

The Board of Executive Directors of IBRD / IDA
The World Bank
1818 H St. NW
Washington, D.C. 20433

safeguardconsult@worldbank.org

27 October 2015

Dear Sir / Madam,

**CIfA Response to Consultation on World Bank Draft Environmental and Social Framework:
Second Draft**

Thank you for the opportunity further to comment on this draft Framework.

The Chartered Institute for Archaeologists

The Chartered Institute for Archaeologists (CIfA) is the leading professional body representing archaeologists working in the UK and overseas. We promote high professional standards and strong ethics in archaeological practice, to maximise the benefits that archaeologists bring to society, and provide a self-regulatory quality assurance framework for the sector and those it serves.

CIfA has over 3,300 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

IfA's International Practice group provides a forum for archaeologists, historic environment and cultural heritage professionals working on international projects and initiatives (or based outside the UK and the Republic of Ireland), and advise IfA council on issues relevant to international practice of archaeological and cultural heritage management. This response has been informed by comments from members of that Group.

World Bank Draft Environmental and Social Framework: Second Draft

General

CIfA's predecessor (IfA) responded to the consultation on the first draft of the Bank's Environmental and Social Framework by letter dated 27 November 2014 (copy attached for ease of reference) in which it welcomed the World Bank's revision of its current set of

safeguard policies and its development of an Environmental and Social Framework. ClfA continues to support the development of this framework and to endorse the broad objectives of the World Bank in formulating proposed Environmental and Social Standard 8 (Cultural Heritage) *‘to protect cultural heritage from the adverse impacts of project activities and support its preservation; to address cultural heritage as an integral aspect of sustainable development; to promote the equitable sharing of benefits from the use of cultural heritage’* (World Bank Factsheet: Proposed Environmental and Social Standard 8: Cultural Heritage). ClfA is pleased to note that the second draft in many respects improves the original document, although some of the concerns raised in the Institute’s original response remain.

ClfA will not repeat the submissions made in that letter but asks that they be taken into account, where still relevant, as the Institute’s continuing views in considering the second draft. Further detailed comments are set out below.

Detailed Comments

ESS 8: Cultural Heritage

Page 127, paragraph 9

1. This paragraph should make clear that projects should not proceed if there are unacceptable cultural heritage objections which cannot be adequately mitigated or compensated, as is the case with the natural environment (see the last sentence of paragraph 18 of ESS6: *‘Certain adverse residual impacts cannot be offset, particularly if the affected area is unique and irreplaceable from a biodiversity standpoint. In such cases, the Borrower will not undertake the project unless it is redesigned to avoid the need for such offset, and to meet the requirements of this ESS’*).

Page 128, paragraph 10

2. Given the need for cultural heritage issues to be addressed by competent professionals, we would like to see the reference in paragraph 10 of the first draft to the requirement for the Borrower to retain competent professionals reinstated in the second draft.

Page 128, paragraph 11

3. We are pleased to see that paragraph 11 of the second draft expressly recognises the Borrower’s responsibility with regard to chance finds, but the last sentence should include a requirement *‘to investigate, record and report upon’* such finds.

Page 128, paragraph 12

4. In the first line of paragraph 12, the words *‘where necessary’* should be deleted as the involvement of cultural heritage experts should be the norm.

Page 130, paragraph 19

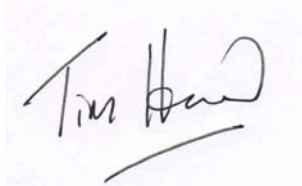
5. The opening of paragraph 19 is too narrowly focused and should refer to '*known or potential evidence*' of past human activity.

Page 130, paragraph 20

6. The requirements in paragraph 20 with regard to archaeological material should be subject to the same footnote (footnote 15) as paragraph 22 on built heritage. The reference in footnote 15 to Good International Industry Practice is particularly important.

CIa and its International Group would welcome the opportunity to work with World Bank and other stakeholders further to develop the cultural heritage content of the draft Framework. In the meantime, if there is anything further that I can do to assist please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Tim Howard', with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch
Senior Policy Advisor