

Submission to the Public Consultation on the Next National Cultural Policy

Individual submission

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The views expressed in this submission are the author's own and do not represent the position of any institution with which the author is affiliated.

Introduction

Getting Australia's cultural policy right matters. What "right" means, however, is a question the consultation paper has not asked, and this submission addresses it directly.

The document the Commonwealth is developing is, in substance, a policy for the arts and creative industries. That is a valuable thing to be, and nothing in this submission argues against it. But the use of the word *culture* throughout the consultation paper carries an inherited Victorian meaning – Matthew Arnold's meaning, culture as an accumulated canon of artistic achievement that can be funded, protected and exported – that misrepresents what culture is, misnames what the policy does, and forecloses the broader work a genuinely conceived cultural framework could do. The gap between what this document is and what it names itself is not a semantic inconvenience. It has practical consequences for what the policy can and cannot see, and for what it can and cannot do.

I write as an Aboriginal person whose work sits at the intersection of cultural theory, Aboriginal Studies and Australian public policy. The argument I advance draws on culturalist scholarship from Raymond Williams to Albert Wendt, and on the Aboriginal intellectual work of Martin Nakata, Aileen Moreton-Robinson and Karen Martin, as well as on research into the cultural foundations of Aboriginal policy failure developed in my recently completed doctoral thesis at the Australian National University. The submission's claim is structural: the conceptual architecture within which the policy operates is inadequate, and the argument is for a different architecture.

The submission makes one central recommendation – that the document being produced be titled to reflect what it actually is, a policy for the arts and creative industries (including the publicly-funded arts institutions, collecting museums, galleries and archives that constitute the sector as currently understood) – and five subsidiary recommendations that hold independent value but are each strengthened by the adoption of the central one. It proceeds as follows. It begins by establishing the inherited Victorian conception of culture in its origins and its specifically settler-colonial character in Australia. It then sets out a theorised account of what culture is. It turns to the changed political context within which this consultation takes place. It reads the consultation paper and its Five Pillars against the analysis. It anticipates and answers the principal objection to the central recommendation. It concludes with six recommendations and a select bibliography.

Matthew Arnold was wrong: the inherited conception and its continuing distortions

The place to begin is with a specific inheritance the submission contests. When it comes to culture, Matthew Arnold was wrong – and the particular way he was wrong has shaped Australian cultural policy for decades without being named.

The Victorian poet and critic Matthew Arnold, writing in *Culture and Anarchy* (1869), defined culture as “the disinterested endeavour after man’s perfection” pursued through acquaintance with “the best that has been said and thought in the world.” This is the conception that underwrites almost every use of the word *culture* in the consultation paper. Culture is something we have or do or watch or participate in; it is something that can be funded, protected, preserved and exported; it is embodied in “works of art, music, stories, dance, games, film and design”; it contributes \$67.4 billion to GDP and employs 591,000 people. Culture is defined and understood entirely in terms of an elite canon of artistic and literary achievement that society seeks to make available to more people and that a diverse society seeks to broaden.

Arnold’s conception of culture functions as a portmanteau. Culture is simultaneously the body of the finest artistic and intellectual achievement – the canon – the individual’s progressive encounter with and mastery of that canon, and the mark of refinement that the encounter produces. Each element reinforces the others. The institutional consequences follow naturally: museums, galleries, concert halls and public arts programmes are the machinery through which the encounter is organised and the refined outcome certified. It is a conception that can generate funding priorities, attendance targets and workforce numbers without ever asking whether this is what culture actually is or does.

The difficulty with this inherited conception has been identified, with progressively greater force, by a lineage of twentieth-century writers across several disciplines. The Welsh cultural theorist Raymond Williams, in *Culture and Society* (1958) and decisively in the short paper “Culture is Ordinary” of the same year, argued that the inherited conception excluded from the word *culture* almost everything that actually constitutes the culture of a society: the ordinary practices, relationships, languages, work and ways of understanding within which people live. Culture, for Williams, is not a canon that a society accumulates but the common ground that it continuously makes. The Polish–American sociologist Florian Znaniecki, in *Cultural Reality* (1919) and later in *Cultural Sciences* (1952), had already argued that all social reality bears a “humanistic coefficient”: there is no social fact that stands outside the cultural frame within which it is understood. The American cultural anthropologist Marshall Sahlins, in *Culture and Practical Reason* (1976), put the point more polemically: culture is a cause, not an effect. The American interpretive anthropologist Clifford Geertz, in *The Interpretation of Cultures* (1973), gave this its most influential formulation: culture is the webs of significance within which social actors make and are made. And the Samoan writer and intellectual Albert Wendt, in his 1976 essay “Towards a New Oceania,” insisted that Pacific cultures are vital and continuously remade contemporary creative forces, not static traditional inheritances awaiting curation – a point of particular weight for the present submission, to which I return below.

Within the Aboriginal intellectual tradition the same point has been made in different terms. The Torres Strait Islander scholar Martin Nakata, whose concept of the *cultural interface*

(2007) names the space where distinct knowledge systems meet, draws attention to the practical knowledge – not the art, not the ceremony, not the heritage, but the *knowledge* – that Aboriginal peoples carry about Country, kin and the making of social life. The Noonuccal and Bidjara scholar Karen Martin’s account of *relatedness* (Martin and Mirraboopa, 2003) and the Quandamooka scholar Aileen Moreton-Robinson’s critique in *The White Possessive* (2015) hold the same line: Aboriginal cultures are sovereign knowledge systems with standing in their own right, not reservoirs of heritage for a national cultural inheritance.

What unites these otherwise diverse traditions is a single claim: culture is everywhere, or it is nothing interesting. A conception of culture that is bounded – that can be put in one department and left out of another – replicates the inherited conception by default, whether or not the name Arnold appears anywhere.

It is necessary, however, to say something further about this inherited conception of culture in its specifically Australian setting, because the inheritance is not a generic or neutral conceptual problem. It is a particular kind of cultural work performed by a particular kind of polity. Aileen Moreton-Robinson’s (2015) analysis of the white possessive identifies the operation directly: a settler-colonial polity claiming the authority to define what culture is, to curate it, to support and exhibit and export it, on terms that position the dominant culture as simply the natural and universal frame within which all others are admitted. This conception, deployed in this setting, does not merely fail to engage adequately with non-dominant cultures. It performs the cultural work of refracting them through the dominant frame: First Nations cultures positioned as “oldest continuing heritage” rather than as sovereign contemporary knowledge systems; migrant cultures welcomed as “vibrant contributions” to a national mosaic the polity continues to own; the unmarked dominant culture presenting itself as the neutral container within which others appear.

Worth dwelling on for a moment is the specific operation by which the inherited conception conflates culture with tradition. The phrase “oldest continuing heritage,” applied with generous intent to First Nations cultures throughout the consultation paper and in cognate Australian policy discourse, performs precisely this conflation. The word *continuing* is generally heard in a register of static continuity – the same didgeridoo, the same ceremony, the same painting traditions transmitted intact through 230 years of colonial encounter to the present day. This is not what the cultural lives of contemporary First Nations peoples consist of. Aboriginal and Torres Strait Islander cultures are vital, contemporary, dynamic and continuously remade through the relational and creative work of living people – work that takes contemporary forms (urban Aboriginal arts and music, contemporary fiction and screen production, digital and social-media practice, code-switching across multiple knowledge registers, the negotiated making of life in conditions of ongoing colonisation) as well as traditional forms. The conflation of culture with tradition not only misrepresents First Nations cultural life. It positions Aboriginal authenticity as continuity-with-the-past rather than as the contemporary work of living people, and it polices and circumscribes contemporary Aboriginal cultural production for whether it is “really” cultural enough – whether it sufficiently resembles the static heritage the dominant frame expects. Beyond misrepresenting First Nations cultural life, this operation enforces a particular retrospective gaze. Aboriginal people are implicitly required to look backward toward a pre-colonial cultural ideal as the standard against which contemporary practice is measured. “On Country” comes to mean remote bush Country rather than the urban and peri-urban

Country where most Aboriginal Australians actually live. Cultural authenticity is defined anachronistically – by what culture is imagined to have been before contact – rather than by what First Nations peoples are creating now.

Albert Wendt made this point with particular force in the Pacific context. “Towards a New Oceania” (1976) argued that the conception of Pacific cultures as ancient traditional inheritances was itself a product of colonial framing, and that the cultures of the Pacific were and are vital contemporary forces, continuously remade by Pacific people through their own social, creative and political work. The same is true of Aboriginal and Torres Strait Islander cultures. The category error involved is easy to see when applied to any other cultural context. Consider: no one would seriously claim that a visit to the Roskilde Viking Ship Museum provides a handle on contemporary Danish culture. The museum displays artefacts of an ancestral past from which contemporary Danish life has substantially moved on. The distinction between a culture’s historical artefacts and its living contemporary reality is obvious enough when applied to European cultures. Yet the inherited conception, when applied to First Nations cultures, asks Australians to collapse precisely this distinction – to treat cultural museums and heritage interpretation as the principal sites of cultural encounter with peoples who in fact live among us and produce contemporary cultural life of every kind. The operation is performed in good faith by museum staff, heritage practitioners and policy officers who would be horrified by the suggestion that they were participating in cultural misrecognition. The operation is structural; it does not require bad intent.

The architectural performance of this operation in major imperial museums is worth observing. The British Museum, to take the most prominent instance, presents the visitor with a building whose spatial organisation tracks the inherited conception itself. On entering through the great Greek Revival portico, the visitor finds the classical antiquities – the Parthenon marbles, Assyrian sculpture, Egyptian and Mesopotamian collections – arranged in the principal galleries that establish the implied lineage of the polity that owns the institution: the lineage of “western civilisation” rooted in, and possessive of, the classical Mediterranean. The cultural materials of the peoples Britain colonised – African, Asian, Pacific, Australian and American Indigenous collections – occupy the other wings less central to the architectural argument the building makes. The museum studies literature has extensively documented and critiqued the imperial character of the British Museum and similar institutions; less remarked, but present to any visitor who walks the building, is the specific spatial-architectural way in which the same operation is performed. The viewer is invited to occupy a particular position: that of the inheritor of the classical lineage looking out at the cultures of the colonised. Tony Bennett’s *The Birth of the Museum* (1995) examines this institutional form in detail. What it produces in those who occupy its viewing position is what scholars of colonial representation have aptly described as cultural and anthropological voyeurism: the comfortable scientific or aesthetic gaze upon cultural materials wrenched from their living contexts, with the viewer’s own implication in the conditions of that wrenching kept comfortably out of view. Anachronisation, museification and voyeurism work together; they are the institutional embodiments of the inherited conception.

Martin Nakata’s *cultural interface* framework names this dynamic with theoretical precision: the dominant system’s categories pass without comment as universal while the subordinated system’s categories require justification. Karen Martin’s account of relatedness shows what is lost in the translation when Aboriginal ways of knowing-being-doing are made to fit settler

institutional categories that assume the separability of knower from known and the priority of the individual claimant over the relational web. The Aboriginal scholarly tradition has been making this argument for decades, and it is more demanding than the parallel-arrival reading might suggest. The argument is not that Aboriginal cultures are also everywhere in a benign Williams-style sense; the argument is that the dominant Australian conception of culture is itself a particular cultural operation by a particular polity, and that the operation it performs is to position non-dominant cultures as objects rather than as subjects with their own theoretical and political standing.

This sharpens the central recommendation. The current title is not merely intellectually inaccurate. It performs the cultural work of a settler-colonial polity claiming the authority to determine what culture means in Australia, with the operational consequence that non-dominant cultures – First Nations and migrant alike – are admitted only on terms the dominant frame supplies. To rename the policy as an arts policy, and to locate the broader cultural questions properly across the whole of government, is therefore not just a clarification of scope. It is a small structural act of cultural humility – the polity acknowledging that the cultural questions of Australian life cannot be settled by the polity unilaterally, and must be approached through processes that have standing for the plural communities whose cultural lives are at stake.

A theorised account of culture

What this inherited conception gets wrong is culture itself. Having established what the inheritance is and what it does in the specifically Australian setting, the submission can now set out what culture actually is – not as a corrective gesture but as a substantive theoretical position that grounds the analysis to follow.

The conception that follows draws together the culturalist scholarly tradition above with the Indigenous intellectual tradition that has independently arrived at parallel positions. It is not a matter of personal preference but a substantive theoretical position with a century of scholarship behind it across sociology (Znaniecki), anthropology (Sahlins, Geertz), cultural studies (Williams, Wendt) and Aboriginal research methodologies (Nakata, Martin, Moreton-Robinson). It makes five connected claims, each stated here in compressed form because each is developed at greater length in my thesis; the submission asks the reader to consider them as a coherent position rather than as freestanding propositions.

First, **culture is constitutive, not incidental**. It is not a dimension of social life alongside the economic, the political and the technical; it is the medium within which those other dimensions become intelligible at all. Policy analysis that treats culture as something to be “taken into account” alongside other considerations has already misdescribed its position: culture precedes and shapes what counts as a consideration in the first place. This is Znaniecki’s humanistic coefficient given practical expression.

Second, **culture is processual and dynamic**. It is not inherited as a fixed canon or transmitted intact from a prior generation; it is continuously remade through the interactions, negotiations and ordinary practices of people living together. Cultures have continuities, sometimes deep ones, but the continuities are active achievements, not static inheritances. This rules out of consideration any account of culture that treats it as a thing to be preserved

rather than a process to be sustained, and rules out any account of First Nations cultures as ancient survivals rather than contemporary knowledge systems.

Third, **culture is ordinary**. Williams's insistence on this point was polemical in 1958 and remains so now. The cultural life of a society is located in its work and its domestic life, its languages and its ways of being with one another, not principally in its canon of elite artistic achievement. The cultural life of Aboriginal Australia is carried in kinship, in Country, in law, in language and in the everyday making of community, not principally in its artistic output however accomplished. A policy that equates "culture" with "the arts" collapses this distinction and loses most of what is interesting about either.

Fourth, **culture is the medium in which institutions operate**, including the institutions of the state. This is the claim a sceptical reader is least likely to accept on first encounter, and it is also the claim on which most of the submission's practical recommendations rest, so it is worth dwelling on. The institutions of the state, across all portfolios and at all levels of government, are not culturally neutral instruments that engage with culture episodically through portfolios designated as cultural. They are themselves cultural formations, carrying particular assumptions about knowledge (what counts and what does not), authority (whose voice is admitted and whose is heard), time (the linear rather than the cyclical or the recursive), evidence (the documentary, the quantifiable, the auditable) and personhood (the autonomous individual rather than the relational subject). These assumptions are reproduced in every document the institutions generate, including this consultation paper. The phenomenon is not malicious or unusual. It is what institutions do. But once one sees it, the proposition that one portfolio of government is the "cultural" one becomes harder to defend. Karen Martin's work on Aboriginal ways of knowing-being-doing makes this point with particular force: it is not that Aboriginal culture is "different" and must be accommodated; it is that the institutional forms through which Aboriginal life is currently administered carry their own ontological assumptions – about the separability of knowing from being, about the priority of the individual claimant over the relational web – which are themselves cultural and which currently pass without acknowledgement. Aileen Moreton-Robinson's critique of the white possessive identifies the operation as a particular kind of cultural work: the state's confident curation of "Australian culture" as an object it can own, support, fund and export, in the very grammatical and administrative moves the consultation paper performs. Policymaking, on this account, is not a neutral technical practice that engages with cultural content; it is a cultural practice whose products are cultural artefacts.

Fifth, and crucially for the nomenclature question, **culture must be distinguished from its embodiments in time and space**. Culture is the generative medium; its embodiments are the particular forms it takes in particular circumstances. The arts are one such embodiment – a rich and important one, but one. Kinship is another. Language is another. Law, ceremony, workplace practice, public administration, the forms of commerce, the conventions of civic life: these are all embodiments of culture without being coextensive with it. The inherited conception's central error, repeated throughout the consultation paper, is to confuse one embodiment (the arts) with the thing itself (culture), and thereby to exclude from policy view the vast majority of the cultural life through which Australians actually live.

These five claims together constitute what this submission takes culture to be. The fifth does the most direct work on the policy question at hand. Once culture is distinguished from its

embodiments, the recommendation that follows is not a nomenclature preference but an act of conceptual hygiene: call the policy what it is – a policy for one embodiment of culture, namely the arts – and leave the concept of culture free to do the broader work it is needed for elsewhere in the operations of government.

Plurality, identity, and the changed political context

The practical stakes of the distinction between culture and its embodiments become most visible when the submission turns to the specific political context within which the next National Cultural Policy will operate. That context is considerably more troubled than the consultation paper acknowledges.

The consultation paper engages only glancingly with the question of collective values and identity in a multicultural society. The word “diversity” appears repeatedly, but in the paper’s usage it is consistently demographic: the population to whom cultural support should be made accessible, rather than the substantive question of what plural Australian values and identities are, how they relate to one another, and what cultural policy’s role in mediating their coexistence might be. This silence is theoretically symptomatic. The inherited conception of culture has no resources for genuine plurality, because its operation is to canonise one cultural inheritance and admit others only on the canon’s terms. A policy operating on this conception can offer *the same arts-sector support to a wider range of practitioners* – which is what the consultation paper proposes – but it cannot engage with the substantive question of what an Australia constituted by genuinely plural value commitments looks like, because that question is unaskable within the framework’s own terms.

This is not merely an abstract concern. In recent years, a reinvigorated and often bellicose Australianism has become increasingly prominent in public life – populist in character, white in its cultural dimensions, and assertive of a particular exclusive vision of national identity. This is not a marginal phenomenon. It has found expression in mainstream political discourse, in the organisation of identitarian movements, and in a cultural politics of resistance to recognition, reconciliation and multiculturalism that has hardened noticeably in the period since the 2023 Voice referendum. The inherited conception of culture has nothing to say about this development, because the cultural questions it raises are precisely those that an arts-portfolio document cannot address. They belong in the domain that the submission argues should be properly recognised as the business of the whole of government.

Noel Pearson, most fully in his 2022 Boyer Lectures, has proposed a framework in which contemporary Australia is understood as the product of the intertwining of three national narratives – Indigenous, British and multicultural. The model has the surface appearance of inclusive recognition: each “narrative” is acknowledged, and the contemporary Australian polity is presented as their woven product. In practice the model performs a particular and damaging operation. It places the British strand as one strand among three, when in operational terms the British strand is not a narrative comparable in kind to the others but the operating system of the Australian state – its legal forms, its institutions of government, its language of administration, its assumptions about property and personhood. In practice, three-narratives framing shields this operating system from critique by rendering it as just one cultural inheritance among the others. It simultaneously domesticates the Indigenous and

migrant strands by positioning them as “narratives” the polity acknowledges, rather than as standing claims on the polity that the polity has not yet adequately answered. The framework, in the form in which it has currency, is most often deployed by non-Indigenous policy and political figures, frequently invoking Indigenous endorsement to lend it legitimacy. A serious cultural-policy framework needs to do better than this. The Aboriginal intellectual tradition the submission draws on does not propose three intertwined narratives; it proposes that Aboriginal cultures are sovereign knowledge systems with standing in their own right, that the settler-colonial polity has yet to develop adequate cultural and political resources for engagement with them, and that the migrant cultures of Australia present a similarly substantive standing claim. These are not narratives to be intertwined. They are distinct cultural and political realities whose coexistence requires substantive negotiation rather than narrative synthesis.

The silence in the consultation paper has political consequences. The next National Cultural Policy operates in a substantially different political and social context from Revive’s. The 2023 referendum on a constitutional Voice was a question on which Australians of good faith and good standing held a range of positions, and nothing in this submission turns on which position any particular reader took. The phenomenon worth registering is a separate one: in the period leading up to and following the referendum, an active and virulent exclusionary nationalism has consolidated in Australian public life. The licensing of overt racial rhetoric in mainstream political discourse, the harassment of Aboriginal public figures, and the organisational consolidation of identitarian movements together establish that the cultural settlement of multicultural and reconciling Australia is not as stable as it was once assumed to be. A consultation that proceeds without acknowledging this context proceeds in a vacuum the context will fill anyway.

The relevant theoretical observation is more demanding than it may first appear. The inherited configuration does not merely fail to engage with this changed context. It *produces* the conditions in which exclusionary nationalism finds its constituency. The configuration performs three quiet pieces of cultural work that, taken together, prepare the ground. The first is canonisation: it centres a particular tradition as the implicit reference point against which other cultural production is measured, supported and “included.” The second is possessive curation: it positions the polity as the proprietor of “Australian culture,” with the authority to determine which cultural expressions are admitted, exhibited and exported. The third is the depoliticisation of cultural questions through their administrative containment: by placing cultural matters within a portfolio framework that operates on arts-and-creative-sector logic, it removes them from the domains where the substantive political-cultural questions of belonging, identity and historical reckoning would have to be addressed – and so leaves those questions to be answered by whoever does take them up. Taken together, these three operations fundamentally misrepresent culture. They denude it of the very qualities that make culture matter: its generative and meaning-making power, its capacity for transformation, and its role as the medium through which a society comes to understand itself and its possibilities.

None of these moves is itself nationalist. Each, however, leaves a particular kind of vacancy in Australian public culture: a vacancy where a substantive language for plural belonging, mutual obligation, contested historical reckoning and cultural interdependence ought to be. The vacancy is what the inherited configuration cannot fill by its own logic, because its logic is to identify, support and curate the cultural canon rather than to do the cultural work of building

shared resources for plurality. Exclusionary nationalist movements, when they form, find the vacancy already prepared. Their claims about the primacy of “Australian” identity, about the limits of multiculturalism, about the threat posed by recognition of Aboriginal sovereignty, are claims the broader public culture has not been equipped to answer because the cultural-policy framework that was nominally responsible for those resources was operating with a conception of culture that could not develop them.

The contempt often expressed by exclusionary nationalist commentariat for what is variously caricatured as “the cultural sector” – “the cultural elite,” “the inner-city establishment,” “elite cultural gatekeepers” – is theoretically interesting in this connection rather than merely insulting. The caricature correctly tracks that the arts and creative sector is not the exclusionary movement’s ally; most of the sector’s inhabitants are reflexively horrified by exclusionary nationalism and would oppose it actively. But the caricature also tracks that the arts and creative sector is not the exclusionary movement’s operationally meaningful adversary, because the inherited cultural configuration that organises the sector’s policy frame produces the very vacancy the nationalists are colonising. The two parties end up with a kind of mutual non-engagement: the arts and creative sector continues its work in good conscience, the nationalists continue developing their own cultural politics in the vacancy the framework leaves, and the broader public is left to choose between an arts policy that does not address its lived cultural questions and a nationalist movement that loudly does. This is not a stable arrangement and it does not favour the arts and creative sector.

This argument indicts neither the arts and creative sector nor its inhabitants. The artists, sector executives, panel members and policy officers operating within the current configuration are doing what the configuration asks of them, and many are doing so with skill and commitment. The argument is structural: the configuration itself is the failing element, and a renamed arts policy paired with a properly-located cross-portfolio cultural commitment is the architectural condition for the cultural work the changed political context requires. The renaming is not a retreat. It is the precondition for a culturally serious response to the situation Australia now finds itself in. This is the convergence point: the diagnosis offered in this section terminates in the same central recommendation the rest of the submission has been advancing on independent grounds.

The conceptual problem in the consultation paper

With the theoretical and contextual ground established, the submission now turns to the consultation paper itself and to the specific ways in which the inherited conception operates within it.

Read against this tradition, the consultation paper becomes a different document. The paper slides, in a way that is both common and telling, between “arts and culture” – where *arts* is doing most of the conceptual work and *culture* is honorific – and “culture” on its own, where the inherited conception is doing the work. The Minister’s message says arts and culture are “essential to our economy, our wellbeing, and our sense of belonging.” Wellbeing and belonging are cultural in the Williams sense, but the evidence marshalled on the following page is all arts-sector evidence: GDP contribution, workforce numbers, creative exports. The Five Pillars themselves are mostly arts-and-creative-sector pillars: artists as workers,

institutions as infrastructure, audiences as recipients. Only Pillar 1 and parts of Pillar 2 gesture toward culture in the broader sense, and even there the gesture is made through the registers that a serious cultural theory exists to criticise.

This is precisely what Nakata's cultural interface concept describes: the space where distinct knowledge systems meet, in which the dominant system's categories pass without comment as universal while the subordinated system's categories require justification. The consultation paper's movement between "arts and culture" and "culture" simpliciter is a small instance of the same phenomenon. The paper does not need to argue that culture means what it appears to mean; the meaning is supplied by an unspoken cultural inheritance the paper assumes its readers share. A reader operating from a different position – from within an Aboriginal intellectual tradition, or from one working with a different understanding of culture – encounters the paper and registers the conflation immediately. The paper is not addressing them; it is addressing a reader who already knows what "culture" means in the appropriate Australian governmental sense.

The paper's most revealing sentence is on page 5: "Arts and culture shape how we see ourselves and how the world sees us." Strictly, this is a claim about culture in the Williams sense – about the meaning-making through which a society knows itself. But in the paper's own treatment, "how we see ourselves" is evidenced by works of art, music, stories, dance, games, film and design. It is reduced to the arts. The conflation is not malicious; it is the inherited conception operating as a default.

It should be noted that the conceptual difficulty is not new with this consultation paper. The 2023 Revive policy framed its principal pillar as "A Place for Every Story," inheriting the same conflation: *story* as an arts-sector term standing in for the broader cultural claim that "every" would otherwise warrant. The current consultation paper retains the formulation and inherits the difficulty. This is not to suggest Revive was a poor policy – by the consultation paper's own account, 75 of 85 actions have been delivered, which is a creditable record – but to observe that the conceptual difficulty has been carried forward unexamined into the present round, and that the new policy has the opportunity, which Revive did not, to address it.

There is a further structural feature of the consultation paper worth naming, because it is itself a symptom of the inherited conception and bears directly on what the policy can and cannot do. The consultation paper operates as a portfolio document for the Office for the Arts. Significant Australian cultural institutions sit outside this portfolio: the Australian Institute of Aboriginal and Torres Strait Islander Studies (AIATSIS) is in the Indigenous Affairs portfolio; the National Archives of Australia is in the Attorney-General's portfolio; substantial cultural and language work is done across Education, Foreign Affairs and Trade, Veterans' Affairs and the National Cultural Heritage Account. The consultation paper does not engage with these institutions, and the policy it proposes will not coordinate them. Nor does the paper address the relationship between Commonwealth cultural policy and the substantial cultural infrastructure of the States and Territories – the state galleries, libraries, archives, performing arts organisations and festivals that constitute much of Australia's cultural life. The framework, in other words, is not a *national* cultural policy in any but a portfolio sense. It is a policy for one Commonwealth portfolio's view of culture, mistaking itself – through the very conflation this submission diagnoses – for a national one. The word "national" in the policy's title is doing the same work that "cultural" is doing: claiming a scope the document does not occupy.

The silo structure is not a contingent administrative arrangement. It is an artefact of the inherited conception. A bounded culture can be administered by one portfolio; an unbounded one cannot. The current configuration produces a chilling effect on cultural-policy ambition: any matter that crosses portfolio boundaries – and most of the genuinely cultural matters do – falls between the silos and is unlikely to be advanced through any single portfolio's policy. This is not a problem the next National Cultural Policy can solve through machinery-of-government changes, nor should it try. The Ngurra Project, as developed and progressively implemented, demonstrates that cross-portfolio cultural work is possible when there is a substantive Commonwealth institution carrying the convening responsibility. AIATSIS sits in the Indigenous Affairs portfolio, where its leadership and Council are well-placed to determine its own institutional direction; the cross-portfolio character of the work proceeds through coordinative arrangements rather than through reorganisation. The submission does not propose machinery changes. It proposes that the next National Cultural Policy recognise the cross-portfolio character of cultural work, and develop the conventions and arrangements through which it can be done well – in conversation with, not in administrative absorption of, the cultural institutions that already exist across the Commonwealth.

Four registers of cultural mishandling

The general pattern of conflation identified in the previous section takes four specific operational forms. Each is worth naming precisely, because naming them is the first step toward not reproducing them.

I argue, in work developed more fully in my thesis, that the Australian public sector characteristically mishandles culture by collapsing it into bureaucratically manageable forms through four registers. They are **anachronising** (culture as past heritage), **liturgicalising** (culture as public ceremonial performance), **materialising** (culture as artefacts and measurable output), and **commodifying** (culture as marketable product). The registers are not mutually exclusive; the same passage of policy text can perform several of them at once. They are also not coincidental rhetorical choices. They are what the inherited conception of culture looks like in operation. A conception of culture as elite canon tends naturally toward past heritage, public ceremony, measurable artefact and marketable product, because these are the only forms in which such a conception can make culture legible to itself. The four registers, taken together, describe how a bureaucracy that has inherited this conception goes about its daily business. They also represent what Michael Pusey, in his landmark study of the Australian public service, identified as the pervasive economism of Canberra policy thinking: the crowbarring of sometimes powerfully ineffable social and cultural dynamics into the rationalising frameworks of economic management – a process that systematically reduces what cannot be measured to what can, and what cannot be priced to what has no value.

The consultation paper performs all four. Worth dwelling on at greater length is the materialising register, because it does the most authoritative work in the paper and is the register a sceptical reader is most likely to defend on its merits. The *Why culture matters: Delivering for Australia* page (p. 5) opens with “culture drives prosperity and innovation” and adduces, as evidence, that “cultural and creative activity contributed \$67.4 billion to Australia’s economy and employed over 591,000 people” in 2023–24. Beyond that direct economic contribution, the paper notes, culture “fosters creativity, design thinking and problem-solving

capabilities” and is “increasingly recognised as important for innovation and productivity in the workforce.”

Each of these claims is true. Each is also doing something other than what it appears to be doing. The \$67.4 billion figure does not measure the contribution of culture to Australian life; it measures the contribution of *cultural and creative activity* – a category constructed by the ABS in collaboration with the cultural agencies to make the sector legible in GDP terms – to the national accounts. This is not merely a statistical exercise. The construction of that category is itself a critical element of the inherited conception’s colonial operation: it determines what counts as cultural work for policy purposes, and that determination systematically excludes Aboriginal and other non-dominant cultural practices that do not take market-transacted, employment-generating or measurable output forms. The two are not the same. Most of what culture does, in the sense these traditions articulate, is not capturable as a contribution to GDP because it is not transacted in markets, not measured in workforce hours and not produced as an output. The languages an Aboriginal child grows up hearing, the kinship systems that organise relations of care, the shared expectations that allow strangers to sit together on a bus or in a courtroom, the assumptions about time and obligation that make a workplace function: these are the principal cultural facts of any society, and the \$67.4 billion figure does not register them at all. To present an artefact-and-workforce metric as the case for *culture* is to materialise: to mistake an embodiment for what is embodied. The reader is invited to find culture important because it is large in the national accounts, when the case for culture’s importance turns on something that, by the metric’s own logic, the metric cannot see.

This matters more than it may initially appear, because the materialising register has political consequences. A policy whose principal evidential frame is GDP and workforce contribution is implicitly making the case for cultural support on terms that other portfolios with larger numbers can always trump. Health is bigger. Defence is bigger. Education is bigger. Mining is bigger. The materialising register, presented as advocacy for culture, in fact delivers culture into a comparison it can never win, and obscures the case for culture that does not depend on size at all – the case that a society without a public cultural life of any kind would not be a society in any sense the term ordinarily carries. The non-materialising case is harder to make and ultimately more durable. The submission is making it now.

The other three registers operate similarly though more briefly. “First Nations cultures are Australia’s oldest continuing heritage” (p. 5) anachronises: First Nations cultures appear in the policy through the temporal frame of *heritage* rather than as living, contemporary, contesting and adapting knowledge systems with claims on how the Commonwealth itself operates. The frame is generous in intent and damaging in operation: it places First Nations cultural life at a temporal distance from the present in which policy is made, which is precisely the move that allows policy to be made about First Nations cultural life rather than from within an engagement with it or indeed by First Nations people as an act of self-determination. The paper’s repeated invocations of “stories” and of “celebration” risk the liturgicalising move, in which cultural engagement is discharged through public ritual – the festival, the launch, the Welcome to Country at the opening of the meeting – while the substance of how the policy operates remains untouched. This is familiar enough in the Aboriginal policy domain that it has its own sceptical idiom; what is worth observing here is that it operates in cultural policy too, and for the same reason. The framing of “creative exports” that “contribute to diplomacy and

how Australia is seen and understood globally” commodifies: culture as a national-brand asset, leveraged for soft power. Aileen Moreton-Robinson’s critique of the white possessive is helpful here. The state, in this register, does not engage with cultures so much as purports to own a culture that it then deploys: “Australia” as the proprietor and “our creativity” as the inventory. The grammar is not incidental.

Two observations follow from the four-register analysis. The first is that the registers are connected. They are not four separate failings of a generally sound conception; they are four faces of the same conceptual error, which is the failure to distinguish culture from its embodiments. Once that distinction is held, the registers can be seen for what they are: ways of treating an embodiment of culture as though it were the culture itself. The second is that the registers are not avoidable through more careful drafting. They are not editorial slips. They are how an inherited conception of culture, when handed to a competent though time-poor, conceptually ill-equipped bureaucracy, comes out the other end. The remedy is not better wording. The remedy is a different conception.

Implications for the Five Pillars

The analysis developed across the preceding sections can now be applied to the specific pillar structure the consultation paper proposes. The analysis is not designed to dismantle the pillars. It is designed to show what each pillar could do more clearly and effectively if the conceptual work were done. The Five Pillars retain value when understood as what they largely are: an arts-and-creative-sector framework. Read that way, most of what the sector will offer in its specialist submissions is sensible and the submission defers to those submissions for detail. What follows are pillar-specific observations that follow from the argument above.

Pillar 1 – First Nations First

The government’s intent in this pillar is to signal that First Nations arts and creative industries have an indispensable place in Australia’s arts and creative life, and this submission agrees with that intent. Nothing in the argument above should be read as contesting it. The point is rather that, once the policy is correctly named as an arts and creative-sector policy, the pillar does cleaner work than its current framing allows. It can focus precisely on what it is trying to do: affirm the centrality of First Nations artists, storytellers, musicians, designers, screen and games practitioners to Australian arts and creative life, and support the structural conditions – above all, the conditions for Aboriginal agency in cultural making and remaking – under which that centrality is sustained. The pillar’s most consequential work is to resource and facilitate First Nations people to make decisions about their own cultural and creative lives, with the resources and the institutional architecture to act on those decisions. What it is not – and should not be asked to be – is a stand-in for the Commonwealth’s broader recognition of First Nations cultural sovereignty, which is a whole-of-government matter properly located outside any arts-and-creative policy. Distinguishing the two makes both stronger: Pillar 1 becomes an unambiguous statement of the place of First Nations creative practice within the arts, with Indigenous agency at its centre, and the broader cross-cutting commitment to First Nations cultural sovereignty can be named and located where it properly belongs.

Pillar 2 – A Place for Every Story

This is where the conceptual confusion is most visible. “Story” is an arts-sector term; “every” gestures toward the broader cultural claim. The pillar cannot consistently do both. Either it commits to supporting a pluralist arts sector in which more diverse creative practitioners can participate – honourable, tractable, and what the pillar actually addresses in practice – or it commits to recognising the making of meaning by communities across the country as the foundation of national life, which is genuinely cultural in the Williams sense and considerably larger than an arts policy can carry. My recommendation, consistent with the submission’s central argument, is that the pillar be re-scoped explicitly to the first: support for a more pluralist arts and creative sector, with “stories” understood as one artistic form among many rather than as a stand-in for cultural life as such.

Pillar 3 – Centrality of the Artist

The pillar is well-formulated as an arts-policy concern and the work being done under it through Creative Workplaces, Music Australia and the developing Writing Australia is substantial. The theoretical framework of this submission has one observation to add. The pillar formulates the artist as *worker* – “arts workers as real workers,” in the Minister’s message – and frames the policy task as ensuring fair pay, safe and inclusive workplaces and protected creative rights. These are necessary commitments and the submission supports them without qualification. What is worth noticing is that the framing itself locates the artist within a productivity-and-labour paradigm that is not, in the Williams sense, a culturalist framing. It is a framing the labour movement has bequeathed to the arts sector – generously and with substantive benefit – but whose underlying conception of work assumes the very arts-as-output model the rest of the submission has been at pains to put under pressure. This is not an objection. It is a noticing. A culturalist framing of the artist would treat artistic work as one form of meaning-making activity within a broader cultural life, with continuities to other forms of meaning-making (teaching, parenting, governing, judging, administering) that are not currently described as artistic and are not currently included in this pillar. The pillar as it stands is honourable on its own terms; the broader question of who gets to count as a maker of meaning in Australian society is a question the present consultation paper cannot ask within its own pillar architecture, and would benefit from being able to.

Pillar 4 – Strong Cultural Infrastructure

The pillar concerns “the institutions which sustain our arts, culture and heritage” and proposes that infrastructure should be “resilient, adaptable and fit-for-purpose.” As an arts-sector pillar this is straightforward. As a *cultural* pillar it requires more attention. The word *infrastructure* already encodes a particular conception of culture: culture as the kind of thing that requires buildings, collections, schedules of programming, staffing structures and capital works – culture as the activity of cultural institutions. Tony Bennett’s *The Birth of the Museum* (1995) argued some decades ago that the cultural institution is not a neutral container in which culture happens but a particular nineteenth-century technology for producing the very conception the inherited tradition trades on. Culture as canon, culture as heritage, culture as collection, culture as elevated public encounter – these are institutional achievements before they are ideas. To frame cultural policy primarily through institutional infrastructure is therefore to perform the

materialising register at the level of policy architecture: to assume that culture lives in buildings.

There is a different and more useful sense of cultural infrastructure that the policy could engage with: the *cognitive* and *administrative* infrastructure through which cultural activity is rendered visible and supportable in the first place. This includes the funding categories of the Commonwealth's cultural agencies, the eligibility criteria of the various offsets and tax measures, the evaluation methodologies through which programs are assessed, the consultation formats through which voice is admitted (including the form of this very submission), the ABS cultural and creative activity statistics, the templates that grant applications must inhabit and the auditing arrangements through which compliance is enforced. These are themselves cultural artefacts, encoding particular assumptions about what counts as cultural work and what does not. Modest investment in interrogating and revising them – specifically by including First Nations and other non-dominant epistemologies as standing partners in the design of policy instruments rather than as the populations the instruments are then applied to, and as agents in setting the terms by which cultural activity is recognised – would produce a multiplier effect across every other expenditure in the policy. This is the practical content of Recommendation 6 below.

There is also the matter of First Nations cultural materials held in settler collecting institutions, which the current consultation paper does not address and which a culturalist framework cannot leave alone. Much of what is held in Australian museums and galleries from First Nations communities is not *art* in the canonical arts sense and is not *heritage* in the settler sense; it is ceremonial material, Ancestors, secret-sacred objects and law items, much of it acquired without consent. Their proper governance is a sovereignty question before it is an arts question or an infrastructure question, and the question is properly answered by First Nations people exercising agency over their own cultural materials. An honestly-titled arts policy can retain Pillar 4 as a pillar of arts and creative infrastructure without disturbance; the broader cultural-sovereignty question concerning First Nations holdings should be located alongside the cross-cutting commitment proposed in Recommendation 3, where it can be governed by the cultural authority of Traditional Owners rather than by the institutional logic of the collecting institution.

Pillar 5 – Engaging the Audience

“Audience” is another product of the same inherited conception: the public as receivers of cultural production by trained practitioners. Programmes designed to bring metropolitan cultural experiences to regional and rural communities, however well-intentioned and however valued by the communities that receive them, rest on the faulty assumption that those communities would otherwise be culture-free zones. The assumption is not stated; it is encoded in the programme logic before any decision is made about what to bring or where to take it. A framing that took culture in the Williams sense would speak of *participation* rather than audience, and would measure success by the proportion of the population actively engaged in making meaning, not the proportion attending institutions. The recommendation is straightforward: rename the pillar “Sustaining Cultural Participation” and redefine its success measures accordingly. The nominal change is small; the implications for how programmes are scoped and evaluated are substantial.

An anticipated objection

The pillar-by-pillar analysis reinforces the central recommendation from several directions simultaneously. Before turning to the recommendations themselves, the submission addresses the strongest objection to that recommendation – one that deserves a direct answer rather than a footnote.

The principal objection to the central recommendation – that renaming the policy as an arts and creative industries policy would diminish the political standing of the cultural commitment and cost the sector ground – deserves to be engaged directly. The objection is reasonable. It rests on a long-running and substantively defensible Australian sectoral strategy in which the word *culture* has been deployed precisely to resist the marginalisation that *the arts* alone might invite. Successive sector advocates have used the broader term to claim ground for the work of artists in domains – wellbeing, social cohesion, identity, diplomacy – that *the arts* might struggle to claim on its own. From within that tradition, the proposal to rename the policy looks like a unilateral disarmament.

The objection rests, however, on the assumption that the broader cultural commitment can only be carried by the title of the arts policy, and that surrendering the title is therefore surrendering the broader commitment. The reverse is closer to the truth. The current arrangement – in which the broader concept of culture is carried by the title of an arts policy – keeps the broader commitment *inside* the arts portfolio, where it remains an arts-portfolio responsibility, evaluated against arts-portfolio metrics, debated by an arts-portfolio audience and protected only as long as the arts portfolio retains political support. This is a fragile arrangement. It also forecloses the very work the broader cultural commitment most needs done: work in the rest of the Commonwealth, on the cultural assumptions of every other portfolio. An honestly-named arts policy, paired with a properly-located cross-portfolio commitment to the cultural questions of Australian governance, would make both stronger. The arts policy becomes more focused, better resourced for the work it can actually do, and easier to defend on its own terms. The broader cultural commitment becomes visible as everyone's responsibility rather than the Office for the Arts'. The political risk of the renaming is, on this view, smaller than the political risk of the current arrangement, in which the inherited conception is doing the work and a culturally serious policy is what is being foregone.

There is a further dimension worth registering. Aboriginal cultural matters have for some time been handled through whichever portfolio happens to have currency in a given year – sometimes Health, sometimes Education, sometimes the Prime Minister's portfolio, sometimes the Office for the Arts. This dispersal has had real costs for First Nations peoples: each new placement requires a fresh round of capability-building in the host portfolio, a fresh negotiation of authority and a fresh accommodation to the host's existing instruments – with First Nations people repeatedly required to translate their cultural authority into the host's administrative categories rather than to exercise it on their own terms. A policy framework that names cultural questions at large as cross-cutting Commonwealth concerns, separately from the arts policy that does its arts-policy work, would offer a structural correction to this dispersal that has so far eluded successive attempts to address it from within sectoral arrangements. This is not the most important argument for the recommendation. It is, however, an argument the consultation has standing to consider.

Recommendations

The submission having made its case and answered the principal objection to it, the recommendations that follow are six in number. They are not items of equivalent weight. The first is the central recommendation of the submission and the structural conclusion the analysis converges on. The second is the fallback if the first is not accepted. The third through sixth are subsidiary recommendations, each holding independent value but each strengthened by the adoption of the first.

1. That the policy be renamed. The submission's central recommendation is that the document being produced be titled to reflect what it actually is – a policy for the Australian arts and creative industries – rather than the broader category of *culture* within which the arts are one embodiment among many. Candidate titles include *Australian Arts and Creative Industries Policy*, *National Arts Policy*, or similar. The renaming is not cosmetic. It is the act through which the policy claims a coherent scope, distinguishes its work from the broader cultural responsibilities of the Commonwealth, releases the concept of culture for the work it is needed for elsewhere, and signals a serious engagement with the theoretical question of what culture is. The other recommendations below follow from this one and are weakened by being adopted without it.

2. That, if the “cultural policy” title is retained against this recommendation, the policy acknowledge explicitly in its preamble that it operates within the inherited Victorian tradition of culture-as-canon, and that the broader cultural dimensions of Australian life are properly the business of every portfolio. This is the less ambitious but administratively simpler option; it at least makes the policy's own conceptual position visible.

3. That First Nations cultural sovereignty be recognised as a cross-cutting commitment of the Commonwealth, complementing rather than replacing Pillar 1's focus on First Nations arts and creative industries. The Commonwealth's broader engagement with First Nations knowledge systems – across health, education, environment, justice, economic development and the internal operations of government itself – is work that cannot be carried by an arts-and-creative policy alone, and that work should be named and located accordingly. The substantive content of the commitment is the resourcing and facilitation of Aboriginal agency: First Nations people making decisions about their own cultural and political lives, with the resources and institutional architecture to act on those decisions. The recommendation does not propose machinery-of-government changes. The cultural institutions that already exist across the Commonwealth, including AIATSIS in the Indigenous Affairs portfolio, are well-placed to continue their work where they are; what is needed is the coordinative architecture through which cross-portfolio cultural matters can be convened, governed and resourced without requiring reorganisation. The Ngurra Project offers one demonstrated model for how such cross-portfolio cultural work can be done; other models will be appropriate for other matters.

4. That the Commonwealth make an explicit and significant commitment to investment in First Nations arts, creative industries and heritage as a substantive discharge of its obligations under Priority Reform 2 – Building the Community-Controlled Sector – of the National Agreement on Closing the Gap. Priority Reform 2 has been progressively implemented in health through Aboriginal Community Controlled Health Organisations, in

early childhood through Aboriginal Community Controlled Organisations, and in legal services through Aboriginal and Torres Strait Islander Legal Services. It has had no analogous response in the First Nations arts, creative industries and heritage space. This is the gap this recommendation addresses. The investment commitment should be to a *networked on-Country* heritage infrastructure – not a single national institution and not autonomous independent centres proliferating without coordination, but a networked model that responds to local specificity while drawing on economies of scale and operating sectorally: sharing back-office capability, conservation expertise, registrar systems, repatriation processes, training pathways and governance support across centres while leaving cultural authority and programming with the communities each centre serves. The Commonwealth should commission independent expert First Nations advice on the design of that infrastructure before making specific implementation announcements, ensuring that communities rather than Canberra determine what the network looks like in practice. Australia has substantial institutional learning to draw on – including the Queensland Indigenous Knowledge Centre model, the Aboriginal Art Centres sector, regional and remote Keeping Places, and the Ngurra Project’s developing implementation – and the expert process would draw on all of it without being predetermined by any of it.

Two further dimensions warrant explicit note. The first is the resources sector. In the post-Juukan Gorge regulatory and reputational context, resource companies have come under pressure to fund heritage management arrangements at the request of local communities. The pressure is legitimate and the response in principle welcome, but in practice could produce a proliferation of individual keeping places without the funding, workforce or coordinative infrastructure to sustain them – a sub-optimal use of resources the companies are already committing. A networked model would offer the resources sector a viable architecture within which to meet its obligations through investment that builds durable capability rather than dissipating into one-off project costs. The Commonwealth has a productive convening role here, drawing the relevant agencies together with the private sector and First Nations representative bodies. The second is economic development. A networked on-Country heritage infrastructure builds skilled jobs in regional and remote Australia, develops a workforce with transferable arts, heritage and knowledge-management skills, and creates the institutional architecture for a genuinely community-controlled First Nations arts and heritage sector. The proposal sits, perhaps unexpectedly, within the current economic-development policy pivot, and it gives the Commonwealth a concrete and fundable means of discharging its Closing the Gap Priority Reform 2 commitment in a domain where that commitment has so far been honoured largely in the breach.

5. That Pillar 5 be renamed “Sustaining Cultural Participation,” with success measures redefined to include evidence of cultural making, meaning-making and self-understanding at community scale, not only attendance and consumption.

6. That the Commonwealth commission a programme of work, located outside the arts policy, to audit the cultural assumptions encoded in the instruments through which it makes policy. This is the most ambitious of the subsidiary recommendations and the one that follows most directly from the submission’s deepest claim that policymaking is itself a cultural practice. The programme of work would examine, in plain language and without methodological pretension, the cultural assumptions built into a representative sample of

Commonwealth instruments: funding categories and their underlying conceptions of who counts as a beneficiary; evaluation methodologies and their assumptions about what kinds of evidence count; consultation formats and their assumptions about whose voice is admitted and how; the Digital Service Standard's definition of accessibility; the templates that grant applications must inhabit and the auditing arrangements through which compliance is enforced. The programme would not seek to produce a single "culturally appropriate" set of replacements; that is not how a serious cultural theory operates. It would instead make visible to the institutions themselves the cultural work their instruments are doing, and provide a methodological foundation for revising those instruments in dialogue with the populations they are applied to – First Nations peoples in particular, but also other communities whose epistemologies are not currently accommodated by the dominant administrative forms. This is *subversive reappropriation*, in the term my thesis develops: existing bureaucratic forms turned to different cultural work. It is the practical content of a culturally-serious commitment, properly located outside the arts policy at the centre of government.

Conclusion

The submission's argument has moved through a sequence of connected stages, each arriving at the same structural conclusion. It is worth stating that conclusion plainly before drawing the threads together.

Williams's argument in "Culture is Ordinary" was that the inherited conception excluded from view almost the entirety of the cultural life through which people actually live: their work, their relationships, their languages and the ways in which they make meaning together. The submission has argued that the present consultation paper, sincerely intended and capably drafted as it is, inherits this conception by default, performs it through the four registers of anachronising, liturgicalising, materialising and commodifying, and – critically – misnames itself in the process, claiming the territory of "culture" for what is in substance an arts and creative industries policy. The misnaming has practical consequences. It places the broader cultural responsibilities of the Commonwealth inside an arts portfolio that cannot carry them, makes the case for the arts dependent on a materialising metric that other portfolios will always trump, and forecloses the very work a culturally serious country most needs done: the work of recognising that policymaking itself is a cultural practice, that every portfolio operates within and reproduces particular cultural assumptions, and that an honest engagement with this fact is not a threat to any sector but the foundation of more competent and more equitable government across all of them.

There is a deeper move underneath this. The submission has argued, following the culturalist tradition and the Aboriginal intellectual tradition that has independently arrived at parallel positions, that culture must be distinguished from its embodiments. To distinguish culture from its embodiments is itself a cultural act – the act of refusing the conflation the inherited conception trades on. A policy that performs this act in its own naming, even just in its own naming, demonstrates the conceptual hygiene the rest of the policy task requires. A policy that does not perform it inherits the conceptual confusion of its title and operates within it, producing instruments that work on culture in ways that the policy itself cannot see. The choice between these two policies is not a choice between two different titles. It is a choice between two different conceptions of what cultural policy in Australia could be.

This submission has argued for the more demanding choice. Whether the next National Cultural Policy is renamed or not, the conceptual work the renaming would perform must be done somewhere. If the title is retained, the policy itself must do this work in its drafting, its instruments and its evaluation. If the title is changed, the work becomes part of the architecture of government rather than the burden of one document. Either way, the work cannot be deferred indefinitely without continuing to misdescribe what the Commonwealth is doing when it engages with culture in Australia. A consultation that takes its own title seriously will recognise this and respond accordingly.

I thank the Office for the Arts and the Expert Panels for the invitation to contribute, and I am available to elaborate any of the arguments above if that would assist the development of the next policy.

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