

Letters to the Editor

Dear Sir

It is futile for authors to carp about reviews or to try to explain their jokes. I take up remarks made in Terry Eastwood's review of *The Records Continuum* . . . (*Archives and Manuscripts*, vol. 23, no. 1, pp. 107–114), therefore, not as a contributor to that volume but as Australia's representative on the ICA Descriptive Standards Group. I seek to redress a misapprehension which some of our members might entertain, after reading that review, as to the nature of our contribution to the international debate on descriptive standards.

Acknowledging a 'sharply analytical and pragmatic' Australian voice, Eastwood perceives our interest in ideas from 'away' to be evidence of that insularity ('more than usually interested to know how they stack up against the rest of the world') which he believes is shared by people who live entirely surrounded by water. In this context, I could scarcely be forgiven if I did not remark that everyone lives entirely surrounded by water—it's just a matter of perspective. The Australian perspective he describes thus:

I detect a certain competitiveness, even aggressiveness towards other conceptions, often of the same ideas . . . For instance, I think it is quite wrong to suppose that the international rules (and the Canadian ones which have heavily influenced them) for archival description which are emerging are somehow incompatible with the Australian way of thinking. I believe this misconception comes about because the Australian system and the Canadian and international rules are not really comparable. There are no Australian rules; there is no system in the Australian sense in the rules . . .

Because the rules as they currently exist never expose the theory of classification behind them in enough detail, there is ample room to see fundamental difference where difference means to the same end exist.

It must not be supposed that our response to *ISAD(G)*, the international rules referred to (and, by extension, the Canadian ones), has been aggressive, insular, or uncomprehending. At least we have not, presumably, been woolly-minded or impractical. Such *ad hominem* arguments are, of course strictly beside the point (even if we were aggressive and competitive and have misunderstood, and this is not conceded, it neither invalidates our arguments nor answers them). I wish, however, to assure my colleagues here that our response has not been of so unyielding a character.

Firm it has been—and none the worse for that. Because our suggestions for modifications to the international rules (and, by extension, to the Canadian ones) have been root-and-branch stuff, not just fine tuning, they may have distressed northern sensibilities but the record is available to anyone who wants to see it and I am satisfied that no fair reader will find them to be aggressive. We have, on the contrary, acknowledged the difficulty of the Commission's task and its willingness to accommodate some of our suggestions for change.

The Australian response to the ICA rules was formulated after widespread consultation here. It turns out that we are certainly not insular in any strict geographic sense. The criticisms we made of the ICA rules (and, by extension, the Canadian ones) as a result of that process were made also by others from elsewhere in the world—and from inside Canada if it comes to that—most of whom don't use our system. We may well have misunderstood, but if we have we are not alone—and we're not in bad company either.

Nor have we sought to impose our rules on others or 'win' some imagined contest. We have stated in writing (and I have several times repeated inside the Commission) that we do not wish ICA to adopt the Australian system as the international standard. Our overriding desire, and one of my chief purposes in participating in the Commission, has been to ensure that the final version of the rules should accommodate (not be hostile to) our descriptive practice—that it should accommodate both traditions. This is a cosmopolitan, not an insular, view.

We have had to make the same point at home to at least one archives which does not use the series system and was apprehensive that a national standard should accommodate different approaches. We were able to assure them that we wanted changes to the international rules which achieved just that—not to narrow their application to allow only one approach. The *Common Practice Manual*, which has emanated from our negotiations with the ICA, has been formulated using a selection of archives which includes some not using CRS.

Finally, the question of who misunderstands whom turns on this proposition that there are no Australian rules and that the ICA rules (and, by extension, the Canadian ones) are 'system-independent'. The idea seems to be that the ICA/Canadian rules are free of assumptions about system and can, therefore, be applied regardless of the system used. I make no apology for saying that this is nonsense. Of course there are assumptions about system in the ICA rules—and Eastwood apparently agrees ('the rules . . . never expose the theory of classification behind them in enough detail'). You can no more have system-

independent rules than you can have a shapeless statue. In the same way, descriptive rules must be inferred from the Australian system.

When the international rules were first enunciated together with an associated set of principles (and those documents are now part of a public record) they clearly did not accommodate our system as anyone who looks back at them will immediately see. They could not be applied using the CRS approach because of their implicit system assumptions ('the theory of classification behind them'). We were not alone in seeking revision of both documents on the basis that the underlying theory of classification behind the rules was too narrow as a basis for an international descriptive standard. This, in part, is what we said:

...we believe that a variety of practice presently exists and that alterations to practice must occur over time. We believe the *Principles* should, as far as possible, provide an unvarying, common theoretical underpinning for a variety of practical applications (present and to come).

The aspiration of standardising these applications as far as possible is a good one. We support it. Our chief difficulties with the drafts arise from the manner in which it is being attempted by the ICA Committee.

It is critical to an understanding of our difficulties with the drafts that you appreciate that we are not here arguing the intrinsic merits of an 'Australian' system over the . . . the draft *Principles*. What we are saying is that the draft confuses a statement of principles (which if cast in other terms we believe could be endorsed) with a statement about the particular application of those principles which does not accommodate the variety in existing practice and, by extension, will be unable to accommodate necessary future change. This latter flaw will, in our view, prove fatal even if the former is ignored.

...we now enumerate three issues which we believe would need to be considered if *ISAD(G)* were to be adapted to better serve Australian practice:-

- (1) Descriptions of Records must not be limited by custodial considerations. . .
- (2) Allowance must be made for Description of Context and Provenance to be developed independently of the description of records. . .
- (3) Allowance must be made for more than one records creator when attributing a "unit of description"—i.e. for multiple provenance attribution at the series level (cf. 3.2.1). . .

While these requirements clearly reflect differences in approach from the one contemplated in *ISAD(G)*, it appears to us that it would not be impossible, though it would be difficult, to re-construct *ISAD(G)* in a way which allowed for both approaches within a common standard. . .

The rules were, in fact, redrafted to meet some (and by that I do not mean few) Australian concerns. The result better accommodates both Australian and ICA system assumptions (and, by extension, the Canadian ones) but the rules are no more system independent now than they were to start with. They are just better framed to allow one more approach within the common standard—partly, I trust, as a result of our constructive intervention.

Chris Hurley
Australian Representative
ICA Ad Hoc Commission on Descriptive Standards

20 June 1995

Dear Sir

I am grateful for the opportunity to respond to Chris Hurley's impressions of my review of *The Records Continuum*, for I would be distraught were they widely shared.

I do not think that Australians have been aggressive, insular, and uncomprehending in their participation in international standards work (which I am in no position to judge and did not intend to) or in any other regard. On the contrary, I applaud their active involvement in these affairs, think that they are far more cosmopolitan in outlook than many other islands of archival discourse, and find any of them with whom I have conversed to be in perfectly good comprehending order. On the contrary, I had hoped my review would be taken to sing in praise of Australian accomplishments. I grant Hurley that certain of my efforts to sum up the rich veins of archival thought reflected in the volume were perhaps insufficiently explained, but I doubt it will serve any good purpose to try to retrieve them now or explain them, save on one score, which is at the heart of what seems to be a simple misunderstanding of what I was driving at.

I believe that discussion of the difference between the Australian and Canadian approaches runs into difficulties because the two are not directly comparable, for the Australian one is a system in a particular sense of that

word and the Canadian rules are not. The Australian system as it has been developed in the Commonwealth/Australian Archives is the working system or method of administrative and intellectual control in that institution, and has passed to other institutions in variable ways, as Hurley points out. The Canadian rules, much as they might be influenced by Canadian institutional practice, are not a system or method in that sense. Therefore, the two are not directly comparable, which does not mean that the Australian approach to description cannot be compared with the vision of it communicated in the Canadian rules, just that the comparison is more difficult for not being a direct one, like thing to like thing.

There is a significant difference between the process of developing rules for the content of descriptions and the process of establishing a systematic, common practice of administrative and intellectual control. The Canadian effort results in *Rules for Archival Description*, the Australian counterpart in the proposed manual of common practices. Certainly, RAD is in the thick of institutional efforts to transform control of holdings in my country, where there has never been anything like a common method of control comparable to the Australian one. In fact, I would say that Canadian practice heretofore has been the product of a rather blunt pragmatism, as the report *Towards Descriptive Standards* of a decade ago documented. What is taking place now in Canada is an effort to apply the rules in various applications, but, of course, the rules are silent about many matters of system building, for they are but a tool in that process. As I tried to point out, the rules do not elaborate a complete theory and method of classification or arrangement, hence the work to go over much of the same ground trod by Scott and company about record groups versus fonds, series, and so on reflected in the volume *The Archival Fonds: From Theory to Practice*.

I would say that the difficulty many foreign archivists overseas have in understanding the Australian system is that they learn of it through description of its features, still very general descriptions, though ever more refined and 'sharply analytical' (we never heard of entities, attributes, and relationships in those terms in the article by Scott and colleagues), which is why I said it is necessary to see it on the ground to appreciate details of implementation. In that sense, the essays on the Australian system in the volume I reviewed are like the rules, which say nothing about how institutional applications are built. In the sense in which I have just exposed the matter, the rules are application-independent, just as Hurley's article on the series system is independent of any particular institutional application. That is what I meant to convey.

In short, the original series system (as it was then called) was conceived and implemented in the Commonwealth Archives, and its conceptualisation communicated and its methods adopted or adapted elsewhere. Writing rules in Canada forced archivists there to address the very same theoretical issues, and they are now using the rules in various ways to improve descriptive work, but, as yet, they have not worked out a systematic method of administrative and intellectual control to be applied in institutional settings. These differences often get in the way of adequate comparison and understanding of each other's experience.

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