere*’ might consider expressing the concept that intangible cultural heritage can emanate from diaspora communities.

The criterion that ‘*ICH must be a living practice and cannot be a material product or object*’ is not helpful where it states that “*Whilst the Convention text refers to “...the instruments, objects, artefacts and cultural spaces associated therewith” that may be recognised as part of cultural heritage, these are not Intangible Cultural Heritage themselves*’. We suggest that the skills and techniques used in the production of many objects and artefacts are part of ICH as well as the object or artefact produced.

The statement that ‘*ICH does not specifically include language in of itself for which DEFRA does not hold policy responsibility*’ and the statement “*Languages will necessarily be closely linked with a number of oral traditions, but are not considered Intangible Cultural Heritage on their own*” might be expressed the other way around and used in a similar way to the domain description “oral traditions and expressions including language” as a vehicle of the intangible cultural heritage.

IHBC would also like to emphasise the importance of the Welsh language in the context of ICH and in particular in supporting the success of the Cymraeg 2050 strategy.

## **Responses to the questions raised**

### **1. For each of the criteria, please indicate whether you:**

- a. **Strongly Agree**
- b. **Agree**
- c. **Neither**
- d. **Disagree**
- e. **Strongly Disagree**

NB: Please see broader comments above.

### **Please add any additional comments here...**

We also suggest that the statement that ICH is not widely used or generally known in the UK is not correct. We accept that within communities it will be helpful to raise awareness of the term and its meaning. However most cultural heritage practitioners would be familiar with and sensitive to these aspects in conjunction with the protection of cultural heritage more generally.

### **2. Are there any criteria in addition to the above that should be added in your view?**

Please note our comment about commencing with the list of domains within which the criteria could then be considered as it makes them easier to understand as people can associate them with examples.

IHBC note that our intangible music heritage is poorly understood or represented. We reference the precarious state of the native musical tradition of England, Scotland and Wales, and wish to advocate for it to be properly understood, valued and supported and that it is opportune to do so in the context of the debate within this consultation..

**Community permission: The statement that “*The role of the ‘Community’ in Intangible Cultural Heritage is important in terms of recognition, or owners of items of Intangible Cultural Heritage.*”** is inconsistent with earlier observations about objects and artefacts made already and the concept of ownership does not sit well either.

The statement that the definition of communities is not clearly defined is not quite true. Communities should not necessarily be defined in a territorial manner as the term community can be broadly interpreted in the context of heritage and could be made up of a number of communities within one community. However the important aspect referred to here is the principle of respectfulness associated with the necessity of obtaining the free prior and informed consent of communities.

We believe that the proposal to represent the community that authentically practices a particular ICH is pragmatic and the intention to look for evidence of authentic practice within a community of an item which is being submitted will be a manifestly good practice and will reflect the intention of transparency referred to.

**3. Are you supportive of the concept of community representation? If not, why not? What suggestions do you have for obtaining support for a community for a submission to the Inventory?**

- a. **Strongly Agree**
- b. **Agree**
- c. **Neither**
- d. **Disagree**
- e. **Strongly Disagree**

**Please add any additional comments here...**

The text of the consultation does not really convey the sense of celebration of the dynamism associated with a community coming together and seeking recognition for their ICH. Also in the consideration of obtaining community support best practice for communication and engagement with communities might require guidance

**4. What are your views on the 5 categories?**

- a. **Strongly Agree**
- b. **Agree**
- c. **Neither**
- d. **Disagree**
- e. **Strongly Disagree**

**5. What are your views on the additional category of Traditional games and sports?**

They could come under social practices to allow alignment of the UK inventory with the international one should an application be made for inclusion

**6. What are your views on the additional category of Culinary traditions / knowledge?**

If games and cookery already have places in international inventories then the UK and its national components should align with these, as you suggest, and not have some separate categories, beyond the purview of UNESCO. They could come under knowledge and practices concerning nature and the universe to allow the alignment of the UK inventory with the international one should an application be made for inclusion.

**Should there be any additional categories? No**

**8. Are you supportive of our intended approach to the approvals process?**

- a. **Strongly Agree**
- b. **Agree**
- c. **Neither**
- d. **Disagree**
- e. **Strongly Disagree**

**9. Are you supportive of our intended approach to reviewing the inventory?**

Period of review should be less often eg every three years

Yours sincerely

Fiona Newton

IHBC Consultations