



Philip Stamp
Department for Environment, Food and Rural Affairs
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Marinelicensing.Consultation@defra.gsi.gov.uk

05 September 2013

Dear Mr Stamp,

Consultation on Marine Licensing Applications – charges for monitoring and for varying licences

Thank you for the opportunity to comment on this consultation.

The Institute for Archaeologists

The Institute for Archaeologists (IfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

IfA has over 3,000 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

In matters relating to maritime archaeology IfA is assisted by its Maritime Affairs Group (MAG), to which most professional maritime archaeologists belong. The Group exists to:

- advance the practice of maritime archaeology by promoting professional standards for the management, conservation, understanding and enjoyment of the maritime archaeological resource;
- provide advice and commentary to IfA on matters relating to maritime archaeology;
- aid in the development of professional guidelines and standards for the execution of maritime archaeological work;
- promote the training of archaeologists and others in maritime archaeological practice; and,
- facilitate the exchange of information and ideas about maritime archaeology and to communicate these to the wider profession.

Marine Licensing Applications – charges for monitoring and for varying licences

The Institute strongly supports measures to ensure that sites are properly monitored. Such monitoring is extremely important for environmental protection (including protection of the marine historic environment).

1. Do you have comments on whether the Government should extend the MMO's ability to recover costs associated with marine licensing by charging application fees for :-

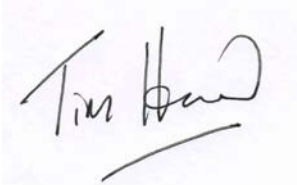
a. Monitoring costs?

b. The costs of varying licences?

1. IfA does not oppose these proposals in principle, but is concerned to see that the effect of such changes on small and medium-sized organisations and individuals (and, in particular, those involved in research and activities of a non-commercial nature) is not disproportionate. In this regard, we note that the proposals are not intended to apply to businesses of fewer than 10 employees and genuine start-ups (see paragraph 39 of the Impact Assessment).

If there is anything further that we can do to assist, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tim Howard', with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch
Policy Advisor