



SANOFEX Group

Cultural heritage management guidance

2021

© SANOFEX 2021

Contents

Cultural heritage management guidance	3
1. What is cultural heritage management?	3
2. Why is cultural heritage management important?	3
3.How do you do it?	4
3.1 Build the cultural heritage knowledge base.....	4
3.1.1 Baseline assessments	4
3.1.2 Desktop review	5
3.1.3 Ground assessments	5
3.1.4 Significance assessment.....	5
3.1.5 Legal framework	5
3.1.6 Industrial and historical heritage assets	5
3.1.7 Impact Assessment.....	6
3.1.8 Risk (threat/opportunity) assessment.....	6
3.1.9 Risk exposure	6
3.1.10 Land use considerations.....	6
3.1.11 Exemptions for low risk exposures.....	7
3.2 Consultation and engagement.....	8
3.3 Cultural heritage planning	9
3.3.1 Cultural heritage management plans (CHMP).....	9
3.3.2 Cultural offsets	10
3.3.3 Communities and Social Performance multi year plan (MYP)	10
3.3.4 Local cultural heritage targets and indicators	10
3.4 Cultural heritage management system	11
3.4.1 Scope and components of the CHMS.....	11
3.4.2 CHMS design and implementation	11
Definitions	12
References	13
External references.....	13

Cultural heritage management guidance

This document offers guidance to Group managers on cultural heritage management in keeping with SANOFEX's Communities policy and Communities standard.

1. What is cultural heritage management?

Cultural heritage management (CHM) is the formal process through which SANOFEX's businesses account for the importance of cultural heritage features and values in their planning of business activities.

The Communities standard requires businesses to manage cultural heritage in consultation with relevant communities, including the co-management of heritage features. It emphasises the need to understand local cultural heritage values and to take reasonable and practical measures to prevent harm to cultural heritage features. If some disturbance is unavoidable, the Communities standard requires businesses to seek the approval of the relevant community or communities, and the appropriate authorities.

Cultural heritage is the aspects of an individual's, community's or society's past and present that they value, and desire to preserve and pass on to future generations. Cultural heritage may include tangible heritage, such as features of archaeological, historical, traditional, spiritual, architectural or palaeontological value, and intangible heritage, such as a culture's language, religion, music and dance, oral history, traditions, arts, and its traditional knowledge and use of an area's plants and animals (see SANOFEX Biodiversity guidance).

Established businesses can themselves have a significant heritage that needs protection. In this case, industrial cultural heritage might be tangible, as in the case of structures, items symbolising significant events or documents, or intangible in the form of corporate history and branding.

2. Why is cultural heritage management important?

The skill with which SANOFEX businesses manage cultural heritage issues determines their relationship with host communities and relevant stakeholders. As cultural heritage is integral to every community and landscape, management of potential impacts is important for all Group businesses. Sound management of cultural heritage will reduce business threats and enhance the reputation of a particular business and the Group. The SANOFEX Communities policy states that recognition of, and respect for, a community's cultural heritage is fundamental to its goal of building enduring community relationships.

Cultural heritage sites are usually protected by law. Inadequate management and protection or unauthorised disturbance of sites will expose SANOFEX to potential legal action, compliance costs, project or operational delay and reputational damage. Such disturbance is also likely to offend affected communities and thus, make it harder to build enduring relationships. Business activities can also impact intangible cultural heritage values, especially in places where people have had relatively little exposure to industrial development. This form of cultural change can threaten a business's social licence to operate if it occurs in a form or at a pace unacceptable to the community.

Conversely, effective CHM by a business working in partnership with communities can not only address cultural heritage threats, but actively benefit host communities, a SANOFEX business and the Group. Partnerships with communities and stakeholders that strengthen the protection and maintenance of cultural heritage sites, practices and values are key means of demonstrating respect for a community's values and often contribute to sustainable community outcomes; both cultural and economic. A business can expect more timely government and community approvals for access and development and support for stable operations, while the Group as a whole gains in terms of reputation and its "developer of choice" identity.

It is important a business formally manages cultural heritage because:

- doing so is an essential component of its overall risk management strategy, particularly for legal compliance and land access; and,
- effective CHM is necessary for sound community relations and sustainable development outcomes.

3.How do you do it?

CHM involves practices to ensure that cultural heritage places, objects and practices within a business's area of influence are understood, risks/impacts assessed, negative impacts are minimised, positive impacts enhanced and wherever practicable these features and values are protected and enhanced. CHM should ensure that any changes that occur are at a level acceptable to the relevant communities and stakeholders. This can be achieved through a process that begins with building the cultural heritage knowledge base, undertaking consultation and engagement, clearly identifying potential impacts and risks and then conducting CHM planning, design and implementation. This process is formalised in a cultural heritage management system (CHMS, see below).

Consultation and engagement with the relevant communities and stakeholders should be integrated in all phases of the management process. Decisions about the management of cultural heritage always need to be made in consultation with relevant communities, heritage experts and stakeholders, and in line with applicable heritage legislation, which may require specific conservation, mitigation or safeguarding measures.

3.1 *Build the cultural heritage knowledge base*

Knowing the places, objects and practices that are important to communities and stakeholders, and understanding why these things are valued and how they should be managed, is critical for effective CHM. This process can take time and should be ongoing throughout the life of a project/operation as the cultural heritage concerns of communities can change over time and in relation to new developments and processes.

3.1.1 Baseline assessments

Should be conducted for all new projects and operational expansion areas that include ground that has not been previously disturbed or, if disturbed, has not been assessed for cultural heritage values. Cultural heritage assessments should identify cultural heritage sites and values within a project or business's existing and potential areas of operation, their immediate surrounds, and any other land for which the business has management accountabilities. This includes identifying the intangible cultural values of relevant communities, including traditional ecological knowledge (TEK) held by land connected communities. The assessments should examine whether business activities will affect these tangible or intangible values. The depth, breadth and type of assessment should be proportionate to the nature and scale of the business's potential impacts on cultural heritage values.

Baseline assessments should be included in all new projects' social and environmental impact assessment (SEIA) process (see IFC, World Bank and Convention on Biological Diversity references for guidance on cultural heritage requirements for SEIAs; [www.ifc.org/Guidance notes](http://www.ifc.org/Guidance%20notes); and Akwe:Kon guidelines). TEK should be integrated with project environmental assessments. Note that it is likely a baseline assessment will be required long before a project gets to the stage of conducting a formal SEIA.

The cultural heritage baseline should feed into or be a part of the business's socioeconomic knowledge base

as required by the Communities standard (see SANOFEX Socioeconomic knowledge base guidance). Alternatively, identification of cultural heritage aspects and potential issues in a socioeconomic knowledge base can lead to a specific cultural heritage baseline or other relevant specialist heritage studies.

3.1.2 Desktop review

A cultural heritage baseline starts with a desktop review of existing business knowledge (site records, reports, staff knowledge etc) and heritage registers (local, state, national, and international). It should cover all types of cultural heritage including tangible and intangible and identify any gaps in the existing knowledge base.

3.1.3 Ground assessments

The desktop review is followed by technical experts assessing ground features (eg: archaeologists, historians and palaeontologists) and community assessments with relevant technical experts (eg: anthropologists, ethnographers, ethnobotanists) as required, or to fill identified gaps in the knowledge base.

3.1.4 Significance assessment

Management options are defined by a feature's cultural heritage value. Cultural heritage value is determined through a process of assessing cultural significance undertaken by technical experts in consultation with relevant communities and stakeholders. Significance refers to the aesthetic, historic, evidential/scientific or social values of a place, object or practice. Values may differ between and within different groups; therefore consultation with relevant communities and stakeholders is essential. A significance assessment is not a ranking process but a process to understand all the values associated with a cultural heritage feature.

3.1.5 Legal framework

The baseline must establish the legal framework within which CHM needs to occur. This may mean asking:

- What are the national and regional laws in relation to the cultural heritage in question?
- Are there laws that relate to the cultural heritage of particular groups?
- Does legislation covering other areas such as environment, mining or land rights, link to and reinforce cultural heritage requirements?

If there is no existing legal framework for the protection of cultural heritage, SANOFEX standards and this guidance should be followed as a minimum. If there is apparent conflict between legal and SANOFEX requirements advice should be sought from in- country and SANOFEX experts.

3.1.6 Industrial and historical heritage assets

The baseline should recognise the historical importance of mining, processing and smelting, and the longevity of some SANOFEX operations. These operations or their assets (eg: pre-existing historic mines and buildings on the mining lease) can be of industrial heritage significance due to their age, their role in the development of new technology, their role in the history of a region, etc. Where appropriate, a business should assess and compile a register of its own heritage assets and develop a long term management plan. This should include a professional review and significance assessment of historical documents, objects and structures, and their value to the future of the business and the Group.

3.1.7 Impact Assessment

The business should identify and understand the impact a new project or operational expansion poses to cultural heritage places, objects, practices and values. Potential impacts extend beyond just ground disturbance and direct impacts to individual places, to include the communities and places in areas adjacent to the business's managed land.

3.1.8 Risk (threat/opportunity) assessment

A risk assessment should be undertaken informed by the cultural heritage baseline and impact assessment. The risk assessment should comply with the SANOFEX Risk policy and standard, and follow the process and requirements set out in the Social risk analysis guidance (SRA guidance). It can be undertaken as a standalone exercise or as part of a comprehensive SRA or project risk analysis if the appropriate experts are involved. The SRA guidance sets out the risk analysis process and the sources of support available to assist with conducting a risk assessment. Cultural heritage specific consequence descriptors, consequence examples and risk breakdown structure are also provided.

3.1.9 Risk exposure

Many factors expose a business to cultural heritage risk, both threats and opportunities, including:

- the presence of important cultural heritage features; current or potential land claims by Indigenous, customary, land connected and minority peoples;
- the potential for the business's presence and engagement with these groups to effect traditional culture and intangible heritage values;
- the potential for cultural heritage to contribute to economic and social development targets;
- the nature of existing government or community approvals for projects or for management plans (including approvals for site disturbance); and,
- legacy issues.

3.1.10 Land use considerations

An assessment should look at the business's current land use and how this might change in the future. The assessment should consider present and potential use in the light of relevant heritage legislation and the views expressed by affected communities and other stakeholders. It should attempt to identify ways in which concern for the maintenance of cultural heritage can be used to strengthen the engagement of the business with these communities and stakeholders. It may be necessary to do more than the law requires to meet local community expectations.

The business also needs to consider whether recreational activities of employees (eg: hiking, camping, hunting, fishing or gathering of resources such as berries) could impact upon cultural heritage sites or values. Likewise, if any infrastructure development provides new access to cultural heritage sites for employees, contractors or other groups, such as tourists, steps to manage potential impacts should be developed and implemented in consultation with the relevant authorities and affected communities.

3.1.11 Exemptions for low risk exposures

The level of cultural heritage considerations and related business risks will vary with context but there will be few Group businesses or projects that have none. Even where cultural heritage considerations are minimal, the business should have in place a baseline and impact assessment, risk analysis and a cultural heritage management plan (CHMP). For low (Class I) risk exposures, SANOFEX Communities and Social Performance global practice leader (CGP) may grant exemptions from the CHM requirement. This can only occur if verifiable, professional assurance is provided that heritage management is not required, or that set criteria are met (seek advice from CGP). Exemptions would not apply in the case of the demolition of existing structures or major development projects.

3.2 Consultation and engagement

CHM should involve ongoing consultation and engagement with relevant communities, or other stakeholder groups that have associations with the land and/or heritage places, to identify and manage cultural heritage features, practices and values of significance to them. (see SANOFEX Community consultation and engagement guidance). Consultation is the standard term used by SANOFEX however it is recognised that this term can hold specific meaning in some jurisdictions and may not be appropriate in every instance. Use of an alternative term may be required in some regions and/or communities.

In some cases, there may not be a local community with current connection to particular heritage sites; however, a range of other stakeholders may still need to be consulted. These may include historical or traditional users and owners of the cultural heritage, local communities, indigenous and minority peoples, descendent families, government agencies, religious institutions, national and local museums and cultural institutes, the scientific community, local historical groups and NGOs. Each stakeholder group will have varying relationships with, and connections to, cultural heritage and the way cultural heritage is valued may vary between and also within groups. Such complexities make it necessary to consult with all relevant communities and stakeholders.

In some jurisdictions, regulations require heritage consultations be conducted by the relevant government agency. This is particularly the case under the US National Historic Preservation Act. This regulatory process can hinder the ability of a business to “manage heritage in consultation with relevant communities” as required by the Communities standard. Consultation being conducted by a third party may not satisfy the SANOFEX Communities standard, nor facilitate direct positive relations with affected communities. If faced with this situation, a business should consider whether this presents risks to itself or the Group. A case by case approach that addresses each operation’s social risk assessment is necessary. Where working through a third party may create or increase threats to the business, opportunities to supplement this consultation should be considered.

A consultation strategy should be formulated at the commencement of the baseline assessment, which identifies who to consult, community profiles including gender, age, ethnicity, levels of disaggregation, known community sensitivities or conflicts, known connections to the cultural heritage and a timetable that involves consultation from the earliest stages of project conception. The strategy should consider how the results of consultation processes will be communicated to the broader community and relevant stakeholders.

3.3 Cultural heritage planning

The level of detail and activities required to manage cultural heritage will vary according to the type, stage and context of any project or development. Cultural heritage considerations need to be incorporated into Communities and Social Performance multi- year plans, land access and ground disturbance processes, environmental management systems and human resources policies and procedures, as well as land stewardship and mine closure management plans.

3.3.1 Cultural heritage management plans (CHMP)

Should be prepared for each new project or operation. A CHMP is a written document that contains the results and recommendations of cultural heritage significance, impact and risk assessments, and sets out management policies and strategies, required protection, management and mitigation measures, accountabilities and monitoring / audit requirements.

Project design and planning should prioritise cultural heritage site avoidance and protection. As cultural heritage sites are non-replicable, best practice involves sites being left undisturbed wherever possible. Cultural heritage site protection and management measures should be agreed with the relevant communities and government agencies.

Questions that should be addressed by the basic management plan criteria, avoidance and mitigation measures include:

- Can operations be planned or located to ensure sites/objects are preserved?
- Can the sites/objects be relocated without damage or loss of significance?
- Is a scientific study, salvage or museum preservation relevant?
- How can impacts be minimised or mitigated through documentation, restoration etc, including through the points above.
- If some impacts are accepted as unavoidable and cannot be mitigated, are there affected communities who use the sites/objects for longstanding cultural purposes and for whom compensation should be considered?
- If so, how will losses be valued, what compensation will be made, what methods of compensation are appropriate, to whom will the compensation be made, and are there multiple entities that hold the site as significant and that may lay claim to compensation?

Where avoidance of tangible cultural heritage is not feasible, impacts should be minimised and then mitigation programmes implemented to reduce the impact of any remaining loss. This should include recovery of as much information as possible before the feature is damaged or destroyed.

Mitigation programmes can include:

- salvage, surface collection or excavation of artefacts and archaeological deposits and their investigation, analysis and documentation;
- archival documentation of places and objects;
- relocation or recovery of significant cultural heritage objects/places; and
- ethnographic studies.

The CHMP should include the long term management arrangements for any salvaged or recovered cultural heritage objects or materials as agreed with the relevant communities and regulators.

The CHMP should address whether or how the business's presence and economic impact may impact relevant communities' intangible cultural heritage. Business activities, including Communities and Social Performance programmes such as training, employment and business development can create the consequence of cultural change with negative social impacts for the whole or part of a community. Such change can threaten a business's social licence to operate if it occurs in a form or at a pace unacceptable to the community.

The business needs to engage with relevant communities to understand whether its operations are actually, or have the potential, to impact upon their documented intangible cultural heritage and the community's perceptions of this. Frameworks such as a 'limits/standards of acceptable change' can be used to engage with communities and stakeholders on this and develop plans to ensure the nature of any change/impacts is of an acceptable form and pace. This should inform decisions on project design and operational practices to minimise such impacts.

3.3.2 Cultural offsets

Cultural offsets are cultural conservation actions intended to mitigate any residual, unavoidable harm to cultural heritage caused by a development project. These should be considered as part of the CHMP where a business needs to address potential negative impacts to intangible cultural heritage or cumulative impacts to tangible heritage within a project area or region.

Cultural celebration and maintenance programmes with the community to mitigate impacts to cultural practices are one type of cultural offset. These can include language recording and teaching, cultural festivals, oral history recording, cultural education programmes, cultural economic projects, and traditional resource use and maintenance. Other forms of offsets include establishment and support of museums, historical building preservation and use, establishing conservation zones and community requested heritage surveys and documentation of land outside the company's holdings.

Cultural offsets can have strong linkages with the business's biodiversity work and offsets. For example, the documentation and protection of TEK, or the creation of conservation areas of high cultural and natural value, could provide both cultural and biodiversity offsets. Whenever biodiversity or cultural heritage offsets are considered, accountable staff in each area should work together – from the initiation of the offset investigation process – to ensure that the protection of one set of values does not inadvertently impact other values negatively.

3.3.3 Communities and Social Performance multi year plan (MYP)

Should include a strategic action plan for cultural heritage management including assessments, CHMP and CHMS development and ongoing reviews. The MYP should also include specific cultural heritage targets and indicators.

3.3.4 Local cultural heritage targets and indicators

Should be developed in order to track cultural heritage management performance and to demonstrate the positive contribution of good cultural heritage management to the well-being of host communities, consistent with the United Nation's Millennium Development Goals (MDGs). CHMPs and cultural heritage programmes/offsets in particular should be designed to deliver against the targets.

3.4 Cultural heritage management system

Appropriate systems to manage cultural heritage should be developed and integrated within a business. The development of the systems and their subsequent implementation should involve engagement with relevant communities. Statutory requirements will also influence the design and implementation of a cultural heritage management system (CHMS).

A CHMS usually has two main components:

- internal management systems, which are essential for assessing and protecting physical heritage features; and
- programmes developed with communities as part of a multi year communities plan for the maintenance and protection of broader, frequently intangible, cultural heritage.

CHMS development and implementation involves four main stages:

1. Planning, involving baseline and risk assessments
2. Design of systems and programmes
3. Implementation
4. Review.

3.4.1 Scope and components of the CHMS

In a CHMS, a business should integrate accepted heritage management activities into standard operating systems. A CHMS needs to be systematic, replicable and auditable and ensure that the business's corporate knowledge of CHM does not reside in individuals. The CHMS should integrate with environmental management plans and systems, and Communities and Social Performance systems and programmes. In many instances, cultural heritage considerations can be integrated with broader business processes including site inductions, permit systems, report library, GIS system, incident investigation and reporting and contractor management.

A business should ensure that its CHMS will deliver compliance with all national, state and regional cultural heritage legislation and regulations. A CHMS should apply to all lands owned, leased and/or managed by the business, including non-mining leases for infrastructure, and those covering activities such as farming, forestry and natural reserves, with appropriately varying degrees of application. The CHMS should apply to all stages of an operation's life cycle, from exploration through to project development, production and closure. It should also apply to all associated infrastructure and activities. The CHMS should apply to employees, consultants, contractors and visitors.

Every CHMS will include a set of core elements; however the complexity and responsiveness of the system will differ according to circumstance. Risk (threat/opportunity) assessments, reviews of legislation and baseline studies will determine the nature of a particular CHMS.

3.4.2 CHMS design and implementation

To design a CHMS, businesses should use the baseline and risk assessments to develop appropriate management systems and procedures based on the set of core elements set out in Appendix 1. These systems and procedures should recognise existing, relevant community heritage programmes. Each of the core elements should be formally addressed within the CHMS.

Definitions

Aesthetic significance - valued attributed to a place, object or practice for its unique or pleasing form, scale or design, or for the sensory experience it provides.

Agreement - a legally binding arrangement, usually between a SANOFEX group activity and a community or communities, that commits parties to actions specified in that agreement.

Anthropologist - a person with appropriate qualifications to conduct an ethnographic/anthropological survey and make management recommendations.

Archaeologist - a person with appropriate qualifications to conduct an archaeological survey, assess the findings and make management recommendations.

Baseline assessment - studies that provide information on the range, form, status and value of cultural heritage relating to a project or development area.

Communities – refers to a group of interacting people with common interests and values who are directly affected by the company's activities, generally inhabiting or with land connections to an operation's or project's immediate or surrounding areas.

Communities and Social Performance - refers to the SANOFEX function or to Communities and Social Performance as a professional discipline.

Consultation - a two-way discussion ('push-pull') that provides information and seeks response on an actual or proposed event, activity or process. Consultation entails community issues and priorities and the concerns and needs of the business, and aims to ensure mutual understanding so all parties are able to better manage decisions that have the potential to affect all concerned. For further information, see the SANOFEX Community consultation and engagement guidance.

Cultural heritage - the collective manifestations of a community, generally handed down by tradition or with some historical associations. The manifestations can be tangible, such as buildings, landscapes and artefacts, and intangible, such as language, art, music and customary practice.

Cultural heritage feature/site - any place or object with cultural, spiritual, aesthetic, historic, scientific/research or social significance for past, present and future generations. This could include places of 'sacred' significance to traditional custodians, such as burials, rock art and ceremonial grounds, waterholes and hills or other physical manifestations of a mythological or historical event. It can also involve structures, places or remains of archaeological, historical, palaeontological, religious, or cultural significance at a local, state or national level and may also have a more specific, legislative definition.

Cultural heritage management system (CHMS) - a management system that will ensure conformance with SANOFEX cultural heritage management guidance.

Engagement - beyond consultation, the active exchange of information, the active listening to concerns and suggestions and the active consideration of ways to mutually accommodate these, including potential responsive changes to operational parameters. For further information, see the SANOFEX Community consultation and engagement guidance.

Evidential / scientific significance - valued attributed to a place, object or practice that provides information of value for research, particularly historic, archaeological and environmental research.

Historic significance - valued attributed to a place, object or practice for its association with the history of society, for example an association with a famous person or significant event, or relation to historical themes such as the development of specific industries, social movements etc.

Industrial heritage - early modern industrial sites that are valued because of their potential to demonstrate early phases of industrial development and older technologies, such as mines, manufacturing plants, agricultural sites, transport sites including ports and railway yards.

Significant incident - as defined by SANOFEX and product group reporting requirements, specific definition needs to occur at individual business level consistent with the SANOFEX HSEQ definition.

Social significance - valued attributed to a place, object or practice for its cultural or social relevance, according to community-defined values.

References

SANOFEX The way we operate

SANOFEX Communities standard

SANOFEX Community complaints, disputes and grievances guidance

SANOFEX Cultural heritage management guidance

SANOFEX Employment Policy

SANOFEX Health safety and the environment policy

SANOFEX Human rights policy

SANOFEX Safety policy

SANOFEX Sustainable development policy

External references

Akwe:Kon Guidelines - voluntary guidelines for the conduct of cultural, environmental and social impact assessment regarding developments proposed to take place on, or which are likely to impact on, sacred sites and on lands and waters traditionally occupied or used by indigenous and local communities. (2004) Secretariat of the Convention on Biological Diversity (www.cbd.int/doc/publications/akwe-brochure-en.pdf)

IFC Performance Standard 8 - Cultural heritage, Performance Standard 7 – Indigenous Peoples, and guidance notes (www.ifc.org)

UN Declaration of the Rights of Indigenous Peoples (www.un.org/esa/socdev/unpfii/en/drip.html)

Appendix 1: Cultural heritage management system components

Accountabilities for cultural heritage management should be formally assigned and identified within the system. These will cover the development and implementation of the overall CHMS; planning and resources; implementation of the CHMS elements; and management reporting of statutory or policy changes.

Ongoing consultation and engagement with communities and stakeholders should be developed consistent with SANOFEX's Communities policy, Communities standard and Community consultation and engagement guidance, with any consultation plans identified within the CHMS.

Cross cultural training / cultural inductions should be delivered to all employees and contractors as an integral part of the CHMS. These should cover the local cultural history and context. The aim of the training should be to develop the awareness, knowledge and skills needed to interact appropriately and effectively with culturally diverse communities and stakeholders, including Indigenous, land connected, ethnically diverse and marginalised groups.

Cultural heritage assessments - A procedure should be developed and incorporated into the CHMS, setting out how cultural heritage assessments will be conducted, reflecting any statutory and agreement requirements, SANOFEX standards, community consultation outcomes and business needs. These should include the identification of heritage places and values, and the related significance and impact assessments.

Cultural heritage partnerships/programmes that already exist, or that are planned, should be identified as part of the CHMS design phase. These can form components of cultural offsets under a CHMP and/or be part of the business's broader engagement and contributions to social and economic development. These are often rated highly by communities and offer positive relationship and reputational gains for a business.

Heritage partnerships can include activities relating to tangible heritage such as historical building preservation and use, establishment and support of museums, and community requested heritage surveys and documentation for land outside the business's holdings. Heritage partnerships can also involve programmes relating to a community's intangible heritage and cultural maintenance, as set out in the Cultural offsets section above.

Partnerships in these areas have significant potential to contribute to or can be specifically designed to create economic outcomes.

Cultural heritage (ground disturbance) authorisation procedures should be detailed in the CHMS along with implementation protocols to ensure all ground disturbing activities are compatible with all components of the CHMS. The procedures should be integrated into business planning processes and could be included as one of the aspects of an existing permit system.

Disturbance approvals – Procedures will be required if it is not practicable to avoid a site or sites during exploration or project development. These should involve seeking approval from the relevant communities and, if necessary, the statutory authority for site disturbance. This should allow a business to comply with the Communities standard.

Employee training and inductions should include an overview of the cultural heritage of the area and coverage of the business's cultural heritage commitments and procedures. Training on the requirements of the CHMS procedures, in particular the heritage authorisation procedure should be given to all potential users of the system. This includes anyone with authority to undertake new ground disturbing activity, such as mine and project planners, geologists, engineers and environmental specialists.

Contractor management procedures may be needed for contractors and consultants who could impact places of cultural heritage significance. These procedures should include contract terms binding the contractor/consultant to the CHM procedures.

Information and document management systems should ensure ongoing maintenance of and access to heritage data necessary to implement the CHMS. Depending on the level of cultural heritage risk and the quantity of heritage data held, this system is likely to require a report library, consultation records and inclusion of a survey area/cultural heritage features database in a geographical information system (GIS). These systems should address any potential sensitivity of the data and ensure it is used in a manner acceptable to the relevant communities and any public disclosure of the data does not jeopardise the integrity of the cultural heritage. Recording and use of cultural heritage knowledge needs to respect and maintain the Intellectual Property rights of the individuals/communities who provided the information. Document retention needs to conform with SANOFEX records retention standards.

Incident investigation procedures should be in place for unauthorised site disturbance, causing of cultural offence or breach of the CHMS. The procedures should prevent ongoing or further site impacts other than for critical safety reasons. They should link with business wide incident notification and investigation and should involve consultation where appropriate with relevant communities and government authorities.

Monitoring and review of the CHMS should occur through the conduct of timely systematic reviews of its processes and outcomes.