

**SAGANAK ENERJİ**

**SAGANAK ENERJİ YATIRIM  
URETİM VE TICARET A.S.**

**KANDIRA WIND POWER PLANT**

**CULTURAL HERITAGE  
MANAGEMENT PLAN**

**DECEMBER 2020**

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## REVISION HISTORY

Ver	Date of Issue	Issue Reason	Description of Change	Prepared by	Approved by
0	02.10.2020	First submission	-	OO	HC
1	30.12.2020	Incorporation of TKYB comments	Chapter 1 Section 2.2	OO	HC

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## ABBREVIATIONS

<b><u>AIIB</u></b>	<b><u>Asian Infrastructure Investment Bank</u></b>
<b>EHS</b>	Environmental, Health, and Safety
<b>ESIA</b>	Environmental and Social Impact Assessment
<b><u>ESF</u></b>	<b><u>Environmental and Social Framework</u></b>
<b><u>ESS</u></b>	<b><u>Environmental and Social Standards</u></b>
<b>GIIP</b>	Good International Industry Practices
<b>HSE-Q</b>	Health, Safety, and Environment - Quality
<b>IFC</b>	International Finance Corporation
<b>IFIs</b>	International Finance Institutions
<b>KPI</b>	Key Performance Indicator
<b>OHS</b>	Occupational Health and Safety
<b>Plan or CHMP</b>	Cultural Heritage Management Plan
<b>PPF</b>	Project Presentation File
<b>Project</b>	Kandira Wind Power Plant
<b>PRs</b>	Performance Requirements
<b>PSs</b>	Performance Standards
<b>Saganak Owner</b> or <b>Project</b>	Saganak Enerji Yatırım Üretim ve Ticaret A.Ş.
<b>WPP</b>	Wind Power Plant
<b>UNESCO</b>	United Nations Educational, Scientific and Cultural Organization

## **1. PURPOSE AND SCOPE**

The Cultural Heritage Management Plan (“the Plan” or “CHMP”) has been developed in accordance with Saganak Enerji Yatırım Üretim ve Ticaret A.Ş (hereinafter referred to as “Saganak” or “the Project Owner”) policies, with the commitments undertaken by Saganak in the Environmental and Social Action Plan (ESAP) prepared for the Kandira Wind Power Plant (WPP) Project (“the Project”), with Turkish regulatory framework, with International Finance Corporation (IFC) Performance Standards (PSs) (in Particular PS8), with IFC General and Sector Specific Environment, Health and Safety (EHS) Guidelines and Asian Infrastructure Investment Bank’s (AIIB) Environmental and Social Framework (ESF). Where no national regulation, IFC standard/guideline or AIIB standard applies, the Plan considers the adoption of Good International Industry Practices (GIIP).~~Where no national regulation or IFC standard/guideline applies, the Plan considers the adoption of Good International Industry Practices (GIIP).~~

### **1.1 Purpose**

The purpose of the Plan is to avoid significant adverse impacts to cultural heritage and to describe the provisions for managing chance finds through a chance find process which will be applied in the event that cultural heritage is subsequently discovered.

### **1.2 Scope**

The plan includes guidelines and minimum requirements for Saganak and also its construction contractors for defining its own chance find procedures appropriate to the nature and scale of the works to be conducted during the Project construction phase.

This Plan will be updated as and when necessary. The scope of the Plan includes following aspects:

- Purpose and scope
- Legislative requirements and standards
- Roles and responsibilities
- Cultural heritage management
- Monitoring and reporting
- Training
- Review and update

## **2. LEGISLATIVE REQUIREMENTS and STANDARDS**

### **2.1 National Legislation**

Turkish Legislation that the Project will comply with laws/regulations/standards below:

- Law on Protection of Cultural and Natural Assets No. 2863 dated 21/07/1983 as amended by Law No. 5226 dated 14/07/2004 (Official Gazette No: 18113, 23/07/1983)
- Regulation on the Fixation and Registration of Real estate Cultural and Natural Assets that need to be Protected (Official Gazette No: 28232, 13/03/2012)
- European Convention on the Protection of the Archaeological Heritage (revised) – Malta Convention (1969,1992)
- European Cultural Convention (1954)
- Convention for the Protection of the Architectural Heritage of Europe (1985)
- Convention concerning the Protection of World Cultural and Natural Heritage (UNESCO) (1972)

### **2.2 International Standards**

Applicable International Finance Institutions (IFIs) standards and guideline requirements for the management of cultural heritage are provided in the following references:

- IFC Performance Standards (particularly PS8)
- IFC General Environmental, Health, and Safety (EHS) Guidelines
- IFC General EHS Guidelines: Construction and Decommissioning
- AIIB Environmental and Social Framework
- AIIB Environmental and Social Standards (particularly ESS1)

### **3. ROLES AND RESPONSIBILITIES**

The responsibilities regarding the protection program are divided between the Saganak staff and contractors. The parties responsible for the implementation of the commitments of this Plan are described below:

#### **Ministry of Culture and Tourism**

- Responsible for culture and tourism affairs in Turkey.

#### **Kocaeli Regional Preservation Board of Cultural Assets**

- Responsible for the decision making of any intervention on the chance find site

#### **Kocaeli Museum Directorate**

- Responsible to provide experts for the sites within 24 hours after being informed
- Responsible for the excavation of chance find areas. The directorate will follow the directions and decisions of Kocaeli Regional Preservation Board of Cultural Assets.

#### **Project Owner**

- Responsible for the monitoring of the implementation of this Plan and Chance Finds Procedure attached to it
- Responsible for the supervising the cultural heritage responsible staff (i.e. HSE-Q Expert) for the monitoring of cultural heritage and archaeological protection activities
- Responsible for the recording and monitoring all chance finds through a formal system

The key roles and responsibilities in Saganak's organizational structure for the implementation of this Plan are given below:

#### **Managing Director**

- Owner and confirmatory of this Plan.
- Ensures sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of this Plan.

#### **Project Manager**

- Ensures that relevant activities are carried out in accordance with this plan and related procedures.
- Takes appropriate actions to address major nonconformities based on audit reports, performance reports, and on HSE-Q Expert's proposed approach.
- Coordinates with all parties for effective implementation of this Plan

#### **Administrative Affairs Manager**

- Ensures that all employees are aware of, and appropriately trained on the implementation of this Plan
- Includes cultural heritage into "Code of Conduct" induction training

### **Construction/Operation Manager**

- Implements and improves this Plan
- Ensures that all contractors and subcontractors are aware of, and appropriately trained on this Plan
- Records the spatial coordinates of all chance finds

### **HSE-Q Expert**

- Ensures that this Plan is up to date and appropriate to the nature and scale of Saganak
- Ensures that this Plan is implemented effectively by the contractors and subcontractors
- Ensures that action/measures and monitoring activities directly under Saganak responsibilities are carried out timely and adequately according to this procedure
- Proposes to Saganak management, if necessary, amendments and/or updates to this plan and issuing plan revisions
- Programs inspections and audit activities to ensure the correct implementation of this plan and of the construction contractor's plan
- Addresses non-conformities through the definition of preventive/corrective actions
- Brings major non-conformities immediately to the attention of Saganak management
- Collects, organizes, and reviews monitoring data and performance monitoring reports and provides summary results of such reports to Saganak management, to stakeholders and to the Lenders

### **Community Liaison Officer**

- Coordinates with organizations and other stakeholders

### **Construction Contractor**

- Ensures sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of this Plan.
- Ensures the effective implementation of this procedure by issuing its own procedures addressing, detailing and customizing specific actions, measures and monitoring activities under construction contractor's responsibility.
- Provides relevant monitoring data and monitoring reports to Saganak as indicated in Reporting section of this Plan.
- Stipulates Saganak's policies and standards to any subcontractor for duly implementing requirements.



## **4. CULTURAL HERITAGE MANAGEMENT**

### **4.1 General Management Criteria**

As stated in the national Project Presentation File (PPF) report, there are no cultural heritage, natural assets, archeological site and protected areas in the Project area and its close vicinity. Correspondences received from Kocaeli Regional Preservation Board of Cultural Assets also stated that there are no officially registered cultural heritage, natural site and natural asset are located within the Project area. Therefore, it is anticipated that the Project will not have any impacts on officially registered cultural heritage, since there are none in the Project area. However, a chance find is still possible as in every project that involves earthworks.

In the development of this Plan, the following commitment given in the Project's PPF Report is taken as foundation:

*“If any cultural heritage, natural asset, archeological site or protected area is detected during the works to be carried out within the scope of the project activities, the works will be stopped and the relevant authorities will be informed immediately.”*

### **4.2 Specific Management Methods and Mitigation Measures**

In addition to the measures defined in PPF of the Project and presented in the previous section the following table details the management methods and mitigation measures/actions identified in case of previously unknown or expected cultural heritage (e.g. archaeological findings) is encountered unexpectedly in the construction phase.

For each method and measure/action identified, the table shows:

- The identification code (ID)
- The reference (or source) documents (i.e. EIA, Turkish Regulations and permits, IFC PSs and EHS Guidelines, AIIB ESSs, or other GIIP)
- Frequency/timing of the measure/action, as applicable
- The related responsibility for implementing the measure/action.

Table 1. Management Methods and Mitigation Measures

ID.	REFERENCE	MITIGATION ACTION/MEASURE DESCRIPTION	FREQUENCY/ TIMING	TARGET/ ACCEPTANCE CRITERIA	RESPONSIBILITIES
1	Law No. 2863 dated 21/07/1983 (as amended) IFC PS8	Should an <b>archaeological and cultural property be found</b> on the Project Site during excavation works, all the construction activities shall be stopped and the Kocaeli Museum Directorate will be informed immediately.  Further construction activities will be conducted along with the <b><u>instructions of the authorities</u></b> .  In any case no chance find will be disturbed further until an assessment by competent professionals is made in agreement with the authorities.	When a chance find occurs and then ongoing	Full compliance	Construction Contractor to inform Saganak  Saganak to contact the authority
2	Law No. 2863 dated 21/07/1983 (as amended)	<b>Constructions and physical interventions will not be allowed on the protected and cultural assets.</b> Substantial repair, construction, installation, drilling, partial or complete demolition, burning, excavation or similar works will be considered as construction and physical intervention.	When a find occurs and then ongoing	Full compliance	Saganak Construction Contractor
3	IFC PS8	In case of previously unknown archeological finds are encountered the following measures will be put in place, consistently with the instruction given by the authorities: <ul style="list-style-type: none"> <li>• record keeping and expert verification procedures,</li> <li>• chain of custody instructions for movable finds, and</li> <li>• clear criteria for potential temporary work stoppages that could be required for rapid disposition of issues related to the finds.</li> </ul>	When a find occurs and then ongoing	Full compliance	Construction Contractor to report and take measures  Saganak to control and contact the authority  Authority
4	IFC PS8	In case of previously unknown archeological finds are encountered the Affected Communities will be consulted as part of the Stakeholder Engagement Plan (SEP), to incorporate into the decision-making process the views of the Affected Communities.	When a find occurs and then ongoing	Full compliance	Saganak
5	IFC PS8	In case of previously unknown archeological finds are encountered the Cultural Heritage item will be managed according to IFC PS8.	When a find occurs and then ongoing	Full compliance	Saganak Construction Contractor Authorities

### **4.3 Chance Finds Procedure**

In case of any chance find during the lifetime of the Project, including works to be performed for the auxiliary facilities, the following actions will be executed.

1. All the work will be stopped at the location of the chance find.
2. HSE-Q Expert will be immediately informed.
3. HSE-Q Expert will establish a temporary buffer zone around the chance find location using security tapes.
4. Entrance of staff to the buffer zone will be prohibited.
5. Construction/Operation Manager will take the spatial coordinate of the chance find location and inform Kocaeli Museum Directorate.
6. Kocaeli Museum Directorate representatives will mobilize to site within 24 hours of notification.
7. The security of the chance find location will be ensured by the Project security personnel until the arrival of Kocaeli Museum Directorate representatives.
8. Kocaeli Museum Directorate representatives will assess findings and determine the significance of the find and will inform Construction/Operation Manager on the scope of the resulting investigation.
9. Construction/Operation Manager will be informed of actual time delay.
10. Construction/Operation Manager will fill out the Chance Find Form given in the Annex-1 of this Plan.

## **5. TRAINING**

All personnel, especially the operators of construction machinery and those working on earth movements and excavations, are to be inducted on the identification of potential heritage items/sites and the relevant actions for them with regards to this procedure during the Project induction and regular toolbox talks.

HSE-Q Expert performs the first training before the construction works starts, and repeats it whenever a new operator/worker is recruited. The schedule will be determined by HSE-Q Expert and all training records (e.g. attendance sheets) will be kept.

## **6. MONITORING AND REPORTING**

The correct implementation of this Plan is verified through internal inspections and audits. Internal auditing will address:

- The correct implementation of this Plan;
- The correct development and implementation of construction contractor's procedure;
- The correct and timely implementation of an auditing and review system by the construction contractor;
- Each of the points indicated in the Table 1 (mitigation actions/measures) of this Plan.

During the inspections, Saganak's HSE-Q Expert shall address in particular:

- Availability of records on any archeological findings;
- Construction contractor and subcontractors selection process in place.

Evidences and results of the inspection and audit activities are included in the audit reports and in the "Non-conformity and Preventive/Corrective actions" records.

Saganak management reviews results of inspections and audits and the progress of the Preventive/Corrective actions and takes additional appropriate actions, if necessary.

Evidences of the implementation of the mitigation actions/measures (detailed in Table 1 and Chapter 4.3 of this Plan) and related results are collected through inspection and auditing activities as detailed in this section of this Plan; these evidences are described in the audit reports:

- Main figures regarding archeological awareness information provided to workers' (Saganak/Construction Contractor);
- Communication of the data to Saganak;
- Collection and recording of the data (Saganak).

In the monitoring, auditing and inspection processes, Saganak might use archaeological consultant services. In such case, HSE-Q Expert will request approval of Construction/Operation Manager.

These data together with the results of the inspection and audit activities will be summarized in a report on a six monthly basis that will be made available to stakeholders. This report constitutes the basis for the monitoring report to be made available for the Lenders.

## **7. REVIEW AND UPDATE**

This Plan is a living document and the responsibilities, procedures and compliance actions shall be updated as required (e.g. after a change in related legislation or insufficiencies in the implementation of this plan). It is the responsibility of the Saganak's HSE-Q Expert to be fully aware of its contents, to provide relevant training to staff and to ensure that procedures are being implemented to achieve compliance with this Plan. Contractors' HSE-Q personnel will also be responsible of day-to-day implementation of the Plan and to ensure compliance with Project standards.

Any revisions to this Plan will be distributed accordingly in order to ensure that all Project staff has access to the latest version of this Plan.

**ANNEX-1: CHANCE FIND FORM**

<b>CHANCE FIND FORM</b>				
<b>Chance Find No</b>				
<b>Date of the Find</b>				
<b>Coordinates of the Find Location</b>				
<b>Description of the Find</b>				
<b>Material</b>				
<b>Object Geometry</b>				
<b>Photos</b>				
<b>Name and the Title of Encounter</b>				
<b>Statement of the Encounter</b>				
<b>Signature</b>	<table border="0"> <tr> <td style="text-align: center;">Encounter</td> <td style="text-align: center;">HSE-Q Expert</td> <td style="text-align: center;">Construction/ Operation Manager</td> </tr> </table>	Encounter	HSE-Q Expert	Construction/ Operation Manager
Encounter	HSE-Q Expert	Construction/ Operation Manager		