

ADB Safeguard Policy Review Update – Phase 2 Regional Consultation Summary: Cultural Heritage Consultation 10-11 January 2022

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I. BACKGROUND

1. The Asian Development Bank (ADB) is undertaking a comprehensive review and update of its 2009 Safeguard Policy Statement (SPS).¹ The update process has been initiated by ADB Management following a Corporate Evaluation of the SPS by ADB's Independent Evaluation Department (IED), completed in May 2020 (IED Report).² The update will build off the findings and recommendations of the IED report, which ADB Management endorsed. Overall, the policy update will seek to strengthen safeguard implementation effectiveness and efficiency, in ways that will enhance beneficial safeguards outcomes for the environment and affected people.

2. The revised safeguard policy (the Policy) is expected to be ready for ADB Board consideration in 2024, following a process of further reviews, policy development and meaningful stakeholder engagement. As part of this process, ADB is undertaking a series of brief analytical studies. These studies benchmark ADB's current SPS against the policies of selected multilateral financial institutions (MFIs) and also consider implementation experience of the existing SPS as well as other MFI policies³. The studies will inform the development of the new safeguard policy and their findings are being provided for stakeholders as part of the consultation process.⁴ Stakeholder engagement and consultation will have three main phases: Phase I—preliminary information and outreach on the overall approach for the policy update and stakeholder engagement plan; Phase II—consultation on the analytical studies; and Phase III—consultation on the draft policy paper. The objective of Phase II consultations, currently being conducted, is to obtain a better understanding of the views of stakeholders on safeguards implementation challenges and good practices, as well as recommended policy directions. This document provides a summary of the consultations for Cultural Heritage and should be read in conjunction with the accompanying analytical study report.⁵

II. PROCEEDINGS

3. The online regional consultations for the Cultural Heritage safeguards were conducted on 10–11 January 2022. Three sessions were organized in various time zones to allow participation of ADB's developing member countries (DMCs), other ADB regional and non-regional members, as well as civil society organizations (CSOs) and nongovernmental stakeholders.⁶ A total of 97 non-ADB stakeholders participated in the three sessions, where each session ran for more than two hours, providing ample time for discussion. English was the main language used in each session although simultaneous interpretations were provided.⁷ Consultation materials were provided to the participants in advance, and these were translated into various languages.⁸

¹ ADB. 2009. [Safeguards Policy Statement](#). Manila.

² ADB. 2020. [Evaluation Document: Effectiveness of the 2009 Safeguard Policy Statement](#). Manila.

³ The studies are intended to complement the evaluation completed by IED in May 2020 and will not duplicate IED's work on the overall effectiveness of the SPS.

⁴ The update process is guided by a [Stakeholder Engagement Plan](#).

⁵ ADB. 2021. [Summary of the Analytical Study for the Safeguard Policy Review and Update: Cultural Heritage \(Draft for Consultation\)](#). Manila.

⁶ The three sessions were for: (i) DMCs, CSOs, and nongovernmental stakeholders in East Asia, Pacific, and Southeast Asia; (ii) member countries, CSOs, and nongovernmental stakeholders in North America and Europe; and (iii) DMCs, CSOs, and nongovernmental stakeholders in Central and West Asia and South Asia.

⁷ Languages available for simultaneous interpretations were Hindi, Urdu, Russian, Bahasa Indonesia, Chinese, Khmer, Lao, and Vietnamese.

⁸ The analytical study and presentations are available in English, Hindi, Russian, Chinese, and Bahasa Indonesia.

4. The agenda for the three sessions followed a similar format, starting with a welcome message from Bruce Dunn, Director of ADB's Safeguards Division (SDSS) of the Sustainable Development and Climate Change Department (SDCC). It was followed by a presentation from Aaron Sexton, Environment Specialist, SDSS. A discussion moderated by Duncan Lang, Senior Environment Specialist, SDSS, followed where participants were provided the opportunity to ask questions and provide input for the policy update. Azim Manji, Stakeholder Engagement Team Leader (ADB consultant), and Jelson Garcia, Senior Stakeholder Engagement Team Leader (ADB consultant), served as overall moderators in the three sessions. Each session concluded with a brief event evaluation and synthesis by Bruce Dunn.

5. In his welcome message, Bruce Dunn introduced the objectives of the regional consultations, presented brief details on the overall approach and methodology for the policy update, and discussed the context for the session on Cultural Heritage.

6. Aaron Sexton stated the rationale and objective of the review, explained the methodology for the study, defined the term physical cultural resources (PCR) in the current SPS, provided an overview of the challenges and gaps in implementing PCR safeguards, and highlighted how ADB's SPS compares with other MFIs.⁹ His presentation provided details for the following policy considerations: (i) development of a separate standard and supporting technical guidance for cultural heritage; (ii) enhancement of definitions and terminology; (iii) inclusion of intangible cultural heritage; (iv) commercial use of cultural heritage; (v) Indigenous People and their cultural heritage; (vi) impact sensitivity; (vii) addressing recurring issues: user access, visual impacts, chance find procedures, confidentiality, and contractor/third-party performance; (viii) improvement of data collection and storage; and (ix) enhancement of technical working standards and the application of best available techniques (BAT). He then provided a series of emerging themes for further stakeholder discussion: (i) identification of patterns of cultural heritage in Asia and in sub-regions within Asia; (ii) marine heritage; (iii) human burial sites and cemeteries; (iv) the application of new technologies; and (v) consideration of cultural heritage as a project opportunity. Finally, he shared key messages from the study: (i) SPS policy gaps that require further enhancement and clarity; (ii) MFIs studied have become more aligned with one another in cultural heritage policy principles and thus provide opportunities for convergence; (iii) ADB seeks improvement to practice through, but not limited to, developing a separate standard and supplementary guidance material with the inclusion of more robust language and definitions; (iv) an updated policy can place greater requirements on borrowers or clients to protect cultural heritage and achieve effective compliance; and (v) the safeguard review and update is an opportunity to include new concepts, such as intangible cultural heritage and emerging themes.

III. KEY TAKEAWAYS AND DISCUSSION

7. In the moderated discussions, participants were asked to share perspectives on improving ADB's safeguard policy. This discussion encouraged participants to provide opinion on MFI policies that ADB could adopt or take a different approach on, suggestions on how ADB could improve compliance and protect cultural heritage, and recommendations of good practice beyond MFI policies.

⁹ ADB compared its policy against the following MFI's: World Bank (WB), International Finance Corporation (IFC), European Bank for Reconstruction and Development (EBRD), Inter-American Development Bank (IDB), and Asian Infrastructure Investment Bank (AIIB).

8. During the discussions, participants shared the following views: (i) complexities relating to the inclusion and assessment of intangible cultural heritage; (ii) the need to consider variance of cultural heritage in terms of how differing laws, policies, and registries govern and protect cultural heritage across Asia and the Pacific; (iii) effective community engagement and consultation to improve the assessment process; (iv) consideration of linkages between cultural and natural heritage, including cross-cutting with indigenous communities and biodiversity; (v) opportunity to develop national data sets or country profiles; (vi) risks and rewards associated with the application of technology; (vii) the importance of "how" to achieve improvements, such as ensuring implementation capacity through training and guidance; (viii) increasing cultural heritage management opportunities and investment; (ix) exclusion of certain sites from development vs. the need for development to restore and promote sustainable use of cultural heritage; and (x) climate risk and disaster response associated with cultural heritage.

9. Participants noted that the current policy does not incorporate intangible cultural heritage so the updated policy should address this gap. In order to do so, a definition of intangible cultural heritage is required as well as further deliberation regarding its current application across other MFIs. The discussion also highlighted the importance of community involvement in addressing intangible cultural heritage impacts.

10. Many participants agreed that diversity and variance of cultural heritage geographically spread across the region is challenging yet shared opinion of the importance of its consideration within the policy update. National laws, policies, and the state of national registries also vary. Some participants highlighted the benefits of the development of country profiles that can serve as a starting point for baseline studies and there was consensus that these profiles should be accessible, living documents, which can be easily updated. Country profile examples have since been shared with ADB.

11. Several participants highlighted the importance of meaningful community engagement and consultation, specifically the value of open, two-way dialogue with community members to locate and map local cultural heritage. Participants stressed that gaining community trust can be time consuming, but a necessary process to adequately capture baseline information. The discussion also highlighted the value of working with local experts, who may be knowledge keepers of their cultural heritage, with one participant suggesting appropriate compensation for such expertise a necessary consideration. Consultation attendees also urged ADB to involve communities in project monitoring and to build capacity to achieve this.

12. Participants shared views on linkages and the cross-cutting nature of cultural and natural heritage, such as seasonal ceremonies or pilgrimages, and suggested that this synergy needs to be reflected in the policy update and during assessments. Some stakeholders were of the view that cultural heritage should be addressed through the social lens, rather than environmental assessment, due to the diverse nature of the discipline. Participants were of the view that cultural heritage assessments often lack ample expertise, both in the field and internally at ADB, and that developing country profiles could provide much needed support and guidance.

13. Stakeholders emphasized the need for better project screening and stated that rapid assessment processes can be too simplistic, often failing to adequately capture project information to support more robust management plans. Participants discussed the potential benefits of a categorization system that applies predetermined criteria to guide the scope and detail of a cultural heritage assessment. Participants also shared an awareness that cultural heritage governing bodies and institutions, such as the United Nations Educational, Scientific and

Cultural Organization (UNESCO) and International Council on Monuments and Sites (ICOMOS), should be consulted to leverage good practice and where practical adopt and integrate tools.

14. Some stakeholders encouraged ADB to use best available technologies (BAT) for mapping and baseline studies, whereas others cautioned its application due to potential risks associated with confidentiality or other unintended impacts that may put communities at risk. Other brief discussion points on this matter included issues linked to ownership, information usage, and capacity to effectively apply BAT.

15. A significant number of participants raised concerns to the challenge of policy implementation and urged ADB to think how this would be achieved and such challenges may be further compounded by a limitation in available good practice guidance. DMCs are likely to require technical assistance from ADB if new guidance is developed and implemented.

16. Several stakeholders stated certain cultural heritage sites should be excluded from impacts or interference from development activities, while conversely others felt cultural heritage could benefit from restoration or its commercialization. A few stakeholders reminded ADB that cumulative impacts of development projects can affect cultural heritage.

17. In response, ADB acknowledged that intangible cultural heritage will be addressed in the new safeguards policy as the analytical study has already identified this as a key gap. ADB welcomed the suggestion of creating country profiles as a potentially useful tool for screening and baseline studies. ADB agreed with participants that community and stakeholder engagement is critical for assessment, utilizing a people-centered approach and seeking the guidance of local experts, which is especially important as national registries are unlikely to contain comprehensive datasets of cultural heritage in any given DMC. Current stakeholder engagement needs to be strengthened and ensure this process is a two-way transaction. Consideration that religious events and ceremonies may occur seasonally or periodically was well-noted as was an understanding that linkages and crosscutting exist between cultural and natural heritage and disciplines such as biodiversity, indigenous communities, and climate change. The current policy is divided across environment, involuntary resettlement, and Indigenous Peoples and separately screens and categorizes safeguard policy principles, yet ADB is considering moving toward a more integrated process to better bridge these linkages. ADB expressed an awareness that there may be need for dedicated cultural heritage experts in ADB. ADB is aware of the importance of policy convergence and harmonization with respect to comparator MFIs and sees potential benefits of consultation and dialogue with organizations such as UNESCO and ICOMOS. ADB appreciated the vast array of benefits available through the application of technology (i.e., mapping cultural heritage), yet is aware of potential risks and unintended impacts upon communities. On data ownership, ADB clarified that data collected from baseline studies and assessments are essentially owned by project proponents—ADB's borrowers or clients from the public or private sector—but there are ongoing discussions on how such data can be shared publicly within the bounds of government regulations and freedom of information policies.

18. On the matter of ensuring effective implementation, ADB explained that apart from the policy itself, a series of standards will be developed on environment and social assessment processes. Where necessary, a standard will be supported by guidance that establishes supplementary nonmandatory information to guide implementation. An operations manual and staff instructions containing instructions will be developed for staff on due diligence, management systems, screening categorization, triggers for changing project scope, and impact assessment guidance. Guidance for borrowers or clients will likewise be developed and disseminated.

19. With respect to the views provided regarding preserving cultural heritage development as opposed to protecting or restoring it through development projects, ADB acknowledged the need for further discussion in relation to the policy, but agreed community consultation is critical during this process.

IV. EVALUATION AND WRAP UP

20. The moderated discussions were followed by quick evaluation sessions. In all three sessions, most of the participants rated ADB Cultural Heritage consultations (covering content, managing the flow, logistical arrangement, responding to feedback) 4 or higher (in a scale of 1 to 5, with 5 being the highest), and only very few rated ADB lower than 3. Written comments in Menti.com to improve the consultations are documented.

21. The synthesis for each consultation includes a summary of key points and questions raised by participants. An overview of the next steps and a reminder on how to send ADB further suggestions and recommendations are also mentioned.

Session recordings can be accessed here:

1. 10 January 2022: Consultation with Governments, Civil Society Organizations and other Non-Governmental Stakeholders in East Asia, Pacific, and Southeast Asia:
<https://events.development.asia/node/53451>
2. 10 January 2022: Consultation with Governments, Civil Society Organizations and other Non-Governmental Stakeholders in North America and Europe:
<https://events.development.asia/node/53446>
3. 11 January 2022: Consultation with Governments, Civil Society Organizations and other Non-Governmental Stakeholders in South Asia and Central and West Asia:
<https://events.development.asia/node/53441>

FEEDBACK FROM STAKEHOLDERS

Disclaimer: In view of transparency, the feedback was documented based on the manner of delivery or sharing of the stakeholders, though some feedback was edited for brevity and clarity. They are categorized by topic and reflect questions, comments, conclusions, and recommendations of stakeholders. All the feedback is discussed in the interactive session that is part of the consultations.

1. Policy architecture

- ADB may include a flowchart of the process in the revised policy to ensure clarity in the steps that heritage specialists should be involved in and up to what extent. What is ADB's timetable on policy update and its actual implementation? It would be best if there is another round of consultation after ADB has implemented the suggestions and comments made during this current round.
- Include adjustments per country or country-based policy due to the varied nature of physical cultural heritage (PCR) in each country, e.g., built structures in many parts of Southeast Asia but not in the Philippines. It was clarified if cultural heritage data can also be accessed for academic purposes and cited the example from a biodiversity perspective.
- Cultural heritage is an area that is not really well-known and would like to know how ADB will roll it out and make it accessible. Cultural heritage safeguards is probably the least referred to or taken seriously partly due to staffing issues in multilateral financial institutions (MFIs).
- ADB should incorporate all the relevant updates to the World Bank Environmental and Social Framework (ESF) as identified in the IED document. The World Bank conducted an effective consultation, and key stakeholders (including Society for American Archaeology) were able to contribute usefully. The submission from the organization can be shared with ADB.
- ADB needs to define its rationale related to cultural heritage. It has so far not been identified. The rationale will define boundaries for both tangible and intangible cultural heritage.
- ADB must provide technical assistance. This is a new emerging topic, and the organization and the countries need technical assistance.
- On the separate standard for tangible and intangible cultural heritage, it was suggested to treat it just like other projects—consider categorization of projects depending upon the cultural heritage sensitivity and use a code system. It is very important to distinguish between the tangible and intangible cultural heritage. A certain code system may be needed. For instance, projects with tangible cultural heritage can be coded with “A” and intangible can be coded with “C,” so they are easier to identify.

2. Identification of cultural heritage

- The biggest issue is the lack of real understanding of the experts and the communities' position during scoping and screening. The focus is largely on environmental issues. Even during the consultation session, there is a lack of cultural heritage experts. From experience in Georgia, there have been projects with good intentions to protect the cultural heritage of the communities that resulted in changing its cultural significance or actually destroying it. The impacts are irreversible for cultural heritage.
- How would ADB and project implementers meaningfully assess the risk on tangible and intangible cultural heritage? Furthermore, how will mitigation of those risks be assessed on whether they were complied with by the borrower? In case unfavorable things happen and local communities feel that their cultural heritage has been affected because of the project, how would the accountability mechanism be triggered?
- ADB should look outside of the practices of MFIs and towards international organizations, such as United Nations Educational, Scientific and Cultural Organization (UNESCO) and International Council on Monuments and Sites (ICOMOS), to propose to ADB how to better organize scoping and screening processes and then integrate that in impact assessments. The idea of having an integrated approach and looking at overall impacts of the projects was affirmed, but this should not be done from the environmental point of view or the commercial side. The ICOMOS experience and tools can be considered and integrated in ADB's policy. ADB can set the trend at least on this issue and it would be a great way to improve its practices.
- Include guidance on the triggers for additional impact assessments and updating of management systems in case of changes in the project. Some conservation management systems are moving towards adaptive management particularly for cultural landscapes and strong linkages between cultural and natural sites are being addressed. The thrust is not just conservation but safeguarding and stewardship.
- Having safeguards on cultural heritage is very important as indigenous resources are being looked at for extraction. Participation of communities in the whole process of identification of cultural heritage is important, especially knowledge holders. Communities have different protocols for discussing different aspects of their culture, and identification cannot be left to so-called experts, especially experts from outside the community. Based on Conservation International's experience, the best way of getting communities to open up about sensitive issues is to develop trust, and that process takes time. Even within communities, elders are not very open to discussing some of these issues with the youth, which may pose challenges in drafting a cultural heritage plan and mitigation measures. There are protocols to follow even for the use of these heritage sites. The participation of knowledge holders and the entire community is a very important component and there is a need to be culturally sensitive in this process. With respect to the issue of technology, it can be very helpful, but at the same time, it can be very intrusive. Technology use can result in unintended consequences. For instance, the use of drones reveals or makes public and records hidden heritage sites. There should be safeguards in the use of technology as well.
- Community involvement and having communities and traditional stakeholders integrated into the development process are very important. The current safeguards' assumption is

that most sites and properties have management systems or plans in place, but this is often not the case. Implementing agencies would like to produce objective and credible impact assessments, screen sites properly to ensure they are not hitting any sensitive areas, but there are numerous challenges. They typically must work with very little information or data; it takes a while to build trust and get the communities involved. Often, they need to screen quickly and be able to mitigate any impact that the project will have. There is a need for improving the screening methods and not just simply limiting properties or sites into types, since in the context of Asia, it is layered and one cannot separate culture and nature, and the community that is part of that heritage. Most of the screening methods would just place these properties and sites into neat little boxes that do not really work for the context.

- Regarding the cultural heritage sites, many of them are at the local or community level. The key protectors of the important cultural heritages are the members of the local communities. Their participation and contribution are crucial, and they should be given the knowledge and the technology to be more involved. There was a mention of national-level efforts. Does the revised policy provide details on support to local communities?
- There is no dichotomy between cultural and natural heritage, especially in Asia where people strongly believe how conserving culture and nature is based on tradition, which means that culture is the basis for nature conservation. The two are blended and must not be treated separately when planning for development. This also applies in terms of conserving not just PCR, but also intangible cultural heritage. Consultation is important but it is not simply informing people, it should be more about sharing knowledge from the local people to the development team and vice versa as this will enrich the local people's knowledge and decision-making. There are cases when local people are not aware of local laws and regulations they must follow and simply do things the way they were taught and have been doing for generations. Discovering such things through cultural mapping exercises and discussions with the local communities is a process that must occur in stages to gain the trust of the people, and thus, take time. ADB was requested to develop such a process, from the preliminary stages up to monitoring by the local people even after project completion to promote sustainability.

3. Risk assessment and accountability

- In terms of the Mangla Dam, what is the next step once those tangible or intangible cultural heritage are identified through impact assessments? There are no arrangements in place and there is no way to hold governments and even MFIs that funded those projects to account for submerged assets. The cultural heritage resources were submerged and there was nothing left for future generations. For the Mangla dam, all those generations have uprooted, have lost everything, centuries of significant cultural and religious heritage and left nothing for future generations. What are the safeguards available for those?

4. Intangible cultural heritage

- The tangible and intangible question is one where ADB can make serious headway, because the other banks may have limited resources on the concept of intangible but have not really developed it. ADB is wise to look at harmonizing with other MFIs, but also, have an opportunity now to forge ahead and maybe be an exemplar in creating the new policy. ADB may use electronic technology for awareness creation and create a community of

practice that will include cultural heritage and natural heritage organizations as well as disaster mitigation and relief organizations, because this is very important for the protection of cultural heritage.

- The analysis that ADB prepared in advance of the consultation was very useful and identified most of the key gaps. Intangible heritage, and taking account of indigenous heritage, is something that were struggled with in environmental consultancy over the last 20 or 30 years. It is easy to say that there is a need to do more of it, but there is very little good practice around. Thus, the most important thing is not stating the need for it, and the standards, but the guidance. There is relatively limited good practice to refer to. It is an evolving area, but there is an opportunity for synergies and how different disciplines can work more effectively together, specifically for cultural heritage specialists who work more closely with stakeholder engagement teams and socioeconomic teams so that it becomes a single and well-coordinated consultation phase with the communities.
- A lot of the existing guidance refers to the commercialization of intangible heritage and how it is important to consult with communities about that. Projects are exploiting the heritage of a community instead of the more common practice of ignoring or neglecting it. Perhaps that can be connected instead, for projects at the onset, to look at how to add value to projects and make them of better quality through the work being done on cultural heritage and having more effective two-way conversations with indigenous communities. It's about identifying both opportunities and impacts.
- In the Oyu Tolgoi mining project in Mongolia, one of the key aspects of that project was developing some capacity within Mongolia, so that they could take care of their own heritage. Part of the problem was a lack of trained people, but that might not be true in Mongolia. They had plenty of archaeologists, anthropologists, and historians. But what they did not have is a lot of experience with some of the things discussed in the consultation— International Council on Monuments and Sites (ICOMOS), International Council of Museums (ICOM), and all these other bank standards. A year was spent understanding local communities—what was important to them, what places were important to them, what natural resources were important to them. It is not just getting information out of them but collaborating with them. When there are traditional knowledge experts, they are the experts and, as such, they need to be compensated and the banks and other agencies do not do this well. They extract information very well, but they do not acknowledge that contribution and they do not ask for collaboration. This becomes very important in the mitigation or the resolution of effect aspect. One of the most important intangible heritage is language. They want to protect their language and how is that done? That is a very hard thing to do within a development context. The kind of intangible heritage needs to come from the community. They must identify it, the challenges that they could face, and be given the tools to deal with them. Intangible heritage mitigation is much more than just digging a site or doing a particular resolution. It is an ongoing community-based discussion that empowers the community to identify important things and how to keep them.
- The direction of ADB towards looking at intangible cultural heritage as having the same significance as PCR is welcomed, since this is very important for many indigenous communities. Many projects might directly or indirectly affect their knowledge systems and practices and many of those are related to nature and other PCR. An exclusion list for

projects that would affect intangible cultural heritage which serve as identity markers for communities is recommended. This may include not only those in relation to their livelihood, but also indigenous customary systems and justice systems. These could be considered as well in the discussion on grievance redress mechanisms. Contextualizing in the national laws and policies is important and there is a movement for cultural mapping or profiling in the Philippines. For these types of activities, cross-checking with communities on the ground is very crucial.

5. Use of technology

- Aside from being very careful about the use of technology, full information disclosure to communities is even more important. They must be made aware of what technology is going to do. Communities are often excited to hear about technology and it has been very useful in mapping and establishing the bounds of territories. But oftentimes, ownership of the data obtained through the technology is not discussed with them. An example is the use of cameras in tracking certain species of animals where the placement of the camera can violate the privacy of members of the community, such as when it is positioned in areas where women bathe or wash clothes without knowing that they are being recorded. The unintended consequences should be made known to the communities so that they are able to make the best decision on the use of technology.
- On technology use, the issue is for local communities to own the data on their lands, territories, and resources, including cultural heritage. Communities may not necessarily want to publicize the specific location of certain areas such as caves and sacred sites or sacred burial grounds or areas where there are a lot of mineral resources, which might lead to illegal mining. Many communities are facing this problem.

6. Implementation capacity

- The most important concern is the capacity of people to implement the policy in the environment and social impact assessment (ESIA). In most countries, cultural heritage is still a new subject, and it also covers many disciplines. Finding people with the right background and experience is not easy and that will be the case for several more years. This means there should be additional guidance on how companies that are awarded ESIA contracts can be helped to do a good job. It cannot be expected that the best international consultants will be employed, because these are competitive bids and there is a tendency to cut down on the cost to win the bid. ADB can provide national PCR profiles, which will explain what sort of PCR and cultural heritage are likely to run into in a specific country. This will then help identify the appropriate composition of team members that will provide guidance on what sort of impact the different types of projects have on cultural heritage.
- The capacity of communities to monitor is limited. What is missing in the ADB policy is how it empowers, listens, values, and invests in communities in the monitoring process. Those communities who may be affected can be capacitated to effectively monitor the project as part of the financing package.
- A finding on the World Bank was shared wherein the environmental assessment consultants were looking for guidance on how to better achieve the attention to cultural heritage. The World Bank had a very targeted and specific guidance, but it was not used

widely. The issue is how to get the information out to the people who need it. It can be done using electronic technology creatively. Technology can also be used to get the information about cultural heritage out to the contractors and to the subcontractors, so that they know what to look for and can recognize cultural heritage when they find it, specifically the ones that are not on national registers and have local significance. The format of the PCR profiles and the guidance document authored by Ian Campbell can be shared with ADB. The country profiles were done when the World Bank's previous policy was still in effect. The profiles are an example of tools that should be electronically available so that it can be updated and annotated on because this is not static information. Some people who do environmental impact assessments (EIA) have limited knowledge and the communities are experts on cultural heritage. There's also a dichotomy within cultural heritage--there are the academics and the people who maintain national registers, and then there are the communities that have a heritage that will never be on any register of outstanding places, but those community designations of heritage are extremely important in development because they are in the places where development projects happen. This is a very diverse field and there is likely no one person who is trained to deal with all of it, which is why the country profiles will be crucial.

7. Linkages of cultural heritage with other themes

- Integration of cultural heritage into ecosystem services is important. Consider integration as well with the approach to climate change. There has been a lot of progress made in the recognition of cultural heritage by the development banks in the past couple of decades, but it has been a siloed approach and has not been fortified by staff positions in the MFIs nor an aggressive awareness campaign.
- In many ways, assessing intangibles sits at the interface between social impact assessment and cultural heritage impact assessment. Perhaps one of ADB's good practice notes could bring all these issues together and look at interactions between cultural heritage and various other disciplines. These interactions look very different depending on which perspectives are taken. If the interaction between the natural environments and cultural heritage is looked at, different questions are asked than if focusing on natural heritage. There needs to be a dialogue. Extensive and constructive discussions with experts from other disciplines and development of methods require resources that may not be available.
- It is important to not just focus on the tangible cultural aspect, but also on the intangible ones. These are more vital for indigenous peoples (IPs) because they are protecting their indigenous knowledge systems and practices and customary laws.
- Will cultural ecosystem services be considered as part of some intangible heritage or associated with natural types of cultural heritage?

8. Recommendations to improve the policy

- In terms of discovering new facilities, the most important thing is the inventory that should be done by the state.
- Conduct an environmental management plan (EMP) before project approval, as a kind of mitigation measure. In Cambodia, particularly in Siem Reap, urban development has

started to encroach on the ancient archaeological sites such as Angkor Wat, which makes the issue of cultural heritage safeguards in development projects of particular significance. There are issues of development around such sites and in the UNESCO World Heritage Sites.

- On the challenge of lack of recognition, understanding and awareness regarding the internationally designated sites when the projects are proposed, many sites have been identified in Pakistan in 1997 and they are possessed by both the federal government and the provincial government. Out of four, only two provincial governments have developed laws for the coverage of this cultural heritage. The most specific formula and solution is that ADB can display on their website all those projects that have such importance internationally. That is feasible and accessible. Whenever the client and executing agency is participating, ADB can ask them to first check on the website if the project is lying in a sensitive area with respect to the cultural heritage. Requirements needed are identification, prevention of damage to the cultural heritage of any kind, but the most important is restoration. They can be clubbed with commercial activities, both tangible and intangible. If there's a monument, a museum can be created. That can generate money so the monument can be maintained well. For intangible, there are examples in many other areas where local culture generates income, so these areas do not adopt modern culture. If commercialization is not attached to intangible culture, it may not last long because things are adaptive and they keep changing--language, culture, styles, mode of communication.
- Public-private partnerships (PPP) need to be appreciated as well for the safeguard of cultural heritage (both kinds). PPPs can help finance small restoration projects around the vicinity of the cultural heritage sites as well as intangible cultural heritage and the income from the restored sites or preserved cultural heritage would then help support the community. ADB's role may be in providing technical assistance and guidance in working out these PPPs between local government bodies and the private sector.
- Anchoring on the prevention of exploitation for both tangible and intangible cultural heritage, cultural profiling, intensive documentation, and cultural mapping are vital to serve as instruments for identifying, monitoring, and restoration of pristine cultural heritage. The use of geographic information system (GIS) to store huge datasets on cultural heritage will be useful to identify problems, monitor change, respond to events, set priorities, and further understand situations of cultural heritage.
- In various parts of Asia, there are sites that have cultural significance based on the season or time of year, such as pilgrimages to certain religious sites. A seasonal assessment to determine when people are coming and going, information that may not be in the registry of the government, is needed. There is a need for that local know-how of the specialist who's going to do the surveys to not only look at the temporal assessment of the project at hand but, rather, look at the assessment from a broader timeline as to what it means for the people.
- Front loading the assessment is going to be important, and this is a very specific skill set at the ground level to identify social and physical, cultural heritage.

9. Others

- The use of museums to promote cultural heritage and educate the youth to improve ADB's policies was recommended.
- How can cultural treasure be maintained and preserved in a very practical manner while not spending so much?