

An advisory Council to the
Department of the Environment

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Prof. Gabriel Cooney BA MA PhD
Chairman

Via email

21st January 2010

Susan Cramer
Marine Policy Team
Department of the Environment
Calvert House
23 Castle Place
Belfast
BT 1 1FY

Dear Ms Cramer,

Thank you for the opportunity to comment on the Marine Strategy Framework Directive: Putting in place the legal framework for implementation.

In broad terms of course the Historic Monuments Council welcomes the establishment of the legal framework which will allow the transposition of the MSFD into UK law by 10 July 2010. At a time of increased change and pressure on the marine area the need for member states of the European Union to develop a marine strategy, including determining Good Environmental Status (GES) for their marine waters is clearly of crucial importance.

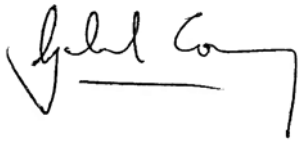
However, the Historic Monuments Council is very disappointed that there is little or no specific mention of cultural heritage protection in the MSFD framework. Indeed the 11 indicators laid down in the directive that are to be used as the basis for the initial assessment of the current environmental status of Member State's marine waters make no reference to cultural heritage. This is despite the fact that particularly in inshore waters, but more broadly across the marine zone there is a very important physical heritage of past human activity and change. In turn it is that heritage and human/nature interaction that has created the current environmental status of the marine zone. How can a sustainable policy be put in place if it does not consider this interaction, seek to measure it and to conserve the character and quality of the marine heritage as part of the dynamic development of the marine zone in the future?

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In Northern Ireland The Department of the Environment, Northern Ireland is the competent authority for assessing the current environmental status of the marine waters and for implementing the Directive. In this context the Historic Monuments Council would strongly recommend that the Department would consult with the Built Heritage Directorate of the NIEA, the competent authority for the identification and protection of cultural heritage in the marine zone, to ensure that the **cultural heritage is taken into account both in determining the environmental status of marine waters, and critically as a factor in the definition of Good Environmental Status for the marine waters of Northern Ireland.**

The Council understands that an Interdepartmental Marine Working Group has been established to consider issues such as the transposition of MSFD, the UK Marine Bill and the Northern Ireland Marine Bill. The Historic Monuments Council would strongly recommend that the Built Heritage Directorate should be represented on this group to ensure that an integrated approach, incorporating cultural heritage, will be taken in the marine strategy.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Gabriel Cooney', with a horizontal line underneath the name.

Professor Gabriel Cooney
Chair