The Labour Court
Lansdowne House
Lansdowne Road
Dublin 4

2 March 2026

Re. Proposal for an SEO in the Commercial Archaeology Sector

We the undersigned are both licensed archaeologists and joint-managing directors of *Archaeology and Built Heritage Ltd.* (ABH). Founded in 2013, ABH has a full-time staff of 9 archaeologists and an office administrator, with several more employed on a fixed-term contract basis when we are in excavation mode.

We are a small business in an Irish context, with a specific range of expertise and an academic engagement perhaps not realised in the larger companies. Operating since 2013, we tender for and undertake the customary archaeological and heritage-based contracts: initial site assessments and heritage-planning consultancy work, through to excavation, post-excavation, and reporting; the preparation of Environmental Impact Assessment chapters; historic building analysis; and specialist post-excavation services.

We have a strong engagement with publication and with public archaeology. Our team recently won the 2025 Council for British Archaeology's award in the category of 'Public Dissemination or Presentation' for their work curating the St. Anne's Park Community Archaeology Programme in Raheny. Launched in 2021, the project is a diverse, annually evolving programme of activities and events centred on a community excavation of the former Guinness mansion of St Anne's. It includes training programmes for transition year (TY) students and tour guides, educational tours for schools and public lectures, along with community-led post excavation and public outreach events.

ABH has always prided itself in offering the highest wages in the archaeological sector on the island, where the emphasis has been less on profit and more on inculcating a sense of collegiality, with a collective knowledge contributing to outputs and reporting of a rigorous academic standard. We have as a result attracted, and continue to attract, some of the most-engaged archaeologists in the country and our alumni have gone on to work in senior positions in public-sector archaeology and into academia.

The imposition of a business ontology on archaeological practice has never been for the benefit of archaeologists, nor indeed has it benefited archaeology and the promotion of best practice in the profession. It is no secret that profits are made on excavations, where larger companies benefit from employing part-time excavation staff on low wages, sometimes with the non-binding promise of an extended contract as another excavation opens, a contract won on the basis of the low wages paid.

This is not a working environment which encourages the development of useful skills, where the wages paid do not especially encourage critical thinking or an engagement with the work in hand. Indeed even a minimum archaeological wage of €22.50 per hour does not, we believe, adequately compensate

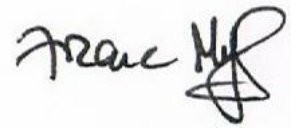
archaeological workers for their time spent in education or indeed the physical and intellectually demanding nature of the work involved.

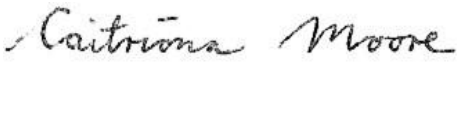
We do believe however that an SEO, in establishing legally binding rates of pay, will help create a level playing field and eliminate the opportunity to erode employment conditions as a means of undercutting the competition and securing a project. It will lend an element of certainty and stability to employers, archaeological workers and ultimately the client, where labour costs will be fixed for a minimum of three years.

We are therefore fully in support of Unite the Union's application for a Sectoral Employment Order in the Commercial Archaeology Sector and believe it will fulfil Section 16 of the Industrial Relations Amendment Act 2015, where it

> (a) would promote harmonious relations between workers and employers and assist in the avoidance of industrial unrest in the economic sector concerned, and
>
> (b) is reasonably necessary to
>
> (i) promote and preserve high standards of training and qualification, and
> (ii) ensure fair and sustainable rates of remuneration.

Yours Sincerely,





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