



SOCIETY FOR AMERICAN ARCHAEOLOGY

The Society for American Archaeology's Comments on the Asian Development Bank's Summary of the Analytical Study for the Safeguard Policy Review and Update: Cultural Heritage

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The Society for American Archaeology (SAA) supports the Asian Development Bank's (ADB) undertaking of an analytical study and update of its Safeguard Policy Statement (SPS), including for cultural resources, and for providing a summary of the Safeguard Policy Review and Update (SPRU) for consultation purposes. The protection of cultural resources is an issue of great priority to the world, and must be recognized as such by Multilateral Funding Institutions (MFI's) such as the ADB.

The SAA is an international organization that, since its founding in 1934, has been dedicated to research about and interpretation and protection of the archaeological heritage of the Americas and the world. With nearly 7,000 members, the SAA represents professional and avocational archaeologists, archaeology students in colleges and universities, and archaeologists working at tribal agencies, museums, government agencies, and the private sector. The SAA has members throughout the United States, as well as in many nations around the world.

Substantial progress has recently been made in safeguarding cultural heritage by other MFI's, including the World Bank (WB) and Inter-American Development Bank (IADB). It is greatly encouraging to see the ADB doing the same. The SAA offers the following comments, arranged in order corresponding to numbered paragraphs contained in the Preliminary Key Findings section of the SPRU Summary, followed by other conclusions:

14. We recognize the Findings' observation that archaeological investigation is not explicitly mentioned in the SPS and strongly recommend that the "lack of granularity in detail" regarding the sorts of surveys and assessments needed (including but not limited to archaeological ones) be remedied.

16. We support the Findings' conclusion of the need for the inclusion of a rationale for protecting cultural heritage in the updated SPS. Cultural heritage is one important pathway local and descendant communities use to transmit social norms and mores to the next generation. Loss of cultural heritage is not simply the loss of buildings, monuments, and artifacts, but also the loss of the connections people use to construct and pass on their social identity and ideology. Our use of "protection" in this context encompasses preservation as is (or in situ for archaeology) or managed change incorporating appropriate investigation with analysis and public presentation of the results. Study of archaeological heritage, in particular, represents the only pathway for research to document some important parts of the human experience and to gain knowledge that complements historical documents and oral traditions. We agree that *"The WB also establishes four separate categories to detail tangible cultural heritage, which provides further clarity, leading to improved field and desk methods whilst also ensuring correct specialists are allocated to each project. The WB approach is particularly helpful for borrowers that are unfamiliar with the methods of cultural heritage study and protection."*

17. We urge that the issue of Intangible Cultural Heritage be explicitly addressed in the updated SPS, in a manner that reflects the approaches taken by other organizations such as the WB and that encompasses more than just its commercial uses.

18. We urge that the protection of Indigenous People's cultural heritage, both tangible and intangible, be addressed not only in the Indigenous Peoples section of the SPS but also in the cultural heritage section of the environmental section of the SPS so as to connect these two parts of cultural heritage protection more clearly and consistently while fully recognizing the special concerns raised by the cultural heritage of Indigenous Peoples. This would facilitate the development of a "separate standard that addresses all relevant areas and forms of tangible and intangible cultural heritage" and "additional supporting technical guidance" called for in paragraph 24, both of which we strongly support. We recommend consistent use of the term *cultural heritage* rather than *cultural resources* in both the environmental and Indigenous Peoples' safeguards.

21. We agree with the recognition in the Summary that "ensuring that EMP requirements [Field Surveys, Chance Find Procedures, and Contractor Implementation of Protection Measures] cascade down and are fully implemented by all subcontractors is an acknowledged challenge, which could potentially lead to cultural heritage impacts that, in turn, can lead to the erosion of community support." We provide the same recommendation here that we provided the WB: *"The establishment of a Cultural Heritage Preservation Fund to provide financial resources to countries that lack strong cultural heritage frameworks. The major impediment...is, in many cases, the lack of viable cultural heritage protection infrastructure and personnel in applicant countries. Following the model of the US Historic Preservation Fund, the World Bank should establish a fund that applicant countries can use to train cultural heritage specialists in technical aspects of cultural heritage management and establish strong regulatory controls. The bank should also facilitate training opportunities for applicant countries with agencies such as the US National Park Service or the German Archaeological Institute, which have foreign assistance programs."*

26. We enthusiastically agree that it is wise to "consider cultural heritage as a project opportunity and to not be dissuaded from projects that may incur archaeological finds."

Additional points for ADB consideration:

- In the considerable experience of our members, who have worked on many MFI projects around the world, MFI specialists assigned to evaluate project impacts, the scope of environmental and social assessments, and the capacity of country systems often do not have cultural heritage, and especially archaeological, expertise. In the past, this has meant that cultural heritage, and particularly archaeological heritage, has often been poorly served by MFI policies and procedures. It is crucial, therefore, that the ADB have permanent in-house heritage professionals on staff to guide the implementation of the ADB's cultural heritage standards.
- Independent peer review must be included in the revised SPS. It is the only mechanism by which the ADB, the applicant, regulatory government agencies, local and descendant communities, stakeholders, and other interested parties can be assured that the cultural heritage safeguard plans have been adequately implemented. Peer reviewers must be accredited or registered cultural heritage experts (members of professional associations) who subscribe to internationally and professionally accepted codes of conduct and standards of research performance and agree to be held accountable to those principles.