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Who’s Talking? Outputs in Cultural Resource Management and the Threat of RMA Reform

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Publication and Cultural Resource Management

Simon Bickler’s comprehensive guide to Cultural Resource Management (CRM) archaeology practice in New Zealand had the following challenging statements:

‘... archaeology in New Zealand is CRM archaeology first and foremost.’ (Bickler 2018:315).

...CRM archaeology is the New Zealand archaeology in the 21st Century.’ (ibid,319)

‘... there is a dynamic engaged and growing CRM-based archaeology of New Zealand.’ (ibid,321)

In terms of volume of work undertaken the first two statements are unquestionably true. The value of the outputs of CRM is more open to question. One test of all the primacy asserted must be the degree to which significant results are expressed in published work.

Table 1 is the result of the survey across three journals which receive the most. No doubt there are some papers beyond this net.

Table 1: Decade 2010- 2019 CRM Publication Statistics

Journal	CRM Derived	Total Papers	Proportion
Archaeology in New Zealand (AINZ)	40	105*	38%
Journal of Pacific Archaeology**	12	37	32%
Australasian Historical Archaeology**	6	14	43%

* Discounting reviews, obituaries, statistical surveys etc.

** New Zealand subjects only

The overall total of 58 papers did not seem inconsiderable and the proportion of CRM papers in the totals seemed impressive. By some standards of course publication in the non-refereed AINZ does not rate. But then also considered was the paper yield in relation to the number of Heritage New Zealand

Pouhere Taonga (HNZPT) archaeological authorities (hereafter ‘Authorities’) issued in the decade, where there were 4620 (excluding emergency ones of which there were many, mostly as a result of South Island earthquake events). Most of the non-emergency ones would have related to CRM practice. It was also considered in relation to the number of consulting archaeologists working, most of whom would have had work dominated by CRM, where Coster (2020) gives us figures to derive an average of 65 archaeologists working in the field across the decade. Some rates of publication then emerge:

CRM derived paper yield of HNZPT (non-emergency) Authorities
= $58 / 4620 = 1.2 \%$
CRM derived paper yield per consultant
= $58 / 65 = 0.9$ papers per decade.

A CRM report rate can also be derived:

Reports dated 2010 to 2019 in the HNZPT Digital Library per consultant = $5391 / 65 = 83$ reports per decade.

In respect of reports per consultant it must be noted that some consultants may not concentrate on Authority work and hence produce few such reports. One should note that a governing legislation change in 2014 affected the need for Authorities in some situations. A few of the Authorities would be non-CRM and some of which would be for monitoring around sites where archaeology was being protected and hence unlikely to be of publication generating potential. Certainly some results from some Authorities may be quite trivial – that is the precautionary nature of the process as it is run by HNZPT. Some Authorities are never exercised – the need for the work ceased.

Despite these qualifications, on these measures the rate of formal publication seems low, by the professed standards of a 1960s introduction to archaeology dismal. Of course these investigations produce reports, just not published ones, and that is their primary purpose. Clearly the world has changed. If this is a serve to CRM archaeology the other part of the archaeological world is not excused for while they produce papers, too much of their output is behind paywalls – their bubble.

Also worthy of note is Bickler’s (ibid,292) enumeration of articles in the HNZPT run magazine *Heritage New Zealand* where CRM gets a poor showing, though casual inspection would suggest it has since improved.

To get a feel for recent CRM reports, next looked at were the reports in the digital library loaded in 2020, up to late October. There were 54 in total of which many had ‘monitoring’ or ‘interim’ in their title or were on horizontal infrastructure where it was likely that monitoring was the aim. These were bypassed. Of the 27 downloaded and read, 20 turned out to be brief reports mostly of monitoring. Some were reporting on emergency authorities. The seven remaining had significant archaeological information. All of these had a summary or a conclusion which would have been useful to HNZPT, for whom they were being written, or another archaeologist working in the area who consulted it as part of another project. They varied in their frequency of references to other CRM reports, some self-referencing frequently, others sparingly, but that perhaps reflected a low frequency of previous work in an area. Only two had any general statement of the significance of what they were reporting that might be intelligible to inexperienced clients, or to the general public who might find their report on the digital library. None attempted to give a Māori perspective on the findings in respect of sites of Māori archaeology. Perhaps there is a more active role for Iwi monitors needed here? In the judgment of the present author two of the seven had material that could have been worked up into a publishable paper. The modest scale of the work limited this for the vast majority. A pandemic year (the filing rate a quarter of that of 2019) might deliver a distorted sample of reporting, but on this sample, a report in the digital library alone is a reasonable expectation of much CRM archaeology, not frequent publications.

In this author’s introduction to archaeology in the 1960s publication was an objective of research (e.g. Green1963:5). No doubt it was strongly influenced by the need for those in academia to build a personal history of publications, preferably in prestigious journals. Such a motivation is still there with the small minority of archaeologists that work in universities. Publish or perish is their driver. Publishers worry about their journal rankings, several published lists exist that they agonise over, as should academic writers about their citation frequency. But as well, having a backlog of unpublished excavations was considered a bad look – one was destroying sites to no good outcome. A consequence was that shorter or preliminary reports often went to the likes of the *NZAA Newsletter*.

When I undertook a review of Bay of Plenty archaeology for the Department of Conservation (Law 2008) in their regrettably discontinued series, one had to delve into what then really was grey literature of the CRM work undertaken. It was tracked in many places before there was an adequate coverage. There were gems amongst it, which materially added to the conventional literature, though my editor was quite dismissive of my citing

so much of it. It had some debates amongst it – for instance on the origins of carbonized bracken fern in modified coastal dunes, but these were internal to the CRM community of the time carried out through the reports alone. Reference to other CRM reports was often voluminous, which was welcome, as it was how many were first recognised.

Now such literature is grey no longer (Bickler 2018: 304) – HNZPT assiduously collects the CRM reports that derive from its Authorities and makes them available digitally to all – <https://www.heritage.org.nz/protecting-heritage/archaeology/digital-library>

There is a useful search tool there and browse options, but with so many reports the ability to discriminate as to their value is limited and one doubts if it attracts many casual visitors. For Aucklanders, an alternative way into the literature is the Auckland Council Cultural Heritage Inventory – <https://chi.net.nz/>

Rather than formal publication it is clear the production of unpublished reports is seen as sufficient by the consulting profession. Informal standards for this reporting do exist – it is not an escape from standards, like the peer review of journals, though O’Keeffe (2020:42) has a less sanguine view. Archaeological consulting practices often have internal peer review and those competing for work, as most do, leapfrog each other on fieldwork, analytical work and reporting, for both productivity and standards. Some are engaged to review the work of others, usually assessments, particularly for adversarial planning hearings and court processes. This is a driver and test of standards, if emotionally challenging.

While one cannot excavate without continually setting oneself mini-experimental tasks (e.g. ‘I think this pit is older than that one, I will test that by excavating at their intersection’) are we setting broader research questions in excavations either across New Zealand, or regions or some particular aspects of the past? HNZPTA has attempted to set such a research framework in the past – and has asked Authority applicants to cite research objectives for their proposed work. Bickler is dismissive of a framework draft of 2007: ‘... most of the themes had little to do with CRM work and would have been too rigid to implement in any constructive manner with no defined desired outcomes to measure what contributions might have been made’ (Bickler 2018:316).

The HNZPT *Statement of General Policy* (HNZPT 2015) states at section 5.5 that HNZPT will develop national and regional research frameworks ...

Law – CRM Archaeology Outputs

to evaluate proposed archaeological work and to focus any research required as a condition of an archaeological authority towards specific questions relating to New Zealand’s past. None yet exist.

A client could tick off Authority reports as compliance but I doubt many would have felt they had made any contribution to knowledge. Yet the ‘Fieldwork and Other Activities’ column in AINZ regularly reports brief notes on interesting work, which one hopes will see further publication, but in practice the work rarely results in any formal publication.

If CRM archaeology is engaged with a wider academic field then one can ask, is it being cited? Google Scholar is one way of looking at this (Table 2).

Table 2: Google Scholar Search Results for CRM Terms

Search Term common in CRM report titles	Responses including citations	Responses less citations
Pouhere Archaeological	425	369
Pouhere Authority	551	528
New Zealand Historic Places Trust Archaeological	24,200*	21,800
New Zealand Historic Places Trust Authority	106,000*	105,000
NZHPT Archaeological	365	277
NZHPT Authority	370	326

Searches as at Oct 2020.

* Google rounding to thousands and hundreds respectively.

As shown, the alternative searches using the abbreviations HNZPT and NZHPT produce much lower numbers, but inspection of results for the longer form shows most responses are not CRM reports, so these searches are best disregarded. Some reports with both ‘archaeological’ and ‘authority’ in the title will appear in both alternative searches. In comparison the search term: ‘Zealand archaeological’ returned 104,000 responses. The number of reports in the digital library is currently 8,142. Subtract the last column of the Table 2 from the middle to get citations and the number is modest, most likely hundreds, a small yield from the thousands of reports. Note though, a potential source of citations might be the online *Archaeology in New Zealand*, but it is not scanned by Google Scholar. Clearly CRM reports are not recovered at a high rate or much cited in the literature scanned by Google Scholar. It would appear that the CRM reports are largely internal communication within an engaged CRM community.

Archaeology of the Māori

Unquestionably there are many reports of the stuff of archaeology of the Māori in the digital library. I would define this stuff as: ‘both landscapes and the many small sites of terraces, drains, postholes, pits, shell midden, cooking / heating features, sometimes obsidian, in site-internal layouts, sometimes with associated gardens.’ Rarely does one site of this stuff of Māori archaeology mean much in itself. It is only collectively that they might.

How are we to derive history from them? One hopes one can – but if one considers the strictures of Binford (1972:138-9) that If you want to compare information from sites, you need a research design to sample them in a landscape, sample within them and analyse the finds by consistent methods and further the contempt of Charles Darwin for mere observation: ‘How odd it is that every one should not see that all observation must be for or against some view, if it is to be of service.’ (Darwin 1861), then one can only be wary that we are on track to bring new truth from this material.

Another dictum is that collecting data without analysis fails to expose weaknesses in the data collection. CHI reports are not ever dispassionate reports of what is found. What is found is conditioned by what we see or seek to see, and the methods used. It is a view of archaeological data that precedes postmodernism, even if it sounds like it. O’Keeffe reviewing CRM archaeology in New Zealand observed: ‘There is little consistency of approach, methodology, criteria, or interpretation’ (2020:42) which suggests there is a problem. HNZPT does have some guidance on its website: a thin guide to research strategies and a more material one for midden sampling and analysis, which commendably opens the breadth of potential information, rather than providing a recipe book.

It is an old challenge derived from what we might once have wanted to see: ‘... archaeology must deal with the kind of evidence that is available The limitation on archaeology in New Zealand is not the lack of ‘diagnostic’ artefacts but lack of analysis’ (Ambrose 1966:73). Allen though is optimistic: ‘..... it is in the excavation of lowly ranked middens, terraces and pit sites where new, and often complex, evidence is emerging concerning how Māori people used the prehistoric landscape.’ (Allen 2020:8).

One has to ask, what is the mechanism by which this synthesis will emerge? Some CRM derived papers are published. There is some engagement of academics in CRM work and some CRM practitioners do return to academia to complete higher degrees, with theses built around data from their past

career, but it is hard to see that is enough. Bickler (2018:318) sees: ‘There is a desperate need to improve the research incentives for New Zealand CRM archaeologists’ whereas O’Keeffe (2020:43) sees both a national research agency and a professional institution being needed to give direction. Both are commenting on more than the archaeology of the Māori but it is no less apposite.

Inputs / Outputs and the Threat

In an economist’s terms in a money centred view of the world, archaeology is an opportunity cost. If we did not have to do archaeology as a cost of development, or accept the added cost of avoiding sites, the cost of delay and the avoided direct cost of doing it, would be a benefit through funds finding other opportunities. This of course treats saved sites and recovered archaeological information as an externality – not costed by a developer as a benefit from the expenditure of their time and money. Any other economic treatment is problematic. Archaeological outputs or protection in place have values largely external to monetary ones. Publicly funded services often have to consider themselves in terms of their inputs and outputs. A good part of CRM is ultimately publicly funded albeit often indirectly through Crown fully or partly owned businesses and Council Controlled Organisations. The inputs include: the cost of about 100 archaeologists working as consultants, the central and local government agency costs in undertaking the consenting processes related to these and delays to development projects while archaeology happens.

The outputs of CRM archaeology are: archaeological heritage protected in place (some at least through avoiding the cost of excavation), thousands of reports in the HNZPT Digital Library – very accessible to the public but of very limited use to them and other publications – not many - most of little public comprehension or accessibility. Some book chapters of more general interest exist. Who judges if these inputs and outputs balance? – ultimately it is those who determine what the legislation says - Parliament. It balances benefits with the externality costs. CRM archaeology is underpinned by two Parliamentary Acts – Heritage New Zealand Pouhere Taonga Act and the Resource Management Act (RMA).

Currently both major parliamentary parties have as policy; to repeal the latter and replace it with two new acts, but that number might be all they agree about on substance. The content of the new acts will be contested. The survival of anything equalling the RMA section 6(f) matter of national importance:

‘the protection of historic heritage from inappropriate subdivision, use, and development.’

cannot be taken for granted. The Government policy to replace the RMA is underpinned by the outputs of a Review Panel, the full version of which is 531 pages long. Specifically the working paper says: ‘Current matters of national importance should be replaced by positive outcomes specified for the natural and built environments, rural areas, tikanga Māori, historic heritage, and natural hazards and the response to climate change.’ (2020b: 9). So rather than the current national importance matter the working paper proposes a shift to:

‘... those exercising functions and powers under it must provide for the following outcomes: Historic heritage, (p) protection of *significant* historic heritage; ...’ (Resource Management Review Panel (2020a: 79, emphasis added).

The addition of ‘significant’ suggests someone is pushing back against what gets protected in plans, what gets considered when planning consents are granted or not. Such a provision often requires testing in courts, to set parameters around the term ‘significant’, or it can be resolved by Government direction through statutory guidelines. The long coverage of historic heritage in the report (sections 61-107 in 2020a) is well informed and has progressive suggestions but fails to explain where ‘significant’ as an addition comes from or acknowledge that it might be a weakening.

More generally the paper proposes:

‘Specific outcomes should be provided for ‘Tikanga Māori’, including for the relationships of mana whenua with cultural landscapes’ and ‘A more effective strategic role for Māori in the system should be provided for, including representation of mana whenua on regional spatial planning and joint planning committees’ (2020b:8).

Nor is the RMA definition of historic heritage immutable. It is hard to see that such changes would be anything other than revolutionary for current CRM practice around planning law, particularly if the strategic role for Maori results. It may well disrupt the alignment between the planning and heritage acts that the 2014 HNZPTA attempted. Lobbying will be intense about the new planning acts – some will be overt, but business interests are often highly effective in lobbying without little outward sign, witness the long delays in doing much effective about carbon emissions.

To protect archaeologists' view of the value of both the archaeology protected in place and the information from the investigations otherwise undertaken, both need to be valued by the public at large. The archaeology of the Māori needs to be valued by Māori. Māori and the public at large influence what Parliament does. So CRM archaeology may have a problem in communicating broadly with other archaeologists but also a potentially crucial one in communicating with the wider audience, to protect its own existence.

Conclusions

New Zealand Archaeology is having a crisis of communication where the great majority of archaeological work derived from CRM is being considered largely within a narrow group of CRM practitioners. Information of use to a broader range of the New Zealand public does not seem to be emerging. It is difficult to see that the broader knowledge of New Zealand history is being best served. Given that CRM work is underpinned by legislation and a key piece of that – the Resource Management Act is proposed for replacement, the practice of CRM may well be challenged in that process both as to the value of its outputs in relation to the input costs and particularly in respect of its value to Māori. Its communication must be key to that.

So what is a consultant archaeologist to do?

- Worry about the relevance to broader society of what they are doing
- Worry about the relevance to Māori of what they are doing, in the archaeology of the Māori
- Seek to enhance its value, which may often only be by broader analysis
- Defend its value
- Communicate outside the CRM bubble.

What is needed more broadly?

- Further engagement with the process of replacing the RMA to assert and protect the value of cultural heritage
- More effective communication with the public as to the value of CRM archaeology, which must involve social media
- Ways of ensuring broader research objectives intrude into day to day CRM archaeology
- Better means of drawing results from CRM archaeology into broader analyses and syntheses. (See Bickler's chapters 10 and 11 for discussion and ideas).

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