



February 27, 2015

The Board of Executive Directors of IBRD/IDA
The World Bank
1818 H. Street NW
Washington, D.C. 20433

Dear Chair and Members of the Board:

The Archaeological Institute of America (AIA) applauds the Review and Update of World Bank Safeguard Policies. We are pleased to note that cultural heritage will become a larger element for consideration in the future, and we welcome the opportunity to offer comments.

The Archaeological Institute of America is North America's oldest and largest organization devoted to the world of archaeology. The Institute is a nonprofit group founded in 1879 and chartered by the United States Congress in 1906. Today, the AIA has over 220,000 Members and more than 110 Local Societies in the United States, Canada, and overseas. Our members include professional archaeologists, corresponding members, students, and enthusiasts, all united by a shared passion for archaeology and its role in furthering human knowledge. Our mission states:

“The AIA promotes archaeological inquiry and public understanding of the material record of the human past to foster an appreciation of diverse cultures and our shared humanity. The AIA supports archaeologists, their research and its dissemination, and the ethical practice of archaeology. The AIA educates people of all ages about the significance of archaeological discovery and advocates the preservation of the world’s archaeological heritage.”

Ensuring the preservation of cultural heritage and, especially, its physical manifestations for the benefit of future generations is an increasing concern. Across the world cultural heritage is being destroyed through development, intensive agriculture, conflict and looting. This is obliterating artifacts, buildings, sites and entire landscapes. Mitigating such losses in the interests of humanity must be a key focus of the World Bank in the future.

We have three particular concerns arising from the text of the draft Review and Update.

- 1. No mechanisms are proposed that would ensure Borrowers meet international heritage preservation standards in their projects.**

It is essential that the World Bank put in place a process that would ensure review of projects by qualified international personnel with no conflicts of interest. An international “peer review” system would be such a mechanism.



- 2. The World Bank itself lacks qualified heritage experts among its own permanent staff. This is especially significant in the domain of archaeology as most projects proposed by Borrowers will have an impact on the archaeological heritage.**

The World Bank should proceed to rectify this omission by permanently appointing qualified heritage and archaeological experts to its staff. They should assist in setting policies and ensuring appropriate oversight of projects on the “peer review” model.

- 3. Above all, there is no recognition in the draft Review that cultural heritage belongs to all of us. We share a common biological and cultural inheritance. The human past is universal and we are its inheritors. It follows that protection of cultural heritage is the concern of all.**

Certainly, nation states have the primary responsibility for establishing and administering cultural heritage safeguards within their own territory. Local communities rightly have an important custodial responsibility for their cultural heritage. But the rest of humankind also has an interest here to ensure that cultural heritage is maintained for the benefit of all, in the present and in the future.

Specific comments follow concerning particular sections of the draft Review and Update.

Preamble. A Vision for Sustainable Development

The Vision is silent on the importance of cultural heritage. Cultural heritage enriches those directly affected by Sustainable Development, and us all. Properly conserved and presented, the visible cultural heritage can have beneficial economic impacts.

ESS1

There is no mention of cultural heritage as such.

ESSI.24

The stipulations mentioned here do not take into account the perception of the significance of cultural heritage in the Borrower’s country. Often, even when a strong legal framework of protection exists, those charged with upholding the law have little standing within their respective governments. This reinforces the need for international standards and oversight.

ESS8.4

The definition used here is narrow and ignores the dimension of the human past. Human cultural heritage has a time depth of over 2,000,000 years. That vast accumulation of cultural experience resonates powerfully in the present and needs to be preserved for the benefit of future generations. The definition should include reference to entire landscapes as representing aspects of cultural heritage. Evidence for past human activity is



omnipresent across the landscape.

ESS8.10

The expectation should be that nearly all projects would have an impact on cultural heritage, as discussed in ESS8.4. It follows that the professionals to be retained should be more than just competent, but have appropriate formal credentials and experience. Here adherence to international norms is crucial, as is oversight by to-be-hired credentialed World Bank personnel.

ESS8.13

The reference here to “international cultural heritage organizations” is to be welcomed.

ESS8.17

The definition here of archaeological sites and the reference to “ecological elements” lacks clarity. There is an assumption that archaeological “sites” have specific limits and that between them there is a void. In reality, archaeological remains are spread across entire landscapes, with concentrations in specific places.

ESS8.18

Surface surveys should always be conducted, even when there is no prior evidence of human habitation. And they need to be carried out to international standards, that is with a level of intensity designed to identify most traces of past human activity. Only then can a judgment be made about the potential significance of the remains identified and the methods appropriate for their study and conservation.

ESS8.19

“The Borrower will determine...” This statement represents a conflict of interest. Where the desire of the Borrower to expedite a project is opposed by the need to conserve cultural heritage, the latter will often be damaged or otherwise given short shrift. Here the need to adhere to international standards and for external oversight is essential.

The Archaeological Institute of America is ready to assist the World Bank as it continues to refine the draft Review and Update.

Yours truly,

Dr. Andrew M.T. Moore
President
Archaeological Institute of America