

# TÜMAD

MADENCİLİK SANAYİ VE TİCARET A.Ş.



## CULTURAL HERITAGE MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS

by TÜMAD Madencilik San. ve Tic. AŞ

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## CULTURAL HERITAGE MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS

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## APPENDICES

### APPENDIX 1 – OFFICIAL LETTERS

## ABBREVIATIONS AND DEFINITIONS

Project(s)	: Lapseki and İvrindi Gold and Silver Mine and Processing Projects
TÜMAD	: TÜMAD Madencilik San. ve Tic. A.Ş.
EBRD	: European Bank for Reconstruction and Development
EIA	: Environmental Impact Assessment
ESMS	: Environmental and Social Management System
IMS	: Integrated Management System
KPI	: Key Performance Indicator
MoEU	: Ministry of Environment and Urbanization
PR(s)	: Performance Requirements

**Local People:** The oldest and original residents of a place.

**Culturally Important Site:** It is any place that is important to a community because it expresses the cultural or sacred identity and activities of that community and is a part of its actions.

**Cultural heritage:** A resource group that remains from the past and defines people as a reflection and expression of ever-changing values, beliefs, knowledge and traditions, regardless of ownership.

**Cultural assets:** All movable and immovable assets that are underground, over ground or under water which are related to science, culture, religion and fine arts belonging to prehistoric and historical periods or which have scientific value and cultural value that have been subject to social life in prehistoric or historical periods.

**Natural assets:** The values that belong to geological, prehistoric and historical periods and that are underground, over ground or under water and required to be protected due to being rare or their features and beauty.

**Protected areas:** The places that are the product of various civilizations from the beginning of history up to today, which are intensely occupied by the cities, city residues and cultural assets reflecting the social, economic, architectural etc. characteristics of the periods they have survived, which have been subject to social life or in which important historical events have occurred, requiring protection due to determined natural characteristics.

**Abstract Cultural Heritage:** Abstract cultural heritage is defined as applications, statements, information, skills (as well as associated instruments, objects, remains, and cultural areas) that are considered as a part of the cultural heritage of generations, groups and, in some cases, of the individuals.

**Concrete Cultural Heritage:** Concrete (physical) cultural heritage is defined as movable or immovable objects, fields, building groups and natural qualities and land objects that have archaeological, paleontological, historical, architectural, religious, aesthetic or other cultural features.

**CPCNA:** Code of Protection of Cultural and Natural Assets No. 2863

**EBRD:** European Bank for Reconstruction and Development

**Project(s):** Lapseki and İvrindi Golder and Silver Mine and Processing Projects

## 1 INTRODUCTION

TÜMAD Madencilik San. ve Tic. A.Ş. (TÜMAD) plans to establish the Lapseki Gold and Silver Mine and Processing Project (the Lapseki Project) within the administrative boundaries of the Şahinli and Kocabaşlar Villages of the Lapseki District in the Province of Çanakkale. The construction phase of the Lapseki Project has been at completion stage and the operation phase will start in October 2017.

TÜMAD plans to establish the İvrindi Gold and Silver Mine and Processing Project (the İvrindi Project) within the administrative boundaries of Değirmenbaşı and Küçükıllica Villages of the İvrindi District of Province of Balıkesir. The İvrindi Project have started with mobilization.

The project is seeking finance and this document is produced as a part of studies conducted to assess the Environmental and Social Impacts of the Project as per the EBRD Performance Requirements (PRs).

This Document is the Cultural Heritage Management Plan that is prepared for TÜMAD Operations. The Integrated Management System document registration number for Cultural Heritage Management Plan is TMD\_KTİ\_PRD.004. This management plan sets the requirements for the operation phase of the Lapseki Project and for construction and operation phase of the İvrindi Project and is an integral part of the Environmental and Social Management System (ESMS) implemented by TÜMAD for the two mine projects.

This Management Plan is based on the Project(s) Environmental & Social Management System Framework (TMD\_EYS\_PLN.004) of TÜMAD, which is owned by the TÜMAD General Manager. Any subsequent changes to the TÜMAD ESMS may result in the changes to this document.

This Management Plan will be reviewed on a minimum of a six monthly basis during construction and commissioning. During operation phase, this Plan will be reviewed on an annual basis to determine whether any changes or updates are required to the Management Framework unless a more frequent update is required to reflect changing project design or ESMS requirements and procedures.

Any requests for changes to this Management Plan must be addressed to the owner of this Management Plan and will be subject to appropriate review and approval processes as outlined in the Management of Change Procedure (TMD\_EYS\_PRD.010).

## 2 PURPOSE

The purpose of this plan is to,

- Sufficiently preserve the cultural and natural assets' heritage posing importance for the local, regional, country and world communities in case that any processing facilities of TÜMAD finds them in their own area of activity and encounters them during operations;
- Minimizing or mitigating the direct or indirect effects of the activities of TÜMAD on cultural heritage;
- Ensuring that the sites not inherited but pose importance for the local people in terms of beliefs, traditions and customs in cultural or sacred sense are respected and real or probable harm that employees and subcontractors can incur to these sites are reduced or prevented based on the cultural norms of the relevant parties;
- Defining the scope of the Management Plan and exhibiting the applicable short and long-term management strategies. Establishing effective plans and procedures in relation to the management of archaeological sites and cultural assets in the Project area, including possible accidental findings during construction and operation;
- Defining the authorities and responsibilities;
- Explaining the applicable Project Standards regarding the Management Plan;
- Defining the Project commitments, operation procedures and guidance regarding the Management Plan;
- Defining monitoring and reporting procedures including the Key Performance Indicators;
- Defining the training requirements;
- Exhibiting the references for supporting materials and information.

These objectives shall be achieved through the implementation of this Management Plan and shall be measured and assessed on the main performance indicators identified in this plan.

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### 3 SCOPE

Covers all the areas of activity conducted in all enterprises of TÜMAD including contractors and subcontractors throughout the lifecycles of the Lapseki and İvrindi Gold Mine Projects. Specifically it will incorporate pre-construction activities, construction, operation, decommissioning and closure.

Types of Cultural Heritage Covered by this Plan:

#### Intangible Cultural Heritage

Intangible cultural heritage means the practices, representations, expressions, knowledge, skills – as well as the instruments, objects, artefacts and cultural spaces associated therewith – that communities, groups and, in some cases, individuals recognise as part of their cultural heritage and which are transmitted from generation to generation

#### Tangible Cultural Heritage

Tangible (physical) cultural heritage concerns movable or immovable objects, sites, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic or other cultural significance

#### 3.1 Overlaps with Other Management Plans

This Management Plan is part of the overall suite of Management Plans developed for the TÜMAD Project and as part of ESMS overlaps with the following management plans which have cultural heritage implications, including:

- Livelihood Restoration Frameworks (TMD\_IVR\_KTI\_PLN.002 & TMD\_LAP\_KTI\_PLN.001) and the Stakeholder Engagement Plan (TMD\_EYS\_PLN.001), particularly in relation to community consultation requirements.
- Contractor Management Plan (TMD\_ISG\_PLN.003), particularly in relation to contractor cultural heritage management plan requirements.

### 4 PROJECT STANDARDS

#### 4.1 Applicable Turkish National Standards

Code of Protection of Cultural and Natural Assets (CPCNA Law No: 2863),

The purpose of this law is to determine the definitions of movable and immovable cultural and natural assets that need to be protected; to determine the procedures and activities to be carried out and to specify the formation and duties of the organizations that shall implement the necessary principles and relevant decisions.

CPCNA **Article 3** includes the following definitions:

- Cultural assets are movable and immovable assets that relate to science, culture, religion and fine arts, which are located on the ground, underground, or under water, inherited from prehistoric or historical periods.
- Natural assets are movable and immovable assets that are located on the ground, underground, or under water, inherited from prehistoric or historical periods, which are protected due to their rarity, characteristics or value.

**Article 4 of the Law** includes the responsibility to notify. It is obligatory to inform the Directorate of Museums, Mukhtar or local authorities about the movable and immovable cultural and natural properties discovered within 3 days following this discovery. The mukhtar shall notify the closest local authority within 24 hours following the notice. The local authorities shall inform the Ministry of Culture and Tourism (MCT) and the nearest Museum Directorate within 10 days following the official application. MCT General Directorate of Cultural Heritage and Museums and the Regional Board Directorate of Cultural Assets Protection (RBDCHP) are responsible for the registration of this discovery.

**Article 5 of the Law** specifies that cultural and natural assets shall be considered as the property of the state.

**Article 6 of the Law** defines the immovable cultural and natural assets and presents a detailed list in that regard.

**Article 7 of the Law** notes that the relevant RBDCHP is responsible from recording the cultural heritage commodities.

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**Article 8 of the Law** specifies the decisions to be taken regarding the protection areas of cultural assets. According to this article, RBDCHPs have the authority to make decisions about the protection areas of cultural assets and take decisions about the construction and facilities to be built in protected areas.

**Article 9 of the Law** stipulates that construction or physical intervention on immovable cultural assets is prohibited unless permission is obtained from RBDCHP. Renovation, construction, drilling, partial or mass destruction and excavations are considered physical interventions.

Aforementioned articles of the CPCNA presents a general framework for the possible archaeological sites within TÜMAD property. The regulations including the details regarding the Law shall be approached with the relevant decisions made by the High Council of Preservation of Cultural Assets.

#### **4.2 Turkish EIA requirements**

The EIA Reports to be submitted for the projects should include the opinions from the Ministry of Culture and Tourism and Regional Boards of Preservation of Cultural Assets in that there are not any immovable cultural assets, protected areas, urban or archaeological sites previously registered in licensed areas required to be protected.

Opinions obtained from the relevant authorities for both Lapseki and İvrindi Projects are given in Appendix 1.

#### **4.3 Other Commitments to and Requirements of Turkish Government Authorities**

Not Applicable.

#### **4.4 Applicable International Standards and Guidelines**

The international standards to be implemented by TÜMAD are the standards specified by European Bank for Reconstruction and Development (EBRD).

EBRD Performance Requirement 8 - Cultural Heritages defines the requirements regarding Cultural Heritages. TÜMAD shall conform to the requirements of EBRD Performance Requirement 8 while implementing its policies.

Basic requirements are as follows;

- Identification and assessment of the risks related to cultural heritage within the Project area and possible effects during the project design, construction, operation and closure phases and identifying the preventive measures and plans to be taken to deal with the identified risks and effects in a proper manner. These measures shall prefer preventing the risks and impacts or minimizing or mitigating them. The EBRD recognises that both “tangible and intangible cultural heritage are important assets for economic and social development, and are integral part of the continuity of cultural identity and practice”. EBRD policy also addresses chance finds. It is required that the Project should have in place a way of managing chance finds. That is physical cultural heritage encountered unexpectedly during project implementation.
- Ensuring that affected communities and relevant government agencies understand these risks and potential impacts, as well as preventive and mitigation measures by disclosing related project information if the project or project phase has a significant risk or potential adverse impact on the cultural heritage.

#### **4.5 Applicable TÜMAD Standards, Policies and Procedures**

TÜMAD has committed to protect all the cultural and social heritage and all sites and resources that are sacred to the local people in case of discovery.

Incidental Finding Procedure for Cultural and Natural Assets (TMD\_KTİ\_PRD.004)

#### **Protection of Standard Site Cultural Heritage and Its Preservation in a Good Condition**

The facilities should develop and preserve a plan covering the following constituents:

- The procedures, objectives, targets and key responsibilities regarding the regulations that change the natural state of the soil.
- An inventory list of all sites, excluded zones and their locations. The list should be in line with the cultural norms of the parties involved. Confidentiality should be established where cultural norms require confidentiality.
- A contact list concerning the sites with special importance. As noted above, this list should be in line with the cultural norms of the parties involved.



- Records of unauthorized arrangements that alter the natural state of the site and related researches.
- The purposes for a management procedure to include the documented operations are as follows:
  - The enterprise determining and evaluating the sites in line with the rights of the enterprise and possible effects.
  - Confidential protection of the relevant records in a cultural way.
  - Reviewing the site information in order to provide up-to-date and accurate information.
  - Relevant employees and subcontractors establishing connection with the site locations with appropriate protocols.
  - Training and raising awareness regarding what employees and subcontractors shall do when they find any handmade material during their work and the procedures (TMD\_KTİ\_PRD.004).
  - Incident report and investigation
  - Penalties for violating the laws.
  - Emergency intervention and quick intervention to the site in a cultural and sacred sense.

## 5 ROLES AND RESPONSIBILITIES

**Table 1: Roles and Responsibilities**

ROLE	RESPONSIBILITY
<b>General Manager</b>	<ul style="list-style-type: none"> <li>Assist the Community Relations Department/Business Manager to get information about the important sites and putting them in order, and disclosing this information to related employees and subcontractors.</li> </ul>
<b>Community Relations Department Manager / Enterprise Director</b>	<ul style="list-style-type: none"> <li>Ensure that all interested parties have information about the important sites and that appropriate information is collected, recorded and disclosed to the relevant employees and subcontractors.</li> <li>Monitoring and management of the legal and corporate procedure in the event of encountering a cultural and natural asset during the work</li> <li>Ensure that the operations do not damage the cultural heritage areas without appropriate approvals.</li> <li>Review, report and follow-up the unauthorized construction area damages and procedure violations.</li> <li>Ensure that appropriate training and information is provided to site personnel working on projects that may destroy cultural heritage, so that they understand their cultural heritage responsibilities.</li> <li>Document management.</li> <li>Management of Law or Policy Changes</li> </ul>
<b>Community Relations Officer</b>	<ul style="list-style-type: none"> <li>Assist the human relations department manager and the business manager in obtaining information about the pre-owned areas, making arrangements for them, and disclosing this information to related employees and contractors.</li> <li>Coordination with the organizations and other shareholders participating the implementation</li> </ul>
<b>IMS and Sustainability Manager</b>	<ul style="list-style-type: none"> <li>Community Relations Department Manager/Director and Officer are provided with support to enable them to perform their duties in connection with the management of the sites and resources are made available for use.</li> </ul>
<b>Contractors</b>	<ul style="list-style-type: none"> <li>Full compliance to TÜMAD Cultural and Natural Assets Finding Procedures and other SOPs.</li> <li>Compliance to the TÜMAD cultural heritage and sacred areas plan and procedures set out in the Contractor contracts.</li> </ul>
<b>All Workers</b>	<ul style="list-style-type: none"> <li>Orientation training, all other trainings and learning TÜMAD Incidental Finding Procedure for Cultural and Natural Assets.</li> </ul>

## 6 MITIGATION MEASURES AND MANAGEMENT CONTROLS

Potential cultural heritage impacts will occur predominantly in the construction phase, because land clearance and other intrusive activities are required to prepare the site and build the project facilities. Although construction will be phased, it is understood that the maximum extent of the facility footprint will be determined in the first year. No movable and immovable cultural and natural assets were found during the construction phase of the Lapseki Project.

Each phase of Project implementation presents different potential risks to cultural heritage/archaeological sites, and these are summarised for the construction, operations and closure/post closure phases.

**Table 2: Summary of Potential Risks to Cultural Heritage**

Phase	Impact
<b>Construction</b>	<ul style="list-style-type: none"> <li>Extensive excavation will arise during the Projects as a result of open pit mining, Heap Leach Facility (HLF), Waste Rock Dump (WRD) and associated facilities and buildings.</li> <li>The pits, HLF, WRD and facilities and building areas have been surveyed as part of the pre-construction archaeological field work conducted in November 2015 for İvrindi Project and May 2015 for Lapseki Project.</li> <li>Disturbance of known archaeological sites is not expected.</li> <li>Issues arising during construction should be limited as the majority of the project area has now been subject to survey.</li> </ul>
<b>Operations</b>	<ul style="list-style-type: none"> <li>'Post construction' excavation should not arise during routine operations outside the pit area.</li> <li>If sites are threatened by operations, either directly or indirectly, they will be surveyed prior to disturbance, if impacts cannot be avoided by other mitigation measures.</li> <li>If the sites are not threatened, then the principle of 'preservation in situ wherever possible', which is upheld in all relevant legislation, on both a national and international level, would indicate that no further excavation should take place.</li> </ul>
<b>Closure</b>	<ul style="list-style-type: none"> <li>This phase is not expected to involve additional impacts to archaeological/cultural sites as disturbance of new areas should not be required.</li> <li>Reclamation activities that may require consideration of the potential for chance finds/new discoveries of archaeological/cultural sites.</li> </ul>

The control measures and Cultural Heritage programme described below have been developed in response to the risks identified by TÜMAD through the EIA process.

**Table 3: Key Management Controls**

ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
CH 01	Loss of Cultural Heritage sites and/or objects	Construction Operation	Implement TÜMAD CHMP procedures. Specifically: <ul style="list-style-type: none"> <li>Implementation of the Chance Find Procedure</li> <li>Monitoring/"watching briefs" conducted at specific construction and other sites</li> <li>Consultation with local communities related to cultural resources</li> <li>Communication and cooperation with the Contractors and the Çanakkale and Balıkesir Museums and/or other</li> </ul>	Environment and Social Managers Project Manager Mine Operations Manager Contractors	Records review

ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
			<p>appropriately qualified archaeological specialists.</p> <ul style="list-style-type: none"> <li>The Cultural Heritage Management Procedure is to apply and be made available to Contractor staff and their subcontractors, so the Plan is recognised, adopted and implemented by Contractors prior to the commencement of Construction or Operations work.</li> <li>Following to be implemented for Lapseki Project (Lapseki district, Şahinli and Kocabaşlar and nearby villages) and İvrindi Project (İvrindi District, Değirmenbaşı, Küçükılıca, Karadere settlements):</li> <li>Giving sponsorship support to various cultural events that are considered important by local community and regional stakeholders.</li> <li>Implementation of the Management Plan of Areas Being Important for Local Community in Terms of Cultural Heritage.</li> <li>Organization of a "hayr" festival annually by TÜMAD, to which all the nearby villages and institutions are invited.</li> <li>Keeping communication and relationship with stakeholders continuously and developing them according to the Stakeholder Participation Plan.</li> </ul>		

TÜMAD will prepare the Chance Find Procedure to identify the procedures to be followed in case of finding movable and immovable cultural and natural assets.

## 7 MONITORING

### 7.1 Key Monitoring Activities

Fundamental monitoring activities, shall focus on the matters and methods specified in *Table 5*.

**Table 4: Key Monitoring Activities**

ID	Subject/Situations	Methods	Periodic Repetition	Location
CH-01	Training on the Cultural and Natural Assets and the heritage	Number of Project personnel and contractor workers trained with Chance Find Procedure (TMD_KTİ_PRD.004)	Twice a year during construction, then annually	Tümad Lapseki and İvrindi construction areas
CH-02	Events regarding the cultural heritage	<ul style="list-style-type: none"> <li>Number of events reported in each monitoring period.</li> <li>All event investigations and attached mitigation measures when necessary and their completion</li> <li>Physical copies of the event reports shall be filed</li> </ul>	Twice a year during construction, then annually	Across the Project Areas

### 7.2 Key Performance Indicators

The table below summarizes key performance indicators and the associated key monitoring actions that can be used to assess the progress and effectiveness of the mitigation strategies proposed.

**Table 5: Key Performance Indicators**

ID	Key Performance Indicators	Objective
CH-KPI-01	The number of non-compliances against the key management controls given in this Plan in a year	Minimizing the reported number of non-compliances and aiming for zero.
CH-KPI-02	The number of grievances regarding the cultural heritage and the sites sacredly important for communities resolved within the target time frame.	<p>Researching the grievances regarding the cultural heritage (disrespect, destruction, removal, sale of the pieces) and carrying out regarding actions.</p> <p>Rapid response to complaints from local communities regarding inappropriate behavior of staff on cultural assets. Performing inspections within the period specified in the TÜMAD Complaint and Feedback Procedure (TMD_KTİ_PRD.001) and performing related actions.</p> <p>Target of 100%</p>

## **8 TRAINING**

The Project will make train its own personnel on the issue of the importance of cultural heritage, the possibility of chance find and the procedures to follow in the event of a chance find.

Contractors will be required to carry out a similar procedure with their staff and also to ensure that sub-contractors also have a procedure in place.

Training records shall be kept by HR, Community Relations and Environmental Department.

## **9 AUDIT**

### **Internal Audit**

Daily supervisions shall be carried out by shift chiefs/supervisors, covering a wide range of operating aspects, including cultural heritage (particularly incidental findings).

### **External Audit**

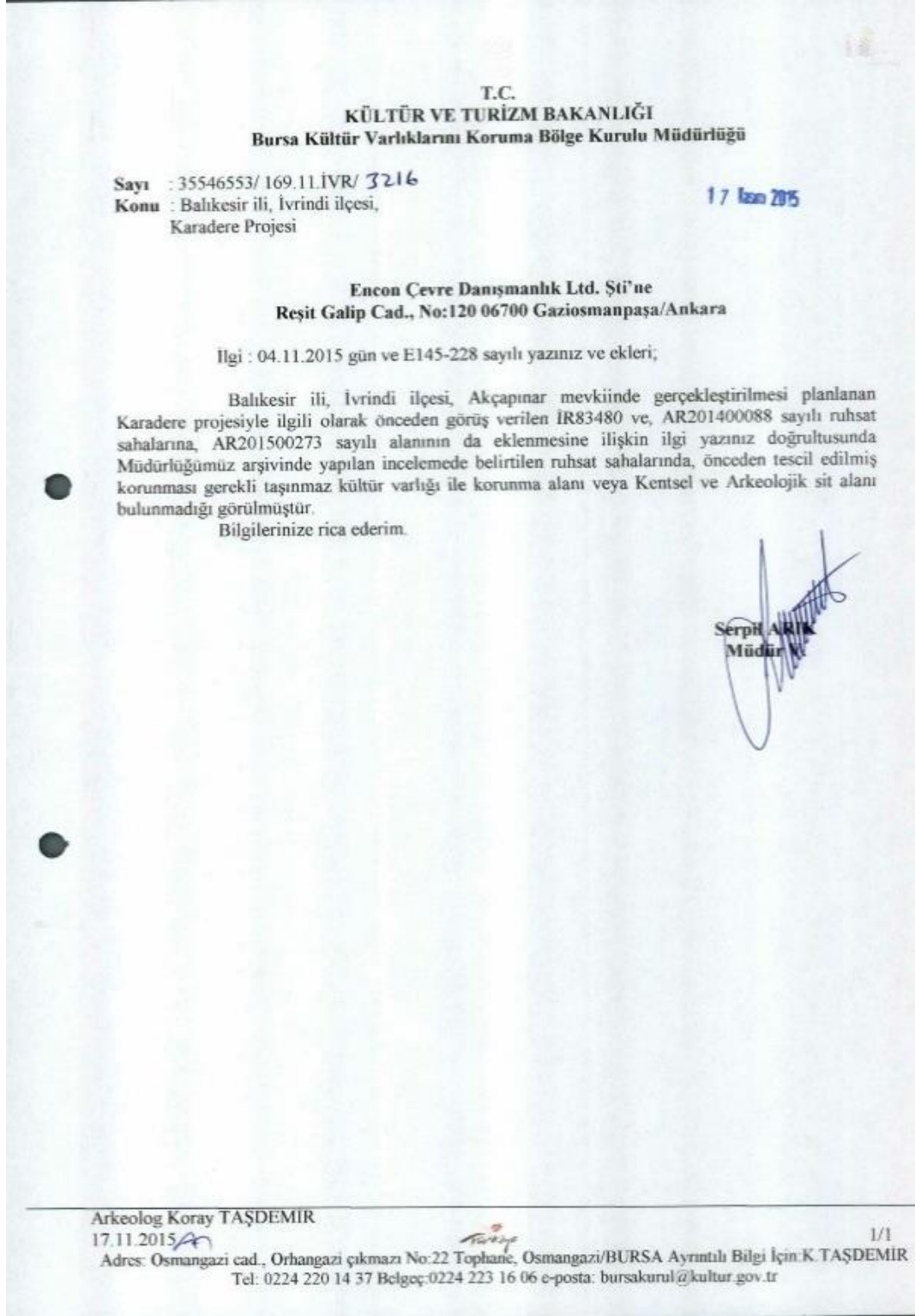
Implementation of this plan will be subject to the periodic assessment of audit programme to be defined by the Project Lenders.

## **10 RECORDING**


Records of inspections, inspections and events shall be managed in accordance with Tümad Mining Records Management Procedure (TMD\_EYS\_PRD.004).




## APPENDIX 1 – OFFICIAL LETTERS



*Opinion obtained from the relevant bodies regarding İvrindi project in that there are not any Movable - Immovable cultural and natural assets*

  
**T.C.**  
**ÇANAKKALE VALİLİĞİ**  
**İl Kültür ve Turizm Müdürlüğü**



Sayı : 63270896 / **1938** 14.../05/2015  
Konu : Lapseki Altın Gümüş Madeni ve  
Zenginleştirme Tesisi Projesi İDK Toplantısı;  
Proje Formatına İlişkin Kurum Görüşü

**ÇEVRE VE ŞEHİRCİLİK BAKANLIĞINA**  
(ÇED - İzin ve Denetim Genel Müdürlüğü)

İlgi: 30.04.2015 tarihli ve 000045-220.01-7053 (El) sayılı yazınız.

İlgi sayılı yazınızda belirtilen **İlimiz, Lapseki ilçesi, Şahinli ve Kocabaşlar** köyleri çevresinde; proje danışmanlığı MITTO Firması'nca, icraatı ise TÜMAD Madencilik San. ve Tic. Anonim Şirketi'nce yürütülen "**Altın ve Gümüş Madeni, Zenginleştirme Tesisi**" Projesi hakkındaki **İnceleme-Değerlendirme Komisyon Toplantısı** ile diğer ÇED çalışmaları için talep edilen İl Müdürlüğümüz görüşleri bağlamında; söz konusu maden ocağı ve çevresinin kültür varlığı açısından sit alanı olmadığı, tabiat varlığı açısından korunmaya alınmış alanlar içinde bulunmadığı, 2634 sayılı Turizmi Teşvik Kanunu kapsamında ilan edilen herhangi bir Kültür ve Turizm Koruma ve Gelişim Bölgesi (KTKGB) veya Turizm Merkezi sınırları içerisinde kalmadığı; bahse konu alanda, Bakanlığımız Yatırım ve İşletmeler Genel Müdürlüğü görev, yetki ve sorumlulukları kapsamında yürütülen herhangi bir çalışma bulunmadığı anlaşılmıştır.

2863 sayılı Kanun'un 4.maddesi uyarınca, bahse konu alanlarda yapılacak uygulamalarda herhangi bir kültür varlığına rastlanması durumunda, çalışmaların ivedilikle durdurularak, en yakın mülki amirliğe ve Mütze Müdürlüğüne haber verilmesi kaydıyla incelemeye konu alanda çalışma yapılmasında herhangi bir sakınca bulunmamaktadır.

Bilgilerinizi ve gereğini arz ederim.

  
**Kemal DOKUZ**  
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*Opinion obtained from the relevant bodies regarding Lapseki project in that there are not any Movable - Immovable cultural and natural assets*