



Acacia
Mining Operations

ACACIA MINE OPERATIONS

GÖKIRMAK COPPER MINE

Change Find Procedure

2017

Document Number

ACACIA-2017-E&S-REGİO-PRC-197

Disclosure Date

29.09.2017

Prepared By

**Çevre ve Halkla İlişkiler, REGİO
Consultancy**



Table of Contents

| | | |
|-----|---|-----------|
| 1. | INTRODUCTION | 1 |
| 1.1 | Purpose | 1 |
| 1.2 | Definitions | 1 |
| 1.3 | Abbreviations | 2 |
| 1.4 | References..... | 2 |
| 2. | ROLES AND RESPONSIBILITIES..... | 3 |
| 3. | CHANCE FIND PROCESS | 5 |
| 4. | MONITORING AND REPORTING | 8 |
| | <i>APPENDIX 1 – CHANCE FIND REPORT FORM</i> | <i>9</i> |
| | <i>APPENDIX 1 – CHANCE FIND REGISTER</i> | <i>13</i> |
| | <i>APPENDIX 3 – CONTACT INFORMATION</i> | <i>15</i> |

1. INTRODUCTION

Acacia Mine Operations is responsible for the management and protection of archaeological and heritage sites/resources within the Gökırmak Copper Mining Area. Some cultural heritage assets have been encountered within the project impact area and many archaeological sites and cultural heritage have been recognized assets around the project impact area during the desktop phase of the ESIA studies. Suggestions to protect cultural heritage assets and sites encountered within the project impact area were described on the ESIA. However, there is still a possibility of encountering some unknown archaeological sites and cultural heritage assets during project activities.

1.1 Purpose

The purpose of this document is to outline the procedure and respective responsibilities in relation to the management of Chance Finds during project works.

The procedure applies to all project activities within the project impact area (open pits, soil storage areas, process plants, closed ores, closed ore stock areas, spillways, cofferdam, process plants, spill ways, diversion tunnel etc.) and other above ground installations.

1.2 Definitions

| | |
|------------------------------------|--|
| CHANCE FIND | Potential cultural heritage objects, features or sites that are identified outside of a formal site reconnaissance, normally as a result of construction monitoring. |
| MUSEUM DIRECTORATE | Kastamonu Archaeology Museum Directorate |
| REGIONAL PRESERVATION BOARD | Ankara Regional Preservation Board of Cultural Assets No.1 |
| PROJECT | Gökırmak Mining Project |
| SHALL AND MUST | Indicates mandatory requirements. |
| SHOULD | Indicates that a provision is not mandatory, but recommended as good practice. |

1.3 Abbreviations

| Abbreviation | Definition |
|--------------|--|
| CHMP | Cultural Heritage Management Plan |
| E&S | Environmental and Social |
| ESIA | Environmental and Social Impact Assessment |

1.4 References

STANDARDS, LEGISLATIONS and LAWS

Ministry of Culture and Tourism, Law No:2863, **Preservation of Cultural and Natural Assets**

Ministry of Culture and Tourism, Principle Decision No: 658, **Archaeological Sites, Conditions of Protection and Usage**

European Bank for Reconstruction and Development- EBRD, Environmental and Social Policy, **PR08, Cultural Heritage**

2. ROLES AND RESPONSIBILITIES

Acacia Mining Co. is responsible to comply with the procedure with all its units during the project construction and mining activities. All employees involved in construction works will be trained for the implementation of the procedure.

| Project Role | Responsibilities | Location |
|--|---|----------|
| Site Manager | <p>Ensure E&S issues are being adequately addressed on site by all related departments.</p> <p>Support E&S site, provides adequate resources on site to implement E&S monitoring and inspection activities.</p> | Hanönü |
| Environmental and Public Relations Coordinator | <p>Preparation or revision of E&S documentation, plans and procedures as required.</p> <p>Participation in the identification process of significant impacts for the project, and assisting to develop relevant preventive and corrective actions.</p> <p>Coordination of environmental and social information flow.</p> <p>Ensuring that E&S mitigation measures are implemented and controlled during the project construction and mining activities.</p> <p>Developing and implementation of an environmental and social audit program and sharing lessons learned between all related departments and staff.</p> <p>Manages site based environmental inspectors, community liaison officers and cultural heritage/archaeological monitoring expert/s.</p> <p>Maintain effective communication with the construction and mining management team.</p> <p>Ensure the ESIA mitigation measures, through on-site daily inspection, advice and assistance to site construction and mining management and personnel on all environmental, social and cultural heritage matters.</p> <p>Day-to-day monitoring of construction and mining activities as they related to E&S performance.</p> <p>Raise NCR or Corrective Actions as required, and track closure.</p> <p>Participate in audits relating to E&S matters.</p> <p>Plan and Manage the environmental and social trainings for all project staff for Cultural Heritage Preservation and related</p> | Hanönü |

| | | |
|--|--|--------|
| | <p>procedures.</p> <p>Daily reporting of E&S issues in construction and mining activities to Site Management.</p> <p>Weekly reporting of E&S issues in construction and mining activities to Site Management.</p> <p>Participate to meetings related to Cultural Heritage issues.</p> | |
| Cultural Heritage Responsible Staff ¹ | <p>Provides advice in the form of a 'preliminary assessment' to the site and Environmental and Public Relations Coordinator on the significance and implications of new archaeological discoveries in the project activity areas.</p> <p>Ensures Chance Find Procedure is followed,</p> <p>Conducts and documents pre-construction/pre-mining surveys</p> <p>Records archaeological features discovered during pre-construction/pre-mining and ground disturbance activities.</p> <p>Determines the needs for cultural heritage resources protection and implement mitigation measures.</p> <p>Has the authority to stop ground disturbance activities to investigate potential chance finds.</p> <p>Ensures that the relevant cultural heritage signs are displayed where and when required.</p> <p>Implements chance find procedure and provides expertise during a chance find.</p> <p>Delivers cultural heritage preservation trainings to all project staff.</p> <p>Issues non-compliances when required and ensures all corrective actions are completed in a timely manner</p> <p>Provides daily field and monitoring reports to the E&S manager</p> <p>Conforms to all requirements of the archaeological/cultural heritage assets recommendations in the ESIA</p> | Hanönü |

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

3. CHANCE FIND PROCESS

The following table outlines the step by step process to be followed upon a chance find discovery.

| | |
|--|--|
| STEP 1 – After the discovery of a chance find: <ul style="list-style-type: none">• All work must cease at the location where discovery is made• A temporary buffer zone around the chance find will be put in place• Cultural Heritage responsible staff will be on site during all ground disturbance activities• Cultural Heritage responsible staff contacts site management and museum archaeologist <u>immediately</u>• Cultural Heritage responsible staff properly secures chance find site: flagging, no-entry signs etc.• Protection of site: chance find should not be moved, removed or further disturbed | |
| STEP 2 - Recording <ul style="list-style-type: none">• Cultural Heritage responsible staff fills out Chance Find form Part A and sends a copy to E&S manager within 24 hours• Cultural Heritage responsible staff retains a copy of Chance Find form for his/her record | |
| STEP 3 – Contact with local authority <ul style="list-style-type: none">• Cultural Heritage responsible staff notifies Kastamonu Archaeology Museum Directorate for the chance find | |
| STEP 4 – Authority's decision <ul style="list-style-type: none">• Kastamonu Archaeology Museum archaeologist decides that the following actions for chance find area. | |
| STEP 4 A – No significance to site <ul style="list-style-type: none">• The museum archaeologist declares that the site is considered to be of no significance• Cultural Heritage responsible staff informs relevant managers• Cultural Heritage responsible staff records the decision on Part B of Chance Find form and sends a copy to E&S manager within 24 hours• Cultural Heritage responsible staff retains a copy of Chance Find form for his/her record• No further actions required• This step closes out the chance find procedure• <i>Construction/mining activities may resume</i> | STEP 4 B – Significance to site <ul style="list-style-type: none">• The museum archaeologist declares that the site is considered to be of significance• Museum directorate archaeologist decides on further actions and informs the Cultural Heritage responsible staff .• • Cultural Heritage responsible staff informs relevant managers.• • Cultural Heritage responsible staff records the decision on Part B of Chance Find form• Proceed to Step 5 |

STEP 5 – Site investigation

- Project personnel follows Kastamonu Archaeology Museum directorate archaeologist's instructions

- After field investigation, Museum archaeologist declares **the site has minor significance**
- Cultural Heritage responsible staff inform their managers
- Cultural Heritage responsible staff records the decision on Chance Find form Part C and sends a copy to E&S manager within 24 hours
- Cultural Heritage responsible staff retains a copy of Chance Find form for his/her records
- No further actions required
- This step closes out the chance find procedure
- ***Construction/Mining activities may resume***

- After field investigation, Museum archaeologist declares **the site has moderate significance**
- Further studies such as test pit / salvage excavations or remote sensing investigation are to be completed
- Museum directorate archaeologist provides instructions, and/or supervision for the studies
- Cultural Heritage responsible staff informs their managers
- Under the supervision of the museum archaeologist, project management provides a study team. The team will be composed of qualified archaeologists other experts and workers.
- Once the excavation is completed, the study team provides a report to the museum directorate,
- The museum directorate reports the study outcomes to the Ankara Regional Preservation Board of Cultural Assets No. 1.
- Ankara Regional Preservation Board of Cultural Assets No.1 officially confirms completion of recovery and informs the project management.
- Cultural Heritage responsible staff records the decision on Chance Find form Part C and

- After field investigation, Museum archaeologist declares **the site has major significance**
- Salvage excavation is to be completed
- Site is to be treated according to Turkish archaeological regulations "Law on the Conservation of Cultural and Natural Property (2863) 21.07.1983
- Museum directorate archaeologist provides instructions, and/or supervision for test pit/salvage archaeological excavation
- Cultural Heritage responsible staff inform their managers
- Under the supervision of the museum archaeologist, project management provides a salvage excavation team. The team will be composed of qualified archaeologist and workers.
- Once the excavation is completed, salvage excavation team provides a report to museum directorate
- Ankara Regional Preservation Board No.1 of Cultural Assets officially confirms completion of recovery and informs the project management.
- Site will be officially recorded and protected according to Turkish regulations

| | | |
|--|--|--|
| | <p>sends a copy to E&S manager within 24 hours</p> <ul style="list-style-type: none"> • Cultural Heritage responsible staff retains a copy of Chance Find form for his/her record • No further actions required • This step closes out the chance find procedure • <i>Construction/Mining activities may resume</i> | <ul style="list-style-type: none"> • Cultural Heritage responsible staff inform to the related managers. • Cultural Heritage responsible staff records the decision on Chance Find form Part C and sends a copy to E&S manager within 24 hours • Cultural Heritage responsible staff retains a copy of Chance Find form for his/her record • No further actions required • This step closes out the chance find procedure • <i>Construction/Mining activities may resume or preventive further actions are need to be taken</i> |
|--|--|--|

It is important to note that in case human remains are found, all project team and the local authorities will be immediately notified.

4. MONITORING AND REPORTING

Cultural Heritage responsible staff will visually monitor all ground disturbance and all mining activities for evidence of presence of cultural heritage items.

Chance Finds will be recorded on the Chance Find Report form (see Appendix 1). All Chance Find Report forms will be kept in hard copy at the camp and will also be scanned and saved electronically after completion of each section of the form.

Chance Finds will be recorded in the Chance Find Register (see Appendix 2) which will be kept up to date by Cultural Heritage responsible staff . It will be reviewed in regular E&S meetings (weekly or monthly).

APPENDIX 1 – CHANCE FIND REPORT FORM

CHANCE FIND REPORT FORM
RASLANTISAL BULUNTU RAPOR FORMU

| | | | |
|---|---|---|---|
| PART A BÖLÜM A | | | |
| Project Location: <i>Proje Sahası</i> | District (İlçe): Village (Köy): | Date: <i>Tarih</i> | Form No: |
| Name of person reporting chance find: <i>Rastlantısal buluntuyu rapor eden kişinin ismi</i> | | | |
| Was work stopped in the immediate vicinity of the chance find? <i>Rastlantısal buluntunun tam çevresinde iş durduruldu mu?</i> | | <input type="checkbox"/> Yes <i>Evet</i> | <input type="checkbox"/> No <i>Hayır</i> |
| Was a buffer zone created to protect the chance find? <i>Rastlantısal buluntuyu korumak için tampon bölge oluşturuldu mu?</i> | | <input type="checkbox"/> Yes <i>Evet</i> | <input type="checkbox"/> No <i>Hayır</i> |
| NOTIFICATION BİLDİRİM | | | |
| Site manager and E&S manager contacted <i>Saha Müdürü ve Çevre müdürü ile irtibata geçildi</i> | | <input type="checkbox"/> Yes <i>Evet</i> | <input type="checkbox"/> No <i>Hayır</i> |
| CHANCE FIND DETAILS RASLANTISAL BULUNTU AYRINTILARI | | | |
| GPS coordinates <i>GPS koordinatları</i> | Photo record <input type="checkbox"/> Yes <input type="checkbox"/> No (HD quality – no cell phone photos) <i>Fotoğraf kaydı Evet Hayır</i> (HD kalitesinde – cep telefonu fotoğrafı değil) If not, explain why: <i>Yok ise nedenini açıklayınız</i> Other records <input type="checkbox"/> Yes <input type="checkbox"/> No Specify (drawings, HD quality videos, etc.): <i>Diğer kayıtlar Evet Hayır</i> <i>Belirtin (çizimler, HD kalite videolar, vb.)</i> | | |
| Description of chance find: <i>Rastlantısal buluntunun tanımı</i> | | | |
| Description of site and vegetation: (e.g. surface sediment type, ground surface visibility, distance to | | | |

closest watercourse, etc.)

Sahanın ve bitki örtüsünün tanımı: (örn. Yüzey sediman türü, yüzey zemin görünürlüğü, en yakın su yoluna olan mesafe, vb.)

PART B
BÖLÜM B

NOTIFICATION OF KASTAMONU ARCHAEOLOGY MUSEUM DIRECTORATE ARCHAEOLOGIST
KASTAMONU ARKEOLOJİ MÜZE MÜDÜRLÜĞÜ ARKEOLOĞUNA BİLDİRİ

Monitoring archaeologist contacted museum directorate archaeologist
Arkeolog müze müdürlüğü arkeoloğu ile irtibata geçti.

☐ Yes
Evet

☐ No
Hayır

Date of notification:
Bildirim tarihi

Name of museum directorate archaeologist :
Müze müdürlüğü arkeoloğunun ismi

Contact number of museum directorate archaeologist:
Müze müdürlüğü arkeoloğunun iletişim numarası

DECISION OF KASTAMONU ARCHAEOLOGY MUSEUM DIRECTORATE ARCHAEOLOGIST
KASTAMONU ARKEOLOJİ MÜZE MÜDÜRLÜĞÜ KARARI

Date of site visit:
İlk saha ziyaret tarihi:

☐ Site of no significance - Construction to proceed with no further action – End of chance find procedure
Önemsiz saha – İnşaat daha fazla araştırma yapılmadan devam edilebilir – rastlantısal buluntu prosedürün sonu.

Date of notice to resume work:
İşe başlama tarihi bildirisi

☐ Site of significance - Further actions required
Önemli saha – Ek araştırma gerekmektedir

Please Fill out Part C
Lütfen Bölüm C'yi doldurun.

Name of museum directorate archaeologist:
Müze müdürlüğü arkeoloğunun ismi
Contact information:
İletişim numarası

Site manager and E&S manager contacted
Saha Müdürü ve Çevre müdürü ile irtibata geçildi

☐ Yes
Evet

☐ No
Hayır

PART C
BÖLÜM C

FURTHER FIELD INVESTIGATION

EK SAHA ARAŞTIRMASI

☐ Site of minor significance
Önemsiz saha

☐ Site of moderate significance
Az önemli saha

☐ Site of major significance
Çok önemli saha

Describe additional work to be conducted:

Yapılması gereken ek işlerin tanımları

Date started:

Başlangıç tarihi

Date completed:

Bitiriş tarihi

Date of notice to resume work :

İşe başlama tarihi bildirisi

Name of museum directorate archaeologist:

Müze müdürlüğü arkeoloğunun ismi:

Contact information:

İletişim numarası

Construction manager contacted

İnşaat müdürü ile irtibata geçildi

☐ Yes

Evet

☐ No

Hayır

APPENDIX 1 – CHANCE FIND REGISTER

CHANCE FIND REGISTER

[illegible]

APPENDIX 3 – CONTACT INFORMATION

| |
|--|
| KASTAMONU ARCHAEOLOGY MUSEUM KASTAMONU ARKEOLOJİ MÜZESİ |
| Address/Adres: Cumhuriyet Cad. KASTAMONU |
| Tel: (0366) 214 10 70 |
| Faks: (0366) 214 54 56 |
| e-mail/e-posta: kastamonumuzesi@kultur.gov.tr |

| | |
|---|---------------------------------|
| ANKARA REGIONAL PRESERVATION BOARD No:1 of CULTURAL ASSETS ANKARA 1 NUMARALI KÜLTÜR VARLIKLARINI KORUMA BÖLGE KURULU | |
| RESPONSIBILITY AREAS: GÖREV ALANI: | ANKARA,BOLU,ÇANKIRI, KASTAMONU |
| MANAGER: MÜDÜR: | YUSUF KIRAÇ |
| ADDRESS: ADRES: | Konya Sokak No:46 ULUS / ANKARA |
| TELEFON: | (0312) 310 42 96 |
| FAX: | (0312) 310 43 41 |
| E-MAIL: E-POSTA: | ankarakurul@kultur.gov.tr |