INTERNATIONAL NETWORK FOR CULTURAL DIVERSITY
(INCD)

Cultural Impact Assessment Project

FRAMEWORK FOR CULTURAL IMPACT ASSESSMENT

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I-   BACKGROUND AND CONTEXT

The idea to initiate the formulation of a framework for assessing the cultural impact of development policies and projects came out of the INCD third annual meeting held in Cape Town (South Africa) in October 11-13, 2002.

The primary objective is to outline a framework that will assist development agencies and private interests in fulfilling their obligations towards the affected communities of their policies and projects, and in so doing respect, preserve and promote cultural diversity and identity.

According to the International Association for Impact Assessment (IAIA), impact assessment simply defined, "is the process of identifying the future consequences of a current or proposed action".

Impact assessment as a standard development practice, gained international attention and recognition as a result of the activities of two international bodies. In 1980, during the special session on integrated impact assessment at a meeting of the American Association for the Advancement of Science (AAAS), the formulation of a new organization was discussed. It would combine the interests of environmental impact assessment, social impact assessment, technology assessment, risk assessment and related fields. A working party was convened to advance the proposal and the International Association for Impact Assessment was inaugurated as an international non-governmental organization.

At the 1992 United Nations Summit on Environment and Development, otherwise known as the Earth Summit held in Rio (Brazil), the notion of environmental impact assessment gained further international attention as a critical tool for enhancing sustained development. Since then, governments were required to formulate National Environmental Policies, establish National Environmental Agencies and elaborate National Environmental Action Plans to provide strategic dimensions for the respective countries in their efforts to address development issues with environmental consequences. The provision of required enabling legislations, institutional and policy frameworks for environmental issues, provided the basis for governments to require development agencies to prepare environmental impact statements (EIS) before undertaking actions that may significantly affect the quality of the human environment.

Preparing an Environmental Impact Statement requires the integrated use of the natural and social sciences and the humanities. For example addressing the social components of the Environment Impact Assessment has gradually led to the development of sound principles and guidelines on social impact assessment (SIA). An internationally-applied SIA guidelines was prepared by an Inter-organizational committee established by the United States Department of Commerce in May 1994.

The EIS guidelines has adopted both social and cultural variables among others to guide its investigations. While some EIS's distinguish social variables from cultural variables, some subsume cultural variables under the broader social variables and treat culture as part of the social dimensions of environmental impact assessment, on the assumption that social impact assessment will adequately cover cultural issues and concerns.

The fact of the matter is that neither the cultural or social aspects of the EIS, nor the independent will of the cultural community has led to the development of similar international principles and guidelines for cultural impact assessment. A separate set of principles and guidelines that could provide common standards for addressing the cultural concerns of communities in a broad-based, holistic and participatory manner is what is required.

What is cultural impact assessment? What is its purpose or aim? Why has its development lagged behind other forms of impact assessment? What sort of principles and guidelines can be proposed to assess the cultural impact of development policies and actions? What efforts have or are being made to address cultural impact assessment issues at the national and international levels?

The term "cultural impact" refers to the consequences to human populations of any public or private policies and actions that significantly change their norms, values, beliefs, practices, institutions as well as the way they live, work, socialize and organize themselves as part of their cultural life.

Assessing the cultural impact of policies and actions on the human environment is not an entirely new phenomenon, as several agencies have already developed cultural impact assessment guidelines as part of their project evaluation frameworks.

However, as these agency-driven guidelines are tailor-made and custom-designed to suit the needs of the agencies concerned, there are remarkable

variations in approaches and experiences on how the cultural impact of projects is to be assessed. There is therefore, up to now, no systematic interdisciplinary statement from the cultural community as to what the content of cultural impact assessment should be like.

In view of the multiplicity of approaches and experiences in carrying out cultural impact assessment, there is the need to develop common standards and guidelines. That way systematic and consistent regimes of the cultural impact assessment process could be developed to reduce biases and abuses of the system. For instance, it is undesirable to have culturally-damaging activities being encouraged to concentrate in those countries with the weakest standards of preserving and promoting cultural heritage, and at least a basic minimum agreed common standard and a view about good practise, would help reduce this problem.

There is so far no internationally negotiated and acceptable definition of cultural impact assessment. However, as there are a variety of approaches and experiences in cultural impact assessment, it is worth beginning with a basic definition of what it is meant, so that the terms used in this text are clear. For the purpose of this study, cultural impact assessment is defined as :

> A process of identifying, predicting, evaluating and communicating the probable effects of a current or proposed development policy or action on the cultural life, institutions and resources of communities, then integrating the findings and conclusions into the planning and decision making process, with a view to mitigating adverse impacts and enhancing positive outcomes.

It could be deduced from the above definition that cultural impact assessment is predicated on the notion that decision makers should understand the consequences of their decisions before they act, and that the affected people will not only be appraised of the effects, but have the opportunity to participate in designing their future.

The goal therefore for undertaking this task is to enhance the preservation and promotion of the cultural diversity of affected communities with a view to ensuring the sustainability of development actions and policies. In this way it provides planners and decision makers with better information about the consequences which development actions and policies could have on the cultural environment, although it cannot of itself achieve that protection.

The approach is characterised by its multidisciplinary, systematic and predictive nature and in its better form involves :
⇒   Reviewing the existing state of the cultural environment and the characteristics of the proposed action and possible alternative actions ;

⇒ Predicting the state of the future cultural environment with and without the action (the difference between the two is the action's impact) ;

⇒ Considering methods for avoiding, eliminating or reducing any adverse impacts, and possible compensation for them ;

⇒ Preparing a cultural impact statement or cultural assessment report which discusses the issues, and is used to inform and influence decision-making ; and

⇒ After a decision is made about whether/how the action should proceed, monitoring the impacts which do occur, and acting on the results of such monitoring.

Apart from informing the authority responsible for approving projects about foreseeable cultural consequences of policies or projects, cultural impact assessment has or should have an important function in ascertaining whether policies or projects will conform to other international standard-setting instruments on culture such as the 2001 UNESCO Universal Declaration on Cultural Diversity, the Action Plan of the 1998 Stockholm Intergovernmental Conference on Cultural Policies for Development, the 2002 Istanbul Declaration on the Intangible Cultural Heritage, etc.....

As a result of the publication of well-researched technical analyses of the significance of cultural factors in development efforts, coupled with active lobbying by a variety of research communities, a new recognition of the cultural basis and impact of development emerged. However, considered as a whole, there is still on the one hand, an almost total lack of established routines and on the other, a noticeable sceptism in development cooperation institutions as to the value of adopting more professional and standard approach to the cultural basis of development. At the sametime one can observe that the formulation of development cooperation goals and principles now underscore the fundamental role of cultural factors in recipient countries in the way development assistance is designed.

The above considerations notwithstanding, local communities face critical problems when it comes to the implementation of projects. More often than not, their participation in project that directly affect them is seriously curtailed. They are rarely actively involved in the project from the design stage through to evaluation. Rather, they are merely informed and their concerns, even if genuine, are hardly taken on board.

In the case of large infrastructural projects such as road construction, large scale multinational logging and dam constructions, because of the controversies involved, especially as it affects the local communities, the attitude of governments, the donor agency and the multinational contracting

companies is one of benign neglect. It is out of such cultural concerns of the communities among others, that the need for cultural impact assessment arose. The following examples with illustrate the point.

**Box I : Cultural challenges to road planning,
design and construction in Bali (Indonesia)**

The challenge to construct new roads in developing countries with the intensity of land development and dense settlement patterns, coupled with the significance of cultural sites, is extremely difficult. Added to the engineering challenges is the requirement to document the proposed development under environmental impact assessment legislation, the regulations of the country and the environmental guidelines and directives of the donor agency.

This was the case for a recently completed study in Indonesia. The study involved the feasibility of ten proposed new roads for the urban area of Denspasar, the capital of the province of Bali, a place with a worldwide reputation as an exotic tourist destination that attracts several thousand tourists per year, and hence the need for an effective and efficient road transport network.

The main challenge for road design and construction in Bali is the Balinese concept of spatial orientation. Since most of the ten proposed new roads were to cross the existing infrastructure, they potentially created significant impacts on the integrity of the villages, the severing of access to the temples and the loss of housing and forced relocation of the residents. Moreover, there is no mitigation or compensation that is acceptable to the villagers and they must be involved in any decision making and vote in agreement as to the roads impact on the community.

Whereas new roads and improvement to the existing road infrastructure are desperately required to meet the growing number of vehicles and the movement of tourists that contribute substantially to the foreign exchange of Indonesia, but accommodating the cultural needs of the Balinese makes road design and construction a unique challenge.

Source: ND Lea International Ltd, Vancouver, B.C. Canada.

Box II: Cultural Challenges to Multinational logging:
The Case of the Saramacca Maroons

The rainforests in the world's tropical regions are the sources of the cultural and biological diversity of local communities living nearby. They tap the rainforest as a means of subsistence, to meet their spiritual and emotional needs and as sources of the diverse medicinal and nutritional plant species they require.

However, these forests are frequently threatened by development projects or concessions offered to other international companies by their governments for logging purposes. Sometimes, big pharmaceutical companies from developed countries tap these forests as the source of medicinal plants which are later developed in distant laboratories into drugs that they later sell back to the very countries the plants were obtained from.

The world forest movement documented the plight of the Saramacca Maroons in Suriname in the fight to preserve their ancestral lands including the forests they have relied on for generations, from wanton exploitation by multinational corporations.

Presently, all land in the interior of the country (approximately 80%) is classified as state land and indigenous peoples and Maroons are considered to be permissive occupiers of state land without rights or title there to. If their subsistence activities conflict with logging or mining operations, the latter takes precedence as a matter of law. Furthermore, Suriname Law does not provide any mechanism for consulting with the communities about the granting of concessions on or near their territories.

International human rights standards provide that indigenous peoples and Maroons have the right to participate fully in decisions before they are taken, and about whether concessions are granted on their lands. Their rights include the right to information concerning the proposed activities, companies involved and the nature of risks posed by the activity.

Source: Forest Peoples Program of the World Rain Forest Movement.
     http://www.wrm.org

Box III : Cultural challenges to Dam Construction in Turkey

The construction of a dam is always part of broader socio-economic development projects designed to provide hydro-electric power or to provide more cultivable land through irrigation. However, dam construction is without controversies as it disrupts the pattern of living of the local communities living around the site of the proposed dam or destroys underground archaeological remains and even relics and monuments.

The plan to construct a dam at Ilisu on the River Tigris is part of a large scale project for the socio-economic development of SE Anatolia. However, much of the archaeological heritage in the uppervalley of the Tigris and Euphrates and of their tributaries has not yet been investigated. Preliminary investigations have been made but the majority of the sites remain to be studied (excavated, inventorised, published).

The dam projects have however led to far greater attention over recent years and this attention in turn generated welcome possibilities for research.

Equally not much is known or documented of the traditional culture of the local population to be displaced by the construction of the dam. Kurdish settlements can be traced after a migration from western Persia around 2,500 years ago. Carpet weaving and the tradition of the Arab minority would equally be lost due to the underground archaeological heritage.

Source: Ilisu Engineering Group, Ankara, Turkey, April 2001

II – PRINCIPLES FOR CULTURAL IMPACT ASSESSMENT

The framework presented here is inspired by the basic structures of the environmental and social impact Assessment model as approved by the International Association for Impact Assessment. The model has however been adapted and further developed and improved upon with cultural elements and experiences, to enhance its suitability for assessing the cultural impact of development policies and projects.

Cultural Impact Assessment (CIA) is a method of analyzing what impact a development policy or action may have on the cultural aspects of the environment. These aspects include (but not limited to):

- the ways people cope with life through their economy, rural systems and values;

- the ways people use the natural environment for shelter, making livelihood, industry, worship, recreation, gathering together, etc;

- the ways communities are organized, and held together by their social and cultural institutions and beliefs;

- ways of life that communities value as expressions of their identity;

- art, music, dance, language, crafts, drama festivals and other expressive aspects of culture;

- a groups' values and beliefs about appropriate ways to live, family and extra-family relationships, status relationships, means of expression and other expressions of the community; and

- the aesthetic and cultural character of a community or neighbourhood-its ambience.

Cultural impact assessment involves characterizing the existing state of such aspects of the environment, forecasting how they may change if a given action or alternative is implemented, and developing means of mitigating changes that are likely to be adverse from the point of view of an affected population.

The following principles are benchmarks for conducting a cultural impact assessment : They include the :

1 – Public Involvement, Consultation and Participation

Since CIA is primarily concerned with determining and addressing the concerns of the public, public involvement is essential. In this respect, it is essential to determine who the affected segments of the public are, how they are organized and how their active participation could be assured.

2 – Analyze Impact Equity

A basic aspect of cultural impact assessment is to identify all groups likely to be affected by a development policy or action. There will always be winners and losers as the result of a decision to construct a dam, build a highway or undertake large scale timber logging (as in the examples shown in boxes: I-III). However, no category of persons, particularly those that might be considered more sensitive or vulnerable as a result of age, gender, ethnicity, race, impairment or disability, occupation or other factors, should have to bear the brunt of adverse cultural impacts. While there may be varying benefits for almost all to be affected by a proposed policy or action, the CIA has a special duty to identify those whose adverse impacts might get lost in the aggregate benefits. The impact equity analysis must be considered in close and sympathetic consultation with affected communities, neighbourhoods and groups, especially the poor, low-income and minority groups and indigenous communities.

3 – Focus the Assessment

Cultural impact assessment practitioners must contend with stringent time and resource constraints that affect the scope of the assessment and how much can be done in the time available. Given such constraints, a central question emerges: "If you cannot cover the cultural universe, what should you focus on?" The answer is to focus on the most significant impact in order of priority, and all significant impacts for all impacted groups must be identified early using a variety of rapid appraisal or other participatory enquiry techniques. Impacts identified by the public, through the use of participatory enquiry and involvement methods (focus groups discussions, participant-observation method, surveys, etc.) must be given high priority.

However CIA assessors must use their expertise and experience to prioritise issues. This may assist in identifying issues for further research, which might have been unrecognized by the public or the agencies.

4 – Identify Methods and Assumptions

The methods and assumptions used in cultural impact assessment should be made available and published prior to a decision in order to allow decision makers as well as the public to evaluate the assessment of impacts.

5 – Define significance

A cultural impact assessment should discuss how the significance of a cultural variable or an impact is represented. There are definitely reasons for regarding one variable as more significant than another in a given case; and these reasons should of necessity be made explicit.

6 – Provide Feedback to Project Planners

A CIA should not take the form of a basic research consultancy report, which could be drafted and delivered directly to the Contracting Agency without prior client involvement. There should be an active feedback process between the CIA Assessor and the Planning Agency throughout the assessment and planning process. That way, CIA results should feedback into project design to mitigate adverse impacts and enhance positive ones.

The CIA therefore should be designed as a dynamic process involving cycles of project design, assessment, redesign and reassessment. This process should be carefully carried out and coordinated informally with planners (project designers) so that they are adequately appraised of the potential problems and opportunities before it is too late to do anything about them. Equally important is the opportunity to be accorded the public for comments to the draft assessment report before its publication. This aspect can contribute immensely to the process of feedback and modification.

7 – Use Professionally Trained and Qualified CIA Practitioners

Trained Cultural Specialists using appropriate professional methods, will provide the best results. Generally speaking, such practitioners include anthropologists, archaeologists, ethnologists/ethnographers, cultural geographers, and members of related professions (e.g. sociology, social history, linguistics, musicology, etc.) may be effective cultural impact analysts if they have the right interest and training. Selecting a CIA practitioner requires a close look at both training and experience, and seeking a good "fit" between the analyst and the issues to be analysed.

8 – Establish Monitoring and Mitigation Programs

A CIA should not only provide the Agency with an analysis of impacts, but also the basis for setting up programs to mitigate cultural impact and monitor how these programs work.

Identifying a monitoring infrastructure is a key element of the local planning process. This should make monitoring and mitigation a joint agency and community responsibility. As few agencies seem to have the resources to continue these activities for an extended period, local communities when provided with the resources, could assume a part of the responsibility for monitoring and mitigation.

9 – Identify Data Sources

As a matter of good practice, a CIA should identify the sources of data and information upon which the analysis is based.

Three sources which should be consulted for any exercise are: Published Scientific literature, secondary data and primary data, although the balance among the three may vary according to the type of proposed action.

Published scientific literature including books, reports, journal articles from similar projects, would have normally summarised existing knowledge of impacts based on acceptable scientific standards.

Secondary Data including vital statistics, agency reports and routine data collected by government agencies.

Primary data sources would normally include survey research, oral histories, interview of key informants, etc.

10 – Plan for Gaps in data

No CIA collects all the required data. In such a situation, the CIA should honestly identify gaps in its data base information that probably exists but cannot be gathered, or questions and uncertainties about the data. In consultation with project planners, the CIA analyst should assess how critical the data are, and either develop strategies for obtaining them or establish ways to proceed towards a good decision without them.

III – LEGAL MANDATES AND ADMINISTRATIVE PROCEDURES

Legal Mandates

A cultural impact assessment does not take place in a vacuum. Apart from the fact that it is undertaken as a response to a particular situation, a proposed development action or policy change, it also has to be mandated by statutes or regulations already in place to provide authorisation for the exercise.

An examination of CIA exercises in most countries show that the National Environmental Act is the primary legal requirement for a cultural impact assessment. The CIA is therefore an investigation of the effects of development policy or action on the cultural aspects of the human environment.

This means that if there are no environmental effects of any kind, other than a social or cultural, an environmental impact statement will not be prepared, but an environmental assessment will be undertaken, which is expected to take note of other effects; social, cultural, economic, etc. A look at the enabling legislations of a few countries, providing the framework for CIA will illustrate the point.

Figure I: Statutes and legislations that mandate cultural impact assessment

Country	Legislation	Provision
USA	National Environmental Policy Act of 1969	Calls for the integrated use of the social sciences in assessing impacts on the human environment.
Hong Kong	- Environmental Impact Assessment ordinance - Antiquities and Monuments ordinance - Marine Archaeological Guidelines	Prescribes the approaches and standards required in investigating and assessing the impacts on the cultural heritage sites
New Zealand	- 1840 Treaty of Waitangi - Resource Management Act, 1991	- Granted settlement rights to the British but guaranteed the Maori, protection of their possessions for as long as they wished. - This is the mechanism under which the natural and physical resources of the New Zealand are to be managed.
Senegal	- Code de l'Environnement (Environment Law); loi n° 83-05 of 28/01/98 - Titre II du Code de l'Environnement (Prévention et lutte contre les pollutions et nuisances) - Plan d'Action de l'Environnement Nationale	- Requires the assessment of the environmental, social and cultural impacts of all projects executed in Senegal; - Requires the assessment of the impacts of all projects to ensure their environmental soundness. - Stipulates the guidelines and procedures for carrying out environmental, social and cultural impact assessment of projects.
South Africa	Section 38 (1) of the National Environmental Management Act	Requires that any party who intends to undertake a development activity, must

| | | | notify the responsible heritage resource authority and to furnish it will all necessary details. If the heritage resource authority believes that heritage resources will be affected by such development, it will require the developer to submit a **heritage assessment report**. |

Administrative Process

As CIA is intended to provide a form of full-disclosure procedure for decision makers to enable them consider the full implications of potential courses of action and the unintended as well as the intended, before the proposed development proceeds, certain administrative processes are expected to be observed. The following is an example of an administrative process that a CIA can go through. This is a guideline, describing a standard process but its observance depends upon national circumstances, hence varying in the degree and level of sophistication. It is based on a summary of common standards observed by selected countries for this study, obtained through an internet review.

1 – The National Cultural Agency prepares a ministerial memorandum/cabinet paper, identifying and defining those projects which will be subject (by law or cabinet order) to the CIA procedures;

2 – The National Cultural Agency sets out the basic CIA guidelines;

3 – The responsible Ministry sets out the CIA principles;

4 – The project proponent prepares the draft CIA;

5 – Notification, public inspection of project plans and draft CIA by the concerned local government authorities;

6 – The project proponent organizes briefing meetings with the concerned/affected groups or communities;

7 – Presentation of written comments from concerned members of the community;

8 – Views and comments of the concerned local government authority;

9 – Preparation of the final CIA by the project proponent;

10 – Notification and public inspection of the final CIA by the concerned local government authorities and representatives of the affected groups;

11 – Comments and observations of the National Cultural Agency Submitted directly to those who issue the license;

12 – Due consideration of these views taken in the processing of the license by the licensing Authority; and

13 – The issue of the license to the project proponent by the licensing Authority to undertake the proposed development activity.

14 – It is important to note that a CIA process is indispensable in the preservation and promotion of cultural diversity and community value systems for enhancing sustained development. Institutionalization of the

CIA by government requires legislation and complex administrative policies and regulations.

15 – The civil society and private sector should be involved in an active partnership with the public sector to ensure its application as a standard development practice.

IV – A CONCEPTUAL MODEL FOR COLLECTING AND EXAMINING DATA AND INFORMATION ON CULTURAL IMPACTS

The basic model presented here is inspired by similar models used for Environmental and Social impact assessment, although with differences in some of the key elements and their application. The model provides the framework for collecting and examining data on cultural impacts of development policy and actions.

Its principal elements include:
- determining the type of project or action for the assessment;
- identifying the cultural variables to be impacted upon;
- determining the stage in policy formulation or project cycle for which the impact is being assessed; and
- all the above three elements are arranged in the form of a matrix to facilitate the investigation and assessment of significant impacts.

IV.1 - Determine Project Type

Cultural impacts will vary according to the type of development. The range and variety of project types include the following, for which a CIA will normally involve a detailed technical description of the proposed development:
- Mineral extractions;
- Hazardous and Sanitary Waste Sites;
- Power plants;
- Reservoirs, including all water impoundment for flood control, hydropower, conservation and recreation, cooling lakes and diversion structures;
- Industrial plants;
- Land use designations, from timber production to wilderness designation to land fills;
- Military and governmental installations;
- Educational establishments / institutions;
- Transportation facilities;
- Linear developments including subways, railroads, powerlines, aqueducts, bike paths, bridges, pipelines, sewers, fences, walls and barrier channels, green belts and waterways (including canals);
- Designation of sacred sites;
- Parks and preserves, cemeteries and recreation areas;

- Housing facilities.

(**Source**: Digest of Environmental Impact Statements, The Information Resource Press, USA)

IV.2 - Identify Cultural Impact Assessment Variables

Cultural impact assessment variables point to measurable and qualitative changes in the cultural life, institutions, resources and infrastructure of human populations and communities, resulting from a development project or policy change.

On the basis of an examination of the cultural and socio-cultural impact assessment carried by certain agencies in selected countries, we are able to provide a tentative list of cultural variables under the following three general headings:

1 – Cultural Life;
2 – Cultural Institutions and Organizations; and
3 – Cultural Resources and Infrastructure

1 – Cultural Life refers to (but not limited to) the following:
- Verbal Expressions (Stories, Poetry, Languages)
- Musical Expressions (Song and Music)
- Expressions by Action (Dance, Plays, Rituals)
- Tangible Expressions (Paintings, Sculptures, Pottery, Woodwooks, Jewellery, Basket, Weaving, Textiles, Garments, Carpet, Musical Instruments and Handicrafts)
- Religions and Ritual Ceremonies
- Cultural Practices, Beliefs and Value Systems

2 – Cultural Institutions and Organizations refer to (but not limited to) the following:
- Political Structure and Forms of Organization
- Social Structures and Forms of Organization
- Social Networks
- Power Relations and Decision Making Structures

3 – Cultural Resources and Infrastructure refer to (but not limited to) the following:

- Indigenous knowledge Systems, Wisdom, Skills and Capacities
- Sacred Groves and Sites
- Places of Historic and Cultural Significance; including Monuments, Historic Sites, Schedules Antiquities, Museums, Art Galleries, Theatre Halls, Craft Centres, Recording Studies, etc.
- Important Historic and Cultural Documents and Texts
- Systems of Natural Resources Use including Land Tenure Systems
- Traditional Architecture

IV3 - Determine the Stage in Policy Development or Project cycle

All projects and policies go through a series of stages or steps, starting with conceptualisation/designing/planning, to implementation and construction, to monitoring and evaluation, to operations and maintenance. At some point the project might be abandoned or decommissioned, or official policy could change. Cultural impacts will be different for each stage. An investigation of the issues prior to the assessment may lead the assessor to focus only on one stage. Thus the specific stage in the life of the project or policy is an important aspect in determining impacts. Not all cultural impacts will occur at each stage.

1 – Planning/Policy Development

This stage refers to all activity that takes place from the conceptualisation of a project or policy to the point of construction activity or policy implementation.

We often assume that real impacts only begin to take place once physical activities start. However, community anxieties can be aroused and hopes and hostilities can begin to mount from the earliest point of an announcement of a policy or a proposed action, and intense lobbying could take place to secure interests, politicians manouvre for political influence or pressure groups and civil society movements could take up to the streets to pressure the proponents or policymakers to change decisions.

2 – Constructing / Implementation

This stage begins once a definitive decision is made to proceed with the project or policy and a permit is issued or a law or legislation takes effect.

For construction projects, this involves clearing land, building access roads, developing utilities, displacement and relocation of people if necessary.

The local communities pattern of living and networking could be affected, cultural resources and infrastructure could be destroyed with the intent that

"money can compensate for anything". Custodians of traditions are more interested on the impacts at this stage.

3 – Operation / Maintenance

This stage occurs after the construction is complete or the policy is implemented fully.

This is the stage that local communities would want to be assured of the long term benefits of the project or policy.

4 – Abandonment / Decommissioning

This stage is reached when the proposal is made that the project or policy and associated activities will cease at sometime in the future.

As in the planning stage, local community anxieties are aroused again, with the news of decommissioning or policy change. Loss of amenities or facilities or privileges and advantages enjoyed under a particular policy are major causes of renewed anger and hostilities.

Here the community's concern will be the provision of alternatives or compensation for the loss of assess and benefits.

IV.4 - Construct a Matrix for relating CIA Variables to Policy / Project Type and Stage

Cultural impact assessment specialists must construct a matrix to direct their investigation of potentially significant cultural impacts. For each project / policy stage, the assessor should identify potential impacts on each cultural variable identified in the matrix. This ensures that no critical areas are overlooked.

Figure II: Matrix Relating Project Stage to Cultural Impact Assessment Variables

Cultural Impact Assessment Variable	Planning/Policy Development	Implementation / Construction	Operation/ Maintenance	Decommissioning / Abandonment

Cultural Life - Verbal Expressions - Musical Expressions - Expressions by Action - Tangible Expression - Religious, Festivals and Ritual Ceremonies - Cultural Practices, Beliefs and Value Systems				
Cultural Institutions and organizations - Political Structure and Forms of Organization - Social Structures and Forms of Organization - Social Networks - Power Relations and Decision Making Structures				
Cultural Resources and Infrastructure - Indigenous knowledge Systems, Wisdom, Skills and Capacities - Sacred Groves and Sites - Places of Historic and Cultural Significance - Important Historic and Cultural Documents and				

Texts - Systems of Natural Resources Use - Traditional Architecture				

Figure III : Cultural Impact Assessment Variables, by Project / Policy Type and Stage

Project / Policy Type	Planning/ Policy Development	Construction / Implementation	Operation/ Maintenance	Decommissioning/ Abandonment
Cayor CanalProject (Senegal)				
Submarine Gas Pipeline Project (Hong Kong)				
Development of a Landfill (New Zealand)				

V – PROCEDURE FOR CONDUCTING CULTURAL IMPACT ASSESSMENT

Although every policy framework, program or project is unique, in most cases there is a series of more or less standard steps through which the analysis must proceed in order to achieve good results:

STEP 1 : Develop an effective Public Involvement Plan, so that all affected interests will be involved

This requires identifying and working with all potentially affected groups starting at the planning stages of the proposed action.

The level of public participation needed varies with the nature of the project. For a complicated project, it might be necessary to undertake a participatory enquiry survey of the affected groups, complementing it with personal interviews of the group representatives to determine the general character of the affected community, define the potentially affected groups, determine potential areas of concern and impact, and determine enough about them to know how to involve them.

The data and information obtained at this first step assists in the development of a public involvement program which should last throughout the assessment process.

In a simpler project, merely consulting with local opinion leaders or local power groups and experts, may be sufficient to obtain the critical data on which to build a public involvement program.

STEP 2 – Describe the Proposed Action or Policy Change and Reasonable Alternatives

In this step, the proposed action is described in enough detail to begin to identify the technical data requirements needed from the project proponent to frame the CIA. The following provides basic technical information and data needed from the proponent:

- location of project
- land requirements
- needs for ancillary facilities (road, transmission lines, utilities)
- construction or implementation schedule
- size of the work force (construction and operation by year or month)
- facility size and shape (if a facility is involved)
- need for a local work force
- institutional resources

The list of cultural impact assessment variables shown in Figure II is a guide for obtaining data from policy or project proponents.

STEP 3 : Define Baseline Conditions

The baseline conditions are the existing conditions and past trends associated with the human environment in which the proposed activity is to take place.

Having established a means of working with the public, and obtained basic technical data and information on each proposed action/policy or alternative, in steps (I) and (II), the CIA Assessor now tries to define the pertinent existing conditions in each potentially affected area. That is the affected cultural environment. This is known as baseline study.

The Assessor seeks answers to questions like:

- What populations may be affected, Are they concentrated or dispersed?
- How does each population relate to the natural or built environment?
- What is the historical background of each population?
- What are the political, social and cultural resources, institutions, structures and forms of organization and networking in each group?
- Are there minority or indigenous groups involved? Do they have special needs?

- What cultural practices, beliefs and value systems characterise each group? How do they feel about modern political and social institutions? How do they relate to the environment? To change?
- What are the major forms of expression for each group or community?

At a minimum, this kind of information should be developed based on existing literature, government documents and consultation with experts and the community. For a more complicated project/policy, more formal studies based on empirical evidence may be needed. This could include geophysical surveys, archaeological excavation, ethnographic surveys, historical case studies, cultural cartography, etc.

Step 4: Identify and Define the Significant Impacts

After obtaining a technical understanding of the proposal, the CIA Assessor must identify the full range of probable significant cultural impacts that will be addressed based on discussions or interviews with numbers of potentially affected groups.

Relevant criteria for selecting significant impacts include;
- Probability that an event will occur
- Number of people including indigenous populations that will be affected
- Duration of potential impacts
- Values of benefits and costs to affected groups
- Extent that the impact is reversible or can be mitigated
- Likelihood of subsequent impacts
- Relevance to policy decisions
- Uncertainly over probable effects
- Controversy over the issue

STEP 5 : Investigate the Significant Probable Impacts

The probable cultural impacts will be formulated in terms of predicted conditions without the action (baseline conditions), predicted conditions with the action; and predicted impacts which can be interpreted as the differences between the future with and without the proposed action.

Investigation of probable impacts involves the study of data provided by agencies, records of previous experience with similar actions or similar populations, census data and other vital statistics, documents and secondary

sources and field research involving interviews, focus group discussion sessions, surveys, participant-observation and other participatory enquiry techniques.

As cultural change takes a much longer time to notice, methods of projecting the future cultural environment is not easy as whole series of intervening factors can influence the process of change. What is possible in a given circumstance also depends on several factors such as the scope of the action/policy, the area where it occurs and the availability of pertinent data. Projection methods include, but not limited to:

- Longterm Perspective Planning (Futures Studies)
- Comparative Method-comparing with similar actions and their effects
- Straight-Line Trend Project-taking an existing trend and projecting it into the future
- Expert Advice – obtain the thoughts of experts and Local Opinion Leaders or Traditional Change Agents about likely scenarios and change.

STEP 6 : Predict the Response of the Affected Communities to the Anticipated Impacts

Given what we know about the potentially affected groups and the kinds of impacts we predict, what will be the likely response of the groups?

Will a group be highly influenced by what its leaders think, and will the leadership be positive or negative about a project? Are there ways for the population to adapt in place, or is it likely to relocate? Can a group continue to maintain its valued ways of conducting its cultural life, its forms of cultural expressions, cultural institutions, organizations and networking and its cultural resources and infrastructure?

STEP 7 : Consider Indirect and Cumulative Impacts

Actually this is not a "Step" in the analytic process as much as it is an aspect of several steps. Most cultural impacts are not direct, they may occur well after the action is taken or the policy is implemented, and possibly in areas distant from the project. Many populations, especially indigenous groups, are severely at the risk of cultural extinction in certain countries, due to a variety of pressures, and a given project may be all that it takes to push the group "over the edge".

STEP 8 : Recommend new Alternatives as needed and feasible

As serious impacts are identified, consider what alternatives might alleviate the problems, and work with the Project Managers or Planning Agencies and the affected groups to determine whether these can be pursued. When there is contention mediation may be very helpful in resolving disputes about which alternatives should be considered or selected.

STEP 9 : Develop a Mitigation Plan

A cultural impact assessment should not only forecast impacts, but should equally identify the ways and means to mitigate adverse impacts.

Mitigation involves avoiding the impact by not taking or modifying an action; minimizing, rectifying or reducing the impacts through the design or operation of the project or policy; or compensating for the impact by providing substitute facilities, resources or opportunities.

Mitigation could sometimes be a complicated and resource demanding exercise, but whether the project proponent or the planning agency or the affected community is going to assume responsibility for the realisation, standard procedures require that the mitigation measures be identified, properly defined and documented in appropriate legal and administrative instruments.

In view of the complexity of the issue, it might be advisable to adopt a sequencing strategy for managing the mitigation of adverse cultural impact, modelled after the one recommended by the Ramsar convention on wetlands.

**Box IV: Sequencing Strategy for Managing the Mitigation
of Adverse Cultural Impacts**

Sequence I: Project Managers / Policy Formulators strive to avoid all adverse impacts

Sequence II: Project Managers/Policy Formulators strive to minimize any adverse impacts that cannot be avoided

Sequence III: Project Managers/Policy Formulators compensate for adverse impact that cannot be avoided or minimized

Source: Ramsar Convention on Wetlands (1971), Ramsar, Iran

The two steps of sequencing-avoiding and minimizing, can apply to the project itself or to the host community or the impacted region. Compensation on the other hand could be to acquire a different site or to relocate a population to be affected by a proposed development action/policy. The amount of compensation could be determined by the type of land or facility lost, the severity of the impact and the location of the mitigation site.

In the light of the complexity of addressing several diverse issues in mitigation arrangements, the CIA assessor must first rank the level of importance of each significant CIA variable determined in step (5) (Investigation of probable impacts).

Box V : Evaluating potential mitigation of cultural impact assessment variables

STEP ONE: To determine whether the project proponent or policy formulator could modify the proposed project or policy to avoid the adverse effects on the local community
An example could be a road construction which has the potential of displacing communities or destroying their long-cherished cultural resources as the example in Box (I) shows – "Cultural challenges to road planning, design and construction in Bali (Indonesia)".

STEP TWO: To identify ways and means of minimizing the adverse cultural impacts
For example, local communities could sometimes be uncomfortable with the idea of locating a facility perceived as risky or undesirable for religious, health or cultural reasons. Such attitudes once formed about a project from the onset might prove difficult to eliminate, but could be moderated if the public has complete and factual information about the proposed development or policy to enable them to take independent informed decisions; are actively involved in the decision-making process relating to the facility, or are provided with adequate arrangements that assure safe operations, thus minimizing adverse effects on the community.

STEP THREE: To identify and compensate for unresolvable cultural impacts.
There are three possibilities to effect compensation
1 – Identify methods of compensating individuals and communities for unavoidable impacts
2 – For the community to identify the provision of other basic needs or quality of life variables as compensation for the adverse effects
3 – Identification of unresolvable cultural impacts jointly by project managers / Policy formulators and community opinion leaders to give residents a feeling of sensitivity to their concerns.

STEP 10 : Develop a Monitoring Plan and Program
A monitoring plan should be developed to observe the performance of program and project delivery, compare projected impacts from real impacts and prescribe the additional measures to be taken for accommodating unanticipated impacts when they occur.

In addition to the monitoring plan, a monitoring program should be put in place that is capable of identifying deviations from the proposed action or policy. The program is also necessary for programs or projects that lack detailed information or those with high variability or uncertainty.

If monitoring procedures cannot be adequately implemented, then mitigation agreements should acknowledge the uncertainty in implementing the decisions. Monitoring could equally be a joint activity between the project proponent and the affected community. The former hardly has the time and commitment to follow rigorous monitoring procedures through to logical conclusions. In this regard, the project should vote a budget line for the activity and delegate aspects of the monitoring exercise to the community, especially aspects that they have the capacity to do better.

VI – CONCLUSIONS AND RECOMMENDATIONS

VI.a – Constraints of Cultural Impact Assessment

As a system that is an evolving process, the present guidelines are expected to gradually evolve to meet changing circumstances and situations, hence the need for periodic review. This evolving dimension of CIA makes its application a real challenge for practitioners and these include, but not limited to the following:

1. The guidelines could be considered as a minimum of good practice. Some countries and organizations may observe more advanced standards than those outlined here. Others will certainly require the building of human and institutional capacity before they are fully equipped to give effect at every level and every aspect of the CIA process;

2. Collection of supporting baseline data for CIA and the design of subsequent monitoring systems may be difficult and expensive;

3. The Planning Authorities may include members from different ministries, public and private agencies. Sometimes there may be no representatives from responsible cultural agencies to set guidelines for the preparation of a CIA, to receive and evaluate the draft and eventually the final CIA;

4. Although the planning authority may approve the final CIA, the legal licensing of the project may depend upon a multitude of local, regional and national planning commissions, sectorial ministries and specialised agencies. It is sometimes a long and confusing process;

5. CIA complicates an already complex procedure for planning and project approval. Therefore, expertise in cultural resources management, cultural impact assessment and in local, regional and national planning processes is essential;

6. The project proponent must accept as normal the long delays in CIA studies and negotiations. In the interim period, safeguards must be introduced to avoid destruction or damages to the cultural environment that would have serious implications for the proposed development activity in the future;

7. Implementing the ten-step procedure in carrying out a CIA is only the first stage in gaining acceptance of a new activity which may have significant cultural impacts; legal and administrative support is required to enhance its application.

8. To improve the CIA process, cultural agencies and development agencies should work together closely in setting cultural conservation standards, laws and regulations.

VII.b – Application of CIA Results: The Way Forward

Cultural impact assessment is predicated on the notion that policy and decision makers, planners and project managers should understand the consequences of their decisions and actions before they act, and that the affected people will not only be appraised of the effects, but have the opportunity to participate in designing their future.

Perhaps because of the complexity of managing cultural change or the political implications of incorporating cultural dimensions in development policy, programs and projects, cultural impact assessment has not been well integrated into the planning, policy formulation, decision making process and program or project cycle of development agencies.

The principles and guidelines presented herein are designed to assist development agencies and other institutions in carrying out cultural impact assessment on the understanding that if a well-prepared CIA is integrated into the decision making or policy formulation process or programs / project cycle, better decisions, policies and actions will result.

An enormous amount of different types of cultural impact assessment work is done all around the world. Ideas are constantly evolving as to how to make it more standardized, widespread and effective. Most of these instruments are agency-driven, designed by various development agencies and sometimes individual experts as part of their program or project evaluation framework. Because of the multiplicity of agency-specific CIA, there are remarkable variations in approaches and experiences. This situation calls into question the need to come up with standard guidelines to provide common or basic minimum standards for assessing the cultural impact of policies or projects.

Equally several guidelines have been developed, some specifically designed to assess cultural impact of policies, of programs and of projects. Guidelines also exist to assess impacts relating to the environment, economic, social, political, risk, technological, health, etc.

In the light of the above situation, the questions we are constantly confronted with include:
- should there be greater "vertical integration" between policy, program and project cultural impact assessment methods?
- should there be greater "horizontal integration" of environmental, political, economic, social, cultural impact assessment techniques?
- how can we develop genuinely participative impact assessment processes?

- considering the importance of cultural differences to sustainable development, how useful are international principles and guidelines in effectively addressing the unique problems of communities.
- can impact assessment be both a tool for accountability and learning?
- what are the costs and benefits of adopting cultural impact assessment?

The guidelines presented here have made attempts to address the above concerns in a single document. However, if an aspect of the goal of a CIA is to preserve and promote cultural diversity for enhancing sustained development, then this can definitely be achieved in two parts; through a CIA statement, and legal and administrative support.

The present guidelines address only the first part of the goal-that is to give planners and decision-makers better information about the consequences which development policies and actions could have on culture.

The second step is to make sure that support is given to the CIA statement by ensuring that policies formulated, decisions taken and programs or projects implemented are culturally-sensitive, through the formulation of additional policies or laws which can enhance the securing of such results.

In regards the CIA process itself, whenever information is required on likely future change in the cultural environment of a given area or community, a CIA of the causative actions may be appropriate. Some development actions may safely be considered to have insignificant effects. In this case, the CIA system should incorporate a "screening" process to identify which types of actions or policies should be subject to CIA and which ones could be left out.

The CIA refers to the whole appraisal process from identification of probable impacts to acting on the results of the investigation in decision-making. The part of the process which comprises carrying out the investigation and prediction of likely effects, and reporting on this, is typically undertaken by the program / project proponent or his/her agent.

The risk of bias in this is reduced in those cases where the investigation is commissioned and supervised by the relevant decision-making authority, or where there are systems for independent verification or peer review of the work according to recognized standards.

Sometimes the decision-making authority itself may be the proponent of programs and projects which are subject to CIA. In such cases transparent procedures which ensure impartiality should be followed.

It is conducive to an integrated approach and to a true appreciation of project costs and benefits, when the costs of the CIA exercise are fully borne by the proponent.

Use should be made of suitably qualified and experienced professionals with the requisite expertise in the relevant fields, and competent to apply correct methods with the rigour required during the assessment and evaluation stages.

Decision making authorities should likewise equip themselves with the requisite technical expertise and advice for judging the adequacy or otherwise of assessments, and for taking their findings properly into account.

Provision should be made for consultation and participative involvement of local people, interested non-governmental organizations and the general public in the CIA process. Such people and organizations should be afforded an opportunity, in defined circumstances to challenge information and observance of relevant procedures which they believe to be deficient. Equally, if the information presented in the cultural impact assessment report or the cultural impact statement is considered deficient by the decision-making authority, they should have the ability to request further information and defer decision until it is provided.

The CIA report should be made available to the public preferably with a summary written in non-technical language which could be separately published.

Relevant decision-making processes should give due weight to the results of the CIA, such that unfavourable findings may be sufficient grounds to refuse consent or require modifications. Decisions should be published, showing the manner in which they have been influenced by a CIA carried out.

During the operational or implementation phase of approved policies, programs or projects, the CIA should be used as a framework for monitoring actual effects and comparing these with predictions, ensuring mitigation measures perform as expected, making any operating adjustments required, and reporting on this.

To provide an adequate enabling environment for its application, CIA systems should be officially enshrined within the policies, laws and administrative systems of the country. In this respect, measures should be adopted where possible to ensure that:
- application is systematic, consistent and publicly accountable;
- legal implementation is enforced;
- a code of ethics is agreed and applied;

- ethical guidelines on good practice is made available for the use of CIA practitioners;
- sufficient status is given to the CIA element in decision-making processes, alongside other considerations, so that it is seriously approached and genuinely influences outcomes.

The most common use of CIA techniques is in relation to single individual proposed development. In principle, it could however apply to programs or sequences of several such projects, strategic plans or visions from within which they derive.

CIA could also be an important element of international development cooperation programs; as corporate management tools for businesses or built into public policies and laws for the purpose of accountability and regulation of what is done in the public interest.

In the case of regional integration organizations, multilateral and bilateral development agencies and regional development banks, it is clearly in their interests to standardize laws and regulations on this subject, so that member states do not suffer differential competitive disadvantages by operating under different rules.

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