



Society of Africanist Archaeologists

1 March, 2015

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 write as President of the Society of Africanist Archaeologists (SAfA), a professional organisation with approximately 450 members, made up of archaeologists working across Africa and based both within and beyond the continent. SAfA has significant interest in World Bank-assisted activities in Africa, particularly in terms of their heritage and cultural impacts and especially given the relative lack of resources available to heritage managers in many African states.

The Society is pleased to have the opportunity to comment on the Review and Update of the World Bank Safeguard Policies, and especially upon those policies that concern cultural heritage and indigenous peoples. In general, we believe that the update provides significant support for the issues of most concern to SAfA, but we do have recommendations that the Society believes would improve World Bank oversight of cultural heritage issues. These pertain primarily to Environmental and Social Standard (ESS) 8 – Cultural Heritage, as well as to ESS 7 – Indigenous Peoples.

1. The ESS documentation makes frequent reference to the role that World Bank specialists will play in impact and risk assessment for particular projects, in assessment of national capabilities for participation and oversight in those projects, in evaluation of mitigation efforts, and in a variety of equally significant activities. As paragraph 37 of Information Note 2 (Use and Strengthening of Borrower's Environmental and Social Framework) states, "The review of the Borrower[s] ES Framework will be carried out by the Bank project team's environment and social development specialist". Unfortunately, at this point the World Bank Group lacks permanent, senior, full-time specialists with cultural heritage expertise, and especially archaeological heritage expertise. This lack of in-house oversight and expertise has in the past led to significant negative impacts on a number of World Bank-assisted projects in Africa.

Therefore, the Society of Africanist Archaeologists 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. ESS documentation, especially in ESS 8, relies upon consultation with 'experts' and 'persons with relevant expertise' in identifying, assessing the significance of and evaluating impacts upon cultural heritage. This terminology is very vague and is open to manipulation and abuse, particularly in countries (in Africa and elsewhere) where cultural heritage management systems are undeveloped and/or under-resourced. Under these circumstances, expertise relevant to cultural and especially archaeological heritage resource management needs to be recognised and credentialed by the relevant professional organisations of the disciplines in question.

Therefore, the Society of Africanist Archaeologists strongly recommends that the existing terminology of 'experts' and 'persons with relevant expertise' be replaced with 'credentialed and international recognised cultural heritage experts' throughout ESS 8.

3. As noted above, throughout much of Africa (and elsewhere), cultural heritage management systems are significantly undeveloped and/or under-resourced. Under these circumstances, the World Bank Group and Borrowers may be caught in a double bind as they implement ESS 8: effective protection and management of cultural and archaeological heritage requires input from credentialed and international recognised cultural heritage experts, but this can in turn limit the participation of personnel from the applicant countries themselves. This challenge can only be addressed by initiatives to strengthen cultural heritage management systems in countries where World Bank-assisted projects are undertaken. These initiatives should include a fund to be used for training cultural heritage specialists from applicant countries, as well as facilitating training opportunities for such specialists in the USA or in other countries with relevant foreign assistance programmes.

Therefore, the Society of Africanist Archaeologists strongly recommends that the World Bank establish and maintain a Cultural Heritage Preservation Fund for the purpose of creating in-country cultural heritage management systems that are adequate to implement the requirements of ESS 8.

4. In ESS 7 – Indigenous Peoples, significant and welcome attention is paid to the challenge of ensuring that World Bank-assisted projects provide opportunities for participation by indigenous communities in ways that enhance, rather than threaten, their cultural and social identities and well-being. The Society of Africanist Archaeologists fully supports the initiatives described in ESS 7, and particularly the description of 'Indigenous Peoples' used in paragraph 6 of ESS 7. The Society would like to emphasise that in Africa many communities recognised as 'Indigenous Peoples' under the terms of paragraph 6 of ESS 7 may not be recognised as 'indigenous' under the definitions used by the Indigenous Peoples of Africa Coordinating Committee, even though those African communities exist in similar conditions

of marginalisation to mainstream social and political systems and in similar states of cultural and economic precarity.

Therefore, the Society of Africanist Archaeologists strongly welcomes the inclusive description of 'Indigenous People' used in paragraph 6 of ESS 7, and expects that that description will guide policies toward such communities on World Bank-assisted projects in Africa and elsewhere.

Thank you again for allowing the Society of Africanist Archaeologists to comment on this Review and Update of World Bank Safeguard Policies. Please do not hesitate to contact me if I can be of further assistance regarding this submission

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Scott MacEachern', with a long horizontal flourish extending to the right.

Scott MacEachern
President, Society of Africanist Archaeologists

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