



Environmental Audit Committee
Inquiry on 25 Year Environment Plan

Written Evidence submitted by
Honor Frost Foundation (HFF)
Steering Committee on Underwater Cultural Heritage

1. The HFF Steering Committee on Underwater Cultural Heritage advises and helps shape the policy and work of the Honor Frost Foundation, which was founded in 2011 and seeks to foster and promote the protection of underwater cultural heritage. Our evidence can be summarised as follows:
 - The 25 Year Environment Plan makes no reference to cultural heritage in Chapter 5 on seas and oceans. This is a major and surprising gap that leaves the Plan wanting in several important areas.
 - To safeguard historic wrecks in which the UK has an interest beyond its own territorial waters, the Government should ratify the 2001 UNESCO Convention as a matter of urgency.
 - The Government's approach to understand the full value of the marine environment should draw on the expertise of its historic environment advisors in Historic England and in civil society.
 - In introducing a sustainable fisheries policy, the Government should look at the good practice that is developing between the UK fishing industry and the cultural heritage sector.
 - Good Environmental Status (GES) as defined in the EU Marine Framework Directive omits cultural heritage and the relationship between natural and cultural heritage. Consequently, GES -- and the UK Marine Strategy aligned with GES -- do not provide a comprehensive foundation for the 25 Year Environment Plan. The UK Marine Policy Statement -- which recognises and makes provision for the importance of the marine historic environment -- provides a better framework.
 - The Government's promised review of marine targets and indicators -- and its marine online assessment tool -- should encompass the whole of the marine environment including cultural heritage.
 - Government should be encouraged to take a more joined-up approach to archaeological sites within Marine Protected Areas (MPAs) and introduce Historic MPAs as in Scotland.

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2. Noting the Environmental Audit Committee's concern for major gaps in the 25 Year Environment Plan, we would like to draw attention to the absence of any reference to cultural heritage in Chapter 5 on seas and oceans. This chapter rightly starts (p. 104) by noting that our seas and oceans are an integral part of our history, but then makes no provision for the huge wealth of historic and archaeological sites that make up our maritime past.
3. Coastal heritage and historic sites such as shipwrecks are critically important to our economy, supporting multi-million pound sectors including tourism, coastal recreation, diving and sea angling. The Honor Frost Foundation recently published a study on *The Social and Economic Benefits of Marine and Maritime Cultural Heritage*, available here: http://honorfrostfoundation.org/wp/wp-content/uploads/2015/11/HFF-Report_Social-Economic-Value-of-Marine-and-Maritime-Cultural-Heritage.pdf.
4. The Government's acknowledgement that it makes sense to work with others to achieve its objectives in the marine environment (p. 105) is also true of cultural heritage. The *2001 UNESCO Convention on the Protection of the Underwater Cultural Heritage* provides the best international framework for protecting UK interests in historic shipwrecks in international waters and the territorial waters of other countries. The Government should be encouraged to undertake its promised review and ratify the 2001 UNESCO Convention as a matter of urgency (see <http://honorfrostfoundation.org/wp/wp-content/uploads/2016/04/2001-Convention-The-Case-for-Ratification-FINAL.pdf>).
5. As noted on p. 106, Government needs to understand the full value of the marine environment. It is encouraging that Government recognises that an understanding of social and historical values can help support stewardship and sustainability. It is very important that this commitment is thoroughly embedded in the Government's approach and that they draw on the expertise of their historic environment advisors in Historic England and civil society.
6. In introducing a sustainable fisheries policy (p. 106-107), the Government should be encouraged to look at the good practice that is developing between the UK fishing industry and the cultural heritage sector. The inclusion of features of archaeological or historic interest within the scope of marine environmental matters for the purposes of Inshore Fisheries and Conservation Authorities (IFCAs) has been an important advance. Great progress is being made in encouraging the fishing industry to record archaeological discoveries made in the course of fishing, to reduce impacts from gear on sites on the seabed, and to safeguard the heritage of the fishing industry itself. By acknowledging both the important history of the fishing industry and the role that fishermen play in safeguarding the marine environment, it is entirely possible to achieve tangible benefits for industry and for the historic environment together.

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7. Unfortunately, when the EU introduced ‘Good Environmental Status’ (p. 107) it did not consider cultural heritage as part of the marine environment. This is a major flaw that the 25 Year Environment Plan should not perpetuate when we leave the EU. In contrast to GES (and the UK Marine Strategy that is aligned with GES), the UK Marine Policy Statement makes good provision for the historic environment offering a more comprehensive UK model. It is essential that the Government’s promise (p. 107) to review its marine targets and indicators – and its marine online assessment tool – should encompass the whole of the marine environment including cultural heritage, not just Good Environmental Status as defined by the EU Marine Framework Directive.
 8. The continued commitment to marine plans and marine licensing on p. 107 is welcome, giving effect to the commitment to the historic environment set out in section 2.6.6 of the UK Marine Policy Statement. The UK MPS clearly recognises the importance and critical role of heritage in the marine sphere:

2.6.6.2 The historic environment of coastal and offshore zones represents a unique aspect of our cultural heritage. In addition to its cultural value, it is an asset of social, economic and environmental value. It can be a powerful driver for economic growth, attracting investment and tourism and sustaining enjoyable and successful places in which to live and work.
 9. Although the Government’s continued support for a network of well-managed MPAs is welcome (p. 108), the lack of provision amongst MPAs for cultural heritage is again a major gap. Government should be encouraged to take a more coherent approach to archaeological sites within MPAs, and to introduce a means for protecting Historic MPAs as adopted in Scotland.
 10. Elsewhere in the 25 Year Environment Plan, the Government’s vision encompasses cultural as well as natural heritage in its approach to sustainable development and protecting natural capital and wellbeing. Enhanced heritage is one of the Government’s 25-year goals. The Government should be encouraged to maintain this comprehensive approach in its plan for the marine environment, reflecting the rich interplay of human and natural processes in how we live with the sea. Engaging with people as well as nature is essential if we are really going to leave the marine environment in a better state than we found it.
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11. Annex II of the 25 Year Environment Plan sets out Government strategies to protect and improve the environment. However, Annex 2 does not include either *Our seas – a shared resource: high level marine objectives* (2009) or – surprisingly – the *UK Marine Policy Statement* (2010).

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Both of these documents regard cultural heritage at sea as an integral component of the marine environment.

12. *Our seas – a shared resource* refers to cultural heritage under two objectives:

Ensuring a strong, healthy and just society

People appreciate the diversity of the marine environment, its seascapes, its natural *and cultural heritage* and its resources and act responsibly.

Promoting Good Governance

The use of the marine environment is spatially planned where appropriate and based on an ecosystems approach which takes account of climate change *and recognises the protection and management needs of marine cultural heritage according to its significance.*

13. The UK Marine Policy Statement includes the following policy:

2.6.6.3 The view shared by the UK Administrations is that heritage assets should be enjoyed for the quality of life they bring to this and future generations, and that they should be conserved through marine planning in a manner appropriate and proportionate to their significance. Opportunities should be taken to contribute to our knowledge and understanding of our past by capturing evidence from the historic environment and making this publicly available, particularly if a heritage asset is to be lost.

14. Annex III of the 25 Year Environment Plan notes the UK's international agreements to protect or improve the environment. The agreements listed in Annex III include the *1982 United Nations Convention on the Law of the Sea* (LOSC 1982) (Annex III No. 21). LOSC 1982 includes the following obligation in Part XVI General Provisions:

Article 303 (1): States have the duty to protect objects of an archaeological and historical nature found at sea ...

15. Also included in Annex III is the *2000 European Landscape Convention* (ELC)(Annex III no. 10). Critically, the ELC 2000 defines landscape as 'an area ... whose character is the result of the action and interaction of natural *and/or human factors*' (Article 1(a); emphasis added). The UK's international obligations as set out in ELC 2000 encompass 'the entire territory of the Parties ... It includes land, inland water *and marine areas*' (Article 2).

16. It is of concern that the UK's international agreements with respect to cultural and archaeological heritage are not set out in Annex III alongside its other environmental commitments. In particular, Annex III should include the *1992 European Convention on the Protection of the Archaeological Heritage (Revised)* which the UK ratified in September 2000. The obligations to cultural heritage that the UK accepted through this Convention also extend to cultural heritage at sea: the 1992 Convention applies to archaeological heritage 'in any area



within the jurisdiction of the Parties' (Article 1(2)(iii)) 'whether situated on land *or under water*' (Art. 1(3)).

About the Honor Frost Foundation

17. The Honor Frost Foundation's mission is to promote the advancement and research, including publication, of marine and maritime archaeology with particular but not exclusive focus on the Eastern Mediterranean with an emphasis on Lebanon, Syria and Cyprus.
18. The Foundation also seeks to foster and promote the protection of underwater cultural heritage (UCH).
19. The Foundation was founded in 2011 with a legacy from the pioneering underwater archaeologist Honor Frost. For further information please see <http://honorfrostfoundation.org/>.

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