



The World Archaeological Congress

World Archaeological Congress Comments and Suggestions for Additions and Amendments:

‘For Public Comment: November 2 – December 15, 2017 - World Bank Environmental and Social Framework (ESF) Draft Guidance Notes for Borrowers’

World Archaeological Congress Executive*

(Finalized 13 December, 2017)

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1. BACKGROUND

The World Archaeological Congress (WAC), with members in more than 90 countries, is the only fully international and globally representative organisation of practicing archaeologists. As a non-governmental, not-for-profit organization, WAC's mission is to (1) promote professional training for disadvantaged nations and communities; (2) broaden public education, involving national and international communities in archaeological research; (3) develop archaeological practice so that it empowers Indigenous and minority groups; (4) contribute to the conservation of archaeological sites threatened by looting, urban growth, tourism, development or

war; and (5) re-dress global inequities amongst archaeologists. WAC holds an international congress every four years to promote its mission.

2. General Points

The WAC executive finds that ‘Guidance Note for ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities’ in ‘For Public Comment: November 2 – December 15, 2017 - World Bank Environmental and Social Framework (ESF) Draft Guidance Notes for Borrowers’ does not sufficiently take into account the importance of Indigenous representation, laws, and value systems, particularly those pertaining to land rights, sovereignty, and unique perceptions of the environment. We are particularly concerned with the draft’s insufficiency in ensuring that IP/SSAHUTLC have final say on the planning and the implementation of World Bank-sponsored projects, and with the draft’s lack of recognising LGBT individuals in IP/SSAHUTLC. We also find that the document fails to acknowledge the sensorial, perceptible and cosmological contexts for artifacts, landscapes and other natural features, which are increasingly recognised as important constitutive elements of cultural heritage.

3. Suggestions for additions and amendments

Deriving from the general points presented above, we would like to suggest following additions and amendments.*

*added or amended words/sentences are printed **red**

Page 2, 3:

This ESS recognizes that the roles of men and women in indigenous cultures are often different from those in the mainstream groups, and that women and children have frequently been marginalized both within their own communities and as a result of external developments, and may have specific needs.

Our comment:

A highly sensitive issue, and local communal norms need to be carefully considered on this particular issue.

Page 2, Footnote 3, Last four lines:

This ESS recognizes that the roles of men and women in indigenous cultures are often different from those in the mainstream groups, and that women and children have frequently been marginalized both within their own communities and as a result of external developments, and may have specific needs.

should read thus:

*This ESS recognizes that the roles of men, women **and LGBT individuals** in indigenous cultures are often different from those in the mainstream groups, and that women, children **and LGBT individuals** have frequently been marginalized both within their own communities and as a result of external developments, and may have specific needs.*

Page 3, Objectives, Last point:

To recognize, respect and preserve the culture, knowledge, and practices of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and to provide them with an opportunity to adapt to changing conditions in a manner and in a timeframe acceptable to them.

Our comment:

When IP/SSAHUTLC do not want to adapt to changing conditions, their will needs to be respected utmost.

Page 3, Objectives:

Word: 'meaningful consultation'

Our comment:

A clarification needs to be made in each case.

Page 5, Footnote 6:

"Collective attachment" means that for generations there has been a physical presence in and economic ties to land and territories traditionally owned, or customarily used or

occupied, by the group concerned, including areas that hold special significance for it, such as sacred sites.

should read thus:

*“Collective attachment” means that for generations there has been a physical presence in and **spiritual and** economic ties to land and territories traditionally owned, or customarily used or occupied, by the group concerned, including areas that hold special significance for it, such as sacred sites.*

Page 5, 9:

This ESS also applies to communities or groups of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities who, during the lifetime of members of the community or group, have lost collective attachment to distinct habitats or ancestral territories in the project area, because of forced severance, conflict, government resettlement programs, dispossession of their land, natural disasters, or incorporation of such territories into an urban area ⁷. This ESS also applies to forest dwellers, hunter-gatherers, pastoralists or other nomadic groups, subject to satisfaction of the criteria in paragraph 8.

should read thus:

*This ESS also applies to communities or groups of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities who, during the lifetime of members of the community or group, have lost collective attachment to distinct habitats or ancestral territories in the project area, because of forced severance, conflict, government resettlement programs, dispossession of their land, natural disasters, or incorporation of such territories into an urban **and/or industrial and/or farming** area ⁷. This ESS also applies to forest dwellers, hunter-gatherers, pastoralists or other nomadic groups, subject to satisfaction of the criteria in paragraph 8.*

Page 5, Footnote 7:

Care must be taken in application of this ESS in urban areas. Generally, it does not apply

to individuals or small groups migrating to urban areas in search of economic opportunity. It may apply, however, where Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities have established distinct communities in or near urban areas but still possess the characteristics stated in paragraph 8.

should read thus:

Care must be taken in application of this ESS in urban/industrial/farming areas. Generally, it does not apply to individuals or small groups migrating to those areas in search of economic opportunity. It may apply, however, where Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities have established distinct communities in or near those areas but still possess the characteristics stated in paragraph 8.

Page 6, GN9.1:

The phrase “during the lifetime of members of the community or group” introduces a temporal limitation on claims to collective attachment. This means that claims regarding loss of collective attachment that exceed that temporal limitation, which are often complex and can be traced back many years before the lifetime of the members of the community, fall outside the scope of Paragraph 9.

Our comment:

What treatments would be applied to those who lost their *attachments*, defined as limited to the attachment thus “during the lifetime of members of the community or group”, to a certain land? Given a relatively short life expectancy of indigenous individuals, this clause is extremely limiting. Our opinion is that no temporal limitation should be imposed.

Page 6, 10:

Following a determination by the World Bank that Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities are present in, or have collective attachment to the project area, the Borrower may be required to seek inputs

from appropriate specialists to meet the consultation, planning, or other requirements of this ESS. The World Bank may follow national processes during project screening for the identification, in accordance with paragraphs 8 and 9, of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (as they may be referred to in the national context), where these processes meet the requirements of this ESS ⁸.

should read thus:

*Following a determination by the World Bank that Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities are present in, or have collective attachment to the project area, the Borrower may be required to seek inputs from appropriate specialists, **as well as local and indigenous representatives**, to meet the consultation, planning, or other requirements of this ESS. The World Bank may follow national processes during project screening for the identification, in accordance with paragraphs 8 and 9, of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (as they may be referred to in the national context), where these processes meet the requirements of this ESS* ⁸.

Our comment:

This is of absolute importance to include indigenous as well as local community representatives in the team of experts.

Page 6, Footnote 8:

*In conducting this screening, the Bank may seek the technical advice of specialists with expertise on the social and cultural groups in the project area. **The Bank will also consult the Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities concerned and the Borrower.** See paragraph 54 in the World Bank Environmental and Social Policy for Investment Project Financing.*

Our comment:

They should be treated as experts, in our opinion, and not be consulted separately from the experts mentioned here.

Page 6, GN10.1:

The engagement of appropriate specialists to provide technical advice and assistance regarding application of ESS7 is important, for example when there are circumstances or vulnerabilities of IP/SSAHUTLC, or national legislation and general socio-economic data only provide general information rather than specific data regarding the groups that may be present. **The specialists should have proven familiarity with social science research methods, extensive knowledge and working experience with the subject of IP/SSAHUTLC in the country or region.** Projects affecting IP/SSAHUTLC may also benefit from ongoing input from appropriate specialists, for example, in assisting the Borrower to better understand the characteristics, issues and priorities of the IP/SSAHUTLC, their governance structures and decision making processes.

Our comment:

IP/SSAHUTLC should be treated as experts, in our opinion, and not be consulted separately from the experts mentioned here.

Page 7, 11:

*A key purpose of this ESS is to ensure that Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities present in, or with collective attachment to, the project area are fully consulted about, and **have opportunities to actively participate in**, project design and the determination of project implementation arrangements. The scope and scale of consultation, as well as subsequent project planning and documentation processes, will be proportionate to the scope and scale of potential project risks and impacts as they may affect Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities*

Our comment:

The phrase 'actively participate in' (marked red) is problematic. IP/SSAHUTLC need to be recognized as decision makers rather than

actively participants, not only on implementation, but also on aims and objectives.

Page 8, 15:

When Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities are the sole, or the overwhelming majority of, project beneficiaries, the elements of the plan may be included in the overall project design, and preparation of a stand-alone Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities plan is not necessary.

Our comment:

In this case, a stand-alone plan needs to be implemented, because, as the draft rightly points out, right, needs and requirements of the indigenous groups are not only multifaceted in relation to individual contexts in which they arise but they are *always changing*.

Page 8, GN15.1:

The projects in Paragraphs 14-15 are specifically designed to benefit only IP/SSAHUTLC and may include health and education projects or community-driven development projects that are focused solely on IP/SSAHUTLC. In such cases, the Borrower may either prepare a stand-alone IP/SSAHUTLC Plan or incorporate elements of such a plan, including cultural appropriateness of proposed services or facilities and arrangements for monitoring and evaluation, into the overall project design and documentation. A stand-alone IP/SSAHUTLC Plan may be prepared instead, if preferred. It is important to apply the requirements of ESS7, including undertaking a targeted social assessment, and to conduct appropriate consultations with affected IP/SSAHUTLC.

Our comment:

In all cases mentioned, a stand-alone plan needs to be implemented from the reason stated above.

Page 9, GN17.1:

In some projects, affected groups of IP/SSAHUTLC may exist in the same area as other affected communities or they may be integrated within a larger affected population. In such cases, a stand-alone IP/SSAHUTLC Plan can be prepared, or all elements of this plan can be included as part of a broader integrated community development plan. Issues related to IP/SSAHUTLC are addressed in project design to provide equitable access to project benefits in a culturally appropriate manner.

Our comment:

In all cases mentioned, a stand-alone plan needs to be implemented from the reason stated above.

Pages 10~11, 22:

Various factors including, but not limited to, the nature of the project, the project context and the vulnerability of affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities will determine how affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities will benefit from the project. Identified opportunities will aim to address the goals and preferences of the affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, including improving their standard of living and livelihoods in a culturally appropriate manner, and to foster the long-term sustainability of the natural resources on which they depend.

should read thus:

*Various factors including, but not limited to, the nature of the project, the project context and the vulnerability of affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities will determine how affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities will benefit from the project. Identified opportunities will aim to address the goals and preferences of the affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, including improving their standard of living and livelihoods in a culturally **and politically** appropriate manner, and to foster the*

long-term sustainability of the natural resources on which they depend.

Our comment:

They are often involved in political processes and/or struggles, and their participation should not have adverse effects on them.

Page 11, G22.1:

While ESS7 applies irrespective of the presence or absence of discernible economic, political, or social vulnerabilities, the nature and extent of vulnerability is a key variable in designing plans to promote access to benefits or measures to mitigate adverse impacts on IP/SSAHUTLC. It is important to include factors such as IP/SSAHUTLC' economic, social, and legal status; their institutions, customs, culture, and/or language; their dependence on natural resources; and their past and ongoing relationship to other groups in the area, in an analysis of vulnerability. Consultations with IP/SSAHUTLC can support this analysis and help in identifying their preferences regarding both project benefits and mitigation measures. Consultations are carried out with IP/SSAHUTLC, and their preferences are taken into account while designing measures intended to help benefit them.

should read thus:

While ESS7 applies irrespective of the presence or absence of discernible economic, political, or social vulnerabilities, the nature and extent of vulnerability is a key variable in designing plans to promote access to benefits or measures to mitigate adverse impacts on IP/SSAHUTLC. It is important to include factors such as IP/SSAHUTLC' economic, social, **political(*1)** and legal status; their institutions, customs, culture, and/or language; their dependence on natural and **spiritual (*2)** resources; and their past and ongoing relationship to other groups in the area, in an analysis of vulnerability. Consultations with IP/SSAHUTLC can support this analysis and help in identifying their preferences regarding both

project benefits and mitigation measures. Consultations are carried out with IP/SSAHUTLC, and their preferences are taken into account while designing measures intended to help benefit them.

Our comments:

*1 The term should be added from the same reason given above.

*2 Natural resources almost all the time are imbued with spiritual/symbolic meanings for them. And many other items/features of nature are used as symbolic resources for them and are of vital importance for their wellbeing.

Page 11, GN23.1 (a):

Begins early in the project planning process to gather initial views on the project proposal and inform project design;

should read thus:

Taking place at the initial stage in the project planning process to gather initial views on the project proposal and inform project design;

Our comment:

Indigenous rights are what need to be most respected and consultation should mark the beginning of the whole process.

Page 12, GN23.1 (d):

Is based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s) and understandable to stakeholders;

should read thus:

Is based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally and politically appropriate format, in relevant local language(s) and understandable to stakeholders;

Our comment:

Many of the defined groups are also involved in political processes and/or struggles.

Page 12, 23:

Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities may be particularly vulnerable to the loss of, alienation from or exploitation of their land and access to natural and cultural resources. In recognition of this vulnerability, in addition to the General Requirements of this ESS (Section A) and those set out in ESSs 1 and 10, the Borrower will obtain the FPIC of the affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in accordance with paragraphs 25 and 26 in circumstances in which the project will:

- (a) have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation;*
- (b) cause relocation of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities from land and natural resources subject to traditional ownership or under customary use or occupation; or*
- (c) have significant impacts on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' lives.*

In these circumstances, the Borrower will engage independent specialists to assist in the

identification of the project risks and impacts.

should read thus:

*Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities may be particularly vulnerable to the loss of, alienation from or exploitation of their land and **landscape** and access to natural, cultural and **spiritual** resources. In recognition of this vulnerability, in addition to the General Requirements of this ESS (Section A) and those set out in ESSs 1 and 10, the Borrower will obtain the FPIC of the affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in accordance with paragraphs 25 and 26 in circumstances in which the project will:*

- (d) have adverse impacts on land, **landscape**, natural, **cultural and spiritual** resources subject to traditional ownership or under customary use or occupation;*
- (e) cause relocation of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities from land, **landscape**, natural and **spiritual** resources subject to traditional ownership or under customary use or occupation; or*
- (f) have significant impacts on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' lives.*

In these circumstances, the Borrower will engage independent specialists to assist in the identification of the project risks and impacts.

Our comment:

The vital importance of landscape and spiritual resources for the identities and lifeways of IP/SSAHUTLC are widely recognised and should be clearly stated as such.

Page 13, GN24.1:

The specialists referred to in Paragraph 24 of ESS7 should have significant experience in issues of concern to IP/SSAHUTLC.

should be read thus:

The specialists referred to in Paragraph 24 of ESS7 should have significant experience in issues of concern to IP/SSAHUTLC, **and should include indigenous representatives.**

Our comment:

Obviously the indigenous individuals are the foremost experts of their lifeways!

Page 13, 25(d):

FPIC does not require unanimity and may be achieved even when individuals or groups within or among affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities explicitly disagree.

should be read thus:

*FPIC does not require unanimity and may be achieved even when individuals or groups within or among affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities explicitly disagree, **provided mechanisms are in place where the overruled party can state their disputing views on the project and the procedure of the consultation.***

Pages 13~14, GN25.2:

Particular attention should be given to groups within affected IP/SSAHUTLC who may be vulnerable, such as women, youth, the poor and persons with disabilities. Addressing any limitations on their participation in the FPIC process helps to ensure that their interests and concerns are adequately considered and addressed as part of the process to establish FPIC.

should read thus:

Particular attention should be given to groups within affected IP/SSAHUTLC who may be vulnerable, such as women, youth, **LGBT**, the poor and persons with disabilities. Addressing any limitations on their participation in the FPIC process helps to ensure that their interests and concerns are adequately considered and addressed as part of the process to establish FPIC.

Page 14, GN25.3:

Good faith negotiation involves, on the part of all parties:

- (a) Willingness to engage in a process and availability to meet at reasonable times and frequency;
- (b) Sharing of information necessary for informed negotiation;
- (c) Use of mutually acceptable procedures for negotiation;
- (d) Willingness to change initial positions and modify offers where possible; and

Provision of sufficient time for the process.

should be read thus:

Good faith negotiation involves, on the part of all parties:

- (a) Willingness to engage in a process and availability to meet at reasonable times and frequency, **determined by the IP/SSAHUTLC in the first place;**
- (b) Sharing of information necessary for informed negotiation;

- (c) Use of mutually acceptable procedures for negotiation, **respecting utmost IP/SSAHUTLC's preferences;**
- (d) Willingness to change initial positions and modify offers where possible, **respecting utmost IP/SSAHUTLC's preferences;** and
- (e) Provision of sufficient time for the process, **taking as long as necessary for the IP/SSAHUTLC to complete their traditional procedure.**

Our comment:

The prioritization of the will of IP/SSAHUTLC is the prerequisite for any project of this kind!

Page 14, 25.4:

The Borrower informs the Bank of the process that has been agreed upon for good faith negotiation on FPIC. Where there is disagreement on what constitutes an appropriate engagement process, or an agreement cannot be reached, the Borrower will seek advice from an independent specialist as required in Paragraph 24 of ESS7.

should be read thus:

The Borrower informs the Bank of the process that has been agreed upon for good faith negotiation on FPIC. Where there is disagreement on what constitutes an appropriate engagement process, or an agreement cannot be reached, the Borrower will seek advice from an independent specialist, **including indigenous representatives**, as required in Paragraph 24 of ESS7.

Our comment:

As stated above, obviously indigenous individuals are the foremost experts of the own lifeways!

Pages 14~15, GN27.1:

If FPIC cannot be ascertained by the Bank, the project design will be adjusted to eliminate the aspects of the project relevant to the affected IP/SSAHUTLC. For example, if affected communities of IP/SSAHUTLC do not provide their FPIC to the proposed construction of a new road through their land, the project may, depending on circumstances, consider rerouting the road to avoid acquisition of the land or physical displacement of the communities. In such cases, measures included in the IP/SSAHUTLC Plan help avoid any adverse impacts on the communities.

should be read thus:

If FPIC cannot be ascertained by the Bank, the project design will be adjusted to eliminate the aspects of the project relevant to the affected IP/SSAHUTLC. For example, if affected communities of IP/SSAHUTLC do not provide their FPIC to the proposed construction of a new road through their land, the project **should** consider rerouting the road to avoid acquisition of the land or physical displacement of the communities. In such cases, measures included in the IP/SSAHUTLC Plan help avoid any adverse impacts on the communities.

Our comment:

Not 'may' but 'should', simply because the indigenous parties recognize the project not to be for the enhancement of their wellbeing. Otherwise, the sentence contradicts to Paragraph 28, stating: *During implementation, the Borrower will ensure that necessary actions are taken, and agreed benefits or improvements to services are delivered, so as to maintain Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' support for the project.*

Page 15, 28:

Agreements reached between the Borrower and affected Indigenous

Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities will be described, and actions necessary to accomplish agreements will be included, in the ESCP. During implementation, the Borrower will ensure that necessary actions are taken, and agreed benefits or improvements to services are delivered, so as to maintain Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' support for the project.

should read thus:

Agreements reached between the Borrower and affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities will be described, and actions necessary to accomplish agreements will be included, in the ESCP. During implementation, the Borrower will ensure that necessary actions are taken, agreed benefits or improvements to services are delivered, and, if at all possible, the disagreements at the initial stage of the implementation to be addressed and brought to an agreement, so as to maintain Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' support for the project.

Page 15, 29, First sentences:

Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities are often closely tied to their land and related natural resources.¹⁵ Frequently, land is traditionally owned or under customary use or occupation. While Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities may not possess legal title to land as defined by national law, their use of the land, including seasonal or cyclical use, for their livelihoods, or for cultural, ceremonial, and spiritual purposes that define their identity and community, can often be substantiated and documented.

should read thus:

Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities are often closely tied to their land, landscape and related natural and spiritual resources.¹⁵ Frequently, land and certain landscape views/vistas are

traditionally owned or under customary use or occupation. While Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities may not possess legal title to land as defined by national law, their use of the land, including seasonal or cyclical use, for their livelihoods, or for cultural, ceremonial, and spiritual purposes that define their identity and community, can often be substantiated and documented.

Our comments:

Landscape and its features imbued with symbolic-ancestral-mythological meanings should be recognized as owned by the concerned indigenous people.

Page 15, Footnote 15:

Examples include marine and aquatic resources, timber and non-timber forest products, medicinal plants, hunting and gathering grounds, and grazing and cropping areas.

should read thus:

*Examples include marine and aquatic resources, timber and non-timber forest products, medicinal plants, hunting and gathering grounds, **ancestral-mythological landscapes, landscape features and vistas**, and grazing and cropping areas.*

Page 18, GN33.3:

The use of IP/SSAHUTLC names, photographs, and other items depicting them and the environment in which they live can be sensitive in many situations. It is important to assess local norms and preferences, and consult with the relevant communities before using such items, for example, when naming project sites or specific infrastructure.

should reads thus:

The use of IP/SSAHUTLC names, photographs, and other items depicting them and the environment in which they live can be sensitive in many

situations. It is important to assess local norms and preferences, consult with the relevant communities before using such items, for example, when naming project sites or specific infrastructure. **The project has to obtain full consent from the IP/SSAHUTLC before using such items, for example, when naming project sites or specific infrastructure.**