

Cultural Heritage

Review of the Environmental Impact Assessment Report for
the Ilisu Dam and HEPP

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Executive Summary

- If the Ilisu dam goes ahead, its reservoir would flood an area rich in cultural heritage, including such internationally-acclaimed sites as Hasankeyf. The destruction would not be confined to Hasankeyf but would involve hundreds of other cultural heritage sites throughout the reservoir area. The area to be flooded has immense cultural significance to the local Kurdish population, as well as importance for the international community. With justification, many Kurdish people claim that the Ilisu dam is yet another attempt by the Turkish State to suppress their culture, history and identity.
- Regarding cultural heritage, the Export Credit Agencies will base their decision whether to back the dam on the production of “a detailed plan to preserve as much of the archaeological heritage of Hasankeyf as possible.” This condition of itself falls short of international best practice on assessing and mitigating cultural heritage impacts. The World Bank, World Commission on Dams, and the US Export-Import Bank would require an assessment and mitigation for *all* cultural heritage impacts of the dam.
- Despite its limitations, even the ECAs’ minimal condition on Hasankeyf has not been met. The EIAR fails to provide any evidence of a ‘detailed plan’ to preserve Hasankeyf. In addition, there is no evidence that the condition could be met under present circumstances. Consultation with affected communities cannot take place within the current context of repression of Kurdish cultural and other human rights; institutional arrangements for management of cultural heritage, whereby the military is in overall control; and the EIAR’s failure to assess the extent to which the Ilisu dam is in breach of Turkish law on Hasankeyf.
- Even if the ECAs’ condition on Hasankeyf were met, the Ilisu dam would still be in breach of international best practice on cultural heritage. The EIAR demonstrates that the Ilisu dam fails to meet international best practice standards on cultural heritage on a number of counts, including consultation with affected communities; assessing the full impact of the dam on cultural heritage; and allocating adequate resources to surveys and excavation. In addition, not only does the EIAR demonstrate that international best practice has not been met, but it also fails to show that it could be met under present circumstances of cultural suppression of the Kurds, military control over cultural heritage, and given past experience in Turkey regarding cultural heritage and dams.

Section One – The Cultural Heritage Impacts of the Ilisu Dam

The Ilisu dam's reservoir would inundate 312 km² of the Upper Tigris Valley and its tributaries, submerging forever an area rich in cultural heritage, of great significance both locally and internationally. According to a 1989 study - the most thorough study carried out to date - "developments fundamental to the history of the ancient Near East as a whole took place in these areas and... important cultural information will be lost forever if it is not recovered now."¹

At least 200 and probably many hundreds more sites would face inundation by Ilisu's reservoir. The most famous of these is the town of Hasankeyf, whose history dates back at least 2,700 years. Sited on the Tigris river in a place of enormous strategic significance, over the centuries layer upon layer of civilisations have been interwoven or been built on top of each other. The caves for which the town is justly famous are still inhabited, in a way of life, which is culturally unique. The town hosts a formidable array of monuments, including cave churches, ornate mosques and Islamic tombs, creating an astounding complexity of architectural and religious heritage spanning several civilisations, from the Byzantines and Sassanides through the Omayyads, Abbasides, Hamdanides, Mervanides and Artukids to the Eyyubids and the Ottomans.² Though some parts of the town would remain above water, the site's integrity would be destroyed; as the UK government's Trade and Industry Select Committee noted in May 2001, "The fact has to be faced that the Ilisu dam would mean the end of Hasankeyf."³

As the EIAR acknowledges, however, the entire area to be flooded by the Ilisu dam "comprises hundreds of archaeological sites documenting more than 100,000 years of human occupancy."⁴ A recent article from archaeology journal, *Antiquity*, describes some of the sites threatened; "Sites at risk include several mounds of a kind comparable to Catal Hoyuk, some of which date from at least the pre-pottery Neolithic and may extend through into the post-medieval period (one such example is as much as 40m high); large fortified sites dating to the 'Ubaid, Assyrian, Roman and Byzantine periods respectively, in one example enclosing an area of up to 30 hectares, and in certain cases preserving cultural deposits several metres deep; additionally there are an unquantifiable number of small settlements and structures dating from every period of human history. Particularly notable in this last category, but clearly underrepresented in survey and salvage work, are the sites and materials of the last 500 years that must be of most immediate relevance to any understanding of the more recent histories of those communities now threatened with inundation."⁵

Today, the area where the Ilisu dam will be built is at the heart of the Kurdish regions in Turkey; and the vast majority of those to be affected by the dam are Kurdish. Kurdish people have formed the majority of the population in this area for many hundreds of years, with the result that the more recent cultural heritage of the area is Kurdish.

¹ Algaze, G. (1989) 'A new frontier: first results of the Tigris-Euphrates archaeological reconnaissance project,' p. 255, 1989.

² For further information on Hasankeyf see www.hasankeyf.cjb.net

³ Trade and Industry Select Committee (2001) Twelfth Report, 11th May 2001.

⁴ EIAR, Executive Summary, p. 19.

⁵ Kitchen, W. and Ronayne, M. (2001) 'The Ilisu Dam in Southeast Turkey: archaeology at risk,' in *Antiquity* 75 (2001): 37:8.

According to the EIAR, “Kurdish settlements can be traced after a migration from Western Persia around 2,500 years ago.” (EIAR 3-41.) Yet the cultural heritage of Kurdish people, both early and particularly more recent, has not been documented; the EIAR states, “[The Kurds’] early history as well as their development in the Tigris valley is still far from clear and archaeological work would be needed....” (EIAR 3-41.)

As the EIAR itself admits⁶, no account has been taken by the project developers of the deep historical, cultural and spiritual significance of Hasankeyf and other cultural heritage in the reservoir area to the Kurdish population.⁷ Many Kurdish people and organisations view the Ilisu dam as yet another attempt by the Turkish State to suppress their history, culture and identity. Indeed, central to the controversy surrounding the Ilisu project is this continuing repression of the Kurdish majority in the region by the Turkish State. Over the last century, Kurdish people in the region have been engaged in a struggle for recognition of their cultural, political, and economic rights which have been brutally suppressed. Such repression has a long history and is rooted in policies aimed at subsuming the Kurds into mainstream Turkish society, if necessary by force. (*See Section Three.*) It is a matter of deep concern that the EIAR fails to address this issue or acknowledge its centrality to the assessment of the cultural heritage impacts of the Ilisu dam.

⁶ “The traditional knowledge of the local population does not seem to have been the object of any study. It is thus impossible to determine the heritage that local people value.” (EIAR 3-41.)

⁷ For example, the Kurdish people’s equivalent of *Romeo and Juliet*, the *Mem-o-Zin*, is set in Hasankeyf – the equivalent of Verona.

Section Two – The Export Credit Agencies’ condition on cultural heritage and international best practice

2.1 The ECAs’ condition on cultural heritage

In December 1999, Stephen Byers, then Secretary of State for Trade and Industry, announced four conditions on which the UK government and other export credit agencies would base their consideration of export credit support for the Ilisu dam project. The condition regarding the cultural heritage impacts of the Ilisu dam states that there would be a need to:

“produce a detailed plan to preserve as much of the archaeological heritage of Hasankeyf as possible.”

2.2 The ECAs’ condition and international best practice

Failure to include the detailed plan as part of the EIAR. According to World Bank and World Commission on Dams guidelines, this ‘detailed plan’ should form part of the EIAR for the project itself.⁸ It was initially, however, unclear whether the UK government intended that this detailed plan be produced as part of the EIAR or separately.⁹ In November 2000, the Trade and Industry Department clarified the situation, informing the Trade and Industry Select Committee that “Evaluation of the archaeological and rescue plans for Hasankeyf will form part of the EIAR.”¹⁰ That the UK government only requires the EIAR to provide an “evaluation” of the detailed plan falls short of international best practice.

- **Failure to assess all cultural heritage impacts of the Ilisu dam.** The ECAs’ condition on Hasankeyf in itself falls short of international best practice on cultural heritage impacts. For example, US Ex-Im Bank’s guidelines, with which the EIAR claims to comply¹¹, stress that all cultural heritage impacts of a project should be

⁸ World Commission on Dams (2000) ‘Dams and Development: A New Framework for Decision Making,’ Earthscan, November 2000, p. 283; “IA [impact assessment] should include... Cultural Heritage Impact Assessment”; p. 285, “assessments should culminate in a mitigation plan to address the cultural heritage issues identified through minimising impacts, or through curation, preservation, relocation, collection or recording.” World Bank (1999) ‘Operational Policy Note No. 11.03 Management of Cultural Property in Bank-Financed Projects’, World Bank, August 1999. “Often, scientific study, selective salvage, and museum preservation before destruction is all that is necessary. Most such projects should include the training and strengthening of institutions entrusted with safeguarding a nation's cultural patrimony. Such activities should be directly included in the scope of the project, rather than being postponed for some possible future action...”

⁹ In his February 2000 evidence to the International Development Select Committee, Richard Caborn, then Minister for Trade responsible for the Export Credit Guarantee Department (ECGD), stated that this detailed plan would form part of the awaited Environmental Impact Assessment. “The detailed plan to preserve much of the archaeological heritage needs to be put in place. That will be part of the Environmental Impact Assessment that is now under way...” His statement was, however, then seemingly contradicted by the Director of the ECGD, Vivien Brown, who said that, “There are two separate things going on. They have commissioned an independent Environmental Impact Assessment which will look broadly at the impact the project has on the environment.... There are separate discussions bilaterally with the Turks and with all the Export Credit Agencies involved, including on the preservation of Hasankeyf.” International Development Committee (2000), Sixth Report, “ECGD, Development Issues and the Ilisu Dam. Report,” Proceedings of the Committee, reply to Question 58, page 26, The Stationery Office 6th July 2000.

¹⁰ Cited in Trade and Industry Select Committee (2001) Twelfth Report, 11th May 2001.

¹¹ “...the EIAR has been prepared to comply first and foremost” with Ex-Im guidelines “on the understanding that such compliance would satisfy also the other ECAs and lenders involved.” (EIAR 1-2.)

assessed. US Ex-Im states, “The effects of the project on the presence of *any artifacts or sites of cultural significance* should be evaluated and mitigation measures proposed.” [Emphasis added.]¹² For the government to focus solely on Hasankeyf out of a reservoir area of 312 km² is therefore in breach of these guidelines.

¹² US Ex-Im (1998) ‘Environmental Guidelines: Hydropower and Water Resources Management’, May 15 1998. See also WCD (2000).

Section Three – Assessment of whether the ECAs’ condition has been met

In spite of the fact that the ECAs’ condition is too limited to satisfy international best practice (*see Section Two*), the **EIAR fails to present evidence that even this minimum condition has been met**. In addition, the **EIAR provides no assurance that the condition could be met under present circumstances**.

3.1 Failure to produce a ‘detailed plan’ for Hasankeyf

It is clear from the EIAR itself that **there is at present no detailed plan to preserve as much of the archaeological heritage of Hasankeyf as possible**.

The paucity of information about Hasankeyf and lack of planning for its preservation to date is evidenced by the final section of the EIAR, which recommends complementary studies. **The EIAR explicitly acknowledges that without such further recommended studies, no plan can be developed for Hasankeyf; “Many inventories should be achieved before definitive actions can be devised for Hasankeyf.”** (EIAR 7-11.)

As spelled out in EIAR, these include:

1. A detailed map of Hasankeyf. The EIAR states, “It is important to know what exactly will be flooded and what will remain above water.” (EIAR 7-11.)
2. A study on the stability of the cliffs on which Hasankeyf citadel is built, to guard against erosion and landslides. (EIAR 7-11.)
3. An archaeological survey “of all the area of the lower and upper towns... in order to know more precisely the history of the town and the location of archaeological remains.” (EIAR 7-11.)
4. A study on the stability of monuments. (EIAR 7-12.)
5. A study of all monuments and a feasibility study deciding which monuments can be relocated and how. (EIAR 7-12.)
6. Consultation with Hasankeyf residents about their graveyards. (EIAR 7-12.)¹³

It is thus clear that the ECAs’ condition, to “produce a detailed plan to preserve as much of the archaeological heritage of Hasankeyf as possible,” has not been met. The EIAR itself has failed to produce a detailed plan, in breach of international best practice (see Section Two), and it is evident from the above that no such detailed plan yet exists.

For a ‘detailed plan’ to be adequate, at a minimum it would be based on extensive knowledge of the existing site; that the EIAR could point to exactly which parts of the site would be lost to the reservoir; that it could show which parts would be salvaged and how; that an adequate time-scale for survey and excavation would be given; that local people would have been consulted and involved in decisions about their cultural heritage; and that a sufficient budget and secured funding would be in place. In fact, none of these conditions has been met, on the evidence presented by the EIAR itself.

¹³ The EIAR notes that three studies commenced in Hasankeyf in 1999: a feasibility for relocating the monuments, a mapping of the site and monuments, and geotechnical studies. Given the EIAR’s recommendations above, such beginnings do not go far enough. The EIAR itself also acknowledges that current resources allocated are insufficient, as it states, “The extent of the site commands more means in time and money.” (EIAR 7-16.)

1. **Insufficient knowledge of site:** The EIAR admits that **knowledge of the site is deficient at present**, “The archaeological site is very poorly known...” (EIAR 3-46.) This lack of archaeological knowledge about Hasankeyf is in part due to the fact that very little excavation has been carried out to date. The EIAR mentions excavations taking place between 1988-1990 and from 1998 to the present; however, the EIAR admits that “Up to now less than 5% of the site has been excavated.” (EIAR 3-50.) A key feature of Hasankeyf is the way civilisations have developed layer after layer in the Upper and Lower towns over thousands of years; what is visible on the surface represents only a part of the archaeological features of the site. Based on such limited excavations as have taken place to date, no credible plan “to preserve as much of the archaeological heritage of Hasankeyf as possible” can possibly be developed.
2. **Insufficient time for study and excavation:** Because of the **limited time now left to study and excavate Hasankeyf** – just seven years from the beginning to the end of the construction period – the EIAR is forced to admit that mitigation measures will have to be developed as work progresses.¹⁴ Professor Olus Arik, the Turkish head of excavations at Hasankeyf, stated in late 2000 that, “we need a minimum of fifty years here and we have just nine or ten – unless of course we can stop the dam.”¹⁵ Such salvage archaeology, driven by the dam implementation schedule rather than archaeological dictates, caused a local archaeologist to tell a recent fact-finding mission to the region, “We don’t call this salvage archaeology but treasure-hunting.”¹⁶ Again this is a clear indication that no adequate plan to preserve Hasankeyf is yet in place.
3. **Inadequate planning:** As a measure of the complete **inadequacy of planning for Hasankeyf** as presented in the EIAR, only *four monuments* in the whole site to be inundated “have been identified that can be relocated” (EIAR 5-8). The EIAR states in its Executive Summary, “It is also recommended to thoroughly plan the relocation of the most important monuments of the Lower Town of Hasankeyf which will be submerged.” (EIAR EXE-11.) That no such plan yet exists is of urgent concern.
4. **Inadequate mitigation measures:** The **mitigation measures** proposed by the EIAR – which, it must be remembered, are not based on an adequate survey – are completely insufficient. These measures include relocating four monuments, turning the remaining Upper Town into an open-air museum, and displaying a “model of the entire town” in one of the remaining buildings. (EIAR 5-9.) Merely to suggest mitigation in the form of a ‘model’ of Hasankeyf shows a vast insensitivity to the history and culture of the region. Such mitigation measures indicate that there is no “plan to preserve as much of the archaeological heritage of Hasankeyf as possible”.
5. **Failure to provide a budget for plan implementation:** Any “detailed plan” would of necessity include **a budget and an indication of who would provide funding**. This the EIAR fails to do. At the end of its discussion of mitigation measures for Hasankeyf, the EIAR states, “A budget covering the expenses related to relocation and restoration of monuments and archaeological remains is presented in Section

¹⁴ EIAR 5-8, “The mitigation measures considered at this time will need to be revised and optimized along [sic] the information gathering process and during the inventories listed in Section 7.5.”

¹⁵ Young, P. (2000) ‘Hasankeyf: a city in peril’ *History Today*, 50 (11): 3-4.

¹⁶ Ilisu Dam Campaign Fact-finding Mission to the Ilisu region, 10th-17th June 2001. Interview with an archaeologist who asked to remain anonymous for fear of State reprisal.

5.4.7.3.” (EIAR 5-9.) However, *this section does not exist*. Even allowing for a typing error, it is impossible to find in the EIAR a budget specifically for the preservation of Hasankeyf. The only budget mentioned in the EIAR is in Section 7.5.5.1. This budget is that of the salvage project for both the Ilisu and Carchemish reservoirs and is therefore not specifically allocated for Hasankeyf. Furthermore, as the EIAR admits, so far most of these resources have *not* been directed at Ilisu; “The budget of the first two years was however largely devoted to the Carchemish reservoir area.” (EIAR 7-13.) According to Professor Olus Arik, head of the excavations at Hasankeyf, the entire budget for the first two years was only £76,000 of which just £15,000 was allocated to Ilisu. Professor Arik compares this to a glass of water in the desert.¹⁷ The UK Parliament’s Trade and Industry Select Committee has noted Professor Arik’s difficulties in securing funding for even the limited excavation work he is carrying out at Hasankeyf; as the Committee indicated in May 2001, “In 1999 Professor Arik had sought further funding but had received only half of his requests.”¹⁸ That no budget is yet in place for Hasankeyf is in breach of international best practice.¹⁹

- 6. Lack of consultation.** There is no way a detailed plan could be produced without the informed consent and participation of the local population and cultural organisations. The EIAR admits that **no consultation with affected communities about cultural heritage has yet taken place**; “Some of the monuments or buildings will have to be relocated so as to conserve much of the heritage that the local people value. Since no study pertaining to this heritage exists, it is not yet possible to pinpoint the elements to be conserved.” (EIAR 5-7.) In addition, it must be noted that **such failure to inform and consult with local affected communities is in breach of international best practice**. For an exploration of this issue, *see Section 4.1*.

3.2 Why the ECAs’ condition cannot be met

Not only does the EIAR fail to present evidence that the ECAs’ condition on Hasankeyf has been met, the EIAR provides no assurance that the condition **could be met under present circumstances**.

- 1. Suppression of cultural rights of the Kurdish people.** Over the last century, Kurdish people in the region have been engaged in a struggle for recognition of their cultural, political, and economic rights which have been brutally suppressed. Central to the controversy surrounding the Ilisu project is this continuing repression of the Kurdish majority in the region by the Turkish State. Such repression has a long history and is rooted in policies aimed at integrating the Kurds into mainstream Turkish society, if necessary by force. To date, the Turkish State’s policy of assimilation has involved widespread human rights abuses, including extra-judicial killing, the imprisonment, rape and torture of Kurdish people, the brutal suppression

¹⁷ Young, P. (2000) ‘Hasankeyf: a city in peril’ *History Today*, 50 (11): 3-4.

¹⁸ Trade and Industry Select Committee (2001) Twelfth Report, 11th May 2001.

¹⁹ World Bank (1999) ‘Operational Policy Note No. 11.03 Management of Cultural Property in Bank-Financed Projects’, World Bank, August 1999. “In some cases, the project is best relocated in order that sites and structures can be preserved, studied, and restored intact in situ. In other cases, structures can be relocated, preserved, studied, and restored on alternate sites. Often, scientific study, selective salvage, and museum preservation before destruction is all that is necessary. Most such projects should include the training and strengthening of institutions entrusted with safeguarding a nation’s cultural patrimony. Such activities should be directly included in the scope of the project, rather than being postponed for some possible future action, and the **costs are to be internalized in computing overall project costs.**”

of local Kurdish customs and culture, the outlawing of the Kurdish language and the forced evacuation of Kurdish villagers.²⁰ These abuses are well documented in the 200 judgements of the European Court of Human Rights against Turkey over the past five years.

Ilisu must also be viewed within the larger context of the Southeast Anatolia Project (GAP), which since its inception has been underpinned by the Turkish State's long-pursued policy of forced assimilation of the region's Kurdish majority into mainstream Turkish society and culture. Indeed, the Turkish government's official publicity for the project explicitly states that the GAP is intended to "*dramatically change the social and cultural make-up of the region.*"²¹

Emergency Rule has been in effect in this region since 1987 and was recently renewed in July 2001. As Professor Hall, President of the World Archaeological Congress, stated in a letter to Richard Caborn, then Minister for Trade, "... no amount of money and time spent on this project could deal with cultural rights, as an aspect of the human rights of the local population, in the circumstances of emergency rule prevailing in the region at present."²²

In addition, it must be noted that such failure to inform and consult with local affected communities is in breach of international best practice. For a full exploration of this issue, *see Section 4.1.*

- **Failure to document cultural heritage:** It is only within this **context of State of Emergency Rule and cultural and political repression in the region**, that it becomes clear why there is a lack of any attempt to uncover and document the recent cultural heritage of the area to be flooded by the Ilisu dam. Far from being prepared to recognise the different histories of the region, the dam's proponents are actively ignoring Kurdish cultural heritage. For example, the organisation in charge of surveying the affected area, TACDAM, has refused to meet with or consult organisations with knowledge of the various cultural histories of Hasankeyf.²³ A resident of Hasankeyf told a recent fact-finding Mission to the region, "They never ask any questions about the stories of the place or the people."²⁴
- **Suppression of Kurdish cultural rights and history:** Many local people and organisations have repeatedly expressed the opinion that the Ilisu dam is part of the Turkish State's strategy of further **suppressing the cultural rights and history of Kurdish people**. A local human rights lawyer told a fact-finding Mission to the region, that he considered the aim of the Ilisu project to be "to destroy everything which belongs to Kurdish people living in the area." Another interviewee told a human rights fact-finding Mission, "Official ideology only recognises cultural

²⁰ KHRP et al (2001) 'If the River Were a Pen... The Ilisu Dam, the World Commission on Dams and Export Credit Reform,' KHRP, London, March 2001, p16. See also 'A History of Repression', *ibid*, p16.

²¹ Cited in KHRP et al (2001) 'If the River Were a Pen... The Ilisu Dam, the World Commission on Dams and Export Credit Reform,' KHRP, London, March 2001, p77.

²² Hall, M. (2001), letter to Richard Caborn, World Archaeological Congress, 2nd May 2001.

²³ The Save Hasankeyf Platform told a recent fact-finding mission to the region, "TACDAM arrived with a pre-prepared project. They did not invite us to their presentation [held in Hasankeyf] so we went anyway with the media and argued with them in front of the cameras, saying this was merely a PR exercise."

²⁴ Fact-finding Mission to the Ilisu region, June 2001. Interviews with the Save Hasankeyf Platform, Hasankeyf residents and the Hasankeyf Volunteers.

elements that were created under the ‘Turkish’ regime and chooses to ignore aspects of significance to the Kurdish population.”²⁵

- **Climate of intimidation and repression:** In addition, the climate in which archaeologists work in the Ilisu region – under State of Emergency Rule and with restrictions on the activities of state officials – makes **adequate archaeological work extremely difficult**. When a recent fact-finding Mission talked to an archaeologist in the region, the interview had to be halted suddenly for fear of State retaliation.²⁶ A human rights lawyer told the same Mission that academics such as archaeologists cannot express freely their own opinions about Ilisu. If they dare to question the State’s policies, academics may have the parameters of their research limited, lose their jobs, be sent into exile or prosecuted. In a situation where routine archaeological procedure relating to the Ilisu project may not be discussed openly and where cultural organisations, far from being consulted, are repressed, it is impossible for archaeologists and local communities to exchange views and information freely.
1. **Military control of cultural heritage:** Given this context of repression of the cultural and other human rights of the Kurdish population, it is of extreme concern that the **State of Emergency rule in the region places the military in control of cultural heritage protection and evaluation**. Usually this role would be assigned to the Ministry of Culture; however, as the EIAR notes, because the area is controlled by the Turkish army, Article 10 of the 1983 Turkish law: ‘Legislation for the Conservation of Cultural and Natural Property’ (act no. 2863) applies. (EIAR 3-37.) Article 10 states that, “The Ministry of National Defense is responsible for protecting and evaluating cultural and natural property administered by the Ministry of National Defense or property existing in military zones or near national borders.” The Article requires a protocol to be signed between the Ministries of National Defense and Culture to determine the principles to be adopted for the protection of cultural heritage. The EIAR notes that “No such protocol has yet been prepared for the study area.” (EIAR 3-38.) In addition, the Office of the Commander-in-Chief- of the Army is responsible for granting licences for studies and excavations in the area.

The EIAR does not then go on to discuss the implications of such a situation for cultural heritage studies and excavations. However, it is the military that has been involved in the conflict with Kurdish people in this region since 1984. There have been numerous instances of direct suppression of Kurdish cultural expression by the military regime.²⁷ Local people told a fact-finding mission to the Ilisu region in June 2001 that the Ministry of Culture granted permits to archaeologists for digs at Ziyaret Tepe and Diktepe, which local people believe were then blocked by the local military so that no excavations could go ahead.²⁸ **For the military to be responsible for permitting studies to look, for example, at how cultural heritage is valued and**

²⁵ KHRP (1999) ‘The Ilisu Dam: A Human Rights Disaster in the Making’, KHRP, London, November 1999.

²⁶ Fact-finding Mission to the Ilisu region, June 2001. Interviews with an archaeologist, who asked to remain anonymous for fear of State reprisal, and with the Diyarbakir Human Rights Association.

²⁷ For example, only in the last year, three Kurdish cultural organisations have been closed under State of Emergency rule – the Dicle Women’s Cultural Centre in Diyarbakir, the Mesopotamia Cultural Centre and the METERIS Cultural Centre – and in March 2000, a conference organised by the NGO Women’s Platform Diyarbakir on ‘Consciousness of History’ was refused permission. Fact-finding Mission June 2001, interview with HADEP Women’s Branch.

²⁸ Fact-finding Mission to the Ilisu region, June 2001.

understood by local Kurdish people – studies recommended by the EIAR – is not only farcical, it is contrary to the very nature of evaluating local cultural heritage and a direct repression of minority cultural rights.

- 2. Failure to indicate potential violation of national law:** The EIAR fails to deal with the key issue of whether the flooding of Hasankeyf would violate Turkish national law. **ECAs considering backing the project are prohibited under their own guidelines from supporting activities that contravene host country laws.**²⁹

According to the guidelines of the United States' export credit agency, Ex-Im Bank, with which the EIAR states that it "has been prepared to comply first and foremost on the understanding that such compliance would satisfy also the other ECAs and lenders involved," (EIAR 1-2), state that "Ex-Im Bank will assume that host country regulatory environmental standards and procedures as applicable to the proposed project are met."³⁰ **The EIAR fails to provide any assurance that Turkey's national laws regarding Hasankeyf have been met.**

An international fact-finding mission to the Ilisu region in October 2000 was told by Turkish lawyers "that flooding Hasankeyf would violate Turkish law." One prominent lawyer interviewed by the Mission stated: "The government cannot build this project legally because Hasankeyf is a Class 1 protected area."³¹ The Turkish government listed Hasankeyf as a 'first degree' archaeological site in 1978 (Decision GEAYK – A 1105). Subsequently, in 1981, Hasankeyf was scheduled as a first and second degree site and 22 monuments were listed. Under Turkish law, flooding the town would require the special permission of the Diyarbakir Council for the Protection of Cultural and Natural Wealth, which is responsible for local sites protected under the law. The Mission's report continues, "Without permission from this council, argued the lawyer, the flooding of Hasankeyf would be illegal. The council, which is appointed by the Minister of Culture, has not yet given permission to build the dam."³²

In this regard, it is of significance that a legal case has already been lodged by an Istanbul-based lawyer, Murat Cano, contesting the legality of the dam under Turkish domestic law. The claim centres on the proposition that the Ilisu reservoir would flood an area of enormous global historical significance. However, in the section dealing with 'Legal Aspects' of cultural heritage in Turkey (EIAR 3.2.2.1), the EIAR fails to mention the 1978 law or the court case being fought. Only later does the EIAR mention, without any legal details, that "[Hasankeyf] has been registered as an archaeological site since March 1978" (EIAR 3-45), and that "Legal proceedings related to Hasankeyf were started in March 1999 against DSI by 2 persons. The Court dismissed the case on technical ground... [sic]." (EIAR 3-46.) In fact the court case continues to this day and has recently been referred back from the Diyarbakir courts to Ankara.³³

²⁹ For example, the German ECA, Hermes, states in its guidelines, "[t]he project has to meet the environmental standards of the host country." Hermes (2001) 'Official Export Guarantee Scheme of the Federal Republic of Germany: Guiding Principles Environment.

³⁰ US Ex-Im (1998) 'Environmental Procedures and Guidelines', April 2nd 1998.

³¹ Interview with members of Diyarbakir Bar Association, October 2000.

³² KHRP et al (2001) 'If the River Were a Pen... The Ilisu Dam, the World Commission on Dams and Export Credit Reform,' KHRP, London, March 2001, p73.

³³ Fact finding mission June 2001: interview with lawyer Murat Cano, June 2001, Istanbul.

The legality under Turkish law of flooding Hasankeyf is a crucial issue which will have direct bearing on whether or not ECAs are allowed under their own guidelines to back the dam. Any ‘detailed’ plan’ regarding Hasankeyf should have addressed this issue seriously and in detail, not simply have dismissed it, as the EIAR has done.³⁴

3. Failure to address history of State neglect of Hasankeyf: The EIAR lists a number of monuments in Hasankeyf which are in a state of disrepair (EIAR 4-79.) Local officials have repeatedly told fact-finding missions to the region that Hasankeyf has suffered from State neglect and lack of investment since being declared a protected site in 1978, leading observers to conclude, “the Turkish government has taken no observable steps to discharge the responsibility which the original designation laid upon it, to protect or conserve the site.”³⁵ The 1978 legislation has amounted to a planning blight on Hasankeyf, since no one has been permitted to make any efforts to protect or conserve the site in the intervening period. The EIAR does not, however, address the State’s neglect or the planning blight, but rather states that the only hope for conservation now lies with the dam; “The preservation measures of the Hasankeyf site considered in the frame of the Project implementation will allow to [sic] permanently protect these monuments from an irremediable destruction.” (EIAR 4-79.) For the EIAR to state in this way that the only way to preserve Hasankeyf is to flood large parts of not only **illogical, it is hugely misleading**. Clearly there are myriad ways in which the Turkish State could protect Hasankeyf if it had the political will to do so.

4. Inadequacy of partial salvage: It must be noted that **local people and campaigners find the condition “to produce a detailed plan to preserve as much of the archaeological heritage of Hasankeyf as possible” inadequate**. Regarding the proposed removal of monuments and artefacts to a museum, a state official and member of local environmental organisation, CEKUL, told a recent fact-finding Mission to the region, “This is not like the Aswan project. The artefacts there were made by human hands, but it’s different here with Hasankeyf. Firstly, the natural elements to the site – the caves – are one example of that. And secondly, the cultural layers which lie beneath the surface.” The Hasankeyf Volunteers³⁶ told the same Mission, “We kept telling them that they cannot transport the whole city to some other place. Because Hasankeyf is a whole, you cannot fracture it, you cannot cut it into pieces, there is an organic wholeness there.”³⁷ The Chamber of Architects in Diyarbakir, a professional association with many archaeologist members, told a previous Mission, “the historical sites have a meaning if

³⁴ There is also a question as to whether the Turkish and UK governments would be in breach of the European Convention for the Protection of Archaeological Heritage (revised, Valetta 16 January 1992). Both countries signed the Convention in 1992; it came into force in Turkey in November 1999 and in the UK in March 2001. The Convention provides a unifying framework designed to prevent the abuse of archaeological heritage, either by neglect or through illicit exploitation.

³⁵ KHRP (1999) ‘The Ilisu Dam: A Human Rights Disaster in the Making’, Kurdish Human Rights Project, November 1999.

³⁶ The Hasankeyf Volunteers was founded in 1999 by 200 local journalists, artists, doctors and lawyers to campaign to save Hasankeyf.

³⁷ Fact-finding Mission to the Ilisu region, June 2001.

people living in them don't move away; it is important to say that Hasankeyf should be *completely* saved.”³⁸

³⁸ KHRP (1999) 'The Ilisu Dam: A Human Rights Disaster in the Making', Kurdish Human Rights Project, November 1999. In addition, the many families who still live in the caves in Hasankeyf risk not being compensated for their loss. The rights of these people, “who currently live in caves or other forms troglodyte housing”, or who use them as shelter for their animals, are vulnerable; however, rather than providing a full description of those people's rights, the EIAR merely states that “Current laws and procedures do not seem to take those types of losses into account.” (EIAR 5-16.)

Section Four – The Ilisu dam and international best practice on cultural heritage

As noted, the EIAR fails to meet the ECAs' condition on cultural heritage, which in itself falls short of international best practice (*see Section 2.1*). Yet even if the EIAR did contrive to meet the ECAs' condition on Hasankeyf, the Ilisu dam project would still be in breach of international best practice on cultural heritage.

The EIAR demonstrates that the Ilisu dam fails to meet international best practice standards on cultural heritage on a number of counts, including consultation with affected communities; assessing the full impact of the dam on cultural heritage; and allocating adequate resources (time and money) to surveys and excavation.

Again, not only does the EIAR demonstrate that international best practice has not been met, but it also fails to show that best practice can be met in present circumstances.

4.1 International best practice on cultural heritage

1. Consultation with affected communities.

Key international cultural and archaeological organisations, as well as many treaties and guidelines now recognise the right of project affected people to be informed and consulted regarding cultural heritage.

For example, the International Council on Monuments and Sites (ICOMOS) stipulates that "... elements of the archaeological heritage constitute part of the living traditions of indigenous peoples, and for such sites and monuments the participation of local cultural groups is essential for their protection and preservation". ICOMOS' charter further states, "... active participation by the general public must form part of policies for the protection of the archaeological heritage. This is essential where the heritage of indigenous peoples is involved. Participation must be based upon access to the knowledge necessary for decision-making ..."³⁹

The European Association of Archaeologists, whose aims include, "to promote proper ethical and scientific standards for archaeological work" endorses ICOMOS' Charter⁴⁰. Furthermore, the EAA Code of Practice states, "archaeologists will take active steps to inform the general public at all levels of the objectives and methods of archaeology in general and of individual projects in particular, using all the communication techniques at their disposal."

The guidelines of the United States' export credit agency, with which the EIAR claims to comply, also endorses consultation on cultural issues; "The Bank encourages public participation and consultations with local groups and NGOs as a

³⁹ ICOMOS (1990) 'Charter for the Protection and Management of the Archaeological Heritage.'

⁴⁰ European Association of Archaeologists (1997) Code of Practice, Ravenna, Italy, 27th September 1997; "All archaeological work should be carried out in the spirit of the *Charter for the management of the archaeological heritage* approved by ICOMOS (International Council on Monuments and Sites) in 1990."

source of information on the environmental and *sociocultural aspects* of projects involving dams and reservoirs with significant impacts. [Emphasis added]⁴¹

The International Finance Corporation, an arm of the World Bank, states in its policy on cultural property, "If cultural property is to be impacted, detailed plans must be developed, justified, and *openly debated*." [Emphasis added.]⁴²

The EIAR itself accepts the need for consultation and participation of local communities and affected people about cultural heritage. The EIAR recommends that cultural heritage surveys among the local population be organised, and admits "Since many persons will be relocated, the loss of traditional knowledge would be irretrievable." (EIAR EXE-19.)

2. The wider cultural heritage impacts of the Ilisu dam's reservoir

The World Commission on Dams, the United States export credit agency, US Export-Import Bank, and the World Bank are among the international bodies which call for a full assessment of projects' cultural heritage impacts

The World Commission on Dams' Guideline for Good Practice no. 5 states, "IA [impact assessment] should include... Cultural Heritage Impact Assessment" and such "assessments should culminate in a mitigation plan to address the cultural heritage issues identified through minimising impacts, or through curation, preservation, relocation, collection or recording."⁴³ The International Finance Corporation, an arm of the World Bank, states, "If cultural property is to be affected, detailed plans must be developed, justified and openly debated.... Cultural property issues must be included in project costs and dealt with from the outset of the project."⁴⁴ And US Ex-Im guidelines stipulate that all cultural heritage impacts of a project should be assessed, "The effects of the project on the presence of *any artifacts or sites of cultural significance* should be evaluated and mitigation measures proposed." [Emphasis added.]⁴⁵

There are grounds for believing that the UK government has accepted the importance of the wider cultural heritage impacts of Ilisu's reservoir. In a February 2001 letter to the World Archaeological Congress, Richard Caborn, Minister responsible for ECGD, states, "the conditions set out by Stephen Byers in December 1999 include a requirement that a detailed plan be produced to preserve as much of Hasankeyf's archaeological heritage as possible. In fact, we

⁴¹ US Ex-Im (1998) 'Environmental Guidelines: Hydropower and Water Resources Management', May 15 1998.

⁴² IFC (1999) 'Policy on Cultural Property', International Finance Corporation, 1999. In addition, the World Bank states, "Often, scientific study, selective salvage, and museum preservation before destruction is all that is necessary. Most such projects should include the training and strengthening of institutions entrusted with safeguarding a nation's cultural patrimony. Such activities should be directly included in the scope of the project, rather than being postponed for some possible future action...." World Bank (1999) 'Operational Policy Note No. 11.03 Management of Cultural Property in Bank-Financed Projects', World Bank, August 1999.

⁴³ World Commission on Dams (2000) 'Dams and Development: A New Framework for Decision Making,' Earthscan, November 2000, p. 283 and p. 285.

⁴⁴ IFC (1999) 'Policy on Cultural Property', International Finance Corporation, 1999.

⁴⁵ US Ex-Im (1998) 'Environmental Guidelines: Hydropower and Water Resources Management', May 15 1998.

know that the Salvage Project for the archaeological heritage of the area to be inundated is by no means confined to Hasankeyf.”⁴⁶

The UK’s Select Committee on Trade and Industry recommended to the government in May 2001 that the cultural heritage impacts of the reservoir should also be taken into account, stating, “We consider that the condition [on Hasankeyf] should be extended to cover the whole of the reservoir area and land affected by it”⁴⁷

The Secretary of State for Trade and Industry, in her July 2001 response to this recommendation, answered, “We have not yet seen a full salvage plan for the Ilisu Reservoir. However, the reports of the archaeological activities covered by the Salvage Project for the Archaeological Heritage of the Ilisu and Carchemish Dam Reservoirs for 1998 and 1999 do include the reservoir area and not just Hasankeyf. We are still discussing how such a plan might be reviewed when we see it.”⁴⁸ This would indicate that the UK government does indeed accept the importance of cultural heritage beyond Hasankeyf.

The EIAR does not confine itself solely to the issue of the inundation of Hasankeyf, but acknowledges that cultural heritage impacts extend to the entire 312 km² reservoir area. “The area to be impacted comprises hundreds of archaeological sites documenting more than 100'000 years of human occupancy. The area as been instrumental in the first human endeavors to domesticate plants and animals and in the establishment of the first permanent settlements. It is situated at the limits of Anatolian, Mesopotamian and Persian Empires and civilizations.” (EIAR EXE-19.)

4.2 Breaches of international best practice on cultural heritage

- 1. Failure to consult affected communities on cultural heritage:** The EIAR acknowledges that consultation with affected communities has not occurred, “The traditional knowledge of the local population does not seem to have been the object of any study. It is thus impossible to determine the heritage that local people value.” (EIAR 3-41.)⁴⁹
- 2. Failure to determine full extent of cultural heritage impacts:** The EIAR acknowledges that **very little is known about the potential reservoir area**, and that future studies could reveal major findings, as has happened in the past; “The study area seems to have been at or outside the limits of most of the successful empires and kingdoms in Anatolia, Persia and Mesopotamia. But since no extensive research has been done so far, it is impossible to be absolutely affirmative. On the contrary, a new kind of sites [sic] may be discovered in the study area, sites documenting the

⁴⁶ Richard Caborn (2001), letter to Professor Martin Hall, World Archaeological Congress, 28th February 2001.

⁴⁷ Trade and Industry Select Committee (2001) Twelfth Report, 11th May 2001.

⁴⁸ Secretary of State for Trade and Industry (2001) First Special Report ‘Government Observations on the Following Reports from the Trade and Industry Committee (Session 2000-01): ... 6. Ilisu Dam’, 20 July 2001, HC 197.

⁴⁹ The EIAR then seemingly contradicts itself, by referring to a team from Dicle University which “has initiated a research program on the cultural heritage of the living people.” It goes on to say, however, that “There is no detail available about this program yet.” (EIAR 7-15.)

peculiarities of the fringe, particularly in the time of the Urartu Empire (2'900-2'600 BP) and the Medes (2'750-2'300 BP). One site discovered in 1988 at the confluence of the Botan River with the Tigris proved to be a Roman defense work. It seems to have been an outpost on the frontier between the Roman-Byzantine Empire and the Persian Empire.” (EIAR 3-45.)

- **Lack of an adequate survey.** Such failure in part arises from the fact that the Ilisu reservoir area, which totals approximately 37,750 hectares (ha) (EIAR 3-51), has **not yet been adequately surveyed for cultural heritage**. The main archaeological study completed within the reservoir area to date, and on which current studies are based, is the Algaze survey, which took place between 1988-1990.⁵⁰ At this time, war was raging in the region, and the majority of the reservoir area was not accessible for security reasons. Hence, according to the EIAR, Algaze only surveyed 7,000 ha out of the total 37,750 ha reservoir area: 18.5% or less than a fifth of its total area. (EIAR 3-51.) The EIAR calls into question the extent even of this inadequate study, stating “questions still remain about its [Algaze’s study’s] amplitude.”⁵¹
- **Time-frame inadequate.** The time-frame suggested by the EIAR to survey the reservoir area is completely inadequate. The EIAR states, “Since the archaeological information about the reservoir area is far from complete, it is recommended to perform a detailed survey of the reservoir area during the 7 years of the construction and to select archaeological sites to be investigated and documented before the start of impounding. These investigations should identify and save artifacts as far as possible.” (EIAR EXE-11.)

The EIAR proposes to **survey the rest of the reservoir area in a mere two years**. (EIAR 7-9.) The EIAR makes clear that it recommends a two year period not because this would be sufficient time, rather “The archaeological surveys should be completed in no more than two years so that enough time can be devoted to archaeological excavations before reservoir impounding.” (EIAR 7-9.) Archaeological surveys of such an important area should not be rushed simply because imminent inundation is assumed; such an approach gives no proper weight to cultural heritage concerns in considering whether or not the dam project should go ahead.

The two years recommended by the EIAR are wholly insufficient to make either an accurate or a complete survey of what would be lost to Ilisu’s reservoir. For means of comparison, to demonstrate the inadequacy of such a time-frame, it is possible that several mounds within the Ilisu reservoir area might be as significant as the internationally-renowned site of Catal Hoyuk in Central Turkey. A trench excavated to the base of the eastern mound at Catal Hoyuk, which excavated material

⁵⁰ Algaze, G. (1991) The Tigris-Euphrates Archaeological Reconnaissance Project: Final Report of the Birecik and Carchemish Dam Survey Areas. *Anatolica*, XX, 1994..

⁵¹ The EIAR also mentions an archaeological survey of the reservoir area commenced in 1999 by Dicle and Kirikkale universities. By October 2000, the EIAR states, “all known sites had been revisited” and “new information” was collected. The EIAR gives no details, however, of the extent of this survey and no indication of whether it has covered a whole or part of the reservoir area. (EIAR 7-14.) Later the EIAR claims that this survey has covered “the greatest part of the impacted area.” (EIAR 7-15.) Again, the EIAR gives no details. However, it is clear that many areas have still not been covered due to security factors; “The difficulties encountered are related to the access in various areas. Many sites have been destroyed during the political problems and the Turkish army will have to clear mined areas before all required surveys can be performed.” (EIAR 7-15.)

comprising less than half of one per cent of the cultural deposits of the mound, took a team of 20 professional archaeologists six months to complete and cost over half a million dollars.⁵²

The accelerated time frame for surveys and excavation in the Ilisu project area is unrealistic and contrived. **The constraints of time and money imposed by the dam construction schedule make a mockery of any claims that a full and competent investigation of the cultural heritage of the affected site is being made.**

- **Fundamental work yet to be completed** The EIAR lists suggested complementary studies which should be carried out on the cultural heritage and archaeological impacts of the Ilisu dam. This list makes clear **how much work remains to be done, according to the EIAR itself.** It includes:

Cultural heritage surveys (EIAR 7-8.)

1. Interviews in every village and hamlet to be affected, to determine the history of the village, village names, families, sacred and important areas, crafts, dialects etc.
2. An inventory of man-made caves along the Tigris and excavations of their remains.
3. Consultation with villagers about their graveyards and plans for their relocation.

However, the EIAR fails to detail either time-scale, budget or human resources for these cultural heritage surveys. Accordingly, the above merely becomes a ‘wish-list’ which cannot be taken seriously.

Archaeological surveys (EIAR 7-9.)

1. Aerial surveys of the entire 37, 750 ha reservoir area.
2. Field surveys of this area; “All cultural remains should be collected and properly registered.”
3. Soundings and test-pits at all sites where archaeological artefacts are found.
4. Location of sites to be excavated position with GPS and other technical means.

Archaeological excavations (EIAR 7-10.)

The EIAR is **unable to estimate how many excavations should be made** to do justice to the cultural heritage of the reservoir area – for the simple reason that the area has not yet been surveyed. “It is not possible to establish precisely the number of sites that will be excavated and the time needed for this process but it is clear that the construction period will not allow salvaging all the archaeological wealth of the area.” (EIAR 7-10.)

However, the EIAR allows itself to make a completely unsubstantiated guess at the number of sites that could be excavated in order to assess the human resources needed. (EIAR 7-10.) The EIAR estimates 5-10 sites per year to be excavated for six

⁵² Hodder, I. (1999) ‘Getting to the bottom of things: Catalhoyuk 1999’, in *Anatolian Archaeology: Research Reports of the British Institute of Archaeology at Ankara*, Volume 5, pp. 4-7. Cited in Kitchen (2001).

years. At an absolute maximum such a scheme would excavate 60 sites before flooding. (EIAR 7-10.) Compare this to the over 200 archaeological sites already identified by Algaze's study, which covered only 18.5% of the reservoir area. To call such a plan – which anyway is neither budgeted for nor agreed by the Turkish authorities – inadequate is to make a severe understatement.

To date, according to the EIAR, only nine sites in the entire area to be flooded by Ilisu have been excavated. (EIAR 7-15.) The EIAR identifies a problem in the way excavations have been carried out so far, “each team has its own schedule, its own professional interests and its own way of performing archaeological work.” (EIAR 7-16.) This has led to a circumstance whereby, “one site chosen for excavations lies outside the impacted area.” (EIAR 7-16.)

In respect of the above studies on cultural heritage, archaeological surveys and excavations, the Executive Summary of the EIAR could be misleading in seeming to suggest that plans to study and excavate the reservoir area are in place. The Summary states, “A research program has been devised to survey the entire impacted area in order to record all the archaeological sites and to excavate a large number of them before impounding.” In fact, the EIAR merely *recommends* that such a study be carried out, and in effect details a ‘wish-list’ of how many people would work on this, for how long and with unspecified funding. (EIAR 7-9.) **In reality, this programme does not exist.** This is made clear in Section 4.3.2.2 of the EIAR (EIAR 4-78), when the authors state, “An archaeological research program should be initiated as soon as possible so that there is enough time to foresee and carry out proper conservation measures.” It goes on to detail how much remains to be done, “This program should include inventories updating and completing the historic documentation, an extensive archaeological survey of all areas impacted and excavations of archaeological sites.”

The programme that *does* exist, headed by the Centre for Research and Assessment of Historic Environment (TACDAM), is in no way equivalent to the EIAR's recommended study. For example, the Salvage Project covers both the Ilisu and Carchemish reservoirs, and as previously noted, since funding must be shared between these two dams, Ilisu has so far been denied sufficient resources (see The Ilisu Dam and Hasankeyf above). This Salvage Project is scheduled to continue only for another five years until 2006 (EIAR 7-12), where the EIAR recommends at least another eight years.⁵³ No long-term budget has been committed for the Project as it must be re-negotiated each year. (EIAR 7-13.) The EIAR points to problems caused by this yearly re-negotiation, “Renewing the [budget] allocation on a year to year basis may impede long-term research programs. Each co-ordinator should be assured of adequate financing for 3 year terms at least.” (EIAR 7-16.)

4.3 Why international best practice on cultural heritage cannot be met

Not only does the EIAR fail to present evidence that the international best practice on cultural heritage has been met, the EIAR provides no assurance that the condition **could be met under present circumstances.**

⁵³ The EIAR notes this problem and states “The overall schedule considered (1999-2006) must be extended till the end of the impoundment process for fieldwork and afterwards for report production. (EIAR 7-16.) Even this time-frame must, however, be regarded as grossly insufficient.

1. **Suppression on Kurdish cultural rights.** As noted in Section 3.2 (1), under present circumstances of State of Emergency Rule and active suppression of Kurdish cultural and other human rights, meaningful consultation with affected communities cannot take place. It is evident that there is currently no political will on the part of the State authorities to recognise the cultural rights of affected communities with regard to the Ilisu dam. Without such consultation, the cultural heritage impacts of the Ilisu dam cannot be clearly understood or appreciated.
2. **Military control of cultural heritage.** As noted in Section 3.2 (2), under Turkish law, the military has ultimate responsibility for cultural heritage assessment and protection in the Ilisu region. This situation is inimical to adequate consultation with affected communities. In addition, as the EIAR notes, the ongoing security situation in the region effectively limits cultural heritage work. Many areas of the Ilisu reservoir area have still not been accessed by the archaeological salvage teams due to security factors; “The difficulties encountered are related to the access in various areas. Many sites have been destroyed during the political problems and the Turkish army will have to clear mined areas before all required surveys can be performed.” (EIAR 7-15.)
3. **Past practice in Turkey with respect to cultural heritage.** The EIAR acknowledges the importance, in respect to resettlement practice in Turkey, of looking at past experience to give some indication of what might be expected at Ilisu.⁵⁴ Similarly, past experience in Turkey of dealing with the cultural heritage impacts of dams should also be taken into consideration, especially the most recent experience at the Birecik dam on the Euphrates.

Such a consideration, which the EIAR fails to undertake, reveals disturbing shortcomings, of key relevance for the cultural heritage impacts of Ilisu. This calls into question whether under present circumstances best practice with regard to Ilisu can be achieved.

In a recent review of cultural heritage and dam projects in Turkey, Professor Mehmet Ozdogan of the University of Istanbul states, “When all the dams are finished, an area comparable to 1/6 of all Belgium will be inundated by reservoirs. Nevertheless, in spite of this extensive construction activity, only about 25 of the 298 dam projects have been surveyed at all for Cultural Heritage, and, of these, only 5 have had organized systematic rescue work conducted.”⁵⁵

Equally worrying are the findings of a fact-finding mission to the Ilisu region in October 2000.⁵⁶ The mission visited the Birecik dam, recently completed on the Euphrates River. Its findings are cited below:

⁵⁴ EIAR, 4-85, “The main goal of an EIAR is to assess the impacts of a project. In regard to resettlement, it should be focused on a description of resettlement policies or procedures, on the impacts triggered by resettlement in similar contexts in the past (which constitute the best indicator of what could happen in the future)...”

⁵⁵ Ozdogan, M. (2000) ‘Cultural Heritage and Dam Projects in Turkey: and overview,’ in *Dams and Cultural Heritage Management: a working paper submitted to the WCD*, (eds SA Brandt and F Hassan). Cited in Kitchen (2001).

⁵⁶ KHRP et al (2001) ‘If the River Were a Pen... The Ilisu Dam, the World Commission on Dams and Export Credit Reform,’ KHRP, London, March 2001, p 72.

The Mission first made a visit to the Birecik dam at the Belkis/Zeugma site. There were no archaeologists on site to consult. The excavations at Zeugma are documented as being sophisticated but wholly inadequate. The speed with which the Birecik dam has been constructed and filled has conclusively deprived civilisation of the opportunity to document and map the enormous quantity of significant remains now lying at the bottom of the reservoir. At the very least, what is known to have been destroyed is a Roman Legionary Fortress, a Roman bath and an early Bronze Age cemetery. In addition, countless mosaics and frescoes at Roman villas at Zeugma have been lost. What has also been lost is the cultural and natural wealth of the ancient settlement of Apema and that at the mounds of Tilobur, Tilbes, Tilmusa and Horum

*The Mission had the opportunity to speak to a number of resettled communities who were deeply aggrieved that they had been forcibly parted from their homes and associated heritage and that they were no longer able to worship in their traditional places or to tend the graves of their families. **In summary, the work which had to be done so hastily at Birecik to preserve a tiny fraction of the cultural heritage of the region is devastatingly inadequate in almost every particular.***