



SYRIAN MINISTRY OF ENERGY

PUBLIC ESTABLISHMENT FOR TRANSMISSION AND
DISTRIBUTION OF ELECTRICITY (PETDE)

SYRIA EMERGENCY ELECTRICITY PROJECT (SEEP)

Annex F - Cultural Heritage Management and Chance-Finds Procedure (CHMP/CFP)

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LIST OF ACRONYMS & GLOSSARY

Acronym / Term	Full Term	Brief Definition
AoI	Area of Influence	Spatial area where project activities may cause direct or indirect impacts.
CESMP	Construction Environmental and Social Management Plan	Contractor's project-specific ESMP for construction, approved by PETDE/PMT.
CFP	Chance-Find Procedure	Formal procedure to follow when previously unknown cultural heritage is encountered during project activities.
CH	Cultural Heritage	Tangible and intangible cultural resources of archaeological, historical, religious, or aesthetic value.
CHMP	Cultural Heritage Management Plan	Project-level plan and procedures for managing cultural heritage risks and commitments under ESS8.
DGAM	Directorate-General of Antiquities and Museums	National authority responsible for cultural heritage management and approvals in Syria.
E&S	Environmental and Social	Environmental and social aspects and risks of the project.
EPC	Engineering, Procurement, and Construction	Turnkey contractor responsible for construction and commissioning.
ERW	Explosive Remnants of War	Unexploded ordnance and other explosive devices remaining from conflict.
ESCP	Environmental and Social Commitment Plan	Binding commitments agreed between Government and the World Bank.
ESF	Environmental and Social Framework	World Bank framework that includes ESS1–ESS10.
ESMIP	Environmental and Social Management Implementation Plan	ESIA matrix that consolidates mitigation, KPIs, and monitoring across phases.
ESS	Environmental and Social Standard	Individual World Bank standard under the ESF.
GM	Grievance Redress Mechanism	Formal mechanism for receiving and resolving complaints from workers and communities.

OESMP	Operational Environmental and Social Management Plan	PETDE's ESMP for operation and maintenance (O&M).
OHTL	Overhead Transmission Line	400/230 kV high-voltage transmission lines forming SEEP's main assets.
O&M	Operation and Maintenance	Activities related to operation, inspection, and maintenance of assets.
PETDE	Public Establishment for Transmission and Distribution of Electricity	SEEP Implementing Agency and asset owner.
PMT	Project Management Team	PETDE's SEEP implementation team responsible for E&S oversight.
SEP	Stakeholder Engagement Plan	ESIA plan that frames engagement and GMs for SEEP.
UXO	Unexploded Ordnance	Specific form of ERW that may detonate if disturbed.

1. PURPOSE AND SCOPE

This Annex sets out the Cultural Heritage Management and Chance-Finds Procedure (CHMP/CFP) for the Syria Electricity Emergency Project (SEEP). It operationalizes the low-probability but potentially high-significance cultural heritage commitments under ESS8. It implements ESIA commitments, the Environmental and Social Commitment Plan (ESCP), and the Environmental and Social Management Implementation Plan (ESMIP) Cultural Heritage matrix, and operationalizes the “stop-protect-notify-record-resume” approach required under Antiquities Law No. 1/1999 and ESS8.

The CHMP/CFP provides a single, practical framework for:

- Avoiding and minimizing disturbance to known cultural heritage features in the Overhead Transmission Line (OHTL) corridors and substations;
- Managing unexpected (chance) finds of cultural property, archaeological material, human remains, or other heritage assets during intrusive works; and
- Defining roles, communication lines and decision-making steps between Engineering, Procurement, and Construction (EPC) Contractors, Public Establishment for Transmission and Distribution of Electricity (PETDE)/ Project Management Team (PMT), the Owner's Engineer (OE), and the relevant Syrian authorities.

The procedure applies to all SEEP works that involve excavation, foundations, trenching, grading, or other ground disturbance, with emphasis on the construction phase but remaining applicable to maintenance and any future decommissioning that involves intrusive works. It is binding on PETDE/PMT, EPC Contractors and all subcontractors and shall be embedded in Construction Environmental and Social Management Plans (CESMPs), method statements and permit-to-dig systems.

2. OBJECTIVES

The objectives of the CHMP/CFP are to:

1. Prevent damage to known and unknown cultural heritage during SEEP activities.
2. Define clear, practical procedures for handling chance finds, including human remains.
3. Clarify roles and responsibilities among PETDE/PMT, EPC Contractors, PETDE Operation and Maintenance (O&M), Directorate-General of Antiquities and Museums (DGAM), and local authorities.
4. Ensure compliance with Antiquities Law No. 1/1999, World Bank ESS8, and ESIA/ESMIP commitments.
5. Integrate cultural heritage management with related risk areas (Unexploded Ordnance/ Explosive Remnants of War(UXO/ERW), security, GBV/SEA/SH, traffic, community health and safety).

6. Provide templates and guidance for site-specific CESMP/ Operational Environmental and Social Management Plan (OESMP) procedures, forms, and training.

3. APPLICABLE LEGAL AND STANDARDS FRAMEWORK

3.1 SYRIAN LEGAL FRAMEWORK

Key national instruments relevant to chance finds include:

- Antiquities Law No. 1/1999 (DGAM)
 - Declares all antiquities as national property.
 - Requires permits for ground works near recorded sites.
 - Imposes severe penalties for unauthorized excavation, damage, or removal of antiquities.
 - Requires immediate reporting and protective measures in case of chance finds.
- Criminal code and public health regulations regarding human remains (respectful handling, police/authority notification).
- ESIA-relevant decisions (e.g., Law 12/2012, Decision 818/2013 and related sector laws) where they reference cultural heritage and require inclusion of chance-find measures in ESMPs.

DGAM is mandated to review and approve chance-find procedures and monitor protection of archaeological sites during works.

3.2 WORLD BANK ENVIRONMENTAL AND SOCIAL FRAMEWORK (ESF)

Key WB ESF standards guiding this CHMP include:

- ESS1 – Assessment and Management of Environmental and Social Risks and Impacts: requires integrated ESMPs and topic-specific control plans (including this CHMP/CFP Annex).
- ESS4 – Community Health and Safety: addresses public safety, traffic risks, security, and UXO/ERW; relevant where chance finds occur near communities or overlap with ERW risk.
- ESS8 – Cultural Heritage: explicitly requires chance-find procedures for any project involving excavation, construction, or other earthmoving activities, with clear obligations to stop work, notify authorities, and protect finds.

3.3 WBG EHS GUIDELINES

The CHMP/CFP is aligned with:

- WBG General EHS Guidelines (Construction and Decommissioning) – require protection of cultural heritage, consultation with relevant authorities, and procedures to preserve archaeological and historical finds.
- Good International Industry Practice (GIIP) for transmission and substation projects – recommends:
 - Pre-construction screening and buffer zones around known heritage.
 - Archaeological watching briefs in sensitive areas.

- Integrated chance-find protocols with clear lines of communication and documentation.

4. CULTURAL HERITAGE CONTEXT AND RISK SUMMARY FOR SEEP

The ESIA confirms that no registered cultural heritage sites are located within the 500 m Area of Influence (AoI) for the SEEP OHTLs and substations; however, important archaeological and historical assets exist nearby, including the UNESCO-listed Old City of Aleppo, Roman remains near Deir Ali, and the high archaeological density of Al-Lajat Reserve.

Principal risk pathways are:

- Direct damage to known sites if buffers are not respected.
- Disturbance of unrecorded subsurface archaeology during excavation and trenching.
- Opportunistic removal or looting of portable finds (pottery, coins, inscriptions).
- Disturbance of community/religious heritage (shrines, small cemeteries) near work fronts.
- Loss of information value if finds are not properly recorded and archived.

Residual impacts are assessed as Negligible to Minor provided that pre-construction screening, buffer zones, watching briefs and robust chance-find procedures are implemented.

5. ROLES AND RESPONSIBILITIES

Table 5-1 sets out the allocation of functions for implementing the Cultural Heritage Management and Chance-Finds Procedure (CHMP/CFP), clarifying who is responsible for screening, decision-making, liaison with DGAM, on-site response, documentation and monitoring. It makes explicit how PETDE/PMT, PETDE O&M, EPC Contractors, subcontractors, the OE, DGAM and local authorities are expected to work together so that any chance finds are managed promptly, lawfully and in line with ESS8. PETDE advised that the Officer for Social Affairs in the Project Management Team (PMT) will act as Cultural Heritage Focal Point.

Table 5-1. Roles and Responsibilities for CHMP/CFP Implementation

Function	Key CHMP/CFP Responsibilities	Phase	Accountable / Supporting Entity
PETDE / PMT	<ul style="list-style-type: none"> - Approve this Annex and any updates - Ensure it is annexed to all bidding and contract documents - Secure DGAM's concurrence on procedures - Maintain a Heritage Focal Point - Consolidate monitoring data and report to the World Bank. 	All	<ul style="list-style-type: none"> - Accountable: PETDE/PMT Director - Environmental and Social (E&S) Manager - Support: PETDE Heritage Focal Point (PMT Officer for Social Affairs), and Legal
PETDE Heritage Focal Point ¹	<ul style="list-style-type: none"> - Main liaison with DGAM - Review and archive all chance-find records - Verify that CESMPs and OESMP include compliant CFP - Coordinate training content - Participate in serious incident investigations. 	<ul style="list-style-type: none"> - Design - Construction - O&M - Decom. 	<ul style="list-style-type: none"> - Accountable: PETDE/PMT - Support: OE, EPC Contractor
PETDE O&M (Transmission Operator)	<ul style="list-style-type: none"> - Integrate CFP into O&M procedures - Ensure O&M crews are trained - Apply O&M chance-find protocol during maintenance and repairs - Maintain operational heritage records. 	Operation	<ul style="list-style-type: none"> - Accountable: PETDE O&M Director - Support: Heritage Focal Point
Owner's Engineer (OE) / Supervision Consultant	<ul style="list-style-type: none"> - Check that EPC develops and implements a compliant CESMP CHMP including chance-find procedure - Verify pre-construction screening and buffers - Monitor compliance in the field - Advise PETDE on non-conformances and corrective actions. 	<ul style="list-style-type: none"> - Construction - Decom. 	<ul style="list-style-type: none"> - Accountable: OE Team Leader - Support: OE E&S / Archaeological Specialist
EPC Contractor	<ul style="list-style-type: none"> - Prepare and implement a site-specific CHMP and Chance-Find Procedure as part of the CESMP - Engage a Qualified Archaeologist - Ensure all staff, subcontractors and visitors follow the CFP - Maintain records, forms, and chain-of-custody - Report incidents promptly. 	<ul style="list-style-type: none"> - Construction - Decom. 	<ul style="list-style-type: none"> - Accountable: EPC Project Manager - Support: HSE Manager, Site Engineers, Qualified Archaeologist, Security

¹ The Officer for Social Affairs in PETDE's Project Management Team (PMT) will act as Cultural Heritage Focal Point.

Subcontractors	<ul style="list-style-type: none"> - Comply with Contractor CFP and CHMP - Stop work and notify immediately in case of a chance find - Attend induction and toolbox talks. 	<ul style="list-style-type: none"> - Construction - Decom. 	<ul style="list-style-type: none"> - Accountable: Subcontractor Site Manager - Support: Contractor HSE / Supervisors
Qualified Archaeologist (Contractor or OE)	<ul style="list-style-type: none"> - Conduct pre-construction heritage screening and buffer mapping - Design and supervise watching brief in flagged zones - Lead assessment of finds - Advise on protection and recovery - Prepare documentation and handover packages to DGAM. 	<ul style="list-style-type: none"> - Design - Construction - Decom. 	<ul style="list-style-type: none"> - Accountable: EPC Contractor - Support: PETDE Heritage Focal Point, DGAM
DGAM	<ul style="list-style-type: none"> - Review and approve chance-find procedures and CHMP - Provide guidance on treatment, recovery, or in-situ protection of finds - Receive and catalogue artifacts - Participate in investigations as needed. 	All	<ul style="list-style-type: none"> - Accountable: DGAM - Support: PETDE / PMT
Municipalities & Local Leaders	<ul style="list-style-type: none"> - Inform local communities about works near sensitive heritage - Support communication and access arrangements at religious/community sites - Assist in preventing looting - Use Grievance Redress Mechanism (GM) and local structures to channel concerns. 	<ul style="list-style-type: none"> - Construction - O&M 	<ul style="list-style-type: none"> - Accountable: Local authorities - Support: PETDE Community Liaison, EPC
Security Personnel	<ul style="list-style-type: none"> - Support cordoning and protection of chance-find locations - Prevent unauthorized access or removal of artifacts - Act under contractor instructions and Security Management Plan, with no independent excavations or handling of finds. 	<ul style="list-style-type: none"> - Construction - O&M 	<ul style="list-style-type: none"> - Accountable: Contractor Security Manager - Support: HSE, PETDE Security Focal Point

6. DEFINITIONS AND TYPES OF CHANCE FINDS

For SEEP, a chance find is any previously unknown cultural heritage encountered unexpectedly during project activities, including:

- Immovable heritage: foundations, walls, pavements, tombs, canals, rock-cut features, caves, cisterns, masonry, or other structures.
- Movable artifacts: pottery, tools, coins, inscriptions, statuary, architectural fragments, religious objects.
- Human remains: skeletal elements, burials, ossuaries, grave goods.
- Community/religious heritage: undocumented shrines, burial grounds, religious markers, or local sacred trees and features.

Intangible heritage (practices, beliefs) is managed mainly through Stakeholder Engagement Plan (SEP), GM and community engagement but may be linked to tangible features (shrines, graveyards). Where intangible heritage concerns arise, PETDE and the Contractor will coordinate with communities, DGAM and religious authorities.

7. PRE-CONSTRUCTION REQUIREMENTS

The EPC Contractor must, before any ground disturbance, implement the following as part of the CHMP and CESMP:

1. Heritage Screening and Buffer Mapping

- Desk review of ESIA cultural heritage baseline and any updated data from DGAM and municipalities.
- Field walkover by a Qualified Archaeologist for each new work front to:
- Confirm presence/absence of known or visible heritage features.
- Identify high-sensitivity zones (near shrines, cemeteries, known ruins, dense pottery scatters).
- Establish no-go buffers around known or suspected heritage (typical 50 m where space allows, minimum 15 m) and depict on:
- Construction drawings.
- GIS / KMZ corridor maps.
- Site plans and daily work packs.

2. Works-Near-Heritage Method Statement

- Where works must occur within or near sensitivity zones, the Contractor will prepare a method statement to:
- Confirm buffer distances and physical delineation (fencing, markers, signage).
- Restrict equipment type, footing design, and vibration-intensive methods.
- Define supervision and watching-brief requirements.

3. Archaeological Watching Brief Plan

- For fronts classified as archaeologically sensitive, prepare a plan describing:
 - Zones where a Qualified Archaeologist must be present during excavation.
 - Triggers for stopping works if finds or features emerge.
 - Documentation method (log sheets, photos, GPS).
4. Integration with ERW Risk Management
- Heritage screening must be sequenced after ERW non-technical/technical survey (NTS/TS) and clearance, so that archaeologists and crews do not enter contaminated areas.
 - Any metallic object suspected to be ERW must immediately follow the ERW Chance-Find Procedure, not the cultural heritage CFP.
5. Community / Religious Heritage Interface
- Where works are near community shrines, cemeteries or religious sites, the Contractor and PETDE community team will:
 - Notify community leaders and relevant religious representatives.
 - Agree on access arrangements, buffers, and any temporary restrictions.
6. CFP Readiness Drill and Posting
- Before starting excavation, carry out at least one toolbox drill explaining the chance-find steps.
 - Post a simple flowchart (Stop–Protect–Notify–Record–Resume) in Arabic at each site office and relevant fronts.

8. STANDARD CHANCE-FINDS PROCEDURE – CONSTRUCTION

The following procedure applies to all construction fronts where ground disturbance occurs.

8.1 IMMEDIATE ACTIONS (STEP 1-3: STOP-PROTECT-NOTIFY)

1. Stop Work
 - The person who discovers or suspects a cultural find must stop work immediately in that area.
 - The Site Supervisor halts all mechanical and manual excavation in a radius of at least 10 m (or more if needed) from the find.
2. Protect and Secure the Area
 - Do not move, clean, or remove any object or structure.
 - Establish a temporary exclusion zone with cones, tape, or fencing; keep heavy equipment away.
 - Where needed, provide temporary cover (e.g., tarpaulin) to shield from weather or vandalism, without touching fragile elements.
3. Notify
 - Site Supervisor promptly notifies:
 - Contractor HSE Manager and Qualified Archaeologist.

- EPC Project Manager.
- PETDE/PMT and PETDE Heritage Focal Point.
- PETDE/PMT notifies DGAM and, if relevant, local authorities.

8.2 ASSESSMENT AND DOCUMENTATION (STEP 4: RECORD)

4. Initial Assessment by Qualified Archaeologist

- The archaeologist visits the site as soon as practicable to:
 - Confirm whether the find is likely cultural heritage and its apparent type (structure, pottery, human remains, etc.).
 - Recommend adjustment of the exclusion zone radius, additional fencing, and any urgent protection measures.

5. Documentation

- The archaeologist and HSE Manager ensure completion of a Chance-Find Record Form, including at minimum:
 - Date, time, work front, contractor, substation / OHTL ID.
 - GPS coordinates and sketch plan.
 - Description of context (soil, depth, layer).
 - Description of find (materials, size, visible features).
 - Photos (overview and close-up).
 - Names of discoverer and witnesses.

6. Initial Communication to DGAM and PETDE

- PETDE Heritage Focal Point transmits the record, sketch, and photos to DGAM and files the incident in the SEEP E&S register.

8.3 DECISION AND TREATMENT (STEP 5: RESUME UNDER CLEARANCE)

7. DGAM / Archaeologist Determination

- Based on the assessment and in coordination between DGAM, PETDE and the archaeologist, a decision is made to:
- Option A – Avoidance in Situ
 - Establish or expand permanent buffers and adjust work design (e.g., tower relocation, re-routing, or reduced excavation footprint).
- Option B – Controlled Excavation and Recovery
 - Allow supervised salvage excavation, recording and removal of artifacts/structures under archaeologist direction before works resume.
- Option C – No Further Action
 - If the feature is not cultural heritage or is of very low significance, permit safe resumption of works with minimal constraints.

8. Written Clearance to Resume Work

- Contractor must not resume work within the exclusion zone until:

- A written or signed instruction is received from DGAM (or delegated archaeologist) and PETDE/PMT confirming agreed treatment and any conditions.

9. Adjust Design and Method Statements (if needed)

- The EPC Contractor revises relevant drawings, method statements, and CESMP sections to reflect new buffers, re-routed access, or changed construction methods.

8.4 SPECIAL CASE: HUMAN REMAINS

If bones or a burial are suspected:

- Stop work and secure the area with a wider exclusion zone.
- Treat the site with respect and discretion; no photos shared outside E&S / heritage channels.
- Notify PETDE/PMT, DGAM, and the relevant authorities (e.g., police) in line with national practice.
- Await instructions on:
 - Whether remains are archaeological or recent.
 - Required forensic involvement, if any.
 - Whether removal, reburial, or in-situ preservation is appropriate.
- Engage community and religious leaders as directed by authorities to ensure culturally appropriate treatment.

8.5 SPECIAL CASE: SUSPECTED UXO / ERW

If the object may be an explosive device:

- Do not touch or approach.
- Immediately follow the ERW Chance-Find Procedure (recognize-avoid-report) provided by UNMAS.
- Evacuate area and await EOD team; do not treat as a cultural heritage find until it has been declared safe.

9. O&M CHANCE-FINDS PROCEDURE

During O&M, chance finds may arise during minor excavations, fence repairs, or erosion events:

1. Stop and Protect: O&M crew stops work, secures area, and prevents public access.
2. Notify: O&M Supervisor informs PETDE O&M Manager and Heritage Focal Point.
3. Apply Same Assessment and Documentation Steps: PETDE engages the archaeological specialist and DGAM as per Section 8.
4. Update O&M Procedures: Any lessons learned, new buffers, or permanent restrictions are reflected in O&M protocols and access maps.

Where vandalism or damage to known sites is observed (e.g., graffiti, illicit digging), O&M crews will document and report to PETDE, DGAM, and local authorities.

10. DECOMMISSIONING CHANCE-FIND PROCEDURE

If decommissioning is undertaken:

- Re-screen and re-buffer all decommissioning fronts in line with Section 7.
- Maintain watching brief in sensitive zones.
- Apply the same Stop-Protect-Notify-Record-Resume procedure as in Section 8.
- Integrate chance-find provisions in the Decommissioning Cultural Heritage Plan and decommissioning CESMP/OESMP.

11. DOCUMENTATION, CHAIN-OF-CUSTODY AND ARCHIVING

To preserve evidentiary and scientific value, the Contractor and PETDE shall:

1. Maintain a Chance-Find Register
 - Unique ID for each find.
 - Link to work front, coordinates, photos, DGAM communication, and clearance letters.
2. Chain-of-Custody for Movable Items
 - Temporary storage (only if specifically authorized) in a locked container with controlled access.
 - Sign-in/out log for any handling.
 - Same-day or earliest practicable handover to DGAM with a signed Receipt Form.
3. Project Archive
 - PETDE Heritage Focal Point retains digital copies (register, photos, forms, DGAM correspondence) as part of the SEEP E&S documentation.
 - Archive must remain available for audit by World Bank and DGAM.

12. INTERFACE WITH OTHER RISK AREAS

12.1 UXO/ERW RISK MANAGEMENT

- The ERW Chance-Finds Procedure governs all suspect explosive objects; the cultural CFP only applies once EOD confirms an item is non-explosive.
- Coordination between EOD teams and archaeologists is required in high-risk districts.

12.2 SECURITY RISK MANAGEMENT

- Security personnel may be required to help cordon and protect chance-find locations, especially near roads or in conflict-affected areas.
- Security must act in line with the Security Management Plan and ESS4 commitments (proportionality, no excavation or handling by security forces themselves).

12.3 GBV/SEA/SH CONSIDERATIONS

- Some finds may relate to religious or gender-sensitive sites (cemeteries, shrines).

- Engagement with communities on such sites must be conducted with cultural sensitivity, drawing on the SEP and the GBV Action Plan (e.g., appropriate gender representation in meetings, safe spaces for expressing concern).

12.4 COMMUNITY HEALTH, SAFETY AND TRAFFIC

- Chance finds near roads, schools, or public spaces may require temporary rerouting or traffic management measures, coordinated with the Traffic Management Plan (TMP) and Community Health and Safety Plan.
- PETDE and the Contractor will use community GM and SEP channels to inform residents of any sustained restrictions or heritage decisions.

13. TRAINING AND AWARENESS

The EPC Contractor and PETDE/PMT will develop a Cultural Heritage Training and Awareness Plan consistent with the ESMIP (ESIA Table 16-9).

Minimum training requirements:

1. All Workers (Induction + Refreshers)
 - Basic understanding of what constitutes cultural heritage.
 - Key principles: no collection, no photography for personal use, immediate reporting.
 - Simple explanation of Stop–Protect–Notify–Record–Resume steps.
2. Supervisors, Site Engineers, and HSE Staff
 - Detailed CFP steps and forms.
 - Interface with ERW procedures, traffic, and GMs.
 - How to manage community interactions at heritage-sensitive fronts.
3. Qualified Archaeologist and Heritage Focal Points
 - Project-specific requirements (ESIA, ESCP, ESMIP).
 - Reporting obligations to DGAM and World Bank.
4. O&M Crews
 - O&M-specific chance-find steps.
 - Identification of vandalism or looting and proper reporting.

Targets / KPIs (minimum):

- 100% of construction and O&M workforce receive heritage induction before starting work.
- Monthly toolbox talks on heritage at active excavation fronts.
- At least one annual refresher for PETDE O&M staff.

14. MONITORING, KPIS AND REPORTING

Monitoring will follow the ESIA ESMIP – Cultural Heritage matrix (ESIA Table 16-9), with additional detail for this Annex.

14.1 CONSTRUCTION PHASE KPIS AND MONITORING

Table 14-1 summarizes the construction-phase monitoring arrangements for the Cultural Heritage Management and Chance-Finds Procedure (CHMP/CFP), specifying what will be checked, how often, and by whom, so that screening, buffers, watching briefs, chance-find actions, and documentation are consistently implemented and tracked across all work fronts

Table 14-1. Construction Phase Monitoring – Chance-Find Procedure

Monitoring Aspect	Purpose	Frequency	Responsibility	Key Indicator / Trigger
Pre-construction heritage screening & buffer mapping	Confirm known assets identified and buffered before works	One-time per work front	<ul style="list-style-type: none"> - EPC Qualified Archaeologist - OE - PETDE Heritage FP 	<ul style="list-style-type: none"> - Screening record filed - Buffers shown on plans and in field
CFP induction and toolbox talks	Ensure crews can respond correctly to chance finds	Induction + monthly during earthworks	<ul style="list-style-type: none"> - EPC HSE - Site Supervisors 	<ul style="list-style-type: none"> - Attendance logs - Drills completed - CFP posters visible
Chance-find events and handling	Verify correct application of Stop-Protect-Notify-Record-Resume	<ul style="list-style-type: none"> - Per event - Monthly summary 	<ul style="list-style-type: none"> - EPC HSE & Archaeologist - PETDE Heritage FP 	<ul style="list-style-type: none"> - 100% chance finds recorded - 0 works resumed before clearance - 0 unauthorized removals
Chain-of-custody and DGAM handovers	Protect integrity and prevent looting	<ul style="list-style-type: none"> - Continuous when finds handled - Monthly file review 	<ul style="list-style-type: none"> - EPC Archaeologist - PETDE Heritage FP 	<ul style="list-style-type: none"> - 100% finds with signed DGAM receipt - Secure storage in place
Buffer compliance near known / sensitive sites	Prevent encroachment and damage	Daily when working near buffers	<ul style="list-style-type: none"> - EPC Site Engineer - OE 	<ul style="list-style-type: none"> - 0 works or storage within no-go buffers - Method statements implemented
Heritage incident reporting	Capture non-compliance and lessons learned	<ul style="list-style-type: none"> - Continuous - Monthly review 	<ul style="list-style-type: none"> - EPC HSE - PETDE/PMT 	<ul style="list-style-type: none"> - All incidents logged - Corrective actions closed within agreed timeframe

14.2 OPERATION AND DECOMMISSIONING PHASE KPIS

Table 14-2 sets out the monitoring framework for the operation, maintenance and any future decommissioning phases, ensuring that the CHMP/CFP continues to be applied during O&M works and dismantling activities, and that any new chance finds or heritage-related non-compliances are identified, addressed and reported in a structured way over the asset life cycle.

Table 14-2. O&M and Decommissioning Monitoring – Chance-Finds Procedure

Monitoring Aspect	Purpose	Frequency	Responsibility	Key Indicator / Trigger
Access discipline near known sites	Avoid incidental disturbance by O&M crews	Semi-annual patrols	- PETDE O&M - Heritage FP	- 0 encroachment into buffers - Signage intact
O&M chance-find readiness	Ensure crews respond correctly to new finds	Annual refresher	PETDE O&M Supervisor	- 100% O&M staff trained - CFP posters in depots
Decommissioning heritage screening & buffers	Control risks before dismantling	One-time per front	- EPC (Decom.) Archaeologist - PETDE Heritage FP	- 100% fronts screened - Buffers mapped and enforced
Decommissioning chance-find handling	Verify proper CFP alignment under dismantling	Per event; quarterly summary	- EPC (Decom.) HSE & Archaeologist - PETDE Heritage FP	- 100% chance finds recorded and cleared by DGAM before resuming works

14.3 REPORTING

- EPC Contractor: monthly E&S report to PETDE/PMT summarizing heritage screening, chance-find events, DGAM handovers, training, and non-conformances.
- PETDE/PMT: semi-annual E&S progress reports to the World Bank including a section on cultural heritage and CFP performance (number and type of finds, issues, corrective actions).
- Serious incidents (e.g., major damage to a high-value site, serious unauthorized removal, or heritage-related security incident) will be notified to the World Bank within the timeframes defined in the ESCP / ESMP incident reporting protocol.

15. TEMPLATES

The following templates must be prepared by EPC Contractors (for construction and decommissioning) and by PETDE O&M (for operation) in line with this Annex:

1. Template F-1: Chance-Find Notification and Record Form

- Project / Contract / Work Front ID
- Discoverer details (name, role, company)
- Date, time, coordinates, and brief description of activity at time of discovery
- Sketch and photos reference
- Description of find (type, context, estimated size/depth)
- Immediate actions taken (stop, cordon, cover)
- Notified parties and times (Contractor, PETDE, DGAM, others)
- Archaeologist assessment (significance, recommended treatment)
- DGAM / PETDE clearance and conditions
- Date of resumption of works

2. Template F-2: Chance-Find Chain-of-Custody and Handover Form

- Find ID and description
- Temporary storage location (if any)
- Persons responsible for custody and transfer (names, signatures, dates)
- Inventory of items (number, dimensions, materials)
- Handover details to DGAM (date, receiving officer, signature/stamp)

3. Template F-3: Heritage Screening and Buffer Checklist

- Confirmation of ESIA/DGAM baseline review
- Walkover results (features observed, sensitivity rating)
- Buffers defined (radius, coordinates, markers used)
- Watching-brief requirements and zone mapping
- Integration into CESMP, drawings, and work packs

4. Template F-4: CFP Toolbox Talk / Drill Record

- Date, location, work front
- Attendees (names, roles)
- Key messages covered
- Demonstration of Stop–Protect–Notify–Record–Resume steps
- Any gaps identified and follow-up actions

Templates should be included as appendices to the CESMP and OESMP and kept aligned with this Annex.

16. PLAN REVIEW AND UPDATE

This CFP Annex is a living document and shall be:

- Reviewed at least annually by PETDE/PMT and updated if:
- New information on cultural heritage sensitivity emerges.
- DGAM requirements change.
- Significant chance-find events highlight the need for procedural improvements.
- Updated when scope or design changes introduce new risk areas (e.g., new access roads, new substations or tower locations).

Any revision must:

- Remain consistent with the ESIA, the Cultural Heritage ESMIP matrix, and the ESCP.
- Be communicated to all EPC Contractors, subcontractors, OE, PETDE O&M, and relevant authorities (including DGAM).
- Be reflected in updated CESMP/OESMP sections, site-specific method statements, training materials, and monitoring forms.