TABLE OF CONTENTS

18. CULTURAL HERITAGE .......................................................................................... 2
  18.1 INTRODUCTION .......................................................................................... 2
  18.1.1 Objectives ............................................................................................... 2
  18.2 SUMMARY POLICY CONTEXT .................................................................... 2
  18.3 SCOPE AND ASSESSMENT METHODOLOGY .............................................. 2
  18.4 BASELINE ..................................................................................................... 2
    18.4.1 Heritage Context .................................................................................... 2
    18.4.2 Tangible Cultural Heritage ..................................................................... 7
    18.4.3 Intangible Cultural Heritage .................................................................. 13
  18.5 IMPACT ASSESSMENT ................................................................................. 15
    18.5.1 Construction Phase Impacts and Mitigation Measures ......................... 16
    18.5.2 Summary of Impacts and Mitigation Measures .................................... 16
  18.6 MONITORING REQUIREMENTS .................................................................... 18

Figures

Figure 18-1: Archaeological timeline .................................................................... 3
Figure 18-2: Develi Kalesi .................................................................................... 5
Figure 18-3: Rock-cut architecture of Öksüt Kalesi ............................................. 6
Figure 18-4: Archaeological Sites in the vicinity of Öksüt Project ....................... 6
Figure 18-5: Archeological Protection Area, Sivas-Yozgat-Kayseri Environmental Plan ................................................. 7
Figure 18-6: Büyük Meşe Tepesi ........................................................................ 8
Figure 18-7: Mödüge Kale Tepe ........................................................................... 9
Figure 18-8: Öksüt Valley and Elmalık Mevkii ................................................... 9
Figure 18-9: Bozdağ .......................................................................................... 10
Figure 18-10: Demirciler Mahallesi ................................................................... 11
Figure 18-11: Potential Archaeological sites identified during Field Surveys ........ 12

Tables

Table 18-1: Construction, Operations and Closure Phase Impacts and Mitigation Measures .......... 17
Table 18-2: Cultural Heritage Monitoring Requirements ........................................... 18
18. Cultural Heritage

18.1 Introduction
This Chapter presents an assessment of the predicted impacts associated with cultural heritage during the construction, operation and closure phases of the Project. Cultural heritage includes:

- Physical cultural heritage refers to movable or immovable objects, sites, groups of structures as well as cultural or sacred spaces associated therewith, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic or other cultural significance.
- Intangible cultural heritage refers to practices, representations, expressions, knowledge and skills that communities, groups and, in some cases, individuals recognise as part of their cultural heritage and which are transmitted from generation to generation.

18.1.1 Objectives
The specific objectives of this cultural heritage impact assessment are to:

- identify and document tangible and intangible cultural heritage in Turkey and the social study area;
- Identify the potential positive and negative impacts of Project;
- develop attainable mitigation measures to enhance positive impacts and reduce or avoid negative impacts;
- develop management and monitoring measures to be implemented throughout the life of the project.

18.2 Summary Policy Context
See Chapter 13 for the policy context.

18.3 Scope and Assessment Methodology
See Chapter 13 for the scope and assessment methodology.

18.4 Baseline

18.4.1 Heritage Context
National Level

The Anatolia region is rich in cultural heritage including archaeological remains dating back to the early Bronze Age. The following archaeological and historical context is provided for the Country and Province.
Mesolithic (c. 10,000 to 6,800 BC)

The retreat of the ice sheets of the Würm glaciation marked the end of the Pleistocene epoch and the start of the Holocene. The climate became more temperate, and ice-sheets retreated from the tops of mountains in the region that is now Turkey. Mesolithic populations subsisted by semi-nomadic, seasonal hunting and gathering. Bows and arrows, slingshots, and composite tools made from small microliths were developed. Mesolithic material has been discovered at sites such as Hallan Çemi Tepesi and Aşıklı Höyük in central Turkey.

Neolithic and Eneolithic / Chalcolithic (c. 6,800 to 3,200 BC)

During the early Neolithic period, there was a shift towards the domestication of animals and plants. Pottery, textiles and a range of new stone agricultural tools were developed. Neolithic houses, made of mud and wood, were built in small villages. These were often located in river valleys. During the Eneolithic/Chalcolithic period (c. 5,000 to 3,200 BC), copper and gold metalworking was developed.

One of the most notable Neolithic sites is that of Çatalhöyük in south-central Turkey, a multicomponent settlement site that shows clear evidence of agriculture and animal domestication.

Bronze Age (c. 3300 to 1200 BC)

During the Bronze Age, farming and technology continued to develop and societies became more complex as social hierarchies emerged. Bronze metalworking developed and land and sea trade expanded. A number of Chalcolithic settlements have been identified in Kayseri Province. This period also saw the rise of the Hittites and the Assyrians, both of which had knowledge at this time of early iron working.

Iron Age (c. 900 BC to AD 200)

The collapse of the Hittite kingdom (1200 to 1180 BC) saw the arrival of the Phrygians and other Indo-European migrants from the west and the expansion of the Urartian kingdom in the east. During this period there is a general shift from Black Sea coastal settlement sites to those on the inland plateaus.

---

1. Asouti, E. 2006 Beyond the Pre-Pottery Neolithic B Interaction Sphere World Prehistory 20, 87–126
Antiquity (c. 800 BC to AD 395)

Principal Turkish exports during this period included fish and processed fish, timber and wooden items, metal goods, gems, olive oil, and wine, while imports from the Mediterranean included oil, wine, and finished products (e.g. ceramics, metal goods, glassware).⁷

Medieval (370 to 1475) and Post-medieval Periods (1475 to 1829)

The Byzantine Empire began in 4th century AD after the Roman capital was moved to the city of Byzantium and renamed Constantinople (now Istanbul). As the Byzantine Empire sought control over the eastern Mediterranean and Black Seas, many naval engagements resulted.⁸ There was much political unrest and naval warfare between the Byzantines, Germanic kingdoms, and Persians during this time.

Russian forces began to challenge the Ottomans starting in the 16th century. The following centuries saw a series of Russo-Turkish Wars and treaties.

Archaeological remains from the post-medieval period can be found throughout Anatolia, especially at the site of Zeytinlik (Sinop) on the Black Sea coast and İzni on the Sea of Marmara, which consist primarily of Ottoman ceramic.⁹

Modern Period (1922 to Present)

During the early 20th century, the political climate of Turkey changed with the creation of the Republic of Turkey in 1923. Turkey stayed largely neutral during World War II, but did join the Allied forces towards the end of the war. In- and out-migration within and between Turkey and foreign nations continues to the present, and with this, changes to culture.

Provincial Level

Kayseri is located in the southern region of Central Anatolia where the Taurus Mountains and Central Anatolian Plateau meet. The region is known for its archaeological cultural heritage dating back to the Early Bronze Age, Neolithic and Chalcolithic periods.

There are a number of nationally significant archaeological sites in the province including Kültepe and Frakdin Höyük. Kültepe provides an uninterrupted cultural history from Early Bronze Age to the Hellenistic Period. The most striking cultural period of Kültepe is the Middle Bronze Age. Kültepe yielded approximately 23,500 cuneiform tablets documenting trade activities of Assyrian traders coming from Northern Mesopotamia, and the site was a key city along the trade route and acted as a port for raw materials coming from Mesopotamia, distributed throughout Anatolia.

The Develi Plain lies on the south-southeast of Mount Erciyes and is one of the largest plains in Kayseri Province. The archaeological potential of the plain has been investigated through a number of surveys. Frakdin Höyük and Frakdin Monument are two of the most important sites within the plain located within Gümüşören Village, approximately 15 km east of Öksüt. Frakdin Höyük dates back to the Early Bronze Age and provides significant information on this early period in the region. Frakdin Monument dates back to the Hittite Empire and depicts a religious libation scene of Hittite King Hattusili III and Queen Puduhepa.

Develi has a rich cultural heritage with a number of unexcavated settlements and monuments dating back to the Iron Age, Hellenistic, Roman and Medieval periods. Examples of Medieval sites in and around Develi include the Kalesi/Develi Fortress, Dev Ali Türbesi/Dev Ali Tomb, Kalesi/Öksüt Fortress and various tumuli.¹⁰

---

¹⁰ burial mounds
- Develi Kalesi: located on a hilltop at Upper Develi commanding a strategically significant location within the plain (Figure 18-2). The site covers an area of approximately 900 m² and is believed to date back to the Roman period.

- Develi Türbesi (Devali Tomb): located in Upper Develi and was built at the end of XII\textsuperscript{th} century AD for a local individual of significance. Devali Türbesi is well preserved and is an important location for visiting Muslims.

- Öksüt Kalesi: made up of a number of rock-cut structures which date back to the Roman Period. Located in Öksüt village, the site has been registered on the Ministry of Culture and Tourism (MCT) archaeological site list (Figure 18-3).

- Tumulus, ancient burial grounds, are a common archaeological feature on the hilltops in the region and likely date back to the Roman Period.

Figure 18-4 provides a summary of the locations of the archaeological sites in the region surrounding the Öksüt Project in Kayseri Province.

\textit{Figure 18-2: Develi Kalesi}\textsuperscript{11}

\textsuperscript{11} Prof. Dr. S. Yücel ŞENYURT, Dr. Atakan AKÇAY, Dr. Yalçın KAMIŞ, Gazi University Archaeology Department 2012 and 2013
Figure 18-3: Rock-cut architecture of Öksüt Kalesi\textsuperscript{12}

Figure 18-4: Archaeological Sites in the vicinity of Öksüt Project\textsuperscript{13}

\textsuperscript{12} Prof. Dr. S. Yücel ŞENYURT, Dr. Atakan AKÇAY, Dr. Yalçın KAMIŞ, Gazi University Archaeology Department 2012 and 2013

\textsuperscript{13} Prof. Dr. S. Yücel ŞENYURT, Dr. Atakan AKÇAY, Dr. Yalçın KAMIŞ, Gazi University Archaeology Department 2012 and 2013
18.4.2 Tangible Cultural Heritage

Archaeology

North of the licence area is an Archaeological Protection Area (Figure 18-5), which is designated under the approved Sivas-Yozgat-Kayseri Environmental Plan. The archaeological protection area is located outside of the EIA Permitted Area.

Figure 18-5: Archeological Protection Area, Sivas-Yozgat-Kayseri Environmental Plan

Archaeological Surveys

Surface reconnaissance surveys of the OMAS Licences where undertaken by archaeologists in October 2012 and October 2013 (Annex D). Potential site indicators documented within the OMAS Licences included rock piles; apparent artificial mounding of earth; gravestones; surface artefact scatters; and ruined architectural features such as walls or building foundations.

Fieldwork in the OMAS Licences identified a total of 7 potential cultural heritage sites within the licence area boundary. The sites include:

- Medieval period natural watchtower;
- Mödüge Kale Tepe fortress remains;

---

14 Sivas-Yozgat-Kayseri Environmental Plan
15 Prof. Dr. S. Yücel ŞENYURT, Dr. Atakan AKÇAY, Dr. Yalçın KAMIŞ, Gazi University Archaeology Department 2012 and 2013
• Early Bronze Age terrace settlement;
• Medieval building foundations and walls;
• Stone piled Kurgans;
• Tumulus (ancient burial ground).

A summary of potential cultural heritage sites identified by the archaeologists during surveys of the OMAS Licences is provided below. Locations of these sites are provided in Figure 18-4

**Büyük Meşe Tepe:** a rocky area located to the south of the main drilling field which reflects characteristics of a natural watchtower due to its position overlooking Öksüt Village (Figure 18-6). Archaeological settlement remains were not detected on the hill, although a few pottery fragments were found on a wide flat area lying to the northwest of the hill. The absence of any archaeological fill or architectural remains means that this area is not considered to be archaeologically significant.

**Figure 18-6: Büyük Meşe Tepesi**

![Büyük Meşe Tepesi](image)

**Mödüge Kale Tepe (also known locally as Odunlukkale):** Is the remains of a fortress that is located on the hillside overlooking the valleys of Bozdağ (1,809 m), Zindan Dağı (1,650 m) and Akpınar Tepesi (2,070 m). Architectural remains of the small fortress cover approximately 25 x 75 m.

The fortress was constructed on a rocky area and a steep terrace borders its northern section. The southern and eastern sections of the fortress are bordered by more gentle terraces and are better preserved as they were constructed directly on bedrock. Remains in the south and east reach 2 m in height on some places. Fortress walls were erected with dry masonry techniques and binding materials were not used. Remains of rectangular rooms within the fortress are visible in some parts of the site (Figure 18-7). Archaeological materials helpful for dating, such as pottery fragments, were not found inside the remains. Given the architectural characteristics and building techniques it is estimated to be approximately Medieval in date. It is likely that the fortress functioned as a watch tower during this Period.

---

16 Prof. Dr. S. Yücel ŞENYURT, Dr. Atakan AKÇAY, Dr. Yalçın KAMIŞ, Gazi University Archaeology Department 2012 and 2013
Terrace settlement at Elmalık Mevkii: This site is located approximately 2 km northeast of Öksüt village between Elmalıcı Tepe and Bozyazı ridge. The settlement is located on alluvial fill of the tributaries of Çamboğazı and Seben streams. The settlement area is well watered and has resulted in some alluvial cover of archaeological remains. Despite this alluvial cover it is possible to see some architectural remains together with a significant amount of pottery and obsidian tool fragments. These finds suggest that the site was likely a hillside settlement dated to Early Bronze Age (3000-2000 BC). This site is located inside the area planned as the construction area and Project camp site (Figure 18-8).

Figure 18-8: Öksüt Valley and Elmalık Mevkii

17 Prof. Dr. S. Yücel ŞENYURT, Dr. Atakan AKÇAY, Dr. Yalçın KAMIŞ, Gazi University Archaeology Department 2012 and 2013
18 Prof. Dr. S. Yücel ŞENYURT, Dr. Atakan AKÇAY, Dr. Yalçın KAMIŞ, Gazi University Archaeology Department 2012 and 2013
Bozdağ Tepesi: located approximately 2.5 km west of Mödüge Kale are the wall remains of a building covering approximately 10 x 10 m area. The walls of the building were constructed with dry masonry from medium sized flat stones. Internal wall remains indicate that the building had more than one room. This building was directly constructed on the bedrock on top of the Bozdağ. A limited number of medieval pottery shards inside and around this building were observed. The building has a direct view of the Mödüge Kale and its commanding location over the valleys and plain suggests that it was possibly used as a small watch tower.

Figure 18-9: Bozdağ

Zindan Dağı Structures: Located on the flat area of Zindan Dağ summit are three structures considered to be stone piled Kurgans. These stone piled kurgans are approximately 1 m in height and 4–5 m wide. Illegal excavation pits were observed on two of them. It was not possible to see any pottery shards around these kurgans. The site is considered to be in bad condition.

Tumulus: Located approximately 500 m west of Elmalık Mevkii is a manmade hill considered to be a tumulus (ancient burial ground). Surrounded by agricultural fields the mound is approximately 4 m tall and 15 m wide. This site is considered to be an archaeologically significant site by the local community within the Öksüt Project area. There were no archaeological findings around the tumulus, which was formed with stone and earth piling. The site is considered to be in good condition.

Demirciler Mahallesi: Located outside the Project licence area, is considered to be an archeologically significant site by the local communities and authorities. The site includes the remains of an old village. It is located to the southeast of Zile Köyü on the flanks of the hill by the current entrance to the Öksüt project. It is possible to see remains of foundations of old buildings and an abundance of pottery sherds at the site (Figure 18-10). It was assessed during the 2012 -13 field research that this site will not be affected by planned project related activities.

19 Prof. Dr. S. Yücel ŞENYURT, Dr. Atakan AKÇAY, Dr. Yalçın KAMIŞ,Gazi University Archaeology Department 2012 and 2013
Outcomes from Archaeological Surveys

Following the outcomes of the survey OMAS moved the fence line to avoid the Mödüge Kale Tepe and Büyük Meşe Tepe archaeological sites, the sites are now located outside the EIA Permitted area. Locations of these sites are shown in Figure 18-11.

20 Prof. Dr. S. Yücel ŞENYURT, Dr. Atakan AKÇAY, Dr. Yalçın KAMIŞ, Gazi University Archaeology Department 2012 and 2013
Figure 18-11: Potential Archaeological sites identified during Field Surveys
In early 2014 the OMAS exploration team found some unknown stones located within the EIA Permitted Area (close to the proposed site for the Heap Leach Facility). When the site was discovered the exploration team carried out the controls in the OMAS Chance Finds Procedure:

- Secure the site (tape perimeter).
- Mark the site using GPS.
- Inform Kayseri Management of Culture and Tourism.
- Kayseri Management of Culture and Tourism undertake site visit and archaeological survey.

On the 25th September 2014 archaeologists from the Protection of the Cultural Heritage Branch of the Kayseri Directorate of Culture and Tourism undertook a survey of the EIA Permitted Area. During this visit, they deemed that the unknown stones were not of archaeological significance and that there were no other sites of archaeological value within the EIA Permitted Area.

On the 29th September 2014 the Kayseri Management of Culture and Tourism provided OMAS with a letter informing them that there were no cultural heritage artefacts or places of first or second class classification or cultural sites and/or buildings in the mine operation site (EIA Permitted Area) were identified. The letter confirming this is provided in Annex E.

In December 2015, the Ministry of Environment and Urbanisation provided an official opinion to confirm that there are no protected or restricted areas around or along the power line route in terms of law No. 2863 on the protection of cultural and natural assets. The letter confirming this is provided in Annex V.

18.4.3 Intangible Cultural Heritage

Turkey has 10 elements registered on the UNESCO List of Intangible Cultural Heritage in Need of Urgent Safeguarding, which is composed of intangible heritage elements that concerned communities and States Parties consider require urgent measures to keep them alive. Three of these elements are relevant but not unique to the Kayseri Province:

- **Turkish coffee culture and tradition:** Turkish coffee combines special preparation and brewing techniques with a rich communal traditional culture. The tradition itself is a symbol of hospitality, friendship, refinement and entertainment that permeates all walks of life. An invitation for coffee among friends provides an opportunity for intimate talk and the sharing of daily concerns. Turkish coffee also plays an important role on social occasions such as engagement ceremonies and holidays; its knowledge and rituals are transmitted informally by family members through observation and participation. The grounds left in the empty cup are often used to tell a person’s fortune. Turkish coffee is regarded as part of Turkish cultural heritage: it is celebrated in literature and songs, and is an indispensable part of ceremonial occasions.

  - **Ceremonial Keşkek tradition:** Keşkek is a traditional Turkish ceremonial dish prepared for wedding ceremonies, circumcisions and religious holidays. Women and men work together to cook wheat and meat called ‘Keşkek’ in huge cauldrons, then serve it to the guests. The wheat is washed with prayers the preceding day, and then carried to a large stone mortar, to the accompaniment of music from the davul drum and zurna double-reed pipe. Towards noon, the strongest of the village youth are called to beat the Keşkek with wooden mallets, while the crowd cheers and zurna players perform musical pieces, announcing the thickening of the stew with a specific melody.

  - **Traditional Sohbet meetings:** Traditional Sohbet meetings play a crucial role in transmitting Turkish folk literature, folk dances and music, village plays as well as societal values. Turkish men meet regularly indoors, especially in winter, to discuss local social and cultural issues, safeguard traditions, and encourage solidarity, mutual respect and a sense of community. Meetings may include music, dances and plays, all enjoyed while consuming local dishes. A traditional Sohbet

---

meeting may last until the early morning. Meetings are open to men above the age of 15 or 16, regardless of ethnicity, religion or status, with the basic requirement that members be of honest families, be trustworthy and respectful of their elders, and not gamble or display public drunkenness. Members may be penalised with a fine for missing a meeting, except under extenuating circumstances. Mothers and wives encourage male members to attend because of the associated social and cultural benefits. Communities usually comprise five to thirty persons and are guided by leaders, appointed by election or proposed by elders. Members of the community all have equal rights and commitments. The Sohbet meetings fulfil an important educational function by transferring ethical values such as social justice, tolerance, benevolence and respect.

**Food and Wedding Ceremonies**

Develi is situated on a fertile plain at the foot of Mt. Erciyes. The climate and geography is suitable for animal husbandry, which has affected the development of local eating habits; pastırma\(^{22}\) and suçuk\(^{23}\) have a significant share in Develi’s economy.

Wedding ceremonies are among the most important of the living traditions of Develi. Still seen in the district capital of Develi and the surrounding villages, traditional wedding ceremonies take place in several stages. During focus group discussions with people from the neighbourhoods in the social study area including Zile, Yukarı Develi, Epçe, Yazıbaşı, Sarıca and Tombak, men and women both reported the importance of the traditional wedding practices undertaken in the Develi area. However, it was also noted that traditional practices are no longer undertaken at every wedding and instead, the youth wish to perform ‘western’ weddings at wedding halls. They described the traditional wedding which included şerbet içme, çit yüzük, pırtı görme, düğün törenlerinin başlaması, kına gecesi, gelinbaşi, güveybaşi and gerdek gecesi, havala\(^{24}\).

**Şerbet içme (Drinking of sherbert):** At the bride’s home, a drink called “şerbet” is prepared with water, sugar and sherbet dye, and served to the guests. In addition, a “şerbet sürahisi” (sherbet pitcher) is prepared for the groom and his friends.

**Çit yüzük (Engagement):** At the sherbet ceremony, it is decided what gold pieces (jewellery etc.) will be pinned to the bride, and the engagement gifts are bought. During the engagement ceremony, the ring is put on.

**Kına gecesi (Henna night):** Saturday afternoon the “henna night” begins, during which the bride’s hands are bound with henna. The women and men celebrate separately. The guests are served çerez (various nuts and dry fruits which here include roasted chickpeas, Russian olive fruits, raisins, peanuts and candies).

**Gelin aley (Bridal procession):** Late Sunday morning the bridal procession comes to take the bride to the groom’s house.

**Güvey başı:** On Sunday afternoon, the groom’s close friends take him to the hamam. Then they gather at one of their homes and celebrate with live music. Towards evening, there is a feast, which consists of soup, okra with meat, a vegetable dish made with in-season or dried vegetables, pilaf, compote, fruit and baklava.

**Havala:** On Monday, a party is held at the groom’s house for guests coming from his side of the family, and the mevlit is chanted. The bride serves yufka to the guests. The guests bring gifts known as “sungu” and the celebration is known as “havala.”.

---

22. Pastırma, pastırma, pastourma, basturma or basturma is a highly seasoned, air-dried cured beef of Anatolian origin, which is now part of the cuisines of the former Ottoman countries.

23. Sujuk, often spelled suucuk, is a dry, spicy sausage of Turkish origin which is eaten from the Balkans to the Middle East and Central Asia.

Funeral Ceremonies and Foods

During the women’s focus group discussions, several groups noted that any time there is a death in a home, relatives and close friends gather there. For 15 – 20 days, no food is cooked in that house; all food is brought by close friends and neighbours. They serve the people in the house and the guests, help with the housework, and prepare three meals. Breakfast consists of cheese, olives, preserves, molasses, tahini, çörek, el böreği, muska böreği and bazlama. The midday and evening meals may include yahni, pilaf, mantı, su böreği, and various vegetable dishes and sweets according to the season. On the 40 and 50-day anniversaries of the death, the mevlit\textsuperscript{25} is read. After the mevlit, the guests are served a pide\textsuperscript{26} with ground meat called civkılı.

Festivals

Yazibaşı Annual Rain Prayer: Takes place every April and May. An animal is sacrificed for God; and everybody in the neighbourhood attends along with executives from organizations operating within the village. The event takes place in a location close to the village called “Yukarı Çayırlık”. It has been undertaken since drought became more frequent, in the last 5 years, rain prayers have been undertaken 3-4 times.

Yazibaşı Village festival: Organised by village members and those who have migrated to other areas of the country. The aim of the festival is to strengthen the relationships between village population (present and past). The festival has not been organised for the last 2 years.

18.5 Impact Assessment

This section identifies and assesses impacts to the Project and social study area cultural heritage for the Project construction, operations and closure phases.

Summary of Impacts

Impacts on tangible cultural heritage may occur during the construction of the access road, water supply pipeline and powerline.

Impacts Scoped Out

Issues that have been scoped out of this assessment for this aspect are:

\begin{itemize}
  \item \textit{Increased disruption to, or accessibility of, tangible cultural heritage sites and theft or damage to cultural heritage resources in the EIA Permitted Area}
    \begin{itemize}
      \item Surveys have shown that there are no tangible cultural heritage sites of significance within the EIA Permitted Area and along the powerline route.
      \item Avoidance measures were used during initial project design to ensure that the EIA Permitted Area avoided tangible cultural heritage sites. If any are found, the OMAS Chance Finds Procedure (within the OMAS Cultural Heritage Management Procedure OMAS-HSEC-PRC-004) will be followed.
    \end{itemize}
  \item \textit{Use of intangible cultural heritage by the Project:}
    \begin{itemize}
      \item This has been scoped out as the Project is not considered to have an adverse impact on intangible cultural heritage as it is not unique to the social study area.
    \end{itemize}
\end{itemize}
18.5.1 Construction Phase Impacts and Mitigation Measures

Increased disruption to, or accessibility of, tangible cultural heritage sites and theft or damage to cultural heritage resources

Impact Assessment

<table>
<thead>
<tr>
<th>Impact</th>
<th>Increased disruption to, or accessibility of, tangible cultural heritage sites and theft or damage to cultural heritage resources</th>
</tr>
</thead>
<tbody>
<tr>
<td>Receptor</td>
<td>Low</td>
</tr>
<tr>
<td>Sensitivity²⁷</td>
<td></td>
</tr>
<tr>
<td>Impact Magnitude</td>
<td>Indirect, short term, localised and likely to occur. Medium impact magnitude</td>
</tr>
<tr>
<td>Significance</td>
<td>Minor adverse</td>
</tr>
</tbody>
</table>

Impact Mitigation

There are no known cultural heritage sites within the infrastructure corridors. However, chance finds and potential impacts to objects, sites or places of cultural heritage value may be caused during ground disturbing activities conducted during the construction phase. A Chance Finds Procedure (within the OMAS Cultural Heritage Management Procedure OMAS-HSEC-PRC-004) will be implemented as a mechanism to ensure that any new discoveries are appropriately documented and either: avoided, impact minimised or impact mitigated, as appropriate.

Avoidance was a key mitigation measure for the Project’s tangible heritage when the Project fence line was moved to avoid the Büyük Meşe Tepe archaeological site in the southwest of the site.

Residual Effects

Application of the mitigation hierarchy is anticipated to reduce the impact magnitude on archaeology in the study area, such that all are avoided by Project Activities within the fence line. After mitigation, the residual effect is considered to be negligible.

18.5.2 Summary of Impacts and Mitigation Measures

A summary of potential impacts and proposed mitigation measures as described above are summarised in Table 18-1 below.

²⁷ Sensitivity for social impacts, unlike environmental impacts that are linked to the quality and rarity of the receptor, is linked to the consequence of a change and whether a change would impair (or benefit) quality of life. “Very high” would seriously impair (or substantially improve) quality of life. “Low” would be a change from baseline conditions, but not impair or change the quality of life.
|--------|----------|----------------------|-----------------------|---------------------|-----------------------------|-------------------------------|--------------------------------|-----------------------------|
| Increased disruption to, or accessibility of, tangible cultural heritage sites and theft or damage to cultural heritage resources | Tangible Cultural Heritage sites within the infrastructure corridors | Low | Indirect Short term Localised Likely to occur | Medium | Minor adverse | * Avoidance of cultural heritage sites as part of project design  
* Mitigation through implementation of the Chance Find Procedure  
* Monitoring/“watching briefs” conducted at specific construction and other sites  
* Consultation with local communities related to cultural resources  
* Communication and cooperation with the Contractors and the Kayseri Museum and/or other appropriately qualified archaeological specialists.  
* The Cultural Heritage Management Plan 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. | Cultural Heritage Management Plan Stakeholder Engagement Plan Grievance Process | Negligible |
18.6 Monitoring Requirements

Monitoring requirements for cultural heritage are specified in Table 18-2 below.

**Table 18-2: Cultural Heritage Monitoring Requirements**

<table>
<thead>
<tr>
<th>Source Document</th>
<th>Monitoring Location</th>
<th>Parameters</th>
<th>Frequency</th>
</tr>
</thead>
</table>
| Stakeholder Engagement Plan OMAS-ESMS-SEP-PLN-001 | ▪ Community Relations Office  
▪ Communities | ▪ Stakeholder Engagement Register including records of cultural heritage monitoring record reporting, and engagement with topic experts  
▪ Grievance register  
▪ Commitments audit records  
▪ Survey results with key stakeholders | Ongoing and monthly reviews  
Six monthly reporting to communities for life of mine |
| Cultural Heritage Management Plan OMAS-ESMS-CH-PLN-001 | ▪ CR Office  
▪ Communities  
▪ Project Operations | ▪ Mine Plan records  
▪ Chance Find records  
▪ Reporting on avoidance, minimization, mitigation measures | Ongoing and monthly reviews  
Six monthly reporting to communities for life of mine |
| Contractor Management Framework OMAS-ESMS-CM-PLN-001 | ▪ Contractor office | ▪ ESMS and Chance Find Procedure  
▪ Chance Find records | Ongoing and monthly reviews  
Six monthly reporting to communities for life of mine |