ICOMOS ICAHM

International Committee on Archaeological Heritage Management

International Council on Monuments and Sites

INTERNATIONAL COMMITTEE ON ARCHAEOLOGICAL HERITAGE MANAGEMENT (ICAHM)

COMPLYING WITH AND FURTHERING THE OBJECTIVES OF THE WORLD HERITAGE CONVENTION

In Regard to World Bank Document ESS8

18 FEBRUARY 2015

Introduction

These comments have been prompted by the announcement in 2014 that the World Bank is reviewing and updating its environmental and social safeguard policies, in particular the requirements for Borrowers relating to the identification and assessment of environmental and social risks and impacts associated with projects in which the Bank invests. Environmental and Social Standard 8, Cultural Heritage (ESS8) is of particular interest and concern to ICAHM.

We provide comments here that call upon the World Bank to provide adequate assistance to Borrowers that will engage in projects that might damage or destroy archaeological materials. At the same time, these comments are directed at Borrowers, who can refer to this document when planning for adequate safeguarding of the archaeological material that constitutes a national patrimony. We include protocols to be followed for necessary researches, and also the necessary credentials for those who will conduct research.

Background

The CONVENTION CONCERNING THE PROTECTION OF THE WORLD CULTURAL AND NATURAL HERITAGE was adopted by the UNESCO General Conference at its seventeenth session in Paris, 16 November 1972. According to Article 3 of the Convention (also known as The World Heritage Convention), “It is for each State Party to this Convention to identify and delineate the different properties situated on its territory mentioned in Articles 1 and 2 above.” Article 1 defines cultural heritage and Article 2 defines natural heritage.

Article 6 of the Convention states:

1. Whilst fully respecting the sovereignty of the States on whose territory the cultural and natural heritage mentioned in Articles 1 and 2 is situated, and without prejudice to property right provided by national legislation, the States Parties to this Convention recognize that such heritage constitutes a world heritage for whose protection it is the duty of the international community as a whole to co-operate.
2. The States Parties undertake, in accordance with the provisions of this Convention, to give their help in the identification, protection, conservation and presentation of the cultural and natural heritage referred to in paragraphs 2 and 4 of Article 11 if the States on whose territory it is situated so request.
3. Each State Party to this Convention undertakes not to take any deliberate measures which might damage directly or indirectly the cultural and natural heritage referred to in Articles 1 and 2 situated on the territory of other States Parties to this Convention.
It is, therefore, the position of The ICOMOS International Scientific Committee on Archaeological Heritage Management (ICAHM) that it is incumbent upon all parties engaged in development projects--including lending institutions such as the World Bank, the governments of countries in which development projects are to be conducted, and planning, design, and construction firms--to comply with Articles 3 and 6 of the World Heritage Convention.

Further, each development project provides an opportunity to further the objectives of Article 5 of the World Heritage Convention, as follows:

To ensure that effective and active measures are taken for the protection, conservation and presentation of the cultural and natural heritage situated on its territory, each State Party to this Convention shall endeavor, in so far as possible, and as appropriate for each country:

(a) to adopt a general policy which aims to give the cultural and natural heritage a function in the life of the community and to integrate the protection of that heritage into comprehensive planning programmes;
(b) to set up within its territories, where such services do not exist, one or more services for the protection, conservation and presentation of the cultural and natural heritage with an appropriate staff and possessing the means to discharge their functions;
(c) to develop scientific and technical studies and research and to work out such operating methods as will make the State capable of counteracting the dangers that threaten its cultural or natural heritage;
(d) to take the appropriate legal, scientific, technical, administrative and financial measures necessary for the identification, protection, conservation, presentation and rehabilitation of this heritage; and
(e) to foster the establishment or development of national or regional centres for training in the protection, conservation and presentation of the cultural and natural heritage and to encourage scientific research in this field.

ICAHM Comments and Opinion
Tangible cultural resources are an irreplaceable store of scientific and historical data, the value of which can only be preserved if they are left intact and in context. All tangible cultural resources are not of equal importance; therefore, after a thorough inventory of tangible cultural resources has been conducted and this inventory has been carefully

documented, tangible cultural resources should be evaluated in terms of their potential for inscription on the World Heritage List and on registers or gazetteers kept by regional or national cultural management and preservation organizations.

Minimal protocols for archaeological investigation prior to project initiation.

For all projects, the following should be conducted:

1. Background research: This must include a review of all documents relevant to archaeological resources that might be located in the project area, and interviews with subject matter experts and other groups and individual with a legitimate interest in the material culture, including archaeological resources that might be affected by the proposed project.

2. Inventory: Inventory must be conducted by
a.) Examination and analysis of existing aerial and satellite imagery and the acquisition of other such inventory that might assist in the inventory of archaeological resources and the later evaluation of the significance of these resources.
b.) Examination of the ground surface by pedestrian survey.
c.) Sub-surface sampling of areas where the ground surface is obscured by vegetation. This might include the use of geophysical prospection technologies, such as ground penetrating radar (GPR) or magnetometry.
The above must be conducted in compliance with internationally accepted protocols for such investigations. Among these protocols are found standards for documentation of fieldwork and findings, including cataloging and curation of artifacts, documentation of immovable features, in situ preservation of immovable features, preservation of artifacts that are collected during fieldwork, and reporting standards.

3. Evaluation: Archaeological resources found during inventory must be evaluated in terms of their potential for inscription on the World Heritage List and on registers or gazetteers kept by regional or national cultural management and preservation organizations.

4. Mitigation: Any possible damage to archaeological resources that are found to be eligible or potentially eligible for inscription on the World Heritage List and on registers or gazetteers kept by regional or national cultural management and preservation organizations must be mitigated by either redesign of the project in ways that prevent such damage, or by complete documentation, which will include comprehensive excavation, of any resource where such redesign is not possible.

Quality Assurance
Professional Qualifications
The research protocols described above must be carried out by professional archaeologists.

The minimum professional qualifications in archeology are a graduate degree in archeology, anthropology, or closely related field plus:

- At least one year of full-time professional experience or equivalent specialized training in archeological research, administration or management;
- At least four months of supervised field and analytic experience in general archeology, and
- Demonstrated ability to carry research to completion.

In addition to these minimum qualifications, a professional in prehistoric archeology shall have at least one year of full-time professional experience at a supervisory level in the study of archeological resources of the prehistoric period. A professional in historic archeology shall have at least one year of full-time professional experience at a supervisory level in the study of archeological resources of the historic period.

Standards for Archeological Documentation

Archeological documentation is a series of actions applied to properties of archeological interest. Documentation of such properties may occur at any or all levels of planning, identification, evaluation or treatment. The nature and level of documentation is dictated by each specific set of circumstances. Archeological documentation consists of activities such as archival research, observation and recording of above-ground remains, and observation (directly, through excavation, or indirectly, through remote sensing) of below-ground remains. Archeological documentation is employed for the purpose of gathering information on individual historic properties or groups of properties. It is guided by a framework of objectives and methods derived from the planning process, and makes use of previous planning decisions, such as those on evaluation of significance. Archeological documentation may be undertaken as an aid to various treatment activities, including research, interpretation, reconstruction, stabilization and data recovery when mitigating archeological losses resulting from construction. Care should be taken to assure that documentation efforts do not duplicate previous efforts.

Standard I. Archeological Documentation Activities Follow an Explicit Statement of Objectives and Methods That Responds to Needs Identified in the Planning Process

Archeological research and documentation may be undertaken to fulfill a number of needs, such as overviews and background studies for planning interpretation or data recovery to mitigate adverse effects. The planning needs are articulated in a statement of objectives to be accomplished by the archeological documentation activities. The statement of objectives guides the selection of methods and techniques of study and provides a comparative framework for evaluating and deciding the relative efficiency of alternatives. Satisfactory documentation involves the use of archeological and historical sources, as well as those of other disciplines. The statement of objectives usually takes the form of a formal and explicit research design which has evolved from the interrelation of planning needs, current knowledge, resource value and logistics.

Standard II. The Methods and Techniques of Archeological Documentation are Selected To Obtain the Information Required by the Statement of Objectives

The methods and techniques chosen for archeological documentation should be the most effective, least destructive, most efficient and economical means of obtaining the needed information. Methods and techniques should be selected so that the results may be verified if necessary. Non-destructive techniques should be used whenever appropriate. The focus on stated objectives should be maintained throughout the process of study and documentation.

Standard III. The Results of Archeological Documentation are Assessed Against the Statement of Objectives and Integrated into the Planning Process

One product of archeological documentation is the recovered data; another is the information gathered about the usefulness of the statement of objectives itself. The recovered data are assessed against the objectives to determine how they meet the specified planning needs. Information related to archeological site types, distribution and density should be integrated in planning at the level of identification and evaluation. Information and data concerning intra-site structure may be needed for developing mitigation strategies and are appropriately integrated at this level of planning. The results of the data analyses are integrated into the body of current knowledge. The utility of the method of approach and the particular techniques which were used in the investigation (i.e., the research design) should be assessed so that the objectives of future documentation efforts may be modified accordingly.

Standard IV. The Results of Archeological Documentation are Reported and Made Available to the Public

Results must be accessible to a broad range of users including appropriate agencies, the professional community and the general public. Results should be communicated in reports that summarize the objectives, methods, techniques and results of the documentation activity, and identify the repository of the materials and information so that additional detailed information can be obtained, if necessary. The public may also benefit from the knowledge obtained from archeological documentation through pamphlets, brochures, leaflets, displays and exhibits, or by slide, film or multimedia productions. The goal of disseminating information must be balanced, however, with the need to protect sensitive information whose disclosure might result in damage to properties. Curation arrangements sufficient to preserve artifacts, specimens and records generated by the investigation must be provided for to assure the availability of these materials for future use.

Archeological Documentation Objectives

The term "archeological documentation" is used here to refer specifically to any operation that is performed using archeological techniques as a means to obtain and record evidence about past human activity that is of importance to documenting history and prehistory. Historic and prehistoric properties may be important for the data they contain, or because of their association with important persons, events, or processes, or because they represent architectural or artistic values, or for other reasons. Archeological documentation may be an appropriate option for application not only to archeological properties, but to aboveground

structures as well, and may be used in collaboration with a wide range of other treatment activities.

If a property contains artifacts, features, and other materials that can be studied using archeological techniques, then archeological documentation may be selected to achieve particular goals of the planning process, such as to address a specified information need, or to illustrate significant associative values. Within the overall goals and priorities established by the planning process, particular methods of investigation are chosen that best suit the types of study to be performed.

Relationship of archeological documentation to other types of documentation or other treatments: Archeological documentation is appropriate for achieving any of various goals, including:

Documentation Plan

Research Design: Archeological documentation can be carried out only after defining explicit goals and a methodology for reaching them. The goals of the documentation effort directly reflect the goals of the preservation plan and the specific needs identified for the relevant historic contexts. In the case of problem oriented archeological research, the plan usually takes the form of a formal research design, and includes, in addition to the items below, explicit statements of the problem to be addressed and the methods or tests to be applied. The purpose of the statement of objectives is to explain the rationale behind the documentation effort; to define the scope of the investigation; to identify the methods, techniques, and procedures to be used; to provide a schedule for the activities; and to permit comparison of the proposed research with the results. The research design for an archeological documentation effort follows the same guidelines as those for identification (see the Guidelines for Identification) but has a more property-specific orientation.

The research design should draw upon the preservation plan to identify:

Evaluated significance of the property(ies) to be studied;
Research problems or other issues relevant to the significance of the property,
Prior research on the topic and property type; and how the proposed documentation objectives are related to previous research and existing knowledge;
The amount and kinds of information (data) required to address the documentation objectives and to make reliable statements including at what point information is redundant and documentation efforts have reached a point of diminishing returns;
Methods to be used to find the information; and
Relationship of the proposed archeological investigation to anticipated historical or structural documentation, or other treatments.
The primary focus of archeological documentation is on the data classes that are required to address the specified documentation objectives. This may mean that other data classes are deliberately neglected. If so, the reasons for such a decision should be carefully justified in terms of the preservation plan.

Archeological investigations seldom are able to collect and record all possible data. It is essential to determine the point at which further data recovery and documentation fail to improve the usefulness of the archeological information being recovered. One purpose of the research design is to estimate those limits in advance and to suggest at what point information becomes duplicative. Investigation strategies should be selected based on these general principles, considering the following factors:

Specific data needs;
Time and funds available to secure the data; and
Relative cost efficiency of various strategies.
Responsiveness to the concerns of local groups (e.g., Native American groups with ties to specific properties) that was built into survey and evaluation phases of the preservation plan, should be maintained in archeological investigation, since such activity usually involve, site disturbance. The research design, in addition to providing for appropriate ethnographic research and consultation, should consider concerns voiced in previous phases. In the absence of previous efforts to coordinate with local or other interested groups, the research design should anticipate the need to initiate appropriate contracts and provide a mechanism for responding to sensitive issues, such as the possible uncovering of human remains or discovery of sacred areas.

The research design facilitates an orderly, goal directed and economical project. However, the research design must be flexible enough to allow for examination of unanticipated but important research opportunities that arise during the investigation.

Documentation Methods

Backgound Review: Archeological documentation usually is preceded by, or integrated with historical research (i.e. that intensive background information gathering including identification of previous archeological work and inspection of museum collections; gathering relevant data on geology, botany, urban geography and other related disciplines; archival research; informant interviews, or recording of oral tradition, etc.).

Depending on the goals of the archeological documentation, the background historical and archeological research may exceed the level of research accomplished for development of the relevant historic contexts or for identification and evaluation, and focuses on the unique aspects of the property to be treated. This assists in directing the investigation and locates a broader base of information than that contained in the property itself for response to the documentation goals. This activity is particularly important for historic archeological properties where information sources other than the property itself may be critical to preserving the significant aspects of the property.

Field Studies: The implementation of the research design in the field must be flexible enough to accommodate the discovery of new or unexpected data classes or properties, or changing field conditions. A phased approach may be appropriated when dealing with large complex properties or groups of properties, allowing for changes in emphasis or field strategy, or termination of the program, based on analysis of recovered data at the end of each phase. Such an approach permits the confirmation of assumptions concerning property extent,

content or organization which had been made based on data gathered from identification and evaluation efforts, or the adjustment of those expectations and resulting changes in procedure. In some cases a phased approach may be necessary to gather sufficient data to calculate the necessary sample size for a statistically valid sample. A phased documentation program may often be most cost-effective, in allowing for early termination of work if the desired objectives cannot be achieved.

Explicit descriptive statements of and justification for field study techniques are important to provide a means of evaluating results. In some cases, especially those employing a sampling strategy in earlier phases (such as identification or evaluation), it is possible to estimate parameters of certain classes of data in a fairly rigorous statistical manner. It is thus desirable to maintain some consistency in choice of sampling designs throughout multiple phases of work at the same property. Consistency with previously employed area sampling frameworks also improves potential replication in terms of later locating sampled and unsampled areas. It often is desirable to estimate the nature and frequency of data parameters based on existing information or analogy to other similar cases. These estimates may then be tested in field studies.

An important consideration in choosing methods to be used in the field studies should be assuring full, clear, and accurate descriptions of all field operations and observations, including excavation and recording techniques and stratigraphic or inter-site relationships.

To the extent feasible, chosen methodologies and techniques should take into account the possibility that future researchers will need to use the recovered data to address problems not recognized at the time the data were recovered. The field operation may recover data that may not be fully analyzed; this data, as well as the data analyzed, should be recorded and preserved in a way to facilitate future research.

A variety of methodologies may be used. Choices must be explained, including a measure of cost-effectiveness relative to other potential choices. Actual results can then be measured against expectations, and the information applied later in similar cases.

Destructive methods should not be applied to portions or elements of the property if nondestructive methods are practical. If portions or elements of the property being documented are to be preserved in place, the archeological investigation should employ methods that will leave the property as undisturbed as possible. However, in cases where the property will be destroyed by, for example, construction following the investigation, it may be most practical to gather the needed data in the most direct manner, even though that may involve use of destructive techniques.

Logistics in the field, including the deployment of personnel and materials and the execution of sampling strategies, should consider site significant, anticipated location of most important data, cost effectiveness, potential time limitations and possible adverse environmental conditions.

The choice of methods for recording data gathered in the field should be based on the research design. Based on that statement, it is known in advance of field work what kinds of

information are needed for analysis; record-keeping techniques should focus on these data. Field records should be maintained in a manner that permits independent interpretation in so far as possible. Record-keeping should be standardized in format and level of detail.

Archeological documentation should be conducted under the supervision of qualified professionals in the disciplines appropriate to the data that are to be recovered. When the general public is directly involved in archeological documentation activities, provision should be made for training and supervision by qualified professionals. (See the Professional Qualifications Standards.)

Analysis: Archeological documentation is not completed with field work; analysis of the collected information is an integral part of the documentation activity, and should be planned for in the research design. Analytical techniques should be selected that are relevant to the objectives of the investigation. Forms of analysis that may be appropriate, depending on the type of data recovered and the objectives of the investigation, include but are not limited to: studying artifact types and distribution; radiometric and other means of age determination; studies of soil stratigraphy, studies of organic matter such as human remains, pollen, animal bones, shells and seeds; study of the composition of soils and study of the natural environment in which the property appears.

Reporting Results

Report Contents: Archeological documentation concludes with written report(s) including minimally the following topics:

Description of the study area;
Relevant historical documentation/background research;
The research design;
The field studies as actually implemented, including any deviation from the research design and the reason for the changes;
All field observations;
Analyses and results, illustrated as appropriate with tables, charts, and graphs;
Evaluation of the investigation in terms of the goals and objectives of the investigation, including discussion of how well the needs dictated by the planning process were served;
Recommendations for updating the relevant historic contexts and planning goals and priorities, and generation of new or revised information needs;
Reference to related on-going or proposed treatment activities, such as structural documentation, stabilization, etc.; and
Information on the location of original data in the form of field notes, photographs, and other materials.
Some individual property information, such as specific locational data, may be highly sensitive to disclosure, because of the threat of vandalism. If the objectives of the documentation effort are such that a report containing confidential information such as specific site locations or information on religious practices is necessary, it may be appropriate to prepare a separate report for public distribution. The additional report should summarize that information that is not under restricted access in a format most useful to the

expected groups of potential users. Peer review of draft reports is recommended to ensure that state-of-the-art technical reports are produced.

Availability: Results must be made available to the full range of potential users.

Curation

Archeological specimens and records are part of the documentary record of an archeological site. They must be curated for future use in research, interpretation, preservation, and resource management activities. Curation of important archeological specimens and records should be provided for in the development of any archeological program or project.

Archeological specimens and records that should be curated are those that embody the information important to history and prehistory. They include artifacts and their associated documents, photographs, maps, and field notes; materials of an environmental nature such as bones, shells, soil and sediment samples, wood, seeds, pollen, and their associated records; and the products and associated records of laboratory procedures such as thin sections, and sediment fractions that result from the analysis of archeological data.

Satisfactory curation occurs when:

Curation facilities have adequate space, facilities, professional personnel,
Archeological specimens are maintained so that their information values are not lost through deterioration, and records are maintained to a professional archival standard;
Curated collections are accessible to qualified researchers within a reasonable time of having been requested; and
Collections are available for interpretive purposes, subject to reasonable security precautions.
- Respect of recognized standards: The projects must be conducted in compliance with internationally accepted protocols for such investigations. Among these protocols are found standards for documentation of fieldwork and findings, including cataloging and curation of artifacts, documentation of immovable features, in situ preservation of immovable features, preservation and archiving of artifacts that are collected during fieldwork, and reporting standards including their archiving.

- Training: Only trained personnel is capable of ensuring the quality of an archaeological excavation, its documentation and the conservation of the finds and documents. If trained personnel are not available, then training should be organized so that the personnel can do the work on and out of the site adequately.
- Financing: adequate financing ensures quality also. Therefore a budget including all phases of the cycle should be presented, discussed and accepted before inventory, surveying or excavation. This should be part of the “Cultural Heritage Management Plan”.

1. Stakeholder Consultation is in general beneficial and should be considered, in particular for planning, disclosure of information, consultation and participation, grievance acceptance and response, and ongoing reporting to project-affected communities.

2. Guidance throughout the whole archaeological process may be necessary and can be done in the form of expert support (technical assistance – knowledge sharing) which could be called in if needed for the identification, protection and management of archaeological heritage.
3. Monitoring of the enforcement of the recognized standards and of the archaeological cycle during projects implying archaeological heritage is essential. This is certainly to be carried out by external experts.