

Heritage Council's Policy Paper on:

Agriculture and the National Heritage

The Heritage Council

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Foreword

In carrying out its functions to propose policies and priorities for the national heritage **The Heritage Act, 1995, (6) (1)** the Heritage Council recognises the potential impact which agricultural payments can have on that heritage.

If existing schemes are to be retained the Council considers the recommendations contained in this report to be essential for the identification, protection, preservation and enhancement of the national heritage. However, the Council's work in other areas, particularly its examination of state sector spend on heritage, suggests that the potential impact of agriculture as a whole extends beyond these schemes and impacts on the entire socio-economic structure of the countryside.

A handwritten signature in black ink, reading "F. Rountree". The signature is written in a cursive style with a large initial 'F' and a long, sweeping underline.

Freda Rountree
Chairperson
THE HERITAGE COUNCIL
March 1999

Introduction

Until recently Ireland's nature conservation policy concentrated almost exclusively on site-based conservation initiatives. With the transposition of the European Union's Habitat Directive into Irish law, and the signing of the Convention on Biological Diversity, all sectors of the economy, including agriculture, are now linked to nature conservation objectives. Consequently Ireland's nature conservation policy is required to take a radical shift from almost exclusively site-based initiatives to strategic action. This shift in emphasis has been slow and difficult in Ireland, but the Heritage Council welcomes this development. The Council looks forward to the time when nature conservation becomes an integral part of all agricultural and other socio-economic policies.

Agriculture is the principal land use in Ireland and is of vital importance for maintaining much of Ireland's biological and landscape diversity. All of the Irish landscape has been modified to some extent by farming activity, consequently there are no truly natural areas remaining in the country. Yet in spite of this, much of the Irish countryside has significant nature conservation value, and this has been maintained by farming activity. If Ireland's biological and landscape diversity is to be maintained and enhanced, it is essential that a pastoral type of farming continues to be the dominant land use in the country. This will require continued support for agriculture from state or other sources. However, agriculture has experienced a considerable amount of change over the last few decades which has placed immense pressure on the farming community to specialise and intensify production, which in turn places greater stress on Ireland's heritage. Much of this change has been driven by, and is the result of, agricultural policy based on schemes which were established to guarantee commodity price and maintain farm income. Consequently relatively minor policy and administrative changes to these schemes could have a major beneficial environmental impact. For all agricultural schemes, every effort must be made to provide positive incentives to farmers to manage their land in line with heritage objectives and phase out incentives that result in damage to the national heritage.

The following recommendations are intended to highlight changes which could be made to existing agricultural schemes to have an impact on maintaining and enhancing Ireland's heritage. Acceptance of the recommendations will ensure effective identification, protection, preservation and enhancement of the national heritage through these schemes. The schemes considered are:

1. Rural Environment Protection Scheme
2. Ewe Premium Scheme (incorporating the Rural World Premium)
3. Beef Payments
4. Arable Aid Scheme
5. Early Retirement from Farming Scheme
6. Afforestation and Premium Scheme
7. Measures to Reduce Water Pollution from Agriculture

1. Rural Environment Protection Scheme

1.1 In response to the legal requirement to put in place a national agri-environment scheme in Ireland, the Rural Environment Protection Scheme (REPS) was established by the Department of Agriculture, Food and Forestry (latterly the Department of Agriculture and Food.). The stated objectives of the REPS are:

- To establish farming practices and controlled production methods which reflect the increasing concerns for conservation, landscape protection and wider environmental problems;
- To protect wildlife habitats and endangered species of flora and fauna;
- To produce quality food in an extensive and environmentally friendly manner.

The REPS is generally regarded as a positive programme in the sense that it has stimulated discussion amongst the farming community about the environmental problems associated with farming activities in the countryside. The fact that it is a scheme which deals with protecting the wildlife value of farmland, administered for and by the agricultural sector, is also a very positive and welcome development. However, wildlife protection and conservation is a complex and involved discipline in its own right, and if the wildlife conservation aspects of the REPS are to be maximised, considerable ecological input into the organisation, administration and evaluation of the scheme is needed. One of the ways to achieve this is to have a special ecology and nature conservation unit within the Department of Agriculture & Food.

Recommendation: that a special ecology and nature conservation unit is established within the Department of Agriculture & Food to oversee the wildlife conservation and wider landscape issues of the REPS and other agricultural schemes.

1.2 One of the major weaknesses of the REPS at present is that there is no comprehensive monitoring or evaluation of how the scheme is, or is not, achieving its objectives of protecting wildlife. Without comprehensive data on the success of the scheme in relation to wildlife protection, it is impossible to fully demonstrate the benefits of the scheme, to identify areas which need improvement or indeed, to justify its continuance. A monitoring and evaluation programme needs to be put in place to assess the impact the REPS is having on the protection of wildlife on farmed land. In order to evaluate the scheme, detailed and comprehensive baseline information on the wildlife value of all land entered into the scheme needs to be established as a matter of urgency. A monitoring programme would then have sound information on which to assess the impact of the REPS. This monitoring programme should be undertaken by qualified ecologists, preferably from the special ecology and nature conservation unit within the Department of Agriculture and Food recommended earlier.

The Heritage Council is aware that a number of studies have commenced which are examining different aspects of the REPS. While these initiatives are welcome, and

will lead to a greater understanding of specific aspects of the scheme, they do not address the need for a monitoring and evaluation programme as an integral part of the REPS.

Recommendation: that a monitoring and evaluation programme, beginning with the recording of detailed baseline data, is developed and becomes an integral part of the REPS, to enable the assessment of the efficacy of the scheme in relation to wildlife protection.

1.3 The success or otherwise of the REPS is dependent on the appropriateness of the management prescribed at the farm plan level. In this way, the role of the REPS planner is central to the success of the scheme. The expertise and judgement of the farm planners is vital for making the scheme workable and effective for delivering wildlife protection at the individual farm level. The Heritage Council acknowledges the work which the Department of Agriculture & Food has done in the training of farm planners and in monitoring their adherence to the conditions of the scheme. However, as part of the scheme is aimed at the protection of wildlife on farmland, greater efforts must be made to improve the ecological expertise of all REPS planners, or increasing the input by ecologists. To this end, there should be greater training in ecology and wildlife conservation management for REPS planners.

Recommendation: that extensive training in ecology and wildlife conservation management is provided for REPS planners, and that there is increased input by qualified ecologists.

1.4 One of the problems associated with many of the initiatives designed to benefit wildlife in Ireland is the dearth of information on ecology and conservation management, and the apparent failure to recognise the need to rectify this information deficit. Many of the management prescriptions outlined in REPS are based on 'expert opinion' which is a legitimate approach in the establishment of a new scheme. However, a programme of research should be undertaken to increase the level of knowledge on wildlife management on farmland under Irish conditions, thus allowing informed decisions to be taken on the correct management prescriptions to introduce under the REPS. This research programme could be done in co-operation with Dúchas - The Heritage Service and the third level education institutions.

Recommendation: that a programme of research on the wildlife management of farmland in Ireland is undertaken to enable informed decisions to be taken on the correct management prescriptions to introduce under the REPS.

1.5 The important role of the REPS planners in guaranteeing the success of the REPS cannot be over-emphasised. Yet the manner in which the scheme is currently administered places conflicting pressures on the planners, and leads possibly to a reduction in the effectiveness of the scheme. The role of farm planners in the surveillance and enforcement of the scheme may present difficulties, given the financially competitive environment in which they work. The Department of Agriculture & Food should examine ways in which this difficulty can be eliminated.

Recommendation: that the Department of Agriculture & Food examine ways to ensure that competitive forces do not place undue pressure on the role of the farm planners.

1.6 The REPS is one of the most comprehensive agri-environment schemes in the EU, and has great potential to make a real contribution to delivering environmentally sustainable agriculture in Ireland. The fact that it is a whole farm scheme and one which addresses a range of heritage issues including wildlife, archaeology, vernacular architecture and public access, makes it potentially a far-reaching scheme. However, the success of the scheme is limited by farmers being restricted to applying for only one supplementary measure. If a tightly controlled cumulative payments system was introduced, where farmers could obtain more than one payment for undertaking positive measures which relate to a range of heritage issues, this would be of enormous benefit to Ireland's heritage. For example, farmers within designated areas such as SACs and NHAs are precluded from availing of the organic farming supplementary measure despite the obvious environmental benefits. It would provide a opportunity for farmers to move from a specialised intensive farming system approach to one which is more extensive and diversified.

Recommendation: to introduce a cumulative payment system to encourage farmers to take positive steps for the enhancement of the natural heritage on their farms.

1.7 The way in which the REPS is currently administered focuses on maintaining the level of wildlife interest of participating farms, rather than providing incentives to enhance the wildlife value of farmland. At present farms with the greatest wildlife value in terms of habitat diversity and other farms with little habitat variety and correspondingly low wildlife interest will receive a similar level of payment (per hectare). In order to redress this imbalance, and to encourage farmers to undertake more active wildlife management, a tiering system of payments offering higher payments for quality habitat land should be introduced. This would result in farmers with the best quality habitats receiving higher level of payments, thus placing true value in farms which contribute most to maintaining biological diversity.

Recommendation: that a tiered payment system under REPS, offering higher payments for the maintenance of quality habitat land, be introduced.

1.8 Under the terms of the REPS, certain participating farmers can increase the productivity of land by increasing fertiliser application, up to the recommended application levels. In most cases, increasing productivity of this kind actually reduces biological diversity of habitats and can result in a decrease in wildlife value. This is particularly true of certain grassland habitats. On land which currently receives little fertiliser application, the REPS should endeavour to maintain this low level rather than allowing an increase as is currently allowed.

Recommendation: that for land with little or no fertiliser application prior to REPS entry, this lack of fertilisation should be maintained as part of the REPS conditions.

1.9 The level of fertiliser application recommended under the REPS appears to be too high. Teagasc have revised downwards their agronomic recommendations with the objective of achieving optimum yields of grass and efficient use of phosphorus fertiliser, but these are still higher than those recommended by the Ministry of Agriculture, Fisheries and Food in the U.K. Despite this, the phosphorus levels recommended under the REPS are substantially higher than those recommended by Teagasc. The Department of Agriculture & Food should adopt the recommendations from Teagasc on phosphorus levels, or lower levels, for the REPS.

Recommendation: that the Department of Agriculture & Food adopt the Teagasc recommended phosphorus levels, or lower levels, for the REPS.

1.10 Supplementary Measure 1: Natural Heritage Areas and Special Areas of Conservation

The REPS is used as the principal vehicle for encouraging environmentally sustainable farming in sites designated either as proposed Natural Heritage Areas (NHAs) or Special Areas of Conservation (SACs). Much of the REPS scheme and associated NHA conditions were negotiated and agreed prior to the transposition of Council Directive 92/43/EEC of 21 May 1992 on the Conservation of Natural Habitats and Rare Fauna and Flora (the Habitats Directive) into Irish law. The Habitats Directive requires the establishment of a series of Special Areas of Conservation across Ireland for the conservation of habitats which are rare in Europe. The legal obligations under this Directive are unambiguous in that they require these rare habitats and populations of species to be maintained at a favourable conservation status. The requirements of the Directive are far more stringent than those required for NHAs, thus the current REPS measures are unlikely to meet the requirements of the Habitats Directive. Dúchas - The Heritage Service and the Department of Agriculture & Food must provide quantitative and qualitative data to demonstrate that the measures currently in place meet the legal requirements of the Habitats Directive. Until such time as this can be done, Dúchas - The Heritage Service must take its statutory responsibilities seriously and put in place alternative mechanisms to protect these important habitats.

Recommendation: that Dúchas - The Heritage Service put in place alternative mechanisms to ensure that the favourable conservation status of SACs is maintained until such time as it can be demonstrated in quantitative and qualitative terms that the current REPS measures are adequate to meet Ireland's obligations under the Habitats Directive.

1.11 As the REPS is used as the principal mechanism for meeting conservation objectives in SACs, Dúchas -The Heritage Service must have direct involvement in the organisation, administration and enforcement of this aspect of the REPS. The current situation where Dúchas -The Heritage Service has no formal mechanism for examining the farm plans and assessing the appropriateness of the farming conditions prescribed for farm plans within SACs is unsatisfactory. If the REPS is to be maintained as the main mechanism for implementing the Habitats Directive on farmland, then Dúchas - The Heritage Service must have direct formal access to all REPS plans within SACs.

Recommendation: that Dúchas - The Heritage Service has direct formal access to all farm plans within SACs.

1.12 Supplementary Measure 2: Rejuvenation of Degraded Areas

The Heritage Council is concerned that despite the designation of Degraded Areas and the operation of the REPS the problem of overgrazing in parts of Ireland particularly in western areas is as serious as ever, and that the measures in place have been ineffective in dealing with the problem. The Heritage Council welcomes the revised measures to counteract overgrazing and hopes that they will result in an immediate and radical reduction of grazing pressure in western and upland areas.

The revised Degraded Areas REPS package is important as it incorporates a number of elements which should become standard for all future schemes. These include:

- Increasing the level of payment to farmers for delivering real environmental benefit,
- Extending the lifetime of the scheme to ensure some degree of continuity,
- Having a direct input from ecologists,
- Establishing a scientific baseline on the state of habitats, from which future changes can be measured.

The success of this scheme is dependent on correct stocking rates being prescribed by the REPS planners. To facilitate this, there must be constant monitoring of the affected areas and evaluation of the effectiveness of the measures by qualified ecologists. This revised package must be implemented as a matter of urgency.

Recommendation: to implement the revised Degraded Area package as a matter of urgency, and to monitor its effectiveness in redressing the serious overgrazing problem.

1.13 The Heritage Council understands that special schemes targeted at specific conservation objectives, such as the conservation of the corncrake, are to be subsumed into the larger REPS. This policy decision is a serious, retrograde step. Nature conservation is an issue which requires considerable expertise and resources. For specific conservation objectives, where detailed conservation management is required, specially tailored schemes should be developed, or as in the case of the corncrake, maintained. REPS is a very positive scheme but it should not be treated by Dúchas - The Heritage Service as a catch-all, nor used as the only instrument for implementing nature conservation policy in the wider countryside.

Recommendation: that using the REPS as a catch-all for nature conservation management be avoided, and that for specific conservation objectives, separate specially designed schemes are put in place.

1.14 While the REPS is a very positive development there are real opportunities to modify the scheme to enhance and maximise its value for wildlife conservation in the wider countryside. For the next round of REPS it is recommended that, at the very least, the following changes are made.

- i. The new round of REPS must begin with a baseline study of each farm on a field by field basis to be undertaken when each farm first enters the scheme. This will enable an assessment of the progress made in environmental management through the course of the scheme.
- ii. REPS plans should be required to identify all wildlife habitats on the farm. This would require the direct involvement of qualified ecologists.
- iii. REPS plans should deal in greater detail with habitat management.
- iv. The provisions made in the Agri-Environmental Regulation (2078/92) for the support of 'the cultivation and propagation of useful plants adapted to local conditions and threatened by genetic erosion' should be incorporated into the next round of REPS in order to encourage cultivation of threatened native crop varieties and animal breeds.
- v. New REPS should place greater emphasis on environmental enhancement in order to in addition to the increase biological diversity in addition to the maintenance of existing habitats and features. The creation of new habitats should also be provided for in each REPS plan.
- vi. The focus of the new REPS on less intensive, small and medium farms should remain.
- vii. REPS has an important role as an income supplement measure, but its primary focus must be to reward farmers for undertaking positive measures towards sustainable farming practice.

The Heritage Council has called for a National Habitat Survey to be undertaken with the purpose of identifying and establishing inventories of all habitats in Ireland. If the above recommendations were implemented, the data on farm habitats collected as part of the REPS plan could form a major component of the National Habitat Survey.

1.15 Less than 10% of the Irish countryside has been identified as having formal nature conservation value, i.e., SPAs, SACs and NHAs. In the remainder of the Irish countryside there are a range of habitats and sites which would benefit from positive heritage management or restoration by landowners. Despite the success of REPS, in its current format it is unlikely to be an option for close to two-thirds of Ireland's farmers, leaving a very large portion of the countryside without any agri-environment incentives. Measures should be put in place to ensure the maintenance, management and restoration of these heritage sites and habitats, by providing a financial incentive for farmers for carrying out specific work. This could be done either through the introduction of a new agri-environment scheme targeted at those farms which are unsuited to participation in the existing REPS, and/or through the development of an effective landscape policy. This is a policy area currently being addressed by the Heritage Council.

Recommendation: that financial incentives are put in place to ensure the maintenance, management and restoration of heritage sites and habitats on farms which are unsuited to participation in the current REPS. This could be done either by establishing a new agri-environment scheme and/or developing an effective landscape policy in Ireland.

2. The Ewe Premium Scheme

(INCORPORATING THE RURAL WORLD PREMIUM)

2.1 The Ewe Premium is an EU-wide system for the support of the sheepmeat sector, which has resulted in serious overstocking and associated overgrazing in many western areas. Although the problem of overgrazing has been apparent since the 1980s, little effective action was taken until April 1998 when environmental cross-compliance was introduced. Now farmers in degraded commonages will only be eligible for Ewe Premium and sheep headage payments if they agree to enter the REPS and abide by measures designed to reduce grazing pressure under a framework plan for each commonage. The Heritage Council welcomes this initiative, and hopes its rapid and effective implementation will lead to the regeneration of habitats on the western commonages. Environmental cross-compliance of this kind should also be introduced for unimproved coastal grasslands associated with dunes and machairs which are currently under threat from overgrazing and for other habitats that are under threat.

Recommendation: to extend the cross-compliance operational in degraded commonages to include dune, machair and other habitats which are currently under threat from overgrazing.

2.2 Although there was a reluctance on the part of some government bodies to accept the serious overgrazing problem in many western areas, the negative environmental impact of the Ewe Premium has now been accepted. Yet despite official acceptance of the problem, this EU-wide scheme is still administered in a fashion which continues to support the overstocking of many western areas. Introducing environmental cross-compliance is a very positive step, but it tackles symptoms rather than the root cause of the problem. Having one scheme, the REPS, whose main purpose in Degraded Areas is to counteract the negative effects of another scheme which is linked to production, namely the Ewe Premium, makes no sense. The Irish Government should insist on the amendment of the Ewe Premium Scheme in order to provide compensation to farmers for de-stocking in degraded areas.

Recommendation: that the Irish Government work with the European Commission to amend the Ewe Premium Scheme in order to provide compensation to farmers for de-stocking in degraded areas.

3. Beef Payments

Suckler Cow, Special Beef and Extensification Premiums

3.1 Beef payments were increased following the Common Agricultural Policy reforms of 1992 to compensate farmers for falls in market support. These payments make a very important contribution to farm incomes in Less-favoured Areas, and probably have been responsible for many smaller farms remaining economically viable, thus maintaining farmers that might otherwise have left farming entirely. To this end, the success of these payments must be recognised. Despite this positive aspect of the payments, it is unfortunate that the payments were not conditional on meeting specific environmental objectives. For instance, the current scheme, which calculates payments on the basis of utilised agricultural area, may lead indirectly to the removal of important wildlife habitats by transferring them to grassland in order to increase the area of qualifying land. However, if specific environmental conditions were attached to the payments, it would have the result of targeting more effectively the payments to the least intensive farmers, which are also those most likely to have land of the highest nature conservation value.

3.2 Under the Agenda 2000 proposals the EU Commission has highlighted the need to identify ways in which the incentives to extensify production can be strengthened in order to improve their effectiveness in meeting environmental objectives. The Commission is proposing that the extensification premium be significantly increased, and that qualification for the premium would be made more rigorous. The Heritage Council welcomes this development, and recommends that the Department of Agriculture & Food redirect a proportion of the subsidies to target specific environmental priorities. This could be done by linking a proportion of the overall budget to area payments as opposed to headage payments. This would allow the Irish authorities to target areas of the country with high nature conservation value, or low intensity farmers who are likely to have farmland of high conservation value.

Recommendation: that the Extensification Premium be linked to specific environmental criteria by allocating a proportion of the total budget for meeting environmental objectives.

4. Arable Aid Scheme

4.1 The Arable Aid Scheme is designed to control cereal production and compensate farmers for a reduction of 30% in cereal prices following CAP reforms. It is a very important scheme for specialist cereal growers representing 83% of output value in 1997. Although the scheme is voluntary, in practice almost all farmers avail of the scheme as it is economically worthwhile because of the reduced cereal prices. Payments are conditional on the area under cereals on each farm not increasing and on a proportion of the land being set-aside and not cropped each year. Currently the set-aside scheme is seen by the European Commission as merely a means of controlling output, and the management of set-aside generally is not beneficial to wildlife. This is very unfortunate as the correct management of this land has enormous potential to enhance the biological diversity of agricultural land in intensively farmed areas. The Heritage Council welcomes the Agenda 2000 proposal which allows Member States to introduce a five year set-aside scheme, in order to enhance the potential environmental benefits. The Department of Agriculture & Food should avail of this option and ensure that the potential benefit of set aside is maximised.

Recommendation: that strategic action is taken to ensure that set-aside land is managed in a manner which maximises its potential for enhancing biological diversity on farmland.

5. Early Retirement from Farming Scheme

5.1 The Early Retirement from Farming Scheme was introduced as part of the Accompanying Measures in the CAP reforms of 1992. The objective of the scheme is to redress the small farm size by increasing and re-structuring other holdings, and reducing the high age profile of farmers, two of the main structural defects identified in Irish farming. It offers incentives for full-time farmers aged between 55 and 66 to transfer their farms to qualified young farmers by providing an annual pension for ten years up to a farmer's 70th birthday. Member States are required to ensure that all farms involved in the scheme are managed in a manner that protects the countryside. In the Irish context, participating farmers are required to farm in harmony with the requirement of EU and national legislation on environmental protection. Other than this general requirement there are no specific guidelines for environmental management. This general requirement in relation to environmental protection has very limited application in Ireland as there is a dearth of national legislation dealing with nature conservation in the wider countryside outside sites designated under European directives and state-owned land.

5.2 In its current form, the Early Retirement from Farming Scheme could provide an incentive for habitat removal with the young farmer endeavouring to increase productivity of the land. Before any land is transferred under this scheme, there should be a site visit by an ecologist to assess the wildlife value of the land. Where land is found to be of high conservation value, management prescription should be attached as conditions of the transfer, similar to conditions prescribed under the REPS.

Recommendation: that any land proposed for qualification under the Early Retirement from Farming Scheme be assessed for its nature conservation value, and for land of high conservation value management prescriptions be attached as a condition to the transfer of land.

6. Afforestation and Premium Scheme

6.1 In the overall context of afforestation the Heritage Council recommends the priorities identified in its policy paper on forestry. Much of future forestry planting will occur on enclosed land, and often on the most unproductive land from an agricultural perspective. This unproductive land is often the main area of nature conservation value within farm holdings, thus any trend to increase the rate of planting of these areas could have serious adverse implications for biological diversity in the Irish countryside. To ensure that the biological diversity of agricultural land is maintained, unproductive areas which are of nature conservation value should be identified and efforts made to ensure that farmers receive a sufficient level of payment to maintain these habitats, making planting a less profitable option. Existing areas of semi-natural woodland should be conserved.

Recommendation: that sites of high nature conservation value on farmland should not be planted, and that landowners receive sufficient payment to manage these areas for their continued heritage value.

6.2 Hedgerows are of very high nature conservation importance in the Irish countryside, and special measures are required for their protection under the terms of the EU Birds and Habitats Directives. However, hedgerows could also be viewed as a possible farm timber resource. At present Ireland's hedgerows are undervalued both in terms of wildlife value and timber potential. They are not considered an asset and are being removed. This is a very undesirable trend in terms of maintenance of biological diversity in the countryside. Special measures should be targeted at hedgerow management to demonstrate their importance as an on-farm resource, thereby enhancing their value and leading indirectly to their maintenance on the farm. A financial incentive under the forestry programme, aimed at planting native species, grown from local seed, would be of enormous benefit to enhancing the value of farmland for wildlife. This could form an important element of a landscape policy for Ireland, and link in with any new agri-environment scheme targeted at farms which are unsuited to participation in the current REPS.

Recommendation: to introduce a financial incentive for hedgerow management under the forestry programme aimed at planting native species, grown from local seed.

7. Measures to Reduce Water Pollution from Agriculture

7.1 A catchment management approach, such as recently introduced in Lough Ree and Lough Derg, should become accepted practice throughout the country. This is the only practical way of balancing all of the pressures on water resources in each catchment, and may well become mandatory under the proposed EU Water Framework Directive.

Recommendation: that a catchment management approach should become accepted practice throughout the country and the proposed EU Water Framework Directive should be effectively and efficiently implemented.

**THE HERITAGE COUNCIL
MARCH 1999**