CEYHAN PROPANE DEHYDROGENATION POLYPROPYLENE PRODUCTION PROJECT

CHANCE FIND PROCEDURE (ANNEX-O)

FEBRUARY 2023 ANKARA

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CHANGE FIND PROCEDURE

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CLIENT:

Ceyhan Polipropilen Üretim A.Ş Portakal Çiçeği Sokak No:33 Yukarı Ayrancı Çankaya - Ankara / Türkiye \$\tilde{\mathbb{T}}: +90 (312) 840 10 00

县: +90 (312) 442 58 16

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1. INTRODUCTION

Ceyhan Polipropilen Üretim A.Ş. (Ceyhan PP A.Ş. or Project Company) is responsible for the management and protection of cultural heritage resources within the Ceyhan PDH-PP Project (the Project) and associated facilities construction and impact area. Some cultural heritage assets have been encountered within the project construction and impact area during the ESIA studies. Suggestions to protect cultural heritage assets and sites encountered within the project impact area were described on the ESIA. However, there is still a possibility of encountering some unknown archaeological sites and cultural heritage assets as a Chance Find during project construction activities.

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2. PURPOSE

The purpose of this document is to outline the procedure and respective responsibilities in relation to the management of Chance Finds during project construction works performed at terrestrial section for the Project and for the associated facility, which is has terrestrial (propane tank) and marine structure (jetty).

The procedure applies to all project activities including associated facilities within the project related impact areas (temporary project worksites outside the licence area such as energy transmission lines and access roads etc).

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3. **DEFINITIONS**

Chance Find	Potential cultural heritage objects, features or sites that are identified outside of a formal site reconnaissance, normally as a result of construction monitoring.
Museum Directorates	Adana Museum
Regional Conservation Council	Adana Regional Council for the Conservation of Cultural Property
Project	Ceyhan PDH-PP Project
Shall and Must	Indicates mandatory requirements.
Should	Indicates that a provision is not mandatory but recommended as good practice.

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4. ABBREVIATIONS

CFP	Chance Finds Procedure
CHMP	Cultural Heritage Management Plan
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment

5. ROLES AND RESPONSIBILITIES

The Project Company is responsible for complying with the procedure for onsite activities during project construction activities. All relevant employees involved in construction works will be trained in relation the implementation of the procedure. Subcontractors will implement the Project Company's Chance Find Procedure. The SPV managing the Terminal Facility, which is considered as associated facility, will develop and implement its own environmental and social management plans and procedures, including the Chance Find Procedure. However, similar procedure to the Project Company Chance Find Procedure might be applied by the SPV for the Terminal Facility. In general, there is no differentiation between chance find occurred at terrestrial section and marine environment.

Project Role	Responsibilities
Site Manager	 Ensure E&S issues are being adequately addressed on site by all related departments. Support E&S site provides adequate resources on site to implement E&S monitoring and inspection activities.
E&S Manager	 Preparation or revision of E&S documentation plans and procedures as required. Participation in the identification process of significant impacts for the project and assisting to develop relevant preventive and corrective actions. Coordination of environmental and social information flow. Ensuring that E&S mitigation measures are implemented and controlled during the project construction activities. Developing and implementation of an environmental and social audit program and sharing lessons learned between all related departments and staff. Manages site based environmental inspectors, community liaison officers and cultural heritage/archaeological monitoring expert/s. Maintain effective communication with the construction and project management team. Ensure the ESIA mitigation measures, through on-site daily inspection, advice and assistance to site construction and project management and personnel on all environmental, social and cultural heritage matters. Day-to-day monitoring of construction activities as they related to E&S performance. Raise NCR or Corrective Actions as required, and track closure. Participate in audits relating to E&S matters. Plan and Manage the environmental and social trainings for all project staff for Cultural Heritage Preservation and related procedures. Daily reporting of E&S issues in construction activities to Site Management. Weekly reporting of E&S issues in construction activities to Site Management.
	 Weekly reporting of E&S issues in construction activities to Site Management. Participate to meetings related to Cultural Heritage issues.
Cultural Heritage/Archaeological Monitoring Expert/s	 Provides advice in the form of a 'preliminary assessment' to the site and E&S managers on the significance and implications of new archaeological discoveries in the project activity areas. Ensures Chance Find Procedure is followed, Conducts and documents pre-construction surveys Records archaeological features discovered during pre-construction and ground disturbance activities. Determines the needs for cultural heritage resources protection and implement mitigation measures. Has the authority to stop ground disturbance activities to investigate potential chance finds. Ensures that the relevant cultural heritage signs are displayed where and when required. Implements chance find procedure and provides expertise during a chance find. Delivers cultural heritage preservation trainings to all project staff.

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Project Role	Responsibilities
	 Issues non-compliances when required and ensures all corrective actions are completed in a timely manner Provides daily field and monitoring reports to the E&S manager Conforms to all requirements of the archaeological/cultural heritage assets recommendations in the ESIA

6. CHANCE FIND PROCESS

Cultural Heritage Monitoring Expert/s will be on site during all construction or ground disturbance activities to watch for the presence of cultural heritage resources. The following table outlines the step by step process to be followed upon a chance find discovery.

STEP 1 - After the discovery of a chance find:

- All work must cease at the location where the discovery is made
- A temporary buffer zone around the chance find will be put in place. The buffer zone should be of sufficient size to prevent damage to the chance find or suspected further area of interest.
- The Cultural Heritage Monitoring Expert/s will contact the Contractor site management and museum archaeologist <u>immediately</u>
- The Cultural Heritage Monitoring Expert/s will properly secure the chance find site: flagging, no-entry signs etc.
- · Protection of site: the chance find should not be moved, removed or further disturbed

STEP 2 - Recording

- The Cultural Heritage Monitoring Expert/s will fill out Chance Find Form Part A and send a copy to E&S manager within 24 hours
- The Cultural Heritage Monitoring Expert/s will retain a copy of Chance Find form for his/her record

STEP 3 - Contact with local authority

• The Cultural Heritage Monitoring Expert/s will notify the relevant Museum Directorate for the chance find

STEP 4 - Authority's decision

• The relevant Museum archaeologist will determine the value of the chance find and corresponding actions.

STEP 4 A - No significance to site

- The museum archaeologist declares that the site is considered to be of no significance
- The Cultural Heritage Monitoring Expert/s informs relevant managers
- The Cultural Heritage Monitoring Expert/s records the decision on Part B of Chance Find form and sends a copy to E&S manager within 24 hours
- The Cultural Heritage Monitoring Expert/s retains a copy of Chance Find form for his/her record
- No further actions required
- This step closes out the chance find procedure
- Construction activities may resume

STEP 4 B - Significance to site

- The museum archaeologist declares that the site is considered to be of significance
- Museum directorate archaeologist decides on further actions and informs the Cultural Heritage Monitoring Expert/s The Cultural Heritage Monitoring Expert/s informs relevant managers.
- Cultural Heritage Monitoring Expert/s records the decision on Part B of Chance Find form
- Proceed to Step 5

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STEP 5 - Site investigation

- Project personnel follows the relevant Archaeology Museum directorate archaeologist's instructions
- After field investigation, Museum archaeologist declares the site has minor significance
- The Cultural Heritage Monitoring Expert/s inform their managers
- The Cultural Heritage Monitoring Expert/s records the decision on Chance Find Form Part C and sends a copy to E&S manager within 24 hours
- The Cultural Heritage Monitoring Expert/s retains a copy of Chance Find form for his/her records
- No further actions required
- This step closes out the chance find procedure
- Construction activities may resume

- After field investigation, Museum archaeologist declares <u>the site</u> <u>has moderate significance</u>
- Further studies such as test pit / salvage excavations or remote sensing investigation are to be completed
- Museum Directorate archaeologist provides instructions, and/or supervision for the studies
- The Cultural Heritage Monitoring Expert/s informs their managers
- Under the supervision of the museum archaeologist, project management provides a study team. The team will be composed of qualified archaeologists, other experts and workers.
- Once the excavation is completed, the study team provides a report to the Museum Directorate,
- The Museum Directorate reports the study outcomes to the relevant Regional Councils for the Conservation of Cultural Property.
- The relevant Regional Councils for the Conservation of Cultural Property officially confirms completion of recovery and informs the project management.
- The Cultural Heritage Monitoring Expert/s records the decision on Chance Find Form Part C and sends a copy to E&S manager within 24 hours
- The Cultural Heritage Monitoring Expert/s retains a copy of Chance Find form for his/her record
- No further actions required
- This step closes out the chance find procedure
- Construction activities may resume

- After field investigation, Museum archaeologist declares the site has major significance
- Salvage excavation is to be completed
- Site is to be treated according to Turkish archaeological regulations "Law on the Conservation of Cultural and Natural Property (2863) 21.07.1983
- Museum Directorate archaeologist provides instructions, and/or supervision for test pit/salvage archaeological excavation
- The Cultural Heritage Monitoring Expert/s inform their managers
- Under the supervision of the Museum archaeologist, project management provides a salvage excavation team. The team will be composed of qualified archaeologist and workers.
- Once the excavation is completed, salvage excavation team provides a report to Museum Directorate
- The relevant Regional Councils for the Conservation of Cultural Property officially confirms completion of recovery and informs the project management.
- Site will be officially recorded and protected according to Turkish regulations
- The Cultural Heritage Monitoring Expert/s inform to the related managers.
- The Cultural Heritage Monitoring Expert/s records the decision on Chance Find Form Part C and sends a copy to E&S manager within 24 hours
- The Cultural Heritage Monitoring Expert/s retains a copy of Chance Find form for his/her record
- · No further actions required
- This step closes out the chance find procedure

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 Construction activities may resume or preventive further actions are needed

It is important to note that in the case of finding human remains, the site supervisor and the local authorities will be immediately notified. A suitability qualified person would attend along with the police authority to determine if the remains are due to a suspicious death, an authentic burial grave or of archaeological note.

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MONITORING AND REPORTING 7.

The Cultural Heritage Monitoring Expert/s will visually monitor all construction or other ground disturbance activities for evidence of presence of cultural heritage items.

Chance Finds will be recorded on the Chance Find Report form (ANNEX O- 1). All Chance Find Report forms will be kept in hard copy at the camp and will also be scanned and saved electronically after completion of each section of the form.

Chance Finds will be recorded in the Chance Find Register (ANNEX O- 2) which will be kept up to date by Cultural Heritage Monitoring Expert/s. It will be reviewed in regular E&S meetings (weekly or monthly).

Field work was carried out during the preparation phase of the Archaeological Heritage Baseline Report prepared for the Project, and the pictures of the potential find samples identified are given in ANNEX O- 3.

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-1). 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. The contact information of the responsible cultural heritage authorities in the province crossed by the Project is given in ANNEX O-4.

8. REFERENCES

STANDARDS, LEGISLATIONS and LAWS

Ministry of Culture and Tourism, Law No:2863, **Preservation of Cultural and Natural Assets**

Ministry of Culture and Tourism, Principle Decision No: 658, **Archaeological Sites, Conditions of Protection and Usage**

International Finance Corporation (World Bank Group), PS 8, Cultural Heritage

The European Bank for Reconstruction and Development, PR 8, Cultural Heritage

ANNEX O-1 – Chance Find Report Form

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CHANCE FIND REPORT FORM RASLANTISAL BULUNTU RAPOR FORMU

PART A BÖLÜM A						
Project Location: Proje Sahası	District (İlçe): Village (Köy):	Date: Tarih	Form No:			
Name of person reporting cha	ance find:	Tami	. L			
Rastlantisal buluntuyu rapor		- · · · · · · · · · · · · · · · · · · ·	T.V.			
Was work stopped in the imm	•		∃ Yes □ No vet Hayır			
Was a buffer zone created to	protect the chance find	?	□ Yes □ No			
Rastlantisal buluntuyu korum	ak için tampon bölge ol	uşturuldu mu? E	vet Hayır			
NOTIFICATION BILDIRIM						
Site manager and E&S mana Saha Müdürü ve Çevre müdü	•	□ \ Evet				
CHANCE FIND DETAILS	ıru ile irtibata geçildi		Hayır			
RASLANTISAL BULUNTU A	YRINTILARI					
GPS coordinates GPS koordinatları	(HD quality – no cell protograf kaydı Evel (HD kalitesinde – cep değil) If not, explain why: Yok ise nedenini açıkı Other records Specify (drawings, HE Diğer kayıtlar	(HD quality – no cell phone photos) Fotoğraf kaydı Evet Hayır (HD kalitesinde – cep telefonu fotoğrafı değil) If not, explain why: Yok ise nedenini açıklayınız Other records □ Yes □ No Specify (drawings, HD quality videos, etc.):				
Description of chance find: Rastlantısal buluntunun tanımı Description of site and vegetation: (e.g. surface sediment type, ground surface visibility, distance to closest watercourse, etc.) Sahanın ve bitki örtüsünün tanımı: (örn. Yüzey sediman türü, yüzey zemin görünürlüğü, en yakın suyoluna olan mesafe, vb.)						
PART B BÖLÜM B						

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NOTIFICATION OF MUSEUM DIRECTORATE ARC MÜZE MÜDÜRLÜĞÜ ARKEOLOĞUNA BİLDİRİ	HAEOLOGIST			
Monitoring archaeologist contacted museum directorate archaeologist ☐ Yes ☐ No Arkeolog müze müdürlüğü arkeoloğu ile irtibata geçti. Evet Hayır				
Date of notification: Bildirim tarihi				
Name of museum directorate and Name of museum Müze müdürlüğü ve Müze müdürlüğü arkeoloğunun i				
Contact number of museum directorate archaeologis Müze müdürlüğü arkeoloğunun iletişim numarası				
DECISION OF MUSEUM DIRECTORATE ARCHAI MÜZE MÜDÜRLÜĞÜ KARARI Date of site visit:	EOLOGIST			
İlk saha ziyaret tarihi:				
	I			
□ Site of no significance - Construction to proceed with no further action — End of chance find procedure Önemsiz saha — İnşaat daha fazla araştırma yapılmadan devam edilebilir — rastlantısal buluntu prosedürün sonu. Date of notice to resume work: İşe başlama tarihi bildirisi	□ Site of significance - Further actions required Önemli saha – Ek araştırma gerekmektedir Please Fill out Part C Lütfen Bölüm C'yi doldurun.			
Name of museum directorate archaeologist: Müze müdürlüğü arkeoloğunun ismi Contact information: İletişim numarası				
Site manager and E&S manager contacted Saha Müdürü ve Çevre müdürü ile irtibata geçildi	□ Yes □ No Evet Hayır			

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PART C			
BÖLÜM C			
FURTHER FIELD INVESTIGATION			
EK SAHA ARAŞTIRMASI			
☐ Site of minor significance	□ Site of moderate	☐ Site	of major significance
Önemsiz saha	significance		önemli saha
	Az önemli saha		
Describe additional work to be condu	cted:	•	
Yapılması gereken ek işlerin tanımlar	7		
Data started	I Bata a sanatat		
Date started:	Date complete	ea:	
Başlangıç tarihi Date of notice to resume work:	Bitiriş tarihi		
İşe başlama tarihi bildirisi Name of museum directorate archaec	plogiet:		
Müze müdürlüğü arkeoloğunun ismi:	ologist.		
Contact information:			
İletişim numarası			
Construction manager contacted	Г	Yes	□ No
İnşaat müdürü ile irtibata geçildi		res et	
ırışaat muuuru ile irtibata geçildi	<i></i>	/C1	Hayır

ANNEX O-2 – Chance Find Register

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	CHANCE FIND REGISTER							
DATE OF FIND	SUMMARY OF CHANCE FIND	NAME OF AUTHORITY NOTIFIED	ACTION TAKEN	CHANCE FIND FORM COMPLETED	STATUS OPEN OR CLOSED	REMARKS		

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ANNEX O-3 – Potential Chance Finds

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Medieval Turkish Cemetery



Archaeological Trace-1



Late Roman- Early Byzantine Period Ceramic Pieces



Late Roman- Early Byzantine Period Ceramic Pieces

ANNEX O-4 – Contact Information

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Museum Directorate	Address	Phone	Fax	E-Mail
Adana Museum	Döşeme Mahallesi, Ahmet Cevdet Yağ Bulvarı No: 7, Seyhan / ADANA	(0322) 454 38 55 - (0322) 454 38 57	(0322) 454 38 56	adanamuzesi@ktb.gov.tr

Preservation Board	Address	Phone	Fax	E-Maıl
Adana Regional Council for the Conservation of Cultural Property	Tepebağ Mah. 27044 Sokak No:5 01010 Seyhan / ADANA	(0322) 352 67 42 - (0322) 359 57 52	(0322) 352 67 42	adanakurul@ktb.gov.tr