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 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"
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

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