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# CEYHAN PROPANE DEHYDROGENATION - POLYPROPYLENE PRODUCTION AND JETTY PROJECT

## CULTURAL HERITAGE MANAGEMENT PLAN (ANNEX-N)

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FEBRUARY 2023  
ANKARA

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# CEYHAN PROPANE DEHYDROGENATION - POLYPROPYLENE PRODUCTION AND JETTY PROJECT

## CULTURAL HERITAGE MANAGEMENT PLAN

Version	Revision	Date	Prepared By	Quality Management By	Checked By	Approved By
Draft	A.0	December 2021	Şeyma Geyik (2U1K)	Esra Okumuşođlu (2U1K)	Günał Özenirler (2U1K)	D. Emre Kaya (2U1K)
	A.1	August 2022	Şeyma Geyik (2U1K)	Esra Okumuşođlu (2U1K)	Günał Özenirler (2U1K)	D. Emre Kaya (2U1K)
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### CLIENT:

Ceyhan Polipropilen Üretim A.Ş  
Portakal Çiçeđi Sokak No:33 Yukarı Ayrancı  
Çankaya - Ankara / Türkiye  
☎: +90 (312) 840 10 00  
☎: +90 (312) 442 58 16

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## LIST OF ABBREVIATIONS

<b>CHMP</b>	Cultural Heritage Management Plan
<b>EBRD</b>	European Bank for Reconstruction and Development
<b>ICOMOS</b>	International Council of Monuments and Sites
<b>IFC</b>	International Finance Corporation
<b>IFA</b>	Institute of Field Archaeologists
<b>No</b>	Number
<b>UNESCO</b>	United Nations Educational, Scientific and Cultural Organization

## 1. INTRODUCTION

Ceyhan PDH-PP Project (Project) has carried out an impact assessment for cultural heritage within the project area in line with local legislation, IFC PS8, and EBRD PR8. The purpose of this Cultural Heritage Management Plan (CHMP) is to **protect cultural heritage** within the scope of the Project and to minimize possible project impacts.

The impact mitigation on the potential and existing cultural heritage sites within the Project impact area is possible by developing and implementing a management plan. Therefore, the construction activities within the scope of the Project should be conducted in compliance with this management plan.

The SPV managing the Terminal Facility, which is considered as the associated facility for the Project, will develop and implement its own environmental and social management plans and procedures, including the Cultural Heritage Management Plan and Chance Find Procedure.

## 2. SCOPE

This Cultural Heritage Management Plan applies to all project activities that have the potential to cause an impact on cultural heritage. This includes especially all construction activities of the project and cultural protection measures, such as the Chance Find Procedures applicable for the Project.

### 2.1. Sources of Impact

Phase	Description of Activity	Potential Receptors that may be Affected by the Activities
Land preparation phase	<ul style="list-style-type: none"> <li>• Removal of vegetation and/or trees</li> <li>• Installation of fencing</li> <li>• Traffic movements (vehicles and staff)</li> </ul>	<ul style="list-style-type: none"> <li>• Architectural Heritage</li> <li>• Archaeological Sites</li> <li>• Other Archaeological/Historical Assets</li> </ul>
Project construction phase	<ul style="list-style-type: none"> <li>• Topsoil stripping</li> <li>• Blasting</li> <li>• Excavations and quarry/borrow site operations, etc.</li> <li>• Construction traffic movement</li> <li>• Siting of construction sites and other Project/associated facilities</li> <li>• Piling</li> <li>• Landscaping/ earth-mounding</li> <li>• Waste disposal including excess excavated materials</li> <li>• Structures, installation features (signage, fencing, etc.)</li> <li>• Installation of lighting scheme</li> <li>• Presence of workforce</li> <li>• Leaks and spills</li> </ul>	

### 3. OBJECTIVES

The general objectives of this Management Plan are to:

- Outline the applicable legislation and standards with regards to the protection of cultural heritage;
- Identify the potential sources of impact on cultural heritage;
- Establish the approach and procedures to be adopted by the Contractor for managing and mitigating impacts to cultural heritage during the construction phase of the Project;
- Define roles and responsibilities;
- Define monitoring and reporting procedures;
- Define training requirements;

## 4. LEGISLATION FRAMEWORK

In this section, the legislation framework related to the management of cultural heritage is summarized.

### 4.1. Local Laws and Legislation

In Türkiye, the movable and immovable cultural and natural assets are under protection as dictated by the “**Law on Preservation of Cultural and Natural Assets**”, **2863**, which was published in the Official Gazette numbered 18113 and dated 23 July 1983. The cultural and natural heritage, which is protected by the aforementioned Law, are identified as:

- Natural properties which require protection and immovable assets which were built before the end of the 19<sup>th</sup> century;
- Any immovable cultural asset constructed after the end of the 19<sup>th</sup> century but categorized as “a significant asset which requires preservation” by the Ministry of Culture and Tourism;
- Immovable cultural assets located within the boundaries of Protection Sites; Structures, buildings or places that have witnessed significant historical events during the Turkish Independence War or the foundation of the Turkish Republic, regardless of their period and registration status; and all dwellings and buildings that have been used by Mustafa Kemal ATATURK without considering their period of construction or registration status.

In addition to Law no: 2863 on Preservation of Cultural and Natural Assets, there are some regulations and principle decisions governing the management of cultural and natural assets. According to the Principle Decision no: 658 taken on November 5th 1999, on “Archaeological Sites, Conditions of Protection and Usage”, the archaeological sites are classified into three main categories:

**1st Degree Archaeological Sites:** Areas requiring highest level of protection, with the exception of scientific excavations aiming their protection. Neither construction nor development are allowed in these sites. All kinds of construction, excavation, and modification activities are prohibited within the boundaries of these sites. However, for exceptional cases such as the necessity for infrastructure construction, Regional Councils may permit such activities based on the approval of the relevant museum directorate and the head of the scientific excavation team

**2nd Degree Archaeological Sites:** They should be preserved based on the conditions of protection and utilization set by the Regional Councils. Additional construction is prohibited. Similar to the 1st Degree Sites, for exceptional cases such as necessity for infrastructure construction among others, Regional Councils may permit such activities based on the approval of the relevant museum directorate and the head of the scientific excavation team.



**3rd Degree Archaeological Sites:** Lowest level of protection area. Construction is permitted based on the decisions of Regional Councils. Before applying for a construction permit, test pit excavations should be conducted and the outcomes of these excavations should be reviewed by the relevant museum and, if present, the head of the scientific excavation team. Reviews should be submitted to Regional Councils. The Councils may ask for extension of the scope of test pits before taking any decision.

Furthermore, Implementation Guidelines for Field Surveys, Test Pits and Excavation Works on Cultural and Natural Assets (Ministry approval number 94949537-160.99-51264, dated 13.03.2013) define the procedures for salvage excavations, archaeological test pits and other studies.

#### 4.2. International Standards

International Finance Corporation (World Bank Group) policy on tangible and intangible cultural heritage is set out in Performance Standard 8 (PS 8). The objectives of PS 8 are:

- To protect cultural heritage from the adverse impacts of project activities and support its preservation.
- To promote the equitable sharing of benefits from the use of cultural heritage.

The European Bank for Reconstruction and Development (EBRD) policy on tangible and intangible cultural heritage is set out in Performance Requirements 8 (PR8). The objectives of PR 8 are:

- Identify and assess potentially significant, existing and future, adverse environmental and social impacts associated with the Client's current operations and the Project;
- Assess compliance with applicable laws and EBRD's Environmental and Social Policy (2019);
- Determine the measures needed to prevent or minimise and mitigate the adverse impacts;

Identify potential environmental and social opportunities, including those that would improve the environmental and social sustainability of the Project and the current operations. The cultural heritage findings within the project impact area that were given as Annex 1-1 of this plan.

## 5. ROLES AND RESPONSIBILITIES

Contractor will be responsible for the preparation and implementation of the environmental and social impact assessment-based management plans, which are project specific. These plans shall be practical, detailed procedures for use in the field. Contractor will ensure the implementation of the commitments stated in the ESIA, project specific plans and also shall comply with all relevant project standards, statutory requirements, permit and licence conditions and secure all applicable permits and licences.

### 5.1. Management of Cultural Heritage

The basic definitions regarding the management of cultural heritage are given in the following bullets:

- Ministry of Culture and Tourism is the responsible authority.
- Adana Museum Directorate are responsible to provide experts for the sites as soon as possible after being informed and to officially identify the Chance Find (described in Annex O). Museum Directorate are responsible for the excavation of chance find areas. The Museum Directorate will follow the guidelines and decisions of the Regional Council for the Conservation of Cultural Property (Table 1).

**Table 1.** Cultural Heritage Authorities Responsible in the Province Crossed by the Project

Project Related Regional Council for the Conservation of Cultural Property	Province	Contact Information
Adana Regional Council for the Conservation of Cultural Property	Adana	Tepebağ Mah. 27044 Sokak No:5 01010 Seyhan / ADANA Phone: (0322) 352 67 42 - (0322) 359 57 52 Fax: (0322) 352 67 42 e-mail: adanakurul@ktb.gov.tr
Project Related Museum Directorate	Province	Contact Information
Adana Museum	Adana	Döşeme Mahallesi, Ahmet Cevdet Yağ Bulvarı No: 7, Seyhan / ADANA Phone: (0322) 454 38 55-57 Fax: (0322) 454 38 56 e-mail: adanamuzesi@ktb.gov.tr

- Regional Council for the Conservation of Cultural Property are the only decision maker on any intervention, which would be made on the site after the chance find.
- Contractor is responsible for the management of all cultural heritage assets during the construction phase of the Project and implementation of related management plan and the chance find procedure.
- Contractor should mobilize cultural heritage/archaeological monitoring expert/s for the monitoring of ground disturbance activities within project including impact areas. They are also responsible for the monitoring of the implementation of the Cultural Heritage Management Plan (CHMP) and the Chance Find Procedure.

- Contractor will ensure that Chance Find Procedure is adequately enforced during all ground disturbance activities.
- In case of any further actions is required to identify the Chance Find (test pit or salvage excavation, other needed services), Contractor will mobilize an archaeology team (including necessary expertise and other work-power) and provide the necessary equipment.
- Contractor is responsible for ensuring that it's staff and representatives are appropriately trained for their responsibilities regarding cultural heritage.
- Contractor will record all chance finds on the Chance Find Report Form and the Chance Find Register as per the Chance Find Procedure given in Annex O.

## 5.2. Management Structure and Responsibilities

Contractor is responsible for the management of the plan and implementing of the procedures about cultural heritage and archaeological aspects of the Project. The monitoring archaeologist/s of the Project will train the employees about cultural heritage and the chance find procedure. Monitoring of the construction works will also be the responsibility of the monitoring archaeologist/s.

- The Project Manager will be in charge of all work team.
- The Environmental Manager will be in charge of the cultural heritage/archaeological monitoring expert/s and their daily, weekly and monthly activities. Cultural heritage and archaeological monitoring reports (daily, weekly and monthly) will be submitted to Environmental Manager by monitoring expert/s. The cultural heritage/archaeological monitoring expert/s will work with the equipment operators and have authority to stop the work. The archaeologist will accompany all ground disturbance activities of the project. The cultural heritage/archaeological monitoring expert/s will instruct the operator to stop the work in case of a chance find. Continuation of the ground disturbance activities after a chance find will also be under the authority of the cultural heritage/archaeological monitoring expert/s. The cultural heritage/archaeological monitoring expert/s will submit scheduled progress reports and special reports of chance finds to the Environmental Manager.

## 6. TRAINING, REPORTING AND MONITORING

### 6.1. Training

The cultural heritage/archaeological monitoring expert/s from Contractor will provide cultural heritage training to all relevant project staff in order to get capacity building with regards to cultural heritage importance and preservation including the implementation of the chance find procedure as part of their Environmental Training.

All on-site construction staff will be trained in the application of the CFP and basic identification of cultural heritage resources of the area to aid with identification of chance finds.

The expert/s will receive Environmental Training as well as specialized training for the procedures to follow for all ground disturbance activities. These trainings will be repeated periodically. The records of the training such as attendee list, the presentation made during the training, etc. will be kept by the experts as hard copy and electronical copy.

### 6.2. Reporting

The cultural heritage/archaeological monitoring expert/s will record all chance finds on the Chance Find Report Form and the Chance Find Register as per the Chance Find Procedure given in Annex O. The register will be kept up to date by the experts. The Chance Find Report Form will be kept in hard copy and as electronical copy (scanned version) at the project camps. A summary of the status of chance finds will be reported by the experts to Environmental Manager on a weekly basis.

### 6.3. Monitoring

The function of the archaeological monitoring process will be as follows:

- Provide advice to define the areas where the construction activities may continue or shall be stopped due to archaeological/movable/immovable cultural heritage findings.
- To record archaeological/cultural heritage features observed on, and close to the existing project related areas.
- To record archaeological/cultural heritage features discovered during project construction activities.
- To provide advice in the form of a 'preliminary assessment' to the relevant department on the significance and implications of new archaeological discoveries on the project construction areas.

All ground disturbance activities will be monitored by cultural heritage/archaeological monitoring expert/s during the construction activities. In case of encountering any

archaeological/cultural heritage findings, the Chance Find Procedure described in Annex O will be initiated.

The schedule for monitoring will be developed in coordination with the construction schedule. Monitoring activities will be implemented daily. The monitoring schedule will be dictated by the construction schedule as determined by the construction/operation management.

## 7. CULTURAL HERITAGE FINDINGS

The procedure given in Annex O that must be followed in case of encountering a chance find is based on national legislation and provisions of international standards and best practices. Description of the significance levels of the findings is given below. The significance of the archaeological/cultural heritage finding may vary upon the assessment of the Adana Museum Directorate. Regardless of the level of significance, in case of a finding the construction activities shall be ceased in the field where the finding is discovered and the findings shall be reported to the relevant museum expert. Following the completion of investigation of the relevant Museum Directorate, the necessary arrangements, such as the identification of the boundaries of the archaeological/cultural heritage asset/site (finding), its protection by taking necessary measures, notification of workers in order to prevent any physical intervention, will be implemented.

### 7.1. Minor Significance

This type of findings is comprised of a finding isolated from its environment or findings in notably small sizes which may be found by chance. In this case, chance find procedure (Annex O) will be followed.

### 7.2. Moderate Significance

This type of findings is small scale findings in groups or single findings with medium size architectural elements such as tombs. In this case, chance find procedure (Annex O) will be followed. In order to prevent a possible damage, necessary arrangements must be made to determine the boundaries of the archaeological remains to keep the construction equipment out of access.

### 7.3. Major Significance

This type of findings is comprised of findings with great importance such as a settlement area, a tumulus, a mound or a big necropolis (wide graveyard areas with archaeological characteristics) and the construction activities must be immediately stopped and chance find procedure (Annex O) will be followed. This type of chance find may cover the entire construction site and the relevant project areas such as camp sites, quarries, soil stock area etc. that the entrance and exit of the construction equipment and vehicles cannot be managed without giving any damage to the archaeological remains.

## 8. REFERENCES

- General Directorate of Preservation of Cultural and Historical Heritage, “Law on Protection of Cultural and Natural Assets (1) Law No. 2863”, 1983.
- ICOMOS (International Council of Monuments and Sites) “Guidance on Impact Assessment for Cultural World Heritage”, January 2011.
- IFA (Institute of Field Archaeologists) Standard and Guidance for the Collection, “Documentation, Conservation and Research of Archaeological Materials”, 2001.
- IFA (Institute of Field Archaeologists) 1994, “Standard and Guidance for an Archaeological Desk Based Assessment” (revised 1999)
- IFA (Institute of Field Archaeologists) 1994, “Standard and Guidance for an Archaeological Watching Brief” (revised 1999)
- IFA (Institute of Field Archaeologists) 1994, “Standard and Guidance for an Archaeological Field Evaluation” (revised 1999)
- UNESCO, “Convention Concerning the Protection of the World Cultural and Natural Heritage”, November 1972.

## **Annex N-1: Cultural Heritage Site and Assets List within Project Construction and Project Impact Area**



No	Name of the Area	Province	District	Registration Status	Scale and Severity of Change / Impact	The Value of Cultural Heritage	General Impact
1	Kurtpınar Ancient Waterway	Adana	Ceyhan/Kurtpınar	Registered	Major Change	High	Large / Very Large
2	Karanlık Kapı 1st and 3rd Degree Archaeological Site	Adana	Ceyhan/Kurtpınar	Registered	No Change	High	Neutral
3	Medieval Turkish Cemetery	Adana	Ceyhan/Kurtpınar	Registered	No Change	High	Neutral
4	Muttalıp Huyuk	Adana	Ceyhan/Sarımazı	Registered	No Change	High	Neutral
5	Archaeological Trace 1	Adana	Ceyhan/Kurtpınar	Unregistered	Major Change	Negligible	Slight
6	Archaeological Trace 2	Adana	Ceyhan/Kurtpınar	Unregistered	No Change	Low	Neutral