The Ilisu Dam: A Monument to Barbarism

A Review of the *Environmental Impact Assessment Report Update* for the Ilisu Dam in the Kurdish Region of Turkey

by

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In consultation with

Grassroots communities from the reservoir area &

The Global Women's Strike

Cover Photo: The empty village of Çattepe, evacuated and destroyed by the Turkish security forces in the 1990s, now threatened by the Ilisu dam. It sits on top of an ancient mound part of which was an important fort on the Roman empire's frontier. Photo: M. Ronayne

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Contents

Chapters and Sections

Summary & Recommendations		
1. Introduction & Methodology	23	
2. How Impact Assessment Became Project Promotion	27	
This Impact Assessment is not an Assessment	28	
The EIAR Update is not an Independent Assessment	30	
Grassroots Communities, Beginning with Women, the Main Carers, Will Not Benefit, Are Not Involved and Are Not Being Consulted Or Informed Adequately	32	
Inadequate consultation with women Failure to consult with those displaced by conflict Inadequate consultation in Hasankeyf Inadequate consultation by companies & government ECAs	34 37 38 39	
Key Project Issues Separated and Taken Out of Context	40	
Problems with the GAP Project and War in the Region Not Assessed	41	
No critical review of GAP and DSİ Inaccurate and censored account of conflict in the region	41 45	
3. The Culture of Caring and How the Ilisu Dam Would Destroy It	50	
Little Assessment of Culture and Heritage	51	
The Sources the EIAR Update Relies On Are Seriously Flawed	53	
Devastating Impacts on Culture and Heritage of Communities	56	

How women's caring work has framed the society's culture, how the Ilisu dam would undermine caring and thus undermine culture	57
Forcing people off the land: why cultural heritage and resettlement must be considered together	71
How not to do land surveys: setting families and communities against each other by measuring culture to suit the market	76
Roots and routes: cutting off communities Using displacement as a weapon to destroy grassroots rural culture and	78
therefore cohesion and resistance	79
Culture of Killing: Ilısu, War and Cultural Heritage	83
The Dam As Ethnic Cleansing: Failure to Assess Impacts on the Diversity of Culture and Heritage	87
Kurdish, Armenian, Arab and Turkish – diverse heritage ignored Hasankeyf: failure to assess significance	87 90
No Assessment of Impacts on Religious Heritage	94
At War in the Garden of Eden: Destructive Impacts on Ancient Heritage	96
How the dam would destroy the world's garden:	
the beginning of agriculture	97
Flooding our human origins in the Middle East	101
Caves and cave art	102
Imperial plunder: how lessons from ancient empires are not being learned	103
Cultural Heritage Includes the Entire Landscape:	
This Cannot Be 'Salvaged' in Advance of the Dam	107
Cultural landscapes	107
Natural heritage	108

4.Treasure Hunts & Human Exhibits: Why Salvage Plans for Ilisu Cannot Save Culture	110
No Adequate Mitigation Measures for Cultural Heritage	111
No plans to deal with many of the cultural impacts on the communities Precise numbers of archaeological sites affected still unknown	112
but already in the thousands	115
Plans for survey inadequate	117
Inadequate salvage excavation plans Timescale and personnel requirements for	120
the salvage plans are unrealistic	121
Inadequate budget for salvage plans	123
Problems with TAÇDAM, the Ministry of Culture	
and the management of the salvage projects	125
An Unmitigated Disaster: Salvaging Hasankeyf Will Not Save It	128
Ilisu's Cultural Heritage Parks: Turning Communities and Artefacts into Exhibits	131
Many Guidelines, Laws and Professional Standards Broken	133
5. Conclusion	135
References	138
Appendices	146
1 Tochnical Notes on the EIAD Undate	147
 Technical Notes on the EIAR Update Some Problems with the Resettlement Action Plan Update 	156
3. The Kurdish People As Indigenous People: World Bank	150
Guidelines	159
Text Boxes	
 An Impact Assessor Blows the Whistle on the Ilisu EIAR Literacy, Schooling and Language: Vital Issues 	29
Ignored in Consultation	33
 Comments By Women Villagers on the RAP Update Survey 	35 35
 Update from Women Villagers 2006 	36
	30 41
•	41
Many Dams But No Clean, Accessible Water CAR Spending Reveals True Repositions	
 GAP Spending Reveals True Beneficiaries Continuing Conflict in the Kurdish Region 	45
	46

•	Reliance on Flawed and Incomplete Archaeological Surveys	54
•	Why Proposed Benefits of the Dam Are a Sham	61
•	Women's Poverty Must Not Be Used to Justify the Ilisu Dam	63
•	Training and Income Generation: A Recipe for Keeping	
	the Grassroots in Poverty	66
•	Counting Women's Work – Counting Culture	68
•	NGOs and Political Parties: The 'Partners' of Developers?	75
•	Significance Assessment – Another Basic Standard Ignored	85
•	The Kurds As Indigenous People	93
•	Destroying the World's Seed Bank	98

List of Illustrations

1. Cover Photo: The empty village of Çattepe, evacuated and destroyed by the Turkish security forces in the 1990s, now threatened by the Ilisu dam. It sits on top of an ancient mound part of which was an important fort on the Roman empire's frontier. Photo: M. Ronayne

Abbreviations

EIAR Update: Environmental Impact Assessment Update for the Ilisu Dam and Hydroelectric Power Plant.

IEG: Ilisu Environment Group – the authors of the EIAR report and Update. They are the group of companies commissioned by the Ilisu consortium to undertake the environmental impact assessment - Hydro Concepts Engineering, Hydro-Québec International and Archéotec Inc.

RAP Update: Resettlement Action Plan Update for the Ilisu Dam compiled by Encon, environmental consultants retained by the DSI (State Water Agency of Turkey).

The consortium: the new group of companies who have come together to build the Ilisu dam. They are led by VA Tech (Austria, currently for sale) and at the time of writing also include Alstom (Switzerland), Stucky Ltd (Switzerland), Züblin (Germany) and Turkish construction firms Nurol, Cengiz, Temelsu and Celikler.

A Note on Archaeological Dating Conventions and Referencing

The letters BCE and CE refer to the same time periods as BC (Before Christ) and AD (Anno Domini – In the Year of Our Lord) and the former will be used in this report. BCE stands for Before Common Era and CE for Common Era. IEG also sometimes use BP, which stands for Before Present.

Page numbers e.g. (3-60) refer to pages in the EIAR Update unless otherwise stated.

Summary & Recommendations

The Ilisu dam is a hydroelectric project planned for the river Tigris in the Kurdish Southeast of Turkey and would create a reservoir of over 300 km²; it is the lynch-pin in a series of dams on the Tigris which are part of the giant Southeast Anatolia Development Project (Turkish acronym GAP). According to the EIAR Update (4-119), the cost of the Project is 1.8 billion euros (3.0 billion YTL) though in reality this is an underestimate. Close to 78,000 villagers would be displaced (the Update says less but its figures are flawed), it would cause environmental pollution, reduce water flow to downstream communities in Iraq and Syria and result in immense cultural destruction. Plans for the dam were first put forward decades ago but since the first consortium of companies emerged at the end of the 1990s, affected communities, their organisations and other campaigners (mainly in the EU) have been fighting it with several notable victories along the way.

No government or lending institution can reasonably decide to grant cover for the Ilisu dam on the basis of this EIAR Update. The reasons include:

The EIAR Update Is Not An Assessment

- The EIAR Update is not an independent assessment of project impacts. It is forced to rely on data collected by the Turkish authorities, does not carry out independent checks on that information and frequently sounds more like a promotion brochure for the project and for government policy.
- Much of the Update is not actually an assessment: it is lacking in the
 most basic data on potentially life-threatening impacts and very little
 fieldwork was done for it; its authors are often reduced to suggesting
 that impacts on communities ought to be assessed and measured
 rather than being in a position to do so themselves.
- It is superficial window-dressing of old information from the discredited 2001 assessment. On the subject of cultural impacts and women it borrows heavily from a critique of the 2001 EIAR by this author and Dr W.H. Kitchen and subsequent work; these reviews should be examined again by potential funders of IIIsu since most of the problems the reviews identified are also true of the Update.
- The project and its documents show a clear failure to consult adequately or inform all sectors of the affected communities, particularly women, those displaced by war, residents of Hasankeyf, nomads and seasonal agricultural workers; project officials and governments appear to regard consulting with NGOs and professionals as the equivalent of consulting with and involving the grassroots communities who are directly affected, which is not the case.

- Project issues are separated and taken out of context; for example, there is no critical review of the GAP development project of which Ilisu forms part or of international tensions over use of the Tigris waters.
- Though continuing torture and other repression, escalating conflict in the area and war in the Middle East, are the context within which people are being consulted about the dam, these are not seriously considered in the Update.
- The assessment team clearly did not have the resources and the permission to carry out a proper assessment or update yet went ahead anyway. This undermines their professional competence and discredits the results.

An impact assessor involved as a possible team leader for the Ilisu EIA in the 1990s has come forward to say why he withdrew:

I was involved with the Ilisu EIA in April and May 1997 as a possible team leader, before pulling out when the farcical nature of the whole process became apparent. The Swiss-German engineer responsible at that time for putting together the environmental team for the international EIA made it clear that resources and permission for credible fieldwork and consultation would not be forthcoming, and that the EIA would not have any significant effect on the project, which would go ahead with or without impact assessment.

- James Ramsay CEnv (by email to M. Ronayne)¹

Failure to Properly Assess Impacts On Culture and Heritage

- Basic information not available regarding many of the most severe and life-threatening cultural impacts on communities.
- IEG failed to gather any substantial baseline data on cultural heritage themselves.
- Sources the EIAR Update relies on for information are seriously flawed.
- No in-depth assessment of the significance of culture and heritage in the reservoir area to whom it is important and why.
- Demeaning and rendering invisible the culture and heritage of grassroots rural people and their connection to the land, beginning with women and their cultural work to ensure everyone's survival.
- Distortion and denial of the ethnic and other diversity of culture and heritage in the reservoir area.

¹ Emails of 22nd February 2006 and 1st June 2006.

- Failure to assess religious heritage and threat to accessing holy sites.
- No proper assessment or detailed, costed plans to deal with cumulative impacts on cultural heritage, downstream impacts or impacts on sites and culture resulting from work associated with the dam e.g. construction, quarries, roadworks, building of new villages for resettled families.
- No assessment of alternative project designs and different energy projects for cultural heritage impacts.

Destroying the Culture of Caring: The Dam Does Not Benefit Women; Rather, It Targets Women & All In Their Care

Women in the IIIsu reservoir area – as elsewhere - are the main carers for their families and communities:

Caring for others is accomplished by a dazzling array of skills in an endless variety of circumstances. As well as cooking, shopping, cleaning and laundering, planting, tending and harvesting for others, women comfort and guide, nurse and teach, arrange and advise, discipline and encourage, fight for and pacify. Taxing and exhausting under any circumstances, this service work, this emotional housework, is done both inside and outside the home. And we are the first to defend those in our care. It is usually women — mothers, wives, partners, sisters, daughters, grannies and aunties — who are the driving force of justice campaigns, whether or not we are prominent or even visible in them.

Selma James
 Co-ordinator of the Global Women's Strike
 (Journal of the Global Women's Strike 3 2006, 1).

In this way women make a fundamental contribution to culture ensuring the survival of the whole society and enabling economic and emotional relationships, which are the essence of culture. Without this work and the connections women enable between people culture would simply not exist and none of us could survive physically or emotionally. I have called this the culture of caring (Ronayne 2006a and 2006b). Women are therefore central protagonists in the community holding it all together. As a result, it is not possible for anyone to evaluate a community and the impact of a dam on them without assessing and valuing what women do to protect that community and ensure its survival. It follows that if women and the caring work they do are dismissed and thus undermined and potentially destroyed, the community will be destroyed. This is the greatest cultural destruction the dam would do.

Yet there is no account in the EIAR Update of women's contribution to culture, past or present, making it all the easier to dismiss and displace whole communities; nor any acknowledgement that archaeologists and anthropologists cannot save it by salvage projects.

GAP claims to be a project for women's development. In reviewing development projects I follow the direction given by women lifting themselves out of poverty and others working with them:

In Venezuela, as almost everywhere else in the world, poverty has a woman's face. We had determined that if the problem of poverty was to be tackled it was necessary to invest in women because this was the only way we could overcome poverty.

 Professor Nora Castañeda Economist & President of Venezuela's Women's Development Bank (Banmujer) (Castañeda and López 2006, 52).

So because the majority of those living in poverty everywhere are women, if a development programme claims to tackle poverty as GAP does, to find out if it works, the first people to ask are grassroots women. The UN Development Programme highlighted GAP as a showcase programme for women's development over the last few years² and, according to IEG, is funding projects linked to GAP. In fact, the Ilisu dam and GAP are an attack on women, on all those in their care and on the culture of caring they have created and maintained for generations.

- Women in the area have a heavy workload on the land as well as in their homes and villages; their poverty and the war add greatly to this burden. The Update hides the extent of poverty in the reservoir area and the ways in which it would get worse if the dam came; especially how it would increase women's poverty making it harder to maintain the culture of caring.
- The communities' lack of access to clean water and health care as well as the struggle to ensure food security are discussed below in this review as examples of how heavy is women's workload now but how much worse it would be if the dam went ahead. There are no substantial plans to deal with health care among affected communities and it is women who would have to take care of the sick or beg for food; the situation could easily result in the deaths of children in particular.
- The division of labour in affected communities is not examined in the Update nor is there full assessment of specific issues that dam builders have failed to address in consultation processes such as language, illiteracy, lack of schooling and the extra struggle women face as Kurdish women in a war zone.

² See Ronayne 2002 and Ronayne 2005 for documentation.

- Women's work, views and demands are not considered in assessing impacts or for compensation. Women say: 'our question is: will it be harmful to us?' But they have not received a truthful answer and the proposed local benefits of the dam are a sham. Even the electricity generated does not seem to be intended for local use.
- The EIAR Update relies heavily on the RAP surveys but evidence is presented here from women villagers who discredit the RAP surveys on several counts including misrepresentation of their views, lack of clarity regarding the purpose of the questionnaires, references to jobs for their daughters with no evidence that this would happen and payment of students who undertook the survey per questionnaire – resulting in their failure to give women adequate time to answer questions regarding the most serious impacts.

Women villagers comment in this review that as of July 2006 they have not been informed or consulted about the EIAR and RAP Updates. A spokeswoman in Suçeken (Kurdish name Şikefta) village added:

They are lying aren't they? People here hope for money and better living conditions but the government doesn't give money to people here. Women don't want the dam. We don't want to go anywhere. Our village is very beautiful; it is like heaven. It is our history. They want to destroy our history. Women are against the dam.

- Proposals that women 'may' be compensated via the land surveys or through income generation and training are dangerously misleading.
 - Women's poverty, resulting lack of social power and the forces ranged against them starting with the military mean they would not be able to hold money or title deeds even if the authorities gave them directly to women (very unlikely). Or there would be conflicts within families and an increase in domestic violence.
 - According to grassroots women's organisations '[w]e knew that micro-credits and income generation projects usually avoid serious change aimed at ending women's poverty. They may often be better than nothing, but they keep you poor and riveted to endless overwork, while the project staff are well paid for "helping the poor" (James in Castaňeda and López 2006, 8).
- The methodologies of the RAP survey and EIAR Update were designed to present women as victims and use their poverty, the considerable violence against them and a superficial 'women's rights' case to make a way for the dam. Using women in this way is an act of barbarism, not a mark of civilisation.

In answer to this misrepresentation of women's views and demands, a spokeswoman for village women consulted on this review said: 'They are speaking by themselves and for themselves. These are not our

thoughts. Yes we are poor and have many problems. But I am not sure that the dam will solve these problems.'

- It has been a struggle to get women's work and therefore their demands made visible in project documents but now that women are mentioned they are treated at best as an object of study, which demeans their contribution.
- Before any project could go ahead the war 'the main reason for our poverty' according to village women - must end and women's contribution past and present must be recognised, their work counted and valued.

In this review, comparisons are drawn with Venezuela where oil wealth is being returned to communities, women's unwaged work is valued in the Constitution and beginning to be paid for, a State bank is dedicated to investing in poor women, and land surveys and re-distribution of land are led by grassroots women backed by a law that prioritises womanheaded households.

Forcing People From the Land and the Destruction of Subsistence Agriculture: Highland Clearances for the 21st Century

It is not an exaggeration to say that to remove people from the land, from the means to grow food to keep families alive and at the same time cutting them off from their history, from the knowledge needed to survive and from their cultural and sacred places, is life threatening. No map, no dig can salvage this.

- Although the project is supposed to offer rural communities new land if
 they face displacement, it does not do this; the Update claims there is a
 scarcity of land to offer people and seems to blame villagers
 themselves for not 'choosing' this option when in fact many if not most
 would prefer it but do not trust the State because of their experience
 with previous projects. The real problem, land distribution, is
 unaddressed, with ownership of almost all the land vested in just 25
 landlords.
- Land surveys in advance of the dam would only result in further conflict because they set formal boundaries to informal practices and agreements and are not community led or for the benefit of communities. They represent a change for the worse in relationships within communities, among families and between people and the land a shift from caring for the land to the priority of the market, impoverishing people and setting them against one another.
- The proposals to deal with communities already displaced from their villages by war are particularly shocking:

- The Update suggests the authorities have done everything to find these villagers, which is not the case; project officials may look no further but take people's land without clarifying use or ownership.
- It is also proposed that the dam could act as a means for such families to get compensation instead of justice and the right to return to the villages they were forced out of – which must be questionable legally.
- The authorities may be preventing people from returning to villages they were evacuated from during the 1990s even though the dam is not yet going ahead. The impact assessment does not investigate this.
- Some families already displaced by war who have returned to their villages may be ousted for a second time as might families already displaced by Batman dam to the Ilisu area.
- The Indigenous movement has made a powerful case that cultural as much as physical nourishment is the basis for survival and resistance in contrast to what is being imposed. This case has been ignored in the Update. People in the reservoir area oppose the project because of the immediate threat to their lives and well-being, but they also know their history is a power for them including traditional knowledge, evacuated villages, cemeteries, pilgrimage and other holy sites and Hasankeyf.
- The Update is dismissive of grassroots people and their culture, especially rural people and their connection to the land, demeaning them and rendering their culture invisible. It (the RAP even more so) presents the dam as progress and modernity using women to justify the demeaning of tradition. While women would be the first to say that not everything traditional is good, it is not helpful to use their case to dismiss the knowledge and culture of generations as so many irrational habits people cling on to.
- Racism is pervasive throughout the Update, particularly towards rural communities, including implying that the history of migration and forced displacement in this region means that communities are used to it and would not feel it so badly.

To sustain profits by implementing these highland clearances for the 21st century, GAP and the multi-national companies have found it necessary to ensure the destruction of subsistence agriculture and replace it with the commercialisation of water, land and all the resources of the area. This in turn means the forced displacement of people from the land and the destruction of culture and society in Southeast Turkey.

Failure to Properly Assess Ancient Heritage

The dam would submerge a substantial part of a region of key importance for our origin as a species – from early hominids to

Neanderthals to the first fully modern human beings, where agriculture first began, people first started living in towns and cities, empires started, where several religions began and medieval dynasties and modern empires have tried to rule. This is the world's garden and part of the sacred landscapes of several religions. IEG fail to properly highlight the international significance and spectacular nature of much of the evidence.

- Sites from the Neolithic (New Stone Age) in the Ilisu reservoir area would be of immense international importance and highly likely to contain evidence that radically changes current scientific understanding of how communities first invented agriculture and began living in villages.
- Genetic information from several agricultural plants, which were first domesticated in this region would be wiped out by the reservoir – potentially destroying a vital part of the world's seed bank.
- The assessment fails to present or explain the importance of evidence in the area for our understanding of ancient empires and their relevance for present day conflict in the Middle East. The area was at the frontier of several empires including Uruk, Urartu, Medes, Assyria, Rome and Byzantine with trading connections to Persia and southern Mesopotamia. The evidence includes many enormous mounds, monumental architecture, buried towns, fortresses, cemeteries and possible rich villa sites with floor mosaics such as those which came to international attention as they were hurriedly excavated at Zeugma in advance of the Birecik dam. This heritage alone would take decades and many millions to excavate.
- The town of Hasankeyf was an Assyrian settlement, Roman fortress, seat of a Christian bishopric and a centre of the medieval world in the Middle East. It was a seat of various medieval dynasties including the Kurdish Ayyubids and is of immense cultural importance to Kurdish people the world over.
- There are thousands of human-carved and natural caves in the reservoir area which could contain key evidence for our origin as a species, and spectacular cave paintings or engravings by huntergatherers from the Palaeolithic (Old Stone Age) potentially similar to those of the famous Lascaux cave in France. Many of the caves are still in use today.
- There is no assessment of impacts on religious heritage despite the fact that this area is part of the sacred landscapes of the Qur'an, the Torah and the Bible as well as practices pre-dating religions of the Book. For example, the land between the Tigris and the Euphrates is often referred to as the location of the Garden of Eden. Pilgrimage routes and Muslim holy sites as well as natural features forming part of

pre-Islamic religious rites, would be flooded by the dam, preventing people's practice of their religions.

- Cultural heritage is not only found at individual sites the entire landscape is a vital cultural and natural heritage and the product of thousands of years of work by communities tending and caring for it. It cannot be saved by salvage excavations or ethnographic studies.
- There is also a distinct trend in the EIAR to divorce this ancient and medieval heritage from the modern communities in the area. The purpose of such claims can only serve to diminish modern culture and society in the region and facilitate the dam.

In fact communities in the reservoir area today are the inheritors of the thousands of years of knowledge and working out how to live as human beings in villages together, how to survive from the land, how to build communities and how to oppose whatever is being imposed by empires and other elites. Women the carers, keeping families alive and maintaining communities for many generations, are the first inheritors of this survival knowledge.

The Dam As Ethnic Cleansing

In order to form an opinion about the significance of different aspects of culture and heritage in the reservoir area, the ethnic identification and heritage of the communities would have to be examined, especially because of the repression they have endured. The Update regularly distorts, omits and denies the diversity of culture and heritage in the area; in 2001 we described the dam as a form of ethnic cleansing in which governments and companies would be complicit, and the largest global organisation of archaeologists, the World Archaeological Congress, has also described it in this way (WAC 2001b).

- The Update displays censorship or self-censorship with regard to recent culture and heritage and cultural diversity.
- Potential evidence for the Armenian genocide, and centuries of other Armenian heritage in the reservoir area, is not mentioned.
- Medieval Kurdish heritage is omitted or glossed over.
- Important religious heritage is not discussed.
- No detailed, costed plans to address the heritage of the Arab population in Hasankeyf.
- Recent Kurdish heritage has not been assessed, as IEG admit.
- The possibility of graves of disappeared people lying in the reservoir area is not examined.
- No detailed, costed proposals regarding people's graveyards and consultation on them – one of their most tangible connections with the land and with their past - are put forward.
- No proposals regarding access to the evacuated villages are put forward.

• The discussion on social and cultural aspects of the dam is particularly superficial, with paragraphs on seemingly unconnected issues.

Affected communities are said to have little connection with the past when the argument is about displacing them and removing access to heritage; and the culture is 'just local' when it comes to examining the significance of sites and artefacts from recent times which would be submerged.

- It is well known that history and archaeology can be and have been used to justify repression and the theft of resources via demeaning, distorting, denying or rendering invisible the history of particular communities, particularly the history of people's refusal and rebellion against what is being imposed. Governments considering funding Ilisu must be aware of how they might be complicit in such abuse of historical truth; IEG's assessment doesn't provide that information.
- This failure demonstrates that the framework for this impact assessment and for the dam is the policy of the Turkish authorities towards the diversity of culture: denial, repression and assimilation.
- Any independent assessment would have to conclude that this situation means that it is not possible to get a clear picture of the cultural and social history of the reservoir area over the last 100 years let alone previous centuries. Any ethnographic surveys for Ilisu would simply perpetuate this distortion of history.

Survey and Salvage Plans Inadequate

Since most of the information needed to make an assessment of cultural impacts has not been gathered, the entire section of the EIAR Update on mitigation measures for cultural heritage makes no sense and cannot be taken seriously.

- There seem to be no plans to deal with many life-threatening cultural
 impacts including destruction of the culture of caring and women's
 specialised labour to ensure its survival, grassroots rural culture,
 evidence of our earliest human origins, religious heritage, cultural and
 natural landscapes and people's labour to care for them, Armenian
 heritage, Kurdish heritage, Arab heritage and more.
- The proposals that the Update and RAP make for archaeological surveys and salvage are inadequate technically, ethically and financially. The plans are incomplete, inaccurate, frequently unprofessional, misleading as to amount of work required and, overall, lack any clear rationale or strategy.
- Though the Update admits for the first time that consultation is required with communities before any investigation of the cultural heritage, there are no plans or budgets to do this.

- IEG ignore Turkish and international laws and standards on cultural heritage that provide obstacles to salvage operations and to the dam being built.
- Many of the proposals for salvage methods are shocking to read in a
 professional document. Archaeologists from the region have described
 such salvage as 'treasure hunting'. Even the head of excavations at
 Hasankeyf has spoken of how parts of the Master Plan (which he
 helped compile) won't work.
- Numbers of sites are not fully known but are already in the thousands;
 60-80% of the reservoir area has not even been surveyed for archaeological sites. IEG play with numbers and indulge in guesswork on budgets to hide impacts and reduce costs.
- The EIAR Update budget for cultural heritage mitigation, for both Hasankeyf and the wider reservoir area, is wildly underestimated, not detailed enough and omits many items; there cannot possibly be a realistic budget because there has been no full survey.
- The RAP budget is even more unrealistic, showing that the authorities have no intention of addressing most cultural impacts and plan to excavate parts of just 40 mounds and parts of Hasankeyf.
- Most of the \$30.5 million allocated to Hasankeyf is to go on moving a few monuments – an unacceptable plan in itself – and not on excavation. Throwing millions at the site can't resolve the problems in any case.
- The proposals of the EIAR and RAP are contrasted in this review with the excavation of one mound in central Turkey, Çatal Höyük, site of a renowned Neolithic village which is being excavated over 25 years at a cost of many millions and a team of hundreds. The 40 mounds proposed for salvage in the Ilisu reservoir area could all be Çatal Höyüks but there is no possibility they would be salvaged properly in a war zone without enough time, personnel or resources - seven-to-eight years with a team of five archaeologists and 15 workmen. If 25 years and millions of dollars is the standard, why is it not applied to every mound in the Ilisu area?
- There is not enough time to carry out a fraction of the flawed proposals made by the EIAR and RAP let alone deal with the true extent of cultural impacts.
- This is all provided affected communities were fully consulted and gave their permission. Many villagers do not want salvage excavations to proceed, especially those already displaced by war, and view them as facilitating the project going ahead.

- The Master Plan for Hasankeyf is inadequate, with potentially dangerous implications for the livelihoods of communities. The fact that it is illegal to flood the town is glossed over; residents are not involved or even consulted about the site for their new town; there are many problems with the salvage excavations which have no clear rationale; the plan for the cultural parks and museums is unacceptable technically; most of the heritage cannot be moved, and residents and campaigners are opposed to it.
- People have not been consulted about the cultural parks proposed for the new Hasankeyf and the Upper Town. The result of these plans would be to turn communities and artefacts into exhibits and enable a rampant tourist industry to impose increased poverty on residents.
- Despite the claim in the Update summary, there is no coherent plan for ethnographic studies or documenting the culture that communities value.
- No detailed budget is allocated to ethnographic studies nor is there
 detail on the funding for the restoration of displaced people's
 livelihoods, but millions seem to be available for salvage of ancient
 sites. So ancient artefacts and sites are valued over the lives of
 thousands of human beings alive and making culture in the reservoir
 area today.
- Seven to eight years is a wholly inadequate timeframe for such work even if communities approved, and many do not.
- 'Studying' affected communities while this destructive project is being imposed on them is never going to lead to an adequate knowledge much less preservation of the culture and heritage, but would simply record a fraction of soon-to-be-dead culture. This may provide a good archive for professionals to build their careers on but it has nothing to do with saving culture, including because of its vital value to local communities, and its survival value generally which would be lost forever.
- The ethnographic proposals including what topics to cover and what
 physical heritage to record have been put forward without consulting
 with women, children and men in the communities. They seem geared
 to making culture especially women's cultural work and grassroots
 rural culture sound at best like 'a decoration of daily life' (James 1986,
 5) and at worst an exhibition of 'the natives'.
- The various proposals for ethnographic studies and the heritage communities value, flout the most basic principles of the professions of anthropology and ethno-archaeology. The ethnographic studies, like the archaeological salvage, are geared to facilitating the dam going ahead. Cases of the use of anthropology over the last few centuries

for the assessment of populations in order to colonise, displace, experiment and impose projects on them are well known.

The Update is a study in how archaeology, anthropology, sociology, the law and other professions can be used to excuse and promote the destruction of communities and culture.

War in the Garden of Eden: Culture of War and Repression Not Considered

- The area is heavily militarised effectively a war zone; it is also close to the border of occupied Iraq. IEG fail to mention the impact of the conflict and wider war in the region on cultural heritage, the Ilisu salvage operations or the implications for people being 'consulted' in this context. They perpetuate obvious falsehoods about forced displacement during the war in the 1990s and attempt to normalise the present conflict despite the fact that affected communities see the dam and GAP as an extension of the war.
- The conflict and the threat people are under the military are in charge
 of cultural heritage in the area for example make it impossible for
 professionals assessing or implementing such a project to work to
 professional and ethical standards particularly regarding full
 consultation and involvement of all sectors of communities in decisionmaking. But professionals are expected to and are contravening these
 basic standards.
- Were archaeologists to carry out salvage work for the dam without the
 permission of villagers and backed up by the military, they would be
 behaving little better than the imperial bureaucrats of past empires who
 plundered native sites while dismissing and destroying the culture of
 the Indigenous population. Yet in the militarised landscape of the
 Kurdish region and with standards further eroded by the cultural
 pillage of Iraq that is what they are being asked to do.
- Even if such archaeologists individually oppose the cultural destruction llisu represents and know, as some have told me they know, that standards are not being maintained and vital issues such as potential mass graves are not being investigated, they feel unable to speak out for fear of losing their jobs and worse. It is a crime in Turkish law for archaeologists who are State officials to oppose or criticise the project publicly.
- The cultural destruction, particularly of holy sites and religious practice could well be seen as part of a wider war strategy by Western governments in the region, especially when their war in the Middle East is portrayed as a clash of civilisations. Governments should consider the implications of destroying Muslim heritage in particular as they receive requests to fund the Ilisu dam.

As the World Archaeological Congress has noted (2001a), no amount of time or money could salvage cultural heritage to an acceptable level in the circumstances prevailing in this region.

Many Guidelines, Standards and Laws Broken

- This EIAR Update report contravenes several internationally recognised standards on impact assessment including those IEG took as their guideline.
- The project contravenes a large number of international guidelines and laws; a count from 2001/2 of multiple breaches under 34 different categories remains valid.

No further studies are needed to know that this project is not viable. This dam will never be able to meet basic international standards and laws. Therefore, all project documents and assessments are bound to breach various standards and laws if they seek to justify it.

Conclusion

- Affected communities are not protagonists in this 'development' but are its targets, their lives and culture worth nothing to the market but everything to humanity.
- Ilisu and other GAP dams are about damming the power of grassroots people exploiting and controlling them; the social and political control of people, always beginning with women. And as an attack on women, they are an attack on culture and the culture of caring work, which women in particular have maintained and developed. All of the other cultural destruction of thousands of sites and cultural places, of graveyards or oral tradition will follow if this attack on women is allowed to proceed.
- GAP is a tool of war in the guise of a development programme, a war waged not only by the Turkish authorities but by multi-nationals and government sponsors in the EU and US.
- In the context of the trampling over Iraq's heritage during the US-led war and occupation and the destruction of its descendents - the majority women and children - and their culture of caring the cultural destruction IIIsu would do could well be seen as further cleansing of culture in the Middle East.

Rather than symbols of modernity, GAP dams are weapons of mass cultural destruction in the Middle East and the Ilisu dam would be a monument, not to civilisation and progress, but to the barbarism of governments and companies who would build it.

Recommendations

To Governments and Other Potential Dam Funders:

Governments and other potential funders cannot reasonably decide to grant cover on the basis of this EIAR Update.

The dams planners and potential backers cannot speak only to political parties and NGOs but should consult directly with the grassroots communities affected by this project beginning with women because of their role as the main carers for their families and communities.

Governments should give serious consideration to the implications of further cultural destruction in the Middle East, particularly of important Muslim heritage and holy sites, as they receive requests to fund the dam.

To Project Developers including the Turkish Authorities:

There should be an investigation of corruption in the completion of RAP survey questionnaires.

The completed RAP survey questionnaires, in their entirety, should be released immediately and in particular affected communities should be fully informed as to their content and their significance.

The Master Plan for Hasankeyf should be released in its entirety to all interested parties.

The various surveys, archaeological and ethnographic, that TAÇDAM has compiled should be released publicly, first of all to affected communities.

All document releases must be in formats that all sectors of the community can have access to.

IKONOS images and IEG's interpretation of them, other raw data and locational information used to interpret site numbers in the reservoir area should be released immediately.

Plans for Ilisu should be halted and an independent investigation of the GAP project initiated beginning with its claims to benefit women.

For this to happen in a meaningful way the grassroots communities who have been the targets of this project need to be involved as protagonists which requires a change in priorities - an immediate end to conflict in the region, to military control and a full assessment of the contribution of each sector of communities to past and present.

To Multi-Lateral Institutions, Non-Governmental Organisations and Political Parties:

NGOs and the pro-Kurdish party might consider refusing the role of partnering the developer by receiving funding for resettlement and 'training' projects or becoming involved in 'commissions' with developers and governments, which have nothing to do with participatory democracy.

The UN and other international institutions should be asked to account for and revise their role in funding programmes linked to the GAP development project given its implications for cultural destruction, ethnic cleansing and the targeting of grassroots communities starting with women.