



December 18, 2014

Mr. Rick Mire
Chairman, IPIECA
5th Floor
209-215 Blackfriars Road
London
SE1 8NL
United Kingdom

RE: IPIECA API OGP Oil and gas industry guidance on voluntary sustainability reporting

Dear Mr. Mire,

The Society for American Archaeology (SAA) is pleased to present the following comments on the draft 2015 update to the second edition of the industry guidance on voluntary and sustainability reporting. We appreciate the IPIECA's willingness to take a leadership role on this very important issue.

SAA is an international organization that, since its founding in 1934, has been dedicated to the research about and interpretation and protection of the archaeological heritage of the Americas. With more than 7,000 members, SAA represents professional archaeologists in colleges and universities, museums, government agencies, and the private sector. SAA has members in all 50 states as well as many other nations around the world.

In addition to valuable natural resources, America's landscape contains an enormous number of archaeological sites, both known and as-yet undiscovered. They are the physical traces of the numerous peoples who have called North America home over many thousands of years. They tell the story of our past. Once an archaeological site is disturbed or destroyed, however, the information it contains is lost forever. It is vital that all reasonable precautions are taken to protect these irreplaceable cultural resources. In general, we are concerned that the guidance document makes few, if any, references to such sites and materials, and strongly believe that the scope and effectiveness of the draft will be greatly improved by making archaeological and cultural resources an explicit area of concern for stakeholders to focus upon. It is from this perspective, and in conjunction with the input of the Gas and Preservation Partnership, that we offer the following specific comments.

Please note: suggested changes to the text are in italics.

- Engaging Stakeholders (page 7): add language which specifies that relevant documents on cultural resources (including Memoranda Of Understanding, Memoranda Of Agreement, and Programmatic Agreements) are sources of information to be reviewed by stakeholders
- Stakeholder Mapping (page 7): re-word this section to specifically reference professional organizations, local non-profits, and indigenous governments and communities
- Articulate Vision and Strategy (page 8): add "environmental *and social/cultural compliance*"
- Define Sustainability (page 8): add "safeguard the environment *and cultural resources*"
- Reveal Vision (page 8): add "care for the environment *and cultural resources*"
- Fig. 3 (page 9): add "to impact people, *the environment or cultural resources*"
- Impact on Local Communities box (page 15): to dot point 2, add "*the local environment, cultural resources, community health*"
- Fig. 4 (page 11): add new bullet to "socio-environment" list: "*cultural resources impact*"
- Spills box (page 19) paragraph 2: add "could result in environmental *or cultural impacts* or harm to people"

- E8 / Purpose (page 47): add "acid rain that can affect human health or damage flora and fauna *and cultural resources*"
- E9 / Purpose (page 49): add "contaminate soil, harm species *and cultural resources* and affect livelihoods"
- E10 / Purpose (page 52): add "to help minimize risks to people, the environment *and cultural resources*"
- E11 / Purpose (page 54): add "protecting the environment, *cultural resources*, and the safety"
- E11 / Scope (page 54): in paragraph 2 add "to meet defined environmental *and cultural resource* management standards"
- HS4 / Product Stewardship (page 65): this section needs a specific reference to Cultural Resource Management, because pollution can damage both tangible and intangible cultural resources
- 5.3 / Guidance (page 67): add "very severe environmental, *cultural resources*, social"
- HS5 / Purpose (page 68): add "widespread environmental, *cultural resources* and/or significant property"
- Summary Table (page 71): add "*cultural resource management*" in the Communities and Society section
- SE1 / Scope (page 73): rework the last sentence to read "*Local community*' includes those groups of people who live or work sufficiently nearby to be potentially impacted by the company's operations, including those within the zone of visual, auditory, seismic, and/or water table impacts, and is not restricted to 'fence-line' neighbors of a facility."
- SE1 / Common reporting elements (page 74): add a third bullet stating "*assessing and addressing impacts upon the affected community's archaeological, historic and cultural sites*"
- SE1 / Other reporting elements (page 74): add a third bullet stating "*Describe efforts to identify archaeological, historic and cultural sites potentially impacted by the company's activities, and to consult with the affected communities regarding the significance of such sites and acceptable approaches to ensuring their preservation*"
- SE2 / Scope (page 75): add "collective attachment to specific lands *and/or cultural resources*" to point 3
- SE3 / Scope (page 77): add "*and to cultural* and economic displacement (i.e. loss of *cultural and/or* economic assets or access to assets that leads to separation or disconnection from *cultural resources and/or* loss of income sources"
- SE7 / Scope (page 82): add "(e.g. skills training, health, society and environment, *cultural resources*)"
- Glossary (page 119): add "cultural resources (aka cultural heritage): (i) tangible forms of cultural heritage, such as tangible moveable or immovable objects, property, sites, structures, or groups of structures, having archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values; (ii) unique natural features or tangible objects that embody cultural values, such as sacred groves, rocks, lakes, and waterfalls; and (iii) certain instances of intangible forms of culture that are proposed to be used for commercial purposes, such as cultural knowledge, innovations, and practices of communities embodying traditional lifestyles."ⁱ

We appreciate your time and consideration of this important matter, and look forward to working with you in the future.

Sincerely,



Jeffrey H. Altschul, Ph.D., RPA
President

ⁱ Definition taken from the International Finance Corporation Guidance Note 8: Cultural Heritage (January 1, 2012)