Annex 7

Expert opinion of underwater archaeological research (18 pages)

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EXPERT OPINION

Assessment of potential cultural heritage objects

Task:

Findings of underwater cultural heritage objects (UCH) in the offshore area designated for Development of Curonian Nord Offshore Wind Farm.

UCH report is an integrated part of Environmental Impact Assessment Report

Client:

Ignitis Renewables

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The following materials were provided by the client for the preparation of the opinion:
Profiles (mosaic) from sonar surveys
Excerpts from ROV footage of the inspection of the discovered wreck
Geophysical Survey Results Report
'Ignitis Renewables Field Memo 02 BA Wreck 231123'.

1. Introduction

Natural conditions

Renewables is developing a new offshore wind farm (OWF) in the Baltic Sea, 50 km north-west of Klaipeda in Lithuania. The survey site covers a total area of 120.9 km^2 with water depths ranging from approximately 27.0 m to 49.0 m below MSL. In accordance with Geophysical Survey Results Report *"the seafloor at the site was shaped by glacial history and affected by variable near-seafloor currents resulting in relict bedforms and complex morphological features described as areas of asymmetric ridges, bars and ripples, boulder fields, complex seafloor morphology, linear to sinuous ridge, smooth seafloor with local erosion features, linear depressions, outcropping and subcropping till, patches of ripples and plough marks."* Given the depth and remoteness from the shoreline, the possibility of locating settlement remains was ruled out. Potential heritage features include wrecks of transport vessels (ships, aircraft). Due to the nature of the bottom sediments, wreck structures should be clearly visible in the sonar survey documentation. The Geophysical Survey Results Report provides information on the location of 5783 magnetic anomalies. It is likely that these may include movable artefacts, for example, such as anchors, armament, fragments of cargo or equipment from sunken transport units.

Shipping and maritime trade in the study area - basic historical data

The largest port located on the Lithuanian coast is Klaipeda (Memel). The city and port were founded by the Teutonic Order in 1254. The port is located at the entrance to the Curonian Lagoon, but despite its relatively convenient location, it was of lesser importance in Baltic trade, giving way to ports such as Königsberg, Elblag and Gdansk. In 1520 Grand Master of the Teutonic Knights Albrecht of Prussia decided to establish a customs house there. Fees were collected from skippers entering and leaving Klaipeda. They had to use a pilot at the entrance to Klaipeda. Based on the customs books, in which ship traffic was registered, it is possible to reconstruct the number of ships, and the type of goods transported in each year. A. Groth's compilation of ship traffic on this basis states that, respectively, for the years 1664 -1722, an average of 32 sailing ships with a total average tonnage of 1020 sails entered the port annually. He goes on to write that "data on ship traffic in other Baltic ports makes it possible to determine the role of Klaipeda in Baltic Sea shipping"[1].

From the 17th century onwards, there was a revival in the ports serving the territory of what is present-day Lithuania. The reason for this was a change in the nature of the Baltic trade from grain and its derivatives to other commodities allowing for the acceleration of the expansion of the English merchant and war fleets. 'In a situation where no longer grain but forestry goods were at the top of the list of exports from the Baltic zone, when the demand for them in western Europe was steadily increasing, then the main region of supply from the Commonwealth became the lands of the Grand Duchy of Lithuania. They were more wooded than the Crown, and certainly more than 50% at the beginning of the 17th century. The forest cover of the areas bordering Podlasie and Prussia was still higher than elsewhere in the mid-19th century, exceeding 70%. Although 'forest goods' were also floated (by the rivers Narew and Bug) to Gdansk, the focus of timber felling and export flows shifted

from the Vistula to the Niemen and Dvina, and partly also to the Pregel, that is from Gdansk and Elblag to Königsberg and Riga. These waterways, the Nemunas and the Pregel, from the beginning of the 15th century, i.e. from the deepening of the Dejma Canal connecting the Pregel with the Curonian Lagoon and the Niemen, began to play the role of a link between Königsberg and the Lithuanian markets. However, it was not until the 16th century, with the creation of a convenient exit from the port to the sea through the Pilawa Strait and the construction of a canal connecting the branch of the Nemunas - the Gilga - with the Dejma Canal and further with the Pregolema - that the trade relations between Königsberg and Lithuania gained momentum'.
Königsberg was not the only port of the Grand Duchy of Lithuania. After all, Klaipeda, which was dependent on Gdansk and Königsberg capital and exported and imported some of its goods through both ports, played a service role to Königsberg. Riga also played a huge role for Lithuania. But at the same time, the same cities or complexes of landed estates that maintained regular trade with both these ports also exported goods to Gdansk and Elblag.

Königsberg acted as an intermediary 'between the vast Lithuanian and, to a lesser extent, Mazovian hinterland' and western Europe. It was this hinterland (of today's eastern Belarus and northern Lithuania) that from the mid-16th century supplied Königsberg and Riga with a large range of products, above all hemp, potash, leather, ash, wood and flax, plus tar, linen, linseed, vegetable oil and furs (mink, sable, marten, fox, wolverine). From 1786 to 1791, Königsberg was also the main grain port of the Grand Duchy. Perhaps this role of Königsberg as the main grain port of the Grand Duchy of Lithuania at the end of the 18th century was the result of the completion of the Oginsky Canal in 1784, connecting the port of Gdansk, which was more expensive after the trade treaty with Prussia.

In Königsberg, Lithuania mainly bought salt (this was the distinguishing feature of these contacts), but also sugar, pepper, saffron, French wines, glass, glaziers and glasses, and, in addition, English and Dutch cloth, herring, lime and iron. The scale of the trade is demonstrated by the example of Hieronim Florian Radziwill, who also owned estates in eastern Belarus. He used the Niemen River to send "*wicinas*" (a wicina - a large river ship, used mainly on the Niemen) to Königsberg with goods: in 1738. - 14, in 1746. - 14, in 1747. - 13, in 1748. - 18. Thus, these were considerable flotillas, which on a return voyage (e.g. in 1745) brought back 8850 scythes, 579 iron bars, 321 barrels of herring, 399 scales of salt and other goods on one voyage alone.

Given the very high risk of shipwrecks that characterised shipping at the time, it is reasonable to assume that, with such intensive trade, they also occurred in the trade routes leading to the ports of Königsberg, Riga and Klaipeda. Shipwrecks dating back to the last century are also monuments and, above all, an important source of scientific information on recent history. Many of them should therefore be considered in the planning process for any investment. Due to the type of propulsion (fuel) and armament, they may also pose a threat to the environment and the project itself. The possibility of mines and other types of UXO should also be considered. In 2021, an 'Analysis of the pollution of the Baltic Sea, with particular reference to ships sunk during the First and Second World Wars' was prepared for the Office of Analysis, Documentation and Correspondence of the Chancellery of the Senate of the Republic of Poland. Amongst the figures, it states that in the Gulf of Finland and Gulf of Riga, during the First World War, the Russians laid at least 21,000 sea mines which continued during the Second World War due to the strategic location in the Skagerrak, on the routes of entry to the Baltic Sea and in the Gulf of Finland and Gulf of Riga. A tragic example of minefield casualties are the wrecks discovered in Estonian waters in 2010 of three British warships, HMS Cassandra, which sank in

December 1918, with 10 sailors killed, HMS Myrtle and HMS Gentian, both of which went down in July 1919, with nine men killed.

List of ships that went missing in the Königsberg - Memel - Riga port area

For the archive search, the Lloyd's Register Wreck Returns records made available online by the Lloyd's Register Foundation were used. The search was based on information concerning the sinking of vessels that had Klaipeda (Memel) or the nearby ports of Riga, Königsberg and St Petersburg mentioned in their voyage. The search was conducted in volumes for the years 1890 -1900. The spelling has been retained in accordance with the original.

List of abbreviations used in the table:

Dan. Denmark

Ger. Germany

Rus. Russia

U. K Great Britain

Swd Sweden

Yearbook	**Name of vessel**	**Country**	**Route of travel**	**cargo**	**description**
1894	Marie Magdalene	Dan.	Riga-Grangemoutk	Pit props	Not heard of since November, 1893.
1894	Edgar	UK	Tyne-St. Petersburg	Coal	In the Baltic :30 th April
1896	Viola	Swd.	Riga-Apenrade		In the Baltic 3rd Dec
1897	Valkyrien	Dan.	English Channel-St./ Clay - Peters burg		Near Gotland About 15thMay
1898	Lisa	Rus.	St. Petersburg-Leith	Oilcake	Sailed from St. Petersburg on 23rd Sept.; not since heard of.

1898	Adele	Ger.	Holtenau Konigsberg		bottle subsequently picked up off Heisternest stating vessel sinking
1898	Anna Maria	Ger.	Memel-Leer	Wood	Condemned Oct
1899	Bravo	Rus.	z Rygi	Ballast	Near entrance to Memel Harbour About 2ndDec.
1899	Grandholm	U. K	Methil-Memel	Coal	At entrance to Memel 2lst Oct
1899	Agathe	Ger.	Middlesbro'-Memel	Salt	At Immersatt 10 Jan
1900	Golgatha	Rus.	Shields-Riga		Sailed from Shields on, th Oct.,1 1899: not since heard of.
	Fortuna	Rus.	- Riga		wrecked 05 July
	Alida.	Rus.	Kaleten-Riga		18th Sept

2. Legal basis and system of protection of monuments in Lithuania

International regulations

United Nations Convention on the Law of the Sea UNCLOS

The most important international law document on the use of marine areas including sea space is the UN Convention on the Law of the Sea (UNCLOS). It is the key document underlying all other international and national regulations on the use of marine areas.

The protection of the UCH has been written about in two articles:

Article 149 Archaeological and historical objects

All objects of an archaeological and historical nature found in the Area shall be preserved or disposed of for the benefit of mankind, particular regard being paid to the preferential rights of the State or country of origin, or the State of cultural origin, or the State of historical and archaeological origin.

Article 303 Archaeological and historical objects found at sea

1. States have the duty to protect objects of an archaeological and historical nature found at sea and shall cooperate for this purpose.

2. In order to control traffic in such objects, the coastal State may, in applying article 33, that their removal from the seabed in the zone referred to in that article without its approval would result in an infringement within its territory or territorial sea of the laws and regulations referred to in that article.

3. Nothing in this article affects the rights of identifiable owners, the law of salvage or other rules of admiralty, or laws and practices with respect to cultural exchanges.

4. This article is without prejudice to other international agreements and rules of international law regarding the protection of objects of an archaeological and historical nature.

In addition, the Convention divides maritime areas into territorial waters, contiguous waters and exclusive economic zone (EEZ), stipulating that in the first two the rules of national law apply to archaeological and historical sites (Articles 303, with reference to Article 33, and Article 2 of UNCLOS, which indicates 'that the sovereignty of a coastal State extends beyond its land territory and internal waters and, in the case of an archipelagic State, beyond its archipelagic waters, to an adjacent belt of sea called the territorial sea').

This is precisely the situation in the research area covered by this opinion.

UNESCO Convention on the Protection of the Underwater Cultural Heritage

Ratified by the Republic of Lithuania in 2006.

In accordance with Article 2 of the Convention, its objectives are to ensure and enhance the protection of the underwater cultural heritage (para. 1), to oblige signatory States to protect the underwater heritage (para. 3) and to cooperate among themselves in this regard (para. 2), and to take, together or separately as necessary, all appropriate steps consistent with this Convention and international law necessary for the protection of the underwater cultural heritage, for this purpose using the best available practice and the means at their disposal and according to their capabilities (para. 4).

Article 2, paragraphs 5 to 11 of the Convention set out the principles for the protection of underwater heritage. **The preservation of this heritage *in situ* has been identified as the overriding priority in the context of the licensing and implementation of any activity directed at underwater heritage (paragraph 5).** Excavated objects of underwater cultural heritage are to be secured, conserved and managed to ensure their long-term survival (paragraph 6). Underwater cultural heritage is not to be exploited for commercial purposes (para 7). The Convention does not have the effect of altering the rules of international law or practice of individual States in their sovereignty, nor the rights of individual States over vessels or aircraft owned by them (para. 8). Signatory States have an obligation to ensure that human remains resting in marine waters are shown proper respect (para. 9). They also undertake to encourage the responsible and non-destructive use of the underwater cultural heritage in situ for the purpose of observing and documenting it to raise public awareness and pride and to ensure its protection, provided that such activities do not interfere with the management and

conservation of the underwater cultural heritage (paragraph 10). Actions and activities undertaken under the Convention may not constitute grounds for claiming, challenging or questioning State sovereignty or State jurisdiction (para. 11).

Attached to the Convention are the so-called Principles Governing Actions Targeting Underwater Cultural Heritage, which form an integral part of the Convention. It is understood that these principles constitute a certain international standard of conduct in relation to underwater cultural heritage, failure to comply with which will expose the offender to sanctions introduced by States based on Article 17 of the Convention already described. The principles formulate in detail certain provisions of the Convention and introduce procedures for their implementation. Thus, Principle 1 reiterates that priority is given to the protection of the underwater cultural heritage by preserving it in situ, and that activities directed at the underwater cultural heritage are permitted subject to its protection and, subject to this requirement, may take place for the purposes of making a significant contribution to the safety of underwater cultural heritage sites, acquiring knowledge about them and enhancing their significance.

As further general principles, activities directed at underwater cultural heritage must not adversely affect it to a greater extent than is necessary to achieve the objectives of the project. They should be carried out using non-destructive survey techniques and methods, which are preferable to the excavation of underwater cultural heritage objects. Where excavation or excavation is necessary for scientific research or to ensure the protection of the underwater cultural heritage, non-destructive methods and techniques should be used to the extent practicable and such that the remains and remains are preserved. In carrying out the activities described above, unnecessary disturbance of human remains and memorials should furthermore be avoided.

Any activity discussed must be subject to strict regulation to ensure that cultural, historical and archaeological information is properly recorded. It is recommended that public access to the underwater cultural heritage in situ be allowed, unless this is incompatible with its protection and management. It is further recommended that international cooperation in the conduct of activities directed at underwater cultural heritage be encouraged to promote exchange and more effective work by archaeologists and other specialists.

National legislation

Protection of monuments at the national level is regulated by the Law on the Protection of Immovable Cultural Heritage (The Law on Immovable Cultural Property Values Protection of the Republic of Lithuania 1994 No I-733As last amended on 11 July 2019 – No XIII-2318)

References to underwater cultural heritage are formulated in the following provisions:

Article 2 Definitions

(3) ‘Archaeological research’ means basic and applied research aimed at the exploration of objects above ground, on the ground, underwater or partially underwater to gain new knowledge of past phenomena and processes and to gather information on preserved, altered or lost valuable archaeological features, to establish facts confirming the historical development of the studied object, to record and document them.

Article 3 Classification of immovable cultural heritage
(2) Underwater - archaeological sites, sites and items of immovable or movable property considered to be significant that are located wholly or partly under water, where the only or one of the main sources of scientific data on them are underwater surveys and finds.

Article 11 Protection areas, zones and subzones of cultural heritage objects and sites

(1) Areas of underwater cultural heritage objects and sites and areas of cultural heritage objects located in forests shall be described, established and formalised as objects of civil law and entered in the register of cultural property in accordance with the procedure established by this Law and other legal acts.

Article 17 Protection of immovable cultural heritage secured for scientific knowledge

(1) At an object secured for the purposes of scientific knowledge, on its territory, at the site, it is prohibited, without the consent of the institution responsible for the protection of cultural heritage, to use metal, electronic or other detectors to search for finds or archaeological and other objects, to move, examine, lift underwater objects, their separate parts or archaeological finds in inland waters, inland waters of the maritime area, territorial sea, contiguous zone and exclusive economic zone within the meaning of international agreements of the Republic of Lithuania.

Structure of the heritage protection system

The national policy for heritage protection is formulated by the Parliament, the Government and the Minister of Culture, considering the suggestions of the Government Commission for Cultural Heritage. The Minister of Culture organises the administration protecting cultural heritage. He approves legal regulations, heritage protection programmes (registration, management, conservation control and protection) financed from the central budget, identifies sites to be protected and those that should be included in the UNESCO World Heritage List.

Department of Cultural Heritage

This department plays a leading role in shaping policy for the protection of cultural heritage in Lithuania.

The Department deals with, among other things, suggesting methods and directions for the protection of cultural heritage, preparing drafts of legal acts regulating the protection of monuments, financing programmes for the registration and protection of historical objects, organizing and coordinating the compilation of inventories, monitoring the condition of cultural heritage, proposing to local self-government units to take over heritage objects for protection at the local level.

National Commission for Cultural Heritage

The National Commission for Cultural Heritage is an expert and advisory body to the Parliament, the President and the Government on heritage conservation policy. Among its tasks are to propose and make suggestions as to which heritage objects should be given monument status and which should be deprived of this status, to assess and approve proposals for the inclusion of movable heritage in or removal from the Register of Movable Cultural Objects.

Archaeological finds discovered during research should, if possible, be protected and displayed at the site of discovery. In other cases, they are transferred to museums with conditions for their conservation and display. Cultural heritage is protected in land use plans. This should be considered in the creation of spatial development plans specifying conditions for protection and the establishment of cultural reservoirs.

3. Assessment of the historic value of the located wreck 231123

Basis of the study:

1. Report on finding the wreck - “Ignitis Renewables Field Memo 02 BA Wreck 231123” (appendix no. 1). The report is accompanied by a description of the wreck in an attempt to identify it as the wreck of the submarine U-580.

2. Video documentation taken by ROV during inspection of the wreck.

3. Review of the literature on the subject

Online sources:

1. Fishing Fleet of Communist and Post-Communist Countries (https://soviet-trawler.narod.ru/main_en/list_of_projects.html)
2. Lithuanian Register of Cultural Objects Under Protection - Kultūros vertybių registras (https://kvr.kpd.lt/#/static-heritage-search)

Object characteristics

Basic data:
Location Easting/Northing 455217.96, 6208337.19 (Fig.1)
Water Depth 37.5 - 38 m at the wreck, 31 m above the wreck
Length 70 m
Width 12.5 m
Height 5.5 m
Depth max:38 m
Depth min. 32 m
Length 70 m
Width 12.5 m
Height 5.5 m

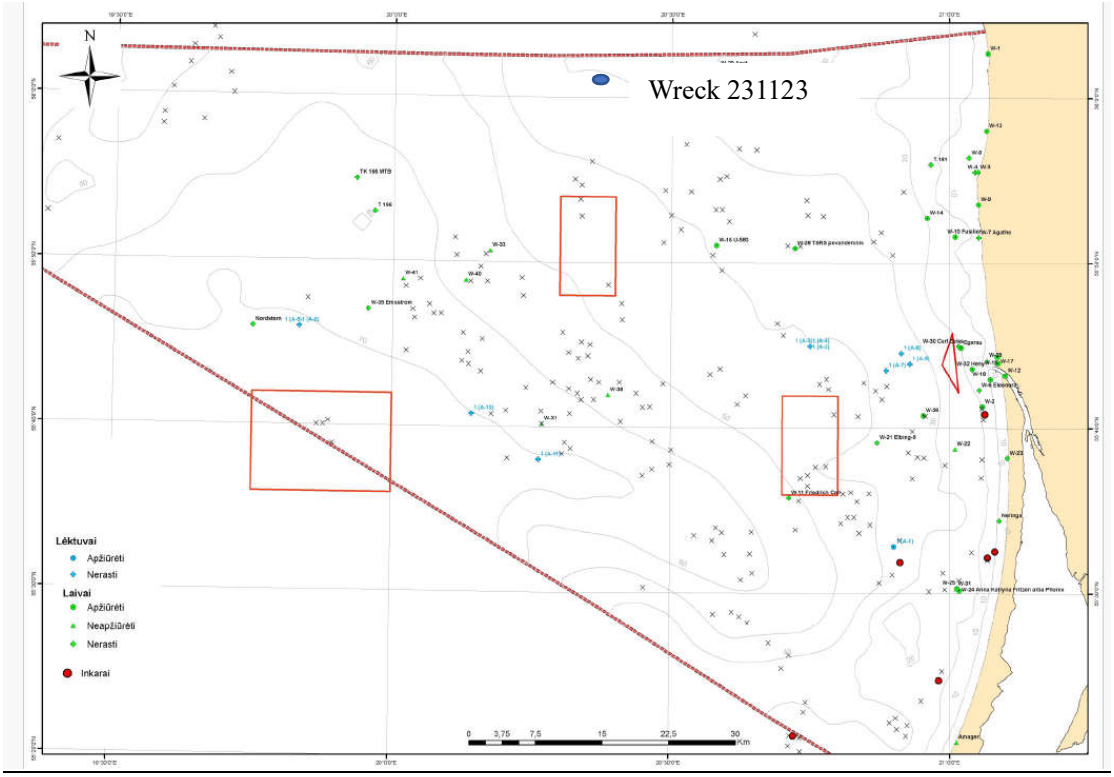

Fig. 1 Based on presentation by V. Zulkus "Protection and management of underwater cultural heritage in Lithuania", Riga 2013

Description of the state of preservation:

The wreck rests with its keel upwards on a flat, sandy bottom. It is laid out in a N-S direction. The stern faces North. The surface of the wreck is slightly overgrown. The maximum height above the bottom is about 7 meters in the stern and rear midship area.

The vessel was built in steel construction with welded, single-layer hull plating (the bottom of the vessel was probably double-layered). The remains of the bottom part of the hull are preserved in good condition. Large damage can be seen only in the bow section of the ship (Fig.2)

Fig. 2 View of a crack in the bow section of the shipwreck

Along the starboard side of the ship from bow to midship, broken sections of the side or bulwark structure are visible.

Fig. 3 Some of the fragments of the structure retained a characteristic profile

Some of the fragments of the structure retained a characteristic profile (fig.3), which may indicate the shape of the sides at the front of the ship.
A long section of anchor chain is visible in the bow area. The chain runs from the breach in the bow area through the hull of the vessel. No anchor was spotted in the video.

Fig. 4 The anchor chain

On the port side in the area of In In the bow section, a large crack in the sheathing is clearly visible.

Fig. 5 Large crack in the sheathing

The keel is preserved in its entirety (Fig. 6). The anti-tilt keel runs parallel to it. At the stern, the visible rudder fin is well preserved. The rudder column is fixed on the extension of the keel. The propeller was probably cut off. (Fig. 7)

Fig. 6 The keel

Fig. 7 The rudder column with rudder fin

No remnants of armaments or any distinctive pieces of equipment were spotted around the shipwreck.

An attempt to identify the shipwreck

Due to the scarcity of data, only a general determination of the age of the unit can be attempted. The most important indicator is the way the hull plating is welded together. Also,

the dimensions and proportions of the hull, as well as the shape of the rudder blade attachment can help in trying to determine the type of vessel.

On this basis, it can be assumed that the ship was built no earlier than the mid-1950s. Admittedly, the technique was already used to build the ship in the first half of the 20th century. For example, the Fullagar was built by Cammell, Laird and Co. in 1920 (Grace's Guide to British Industrial History). However, it wasn't until the mid-1950s that this method replaced riveting the plating of metal-framed ships.

The size and proportions of the vessel are like the trawler-type ships produced in the USSR since the 1960s. Similar vessels were also built in the other Baltic communist countries both on order from the USSR and for their own use. For example:

- in total 226 trawlers were built at Nikolaev and Klaipeda from 1958 to 1969
- 30 units of B-15 (fig 6) design were built at Gdansk from 1960 to 1967. Nine trawlers were built for USSR and 21 for Polish Deep Sea Fishing company "Dalmor". Polish vessels had some structural differences and the first trawler "Dalmor" was built according to the design B-15/II.

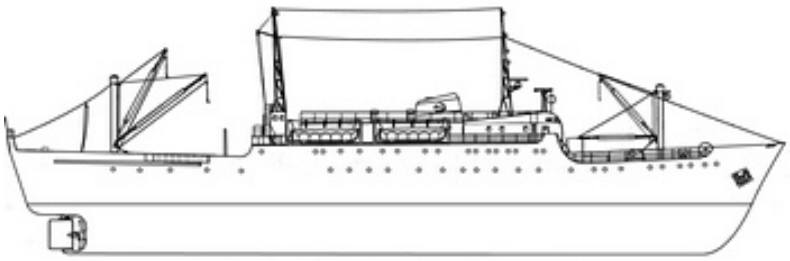

Fig. 8 "Leskov" type fishing freezer trawler

Length OA (m)84.72
Length BP (m) 75.00
Breadth extreme (m) 13.84

Trawlers were mainly used for fishing. Research, hydrographic vessels both civilian and military were also built on their hulls. Trawlers were also used for intelligence activities.

Assessment of heritage value based on current legislation.

The protection of monuments at the national level is regulated by the Law on the Protection of Immovable Cultural Property Values of the Republic of Lithuania of 1994, No. I-733, last amended on July 11, 2019. - No. XIII-2318.

References to underwater cultural heritage are formulated in the following provisions:

Article 2 Definitions

(4) “Archaeological finds” means objects or their remains that are man-made or bear traces of human existence, which have been found during research or otherwise, and that in themselves or in connection with other signs have scientific value in terms of historical knowledge. The previous owner of these items cannot be identified usually due to the considerable passage of time since the burial or disposal of said items. The bodies of the ancients or their remains are also considered archaeological finds.

Article 3. Classification of Immovable Cultural Heritage

2) underwater – the archaeological objects, sites and the items of immovable or movable property recognised as significant which are totally or partially under water, where the only or one of the main sources of scientific data thereon is underwater research and findings.

Article 11. Territories, Protection Zones and Sub-Zones of Objects and Sites of Cultural Heritage

4. The territories of objects and sites of underwater heritage and the territories of the objects of cultural heritage situated in forests shall be described, established and legalised as objects of civil right and registered in the Register of Cultural Property in accordance with the procedure laid down by this Law and other legal acts.

Archaeological finds discovered during research should, if possible, be protected and displayed at the site of discovery.

The above provisions are formulated in a very general way. To determine the evaluation criteria, it is necessary to take into account the recommendations arising from the UNESCO Convention on the Protection of the Underwater Cultural Heritage (2001) ratified by the Republic of Lithuania in 2006. Its definition defines “Underwater Cultural Heritage” in Article 1 (1) (a) as “all traces of human existence of a cultural, historical or archaeological nature that have remained or remain completely or partially underwater, periodically or permanently, for at least 100 years, including: (i) sites, structures, objects, artefacts and human remains, with their archaeological and natural context; (ii) ships, aircraft and other vehicles or their parts, cargo or other contents, with their archaeological and natural context; and (iii) objects of a prehistoric nature.”

On this basis, the following evaluation criteria can be determined:

1. Time of sinking of not less than 100 years.
2. Whether it has significant cultural, historical or archaeological value.

The wreck does not qualify for the first criterion. As shown earlier, it probably sank in the second half of the 20th century. Therefore, no special protection of this object seems advisable.

Other facilities of anthropogenic origin

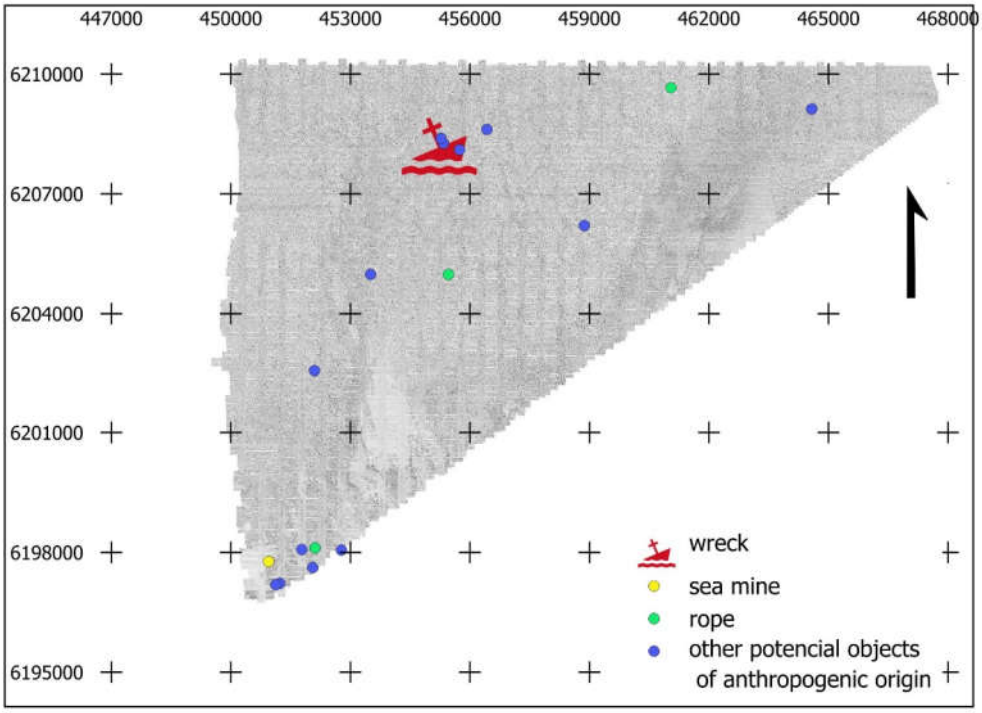

Fig. 9 Findings of potential underwater cultural heritage objects (UCH) in the offshore area designated for Development of Curonian Nord Offshore Wind Farm

Based on the analysis of the sonar results provided, 16 other objects were identified in addition to the wreck (Fig.9). Based on their shape, it can be assumed that they are of anthropogenic origin. It is possible that they are fragments of the construction of the above-described shipwreck. In a further addition, objects resembling ropes, and a sea mine were identified.

4. Conclusions and recommendations.

For the purposes of the EIA report, searches were carried out for archival data on the possibility of the presence of historical objects in the area of the planned project.

The primary source base is publications on the history of shipping and maritime disasters in the Baltic.

In the study area, no objects constituting monuments were detected. The only discovered wreck “Wreck 231123” is not an archaeological artifact. It was not possible to determine what the vessel was and when it sank. Also, a diving inspection of its contents has not been carried out.

The wreck itself is not a monument, but it is an obstacle to the planned investment. It is recommended to cover it with at least 50 meters of protective zone (protective buffer) counting from the extreme points of the wreck registered based on sonar surveys. This will allow to plan safely the location of turbines and the course of cable infrastructure. It will also protect the wreck itself from accidental destruction.

As a result of the analysis of the sonar data, 16 objects were identified that have a shape suggesting that they are the product of man (mostly located around the discovered wreck). Unfortunately, the sonar images only show that something is lying on the bottom, but do not give any possibility of interpreting what the object is. **Since these are small objects in case it becomes necessary to remove them from the seabed and the object turns out to be a monument, the Department of Cultural Heritage should be notified, which will indicate the proper procedure for proceeding.**