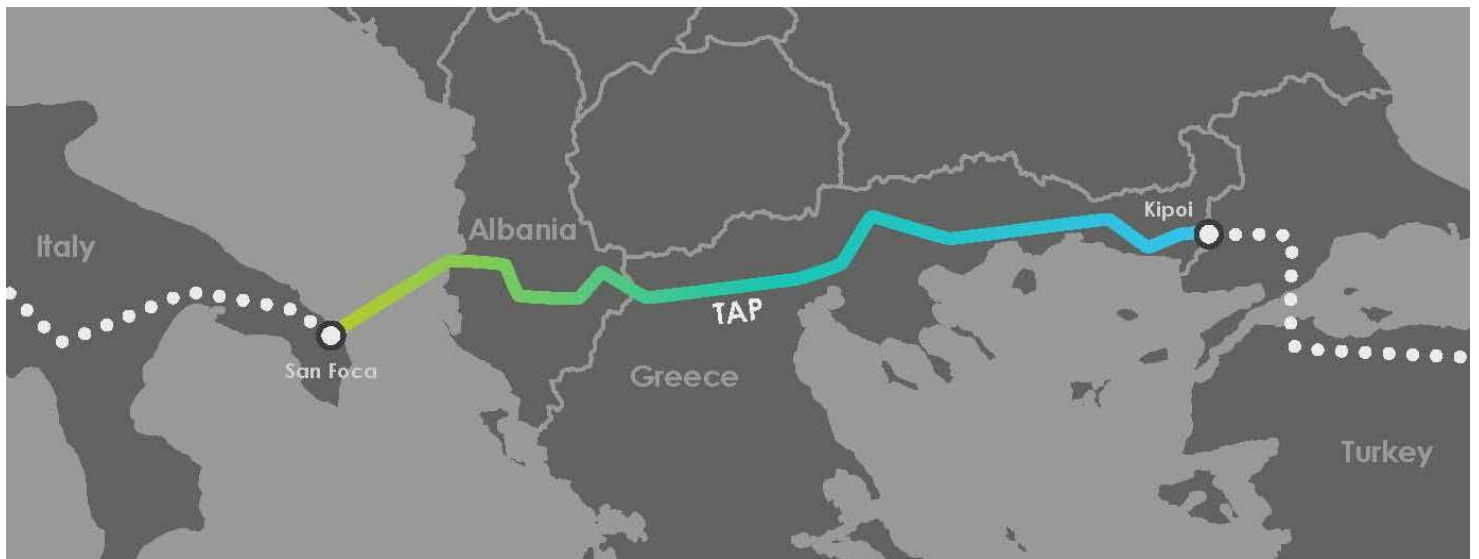




Trans Adriatic
Pipeline



Albania Cultural Heritage Management Plan



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Glossary of Terms

Archaeological Contractor	The Archaeological Contractor is the organisation contracted to be responsible for a variety of cultural heritage responsibilities. The Archaeological Contractor is contracted by the COMPANY
Battery Limit Point Albania	The location of the first dry weld of the pipeline in Albania (i.e. the dry weld closest to the sea)
COMPANY	Trans Adriatic Pipeline AG
CONTRACTOR	Engineering, Procurement and Construction (EPC) contractors and their sub-contractors
Chance Find	Potential cultural heritage (or paleontological) objects, features, or sites that are identified outside of or after a formal site reconnaissance, normally as a result of construction management
Coastal areas	Areas located between the Battery Limit Point Albania and Mean High Water Springs (MHWS)
Cultural heritage impact	A change to cultural heritage (in this context “cultural heritage” refers to any tangible (e.g. objects, artefacts, structures, spaces) or intangible element which is of value or importance to people’s culture, history and/or identity) which has occurred as a result of Project activities. Impacts may be considered to be positive or negative.
Environmental impact	A change to the environment (in this context the “environment” refers to any aspect of the natural or semi-natural physical environment (air, water, soil etc.)) resulting from Project activities. Impacts may be considered to be positive or negative.
Intangible Cultural Heritage	The practices, representations, expressions, knowledge, skills – as well as the instruments, objects, artefacts and cultural spaces associated therewith – that communities, groups and, in some cases, individuals recognize as part of their cultural heritage’ (2003 Convention for the Safeguarding of the Intangible Cultural Heritage). In terms of the Project, it is the associated instruments, objects, artefacts and cultural space that may be affected.
Marine areas	Areas located between Mean High Water Springs (MHWS) and the Albania-Italy median line
Median Line	An agreed marine territorial boundary separating the Exclusive Economic Zone(s) (EEZ(s)) of 2 or more countries
Mean High Water Spring	The mean average of the highest levels that spring tides reach over two successive high waters during those periods of 24 hours when the range of the tide is at its greatest, taken over a period of time (generally approximately 19 years). MHWS is considered the point on this project that delineates between marine and coastal areas, which are both considered in the offshore CCPs

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Offshore areas Areas located between the Battery Limit Point Albania and the Albania-Italy median line. Inclusive of both coastal and marine areas.

Project Proposed pipeline scheme to bring natural gas from the Caspian region to western and South-Eastern Europe (TAP)

Socio-economic impact A change to the existing socio-economic environment (in this context the “socio-economic environment” refers to the combination of any existing social and economic factors) which has occurred as a result of Project activities. Social factors may include aspects such as demographics, health and wellbeing etc. and may refer to individuals, groups or wider communities of people. Economic factors may include aspects such as employment, finances, livelihoods etc. An impact may be considered to be positive or negative.


Defining “onshore”, “offshore”, “coastal” and “marine” areas

The CHMP applies specifically to cultural heritage work of both onshore and offshore areas that might be affected by the Project in Albania and is part of the ESCH Management system for the project.

“Onshore” areas are defined as all areas located between [onshore] KP 0 and the Battery Limit Point Albania (i.e. the location of the first dry weld). For further information on the Battery Limit Point location see the TAP Battery Limits Onshore – Offshore Sections document (CPL00-ENT-100-F-DFO-0002).


“Offshore” areas include both “coastal” and “marine” areas, which are defined as follows:

- “Coastal” areas are defined as all areas located between the Battery Limit Point Albania and the Mean High Water Springs (MHWS).
- “Marine” areas are defined as all areas located between MHWS and the Albania-Italy median line. “Offshore” areas include both the marine and coastal areas, and therefore include all areas located between the Battery Limit Point Albania and the Albania-Italy median line.

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List of Acronyms and Abbreviations

ALARP	As Low As Reasonably Practicable
AoI	construction corridor's Area of Influence (Marine)
ASA	Archaeological Service Agency (ASHA)
CCP	Contractor Control Plans
CH	Cultural Heritage sites, features or assets
CHA	Cultural Heritage Advisor (COMPANY)
CHC	Cultural Heritage Coordinator (COMPANY CHM)
CHE	Cultural Heritage Expert (COMPANY)
CHM	Cultural Heritage Monitor (CONTRACTOR)
CHMP	Cultural Heritage Management Plan
CLO	Community Liaison Officer
EAA	European Archaeological Association
EBRD	European Bank for Reconstruction and Development
EBRD PR	European Bank for Reconstruction and Development Performance Requirements
EEZ	Exclusive Economic Zone (offshore area extending a maximum of 200 nautical miles beyond territorial waters)
ESIA	Environmental and Social Impact Assessment
ESIP	Environment and Social Implementation Plan
ESMD	Environmental and Social Management Document
ESMS	Environmental and Social Management System
FOC	Fibre optic cable
HRIA	Human Rights Impact assessment
IfA	Institute for Archaeologists, a UK organisation
KP	Kilometre Points relating to the pipeline route as per the base case described in the ESIA, (it is possible that the location will change because of a re-routing)
KP [onshore]	Kilometre points relating to the onshore pipeline route in Albania as per the base case described in the ESIA. "Onshore" includes both onshore and coastal locations. Marine locations for the pipeline route in Albania are included under a different set of KPs. (it is possible that the location will change because of a re-routing)

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MoC Ministry of Culture

TAP Trans Adriatic Pipeline

TAP AG Trans Adriatic Pipeline joint venture company

UXO Munitions/unexploded ordinance

WSI Written Scheme of Investigation

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1 Introduction

The CHMP identifies the commitments made in the ESIA Albania in relation to the management of onshore and offshore cultural heritage during the construction and commissioning phase of the Project in Albania and describes the COMPANY's responsibilities and actions in terms of meeting these commitments. The CHMP is a part of the ESCH Management System - the family of management documents developed by the Company to outline the measures to be used for addressing various issues relating to environmental, health and safety, social and cultural heritage.

Where a specific commitment from the Commitments Register Albania is described in this document it is followed by its reference number as stated on the Project Commitment Register Albania (e.g. AL0012). Additional requirements have been included within this CHMP where they are deemed to be internationally accepted or best practice. These additional requirements are not followed by a reference number.

The Environmental and Social Management Plan (CAL00-PMT-601-Y-TTM-0006)) provides an explanation of how this CHMP is to be used in conjunction with other related Project documents.

1.1 Objectives

This CHMP has been prepared to define the avoidance, minimisation, and mitigation measures necessary to ensure that negative impacts to onshore and offshore cultural heritage as a result of Project activities are prevented or, where this is not possible, reduced to as low as reasonably practicable (ALARP¹) during the construction phase of the onshore and offshore sections of the TAP pipeline in Albania.


The objectives of this CHMP are to ensure that onshore and offshore cultural heritage management related work complies with the applicable national and international legislation, best international practice and all relevant EBRD and IFC Performance Requirements, commitments made in the ESIA Albania, COMPANY policies in order to avoid all potential damages to cultural resources (AL0450).

1.2 Scope

This CHMP defines COMPANY plans and procedures relating to onshore and offshore cultural heritage that the COMPANY shall implement wherever feasible during construction, including hydrotesting and commissioning.

The scope of this CHMP includes:

¹ For a risk (or impact) to be ALARP it must be possible to demonstrate that the cost involved in reducing the risk/impact further would be grossly disproportionate to the benefit gained. The ALARP principle arises from the fact that infinite time, effort and money could be spent on the attempt of reducing a risk/impact to zero. It should not be understood as simply a quantitative measure of benefit against detriment. It is more a best common practice of judgement of the balance of risk and societal benefit.

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- measures for impact avoidance, minimisation, and mitigation (including pre-construction studies, construction monitoring, chance finds procedures and the protection of both known and unknown onshore and offshore cultural heritage sites)
- a project archaeological overview
- organisational set-up for management of cultural resources.

The scope of this CHMP focuses on three general categories of cultural heritage: archaeological sites, monuments, and sites with intangible cultural heritage (ICH) value.

Monitoring and inspection requirements related to this plan are detailed in Company E&S Compliance Assurance Plan (CAL00-PMT-601-Y-TTM-0005).

This CHMP applies to all onshore and offshore areas that might be affected by the Project construction phase. Onshore areas include (but are not limited to) the working strip, construction sites of the compressor stations, construction sites of the block valve stations, access roads/dirt tracks, all temporary material and waste storage areas, camps and pipe yards.


Offshore areas that might be affected by the Project construction phase include both coastal and marine areas. For a further definition of what is defined as an “offshore”, “marine” or “coastal” area and their respective limits see Glossary of Terms to this document.

Marine areas include, but are not limited to the landfall, the pipeline trench and its immediately surrounding area, the area required for laying of the fibre optic cable (FOC) and Albania territorial water and Exclusive Economic Zone (EEZ) (in terms of the potential extent of any marine impact resulting from Project offshore construction activities). Coastal areas include but are not limited to the landfall, the working strip, roads (including access roads, dirt tracks and public roads), aggregate extraction sites, spoil disposal sites, batch plants, all temporary material and waste storage areas, camps, pipe yards and maintenance areas.

The COMPANY should note that where marine-related activities occur on land (e.g. offshore pipe storage yards and vehicular transport of supplies/personnel), the requirements specified in the coastal and onshore impact avoidance and mitigation sections of this CHMP will apply.

1.3 Responsibilities

The COMPANY’s primary responsibility in relation to cultural heritage is the implementation of the requirements of this ESMD through compliance assurance and monitoring of the Contractors and other participants in implementation of this CHMP. The details of the compliance assurance requirements are described in the E&S Compliance Assurance Plan (CAL00-PMT-601-Y-TTM-0005). CONTRACTOR’s requirements are described in the Onshore and Offshore Cultural Heritage CCPs (AAL00-PMT-601-Y-TTM-0001 and AAL00-RSK-601-Y-TTM-0030). As part of the COMPANY Cultural Heritage Management Plan (CHMP), all the actions identified in Appendix 1 will be examined and agreed with the National authorities. Any changes to the details described in Appendix 1 that are identified as part of the discussions with the National authorities will be provided to CONTRACTOR.

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The COMPANY shall be responsible for ensuring that for all activities, all site operations, equipment and machinery shall comply with:


- applicable national and international legislation
- international lender standards and policies
- specific requirements within the ESIA Albania and HRIA Albania
- commitments listed in the Commitments Register Albania
- requirements of this document.

The above is applicable both to activities under the COMPANY's direct control (i.e. activities performed solely by the COMPANY) and its indirect control (i.e. activities performed by CONTRACTOR on behalf of the COMPANY). Ensuring compliance for activities under the indirect control of the COMPANY will be achieved through compliance monitoring.

The COMPANY shall be responsible for any adverse environmental, socio-economic and cultural heritage impacts arising from project activities and operations under its direct and indirect control and for putting in place any necessary measures to avoid, minimise, or if avoidance is not possible, mitigate them. The COMPANY will also be responsible for promptly reacting to accidental events arising from its activities and minimising and/or mitigating any resulting adverse environmental, socio-economic and cultural heritage impacts as much as possible.

The COMPANY shall put these responsibilities into effect by:

- requiring that CONTRACTOR writes Onshore and Offshore Cultural Heritage ESIPs that describe how it will implement the requirements described in the Onshore and Offshore Cultural Heritage CCPs (AAL00-PMT-601-Y-TTM-0001, AAL00-RSK-601-Y-TTM-0030), and reviewing these ESIPs before accepting
- communicating the contents of this CHMP to COMPANY workers and training them to ensure that they understand their responsibilities with respect to onshore and offshore cultural heritage management and incident reporting and response
- ensuring that adequate resources are mobilised for onshore and offshore cultural heritage management, including input from any specialist resources necessary to ensure effective planning and timely implementation of measures
- ensuring compliance by COMPANY workers (excluding CONTRACTOR workers, see below) with the procedures established in this CHMP
- ensuring compliance by CONTRACTOR workers with the procedures established in the Onshore and Offshore Cultural Heritage ESIPs (through compliance monitoring)
- implementing effective monitoring of onshore and offshore cultural heritage management measures to ensure that the effectiveness of cultural heritage management activities is assessed and any issues are promptly detected, in accordance with the Compliance Assurance Plan (CAL00-PMT-601-Y-TTM-0005)

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- ensuring that all environmental, socio-economic and cultural heritage incidents are reported and dealt with effectively and that lessons are learned in accordance with the Environmental and Social Management Plan (CAL00-PMT-601-Y-TTM-0006)
- ensure all CONTRACTOR construction ground clearance and ground breaking work will be monitored under the fulltime supervision of CONTRACTOR Cultural Heritage Monitors (CHM).

In addition to the above requirements, the COMPANY shall employ a Cultural Heritage Advisor (CHA), who's responsibilities shall include but not be limited to:

- promoting compliance with the Cultural Heritage Management Plan
- managing other cultural heritage experts (CHE) appointed by the COMPANY, if required
- ensuring that all required licences for archaeological work have been obtained from the appropriate government bodies
- the administration of various contracts, designing of the mitigation programme and coordinating of Project and external interests
- in conjunction with CHE, coordinating, scheduling and developing the scope of work and supervising the Archaeological Contractor
- supporting the Project to provide appropriate, documented reports and/or permits that allow the Project to proceed
- in conjunction with CHE, verifying the cultural heritage significance of any potential Chance Finds (ascription is to be negotiated by the Company and ASHA) and recommending appropriate actions
- carrying out cultural heritage training with the CHE.

The Archaeological Contractor is the organisation contracted by the CONTRACTOR to be responsible for:


- undertaking archaeological excavations
- undertaking monitoring of earthmoving and other construction activities, using a CHM employed by the CONTRACTOR
- recording, studying and reporting the materials discovered during pre-construction and construction phases and providing reports of the same, at a frequency agreed with the COMPANY
- reporting Chance Finds as they are made in accordance with the Project Chance Finds Procedure
- making recommendations via the CHA and CHE to the COMPANY, CONTRACTOR and Authorities
- providing instruction to other Project field personnel in recognising and acting on cultural heritage issues

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- maintaining current records of daily monitoring activities and any special reports prepared.

The Archaeological Contractor will be a licensed company approved for work in Albania by the Albanian government Ministry of Culture (MoC) and the Archaeological Service Agency (ASA)².

² The MoC is the government organisation that oversees all cultural heritage activities and is responsible for cultural heritage protection and curation. The ASA is a body responsible to MoC for approval of work and issuing excavation licenses. This agency will have the primary role in monitoring cultural heritage works.

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2 Onshore impact avoidance and mitigation

2.1 Pre-construction studies and design adjustments

It is the responsibility of the COMPANY to undertake the majority of pre-construction studies. The COMPANY shall undertake a detailed survey in advance of construction of all the locations identified in the ESIA. The survey will consist of the identification and further assessment of the sites (listed in Table A1-1, Appendix 1) to ensure that an appropriate response and mitigation can be applied. A complete detailed list of actions to be undertaken at each site will be agreed with MoC and ASA. As part of this process the COMPANY shall record the condition and structural integrity of any identified sites with above-ground components located in proximity (50m) to the Project footprint prior to construction (AL0447). This is of particular importance in areas where damage due to pollution or vibration is considered likely. The COMPANY will communicate the locations in an GIS format with the results of the surveys and any action that is required to the CONTRACTOR, who shall ensure that it is aware of these locations and the pre-construction condition of the features.


A list updated from the current known commitments detailing the locations and extents and condition surveys will be issued to CONTRACTOR ahead of construction. COMPANY will communicate where CONTRACTOR shall implement preventative mitigation measures (such as fencing, signage, dust control, or ensuring public access to specific areas).

Any new reroutes or additional land requirements will require new pre-construction surveys in accordance with the defined standards of the ESIA and will be undertaken by the CONTRACTOR.

Cultural heritage resources must be considered and included in the design phase of any Project-related undertaking with the potential to impact sites. All reasonable efforts must be taken to avoid known cultural heritage resources during the design and construction phases of the Project (AL0449, AL0456, and AL0464). This will include, where possible, undertaking measures to adjust the siting of the construction corridor in order to avoid physical damage to designated Nature Monuments (AL0142), standing stones (AL0449), monuments and archaeological sites (AL0464) and sites with ICH value (AL0456). For ICH sites, the Project will, where feasible, avoid them through Project design to ensure limited impacts on their settings and landscapes (AL0456).

Avoidance is the preferred mitigation technique method and will be considered along with the identified mitigation measures listed under Chapter 8.20.3 of 'ESIA Albania Section 8 – Assessment of Impacts and Mitigation Measures' (AL0449, AL0456, AL0464). All re-routing of the construction corridor by CONTRACTOR shall require approval by the COMPANY.

Where it is not possible to avoid monuments or sites with ICH value (i.e. those located in the 28m wide reduced working strip for pipeline construction), relocation, replacement and compensation will be considered by the COMPANY and discussed as options with relevant stakeholders (AL0463), (see also the Stakeholder Engagement Strategy (TAP-HSE-ST-0009)).

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2.2 Construction archaeological monitoring

The Construction Monitoring Programme will require all construction work to be carried out under the full-time supervision of a CHM. The CHM will document and report on construction monitoring activities regularly as agreed with MoC. These reports will be subject to CHA, CHE, and MoC review and approval.

Any observed impacts to cultural heritage will be reported by the CHM to the COMPANY Cultural Heritage Coordinator (CHC) and responsible government authority, which may stop work until inspection and mitigation measures are established. This requirement is applicable to impacts to cultural heritage in all areas potentially affected by the Project.


2.3 Chance Finds Procedure

Chance Finds are defined as potential cultural heritage (or paleontological) objects, features, or sites that are identified outside of or after a formal site reconnaissance, normally as a result of construction management. Chance Finds can be made by any member of the Project including archaeologists, non-cultural heritage site workers and visitors.

2.3.1 Compliance framework

A Chance Finds Procedure is required by Albanian law, EU legislation and the EBRD and IFC PRs, in addition to the Project Commitment Register Albania. The Chance Finds Procedure for TAP in Albania will be implemented prior to construction starting. The Chance Finds Procedure objective is to identify and protect previously unrecorded cultural heritage sites, objects or features from Project-related damage. The Procedure applies to potential cultural heritage objects, features or sites identified as a result of construction activities on an area. The procedure includes monitoring of all ground breaking construction activities by a professional archaeologist (a CHM appointed by the CONTRACTOR and approved by COMPANY and MoC) and the cessation of work (through the implementation of a stop work protocol) in the vicinity of any new archaeological discovery. If a Chance Find is discovered during construction, rescue procedures should be conducted as outlined by international and Albanian national standards if no other mitigation to remove, avoid or protect can be applied. Construction activities at Chance Find locations will resume only after the implementation of government-approved mitigation measures (AL0458) such as rescue, removal, avoidance or protection. Continuation of construction after a Chance Find rescue should only resume once the rescue excavation is complete.

Individual artefacts are important as indicators of the presence of nearby surface or subsurface cultural heritage sites. The principal value of most cultural heritage artefacts is only realised, however, when the objects are part of an interpretable cultural heritage site. This procedure concerns itself with the protection of cultural heritage sites themselves rather than individual artefacts, as individual artefacts can be easily removed. The significance of an artefact is to be negotiated by the Company and ASHA.

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The decision on whether a Chance Find is a cultural heritage resource requiring additional treatment will be made by a CHM in consultation with the CHE and CHC based on professional experience and training. Any member of the COMPANY and CONTRACTOR workforce has the responsibility to notify the CHM or CHE or CHC immediately in case of a suspected Chance Find.

2.3.2 Chance Finds Procedure


The COMPANY, CONTRACTOR and its subcontractors shall put in place the following Chance Finds Procedure and apply it in where any movable or immovable objects, sites, structures or groups of structures having archaeological, paleontological, historical, architectural, religious, aesthetic or other cultural significance are encountered. The Chance Finds Procedure will be implemented at all construction fronts for all ground clearance and ground breaking activities (AL0458).

The most difficult step is to ensure that all Chance Finds trigger the correct application of this process, as untrained workers are often not able to differentiate between normal environmental features (stones, etc.) and for example paleontological finds. To aid this, the CHA and CHE will carry out training to sensitise the work force and be available at all times to verify whether a finding is of significance from a cultural heritage perspective. To reduce the time to obtain feedback the CHM and CHC will be based on site for all works close to known cultural heritage sites or areas with high archaeological potential. In addition, such construction activities will be supervised by the CHM (AL0458). For more information refer to the E&S Compliance Assurance Plan (CAL00-PMT-601-Y-TTM-0005) which describes COMPANY monitoring and assurance activities. The CONTRACTOR is responsible for ensuring safe access for the CHA, CHE, CHC, archaeological contractors and the Ministry of Culture personnel to working areas at all times.

Any Chance Finds identified or observed impacts to cultural heritage will be reported by the CHM to CONTRACTOR Supervisor for the area of works, the CHE and/or CHA, and responsible government authority, which may stop work until inspection and mitigation measures are established. This requirement is applicable to impacts to cultural heritage in all areas potentially affected by the Project.

The CHM shall identify and verify the finding, assess its significance (with ascription of significance to be negotiated by the Company and ASHA) and in consultation with CONTRACTOR Supervisor, CHC and CHE shall decide to either suspend work on the site and/or larger areas around it, or to remove the finding (if it is an easily movable object such as a coin etc.) and allow the work to continue. In the case of a Chance Find that is a site or which can't be removed, work in the vicinity (at a minimum all areas 50m from the discovery) must cease and the area shall be marked for avoidance by CONTRACTOR (or any subcontractors) (AL0458).

Site treatment scenarios to be considered include preservation in place through rerouting or specialized construction techniques, and rescue excavations in advance of additional construction work, if avoidance is not possible. If archaeological rescue is required for a Chance Find, the COMPANY is responsible for ensuring that the rescue is conducted according to international and Albanian standards and with oversight and involvement of the appropriate government institutions (AL0557, AL0459).

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Construction activities at a Chance Find will resume only once rescue excavation and the implementation of government-approved mitigation measures and/or treatment work is complete (AL0556, AL0459). A detailed description of the Chance Finds Procedure is provided below.

Should a Chance Find be discovered by either the CHM or the CONTRACTOR's workers, the following activities will take place:

- Cessation of work in the vicinity by CONTRACTOR workforce including any subcontractors through the implementation of a stop work protocol (AL0765) by CONTRACTOR Supervisor in consultation with CHM.
- Marking of the area with high visibility red plastic fencing by CONTRACTOR for avoidance at a minimum all areas 50m from the chance find discover (AL0461)
- Notification of CONTRACTOR supervisor for the area of works and COMPANY representative who will inform the CHE. CHE will in turn notify CHA and with the CHM will notify the government cultural heritage representative in ASHA.
- Identification and evaluation of the initial significance of the finding in terms of cultural heritage by CHM working with the Company and ASHA. Based on this evaluation, the CHE and CHA will jointly in consultation decide if construction activities in the vicinity need to be suspended or can be resumed. Construction activities will be allowed to be continued if the finding can be easily removed, e.g. a coin.
- Depending on whether avoidance is possible or not, two scenarios will be considered by COMPANY and the decision conveyed to CONTRACTOR:
 - If avoidance is possible, the finding should be preserved in place through rerouting or specialized construction techniques.
 - If avoidance is not possible, COMPANY will be responsible for implementing an archaeological rescue according to international and Albanian standards and with oversight and involvement of the appropriate government institutions (AL0459).


When the work is complete the construction activities will be able to continue.

2.3.3 Chance Finds reporting

Should a Chance Find be discovered either by the CHM or by the CONTRACTOR workers, a Chance Find Report, to be submitted to the CHA, will be prepared in collaboration by CHM and CHE within 48 hours of the discovery of the finding in accordance with MoC and ASA requirements.

This report must contain the following information:

- date and time of the discovery
- location of the discovery (GPS coordinates and [onshore] KP reference)
- description of the discovery
- significance of discovery – ascription of significance is to be negotiated by the Company and ASHA
- estimated weight and dimensions i.e. feasibility to move the discovery

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- estimated time needed to conduct excavation of discovery
- recommendation of how to proceed
- temporary protection measures implemented.

The relevant authority, ASA, will be consulted when determining the appropriate action to be taken with respect to the Chance Find. Such actions may include, but not be limited to:

- removal, if feasible, of artefacts
- protection *in situ*
- execution of further excavation within a specified distance of the discovery point of sites
- decision to continue with the construction work.

2.3.4 Chance Finds documentation

COMPANY Cultural Heritage staff, COMPANY non-Cultural Heritage staff and CONTRACTOR will be required to maintain records of monitoring, Chance Finds, and Chance Find response measures executed. These will for the CONTRACTOR include:


- daily monitoring records indicating areas and activities monitored; reported Chance Finds and the results of any evaluations. Communications and instructions (such as stop work and resume work) will also be included
- weekly reports summarizing reporting period activities including Chance Finds, assessments and evaluations, internal and external communications and instructions and supporting photographic documentation (or other reference materials as appropriate). An additional report aimed at fulfilling any specific CHA, CHE, and MOC requirements is also anticipated.
- monthly reports summarizing monitoring and evaluation results, status of any site treatment measures required, instructions to CONTRACTOR, and other internal and external communications.

2.3.5 Finds requiring notification to the Civil Authorities

It is not uncommon for evidence of various human activities to be uncovered during earthmoving. In the majority of cases, these can be seen to have a convincing historic or earlier origin and represent no threat or interest to the well-being of the contemporary society. However, there are several types of discoveries that are of concern and need to be reported to the Civil Authorities. These can include:

- human burials
- munitions or unexploded ordnance (UXO)
- animal disease burial pits.

The last two items have their own response procedures within the Health and Safety requirements, but it is quite possible that representatives of the cultural heritage team may make the initial discovery, and need to be aware of the correct procedures on discovery. Part of their training will

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include the first actions to be taken in the event of such discoveries. For further information, refer to Section 5.5.2 of the ESMP (CAL00-PMT-601-Y-TTM-0006).

Human remains are a different case, in that historic human burials can be mistaken for recent, unmarked burial sites. In such instances, the appropriate action is to leave the site undisturbed and protected and report to the Civil Authorities for their investigation. Where the cultural heritage team is convinced of the ancient origin of such remains, it is a legal requirement to report such discoveries and the professional assessment of their age to the local authority.

2.4 Protection of known cultural heritage sites

2.4.1 General protection measures

Known cultural heritage sites must be protected from Project-related damage. This includes sites identified in advance of construction activities and those found during construction (Chance Finds). Sites may be located on the Project areas or adjacent to them.

Site information will be provided by the CHA and CHE to the COMPANY and CONTRACTOR personnel in written and verbal form in official transmittals, meetings, and tool box talks as appropriate, to ensure that known cultural heritage sites are protected as per the defined commitments for cultural heritage.

For archaeological sites, the COMPANY will engage the appropriate Albanian authorities in further evaluation of sites and the use of intrusive and non-intrusive methods (AL0462).


2.4.2 Protection from vibration

Structural damage from vibration can exacerbate the already diminished structural integrity of ancient or historic buildings. If any structural assessment that is required by the authorities to be undertaken by the COMPANY indicates that a site is at risk of impacts from vibration, CONTRACTOR shall ensure that appropriate measures are taken to avoid, or where this is not possible, minimise any possible damage that may occur due to Project-related activities (see Appendix 1).

In the cases where a part or all of a cultural heritage site is damaged due to excessive vibration, building conservators will be called in immediately by the CONTRACTOR to repair the structure with conventional conservation techniques (AL0440) after approval by the COMPANY. Upon completion, the COMPANY shall determine whether reparations are sufficient, and if not may request further reparation measures to be provided by CONTRACTOR. The condition and structural integrity of the above-ground features will be monitored periodically during construction by CONTRACTOR for signs of degradation caused by vibration.

2.4.3 Protection from dust and other forms of stone pollution

Some forms of pollution can be damaging to stone architecture. If a structural assessment undertaken at the request of the authorities indicates a risk of impacts from pollution, CONTRACTOR with support from CHM shall cover or otherwise protect the site from potential impacts (AL0448) using appropriate material. If dust from earthworks is the issue the COMPANY with the CONTRACTOR shall ensure that appropriate measures are taken to avoid, or where this is not possible, minimise any possible damage that may occur due to Project-related activities.

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In any cases where a site of cultural value is damaged due to Project-related pollution, the site will be cleaned by professional conservators (arranged by CONTRACTOR) and protected from further damage (AL0448). Upon completion, the COMPANY shall determine whether the cleaning is sufficient, and if not may request further measures to be provided by CONTRACTOR. The condition and structural integrity of the above-ground features will be monitored periodically during construction by CONTRACTOR for signs of degradation caused by pollution (most commonly in the form of dust and soot).

2.4.4 Protection from negative aesthetic impacts


The Project will be designed to mitigate negative aesthetic and auditory impacts of facilities. The following aesthetic techniques will be considered by the COMPANY for implementation by CONTRACTOR (AL0451):

- noise-reducing barriers
- low-profile constructions
- siting and location to maximize the use of topography and vegetation
- screening
- blending with topographic forms and existing vegetation patterns
- use of environmental coloration or advanced camouflage techniques to limit visual effects.

2.4.5 Community use of cultural heritage sites

Requirements relating to community use of cultural heritage sites are primarily the responsibility of CONTRACTOR. For more information see the Onshore Cultural Heritage CCP (AAL00-PMT-601-Y-TTM-0001). Prior to construction, CONTRACTOR shall undergo consultation with site users by the CONTRACTOR's community liaison officer (CLO) to understand site usage and how the Project may affect user access (AL0441). Consultation with site users shall occur through the CLO to understand site use, site boundaries, and timing of religious and cultural activities that could interfere with construction, operation or decommissioning activities (AL0454, AL0455). For further information on stakeholder engagement procedures see the Stakeholder Engagement Strategy (TAP-HSE-ST-0009) and the Onshore Stakeholder Engagement and Corporate Social Responsibility CCP (TAP-ASM-PR-0001).

In the case that access to an important cultural heritage site is restricted or blocked, CONTRACTOR will arrange alternative access using stakeholder input and notify the public of the blockage and alternate means of access (AL0439). Disruption of user access, particularly to important monuments and sites with ICH value, is likely to cause community issues, and so, where feasible, CONTRACTOR shall ensure that Project equipment and activities are be planned and placed to avoid restricting site access (AL0443).

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3 Offshore impact avoidance and mitigation

3.1 Pre-construction studies and design adjustment

3.1.1 Coastal pre-construction studies and design adjustment

In accordance with its responsibilities, the COMPANY has undertaken pre-construction studies in advance of construction, with the purpose of recording any previously unidentified cultural heritage of significance along the coastal pipeline route (Marine Archaeological Survey Report AAL00-ERM-641-Y-TAE-1022). The studies did not identify any cultural heritage sites.

This information will be communicated to CONTRACTOR prior to commencement of construction and after it has been submitted to the appropriate Albanian authorities. All re-routing of the construction corridor by CONTRACTOR shall require approval by the COMPANY and will require additional pre-construction surveys.

Avoidance is the preferred mitigation technique method and this has been considered along with the identified mitigation measures listed under Chapter 8.20.3 of 'ESIA Albania Section 8 – Assessment of Impacts and Mitigation Measures' (AL0449, AL0456, AL0464). This has included, where possible, measures to adjust the siting of the construction corridor in order to avoid physical damage to designated Nature Monuments (AL0142) (i.e. the Semani Old Sand Dunes)).

3.1.2 Marine pre-construction studies and design adjustment


In accordance with its responsibilities, the COMPANY has undertaken pre-construction studies in advance of construction using bathymetric, remote sensing and visual imaging surveys (Marine Archaeological Survey Report AAL00-ERM-641-Y-TAE-1022). The surveys did not identify any marine archaeological sites that will definitely be impacted by construction activities, although several sites were identified that are close to the construction corridor's Area of Influence (AoI).

The information from this survey will be communicated to CONTRACTOR prior to commencement of construction and been submitted to the appropriate Albanian authorities. All re-routing of the construction corridor by CONTRACTOR shall require approval by the COMPANY and will require additional pre-construction surveys.

Marine cultural heritage avoidance through avoidance will have the same requirements as described in Section 3.1.1, but be applicable to marine areas.

3.1.3 Construction archaeological monitoring

Offshore construction archaeological monitoring will have the same requirements as described in Section 2.2, but be applicable to marine areas.

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3.2 Chance Finds procedure

3.2.1 Coastal Chance Finds procedure

The Chance Finds procedure will have the same requirements as described in Section 2.3, but will be applicable to coastal areas.

3.2.2 Marine Chance Finds procedure

The Chance Finds procedure for marine areas will be predominantly the same as for onshore and coastal areas (see Sections 2.3 and 3.2.1), but with the additional requirement that a professional COMPANY archaeologist (ideally the CHM) will be present on board vessels during dredging and pipeline trench work in order to monitor construction activities and handle (with the advice and input of the CHA and CHE) any archaeological rescues, if required.

3.3 Protection of known cultural heritage sites

3.3.1 Coastal general protection measures of known cultural heritage sites

Coastal general protection measures will have the same requirements as described in Section 2.4.1, but be applicable to coastal areas.


3.3.2 Marine general protection measures for known cultural heritage sites

In addition to the general protection measures as described in Section 2.4.1, the COMPANY will allow for exclusion zones around the location of features such as known wrecks identified in the pre-construction survey of the AoI. Consultation with National authorities will dictate the proposed scale of the exclusion zones, linked to the type of record, relative reliability of the wreck data, and the nature of the marine heritage asset.

The anchor management plan should include marking the precise location of each target and the establishment of a 200m buffer around all targets identified in the pre-construction survey. In instances where it is not feasible to assure a 200m buffer around a particular target, COMPANY or the CONTRACTOR should complete ROV video monitoring around the target to ensure no interference and no damage to the cultural heritage site.

Any exclusion zones may need to be adjusted in the light of additional information that may come about through additional consultation, or the results of any survey data. New marine heritage assets could also come to light during planning and construction works, which would require avoidance and additional exclusion zones.

Flexibility is required, if marine heritage assets are encountered during construction. A specified tolerance for micro-siting to allow for changes to be made to the precise location of infrastructure during construction will be requested, so that account can be taken of the discovery of any unforeseen marine heritage assets.

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3.3.3 Coastal protection from negative aesthetic impacts

The Project will be designed to mitigate negative aesthetic and auditory impacts of facilities. If required, the following aesthetic techniques will be considered by the COMPANY for implementation by CONTRACTOR (AL0451):

- noise-reducing barriers
- low-profile constructions
- screening
- use of environmental coloration or advanced camouflage techniques to limit visual effects.

3.4 Community use of cultural heritage sites

Requirements relating to community use of cultural heritage sites are primarily the responsibility of CONTRACTOR. For more information see the Offshore Cultural Heritage CCPs (AAL00-RSK-601-Y-TTM-0030).

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4 Archaeological Contractor – Project overview, scope and guidance

The following is specific guidance on the level of work to be undertaken by the Archaeological Contractor; which will be contracted by the CONTRACTOR. Specifications or written schemes of investigation (WSI) shall be prepared for each site to be investigated outlining the objectives of the work and resources to be used and will be approved by ASA and the National Archaeological Council who will issue licences for the work.

4.1 Onshore Archaeological Contractor Project overview, scope and guidance

The management of Project cultural heritage features follow a phased approach to the progressive identification of sites and impacts during the design and construction of the Project. The five phases are as discussed below.

4.1.1 Phase 1: Review existing data


Areas of potential archaeological interest are identified by various desk-based activities such as scientific literature review, documentary searches for previous archaeological work and examination of aerial and satellite images. The route of the pipeline and facilities is examined on the ground in a rapid walkover survey to verify the route facilities and proposed access road locations.

4.1.2 Phase 2: Extensive and intensive surveys

The route of the pipeline and facilities is examined on the ground to assist in the determination of potential impact and to define the parameters of the further investigation. Areas of potential impact lying within the pipeline construction corridor (38m) or which may be impacted by permanent or temporary facilities (such as access roads and construction camps) are examined to determine their nature and significance (ascription of significance is to be negotiated by the Company and ASHA). This can be by various means including detailed survey, geophysical survey and trial trenching. The information is used to assist in the detailed design of the pipeline route and facilities and where possible, the route can be changed (AL0029) or its impact reduced to minimise the damage to cultural heritage features. Sites requiring work in this phase are identified in Table A1-1 of the Appendix 1. For each site the type of information required is outlined. This is classed as either 'further assessment', or 'identify site location'. 'Further assessment' is used where more information on the direct impact on the site is required. 'Identify site location' applies to all sites with above ground elements and is used where the physical position of a site is not known or the condition should be recorded to allow for physical protection of a site.

Table A1-1 shows the sites where action is required as identified in the ESIA Albania. This represents all the sites found close to the project footprint area, including:

- 53 sites classed as requiring 'Further Assessment'
- 19 sites classed as requiring 'Identify Site Location'

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- a further 198 sites identified in the course of Project surveys. These are found on earlier route alignments that are not currently being used.

4.1.3 Phase 3: Pre-construction excavations

In areas where damage to the resource is unavoidable, archaeological deposits shall be recorded by a planned excavation prior to construction activities. Phase 3 work will be carried out at those sites identified in Phase 2 as containing significant remains within the Project working strip. Phase 3 investigations will involve archaeological data recovery, in which a sample of the cultural values are recovered from the sites in the form of data and artefacts. Phase 3 investigation of a site will result in a scientific report accompanied by artefacts prepared for museum curation. Phase 3 work therefore mitigates impacts to such archaeological sites. An alternative mitigation measure is site avoidance by rerouting of the pipeline route, or re-design of facilities (AL0029). Mitigation by avoidance, however, could require investigations outside of the working strip to determine site boundaries, since Phase 2 work focuses on those site areas that lie within the construction area.

4.1.4 Phase 4: Chance Finds during construction

It is recognised that construction of a pipeline and associated permanent and temporary facilities may reveal previously unknown archaeological features. Arrangements are made for the monitoring of construction and provision of a team of archaeologists to conduct 'rescue/salvage excavations' where required. This is also known as the 'Chance Finds Procedure' (see Section 2.3.2). The discovery of Chance Finds can lead to rescue excavations to mitigate Project impacts.

4.1.5 Phase 5: Reporting

The study of material and preparation of reports on the archaeological works will be carried out during the Project. This phase will include the dissemination of the results of the work both to the archaeological audience and to the wider public via an appropriate medium.

Standards of work will comply with EBRD PR08, IFC PS08, Albanian national and international standards e.g. UK Chartered Institute for Archaeologists. Additional guidance for this work at an international level can be found European Archaeological Association (EAA) codes.

4.2 Offshore Archaeological Contractor Project overview, scope and guidance


4.2.1 Phase 1: Review existing data

Phase 1 follows the same procedures as described in Section 4.1.1, but applicable to offshore areas.

4.2.2 Phase 2: Extensive and intensive surveys

4.2.2.1 Coastal Areas

The route of the pipeline is examined on site to assist in the determination of potential impact and to define the parameters of the further investigation. Any areas of potential impact lying within the pipeline construction corridor (38m) are examined to determine their nature and significance. This can be by various means including detailed survey, geophysical survey and trial trenching. The information is used to assist in the detailed design of the pipeline route and facilities and where

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possible, the route can be changed (AL0029) or its impact reduced to minimise the damage any cultural heritage features.

For the coastal areas, no particular sites have been identified in the ESIA Albania as requiring work in this phase. It shall therefore be the responsibility of the COMPANY to determine where, and the extent to which, Phase 2 activities will be undertaken along the coastal route of the pipeline.

4.2.2.2 Marine Areas

No dedicated surveys for marine cultural heritage are envisaged, however as previously discussed in Section 3.1.2, pre-pipelay surveys will be undertaken, and any findings of cultural heritage significance will be recorded (ascription is to be negotiated by the Company and ASHA).

4.2.3 Phase 3: Pre-construction excavations


Phase 3 follows the same procedures as described in Section 4.1.3, but applicable to those sites identified in Phase 2 as containing significant remains within the coastal working strip.

4.2.4 Phase 4: Chance Finds during construction

It is recognised that construction of a pipeline and associated permanent and temporary facilities may reveal previously unknown archaeological features. Arrangements are made for the monitoring of construction and provision of a team of archaeologists to conduct 'rescue/salvage excavations' where required. This is also known as the 'Chance Finds Procedure' (see Section 3.2).

4.2.5 Phase 5: Reporting

Phase 5 follows the same procedures as described in Section 4.1.5, but applicable to offshore areas.

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5 Monitoring and Inspection

The COMPANY monitoring and inspection requirements relating to onshore and offshore cultural heritage can be found in the E&S Compliance Assurance Plan (CAL00-PMT-601-Y-TTM-0005).


6 Training

The COMPANY shall include guidelines in the Code of Conduct (TAP-GEN-PO-0001), by which all COMPANY and CONTRACTOR personnel are required to abide to prohibit employee activities that might interfere with nearby cultural heritage sites

7 Related Documents

The following is a list of documents which, amongst others, have content relevant to this CHMP.

- Environmental and Social Management Plan (CAL00-PMT-601-Y-TTM-0006)
- Onshore Cultural Heritage CCP (AAL00-PMT-601-Y-TTM-0014)
- Offshore Cultural Heritage CCP (AAL00-RSK-601-Y-TTM-0030)
- E&S Compliance Assurance Plan (CAL00-PMT-601-Y-TTM-0005)
- Stakeholder Engagement Strategy (TAP-HSE-ST-0009)
- Code of Conduct (TAP-GEN-PO-0001)
- TAP Battery Limits Onshore - Offshore Sections (CPL00-ENT-100-F-DFO-0002)
- Marine Archaeological Survey Report (AAL00-ERM-641-Y-TAE-1022).

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APPENDIX 1 CULTURAL HERITAGE COMMITMENTS FROM THE PROJECT ESIA

The following tables (A1-1 and A1-2) provide information on the known cultural heritage receptors outlined in the Albania ESIA and applicable commitments with further detail pertaining to each commitment.


Table A1-1 details specific known cultural heritage receptors, and the ESIA commitments applicable to these, as well as COMPANY and CONTRACTOR responsibilities. A list of all the cultural heritage commitments with brief explanation and where on the pipeline route that these commitments apply are provided in Table A1-2.

Table A-1 Site-specific cultural heritage commitments*


[onshore] KP	Site	Description	Commitment	Pre-Construction (COM- PANY)	Construction Actions (CONTRACTOR)
0.6	CH-310	Pottery scatter	AL0483	Further Assessment	To be advised
0.6	CH-311	Pottery scatter	AL0483	Further Assessment	To be advised
0.8	CH-313	Pottery scatter	AL0484	Further Assessment	To be advised
3.1	CH-315	Pottery scatter	AL0495	Further Assessment	To be advised
3.2	CH-316	Pottery scatter	AL0492	Further Assessment	To be advised
4.1	CH-319	Pottery scatter	AL0484	Further Assessment	To be advised
4.3	CH-505	Pottery scatter	AL0484	Further Assessment	To be advised
6.1	CH-323	Pottery scatter	AL0492	Further Assessment	To be advised
29.8	CH-336	Pottery scatter	AL0492	Further Assessment	To be advised
29.9	CH-337	Pottery scatter	AL0492	Further Assessment	To be advised
32.6	CH-338	Fragment of tile	AL0492	Further Assessment	To be advised
34.9	CH-339	Point on the National Road near Vashtemia Prehistoric site	AL0484	Identify site location	Protect from Damage
36	CH-506	Pipeline crosses the National Road near "Dream House"	AL0487	Identify site location	Protect from Damage

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[onshore] KP	Site	Description	Commitment	Pre-Construction (COMPANY)	Construction Actions (CONTRACTOR)
37.3	CH-340	Fragment of a vessel	AL0482	Further Assessment	To be advised
40.6	CH-343	Pottery scatter	AL0492	Further Assessment	To be advised
43.2	CH-344	Pottery scatter	AL0492	Further Assessment	To be advised
43.5	CH-345	Bronze artefact	AL0486	Further Assessment	To be advised
44.3	CH-346	Sherds worked by water activity	AL0482	Further Assessment	To be advised
49.9	CH-351	Open-air archaeological site	AI0494	Further Assessment	To be advised
50	CH-350	Pottery scatter	AI0494	Further Assessment	To be advised
57.9	CH-357	Pottery scatter	AL0492	Further Assessment	To be advised
58.4	CH-358	Pottery scatter	AL0486	Further Assessment	To be advised
59	CH-359	Stone structure	AL0492	Further Assessment	To be advised
59.2	CH-361	Artefact scatter	AL0497	Further Assessment	To be advised
62.8	CH-362	The Church of St. Mehill	AL0472, AL0474, AL0489	Identify site location	Protect from Damage
62.8	CH-363	The Grave of Baptism	AL0466, AL0472, AL0480	Identify site location	Protect from Damage
62.8	CH-419	St Michael's cemetery	AL0472, AL0480	Identify site location	Protect from Damage
68.2	CH-22	Area with potential for archaeological features	AL0487	Further Assessment	To be advised
75	CH-520	Ceramic water pipe fragment	AL0487	Further Assessment	To be advised
75	CH-523	Pottery scatter	AL0485	Further Assessment	To be advised
75.5	CH-521	Grave marked by gravestone monuments	AL0468, AL0471, AL0473	Identify site location	Protect from Damage
75.5	CH-522	WWII Memorial	AL0468, AL0471, AL0496	Identify site location	Protect from Damage
75.5	CH-523	Ceramic scatter	AL0485	Further Assessment	To be advised
83.8	CH-528	Helmes Village Cemetery	AL0470, AL0472, AL0476	Identify site location	Protect from Damage
85.1	CH-530	Stone building ruin	AL0490, AL0493	Identify site location	Protect from Damage
85.2	CH-529	Stone bridge pier	AL0490, AL0495	Identify site location	Protect from Damage
91.6	CH-116	Area with potential for archaeological features	AL0487	Further Assessment	To be advised
91.8	CH-406	Identified Archaeological Site	AL0484	Further Assessment	To be advised
109.1	CH-364	Modern cemetery	AL0467, AL0481	Identify site location	Protect from Damage
109.8	CH-365	Pottery scatter	AL0484	Further Assessment	To be advised

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[onshore] KP	Site	Description	Commitment	Pre-Construction (COMPANY)	Construction Actions (CONTRACTOR)
113.4	CH-368	WWII Memorial	AL0472, AL0475, AL0480	Identify site location	Protect from Damage
116.9	CH-369	WWII Memorial	AL0472, AL0475, AL0498	Identify site location	Protect from Damage
122.9	CH-375	Pottery scatter	AL0484	Further Assessment	To be advised
124.1	CH-373	Concentration of stones (probably a tumulus cemetery)	AL0495	Further Assessment	To be advised
124.8	CH-374	Farm house and terracing walls of Roman and post-Ottoman periods	AL0477, AL0497	Further Assessment	To be advised
127.9	CH-378	Graves	AL0495	Identify site location	Protect from Damage
133.7	CH-382	Tiles	AL0486	Further Assessment	To be advised
139.1	CH-135	Vodicë S Bregu Xhakës Bridge	AL0475, AL0488	Identify site location	Protect from Damage
139.1	CH-182	Modern church at Vodice	AL0472, AL0475, AL0480	Identify site location	Protect from Damage
140.2	CH-136	Archaeological finds north of Bregu i Xakes	AL0484	Further Assessment	To be advised
140.2	CH-181	Pottery scatter	AL0484	Further Assessment	To be advised
142.4	CH-137	Area with potential for archaeological features	AL0479	Further Assessment	To be advised
144.3	CH-386	Pottery scatter	AL0497	Further Assessment	To be advised
144.3	CH-387	Pottery scatter	AL0486	Further Assessment	To be advised
145.2	CH-388	Pottery scatter	AL0486	Further Assessment	To be advised
145.5	CH-389	Lithic artefact	AL0495	Further Assessment	To be advised
145.7	CH-390	Tiles	AL0486	Further Assessment	To be advised
146	CH-532	Ceramic scatter	AL0491	Further Assessment	To be advised
147.9	CH-141	Place of pilgrimage at Lisi Becit (no longer in use because of damage)	AL0472, AL0475, AL0480	Identify site location	Protect from Damage
148.3	CH-531	Ceramic scatter	AL0495	Further Assessment	To be advised
148.5	CH-391	Pottery scatter	AL0486	Further Assessment	To be advised
150.1	CH-146	Pottery scatter	AL0484	Further Assessment	To be advised
156.9	CH-393	Pottery scatter	AL0492	Further Assessment	To be advised
165.1	CH-395	Concentration of artefacts	AL0497	Further Assessment	To be advised
166.9	CH-397	Potential archaeological site	AL0495	Further Assessment	To be advised

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[onshore] KP	Site	Description	Commitment	Pre-Construction (COM-PANY)	Construction Actions (CONTRACTOR)
176.1	CH-402	Fragments of tiles	AL0492	Further Assessment	To be advised
176.4	CH-403	Pottery scatter	AL0492	Further Assessment	To be advised
187.3	CH-154	Zharrez Roman road station	AL0484	Further Assessment	To be advised
189.1	CH-158	Mbrostar Roman site	AL0479	Further Assessment	To be advised
199.1	CH-412	WWII Memorial	AL0469	Identify site location	Protect from Damage
202.6	CH-413	Old church and graveyard	AL0475	Identify site location	Protect from Damage
Duress area	CH-535	Pottery scatter	AL0494	Further Assessment	To be advised

* The full list and text of the commitments is shown in Table A1-2.



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Table A-2 Explanation of cultural heritage commitments.

‘Location’ indicates whether the commitment can apply throughout the Project at any number of locations ‘General’, or are specific to particular places along the route of the pipeline. In these instances the [onshore] KP location is shown (this can then be compared against the site specific table A1-1).


Number	Location	Action Required
AL0028	General	Implementation of archaeological monitoring and a “chance finds” procedure.
AL0029	General	Cultural Heritage findings. Re-routing if resources are found on the offshore survey.
AL0142	General	Where possible, measures will be undertaken to adjust the siting of the construction corridor in order to avoid physical damage to designated Nature Monuments.
AL0439	General	In the case that access to an important cultural heritage site is restricted or blocked, the Project will arrange alternative access using stakeholder input and notify the public of the blockage and alternate means of access.
AL0440	General	In the case that a part or all of a cultural heritage site is damaged due to excessive vibration, building conservators will be called in immediately to repair the structure with conventional conservation techniques.
AL0441	General	Consultation with site users through a community liaison team to understand site usage and how the Project may affect user access.
AL0442	General	Vibrations to subsurface features are more severe in wet conditions. In very wet conditions, the Project will prohibit construction in the vicinity of structures identified as at risk of vibration impacts. These conditions would occur following episodes of very heavy rain, most likely during the rainy season.
AL0443	General	Disruption of user access, particularly to important monuments and sites with ICH value, is likely to cause community issues. Where feasible, Project equipment and activities will be planned and placed to avoid restricting site access. Avoidance is the preferred mitigation method and will be considered along with the mitigation measures listed under Chapter 8.20.3 of the 'ESIA Albania Section 8 - Assessment of Impacts and Mitigation Measures'.
AL0444	General	The most severe vibrations associated with road traffic result from heavy vehicles with stiff suspensions moving rapidly along roads with irregular surfaces. Vibration-minimising techniques will be implemented near structures identified as at risk of impacts from vibration. Vibration-minimising techniques for road traffic include: restriction of vehicle velocity, minimisation of

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		surface irregularities (potholes, manhole covers, washboards, cobblestones) by road improvements or re-surfacing, increase in stiffness of the road surface and its sub-base, and installation of isolation pads over limited sections of a road.
AL0445	General	Structural damage from vibration can exacerbate the already diminished structural integrity of ancient or historic buildings. If structural assessment indicates that a site is at risk of impacts from vibration, the site will be structurally reinforced or otherwise stabilised and protected from such impacts (i.e. structural bracing, use of dampening strips or tuned dampers to reduce the propagation of vibration through historic buildings, or cement reinforcement).
AL0446	General	The Project will use low impact construction alternatives, when feasible. Ripping may be used as an alternative to blasting near structures identified as at risk of impacts from vibration. Other techniques, such as bored piling or the use of a hammer cushion when driving steel piles may be used to minimise the vibration generated. Low-impact demolition methods, such as the use of hydraulic rock splitters rather than rock breakers, will also be applied where possible.
AL0447	General	The condition and structural integrity of sites with above-ground components located in proximity to the Project footprint will be recorded prior to construction.
AL0448	General	Some forms of pollution can be damaging to stone architecture. If structural assessment indicates a risk of impacts from pollution, a site will be covered or otherwise protected from potential impacts. If dust from earthworks is the issue, dust-minimising strategies, such as water spraying, may be used around the at-risk site. In the case that a site of cultural value is damaged due to Project-related pollution, the site will be cleaned by professional conservators and protected from further damage.
AL0449	General	Avoidance of standing structures through Project design, such as historic buildings, monuments, and archaeological sites with above-ground features. Avoidance is the preferred mitigation method and will be considered along with the mitigation measures listed under Chapter 8.20.3 of 'ESIA Albania Section 8 - Assessment of Impacts and Mitigation Measures.
AL0450	General	The Cultural Heritage Management and Monitoring Plan will have the objective of avoiding potential damages to cultural resources. The plan will be developed following TAP AG policies and will consider all the relevant EBRD PRS.
AL0451	General	Project will be designed to mitigate negative aesthetic and auditory impacts of facilities. The following aesthetic techniques will be considered: noise-reducing barriers, low-profile constructions, proper sighting and location to maximise the use of topography and vegetation, screening, blending with topographic forms and existing vegetation patterns, and use of environmental coloration or advanced camouflage techniques to limit visual effects.

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Number	Location	Action Required
AL0452	General	Restrict the timing of construction, maintenance, and demolition activities so as not to disturb the use of cultural heritage sites. Stop work at certain times when sites are in use, such as during significant events (such as weddings or religious festivals). For example, blasting outside of a church would be prohibited during worship services.
AL0453	General	Noise and vibration will be periodically monitored at cultural heritage sites that receive visitors within the area of influence.
AL0454	General	Consultation with site users through a community liaison team to understand site use, site boundaries, and timing of religious and cultural activities that could interfere with construction, operation or decommissioning activities.
AL0455	General	Consultation with site users through a community liaison team to understand site use, site boundaries, and timing of religious and cultural activities that could interfere with construction, operation or decommissioning activities.
AL0456	General	Where feasible, the Project will avoid cultural heritage sites through Project design to ensure limited impacts on the setting and landscape of these sites. Avoidance is the preferred mitigation method and will be considered along with the mitigation measures listed under chapter 8.20.3 of 'ESIA Albania Section 8 - Assessment of Impacts and Mitigation Measures'.
AL0457	General	Inclusion of guidelines in the workers' Code of Conduct to prohibit employee activities that might interfere with nearby cultural heritage sites.
AL0458	General	Chance finds procedures will be implemented at construction fronts. This includes the monitoring of construction activities by a professional archaeologist and the cessation of work in the vicinity of any new archaeological discovery. Construction activities at an important chance find will resume only after the implementation of government-approved mitigation measures.
AL0459	General	If archaeological rescue is required at a chance find, the rescue will be conducted according to international and Albanian standards and with oversight and involvement of the appropriate government institutions.
AL0460	General	In areas of high archaeological potential inside the working width, construction will be prohibited in very wet conditions.
AL0461	General	Sites that lie within 50m of Project construction footprint will be conspicuously marked and protected with temporary barriers such as a bright coloured plastic or mesh wire fence with highly visible flagging or tape attached to it. Areas of high archaeological potential will be marked for avoidance, particularly during wet conditions.
AL0462	General	For archaeological sites, the Project will engage the appropriate Albanian authorities in further evaluation of sites and the use of intrusive and non-intrusive methods.

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Number	Location	Action Required
AL0463	General	Where it is not possible to avoid monuments or sites with ICH value (i.e. those located in the 28m-wide reduced working width), relocation, replacement and compensation will be considered and discussed as options with relevant stakeholders.
AL0464	General	Avoidance of known cultural heritage sites through Project design, if technically feasible. Avoidance is the preferred mitigation method and will be considered along with the mitigation measures listed under chapter 8.20.3 of 'ESIA Albania Section 8 - Assessment of Impacts and Mitigation Measures'.
AL0465	General	<ul style="list-style-type: none"> • Avoidance • Evaluation • Consultation • Maintenance timing restrictions • Guidance in Code of Conduct
AL0466	[onshore] KP 62.8	<ul style="list-style-type: none"> • Avoidance • Evaluation • Marking and protection • Community consultation • Noise and vibration monitoring (for sites with regular visitors) • Guidance in Code of Conduct • Construction restrictions or stop work
AL0467	[onshore] KP 109.1	<ul style="list-style-type: none"> • Avoidance • Evaluation • Marking and protection • Community consultation • Noise and vibration monitoring (for sites with regular visitors) • Guidance in Code of Conduct • Construction restrictions or stop work
AL0468	[onshore] KP 75.5	<ul style="list-style-type: none"> • Avoidance • Evaluation • Marking and protection • Community consultation • Noise and vibration monitoring (for sites with regular visitors) • Guidance in Code of Conduct • Construction restrictions or stop work

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Number	Location	Action Required
AL0469	[onshore] KP 199.1	<ul style="list-style-type: none"> • Avoidance • Evaluation • Marking and protection • Community consultation • Noise and vibration monitoring (for sites with regular visitors) • Guidance in Code of Conduct • Construction restrictions or stop work
AL0470	[onshore] KP 83.8	<ul style="list-style-type: none"> • Avoidance • Evaluation • Community consultation • Planning to avoid user access restrictions • Alternate access • Public notification
AL0471	[onshore] KP 75.5	<ul style="list-style-type: none"> • Avoidance • Evaluation • Community consultation • Planning to avoid user access restrictions • Alternate access • Public notification
AL0472	[onshore] KP 62.8, 83.8, 113.4, 116.9, 139.1, 147.9	<ul style="list-style-type: none"> • Avoidance • Evaluation • Community consultation • Planning to avoid user access restrictions • Alternate access • Public notification
AL0473	[onshore] KP 75.5	<ul style="list-style-type: none"> • Evaluation • Avoidance • Record of structure conditions and monitoring • Protection/bracing • Cultural Heritage Management Plan

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Number	Location	Action Required
		<ul style="list-style-type: none"> • Community consultation • Low-impact construction techniques • Vibration-minimising techniques • Stop construction in wet conditions • Conservation • Relocation/compensation
AL0474	[onshore] KP 62.8	<ul style="list-style-type: none"> • Evaluation • Avoidance • Record of structure conditions and monitoring • Protection/bracing • Cultural Heritage Management Plan • Community consultation • Low-impact construction techniques • Vibration-minimising techniques • Stop construction in wet conditions • Conservation • Relocation/compensation
AL0475	[onshore] KP 113.4, 116.9, 139.1, 147.9, 202.6	<ul style="list-style-type: none"> • Evaluation • Avoidance • Record of structure conditions and monitoring • Protection/bracing • Cultural Heritage Management Plan • Community consultation • Low-impact construction techniques • Vibration-minimising techniques • Stop construction in wet conditions • Conservation • Relocation/compensation
AL0476	[onshore] KP 83.8	<ul style="list-style-type: none"> • Evaluation • Avoidance • Record of structure conditions and monitoring • Protection/bracing • Cultural Heritage Management Plan

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Number	Location	Action Required
		<ul style="list-style-type: none"> • Community consultation • Low-impact construction techniques • Vibration-minimising techniques • Stop construction in wet conditions • Conservation • Relocation/compensation
AL0477	[onshore] KP 124.8	<ul style="list-style-type: none"> • Evaluation • Avoidance • Record of structure conditions and monitoring • Protection/bracing • Cultural Heritage Management Plan • Community consultation • Government engagement (CH-374) • Low-impact construction techniques • Vibration-minimising techniques • Stop construction in wet conditions • Conservation • Relocation/compensation
AL0478	General	<ul style="list-style-type: none"> • Further site evaluation • Marking • Cultural Heritage Management Plan (including archaeological monitoring and Chance Finds Procedure) • Prohibit drive-over traffic in wet conditions
AL0479	[onshore] KP 142.4, 189.1	<ul style="list-style-type: none"> • Further site evaluation • Marking • Cultural Heritage Management Plan (including archaeological monitoring and Chance Finds Procedure) • Prohibit drive-over traffic in wet conditions
AL0480	[onshore] KP 62.8, 113.4, 139.1, 147.9	<ul style="list-style-type: none"> • Evaluation • Avoidance • Community consultation • Marking and protection • Narrow road upgrade construction working width (CH-141)

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Number	Location	Action Required
		<ul style="list-style-type: none"> • Guidance in Code of Conduct • Cultural Heritage Management Plan
AL0481	[onshore] KP 109.1	<ul style="list-style-type: none"> • Evaluation • Avoidance • Community consultation • Marking and protection • Reduced working width (CH-364) • Guidance in Code of Conduct • Cultural Heritage Management Plan
AL0482	[onshore] KP 37.3, 44.3	<ul style="list-style-type: none"> • Avoidance • Further site evaluation • Marking and protection • Cultural Heritage Management Plan (including archaeological monitoring and Chance Finds Procedure)
AL0483	[onshore] KP 0.6	<ul style="list-style-type: none"> • Avoidance • Further site evaluation • Marking and protection • Cultural Heritage Management Plan (including archaeological monitoring and Chance Finds Procedure)
AL0484	[onshore] KP 0.8, 4.1, 4.3, 34.9, 91.8, 109.8, 122.9, 140.2, 150.1, 187.3	<ul style="list-style-type: none"> • Avoidance • Further site evaluation • Marking and protection • Narrow the road upgrade construction working width (CH-313) • Cultural Heritage Management Plan (including archaeological monitoring and Chance Finds Procedure) • Guidance in Code of Conduct
AL0485	[onshore] KP 75, 75.5	<ul style="list-style-type: none"> • Avoidance • Further site evaluation • Marking and protection • Cultural Heritage Management Plan (including archaeological monitoring and Chance Finds Procedure) • Guidance in Code of Conduct

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Number	Location	Action Required
AL0486	[onshore] KP 43.5, 58.4, 133.7, 144.3, 145.2, 148.5	<ul style="list-style-type: none"> • Avoidance • Further site evaluation • Marking and protection • Cultural Heritage Management Plan (including archaeological monitoring and Chance Finds Procedure) • Guidance in Code of Conduct
AL0487	[onshore] KP 36, 68.2, 75, 91.6	<ul style="list-style-type: none"> • Avoidance • Further site evaluation • Marking • Cultural Heritage Management Plan (including archaeological monitoring and Chance Finds Procedure) • Prohibit drive-over traffic in wet conditions
AL0488	[onshore] KP 139.1	<ul style="list-style-type: none"> • Avoidance • Further site evaluation • Micro-reroute • Marking and protection • Record of structure conditions and monitoring • Community consultation • Relocation or compensation • Guidance in Code of Conduct • Cultural Heritage Management Plan (including archaeological monitoring and Chance Finds Procedure)
AL0489	[onshore] KP 62.8	<ul style="list-style-type: none"> • Avoidance • Further site evaluation • Protection • Record of structure conditions and monitoring • Community Consultation • Guidance in Code of Conduct • Cultural Heritage Management Plan (including archaeological monitoring and Chance Finds Procedure).
AL0490	[onshore] KP 85.1, 85.2	<ul style="list-style-type: none"> • Avoidance • Archaeological survey of proposed pipe yard and camp locations • Marking and protection • Government engagement • Rescue • Cultural Heritage Management Plan (including archaeological monitoring and Chance Finds Procedure)

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Number	Location	Action Required
AL0491	[onshore] KP 146	<ul style="list-style-type: none"> • Avoidance • Further site evaluation • Marking and protection • Government engagement • Rescue • Cultural Heritage Management Plan (including archaeological monitoring and Chance Finds Procedure).
AL0492	[onshore] KP 3.2, 6.1, 29.8, 29.9, 32.6, 40.6, 43.2, 57.9, 59, 156.7, 176.1, 176.4	<ul style="list-style-type: none"> • Avoidance • Further site evaluation • Micro-reroute (CH-359) • Marking and protection • Reduced working width (CH-402) • Government engagement • Rescue • Cultural Heritage Management Plan (including archaeological monitoring and Chance Finds Procedure)
AL0493	[onshore] KP 85.1	<ul style="list-style-type: none"> • Avoidance • Further site evaluation • Marking and protection • Government engagement • Reduced working width (CH-373 and CH-397) • Guidance in Code of Conduct • Rescue • Cultural Heritage Management Plan (including archaeological monitoring and Chance Finds Procedure)
AL0494	[onshore] KP 49.9, 50, Dures area	<ul style="list-style-type: none"> • Avoidance • Further site evaluation • Marking and protection • Government engagement • Reduced working width (CH-373 & CH-397) • Guidance in Code of Conduct • Rescue • Cultural Heritage Management Plan (including archaeological monitoring and Chance Finds Procedure)

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Number	Location	Action Required
AL0495	[onshore] KP 3.1, 85.2, 124.1, 127.9, 145.5, 148.3, 166.9	<ul style="list-style-type: none"> • Avoidance • Further site evaluation • Marking and protection • Government engagement • Reduced working width (CH-373 & CH-397) • Guidance in Code of Conduct • Rescue • Cultural Heritage Management Plan (including archaeological monitoring and Chance Finds Procedure)
AL0496	[onshore] KP 75.5	<ul style="list-style-type: none"> • Avoidance • Evaluation • Community consultation • Marking and protection • Relocation/compensation • Guidance in Code of Conduct • Record of structure conditions and monitoring • Cultural Heritage Management Plan
AL0497	[onshore] KP 59.2, 124.8, 144.3, 165.1	<ul style="list-style-type: none"> • Avoidance • Further site evaluation • Marking and protection • Government engagement • Micro-reroute (CH-374) • Rescue • Guidance in Code of Conduct • Record of structure conditions and monitoring (for CH-374) • Cultural Heritage Management Plan (including archaeological monitoring and Chance Finds Procedure)
AL0498	[onshore] KP 116.9	<ul style="list-style-type: none"> • Avoidance • Evaluation • Community consultation • Marking and protection • Relocation/Compensation • Guidance in Code of Conduct • Record of structure conditions and monitoring • Cultural Heritage Management Plan

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Number	Location	Action Required
AL0556	General	Continuation of construction at an important Chance Find should only resume once excavation is complete.
AL0557	General	If a Chance Find of high importance is discovered during construction, rescue procedures should be conducted as outlined by International and Albanian national standards.