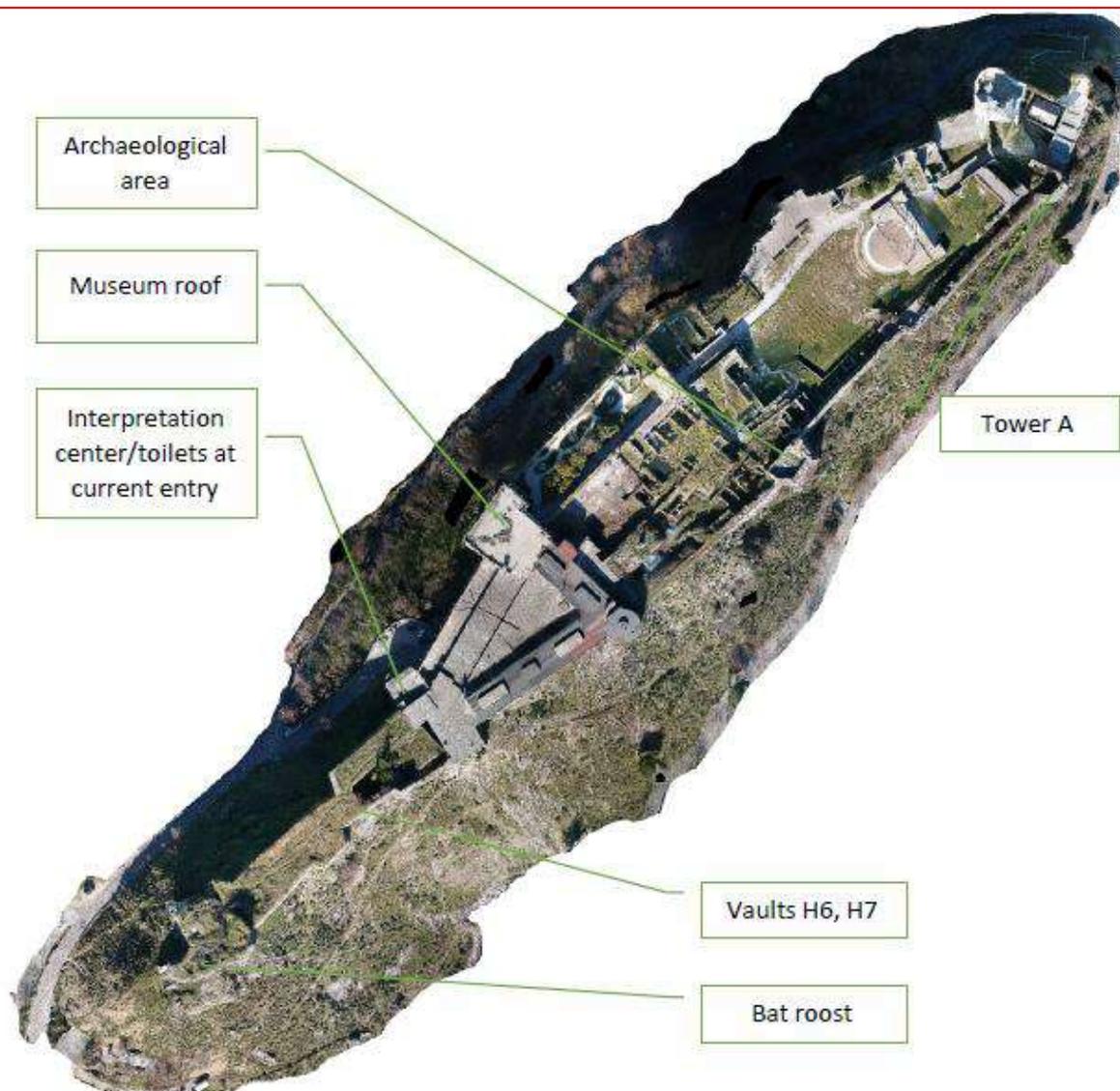


**“IDENTIFICATION, DESIGN OR PRIORITIZED MEASURES TO
ADDRESS SAFETY CONCERNS AND PREVENT LOSS OF
HERITAGE STRUCTURES IN THE CASTLE OF GJIROKASTRA”**

CULTURAL HERITAGE MANAGEMENT PLAN



**Proskene Cultural Heritage & Conservation (Proskene)
&
Cultural Heritage without Borders**

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LIST OF ABBREVIATIONS

ADF	ALBANIAN DEVELOPMENT FUND
CHMP	CULTURE HERITAGE MANAGEMENT PLAN
CHS	COMMUNITY HEALTH AND SAFETY
EBRD	EUROPEAN BANK FOR RECONSTRUCTION AND DEVELOPMENT
EPRP	EMERGENCY PREPAREDNESS AND RESPONSE PLAN.
ESIA	ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT
ESMP	ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN
GIS	GEOGRAPHIC INFORMATION SYSTEM
GoA	GOVERNMENT OF ALBANIA
MIE	MINISTRY OF INFRASTRUCTURE AND ENERGY
MoC	MINISTRY OF CULTURE
MTE	MINISTRY OF TOURISM AND ENVIRONMENT
NAPA	NATIONAL AGENCY OF PROTECTED AREA
NCA	NATIONAL CADASTRE AGENCY
NEA	NATIONAL ENVIRONMENTAL AGENCY
PIUTD	PROJECT FOR INTEGRATED URBAN AND TOURISM DEVELOPMENT
PPE	PERSONAL PROTECTION EQUIPMENT
RDNH	REGIONAL DIRECTORATE OF NATIONAL HERITAGE
RED	REGIONAL ENVIRONMENTAL DIRECTORATE
SEP	STAKEHOLDER ENGAGEMENT PLAN
WB	WORLD BANK

GLOSSARY OF TERMS

Archaeological Contractor	The Archaeological Contractor is the organisation contracted to be responsible for a variety of cultural heritage responsibilities.
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.
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 intervention to address safety concerns and prevent loss of heritage structures in the castle of Gjirokastra”
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.

1. INTRODUCTION

Gjirokastra, and its castle, is a unique place. Inscribed on the World Heritage List in 2005, this city “bears outstanding testimony to the diversity of urban societies in the Balkans and longstanding ways of life which have today almost vanished” and “the town planning and housing of Gjirokastra are those of a citadel town”.

The fortress is an old stonework construction situated along the ridge of a high cliff. The narrow building has a circumference of 1,400 paces and stretches from east to west, with a length of 600 broad paces and a width of 100 paces. Its long, solid ramparts resemble a galley. Inside the fortress there is only one main street running from east to west. Ranged on both sides of the street are 200 two storey stonework houses, roofed entirely with slate. Within the fortress is the Mosque of Sultan Bayazid II the Saint, with a slate roof and a stone minaret. It is a large old mosque with a spiritual atmosphere and is 80 feet long and 40 feet wide. Inside it there are four carved columns and a wooden ceiling of joined beams with very fine decoration.

A vision for the future of the castle, its uses, visitation, and conservation is sorely needed. This current project, understandably, is focused on the short-term emergency structural and geological interventions required for stabilization. But, this scope is insufficient without an exploration of how residents and visitors view and wish to use the castle. This project is to specifically address the fortifications given their significance, prominence as an attraction, and current poor condition. The Ministry of Culture and the Municipality of Gjirokastra, have explicitly requested support given the emergency situation and stability of the castle. Main elements of this proposal are:

- Structural stabilization of rock and bastion
- Opening sections in the south section of the castle
- Installing infra-red cameras and portable screen for viewing and understanding life of bats
- Restoring roof over Museum and prison
- Establishing new ticket office including accessible toilettes and small interpretation center
- Conservation of number of spaces which then can be utilized for new functions
- Fencing off instable and unexcavated archeological sections
- Additional archeological excavations in one section

Given the current state of condition, this project is primarily focused on the short term, but there must also be the pursuit of medium-term objectives to support longer-term goals, which in turn are used to pursue the vision. Such management plan can organize efforts, identify risks, schedule projects, and, importantly, seek additional sources of sustainable funding for continued conservation and maintenance. A monument visited and used will become a placed loved and thus preserved.

Given that, the restoration proposals have been compiled in fully accordance with the Albanian laws on Cultural Heritage, World Bank Operational Policy OP 4.11 (Physical Cultural Resources) and International charters (i.e. UNESCO, EU) and will follow all the procedures of approvals and monitoring of the works as foreseen in the laws.

1.1 Scope of this Cultural Heritage Management Plan

The Cultural Heritage Management Plan (CHMP) scope is to avoid possible damages or negative impacts to the Gjirokastra Castle's Cultural Heritage immovable and movable objects that are affected directly or indirectly by the project of "Identification, design or prioritized measures to address safety concerns and prevent loss of heritage structures in the castle of Gjirokastra".

1.2 Purpose of this Cultural Heritage Management Plan

This Cultural Heritage Management Plan:

- Outlines the key policies, legislation and standards relating to heritage management;
- Defines roles and responsibilities
- Outlines actions and measures necessary for the effective management of risks and impacts to cultural heritage;
- Covers the management of both moveable and immovable cultural heritage
- Details specific control measures to be implemented by ADF and its contractors (and subcontractors)

In doing so, this CHMP defines the actions and measures necessary for the overall management of cultural heritage during the project construction phase for both the Project beneficiaries and contractors in line with the applicable law and other obligations.

The CHMP will take into account other development project within the project area that conduct activities on the local cultural heritage and will coordinative cooperate and manage its activities for this project with other similar projects,

as to avoid losses of cultural heritage and financial losses usually resulting from discoordination

1.3 Objectives of this Cultural Heritage Management Plan

1. To avoid damages or alteration of the authentic elements or materials of Gjirokastra Castle during intervention to address safety concerns and prevent loss of heritage structures in the castle.
2. When avoidance is not possible to achieve, follow all the requirements as per Albanian laws and regulations, World Bank Operational Policy OP 4.11 (Physical Cultural Resources) but also International Charters, including UNESCO-s resolutions on Cultural Heritage.
3. Keep informed the local community and work closely with the local responsible institutions as to avoid possible complaints related to impacts to culture heritage assets.
4. Define roles and responsibilities for the implementation of the CHMP.

2. KEY POLICIES AND LEGISLATION

2.1. National policies and Legislation

Law No. 27/2018, dated 17.05.2018 “On Cultural Heritage and Museums” is the primary legal framework governing the management of tangible and intangible cultural heritage in Albania. The Law aims to promulgate and protect the cultural heritage in the territory of the Republic of Albania.

This Law, in relation to the field of territorial planning and development, defines inter alia:

- the cases of construction in public or private properties, which must obtain written approval from the National Council of Material Cultural Heritage and the National Council of Archaeology;
- cases of excavations, restorations, uses and any other action in the cultural monuments, as well as any alteration on the ground under their protection, to be done with the authorization of the National Council of Material Cultural Heritage, Archaeological Institute, Archaeological Service Agency;
- the rules and types of constructional interventions in the Museum Areas, museum ensembles, historical centers, monuments of culture, archaeological parks.

According to the law:

- The state ensures cultural heritage preservation, safeguarding, assessment and management pursuant to provisions laid down hereunder and in the legislation in force.
- Central state authorities and local self-government units coordinate the work, and correlate, approximate and integrate activities with the ultimate goal to ensure cultural heritage preservation, safeguarding, assessment and management, and to provide the conditions for its public accessibility.
- The state adopts measures for cultural heritage preservation from natural disasters and armed conflicts.

Pursuant to Article 42 of the Law, Immovable cultural heritage safeguarding in the context of territory planning and development Immovable cultural heritage safeguarding in the context of territory planning and development shall include:

- a) preservation regimes pursuant the provisions of this law;
- b) detailed plans in national significance heritage sites, aimed at preserving immovable cultural properties, and relevant specific rules;
- c) immovable cultural property management plans;
- d) general review of development permits and relevant documentation for projects, project investment initiatives, and intervention projects in protected areas, with the aim of preserving immovable cultural heritage and supervising their implementation.

In addition, following is a list of the key additional Albanian legislation related to cultural heritage:

Law No. 9490, dated 13.3.2006 “On the ratification of the Convention for the Safeguarding of the Intangible Cultural Heritage”

Law No.9806, dated 17.9.2007 “On the Accession of the Republic of Albania to the European Convention “On the Protection of the Archaeological Heritage” (revised)

Decision of Council of Ministers No. 625, dated 04.09.2019 “On the approval of the rules of administration of cultural assets and the functioning of legal entities in order to evaluate and revitalize cultural assets”.

National Permits required (related to Cultural Heritage preservation)

- Approval of the restoration proposals by the National Council of the Tangible Cultural heritage
- Approval of the Institute of Cultural Monuments.

3. KEY ROLES AND RESPONSIBILITIES

An integrated approach to cultural heritage management involves a range of stakeholders: ADF, Contractor, local authorities of Gjirokastra Municipality, regulatory agencies (RDNH - Regional Directorate of National Heritage, Gjirokaster) and the public. Effective cultural heritage management therefore requires robust processes regarding information dissemination, training, designation of responsibility, management actions, monitoring, control, and remedial actions. An initial delegation of activities between key stakeholders is shown in Table 1 below:

Table 1. Initial Delegation of Activities

Activities	ADF	RDNH of Gjirokaster	Municipality	Contractor
Planning	X	X	X	
Dissemination of information	X	X	X	X
Management of cultural heritage impacts	X	X	X	X
Chance finds implementation	X	X		X
Professional training	X	X		
Monitoring and control	X	X	X	X
Corrective actions	X	X	X	X
Management of cooperation	X	X		

3.1. ADF/PIU Role and responsibilities

1. Approval of this Cultural Heritage Management Plan and of the resources for implementation
2. Coordinate the process of obtaining permits before the start of the implementation works
3. Assist the contractor in communication with Institutions.

4. Keep the community informed during all the processes of the project

3.2. Municipality Role and responsibilities

1. Follow the implementation works and assure the works are implemented as per approved projects

3.3. Ministry of Culture and subordinate institutes

Subordinate institutes: National Institute of Cultural Heritage (NICH), National Center for the Inventory of Cultural Assets (NCICA), Regional Directorate of National Heritage (RDNH), National UNESCO representatives.

1. Approve the project and the procedures to follow
2. Supervise the implementation of stabilization works and assure that all works are implemented as per the approved project

3.4. Contractor

Contractor should demonstrate the ability to implement such projects and to be able to follow all the requirements of this plan. Contractor will be the only responsible body even in the cases when he subcontracts other companies. The contractor is required to conduct also monitoring of their sub-contractors.

Contractor is responsible for following the provisions of this Plan:

1. Read carefully the project and follow it rigorously. In case of new findings or changes that might consider necessary inform and consult the supervisor, the Client, Municipality and Regional Directorate of Cultural Heritage.
2. Understand cultural heritage issues / concerns and specific customs or requirements related to particular sites
3. Engage in the project people that are trained and have experience in such type of specific works.
4. Provide cultural heritage awareness training to staff with the potential to encounter tangible or intangible cultural heritage resources during their day-to-day activities. This training shall be provided as part of general site induction training.
5. Provide specific cultural heritage training for subcontractors.

6. Identify and report potential chance finds to Contractor's Licensed Cultural Heritage Specialist/Archaeologist and RDNH.
7. Regularly communicate planned construction activities to ADF's Environmental Lead to allow for cultural heritage monitoring activities.

4. MANAGEMENT MEASURES

A range of management actions (and other mitigation measures) are required to be implemented in respect of cultural heritage management. Table 3 describes the overall approach and principles associated with Heritage Management during the Project. The management measures are based on the mitigation measures compiled from the relevant requirements of the Project Approval as well as the legal requirements and standards.

Table 2: Heritage Measures

<i>Item</i>	<i>Action</i>	<i>Timing</i>	<i>Responsibility</i>
	Staff Awareness		
HM1	<p>All site staff, including subcontractors must attend an induction which details about Gjirokastra Castle heritage site and project requirements. The site will be further communicated in toolbox talks, prestart briefings and prior to works.</p> <p>Content will include site identification, materials likely to be uncovered, and requirement to notify the Environmental Manager in the event that any potential object of archaeological or Personnel directly involved in implementing heritage control measures on site will be given specific training in the various measures to be implemented.</p> <p>Records of all training are to be filed in accordance with the project filing system.</p>	<i>Pre-Construction</i>	<i>All staff</i>
	Site Planning		
HM2	A full photographic record of the entire Project must be undertaken prior to construction commencing to record the setting and context of the site as a whole prior to any impact on cultural/archaeological heritage	<i>Prior to construction</i>	<i>Design team</i>
HM3	Archival recordings shall be completed for all structures on the site prior to the commencement of construction	<i>Prior to construction</i>	<i>Environment Manager and Heritage consultant</i>
HM4	Prior to demolition of any structures, the heritage interpretation specialist must attend site with the contractor to detail what elements of the structures must be retained and how these must be cared for prior to installation for heritage interpretation.	<i>Prior to construction</i>	<i>Principal</i>
HM5	Plan construction activities to ensure that they remain within the construction boundary	<i>Prior to construction</i>	<i>Construction Manager</i>
HM6	Environmental control maps will be developed clearly identifying special heritage sites on and in close proximity to the Project.	<i>Prior to construction</i>	<i>Environment Manager</i>
	A Salvage Strategy will be prepared by the heritage specialist, in consultation with appropriate experts where necessary, including materials engineers, conservators and structural engineers,	<i>Prior to commencement</i>	<i>Principal</i>

Item	Action	Timing	Responsibility
HM7	to identify appropriate elements for salvage, storage, and potential reuse at the site, and provide a methodology for safely undertaking the salvage prior to the commencement of the demolition works. A final schedule of salvaged elements will be prepared following the completion of demolition.	<i>nt of salvage of heritage structures</i>	
	Exclusion Zones and Monitoring		
HM8	High visibility protective fencing will be installed around the sites and structures within proximity to the construction works under the guidance of an appropriately qualified heritage consultant.	<i>Prior to or during Construction</i>	<i>Site Supervisor Heritage Consultant,</i>
HM9	An archaeological monitoring plan (AMP) will be developed prior to the commencement of the construction works. The AMP will be developed in accordance with this Plan and submitted to the Ministry of Culture prior to commencement of construction. The archaeologist would assess the likely significance of any archaeological deposits encountered, and provide advice regarding appropriate further action.	<i>Prior to or during Construction</i>	<i>Environment Manager and Heritage Consultant</i>
HM10	No access through fenced heritage sites. These are considered exclusion zones.	<i>All times</i>	<i>All staff</i>
HM11	No works outside the Project construction boundary.	<i>All times</i>	<i>All staff</i>
HM12	Environment Manager to undertake weekly inspections and monitoring of construction activities to ensure compliance and conformance with the requirements of this plan. Site supervisor to undertake daily inspections and undertake maintenance of fencing where required. Records of inspections will be maintained.	<i>Daily/Weekly</i>	<i>Environment Manager and Site Supervisor</i>
HM13	Vibration monitoring will be undertaken at the Castle in close proximity to specific works which are not to be removed as part of the Project. As outlined in the ESMP, impacts to heritage structures are not expected (refer the Noise and Vibration Impact Assessment), such that detailed options for any alteration of construction methodology will be evaluated and implemented on a case-by-case basis and if specific circumstances arise that deem it necessary. Vibratory monitoring will be undertaken as summarised above to ensure levels are measured during the actual activity and compliance achieved	<i>Ongoing during construction</i>	<i>Environment Manager and Site Supervisor</i>

<i>Item</i>	<i>Action</i>	<i>Timing</i>	<i>Responsibility</i>
	<p>The sensitive structures criteria may not apply to all heritage structures.</p> <p>Where vibration goals have been exceeded, works will cease and alternative construction methodologies will be investigated. Alternative construction methodologies will be dependent upon the cause of vibration. Examples include:</p> <ul style="list-style-type: none"> • Static rolling rather than vibratory rolling • Reducing intensity of vibration • Use of alternative equipment such as multi-tyred rollers, pad-foot rollers, munchers rather than pneumatic drills or reducing size of equipment • Selection of materials which require less compaction. <p>These options will be implemented where reasonable and feasible.</p>		
HM14	<p>Some forms of pollution can be damaging to stone architecture. If the 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. The CLO will ensure that all stakeholders are consulted prior to any sites being covered.</p> <p>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</p>	<i>Ongoing during construction</i>	<i>Environment Manager and Site Supervisor</i>
HM15	Exclusion fencing (temporary fencing) is to be installed around instable and unexcavated archeological sections.	<i>During construction</i>	<i>Environmental Manager</i>
HM16	Archaeological surveys directed by a qualified archaeologist will be undertaken for any construction area not included within the Project. Additional management measures will be prepared in consultation with stakeholders if required.	<i>During construction</i>	<i>Environment Manager</i>
	Procedures for Unexpected Finds		

<i>Item</i>	<i>Action</i>	<i>Timing</i>	<i>Responsibility</i>
HM17	If an item (or suspected item) of heritage is discovered, the <i>Unexpected Heritage Finds Procedure</i> will be implemented. All work in the area of the find will cease immediately, the heritage value of the find will be assessed including a determination as to whether the impacts are consistent with those identified within the Gjirokastra Castle, mitigation measures will be developed to minimise the impacts, and additional approvals, where required, will be obtained. Works will not recommence until the above has been undertaken by the project archaeologist.	<i>Ongoing during construction</i>	<i>All staff</i>
	Incident Management		
HM18	Incidents include breach of an exclusion zone, damage to artefact, or unexpected find. All incidents must be notified to the environment teams immediately. Works in the vicinity of the incident will be stopped as per the unexpected finds procedure.	<i>Ongoing during construction</i>	<i>All staff</i>
	Reports and Records		
HM19	Meeting minutes will be kept for meetings with regulatory bodies such as the ADF, WB, UNESCO representatives, etc.	<i>Ongoing during construction</i>	<i>Environment Manager</i>
	A summary of compliance with this procedure will be provided in the Project Monthly Report	<i>Ongoing during construction</i>	<i>Environment Manager</i>
HM20	Post-Construction Works		
HM21	Undertake a reassessment of the heritage value of the site upon completion of the works in consultation with Regional Directorate of National Heritage, Gjirokastra City Council and the Institute of Cultural Monuments.	<i>Post construction</i>	<i>Castle Principal</i>

4.1. Heritage Awareness Training

All relevant personnel and contractors involved in the Project will be advised of the relevant heritage considerations, legislative requirements and recommendations in the Heritage Impact Assessment.

A cultural awareness training programme will be undertaken for all personnel involved with ground breaking activities for the Project will include the following:

- Information on the archaeological and cultural heritage values of the Project area
- Awareness of their obligations to minimise impacts to Cultural heritage under the Law “On Cultural Heritage and Museums”
- Outline of the location and type of archaeological sites within the Project area including instructions not to disturb these sites
- Provide clear information about statutory obligations for heritage. It is important to note that failure to report a discovery and those responsible for the damage or destruction occasioned by unauthorised removal or alteration to a site or to archaeological material may be prosecuted.
- Provide training on how to identify archaeological artefacts
- Stop works and reporting protocols for discovery of previously unknown heritage and archaeological items
- Examples of items that may be expected on the site

All training and tool box meetings will be recorded. All project documentation, including environmental compliance, conformance and training records, will be kept as objective evidence of compliance and conformance with environmental requirements and filed in accordance with the Project filing system.

4.2. Chance Finds reporting

Should a Chance Find be discovered, the Cultural Heritage Coordinator (from the contractor) will complete a Chance Find Report to be submitted to the dedicated representative of the Regional Directorate of National Heritage. This report must contain the following information:

- date and time of the discovery;
- location of the discovery (GPS coordinates);
- description of the discovery;
- significance of the discovery;
- estimated weight and dimensions;
- estimated time needed to conduct excavation of discovery;

- recommendation on how to proceed;
- temporary protection measures implemented

The RDNH shall decide action to be taken with respect to the Chance Find, in cooperation with the Institute of Culture Monuments and Institute of Archaeology and Contractor.

4.3. Chance Finds documentation

Contractor will be required to maintain separate records of monitoring activities, Chance Finds, and Chance Find response measures executed. 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 RDNH 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.

5. COMPLIANCE MANAGEMENT

5.1. Contractor Role and Responsibility

Relevant roles and responsibilities associated with this CHMP are presented in Table 3. All personnel are responsible for ensuring that heritage items are protected.

It is important to note that failure to report a discovery and those responsible for the damage or destruction occasioned by unauthorised removal or alteration to a site or to archaeological material may be prosecuted.

Table 4. Contractors Roles and Responsibilities

Roles	Responsibilities
Construction Manager	<p>Ensure that sufficient resources are allocated for the implementation of this CHMP</p> <p>Ensure that the outcomes of the visual checks/ compliance and conformance construction monitoring/ incident reporting are systematically evaluated as part of ongoing management of construction activities</p> <p>Ensure audits of construction site records/ monitoring records/ incident reports are undertaken on a monthly basis, findings are shared with relevant site personnel and corrective actions are implemented</p>
Environment Manager	<p>Oversee the overall implementation of this CHMP</p> <p>Ensure all relevant personnel have and understand the most up-to-date copy of this CHMP</p> <p>Ensure that any required actions arising from the detection of unexpected heritage items is reported to the relevant personnel for further action and ensure that the actions are effectively implemented</p> <p>Ensure all monitoring reporting requirements are met and maintained on site</p>
Site supervisors contractors/ subcontractor	<p>Understand and implement mitigation protocols as required in the CHMP and any other required measures during construction</p> <p>Undertake relevant training to implement the requirements of this CHMP</p> <p>All personnel are responsible for ensuring that the clearing limits are addressed and heritage items are protected.</p> <p>All site personnel to undertake toolbox talks in relation to the reporting process for unexpected finds.</p>
Qualified heritage professional (archaeologist)	<p>The archaeologist will be responsible for providing advice to minimise potential impacts to historic heritage values that may be recorded during the construction activities.</p>

5.2. Monitoring, Auditing and Reporting

Monitoring, auditing and reporting will be undertaken in accordance with the ESMP, as well as additional requirements listed below.

The Environment Manager will undertake weekly inspections and monitoring of construction activities to ensure effectiveness of controls, compliance and conformance with the requirements of this plan.

Items that require action will be documented on the site environmental inspection. The Construction Manager will be responsible for providing appropriate resources in terms of labour, plant and equipment to enable the items to be rectified in the nominated timeframes.

Daily inspections of controls will be made by Supervisors and maintenance will be recorded in site diaries during active site works.

5.3. Review and Improvement

Continuous improvement of this plan will be achieved by the ongoing evaluation of environmental management performance against regulatory environmental policies, legislative requirements, Project objectives and targets for the purpose of identifying opportunities for improvement.

The continuous improvement process will be designed to:

- ❑ Identify areas of opportunity for improvement of management and performance of Cultural Heritage
- ❑ Determine the cause or causes of non-conformances and deficiencies
- ❑ Develop and implement a plan of corrective and preventative action to address any non- conformances and deficiencies
- ❑ Verify the effectiveness of the corrective and preventative actions
- ❑ Document any changes in procedures resulting from process improvement
- ❑ Make comparisons with objectives

This plan will be reviewed semi-annually as a minimum but may be updated more regularly depending on process changes and refinements or where an incident related to heritage manage requires the plan to be reviewed.