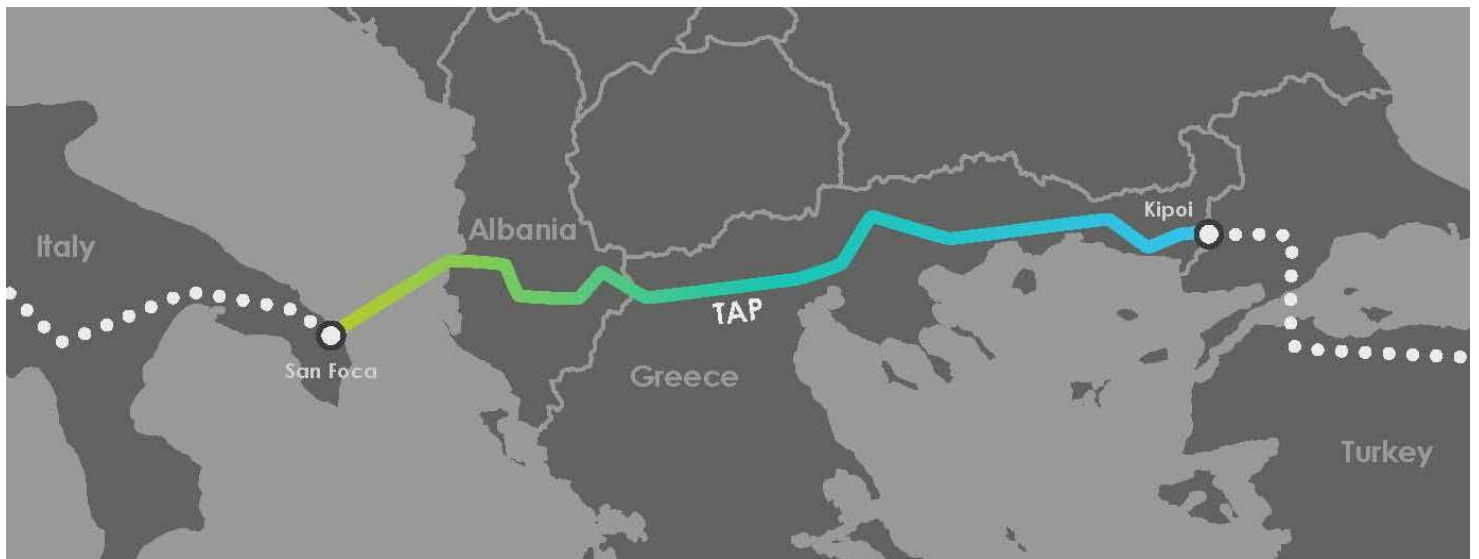




Trans Adriatic
Pipeline



Greece Cultural Heritage Management Plan



 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	2 of 31

TABLE OF CONTENTS

Glossary of Terms.....	4
List of Acronyms and Abbreviations.....	5
1 Introduction	6
1.1 Objectives	6
1.2 Scope.....	6
1.3 Responsibilities	7
2 Impact avoidance, minimisation, and mitigation	10
2.1 Avoidance and Minimisation	10
2.2 Construction archaeological monitoring.....	11
2.3 Chance Finds Procedure.....	11
2.3.1 Compliance framework.....	11
2.3.2 Chance Finds Procedure.....	12
2.3.3 Chance Finds reporting	13
2.3.4 Chance Finds documentation.....	13
2.3.5 Finds requiring notification to the Civil Authorities	14
2.4 Protection of known cultural heritage sites.....	14
2.4.1 Protection from vibration.....	15
2.4.2 Protection from dust and other forms of stone pollution.....	15
2.4.3 Protection from negative aesthetic impacts.....	15
2.4.4 Construction techniques	16
2.5 Community use of cultural heritage sites.....	16
3 Archaeological Work Project overview, scope and guidance	17
3.1 Phase 1: Review existing data	17
3.2 Phase 2: Extensive and intensive surveys	17
3.3 Phase 3: Pre-construction excavations.....	18
3.4 Phase 4: Chance Finds during construction	18
3.5 Phase 5: Reporting.....	18

 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	3 of 31

4 Training 19

5 Monitoring and inspection..... 19


6 Related documents 19

APPENDIX 1..... 20

List of Tables


Table A1-1 Site-Specific Cultural Heritage Commitments. 20

Table A1-2 Explanation of Cultural Heritage Commitments 23

 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	4 of 31


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
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
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.
Ephorate	Regional Service of the Ministry of Culture and Sports with responsibility for prehistoric and classical antiquities, Byzantine antiquities, etc.
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.
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.

 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	5 of 31

List of Acronyms and Abbreviations

ALARP	As Low As Reasonably Practicable
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
HRIA	Human Rights Impact assessment
HGA	Host Government Agreement
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)
MoCS	Ministry of Culture and Sports
MOU	Memorandum of Understanding for Cultural Heritage as part of the Host Government Agreement (HGA) between the Hellenic Republic and the COMPANY (L.4217/2013), in particular Schedules 4 and 5, which are with the MoCS and the Ephorates
TAP	Trans Adriatic Pipeline
TAP AG	Trans Adriatic Pipeline joint venture company
UXO	Munitions/unexploded ordinance
WSI	Written Scheme of Investigation

 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	6 of 31

1 Introduction

This Environmental and Social Management Document (ESMD) identifies the commitments made in relation to the management of onshore cultural heritage during the construction and commissioning phase of the Project in Greece and describes the COMPANY's responsibilities in terms of meeting these commitments. Where a specific commitment from the Greece Commitments Register is described in this document it is followed by its reference number as stated on the Project Commitment Register Greece (e.g. GR0012). Additional requirements have been included within this ESMD 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 ESMD is to be used in conjunction with other related Project documents.

1.1 Objectives

This ESMD has been prepared to define the avoidance, minimisation, and mitigation measures necessary to ensure that negative impacts to known and unknown onshore cultural heritage sites 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 sections of the Project in Greece. The objectives of this ESMD are to ensure that onshore cultural heritage management related work complies with MOUs, as part of the Host Government Agreement (HGA) between the Hellenic Republic and the COMPANY (L.4217/2013), in particular Schedules 4 and 5, relevant EBRD and IFC Performance Requirements/Standards, ESIA Greece commitments, COMPANY policies and best international practice in order to avoid, minimise, or mitigate potential adverse impacts on cultural resources (GR0333, GR0341).


The Host Government Agreement (HGA) between the Hellenic Republic and the COMPANY (L.4217/2013), in particular Schedules 4 and 5 (MOUs), provide the basic legal framework for the Project in relation to Archaeological Authority Permissions.

1.2 Scope

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

The scope of this ESMD 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.

 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	7 of 31

- 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 cultural heritage sites)
- a project archaeological overview
- organisational set-up for management of cultural resources.

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

This ESMD applies to all onshore areas that might be affected by the Project, including but not limited to the working strip, construction sites of the compressor stations, the block valve stations, pipe storage areas, camps, work sites, roads, quarries, borrow pits and spoil (excess material) disposal sites.

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, the Ephorates, and other participants in implementation of Cultural Heritage Management Plan. The details of the compliance assurance requirements are described in the E&S Compliance Assurance Plan (CAL00-PMT-601-Y-TTM-0005). CONTRACTOR' requirements are described in the Onshore Cultural Heritage CCP (GAL00-PMT-601-Y-TTM-0001). As part of this ESMD, all the actions identified in Appendix 1 will be examined and agreed with the National authorities in the form of MOUs. 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 the CONTRACTORS.

The COMPANY shall be responsible for ensuring that for all archaeological excavations, for the securing of permits, all site operations, personnel, equipment and machinery shall comply with:

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

The above is applicable to both activities under the COMPANY's direct control (i.e. activities performed solely by the COMPANY) and its indirect control (i.e. activities performed by the CONTRACTORS 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 activities and operations under its direct control and for putting in place any necessary measures to avoid, minimise, or if not possible mitigate them. The COMPANY will also be responsible for promptly reacting to accidental events arising from its activities and

 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	8 of 31


minimizing and/or mitigating any resulting adverse environmental, socio-economic and cultural heritage impacts as much as possible.

The COMPANY shall:

- require that each CONTRACTOR writes an Onshore Cultural Heritage ESIP that describes how it will implement the requirements described in Section 3 of the Onshore Cultural Heritage CCP (GAL00-PMT-601-Y-TTM-0001), and reviewing the ESIPs before accepting
- communicate the contents of this ESMD to its workers and contractors and train them to ensure that they understand their responsibilities with respect to onshore cultural heritage management and incident reporting and response. This does not apply to CONTRACTOR workers as they will be instructed in their responsibilities with respect to onshore cultural heritage management and incident reporting and response by CONTRACTOR, based on the Onshore Cultural Heritage ESIP
- ensure that adequate resources are mobilised for onshore cultural heritage management, including input from any specialist resources necessary to ensure effective planning and implementation of measures. This includes ensuring that the Contractors have adequate resources to the Onshore Cultural Heritage ESIP
- ensure compliance by its workers (excluding CONTRACTOR workers, see below) with the procedures established in this ESMD
- ensure compliance by CONTRACTOR workers with the procedures established in the Onshore Cultural Heritage ESIP (through compliance monitoring)
- implement effective monitoring of onshore 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 E&S Compliance Assurance Plan (CAL00-PMT-601-Y-TTM-0005)
- ensure that all environmental and 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 full time supervision of a CONTRACTOR Cultural Heritage Monitor (CHM) who will be approved by the competent Ephorates of Antiquities according to the MOU Schedules 4 and 5. The CONTRACTOR will supply the CHM all necessary equipment that, as per the MOU, will be requested by the Competent Ephorate.

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


- promoting compliance with the Cultural Heritage Management Plan and procedures for Project activities
- managing Company Cultural Heritage Experts (CHE), if required

 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	9 of 31

- ensuring that all required approvals for archaeological work have been obtained from the appropriate government bodies
- the administration of various contracts, design of mitigation programme and coordination of Project and external interests
- coordinating, scheduling, developing the scope of work and supervising the archaeological contractor
- supporting the Project to provide appropriate, documented reports and/or permits that allow Project to proceed
- verifying the cultural heritage significance of any Chance Finds
- carrying out cultural heritage training.

The archaeological monitoring, trial trench investigations and rescue excavation work will be the responsibility of the competent Ephorates and will be undertaken with archaeological staff and equipment that will be supplied by the CONTRACTOR in accordance with the Schedule 4 and 5 MOUs. Archaeological workers will be approved for work in Greece by the Ministry of Culture and Sports (MoCS) and Ephorates and are responsible for:

- undertaking archaeological excavations and investigations
- undertaking monitoring of earth moving and other construction activities supervised by the Cultural Heritage Monitor (CHM)
- recording, studying and reporting the materials discovered during pre-construction and construction phases and provide reports of same, at an agreed frequency
- reporting Chance Finds discoveries as they are made in accordance with the project Chance Find Procedure
- making recommendations via the CHA to the COMPANY and CONTRACTOR
- providing instruction to other Project field personnel in recognising and acting on cultural heritage issues
- maintaining current record of daily monitoring activities and any special reports prepared.

 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	10 of 31

2 Impact avoidance, minimisation, and mitigation

2.1 Avoidance and Minimisation

Cultural heritage resources must be considered and included in the design stage of any Project-related undertaking with the potential to impact sites. All reasonable efforts must be taken to avoid or minimise negative impacts to cultural heritage resources through Project design, if technically feasible, during the construction phase of the Project. This will include, where possible, undertaking measures to adjust the siting of the construction corridor to avoid physical damage to monuments, archaeological sites and sites with intangible cultural heritage (ICH) value (GR0341).


Avoidance through additional local re-routings or relocations, is the preferred mitigation/technique method and will be considered along with the mitigation measures listed under chapter 8.17.4 of the ESIA (GR0333, GR0341) and described in Appendix 1. 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, relocation, replacement and compensation will be considered by the COMPANY and discussed as options with relevant stakeholders (GR0334). Any discussion with Stakeholders will be conducted in accordance with the Stakeholder Engagement Strategy (TAP-HSE-ST-0009)). In cases where the avoidance of linear cultural heritage resources is not possible, special crossing methods may be implemented. The selected crossing method will be determined by CONTRACTOR after further site evaluation and in agreement with the COMPANY and the National authorities (GR0359).

The COMPANY shall undertake a detailed survey of all the locations identified in the ESIA that will consist of identification and further assessment of the sites (listed in Table A1-1, Appendix 1). A complete detailed list of actions to be undertaken at each site will be agreed with the MCT and the competent Ephorates. As part of this process the COMPANY will record the condition and structural integrity of sites with above-ground components located in proximity (50m) to the Project footprint prior to construction (GR0356). This is of particular importance in areas where damage due to pollution or vibration is considered likely. The COMPANY will issue a list of sites detailing locations and pre-construction condition of the features to CONTRACTOR prior to the commencement of construction activities.

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

Pre-construction avoidance efforts conducted by the COMPANY will include aerial image analysis along the base case route to identify potential areas of interest for further investigation. Where available, historic maps will be compared to the results of the aerial image analysis. The COMPANY will also engage local landowners in areas of interest to ascertain whether results of analyses indicate potential subsurface ancient structures or more recent land use patterns, in accordance with the Stakeholder Engagement Strategy (TAP-HSE-ST-0009). Relevant GIS layers will be

 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	11 of 31

produced to allow for an integrated assessment of visual analysis and historic data. The findings of these pre-construction studies may lead to intrusive testing in confirmed areas of interest (GR0357).

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 the MoCS and the Ephorates in accordance with MoU Schedules 4 and 5. These reports will be subject to COMPANY review and MoCS approval.

Any observed impacts to cultural heritage will be reported by the CHM to the 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 monitoring. Chance Finds may be made by any member of the Project including archaeologists, non-cultural heritage site workers or visitors.

2.3.1 Compliance framework

A Chance Finds Procedure is required by Greek law, EU legislation, EBRD PR8 (Cultural Heritage), and the Project Commitment Register Greece. A Chance Finds Procedure will be implemented on active construction fronts. This includes the monitoring of construction activities by professional archaeologists (CHM, appointed by the CONTRACTOR and approved by competent Ephorates) and the commitment to temporarily stop work in the vicinity of any new archaeological discovery (through the implementation of a stop work protocol). Construction activities at a Chance Find will resume only after the implementation of government-approved avoidance, minimisation, or mitigation measures (GR0339). The 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 or from archaeological trial trench investigations.

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 realized 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.

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

 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	12 of 31

2.3.2 Chance Finds Procedure

The COMPANY, CONTRACTOR and its subcontractors shall put in place the following Chance Finds Procedure that details the process to be followed in case an archaeological find is made during construction (GR0346) and apply it in the event that they encounter any movable or immovable objects, sites, structures or groups of structures having archaeological, paleontological, historical, architectural, religious, aesthetic or other cultural significance. The Chance Finds Procedure will be implemented at construction fronts. The management of any finds will be handled in accordance with MoU Schedules 4 and 5, Greek national requirements and EBRD PR8 requirements (GR0346).


In the case of a Chance Find, 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 their subcontractor) (GR0336). After stopping work, the CHM shall immediately report the discovery to the CONTRACTOR Supervisor, the competent Ephorats and the COMPANY's CHC or CHE. 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 CHM shall identify and verify the finding, and assess its significance. The Ephorate shall verify its significance with cooperation and support from the COMPANY's technical specialists and 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.

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 at a Chance Find, the Ephorate in conjunction with the MoCS and COMPANY are responsible for ensuring that the rescue is conducted according to international and Greek standards and with oversight and involvement of the appropriate government institutions (GR0338).

If, during the monitoring of the construction excavation works or any other Project works, or during archaeological trial trenching, cultural heritage is discovered, work shall cease immediately. According to the decision of the MoCS and the competent Ephorate in cooperation with the COMPANY and CONTRACTOR, rescue excavations will follow. The work will be undertaken by CONTRACTOR archaeologists under the supervision of the competent Ephorate. The rescue excavations will be implemented according to the relevant Greek legislation and the HGA, especially MOU Schedules 4 and 5.

Construction activities at an important Chance Find will resume only after the implementation of government-approved mitigation measures and/or treatment work and approval by the Central Archaeological Council or the competent Ephorate, as per MOU Schedule 5.

 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	13 of 31

2.3.3 Chance Finds reporting

Should a Chance Find be discovered, the CHC or CHM will complete a Chance Find Report to be submitted to the dedicated representative of the relevant Ephorate and the COMPANY CHE and CONTRACTOR CH representative. This report must contain the following information:

- date and time of the discovery
- location of the discovery (GPS coordinates and KP reference)
- description of the discovery
- significance of discovery
- estimated weight and dimensions i.e. feasibility to move the discovery
- estimated time needed to conduct excavation of discovery
- recommendation of how to proceed
- temporary protection measures implemented.


The relevant Ephorate shall decide action to be taken with respect to the Chance Find, in cooperation with the CHE, a COMPANY CHC, and CONTRACTOR. Such actions may include, but not be limited to:

- removal, if feasible, of artefact(s)/cultural site(s) deemed to be of high or moderate significance
- execution of further excavation within a specified distance of the discovery point of site(s) deemed to be of high significance
- decision to continue with the construction work.

2.3.4 Chance Finds documentation

CONTRACTOR will be required to maintain separate records of monitoring activities, Chance Finds, and Chance Find response measures executed, which will be reviewed and approved by COMPANY Cultural Heritage Staff. These records will 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). Additional reports aimed at fulfilling any specific CHA requirements or requests from MOC for the project work may be anticipated
- monthly reports summarizing monitoring and evaluation results, status of any site treatment measures required, instructions to CONTRACTOR, and other internal and external communications.

 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	14 of 31

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 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 include the first actions to be taken in the event of such discoveries. For further information, refer the 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 a professional assessment of their age to the local authority.


2.4 Protection of known cultural heritage sites

Known cultural heritage sites must be protected from Project-related damage. This includes sites identified in advance of construction activities from ESIA and pre-construction surveys and those found during construction (Chance Finds). Sites may be located on the Project right of way, adjacent to the right of way, or in close proximity.

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.

For archaeological sites, the COMPANY will engage the appropriate Greek authorities in further evaluation of sites and the use of intrusive and non-intrusive methods (GR0335).

The COMPANY will take all necessary precautions if conducting activities within the vicinity of any built cultural heritage sites along the pipeline route. However, if any Project-related damages to built cultural heritage should occur as a result of the CONTRACTOR's activities, CONTRACTOR will arrange for repair by conservation experts in coordination with the relevant authorities (GR0363).

 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	15 of 31

2.4.1 Protection from vibration

Structural damage from vibration can exacerbate the already diminished structural integrity of ancient or historic buildings. If the structural assessment undertaken by the COMPANY indicates that a site is at risk of impacts from vibration, CONTRACTOR after approval by the competent Ephorates shall ensure that the site will be structurally reinforced or otherwise stabilized, and appropriate measures are taken to avoid, or where this is not possible, minimise any possible damage that may occur due to Project-related activities (for more information see the Onshore Cultural Heritage CCP (GAL00-PMT-601-Y-TTM-0001).

In the case that all or part 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 (GR0349) after approval by the competent Ephorates and the CHE. Upon completion, the COMPANY shall determine whether reparations are sufficient, and if not may request further reparation measures to be provided by CONTRACTOR.

2.4.2 Protection from dust and other forms of stone pollution


Some forms of pollution can be damaging to stone architecture. If the COMPANY structural assessment indicates a risk of impacts from pollution, CONTRACTOR shall cover or otherwise protect the site from potential impacts. If dust from earthworks is the issue 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. Dust minimizing strategies such as water-spraying, maybe used around the at-risk site (GR0347). The CLO will ensure that all stakeholders are consulted prior to any sites being covered.

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 (GR0347). Upon completion, the Ephorates in cooperation with CHE and CHC shall determine whether the cleaning is sufficient, and if not may request further measures to be provided by CONTRACTOR.

2.4.3 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 (GR0345):

- noise-reducing barriers
- low-profile constructions
- proper sighting 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.

 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	16 of 31

2.4.4 Construction techniques

CONTRACTOR shall use appropriate construction techniques to avoid, or where this is not possible, minimise, any possible damage that may occur due to Project-related activities.

2.5 Community use of cultural heritage sites


To address and minimise or mitigate any unforeseen impacts, community consultation, through a COMPANY community liaison group, will take place throughout the life of the Project. If local concerns related to cultural heritage are brought up through the consultation process, the COMPANY CHA or CHE will coordinate with COMPANY Social specialists to address concerns and mitigate potential impacts.

The Third-Party Grievance Mechanism (<http://www.trans-adriatic-pipeline.com>) will also be in place as an outlet for local people to express complaints about the Project. If any criticisms related to the Project's management of cultural heritage are recorded through the Third-Party Grievance Mechanism, the CHE or CHA will coordinate with the COMPANY community liaison group representative and the COMPANY will respond to the grievance accordingly (GR0361).

CONTRACTOR will restrict the timing of construction, maintenance, and demolition activities so as not to disturb the use of cultural heritage sites. This will include stopping work at certain times when sites are in use, such as during significant events (weddings, religious festivals² etc.). Additional days and times of construction restrictions will be established through pre-construction stakeholder consultation (GR0344) undertaken by the COMPANY.

A CONTRACTOR Community Liaison Team will be primarily responsible for managing access to any potential visitor(s) (including professional researchers, local community groups, schools, etc.), provided that all HSSSE issues are covered (GR0360), and in coordination with the COMPANY.

² For example, construction in proximity to the Church of the Assumption (CH-115) will halt on August 15th, the date of a known religious festival that will take place at the church.

 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	17 of 31

3 Archaeological Work Project overview, scope and guidance

The following is specific guidance on the level of work to be undertaken. The work will be undertaken by archaeologists employed by the CONTRACTOR and they will work under the management and supervision of the competent Ephorate. Specifications or written schemes of investigation (WSI) shall be prepared by the competent Ephorate for each site to be investigated outlining the objectives of the work and resources to be used. The CONTRACTOR will supply the all necessary equipment that, as per the MOU, will be requested by the competent Ephorate. Archaeological trial trench investigations and Chance Find rescue excavation work will be the responsibility of the competent Ephorate and will be undertaken with archaeological staff and equipment that will be supplied by the CONTRACTOR in accordance with MOU Schedules 4 and 5.

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.

3.1 Phase 1: Review existing data


Areas of potential archaeological interest are identified by 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.

3.2 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 through focused field investigations 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 possible, the route can be changed (GR0333) or its impact reduced to minimise the damage to cultural heritage features.

Sites requiring work in this phase are identified in Table A1-1, which shows the sites where action is required as identified in the ESIA. This list represents all the sites found close to the project footprint area. Of these:

- 54 are classed as requiring 'Further Assessment' and a construction action of 'To be advised'. These relate to below ground sites where the full impact and appropriate mitigation cannot be currently identified
- 13 are classed as requiring 'Further Assessment with a construction action of 'Protect from damage' which generally applies to above ground structures such as churches or cemeteries.

 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	18 of 31

A further 293 sites have been identified during the ESIA baseline studies and not listed in Table A1-1. These were found on earlier route alignments that are not currently being used, or are far enough away from the current route not to be impacted.

3.3 Phase 3: Pre-construction excavations

In areas where damage to the resource is unavoidable, archaeological deposits are recorded by a planned excavation prior to construction activities. Phase 3 work will be carried out within the Project working strip at those sites identified during Phase 2 as containing significant remains. Phase 3 investigations involve archaeological data recovery, in which cultural data is recovered from the sites in the form of artefacts and recording of soils and features. Phase 3 investigation of a site results in a scientific report accompanied by artefacts prepared for museum curation. Phase 3 work therefore reflects a form of mitigation of Project impacts to such archaeological sites. An alternative mitigation measure is site avoidance by rerouting of the pipeline route, or re-design of facilities (GR0333). 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.


3.4 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). The discovery of Chance Finds can lead to rescue excavations to mitigate Project impacts.

3.5 Phase 5: Reporting

Study of material and preparation of reports on the archaeological works carried out during the Project. This phase includes 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 Greek national and international standards. Guidance for this work at an international level can be found in the UK based Chartered Institute for Archaeologists (IfA) codes and guidance's and the European Archaeological Association (EAA) codes.

 Trans Adriatic Pipeline	TAP AG Doc. no.:	GAL00-PMT-601-Y-TTM-0002	Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	19 of 31

4 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 (GR0340).


5 Monitoring and inspection

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

6 Related documents

The following is a list of documents with the ESMS which, amongst others, have content relevant to this CCP:

- Contractor's ESMS Framework Document (CAL00-RSK-601-Y-TTM-0001)
- Onshore Cultural Heritage CCP (GAL00-PMT-601-Y-TTM-0001)
- E&S Compliance Assurance Plan (CAL00-PMT-601-Y-TTM-0005)
- Stakeholder Engagement Strategy (TAP-HSE-ST-0009), available at www.trans-adriatic-pipeline.com
- Third-Party Grievance Mechanism (<http://www.trans-adriatic-pipeline.com>)
- Code of Conduct (TAP-GEN-PO-0001)
- HGA between the Hellenic Republic and TAP AG (L.4217/2013)
- MOUs with the MOC and the Competent Ephorates (Schedule 4 and 5 of HGA)

 Trans Adriatic Pipeline	TAP AG Doc. no.:		Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	20 of 31

APPENDIX 1

SITE-SPECIFIC 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 Greek 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 COMPANY cultural heritage commitments with brief explanation is provided in Table A1-2.


Table A1-1 Site-Specific Cultural Heritage Commitments.

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


KP	Site	Description	Commitment	Pre-Construction (COMPANY)	Construction Actions (CONTRACTOR)
11	CH350-E	Cist graves previously reported from this area	GR0364	Further assessment	To be advised
18	CH250-E	Place name Aspra Chomata (white soil area)	GR0388	Further assessment	To be advised
22	CH346-E	Mound close to Pylaia A, B sites. Possibly a cultural mound;	GR0364	Further assessment	To be advised
22	CH383-E	Cultural mound. Pottery scatters	GR0364	Further assessment	To be advised
41	CH335-E	Underground aqueduct	GR0369, GR0389	Further assessment	To be advised
41	CH336-E	Road shrine dedicated to Virgin Mary	GR0390, GR0403	Further assessment	Protect from damage
42	CH376-E	Pottery scatter	GR0364, GR0403, GR0404, GR0405	Further assessment	To be advised
45	CH370-E	Unknown church	GR0390, GR0403, GR0405	Further assessment	Protect from damage
46	CH339-E	Chapel of Aghios Markos	GR0364, GR0390, GR0405	Further assessment	Protect from damage
46	CH394-E	Stone paved road close to Ag. Markos chapel	GR0365, GR0390, GR0403, GR0405	Further assessment	To be advised
57	CH334-E	Fire tower	GR0366, GR0405	Further assessment	Protect from damage
59	CH333-E	Stone pillbox	GR0390, GR0403, GR0405	Further assessment	Protect from damage
63	CH388-E	Pottery scatter	GR0368	Further assessment	To be advised
78	CH115-E	Bronze statuette of Hermes Chance Find	GR0344, GR0399, GR0400, GR381, GR0403, GR0405	Further assessment	To be advised
84	CH353-E	Pottery scatter	GR0370, GR0403, CH0405	Further assessment	To be advised

 Trans Adriatic Pipeline	TAP AG Doc. no.:		Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	21 of 31

KP	Site	Description	Commitment	Pre-Construction (COMPANY)	Construction Actions (CONTRACTOR)
84	CH354-E	Pottery scatter	GR0370, GR0403, CH0405	Further assessment	To be advised
87	CH391-E	Pottery scatter	GR0370	Further assessment	To be advised
110	CH34-E	Pottery scatter	GR0370	Further assessment	To be advised
119	CH33-E	Pottery scatter	GR0370	Further assessment	To be advised
123	CH36-E	Justinian Walls and Aqueduct	GR0371, GR0391, GR0392, GR0403, GR0404, GR0405	Further assessment	To be advised
136	CH25-E	Iron age and Roman graves previously reported in this area	GR0372	Further assessment	To be advised
139	CH23a-E	Cluster of 5 tombs of Post-Hellenistic Period	GR0375, GR0393	Further assessment	To be advised
147	CH20-E	Pottery scatter	GR0372	Further assessment	To be advised
150	CH18-E	Area of low archaeological significance	GR0372, GR0378	Further assessment	To be advised
154	CH12a-E	Prehistoric settlement.	GR0372, GR0394, GR0403, GR0405	Further assessment	To be advised
168	CH11a-E	Settlement of Prehistoric and Roman period, on DESFA pipeline	GR0393, GR0394, GR0403, GR0405	Further assessment	To be advised
170	CH15LK-E	Byzantine castle	GR0354	Further assessment	To be advised
171	CH10a-E	Wall, settlement and finds of Classical and Hellenistic Periods	GR0372, GR0393, GR0403, GR0404, GR0405	Further assessment	To be advised
176	CH13a-E	Ancient town	GR0372, GR0394, GR0403, GR0405	Further assessment	To be advised
178	CH14-E	Pottery scatter	GR0393	Further assessment	To be advised
178	CH4LK-E	Defensive boundary	GR0373, GR0393, GR0394, GR0403, GR0405	Further assessment	To be advised
200	CH73LK-E	Ancient town of Filopoi	GR0403, GR0405	Further assessment	To be advised
240	CH19LS-E	Cemeteries of Classical and Hellenistic periods	GR0374, GR0393, GR0394	Further assessment	To be advised
354	CH31LT-E	Recognized archaeological area	GR0375	Further assessment	To be advised
361.8	CH-1	Pottery scatter	GR0375	Further assessment	To be advised
380	CH-3	Pottery scatter	GR0375	Further assessment	To be advised
380.4	CH-4	Pottery scatter	MCT Requirement	Further assessment	To be advised
380.7	CH-5	Pottery scatter	MCT Requirement	Further assessment	To be advised
412.5	CH-6	Pottery scatter	MCT Requirement	Further assessment	To be advised

 Trans Adriatic Pipeline	TAP AG Doc. no.:		Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	22 of 31

KP	Site	Description	Commitment	Pre-Construction (COMPANY)	Construction Actions (CONTRACTOR)
412.6	CH-7	Pottery scatter	MCT Requirement	Further assessment	To be advised
412.9	CH-8	Pottery scatter	MCT Requirement	Further assessment	To be advised
413.5	CH-9	Pottery scatter	GR0375	Further assessment	To be advised
414.4	CH-10	Pottery scatter	GR0375	Further assessment	To be advised
416	CH-13	Stone building remains	GR0375	Further assessment	To be advised
418.3	CH-14	Pottery scatter	GR0376	Further assessment	To be advised
419	CH-231	Polla Nera ancient cemetery	GR0377	Further assessment	To be advised
426.7	CH-79	Church of Aghios Nikolaos	GR0395, GR399, GR0405	Further assessment	Protect from damage
431.3	CH-80	Recreational area in forest clearing	GR0405	Further assessment	Protect from damage
437.6	CH-16	Pottery scatter	GR0378	Further assessment	To be advised
437.7	CH-17	Pottery scatter	GR0378	Further assessment	To be advised
440.4	CH-83	Kastro stone bridge	GR0396, GR0399	Further assessment	Protect from damage
445.6	CH-347	Roman and Byzantine period archaeological site	GR0397, GR379	Further assessment	To be advised
450	CH-88	Church of Ayios Athanassios	GR0379, GR0398, GR0399, GR0405	Further assessment	Protect from damage
465	CH-22	Pottery scatter	GR0380	Further assessment	To be advised
478.1	CH-121	Church of the Assumption	GR0399, GR0401, GR0405	Further assessment	Protect from damage
479.3	CH-23	Pottery scatter	GR0382	Further assessment	To be advised
480.5	CH-24	Pottery scatter	GR0382, GR0383	Further assessment	To be advised
480.6	CH-125	Unknown chapel	GR0399, GR0401, GR0405	Further assessment	Protect from damage
485.8	CH-130	Monastery of the Virgin Mary	GR0399, GR0401, GR0405	Further assessment	Protect from damage
486	CH-215	Church of Aghios Anthonios	GR0399, GR0401, GR0405	Further assessment	Protect from damage
486.7	CH-213	Trinity Chapel	GR0399, GR0401, GR0405	Further assessment	Protect from damage
486.8	CH-214	Church of Aghios Athanasios	GR0399, GR0401, GR0405	Further assessment	Protect from damage
486.9	CH-212	Prophet Elias Church	GR0399, GR0401, GR0405	Further assessment	Protect from damage
491.2	CH-29	Pottery scatter	GR0384	Further assessment	To be advised
497.6	CH-30	Pottery scatter	GR0385	Further assessment	To be advised

 Trans Adriatic Pipeline	TAP AG Doc. no.:		Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	23 of 31


KP	Site	Description	Commitment	Pre-Construction (COMPANY)	Construction Actions (CONTRACTOR)
497.8	CH-31	Pottery scatter	GR0385	Further assessment	To be advised
497.9	CH-32	Pottery scatter	GR0385	Further assessment	To be advised
501	CH-137	Church of Aghios Nikolaos	GR0399, GR0401, GR0405	Further assessment	Protect from damage
506	CH-35	Pottery scatter	GR0386	Further assessment	To be advised
506.1	CH-162	Chapel and graveyard	GR0399, GR0401, GR0405	Further assessment	Protect from damage
506.2	CH-36	Pottery scatter	GR0386	Further assessment	To be advised
513.5	CH-38	Pottery scatter	GR0387	Further assessment	To be advised

Table A1-2 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 KP location is shown (this can then be compared against the site specific table A1-1).

Table A1-2 Explanation of Cultural Heritage Commitments


Number	Location	Action required
GR0333	General	Avoidance of known cultural heritage sites through Project design, if technically feasible. Avoidance, through additional local re-routings or relocations, is the preferred mitigation method and will be considered along with the mitigation measures listed under chapter 8.17.4 of the ESIA
GR0334	General	Where it is not possible to avoid monuments or sites with ICH value (i.e. those locations where the working strip is already reduced to the minimum width and cannot be deviated), relocation, replacement and compensation will be considered and discussed as options with relevant stakeholders.
GR0335	General	For archaeological sites, the Project will engage the appropriate Greek authorities in further evaluation of sites and the use of intrusive and non-intrusive methods

 Trans Adriatic Pipeline	TAP AG Doc. no.:		Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	24 of 31


Number	Location	Action required
GR0338	General	If archaeological rescue is required at a Chance Fnd, the rescue will be conducted according to international and Greek standards and with oversight and involvement of the appropriate government institutions
GR0339	General	Chance Finds Procedures will be implemented on active construction fronts. This includes the monitoring of construction activities by a professional archaeologist and the commitment to temporarily stop work in the vicinity of any new archaeological discovery. Construction activities at a Chance Find will resume after the implementation of government-approved mitigation measures.
GR0340	General	Inclusion of guidelines in the workers' Code of Conduct to prohibit employee activities that might interfere with nearby cultural heritage sites
GR0341	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 8.17.4 of the ESIA
GR0344	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, construction in proximity to the Church of the Assumption (CH-115) will halt on August 15th, the date of a known religious festival that will take place at the church. Additional days and times of construction restrictions will be established through pre-construction stakeholder consultation.
GR0345	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 maximize 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.
GR0346	General	The Project will implement a Chance Finds Procedure that details the process to be followed in case an archaeological find is made during construction. The management of any finds will be handled in accordance with Greek national requirements and EBRD PR8 requirements.
GR0347	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-minimizing 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

 Trans Adriatic Pipeline	TAP AG Doc. no.:		Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	25 of 31


Number	Location	Action required
GR0349	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.
GR0356	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
GR0357	General	Pre-construction mitigation will include aerial image analysis along the base case route to identify potential areas of interest for further investigation. Where available, historic maps will be compared to the results of the remote sensing analyses. The Project will also engage local landowners in areas of interest to ascertain whether results of analyses indicate potential subsurface ancient structures or more recent land use patterns. Relevant GIS layers will be produced to allow for an integrated assessment of visual analysis and historic data. The findings of this pre-construction mitigation may lead to intrusive testing in confirmed areas of interest.
GR0359	General	In case avoidance is not possible, special crossing method for linear cultural heritage resources may be implemented. This crossing method will be determined after further site evaluation and in agreement with the competent authorities.
GR0360	General	Community liaison team will be responsible for managing access to any potential visitor (including professional researchers, local community groups, schools, etc.), conditionally that all HSE issues are covered.
GR0361	General	In order to address and mitigate any unforeseen impacts, community consultation, through a community liaison group, will take place throughout the life of the Project. If local concerns related to cultural heritage are brought up through the consultation process, the Cultural Heritage specialists group will coordinate with Social specialists to address concerns and mitigate potential impacts. A grievance mechanism will also be in place as an outlet for local people to express complaints about the Project. If the grievance mechanism records any criticisms related to the Project's management of cultural heritage, the Cultural Heritage group will coordinate with the community liaison representative and TAP AG will respond to the grievance accordingly.
GR0363	General	TAP AG will take all necessary precaution when conducting activities within vicinity of any built heritage sites along the pipeline route, however, if any Project-related damages to built-heritage should occur, TAP AG will arrange for repair by conservation experts in coordination with the authorities.
GR0364 GR0366 GR0370 GR0372 GR0374	KP 11, 22, 42, 43 KP 57 KP 84, 87, 110, 119 KP 136, 147, 150, 154, 171, 176 KP 240	Direct physical disturbance of or damage: <ul style="list-style-type: none"> • Further research and Site Evaluation • Avoidance • Government engagement • Marking and protection • Rescue

 Trans Adriatic Pipeline	TAP AG Doc. no.:		Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	26 of 31


Number	Location	Action required
GR0375 GR0376 GR0377 GR0378 GR0379 GR0380 GR0386 GR0387	KP 139, 354, 361, 380, 413.5, 414.4, 416 KP 418.3 KP 419 KP 150, 437.6, 437.7 KP 450 KP 465 KP 506, 506.2 KP 513.5	<ul style="list-style-type: none"> • Minimum working strip • Guidance in Code of Conduct • Cultural Heritage Management Plan (archaeological monitoring and “Chance Finds” procedure)
GR0365 GR0369	KP 46 KP 41	<p>Direct physical disturbance of or damage:</p> <ul style="list-style-type: none"> • Evaluation • Avoidance • Further site evaluation • Government engagement • Marking and protection • Rescue • Guidance in Code of Conduct • Cultural Heritage Management Plan (archaeological monitoring and “Chance Finds” procedure) • Special crossing method shall be investigated
GR0367	General	<p>Direct physical disturbance of or damage:</p> <ul style="list-style-type: none"> • Evaluation • Avoidance • Further site evaluation • Government engagement • Marking and protection • Rescue • Minimum working strip
GR0368	KP 63	<p>Direct physical disturbance of or damage to a resource</p> <ul style="list-style-type: none"> • Evaluation • Avoidance

 Trans Adriatic Pipeline	TAP AG Doc. no.:		Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	27 of 31


Number	Location	Action required
		<ul style="list-style-type: none"> • Further site evaluation • Government engagement • Marking and protection • Rescue • Guidance in Code of Conduct • Cultural Heritage Management Plan (archaeological monitoring and “Chance Finds” procedure)
GR0371	KP 123	Direct physical disturbance of or damage: <ul style="list-style-type: none"> • Evaluation • Avoidance • Further site evaluation • Government engagement • Marking and protection • Rescue • Guidance in Code of Conduct • Cultural Heritage Management Plan (archaeological monitoring and “Chance Finds” procedure) • Special crossing method shall be investigated
GR0373	KP 178	Direct physical disturbance of or damage: <ul style="list-style-type: none"> • Evaluation • Avoidance (possible local rerouting or special crossing method as will be decided based on further consultation with competent authority) • Further site evaluation • Government engagement • Marking and protection • Rescue • Guidance in Code of Conduct • Cultural Heritage Management Plan (archaeological monitoring and “Chance Finds” procedure)
GR0381	General	Direct physical disturbance of or damage: <ul style="list-style-type: none"> • Evaluation • Avoidance • Community consultation • Record of structure conditions and monitoring • Marking and protection

 Trans Adriatic Pipeline	TAP AG Doc. no.:		Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	28 of 31


Number	Location	Action required
		<ul style="list-style-type: none"> • Minimum working strip • Guidance in Code of Conduct • Cultural Heritage Management Plan
GR0382 GR0383	KP 479.3, 480.5 KP 480.5	Direct physical disturbance of or damage: <ul style="list-style-type: none"> • Evaluation • Avoidance • Further site evaluation • Government engagement • Marking and protection • Rescue • Guidance in Code of Conduct • Cultural Heritage Management Plan (archaeological monitoring and “Chance Finds” procedure)
GR0384 GR0385	KP 491.2 KP 497.6, 497.8, 497.9	Direct physical disturbance of or damage: <ul style="list-style-type: none"> • Evaluation and “Chance Finds” procedure • Avoidance • Further site evaluation • Government engagement • Marking and protection • Large Scale Rescue Investigations (Data Recovery and Public Information Programs) • Guidance in Code of Conduct • Cultural Heritage Management Plan (archaeological monitoring)
GR0388	KP 18	Degradation of or damage due to pollution (mainly dust) and vibration: <ul style="list-style-type: none"> • Avoidance • Evaluation • Record of structure conditions and monitoring • Structural reinforcement? • Low impact construction techniques • Vibration-minimizing techniques • Minimum Working Strip • Protection • Stop construction (wet conditions, most likely to occur Nov 1- Apr 15)

 Trans Adriatic Pipeline	TAP AG Doc. no.:		Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	29 of 31

Number	Location	Action required
		<ul style="list-style-type: none"> • Conservation
GR0389	KP 41	Degradation of or damage due to pollution (mainly dust) and vibration: <ul style="list-style-type: none"> • Avoidance • Evaluation • Record of structure conditions and monitoring • Structural reinforcement? • Low impact construction techniques • Vibration-minimizing techniques • Protection • Stop construction (wet conditions, most likely to occur Nov 1- Apr 15) • Special crossing method shall be investigated
GR0390	KP 41, 45, 46, 59	Degradation of or damage due to pollution (mainly dust) and vibration: <ul style="list-style-type: none"> • Avoidance • Evaluation • Record of structure conditions and monitoring • Structural reinforcement? • Low impact construction techniques • Vibration-minimizing techniques • Minimum Working Strip • Protection • Stop construction (wet conditions, most likely to occur Nov 1- Apr 15) • Conservation
GR0391	KP 123	Degradation of or damage due to pollution (mainly dust) and vibration: <ul style="list-style-type: none"> • Avoidance • Special crossing technique • Evaluation • Record of structure conditions and monitoring • Structural reinforcement? • Low impact construction techniques • Vibration-minimizing techniques • Minimum Working Strip • Protection

 Trans Adriatic Pipeline	TAP AG Doc. no.:		Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	30 of 31

Number	Location	Action required
		<ul style="list-style-type: none"> • Stop construction (wet conditions, most likely to occur Nov 1- Apr 15) • Conservation
GR0392	KP 123	Degradation of or damage due to pollution (mainly dust) and vibration: <ul style="list-style-type: none"> • Avoidance • Evaluation • Record of structure conditions and monitoring • Structural reinforcement? • Vibration-minimizing techniques • Conservation • Special crossing method
GR0393 GR0394 GR0397 GR0400	KP 139, 168, 171, 178, 240 KP 154, 168, 176, 240 KP 445.6 KP 78	Degradation of or damage due to pollution (mainly dust) and vibration: <ul style="list-style-type: none"> • Avoidance • Evaluation • Record of structure conditions and monitoring • Structural reinforcement? • Low impact construction techniques • Vibration-minimizing techniques • Minimum Working Strip • Protection • Stop construction (wet conditions, most likely to occur Nov 1- Apr 15) • Conservation
GR0395 GR0396 GR0398 GR0399 GR0401	KP 426.7 KP 440.4 KP 450 KP 78, 440.4, 450, 478.1, 480.6, 485.8, 486, 486.7, 486.8, 486.9, 501, 506.1 KP 478.1, 480.5, 485.8, 486, 486.7,	Degradation of or damage due to pollution (mainly dust) and vibration: <ul style="list-style-type: none"> • Avoidance • Evaluation • Record of structure conditions and monitoring • Structural reinforcement • Vibration-minimizing techniques • Conservation

 Trans Adriatic Pipeline	TAP AG Doc. no.:		Rev. No.:	0
Contractor Logo	Doc. Title:	TAP Greece Cultural Heritage Management Plan	Page:	31 of 31

Number	Location	Action required
GR0402	486.8, 486.9, 501, 506.1 General	
GR0403	KP 41, 42, 45, 46, 59, 78, 84, 123, 154, 168, 171, 176, 178, 200	Disruption of user access: <ul style="list-style-type: none"> • Evaluation • Avoidance • Community and local authorities(ephorates) consultation • Planning to avoid user access restrictions • Alternate access • Public notification • Community liaison team to manage access
GR0404	KP 41, 123, 171	Disruption of user access: <ul style="list-style-type: none"> • Evaluation • Avoidance (local rerouting) • Community and local authorities(ephorates) consultation • Planning to avoid user access restrictions • Alternate access • Public notification
GR0405	KP 42, 45, 46, 57, 59, 78, 123, 154, 168, 171, 176, 178, 200, 426.7, 431.3, 450, 478.1, 480.6, 485.8, 486, 486.7, 486.8, 486.9, 506, 506.1	Negative effects on the setting and ambience: <ul style="list-style-type: none"> • Avoidance • Evaluation • Record of structure conditions and monitoring • Structural reinforcement • Vibration-minimizing techniques • Conservation