

IPPA

THE INDO-PACIFIC PREHISTORY ASSOCIATION

20 February 2015

ATSIS Unit
The University of Queensland
Brisbane 4072
Australia

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

Dear Chair and Board Members

I am writing on behalf of the Indo-Pacific Prehistory Association (IPPA). The Association's antecedent was founded in 1929 and IPPA now has some 600 members around the world. It promotes cooperation in the study of the prehistory of Asia east of 70° longitude and of the wider Pacific region, and upholds ethical standards in archaeological research and cultural heritage management.

The Association is pleased that the Bank is undertaking the Review and Update of Safeguard Policies, strongly supports the importance accorded to cultural heritage and appreciates the chance to submit the following comments.

IPPA has two overarching central concerns:

1. the absence of permanent fulltime senior cultural heritage expertise and particularly archaeological heritage expertise across the World Bank Group.

2. the lack of clarity about appropriate third-party cultural heritage specialists

1. The ESS documentation makes continual reference to Bank reviews and assessments of project risks and impacts, the parameters of environmental and social assessments, the capacity of country systems, the recognition of third-party experts, etc. The Bank staff responsible for this crucial work are rarely specified, but Information Note 2 notes that "The review of the Borrower'[s] ES Framework will be carried out by the Bank project team's environment and social development specialist". IPPA is keenly aware that specialists such as these almost never have any cultural heritage and especially archaeological knowledge or experience. This has meant that cultural heritage and particularly archaeological heritage has often been badly neglected as the Bank rolls out projects on the ground. The Bank's cultural heritage consultants provide assistance, and the Bank's 2009 Physical Cultural Resources Safeguard Policy Guidebook is a worthwhile basic resource for its anticipated audience. Neither however substitute for permanent professionally-qualified in-



house heritage experts in advancing the application of the Bank's environmental and social standards.

On these grounds, IPPA strongly recommends that the World Bank appoints one or more permanent full-time senior archaeological heritage specialists to support the application of ESS 8 and related aspects of the Bank's other ESS portfolios.

2. The appropriate professional standard of third-party experts is not explicitly stated in ESS 8 or related cultural heritage provisions in other ESS portfolios. The terminology is left too vague and thus open to manipulation and abuse, referring simply to 'experts', 'relevant experts' or 'persons with relevant expertise'. The determination of who is expert in or relevant to specialist deliberations about cultural and especially archaeological heritage is a matter for the discipline(s) in question to determine in through open and transparent professional processes.

On that basis, IPPA strongly advises the World Bank to replace all mentions of 'expert' and 'expertise' in ESS 8 with the following terminology: *credentialed, accredited, and internationally recognized cultural heritage experts* (i.e. paragraphs 10, 14, 15, 19 & footnote 8)

In ESS 1, paragraphs 31, 49 & 53, the equivalent terminology should read *credentialed, accredited and internationally recognized independent experts* as these passages are not specific to cultural heritage

ESS 7, paragraphs 15 & 19, the equivalent terminology should read *credentialed, accredited and internationally recognized independent experts* as these passages are not specific to cultural heritage

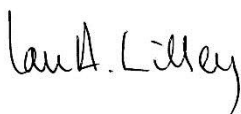
In addition, ESS 8 paragraph 19 concerning archaeology should be reworded as follows:

The Borrower will consult with national archaeological and cultural heritage agencies and credentialed, accredited and widely recognized national and international archaeological experts to determine if archaeological remains and artifacts discovered during the life of the project require: (a) documentation only; (b) detailed excavation, analysis and documentation; or (c) conservation in place; and will manage them accordingly. The Borrower will determine ownership and custodial responsibility for artifacts in accordance with national and subnational law, and will arrange for their identification and storage to enable future study, analysis and publication by experts.

IPPA also suggests that point c. in paragraph 13 should include *national and international professional scientific bodies and cultural heritage organizations.*

Please let me know if IPPA can be of further assistance in this matter.

Yours faithfully



Professor Ian Lilley FSA FAHA
Secretary-General