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Amanda Milligan
Historic Environment Division
Level 6, Causeway Exchange
1-7 Bedford Street
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25 January 2017

Dear Ms Milligan,

The Way Forward for Archaeology in Northern Ireland: A Draft Proposal

The Joint Nautical Archaeology Policy Committee (JNAPC) has pleasure in responding to the draft proposal for The Way Forward for Archaeology in Northern Ireland.

Joint Nautical Archaeology Policy Committee

The JNAPC was formed in 1988 from individuals and representatives of institutions who wished to raise awareness of the United Kingdom's underwater cultural heritage and to persuade Government that underwater sites of historic importance should receive no less protection than those on land. Some information on the JNAPC is shown in Appendix 1.

The JNAPC has a membership (see Appendix 2) that includes most of the governmental, academic, commercial and voluntary organisations concerned with submerged heritage assets, including the Nautical Archaeology Society, university professionals, various governing bodies for recreational diving, a number of archaeological contractors prominent in the marine sector, the Council for British Archaeology and the Chartered Institute for Archaeologists.

The Way Forward for Archaeology in Northern Ireland

General

Northern Ireland has some outstanding examples of underwater cultural heritage. The waters around Northern Ireland have a substantial number of shipwrecks that have the potential to inform the ways in which society has developed, bearing in mind the big themes of archaeology that underpin our investigations. Shipwrecks appeal to divers, and to tourists and the stories of the wrecks and the individuals involved in the wrecking are powerful tools in engaging local communities. Underwater cultural heritage is certainly a driver to engage a wide range of individuals and groups in the promotion of Northern Ireland as a destination for 'consumers' of heritage and of active players in

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the development of the story, particularly if avocational groups are fully engaged in the researching, recording, documenting and promulgating of the individual wrecks studied.

The Draft Proposals

With that in mind the JNAPC particularly welcomes the recognition in Section C of the synthesis of key points from the Symposium that

- Marine/ maritime archaeological matters must be included in consideration of procedures, standards, legislation etc.
- The UNESCO Convention on the Protection of Underwater Cultural Heritage (2001) needs to be ratified

And we also agree that

- Regulation plays a critical role in protection.
- Regulatory methods/procedures need reviewed to be stronger and unambiguous and to tackle gaps, and to be streamlined as much as possible.
- The enforcement regime needs to be strengthened.
- [There is a] Need to remove any legal ambiguity around the ownership of objects.

However, the importance of protecting the marine historic environment (as well as the terrestrial environment) so clearly recognised in the Symposium is not fully reflected in the vision of success set out in the draft proposal. We appreciate that ratification of the UNESCO Convention is not solely within the gift of government in Northern Ireland, but we would urge the administration to support calls for the ratification of the Convention by the United Kingdom and to include in its vision of success further bulleted points as follows:

- Northern Ireland's marine historic environment is fully valued and protected
- The UNESCO Convention on the Protection of Underwater Cultural Heritage (2001) has been ratified by the United Kingdom

JNAPC would be delighted to assist in the further development of the draft proposals. In the meantime, if there is anything further that I can do to assist, please do not hesitate to contact me.

Yours sincerely,

R A Yorke
Chairman

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Appendix 1

JOINT NAUTICAL ARCHAEOLOGY POLICY COMMITTEE

THE JNAPC - PAST, PRESENT AND FUTURE

The JNAPC was formed in 1988 from individuals and representatives of institutions who wished to raise awareness of Britain's underwater cultural heritage and to persuade Government that underwater sites of historic importance should receive no less protection than those on land.

The JNAPC launched Heritage at Sea in May 1989, which put forward proposals for the better protection of archaeological sites underwater. Recommendations covered improved legislation and better reporting of finds, a proposed inventory of underwater sites, the waiving of fees by the Receiver of Wreck, the encouragement of seabed operators to undertake pre-disturbance surveys, greater responsibility by the Ministry of Defence and the Foreign and Commonwealth Office for their historic wrecks, proper management by government agencies of underwater sites, and the education and training of sports divers to respect and conserve the underwater historic environment.

Government responded to Heritage at Sea in its White Paper *This Common Inheritance* in December 1990 in which it was announced that the Receiver's fees would be waived, the Royal Commission on the Historical Monuments of England would be funded to prepare a Maritime Record of sites, and funding would be made available for the Nautical Archaeology Society to employ a full time training officer to develop its training programmes. Most importantly the responsibility for the administration of the 1973 Protection of Wrecks Act was also transferred from the Department of Transport, where it sat rather uncomfortably, to the then heritage ministry, the Department of the Environment. Subsequently responsibility passed to the Department of National Heritage, which has since become the Department for Culture, Media and Sport (DCMS).

The aim of the JNAPC has been to raise the profile of nautical archaeology in both Government and diving circles and to present a consensus upon which government and other organisations can act. Heritage at Sea was followed up by Still at Sea in May 1993 which drew attention to outstanding issues, the Code of Practice for Seabed Developers was launched in January 1995, and an archaeological leaflet for divers, Underwater Finds - What to Do, was published in January 1998 in collaboration with the Sports Diving Associations BSAC, PADI and SAA. The more detailed explanatory brochure, Underwater Finds - Guidance for Divers, followed in May 2000 and Wreck Diving – Don't Get Scuttled, an educational brochure for divers, was published in October 2000.

The JNAPC continues its campaign for the education of all sea users about the importance of our nautical heritage. The JNAPC will be seeking better funding for nautical archaeology and improved legislation, a subject on which it has published initial proposals for change in *Heritage Law at Sea* in June 2000 and *An Interim Report on The Valletta Convention & Heritage Law at Sea* in 2003. The latter made detailed recommendations for legal and administrative changes to improve protection of the UK's underwater cultural heritage.

The JNAPC played a major role in English Heritage's (now Historic England) review of marine archaeological legislation and in DCMS's consultation exercise *Protecting our Marine Historic Environment: Making the System Work Better*, and was represented on the DCMS Salvage Working Group reviewing potential requirements for new legislation. The JNAPC has also been working towards the ratification of the UNESCO Convention on the Protection of the Underwater Cultural heritage 2001 with the preparation of the Burlington House Declaration, which was presented to Government in 2006 and the Seminar on the Protection of Underwater Cultural Heritage in International Waters Adjacent to the UK in November 2010.

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In 2013 the JNAPC was officially accredited as an NGO to the Scientific and Technical Advisory Board and to the Meeting of States Parties of the 2001 UNESCO Convention.

The JNAPC continues to advocate the improved protection of underwater cultural heritage in both territorial and international waters and is working to persuade the UK Government to ratify the 2001 UNESCO Convention.

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Appendix 2

Joint Nautical Archaeology Policy Committee

Chairman

Robert Yorke

Member Organisations

Association of Local Government Archaeological Officers	Robin Daniels
British Sub Aqua Club	Jane Maddocks
Chartered Institute for Archaeologists	Tim Howard
Chartered Institute for Archaeologists, Marine Archaeology	
Special Interest Group (MASIG)	Toby Gane
Cotswold Archaeology	Michael Walsh
Council for British Archaeology	Mike Heyworth
Maritime Archaeology Trust	Garry Momber
Mary Rose Trust	Christopher Dobbs
Maritime Archaeology Sea Trust (MAST)	Jessica Berry
National Maritime Museum	Nick Ball
National Museums & Galleries of Wales	Mark Redknap
Nautical Archaeology Society	Brian Minehane
Professional Association of Diving Instructors	Suzanne Smith
RESCUE	Stephen Appleby
Sea Change Heritage Consultants	John Gribble
Shipwreck Museum, Hastings	Peter Marsden
Society for Nautical Research	Alistair Roach
Sub Aqua Association	Stuart Bryan
United Kingdom Maritime Collections Strategy & ICOMOS	Christopher Dobbs
Wessex Archaeology	Euan McNeill

Individual members

Sarah Dromgoole
Antony Firth
David Parham
Ray Sutcliffe
Michael Williams

Affiliation

University of Nottingham
Fjordr Limited
Bournemouth University
Maritime Heritage Trust
Plymouth University

Observers

Advisory Panel on Historic Wrecks, English Heritage
Cadw
The Crown Estate
Department for Culture, Media and Sport
Department for Transport
Department for Communities (Northern Ireland), Historic Environment Division
Foreign and Commonwealth Office
Historic England
Historic Environment Scotland
Maritime and Coastguard Agency, Receiver of Wreck
Ministry of Defence
National Trust
Royal Commission on the Ancient and Historical Monuments of Scotland

Tom Hassall
Polly Groom
Matthew Clear
Gill Graham/Hannah Jones
Stephen Galvin

Rory McNeary
Lowri Griffiths/Stephen Taylor
Joe Flatman
Philip Robertson
Alison Kentuck
Nick Kelsall
Ian Barnes

Alex Hale

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