



Acacia
Mining Operations

ACACIA MINE OPERATIONS

GÖKIRMAK COPPER MINE

Cultural Heritage Management Plan

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APPENDICES

Appendix 1: Field Work Results Status Table

Appendix 2: Chance Find Procedure

LIST OF ABBREVIATIONS

CHMP	Cultural Heritage Management Plan
ICOMOS	International Council of Monuments and Sites
IFA	Institute of Field Archaeologists
No	Number
UNESCO	United Nations Educational, Scientific and Cultural Organization

1. INTRODUCTION

Gökırmak Mining Project has carried out an impact assessment for cultural heritage within the project area in line with local legislation and the EBRD's PR 8. The purpose of this Cultural Heritage Management Plan (CHMP) is to **preserve the *archaeological and cultural heritage*** within the scope of the Gökırmak Mining Project and minimize the possible project impacts.

The impact mitigation on the potential and existing archaeological and cultural heritage sites within the project impact area is possible by developing a management plan. Therefore, the construction/mining activities within the scope of the Gökırmak Project should be conducted in compliance with this management plan.

2. SCOPE

This Cultural Heritage Management Plan applies to all project activities that have the potential to cause an impact on the cultural heritage. This includes especially all construction and mining activities of the Gökırmak Mining Project. Cultural protection measures, such as the Chance Find procedures are applicable for the Project.

2.1. Sources of Impact

- General project construction and mining activities (excavation, trenching, cutting, blasting, drilling etc.)
- Construction of access roads, main road, electrical transmission lines;
- Site preparation and infrastructure installation;
- Soil storage, waste storage and similar storage areas construction or their preparation,
- Construction of main or fly camps;
- Site rehabilitation and restatement.

3. OBJECTIVES

The general objectives of this Management Plan are to:

- Outline the applicable standards with regards to the protection of cultural heritage;
- Identify the actual and potential sources of impact on Cultural Heritage;
- Define roles and responsibilities;
- Define monitoring and reporting procedures;
- Define training requirements.
- Develop attainable mitigation measures to enhance positive impacts and avoid or manage negative impacts;
- Develop management and monitoring measures to be implemented throughout the lifecycle of the project.

4. LEGISLATION FRAMEWORK

In this section, the legislation framework related to the management of cultural heritage is summarized.

4.1. Local Laws and Legislation

In Turkey, the movable and immovable cultural and natural assets are put under protection in compliance with the “**Law on Preservation of Cultural and Natural Assets**”, **2863**, which was published in the Official Gazette numbered 18113 and dated 23 July 1983. The cultural and natural heritages, which are protected by the aforementioned Law, are identified as following:

- Natural properties which require protection and immovable assets which were built before the end of the 19th century;
- Any immovable cultural asset constructed after the end of the 19th century but categorized as “a significant asset which requires preservation” by the Ministry of Culture and Tourism;
- Immovable cultural assets located within the boundaries of Protection Sites; Structures, buildings or places that have witnessed significant historical events during the Turkish Independence War or the foundation of the Turkish Republic, regardless of their period and registration status; and all dwellings and buildings that have been used by Mustafa Kemal ATATURK without considering their period of construction or registration status.

In addition to the Law no: 2863 on Preservation of Cultural and Natural Assets, there are some regulations and principle decisions governing the management of cultural and natural assets. According to the Principle Decision no: 658, taken on November 5th 1999, “Archaeological Sites, Conditions of Protection and Usage”, the archaeological sites are classified into three main categories:

1st Degree Archaeological Sites: Areas requiring highest level of protection, with the exception of scientific excavations aiming protection. Neither construction nor development are allowed in these sites. All kinds of construction, excavation, and modification activities are prohibited within the boundaries of these sites. However, for exceptional cases such as the necessity for infrastructure construction, Regional Preservation Boards may permit such activities based on the approval of the relevant museum directorate and the head of the scientific excavation team

2nd Degree Archaeological Sites: Sites which require medium level of protection. They should be preserved based on the conditions of protection and utilisation set by the Regional Preservation Boards. Additional construction is prohibited. Similar to the 1st Degree Sites, for exceptional cases such as necessity for infrastructure construction among others, Regional Preservation Boards may permit such activities based on the approval of the relevant museum directorate and the head of the scientific excavation team.

3rd Degree Archaeological Sites: Lowest level of protection area. Construction is permitted based on the decisions of Regional Preservation Boards. Before applying for a construction permit, test pit excavations should be conducted and the outcomes of these excavations should be reviewed by the relevant museum and,

if present, the head of the scientific excavation team. Reviews should be submitted to Regional Preservation Boards. The Boards may ask for extension of the scope of test pits before taking any decision.

Furthermore, Implementation Guidelines for Field Surveys, Test Pits and Excavation Works on Cultural and Natural Assets (Ministry approval number 94949537-160.99-51264, dated 13.03.2013) define the procedures for salvage excavations, archaeological test pits and other studies.

4.2. International Standards

EBRD's policy on tangible and intangible cultural heritage is set out in Performance Requirement 8 (PR8). The objectives of PR 8 are:

- To support the conservation of cultural heritage in the context of EBRD-financed projects;
- To protect cultural heritage from adverse impacts of project activities;
- To promote the equitable sharing of benefits from the use of cultural heritage; and
- To promote the awareness of, and appreciation of, cultural heritage where possible.

The cultural heritage findings within the project impact area that were given as Appendix 1 of this plan.

5. ROLES AND RESPONSIBILITIES

Acacia Mine Operations will be responsible for the preparation and implementation of the environmental and social impact assessment based management plans, which are project specific. These plans shall be practical, detailed procedures for use in the field. Acacia Mine Operations will ensure the implementation of the commitments stated in the ESIA, project specific plans and also shall comply with all relevant project standards, statutory requirements, permit and licence conditions and secure all applicable permits and licences.

5.1. Management of Cultural Heritage

The basic definitions regarding the management of cultural heritage are given in the following bullets:

- Ministry of Culture and Tourism is the responsible authority.
- Kastamonu Archaeology Museum Directorate is responsible to provide experts for the sites within 24 hours after being informed and to officially define the Chance Find (described in Appendix 2). Museum directorate is responsible for the excavation of chance find areas. Museum Directorate will follow the directions and decisions of Ankara Regional Preservation Board of Cultural Assets No:1.
- Ankara Regional Preservation Board of Cultural Assets No:1 is the only decision maker on any intervention, which would be made on the site after the chance find.
- Acacia Mine Operations is responsible for the management of all cultural heritage assets during the progress of construction and mining phase of the Project and implementation of related management plan and chance find procedure.
- Acacia Mine Operations should mobilize cultural heritage responsible staff¹ for the monitoring of ground disturbance activities within project including impact areas in case a cultural heritage site was identified. They are also responsible with the monitoring of the implementation of the Cultural Heritage Management Plan (CHMP) and the Chance Find Procedure.
- Acacia Mine Operations will ensure that Chance Find Procedure is adequately enforced during all ground disturbance activities.
- In case of any further actions is required to identify the Chance Find (test pit or salvage excavation, other needed services), Acacia Mine Operations will mobilize an archaeology team (including necessary expertise and other workpower) and provide the necessary equipment.
- Acacia Mine Operations is responsible for giving necessary training to the field staff about the implementation of the chance find procedure.

¹ The cultural heritage responsible staff should have professional background in Archaeology/Art History etc. or should have minimum 3 years sector experience.

- Acacia Mine Operations will record all chance finds on the Chance Find Report Form and on the Chance Find Register as per the Chance Find Procedure in Appendix 2.

5.2. Management Structure and Responsibilities

Acacia Mine Operations is responsible for the management of the plan and implementing of the procedures on sites having high archaeological potential identified during the ESIA or in case of a chance find during construction or mining activities within the impact area of Gökırmak Mining Project. In order to implement the chance find procedure and cultural heritage management plan, a cultural heritage responsible staff will be assigned from Environment and Public Relation Department of the project. Capacity building training on Cultural Heritage Management Plan, Chance Find Procedure and other related issues will be organized and delivered to all project employees by the cultural heritage responsible staff under the supervision of Environmental and Public Relations Coordinator. Monitoring of the construction and mining works from protection of cultural heritage perspective will also be the responsibility of the cultural heritage responsible staff.

- The Project Manager will be in charge of the all work team.
- The Environmental and Public Relations Coordinator will supervise the cultural heritage responsible staff for the monitoring of cultural heritage and archaeological protection activities. Any cultural heritage related issue or chance finds will be directly reported to the Environmental and Public Relations Coordinator by the responsible staff in line with the Cultural Heritage Management Plan and Chance Find Procedures.
- The cultural heritage responsible staff will monitor the excavation activities and has authority to stop the work. The staff will accompany all ground disturbing activities of the project. In case of a chance find, stop or resume of the ground disturbing activities will be under the sole responsibility of the cultural heritage responsible staff. The staff will prepare and submit scheduled progress reports and special reports to the Environmental and Public Relations Coordinator in any case of chance finds

6. TRAINING, REPORTING AND MONITORING

6.1. Training

The cultural heritage responsible staff will provide cultural heritage trainings to all project employee including the implementation of the chance find procedure as part of their Environmental Training in coordination with the Environmental and Public Relation Coordinator

The staff will receive Environmental & Social Training as well as specialized training for the procedures to follow for all ground disturbed activities. These trainings will be organized as an internal training and repeated periodically. The expert/s and the site management will periodically *meet* once a month or when deemed necessary. The records of the training such as attendee list, the presentation made during the training, etc. will be kept by the cultural heritage responsible staff as hard copy and electronical copy.

6.2. Reporting

The cultural heritage responsible staff will record all chance finds on the Chance Find Report Form and the Chance Find Register as per the Chance Find Procedure in Appendix 2. The register will be kept up to date by the staff. The Chance Find Report Form will be kept in hard copy and as electronical copy (scanned version) at the project camp. A summary of the status of chance finds will be reported by the cultural heritage responsible staff to Environmental and Public Relations Coordinator on a weekly basis. These reports will be kept as annexes of Weekly Environmental and Social Reports.

6.3. Monitoring

The function of the archaeological monitoring process will be as follows:

- Provide advice to define the areas where the construction/mining activities may continue or shall be stopped due to archaeological/movable/immovable cultural heritage findings.
- To record archaeological/cultural heritage features observed on, and close to the existing project related areas.
- To record archaeological/cultural heritage features discovered during project construction and mining activities.
- To provide advice in the form of a 'preliminary assessment' to the relevant department on the significance and implications of new archaeological discoveries on the project construction and mining areas.

All ground disturbance activities will be monitored by cultural heritage/archaeological monitoring expert/s during the construction and mining activities. In case of encountering any archaeological/cultural heritage findings, the Chance Find Procedure described in Appendix 2 will be initiated.

The schedule for monitoring will be developed in coordination with the construction and mining schedule. Monitoring activities will be implemented daily. The monitoring schedule will be dictated by the construction schedule as determined by the construction/operation management. There is no sampling based work associated with the Cultural Heritage Management Plan.

7. ARCHAEOLOGICAL/CULTURAL HERITAGE FINDINGS

The procedure given in Appendix 2 that must be followed in case of encountering a chance find is based on national legislation and provisions of international standards and best practices. The significance of the archaeological/cultural heritage finding may vary upon the assessment of the Kastamonu Archaeology Museum Directorate as one of the significance levels given below. Regardless of the level of significance, in case of a finding the construction/mining activities shall be ceased in the field where the finding is discovered and the findings shall be reported to Kastamonu Archaeology Museum expert. Following the completion of investigation of the Kastamonu Archaeology Museum Directorate, the necessary arrangements, such as the identification of the boundaries of the archaeological/cultural heritage asset/site (finding), preservation by a protection band, notification of workers in order to prevent any physical intervention.

7.1. Minor Significance

This type of findings is comprised of a finding isolated from its environment or findings in notably small sizes which may be found by chance. In this case, chance find procedure (Appendix 2) will be followed.

7.2. Moderate Significance

This type of findings is small scale findings in groups or single findings with medium size architectural elements such as tombs. In any case of a chance find, the chance find procedure (Appendix 2) will be followed. In order to prevent a possible damage, necessary arrangements must be made to determine the boundaries of the archaeological remains to keep the construction equipment out of access.

7.3. Major Significance

This type of findings is comprised of findings with great importance such as a settlement area, a tumulus, a mound or a big necropolis (wide graveyard areas with archaeological characteristic) and the construction activities must be immediately stopped and chance find procedure (Appendix 2) will be followed. This type of chance find may cover the entire construction site and the relevant project areas such as stock areas, open-cast mine, ore stock area, soil stock area etc. that the entrance and exit of the construction/mining equipment and vehicles cannot be managed without giving any damage to the archaeological remains.

8. INTANGIBLE CULTURAL HERITAGE

Assessment of the "Gökırmak Copper Mining Project" impact on the intangible cultural heritage in the region by the mining activities; construction of the plant, opening up ore pit, construction of transmission lines, reserving ore stock areas and waste storage pools have been conducted. It is extremely important to respect people's right to privacy and to recognize that cultural knowledge is the intellectual property of those who hold it. To identify intangible cultural heritage assets in the region, in-depth interviews and expert observations were made with local residents in most of the villages in Gökırmak Copper Mining area where project will affect. The interviews were systematically done on each intangible cultural heritage topic and participant observations were used as guidance in analyses. Analyses show that;

- The majority of the population "Gökırmak Copper Mining Project" area is of Turkish ethnicity with not any distinct identity.
- Local people are mostly engaged with small scale gardening, small scale animal husbandry and foresting.
- Although it is vaguely believed today, oral cultural heritage still survives and is mostly about stories of the past, tails, jokes and anecdotes.
- Traditional celebrations of Life's Milestones are still known and nostalgia about them is present.
- Daily life (socialization) in villages of project area is concentrated around common village house (köy odası), Tea Houses in Hanönü for man and neighbor visits for woman.
- Unique local traditional institutions are not present but there are more than 15 local unions in Hanönü district mostly about agriculture such as irrigation unions or production unions owned by local producers.
- Cultural practice of traditional medicine and healing does not exist and is not believed.
- Weather forecast traditions still survive as remains of their rural past.
- Traditional knowledge to determine repetitiveness of community's social, economic, cultural, religious and magical events is absent.
- There is not any traditional mechanism to solve disputes within community members. Modern way of seeking justice is present through court and judiciary system of the state.
- Measuring and weighing traditions does not exist. Modern methods are used.
- Religious holidays such as Ramadan and festival of sacrifices are the only festivals widely celebrated.
- There is no region-specific child games, games for adults or sports games in project area.
- There are folk dances and traditional music of the area. Some are unique to Hanönü.

- There was a very wide spread hemp weaving and rug making tradition in the region as for handicrafts which is kept surviving through an income generation project.
- Knowledge of making living spaces with locally available materials is still available but not practiced anymore.
- Animal Husbandry, self-subsistence poultry and gardening has a distinct influence over local cuisine.

Settlers of Gökirmak Copper Mining area were found well informed about the project and all the interviewers knew what it will be constructed and which areas are going to be used. That gave a unique opportunity in analysis to link between significance of intangible cultural heritage related sites and ongoing / planned project area, while conducting interviews. There is a Public Relations Office in Hanönü which is open twice a week for local people to get information. There is also a public relations department of the project, stuffed with professionals and a program. We also came across to Announcement boards of the Project Administration at the entrance of the villages.

The Public Relations Office will liaise with local authorities to identify if project activities can interfere with traditional celebrations or festivities; alternative solutions will be agreed with local communities and authorities. Furthermore, the Office will liaise with local authorities and communities to identify if project activities restrict access to elements of traditional culture; alternative solutions will be agreed with local authorities and communities.

9. REFERENCES

- General Directorate of Preservation of Cultural and Historical Heritage, “Law on Protection of Cultural and Natural Assets (1) Law No. 2863”, 1983.
- ICOMOS (International Council of Monuments and Sites) “Guidance on Impact Assessment for Cultural World Heritage”, January 2011.
- IFA (Institute of Field Archaeologists) Standard and Guidance for the Collection, “Documentation, Conservation and Research of Archaeological Materials”, 2001.
- IFA (Institute of Field Archaeologists) 1994, “Standard and Guidance for an Archaeological Desk Based Assessment” (revised 1999)
- IFA (Institute of Field Archaeologists) 1994, “Standard and Guidance for an Archaeological Watching Brief” (revised 1999)
- IFA (Institute of Field Archaeologists) 1994, “Standard and Guidance for an Archaeological Field Evaluation” (revised 1999)
- UNESCO, “Convention Concerning the Protection of the World Cultural and Natural Heritage”, November 1972.

Appendix 1: Field Work Results Status Table

FIELD WORK RESULTS STATUS TABLE

Site Name	Province	District	Village	UTM	Coordinate System (ED 50, 6 degree)		Registration Status	Board Decision Date and Number	Distance to the Construction Area	Conservation Proposal
					X	Y	Yes /No			
Küpeli Houses	Kastamonu	Hanönü	Aşağı Küreçay/ Küpeli Quarter	36	616565	4609225	NO	N/A	100 m	Küpeli Houses consist of 3 traditional houses and their extensions within Küpeli quarter. As consultant opinion, it is strongly recommended to prepare measured drawings of these houses and to transmit these documentations to the Ankara Regional Board No: 1 for Conservation of Cultural Assets for archival purposes.
					616533	4609223				
					616554	4609192				
					616530	4609184				
Aşağı Küreçay Village Cemetery	Kastamonu	Hanönü	Aşağı Küreçay/ Küpeli Quarter	36	617100	4609560	NO	N/A	280 m	The cemetery is probably in use since 19th century. The stylised motif "Tree of life" was observed on many grave stones belonging probably to 19th century. Physical intervention should not be allowed.
					617067	4609579				
					617010	4609580				
					616985	4609578				
					616978	4609588				
					616932	4609600				
					616929	4609608				
Sepetçioğlu Traditional Houses	Kastamonu	Hanönü	Sepetçioğlu Quarter	36	618173	4607003	NO	N/A	0 m	Sepetçioğlu houses are located between the Open Pit and Surface Soil Storage Area. The measured drawings and pictures of these buildings which were prepared by PAYE Mühendislik in August 2017 should be submitted to Ankara Regional Board No: 1 for Conservation of Cultural Assets for their archives.

Appendix-2: Chance Find Procedure