

NGO Audit Program: *CULTURAL HERITAGE* Working Group Report
BP General Response

BP is pleased to take this opportunity to thank the Cultural Heritage Group for their participation in the BP/BTC/SCP – OSI NGO Audit Program. We would like to congratulate the group for a quality report, an outcome with value for BP and (we hope) the NGO participants alike. While we provide more specific, technical and audit-oriented responses in the results table, this general response is intended to provide BP and SCP reaction to the overall conclusions and key issues raised in the report.

In examining how SCP and partners have met commitments to preserve and protect Azerbaijan's cultural heritage during the construction of the SCP pipeline, the NGO Auditors repeatedly insisted that such due diligence was of paramount importance. We agree. While BTC/SCP's successful presentation to the people of Azerbaijan (and the world) of new cultural and archaeological discoveries represents an important positive legacy, missing this opportunity would have been a short-coming of huge significance. Thus we are pleased that the Audit Group characterizes our overall performance as successful, and we welcome the constructive suggestions that the group provides. We would add that a number of the group's findings concerning public outreach in fact anticipate our future, planned activities.

We agree with the Audit Group's assessment that the provision of appropriate cultural heritage and archaeology training is vital to minimize risk of oversight and error in the field. As is suggested by the group, comparable future construction activities should and indeed will continue to include extensive training on these topics, tailored to meet the needs of the trainees.

We also agree with the Audit Group's assertion that the Gobustan Reserve is an important part of Azerbaijan's cultural heritage; deserving of significant investment aimed at its preservation for the enjoyment and enrichment of future generations. However we contest the notion that by ill-considered decision-making, pipeline routing has compromised the Reserve. We are surprised that the Audit Group has reached this conclusion. Our view, and that of other external auditors, is quite the contrary. Careful routing selection, in conjunction with state authorities, has allowed successful pipeline construction *without* archaeological or cultural impact on the Reserve. Additionally, we have provided direct assistance to the Gobustan Reserve (and the Ministry of Culture) to assist their management efforts.

We were surprised to learn that the Audit Group considers SCP/CCIC control of construction activities, as pertains to archaeology, to be inadequate. The group is certainly correct to point out that such control is indeed one of our commitments; in fact, it is an entirely appropriate area for audit and review. However, we understand "control" to mean that specialist archaeological surveillance will be present during construction, and that this would include the ability, by the archaeologist, to halt construction activities should cultural or archaeological discoveries warrant such an action. Without such a "watching brief" regime, we believe the likelihood of inadvertent damage to artifacts is greatly increased. We would argue that the positive archeological legacy of the AGT projects is in no small part due to our successfully meeting this commitment and fielding professional archaeologists with the authority to stop work.

In conclusion, we would again like to thank the Cultural Heritage Group for their efforts, insights and recommendations. We congratulate the group, and hope that their participation in the NGO Audit Program has been rewarding and useful.