



Hagler Bailly Pakistan



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Appendix G: Chance Find Procedure



Hagler Bailly Pakistan

**Environmental and Social Impact
Assessment of
Reko Diq Mining Project**

Chance Find Procedure

Final Report

HBP Ref.: R4CF1RKG

October 1, 2024

Reko Diq Mining Company

Quetta

Chance Find Procedure

Objective

Based on the surveys carried out previously, there are no unique or natural features of high cultural values, such as sacred graves, groves, rocks, lakes and/or waterfalls in the vicinity of the Project that need to be protected. Four archaeological sites and eleven unidentified rock features have been identified in or near the Project footprint. The likelihood of buried remains near the four archaeological sites is considered “low” in view of the site characteristics. Nonetheless, artefacts of archaeological concern may be found during construction including earthworks.

This Procedure provides the approach to site clearance and resumption of works should chance finds occur.

Applicability and Scope

It applies to all workers of the Project Company including contractors who witness or identify a potential chance find during excavation and earthworks.

Definition(s)

Relevant to this ‘Chance Find Procedure’ and the project the potential ‘chance finds’ include, as defined by IFC Performance Standard 8:

‘tangible moveable or immovable objects, property, sites, structures or groups of structures, having archaeological (prehistoric), paleontological, historical, cultural, artistic and religious values’

The definition above broadly covers the definition in the Balochistan Antiquities Act, 2014 (as enacted in the province of Balochistan), with the exception that tangible heritage of *scientific* value is also included.

Under the Balochistan Antiquities Act, 2014 “antiquity” means

- (i) any ancient product of human activity, movable or immovable, illustrative of art, architecture, craft, custom, literature, morals, politics, religion, warfare or science or of any aspect of civilization or culture;
- (ii) any ancient object or site of historical, ethnographical anthropological, military or scientific interest;
- (iii) any national monument; and
- (iv) any other object or class of such objects declared by the Provincial Government, by the Notification in the Official Gazette, to be an antiquity for the purposes of this Act;

Within this document ‘chance finds’ and ‘antiquities’ are used interchangeably.

Frequency

This procedure shall be referred to and followed on occurrence of chance find or occurrence of severe non-conformance.

Responsibilities

The RDMC Environment and Community Manager is responsible for the implementation of this procedure. All staff including contractors engaged in excavation and earthworks activities must understand and follow the requirements and procedure of this procedure.

The RDMC Environment and Community Manager must:

- ▶ Ensure staff are aware of and trained in this procedure.
- ▶ Maintain documentation and keep record of chance find (see template for a chance find in **Appendix A**.) Maintain ongoing communication with the Community Focal Persons (CFPs) through Community Liaison Officer (CLO) to ensure that find(s) of cultural significance to nearby communities can be appropriately claimed by communities.
- ▶ Review and update the procedure, if needed, on an annual basis.

Applicable Laws and Standards

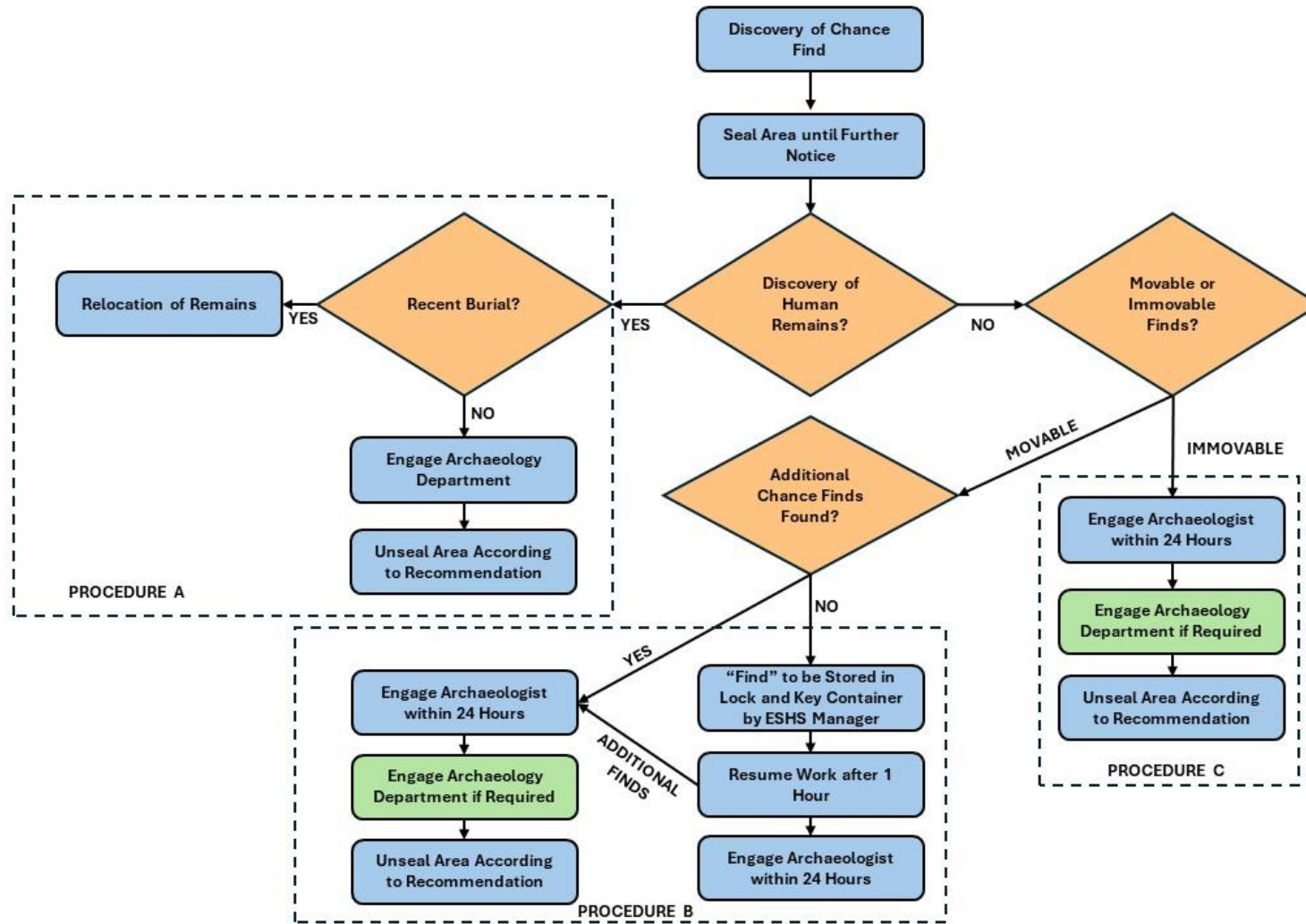
The following relevant legal laws are applicable:

- ▶ The Balochistan Antiquities Act, 2014 (as enacted in the province of Balochistan)
 - ▷ Director of Archaeology and Museums, Government of Balochistan to be contacted within a timeframe of 7 days upon accidental discovery of antiquity for custody and preservation. (Section 6(1)(2))
 - ▷ No development plan or scheme or new construction on, or within a distance of two hundred feet, of a Special Premises shall be undertaken or executed except with the approval of the Government or a Committee (see Section 22).
- ▶ IFC Performance Standard 8 (Cultural Heritage)
 - ▷ The client will not disturb any chance find further until an assessment by competent professionals is made and actions consistent with the requirements of this Performance Standard are identified.

Procedures

A flowchart of the procedures to be followed is provided in **Exhibit 1**.

Exhibit 1: Chance Find Procedure



Initial Identification and/or Exposure and Cease of Activity

1. The person or group (identifier) who identified or exposed 'find' must cease all activity in the immediate vicinity of the site (that may harm the 'find' or 'potential find').
2. The find location will be recorded, and the 'find' will be left in place.
3. The identifier must immediately inform his/her supervisor of the discovery.
4. The supervisor will temporarily cease construction around the find(s) until further notice and inform the RDMC Environment and Community Manager.
5. If the find(s) include human remains, then Procedure A below will be followed.
6. If the find(s) does not include human remains, it will be mutually determined by the RDMC Environment and Community Manager or their delegate whether the find(s) are movable (upon which **Procedure B** will be followed) and if there is a chance of additional find(s) in case of movable finds.

Procedure A - Follow-up Actions Following Discovery of Human Remains

1. In the case of finding human remains, the RDMC Environment and Community Manager shall determine within 72 hours whether these represent a recent burial or not.
2. In the case of recent burials, enquiries will be made in the community concerning the affiliation of the deceased for the relocation and reinterment of the remains and will be logged in the Chance Finds Register.
3. If the remains are determined to be of historic significance, the Director of Archaeology and Museums will be consulted to determine if it is an archaeological site and will be added to the Register of Chance Finds.

Procedure B - Follow-up Actions Following Movable Find(s)

A movable find is any item considered small enough to be safely moveable without risk of damage. This can include coins, jewellery, or small handicrafts and items commonly classified as *artifacts* within IFC PS 8. If the RDMC Environment and Community Manager determines the find is movable, they shall:

- 1 Estimate whether additional find(s) can occur.
- 2 If it is unlikely that more find(s) will occur, the object will be transferred to custody of the RDMC Environment and Community Manager in a container secured by lock and key. The construction activity will resume after 1 hour. If another find occurs during the construction phase, then it shall be assumed that there are likely to be more.
- 3 If it is likely that more find(s) will occur, an archaeologist will be engaged.
- 4 The archaeologist will assess the potential significance of the find and determine the course of action.

- 5 If the significance of the find(s) is judged to be sufficient to warrant further action, then the Director of the Archaeology and Museums Department, Government of Balochistan will be informed within 7 working days.
- 6 The archaeologist in consultation with the Archaeology and Museums Department, Government of Balochistan will determine the appropriate course of action.

Procedure C - Follow-up Actions Following Immovable Find(s)

Immovable find(s) include ruins of archaeological value or items such as historical ruins and statues, which are difficult to move without damaging or it cannot be determined whether they are safe to move. In the event of an immovable find:

- 1 An archaeologist will be engaged.
- 2 The archaeologist will assess the potential significance of the 'find'.
- 3 The archaeologist will assess the potential significance of the find and determine the course of action.
- 4 If the significance of the find(s) is judged to be sufficient to warrant further action, then the Director of the Archaeology and Museums Department, Government of Balochistan will be informed within 7 working days.
- 5 The archaeologist in consultation with the Balochistan Archaeology and Museums Department will determine the appropriate course of action.

Contacts

Contact details of the members of the Directorate of Archaeology & Museum are provided below:

- ▶ Name: Jameel Hussain
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The information within this procedure needs to be reviewed and updated on an annual basis by the RDMC Environment and Community Manager.

Exhibit 2: Template for a Chance Find

Date	Time	Reported		Location		Object Type	Entities Engaged	Extended Sealing Period	Actions Taken	Area Unsealed On	Verified by	
		By	To	Latitude	Longitude						ESHS Manager	Project Manager
						<input type="checkbox"/> Human Remains <input type="checkbox"/> Movable object <input type="checkbox"/> Immovable object	<input type="checkbox"/> CFP <input type="checkbox"/> Archaeologist <input type="checkbox"/> Archaeology Department					
						<input type="checkbox"/> Human Remains <input type="checkbox"/> Movable object <input type="checkbox"/> Immovable object	<input type="checkbox"/> CFP <input type="checkbox"/> Archaeologist <input type="checkbox"/> Archaeology Department					
						<input type="checkbox"/> Human Remains <input type="checkbox"/> Movable object <input type="checkbox"/> Immovable object	<input type="checkbox"/> CFP <input type="checkbox"/> Archaeologist <input type="checkbox"/> Archaeology Department					
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