

**World Bank Group Cover Note**  
**Archaeology Noncompliance/Cameroon**  
**“Results of Special ECMG Mission to Evaluate Three Archaeological Sites in Cameroon”**

In its recent report, (April 22, 2003), the External Compliance Monitoring Group (ECMG) has cited instances of noncompliance with the project’s Environmental Management Plan (EMP) related to the management of archaeological property in Cameroon. During its January 2003 mission, ECMG found that two sites were no longer in the originally observed location within the right-of-way: a rock shelter and a rock feature identified as a megalithic monument. These sites had been identified well in advance of construction activities. In addition, treatment of a third site, encountered during construction, was found to be inadequate.

A special mission to Cameroon was undertaken in March 2003 by the ECMG and a World Bank Group representative to follow up on these archaeological issues. This mission confirmed these instances of noncompliance and noted systemic problems with the management cultural property in Cameroon.

The World Bank Group has determined that an apparent systemic lack of avoidance, which led to the above-cited events, constitutes a Level III noncompliance with the EMP in two of the three above-cited instances. Upon further investigation, the megalithic monument was determined to be a natural feature (protruding bedrock). A Level III noncompliance event is defined as a critical noncompliance situation, typically including observed damage to a specifically protected sensitive resource or a reasonable expectation of impending damage.

In light of the actual level of substantive damage or loss of archaeological information, and according to the EMP and other legal obligations, COTCO, the project company must develop and implement an acceptable cure or mitigation. COTCO is committed to do so in collaboration with the Government of Cameroon. COTCO has made firm commitments to a three-part mitigation program. First, COTCO will finance the production of a comprehensive scientific report which summarizes the findings and opportunities for future archaeological research in the regions traversed by the pipeline. This report will be peer reviewed locally and internationally. In addition, an archaeological conference will be held in Cameroon. Second, COTCO will provide funding to support doctoral studies of Cameroonian archaeologists, including assistance with further salvage and analysis of propitious sites discovered during pipeline construction. Third, financing will be provided to the Ministry of Culture for establishment of a curation facility, needed to support future archaeological work in the country.

The project has accumulated an unprecedented amount of knowledge and opened possibilities for future archaeological research in central Africa. The World Bank Group views the mitigation program as appropriate. The mitigation program will further enhance the potential for archaeological research in the region by building educational and research capacity. Moreover, the mitigation program will build general awareness of the significance of cultural property in Cameroon.