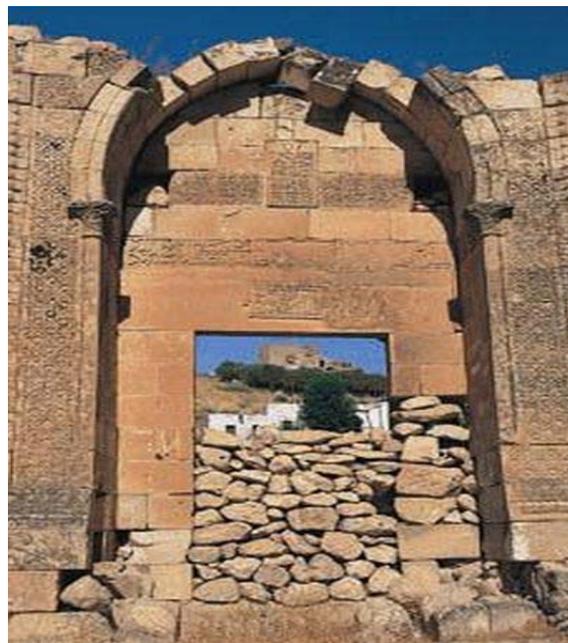




Notes on the feasibility of the Archaeological Salvage Plan

Review of the EIAR for the Ilisu Dam and HEPP



**Submission by
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February 2006

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Executive Summary

Background of assessment

The Ilisu Campaign¹ asked archeological experts to provide comments on whether the archeological aspects of the EIAR (2005) are technically feasible within the given time-frame. Therefore this assessment is based on interviews with international and national archaeologists who have been recently working for the Turkish state and who either work or worked in the region of the proposed Ilisu Dam or at other archaeological sites in Turkey. We assumed that the people who would eventually carry out the cultural salvation of the EIAR would be the best to comment on whether its timeline, assumptions and plans were feasible.

Because most of the archaeologists work in various archaeological projects for the Turkish state at the moment, interviews were given with the understanding that their names would be withheld.

Objectives

This review assesses the technical feasibility and practicability of the EIAR's cultural salvage plans for the Ilisu Dam project. It does not assess or evaluate if the measures projected in the EIAR itself are sufficient to deal with the actual loss of cultural history caused by the proposed Ilisu Dam, nor if the measures reflect internationally-accepted practice.

Major findings

The survey concludes that the salvage plans set out in the EIAR do not relate to the practicalities of the work on the ground and in fact could not be implemented as foreseen in the EIAR. The archeologists found that the EIAR is unrealistic and inaccurate in its assumptions and does not reflect internationally –accepted practice.

In contrast to local reality, the EIAR makes incorrect assumptions about timing and resource demands. It fails to address structural deficits in the practical context of salvage work in the region, miscalculates labor requirements and lacks funding for

¹ The Ilisu Campaign is a coalition of: The Berne Declaration (Switzerland), WEED (Germany), ECA-Watch (Austria), Fern (Belgium), The Cornerhouse (UK)

hardware. Aside from technical aspects, the EIAR completely fails to take into account the problematic security situation in the region, which makes it impossible to carry out any work at many archaeological sites of the Ilisu Reservoir. Consequently, the EIAR plans for cultural salvage of the Ilisu Dam must be concluded to be both incorrect and misleading.

In detail, the findings of the archaeological experts working in Turkey at the moment indicate the following:

- The timing schedule of the EIAR is unrealistic for several reasons (listed below), including the momentous assumption that work could take place during 10 months of the year.
- The EIAR contains incorrect technical assumptions about the amount of work, based on a simplistic view of the work on tells.
- It will therefore not be possible to do the work in the given timeframe.
- The EIAR fails to take into account legal requirements, administrative procedures and their actual implications for the implementation process.
- The EIAR underestimates the amount of human labor needed to conduct this scheduled work, both in team size as well as the number of teams.
- The EIAR does not take into account that the pool of skilled professionals within Turkey and abroad is very limited, and is insufficient to cover the work needed.
- The EIAR contains unrealistic assumptions about the maximum time that professional archaeologists are able to commit, aside from their duties at universities.
- The EIAR fails to provide sufficient funds for non-labor expenses.
- Most of all, archaeologists potentially working in the Ilisu Reservoir are strongly irritated that EIAR does not take into account the ongoing conflict that prevents archaeologists from doing any work at all at important archaeological sites within the Ilisu Reservoir (especially in the Garzan and Botan valley). Therefore they view the EIAR to be negligently misleading.
- Similarly, they are deeply concerned about land mines, which the EIAR fails to mention altogether.

1. Introduction

1.1 Scope

Extensive research and fact-finding missions by KHRP and the University of Ireland² have shown that the cultural salvage approach and measures described in the updated EIAR are insufficient to deal with the actual loss of cultural history by the proposed Ilisu Dam. Among others, plans for cultural salvage took little notice of the living culture of the people now living in the reservoir. Also those who are directly affected have not been participating in the planning of mitigation measures. For detailed analyses we refer to existing studies and the upcoming submission by Ms. Maggie Ronayne/University of Ireland on the UEIAR 2006.

These failures to meet international standards are not further addressed in this review, however. This review does not address:

- if the cultural salvage approach is appropriate or sufficient in any regard;
- if the testimonials of thousands of years of history should be sacrificed for a project with a lifespan of a few decades;
- if the present culture of the people living in the reservoir is affected;
- the site of Hasankeyf³.

This review is narrowed down to additionally investigate whether the existing cultural salvage plans in the EIAR – assuming they would be an accurate way to

² 2000 The Ilisu dam project in Southern Turkey. *World Archaeological Bulletin* 12, 7-12. 2000

2001 The Ilisu Dam Project in Southeast Turkey. *World Archaeological Bulletin* 13, 17-33. 2001.

2002 The Ilisu dam environmental impact assessment report: review and critique. *Public Archaeology* 2, No. 2, 101-116 (with W.H. Kitchen), 2002

2003 *The Ilisu Dam: Displacement of Communities and Destruction of Culture*. London: Kurdish Human Rights Project and National University of Ireland, Galway. 211 pp. 2002

2005 *The Cultural and Environmental Impact of Large Dams in Southeast Turkey*. London: Kurdish Human Rights Project and National University of Ireland, Galway. 166 pp.

³ The public discussion on cultural heritage is very much focused on the site of Hasankeyf. All interviewees stressed that the issue and problems are much larger than from a strictly professional point of view. The area of the Ilisu Reservoir has been part of the Mesopotamian culture, which is not only of local relevance but of worldwide interest for obvious reasons. It was the very period when humans settled down for the first time in bigger settlements; it was the period when they started agriculture and animal husbandry. As children in elementary schools around the world are taught the importance of Mesopotamian culture, this early development of civilization is seen as having great importance for the understanding of the evolution of mankind.

treat with the loss of culture - would in fact reflect the realities on the ground and are therefore both accurate in its assumptions, technically valid and feasible.

2. Assessment of the archeological work of the EIAR

2.1 EIAR's Time Schedule

- a. The EIAR contains incorrect assumptions about the yearly time span that professional archaeological work in the region can take place. Weather conditions such as heavy rainfall (among other reasons) make it impossible to do professional work before April and after November. Thus the maximum timeframe for work is 7 months and not 10 as the EIAR assumes. The timing in the EIAR is therefore completely unrealistic by overestimating the available time span by over 40 percent.
- b. To begin with a detail, the experience of archaeologists shows that it is also unrealistic to get a license in spring to work in spring, as the EIAR timing suggests. From all recent experience, the Antiquities Service (Kültür Varlıkları ve Müzeler Genel Müdürlüğü) is not expected to issue any licenses before late May/June 2006. Thus work in April and May would not be possible as the EIAR implies.
- c. More generally, the EIAR completely fails to acknowledge the reality of the time it takes to obtain a license. Generally, Turkish law demands that every single archaeological salvage project be approved by the Council of Ministers. In practice this has been bypassed by a simplified procedure, based on cooperation between the scientists and a museum. However due to a resolution in 2004 (dated 16.1.2004) this simplified procedure will be repealed at the end of 2006. This would mean that all projects need approval by the Council of Ministers.

Experience with prominent archaeology projects in western Turkey, where international teams have been working for years, shows that it took several months – and in some cases up to a year – to get the

approval of the Council of Ministers, even when only the leader of a previously-licensed team was to be replaced.

- d. The Turkish Kültür Varlıkları ve Müzeler Genel Müdürlüğü does not want teams to swap members or change work locations. However the EIAR expects teams to do a lot of different surveys in different locations. In practice this is likely to conflict with the “Antiquities Law” and does not relate to the realities of the institutional setting.
- e. Even if the dam will be dismantled after attaining its lifespan (e.g. after 70 years), all archaeological sites will have been destroyed, because of the deformation of the underground by the water pressure and flow. All that is being done now is a form of rescue archaeology. As the sites will be destroyed forever, documentation and publication of these findings is seen as crucial. Publication, however, will not be possible in the way the EIAR foresees. Timelines for publication in the EIAR (less than 1 year) do not reflect reality. All archaeologists have other projects to work on or university obligations – as is the case for nearly all Turkish archaeologists. Five years is considered to be a realistic estimate for any serious publication. The assumptions of EIAR are even less stringent when considering that only a fraction of the work could be published in the cases of the Atatürk, Keban and Karakaya Dams.

2.2 EIAR's Resource Calculation

2.2.1 Calculations of Labor Intensity

Besides the fact that the EIAR fails to apply any realistic timeframe, it also does not take into account the lack of skilled and trained human resources.

Turkish law demands that every archaeologist working on a salvage project as head of excavation must have at least a PhD. Practically all Turkish archaeologists who have the expertise to do the cultural salvage work of the Ilisu EIAR work at Turkish universities and – needless to say – have various other teaching and/or research duties during the course of a year. Besides university archaeologists, there are no Turkish companies that specialize in salvage archaeology like the British Oxford Archaeological Unit, which has been working professionally in the area (especially at Zeugma on the Euphrates). All Turkish archaeologists interviewed stated very clearly that it is completely unrealistic to assume that they will be able to work 10 months full-time as the EIAR suggests.

At the same time, it is unreasonable to assume that the Turkish government will pay for the work of several international teams. On the contrary, the general policy has always been to provide public funding for Turkish teams but not for international teams, as they were expected to have their own funding.

However many international teams per definition do no fund-raising for salvage projects (for example the Deutsche Forschungsgemeinschaft), because they consider the preservation of monuments and historic buildings to be a duty of the state. Even if their policy would not exclude them from conducting this work on the basis of their own funds, they would have little chance to raise funds under a focus of scientific research in their home countries and from international donors, mainly due to the ethical issues with the dam.

Thus it is not surprising that on the first call for archaeological salvage work at Ilisu in 1999, only nine teams applied. Most of them came from Turkey, two

from USA and one from Germany. Archaeologists eagerly question how there should be enough teams available now to work on 10-20 locations like the EIAR suggests.

Also, EIAR's assumption of having five archaeologists and 15 workers to constitute an operational team does not reflect the actual experience and demand on the ground. For working on a single tell, present U.S. and German teams in Turkey work with a minimum of 30 workers and around 8-10 archaeologists and students.

This shortcoming in the assessment of the labor needs for the cultural salvage work of the EIAR is made worse by the fact that the EIAR severely underestimates some of the work itself by making incorrect technical assumptions. It generally seems to have a quite simplistic point of view of the work necessary. That is, the EIAR does not take into account that it is expected to find not only buildings of stone, but Roman city complexes and even more problematic prehistoric remains which are built out of clay brick and are much more complex to work on than the site of Hasankeyf from which experience the EIAR seems to extrapolate.

Part 6 of the EIAR falsely classifies several tells as "tumulus" (EIAR Part 6). The latter is a grave where it is assumed that the material on the grave does not contain relevant material, because there was only one period of settlement. Obviously it is much easier to dig out. However most of the sites mentioned in Part 6 of the EIAR are in fact tells, so that there are several structures of buildings in different layers (like Troya), making the project much more extensive if carried out under any professional standards.

All experts agreed that if the regime of the EIAR would be taken seriously, not a single tell that the EIAR predicts will be "fully unearthed" can be expected to be fully unearthed and explored in the given timeframe.

2.2.2 Lack of State Representatives

In order to comply with legal requirements, there must be at least one representative of the state present at every excavation project in the country, including salvage digs. In practice, employees of museums have been fulfilling this duty; however during the summer there is typically a crucial lack of representatives. In 2005, teams would have been ready to work but were not allowed to, because no representative of the state was available⁴. Interviewees stated that it was unlikely for more representatives to be available, as they are in fact reluctant to go into the area, especially due to the critical security situation.

2.2.3 Lack of Funds for Non-Labor Expenses

For the most part, the EIAR only accounts for labor costs, and to a large degree fails to account for other costs. It will be impossible to do any work without vehicles, accommodation, meals, etc.

2.3 Security Situation

The security situation is a huge – and possibly the biggest – problem in the view of experts who would potentially be working within the Ilisu Reservoir area. They state clearly that with the given environment of conflict, it will be impossible to carry out large parts of salvage projects scheduled in the EIAR. It is deeply misleading that the EIAR is completely silent on this.

Nearly 10 important salvage project sites of the Ilisu Reservoir are located in the Garzan Valley (Beşiri/Batman), where there were several shootings in 2005. The conflict made it impossible to work there that year. Since a relatively peaceful period in 2002 and 2003, during which work in the Garzan area was

⁴ Only in individual cases, where there was a trusting relationship between the scientific director and the director of the museum, did the latter personally take the risk of having a team work alone, despite the legal requirement for the presence of a state representative.

still impossible, armed conflicts in the region have intensified over 2004 and 2005.

Archaeologists, who should have worked in the Garzan valley in 2005, have been refused entrance by the military, which is responsible for archaeologist security.

The same must be concluded for all archaeological sites in the Bothan-Valley (Siirt) within the Ilisu Reservoir. Members of two different universities recently worked there, but at serious personal risk. Cars came under fire several times on roads leading to the sites, and craters remain from earlier bomb attacks on security forces⁵.

Secondly, at the part of the Ilisu Reservoir where there is no current danger of being fired upon, land mines are a serious risk to the archaeologists. But land mines are not addressed in the EIAR (mines were found during surveys at Cattepe at the confluence of the Botan and the Tigris). When archaeologists were asked to examine the actual location of the Ilisu Dam construction in 2002 and 2003, only a small area had been secured from land mines and could be walked on and examined. In the Garzan and Bothan Valleys it is generally not possible to move around freely off-road, both because of the danger of being shot at if archaeologists move beyond certain boundaries around the villages, and because of land mines⁶.

Land mines are a great risk when conducting an archaeological excavation. The fact that the EIAR does not mention the context of conflict or land mines is negligent and irresponsible towards the people who are supposed to work there. The potential and existence of an armed conflict in parts of the Ilisu

⁵ Many archaeologists still remember 1991, in Nusaibin (on the Syrian border), when a team from Ankara University was bombed, with two of the archaeologists killed.

⁶ It should be noted that the updated version of the EIAR shows a little more data than the old EIAR. This database however mainly reflects the work done by Prof. G. Algaz (Univ. of San Diego) between 1998 and 1990. Due to security reasons no major exploration of the Ilisu Reservoir has been undertaken since then. Even today, large areas (such as the Garzan, the area from the confluence of the Botan and the Tigris down to Ilisu, and the parts of the Botan Valley north of the Siirt-Eruh road) are not accessible because of the increase in armed conflict and personal land mines.

Reservoir is more than a crucial element that must not be ignored when conducting an EIAR. There is no excuse for failures in quality when important parts of the salvage work is impossible or would put people's lives at risk.

3. Conclusions by the interviewed experts

Experts based in Turkey, potentially carrying out the cultural salvage work of the Ilisu Dam conclude that the EIAR plans for cultural salvage are not feasible from a professional perspective, as they imply incorrect assumptions on timing, incorrect assumptions on resource demands, little knowledge about the practical realities of the work on the ground, failures to take structural deficits into account, shortages of resources and administrative obstacles, as well as a miscalculation of labor necessary and a lack of funds for non-labor expenses. Most of all, they completely ignore the security situation in the region – although the latter has both serious implications for the practicability of the plans and the lives of the people who would work there.

Documentation and references in this review are limited for understandable reasons. Besides the fact that the cultural salvage plans of the Ilisu EIAR fail to meet internationally-accepted practice, the assessment in this review strongly indicates that EIAR also does not reflect the realities on the ground and is therefore also technically invalid in many respects.