
A1 APPENDIX 1: INTERNAL MONITORING - NON-COMPLIANCES AND FOLLOW-UP

A1.1 AZERBAIJAN

A comprehensive programme of works has been developed to address infrastructural deficiencies that are considered to be the root cause of many of the outstanding Corrective Action Requests (CARs). The Project team in Azerbaijan will demonstrate closure on these CARs raised by undertaking a formal close out audit, tentatively scheduled for Q1, 2005.

A1.1.1 LEVEL I NON-COMPLIANCES

In Q3 there were 15 Level 1 non-compliance reports raised, 10 on the pipeline contractor (CCIC) and 5 on the facilities contractor (SPJV).

A brief description of Level 1 non-compliances is outlined below .

Waste Management

- The generation of a consignment of bentonite waste and its subsequent disposal was not recorded in documentation (CCIC).
- Inappropriate storage of spent caustic at Kurdamir camp (CCIC).
- Absence of waste register to track all wastes generated by Project (CCIC).
- Disposal of domestic waste to Balakhani municipal landfill. Waste transactions not recorded by AMSCO (CCIC).
- Some waste consignments stored at the AMSCO Baku waste storage yard were not recorded / documentation was missing (CCIC).

Pollution Prevention

- Water sampling not undertaken at open cut and HDD river crossings (CCIC).
- Method statements for vehicle and plant emissions monitoring incomplete. Accordingly, no monitoring was being undertaken (SPJV).
- No drainage plans were available for all drains in stalled at Kurdamir camp (SPJV).
- A small number of containers containing chemicals were stored without appropriate bunding (CCIC).
- Air conditioning units at Kurdamir found to use HFCF's as refrigerant gas (SPJV).
- Some deficiencies identified in pollution prevention and response plan, and associated pollution prevention documentation (CCIC).
- Inadequate storage of generator diesel at IPA1 (SPJV).

Environmental Management System

- Improvements to database of incidents and CAR's required. Not kept up to date at all times (CCIC).
- Improvements in the process to monitor and close CAR's required (SPJV).

Potable Water and Water Sustainability Studies

- Ground water abstraction studies have not been conducted for boreholes installed at Yevlakh and Tovuz camps (CCIC).

A1.1.2 LEVEL II NON-COMPLIANCES

A description of Level II non-compliances is given in Table A1.1. Note that this table includes new Level II non-compliances raised in Q3 as well as any previous Q2 non-compliances which were still open when the last report was issued.

Table A1.1: Azerbaijan Level II Non-compliances

Description	Corrective Action	Closure Status
Level II Non-compliances carried over from Q2		
WASTE MANAGEMENT		
Plant, Machinery and Vehicles Waste Handling, Segregation and Labeling. (CCIC).		
Some examples of poor waste segregation and labeling at Kurdamir and Yevlakh vehicle maintenance yards	Contractor to provide appropriate storage facilities and encourage appropriate labeling practices	No action taken to date Status: OPEN
POLLUTION PREVENTION		
Vehicle Emissions Monitoring Equipment. (SPJV and CCIC)		
The Transport Management Plans of both SPJV and CCIC describes vehicle emissions monitoring requirements. During vehicle emissions testing, no particulate monitoring was undertaken by either Contractor.	Sourcing of particulate monitoring equipment.	SPJV – No action taken to date Status: OPEN CCIC – Awaiting feedback from CCIC regarding action taken to date Status: OPEN
TRANSPORT MANAGEMENT		
Vehicle Equipment. Issued to Pipelines Contractor (CCIC).		
Several vehicles inspected at Kurdamir and Yevlakh were found to be missing some equipment (e.g. spare tyres, tyre pumps), as required by the Transport Management Plan, amongst other documents.	Contractor to ensure that equipment spares are provided and are robust.	CCIC are in the process of ensuring that all winching equipment is fit for purpose and drivers are competent is the use of this equipment Status: OPEN
New Level II Non-compliances (Q3)		
WASTE MANAGEMENT		
Waste Segregation Practices at Kurdamir Camp. (SPJV).		
During a waste management audit, some instances of cross contamination of SPJV generated waste streams resulting from poor waste segregation practices were observed.	Contractor was recommended to investigate the root causes for contamination of waste streams. Segregation requirements should be reinforced through further tool box talks.	CLOSED

Description	Corrective Action	Closure Status
Operation of Incinerator at Kurdamir Camp. (CCIC).	BTC to discuss with SPJV the importance of thorough waste segregation. Incinerator records should be completed in full each day and a back up copy made. A process for monitoring particulate levels should be agreed. Incinerator operators should received additional training in how to record and interpret data from continuous emissions monitoring unit. The continuous emissions monitoring system should be calibrated in accordance with manufacturers specifications.	OPEN
Deficiencies in waste containment, labeling and segregation. (CCIC).	It was recommended that CCIC ensure that all pipeline sites are provided with suitable waste receptacles, and that receptacles are clearly labeled. Tool box talks were recommended as a way to improve knowledge of staff regarding waste management. Investigation into the cause of poor waste segregation should be undertaken.	OPEN
Documentation of waste disposal. (CCIC).	CCIC required to review waste inventories and account for all wash down water produced to date and disposal methods. BTC should be advised of proposed methods for future disposal of this hazardous waste stream. BTC also recommends that the Contractor regularly audit their electronic waste register and regularly inspect waste accumulation areas.	OPEN
Documentation of waste disposal. (CCIC).	BTC recommends that the Contractor undertakes regular analysis of waste inventories to evaluate waste generation and disposal trends and determine waste storage space. The Contractor was encouraged to develop a waste database in order to undertake the above recommendations. Ash requiring future disposal should be sampled in order to confirm whether it should be considered as a hazardous waste disposal.	OPEN

Description	Corrective Action	Closure Status
Waste management. (SPJV).		
Inert construction wastes being stored incorrectly (without labeling, segregation etc) in the vicinity of PSA2.	Contractor instructed to provide suitable containers for the storage of inert construction wastes at the on site Waste Collection Point.	OPEN
POLLUTION PREVENTION		
Storage facilities for oil and diesel. (CCIC).		
Some instances where inadequacies in secondary containment facilities were noted in the oil and diesel storage facilities at Tovuz, Yevlakh and Ganja Camps. The vehicle refueling area in Yevlakh camp is missing an interceptor.	BTC recommended that the Contractor repairs any faulty bunds, and pass pipework and wires over bund walls rather than through them. Observation of secondary containment best practice was also recommended to the Contractor.	OPEN
Monitoring of emissions from vehicles and plant. (CCIC).		
Some deficiencies evident with the Contractors monitoring of vehicle emissions, such as no particulate monitoring had been undertaken and emissions monitoring equipment required calibration. Without adhering to approved emissions monitoring practices, the Contractor will be unable to demonstrate compliance with project standards.	Contractor encouraged to ensure that future monitoring includes all emissions parameters identified in the CCIC Transport Management Plan. CCIC also encouraged to ensure that calibration is undertaken in accordance with manufacturers specifications.	OPEN
REINSTATEMENT		
Erosion control measures. (CCIC).		
Inadequate erosion control measures undertaken at KP315, resulting in a deep (50cm) erosional channel.	Contractor instructed to bring area up to Class 3 or better erosion control standard. Temporary erosion control to be installed until full reinstatement complete. The rest of the ROW to be inspected to ensure erosion not occurring elsewhere.	OPEN

A1.2 GEORGIA

A1.2.1 LEVEL I NON-COMPLIANCES

There were 3 level 1 non-compliances issued to SPJV in Q3. A brief summary is outlined below.

Waste Management

- The unauthorised disposal of putrescible wastes at municipal landfill facility 1 km north-west of Bakuriani town (Pipeline).

Pollution Prevention

- Stream crossing at KP196+500 forded without adequate pollution prevention measures (Pipeline).
- The dumping of concrete and the flushing of cement mixers on the side of the road (Pipeline).

A1.2.2 LEVEL II NON-COMPLIANCES

A description of Level II non-compliances is given in Table A1.2. Note that this table includes new Level II non-compliances raised in Q3 as well as any previous Q2 non-compliances which were still open when the last report was issued.

Table A1.2. Georgia Level II Non-Compliances

Description	Corrective Action	Closure Status
Level II Non-compliances carried over from Q2		
POLLUTION PREVENTION		
Pollution Prevention Practices at PSG2 (SPJV Facilities)		
<p>Vehicle maintenance areas and refueling areas at PSG2 requiring improvements to be made in secondary containment. Bunds required for oil storage areas. Further oily water separators required in above mentioned areas.</p>	<p>(1) Permanent roof and appropriate containment facilities for maintenance areas to be installed. (2) Any contaminated soils to be appropriately disposed of. (3) Bunded parking area to be built for fuel delivery fleet.</p>	<p>(1) CLOSED (2) CLOSED – being stored until hazardous landfill is complete (3) CLOSED</p>
New Level II Non-compliances (Q3)		
River crossing undertaken without submission of Construction Method Statement (Pipeline)		
<p>The Contractor installed the Borjomula River Crossing without submitted in advance the Construction Method Statement for BTC approval.</p>	<p>(1) Contractor advised to fully investigate. (2) Contractor instructed not to perform further river crossings until the Construction Method Statement has been approved by BTC.</p>	<p>(1) OPEN – Outstanding. (2) OPEN</p>
Unauthorized site used to dispose of rock and soil wastes. (Facilities)		
<p>A stop work notice was issued by BTC to halt the disposal of excess rock and soil from PSG2 to an unauthorized site. However the Contractor continued to dispose of the wastes to the site in direct contravention of the Stop Work Notice.</p>	<p>(1) BTC instructed the Contractor to prepare an incident report in order to determine the root causes behind the action taken. The wastes should be removed. (2) Contractor to consider training / retraining employees in Project procedures particularly those associated with use of borrow pits / disposal sites. (3) Contractor to prepare a reinstatement action plan to fully reinstate the impacted area. Plan to include erosion and sediment control and to activate revegetation.</p>	<p>(1) CLOSED (2) CLOSED (3) OPEN – Draft spoil and rock disposal plan has been presented. Site specific reinstatement plan for this location awaited.</p>
Sediment and erosion control measures not implemented as required in Spread 2 (Pipeline)		
<p>During and following partial reinstatement of the BTC Right of Way, the Contractor failed to implement erosion and sediment control measures. This led to soil erosion and uncontrolled surface run off.</p>	<p>(1) BTC instructed the Contractor to undertake immediate clean up in all areas affected by sedimentation and provide compensation if required. (2) Contractor to immediately install erosion control measures in line with plans. (3) Contractor recommended to lead tool box talks indicating best practice with respect to erosion control measures. (4) Contractor recommended to monitor all areas prone to erosion and provide assurance to BTC that the Contractor is correctly installing and maintaining all required erosion control measures.</p>	<p>(1-4) CLOSED</p>

A1.3 TURKEY

A1.3.1 LEVEL I NON-COMPLIANCES

There were 21 level 1 non-compliances issued in Turkey in Q3. 0 to Lot A; 4 to Lot B; 4 to Lot C; 12 to Pump Stations; 1 to Ceyhan Terminal. A brief summary is outlined below.

Preconstruction Planning

- STA submitted a reforestation plan one month after the clearance of an area of trees when it is required prior to clearance. (Lot B)

Infrastructure

- During the course of construction PLL caused damaged to a community irrigation system.(Lot C)
- During the course of construction PLL caused damaged to a public road.(Lot C)
- STA used Sivritepe's village water supply at Sivritepe Camp without their consent. (Lot B)

Waste Management

- Failure to label waste drums (Stations)
- Contractor failed to fill in waste transfer form for waste traveling to from Erzincan Municipality Waste facility.(Stations)
- Surplus concrete waste is being dumped in an unlicensed waste facility in Pasinler Municipality with approval by Botaş (Stations)
- Wastes were not be sorted and disposed of in accordance with project requirements.(Stations)
- Wastes are not being adequately segregated and stored (Terminal)

Pollution Prevention

- Turbid trench water was pumped and discharged into an adjacent creek. In same area mixing of topsoil and subsoil was also observed. (Lot C)
- Dumping of sediment laden water into river without appropriate mitigation measures.(Lot C)
- Failure to sample waste water and well water at PT1 construction camp. (Stations)
- The Contactor failed to provide sufficient water bowsers to control dust on site.(Stations)
- The Contractor has not implemented required air quality and noise monitoring.(Stations)
- Inadequate number of oil spill kits on site.(Stations)
- Unapproved discharge of wastewater from the wastewater treatment plant at PT1 construction camp.(Stations)
- Chemical storage area does not have adequate pollution prevention measures in place to prevent pollution to soils, surface waters and groundwaters.(Stations)

Community Liaison

- Lack of sufficient community relations supervisor is Spread 2 and lack of Community Liaison Officers and vehicles for their use in Spread 1 and 3. (Lot B)

Third Party Facilities

- Extraction of aggregate from an unlicensed site.(Stations)
- Extraction of aggregate from an unlicensed site – repeat non-compliance (Stations)

Cultural Heritage

- Inadequate protection of archaeological site at KP 138. (Lot A)

A1.3.2 LEVEL II NON-COMPLIANCES

An update on the Level II noncompliances that were not closed in the Quarter 2 report is provided in Table A1.3.

Table A1.3 Turkey Level II Non-Compliances

Description	Corrective Action	Closure Status
Level II Non-compliances carried over from Q2		
POLLUTION PREVENTION		
Failure to undertake water quality monitoring at river crossing		
<p>Lot A, the pipeline trench excavation through RVX3-239 at KP 258+705 was undertaken without the required and necessary water quality monitoring and sampling having been carried out by EPC Contractor.</p>	<p>The root cause of this NCR was lack of communication between the EPC Contractor Construction Department and the EPC Contractor Environmental Department. The Environmental Department did not know that excavation at RVX3-239 was occurring, and hence could not perform the appropriate sampling. The EPC Contractor Construction Department has been informed that the Contractor Environmental Department must be notified of all watercourse crossing work prior to initiating activities, so that water quality monitoring and sampling can occur. Since the last quarter a meeting was held between the EPC Contractor to complete the closeout of the issue and finalise the corrective actions. It was agreed that the Contractor's field engineer would inform the Environmental Department on a weekly basis of upcoming activities so appropriate sampling could take place.</p>	<p>CLOSED</p>
Failure to implement adequate mitigation at watercourses		
<p>Lot A, The EPC Contractor has not employed adequate mitigation measures during works at watercourses, including lack of flume pipes, portable bridges, timber mats <i>etc.</i></p>	<p>Corrective actions included site-specific re-direction of work and implementation of immediate corrective measures as the issues that were identified through onsite monitoring. In addition, proactive measures to prevent the problems have been implemented, which include continued operator training, strategic plan for supplying materials for preventing damage to watercourses as well as ongoing identification of specific issues at Weekly Progress Meetings.</p>	<p>CLOSED</p>

Description	Corrective Action	Closure Status
COMMUNITY SAFETY		
Failure to implement community safety mitigation measures		
<p>Lot C: The EPC Contractor failed to implement required community safety measures including securing the worksite, demarcating the trenches with luminous fences, erecting protective barrier fencing around trench and crossing points, employing a watchmen.</p>	<p>The EPC Contractor has:</p> <ul style="list-style-type: none"> • Erected permanent wire fences at all block valve station construction sites • Established an 'open trench/excavation register' to track areas of open trench and ensure that appropriate measures are in place • Progressive reduction of open trench length • Where open trench is close to a village a watchman has been employed to ensure villagers do not enter the construction site. 	CLOSED
REINSTATEMENT		
Failure to implement necessary erosion control measures		
<p>Lot A. The EPC Contractor has failed to implement adequate and required temporary erosion control measures on newly 'stripped' sections of the ROW. This non-compliance has been observed to some degree across all Spreads in Lot A.</p>	<p>Corrective actions include site-specific re-direction of work and implementation of immediate corrective measures as the issues are identified through onsite monitoring. In addition, proactive measures to prevent the problems should be implemented, which include continued operator training as well as ongoing identification of specific issues at Weekly Progress Meetings. Since the last quarter it was agreed that a maintenance crew would be appointed for each spread to be responsible for installation and upkeep of temporary erosion control measures. This has not happened to date.</p>	OPEN
ECOLOGICAL MANAGEMENT		
Failure to implement method statement requirements in ESA		
<p>Lot B: The EPC Contractor entered ESA12 in October 2003. ESA12 is still open although more than 6 months has passed. To date, no update to the SARMS has been followed to identify and approve the possible change in definition of the extent of time in which the ESA is open. The EPC Contractor has not submitted any plans and/or procedures showing what mitigation measures are in place to protect topsoil in ESA 12.</p>	<p>A work method statement for the ESA has been developed. Translocation of plant species and seed collection is on-going. Since last quarter, construction has started in ESA 12, but has stopped due to poor weather conditions. All efforts will be made to complete construction prior to the onset of winter.</p>	OPEN

Description	Corrective Action	Closure Status
New Level II Non-compliances (Q3)		
PRECONSTRUCTION PLANNING		
Failure to implement method statement requirements		
Lot B. The construction works at ESA 27 were scheduled to last for six weeks. A delay in reinstatement has occurred and no update to the method statement has been initiated to manage this delay.	Implement the update to method statement to identify potential impacts and appropriate mitigation to limit the level of impact from the extended construction time in ESA 27.	OPEN
Clearing of Forested Area without preliminary surveys		
Lot B. The ROW clearance crew cleared a forested area between KP 722 to 723.5. No record was taken of the number of trees that had been cleared. No pre-construction survey was completed for this area before it was cleared. No reforestation plan was completed and the appropriate permit was not obtained from the Department of Environment and Forestry.	The area has been surveyed by the Regional Directorate of Forestry and it was confirmed that no permanent damage was caused by the Contractor's actions. The number and type of trees that have been felled have been identified and registered. Appropriate reinstatement for the area (including the number and type of trees to be planted) will be decided during the pre-reinstatement surveys of the area.	CLOSED
Lack of environmental appraisal before construction of access road		
Lot C. Along the ROW, extending from c.KP 744 to c.KP 880 the Contractor upgraded/constructed access roads without undertaking topsoil stripping and without submitting any of the necessary documentation such as environmental and social appraisal and land owner permits.	The Contractor will ensure that all outstanding documentation is submitted and in future that documentation is in place before commencing construction or upgrade of an access road. The Contractor will also provide a plan for the reinstatement of the affected areas, which, stipulates how the Contractor will mitigate their failure to separate the topsoil in these areas. The Contractor will provide a revised access road register to Botaş. Unnecessary access and bypass roads will be identified, closed and reinstated by BOTAŞ.	OPEN
Lack of necessary ROW preparation		
Lot A. The Construction Contractor has failed to adequately undertake subsoil preparation in compliance with the Project Reinstatement Plan.	The Contractor will, prior to commencing ROW subsoil preparation, demonstrate that the work will be completed in accordance with project requirements. This will be achieved through the completion of an action plan, which will document how future ROW site preparation activities will be undertaken to achieve compliance.	OPEN

Description	Corrective Action	Closure Status
WASTE MANAGEMENT		
Dumping of waste in unapproved site		
Lot B. The Contractor was observed dumping waste at an unapproved site near Mercan. The waste that was dumped had not been segregated.	Disposal at this site was stopped. Contractor sent in a task force to remove the illegally dumped waste. The waste was segregated and dumped at the appropriate project approved sites.	CLOSED
Waste Management of the ROW		
Lot A – The Contractor has failed to adequately manage solid waste on the ROW, particularly in the ‘mini-spread’ and Spread 2. There was an improvement in the behaviour of the Contractor in this regard for a short period of time but they have relapsed and poor practices have again been observed.	The Contractor will implement appropriate waste management procedures immediately in accordance with the commitments set down in the EIA and TPN management Plans.	OPEN
POLLUTION PREVENTION		
Failure to implement monitoring and inappropriate discharge of sewage water		
Lot C. The Contractor failed to monitor sewage discharge at Yesilkent Construction Camp. The Contractor has also not implementing the Contingency Plan for Sewage Water Discharge at Yesilkent as partially treated wastewater was being discharged instead of being moved offsite by tankers.	The Contractor has provided the results from the analysis of the sewage discharge to Botaş. Discharge was stopped after Stop Works notice was issued. The contingency plan to move the waste offsite is now being implemented. The partially treated sewage waste is being sent to approved facilities in Kayseri.	CLOSED
Sewage discharge at Azizli Camp		
Lot C. Sewage discharge at Azizli Camp did not meet project standards and the Contractor failed to implement the Contingency Plan of moving the sewage waste offsite by tanker.	The discharge was stopped after Stop Works notice was issued and the contingency plan was implemented. The partially treated sewage waste is being sent to approved facilities in Adana.	CLOSED
Sediment load into river and irrigation channel		
Lot C. At a river crossing at KP 953 Botaş was advised to take mitigation measures to prevent siltation in a river where the downstream water was used for irrigation. Later it was observed that these mitigation measures had not been implemented and the river and the irrigation channel were found to be carrying heavy sediment loads.	Silt fences and straw bales have been installed to prevent any further sediment release. The site has generally been cleaned up and housekeeping measures have been implemented. Training was provided to the Contractor foreman and environmental staff received training about mitigation measures to be implemented to avoid similar sediment pollution in future.	CLOSED

Description	Corrective Action	Closure Status
Discharge of sewage into irrigation channel		
CMT. During a site inspection it was found that the Contractor was discharging overflow sewage wastewater into an irrigation channel via an underground pipe connected to the top of the septic tank.	The pipe linking the septic tank to the irrigation channel was disconnected. Samples were taken from upstream and downstream and the results are almost the identical. The wastewaters are picked up more frequently under the responsibility of a dedicated staff member in the camp. Toolbox talks were given.	CLOSED
REINSTATEMENT		
Lack of temporary erosion control		
Lot A. The Construction Contractor has not implemented erosion control measures on a steeply graded slope of a cleared section of the ROW at c. KP 17. This has resulted in erosion at this site.	The Contractor will implement erosion control measures immediately in accordance with the commitments set down in the EIA and TPN management Plans.	CLOSED
Lack of temporary erosion control		
Lot A. The Construction Contractor generally is not implementing adequate erosion control measures on steeply graded section of the ROW in Spread 3. This is resulting in erosion at these sites.	The Contractor will implement erosion control measures immediately in accordance with the commitments set down in the EIA and TPN management Plans.	OPEN
Lack of appropriate erosion control measures		
Lot A. Along the ROW in Lot A generally erosion control devices (such as slope breakers, temporary water crossings and silt fencing) have not been maintained and new devices have not been installed as specified in the Contractor's Erosion Control Procedure and Project Reinstatement Plan.	The Contractor will prepare a list of erosion control measures to be installed and maintained for review by BTC. The list will identify area specific measures by specific ROW section and KP, and will prioritize critical ROW areas to be addressed first. Temporary erosion control teams will be identified and will implement temporary control measures.	OPEN
Failure to implement river bank protection		
Lot B. No bank protection and reinstatement measures have commenced despite having backfilled the trench at River Crossing 1-125 Karasu River at c.KP 411.	The Contractor will protect and restore the riverbank in a timely manner in keeping with project requirements.	CLOSED
Inadequate river bank protection		
Lot B. No bank protection and reinstatement measures have commenced despite having backfilled the trench at River Crossing 1-125 Karasu River at c.KP 345.	The Contractor will protect and restore the riverbank in a timely manner in keeping with project requirements.	CLOSED

Description	Corrective Action	Closure Status
Inadequate river bank protection		
Lot B. No bank protection and reinstatement measures have commenced despite having backfilled the trench at a river crossing at c.KP 536.	The Contractor will protect and restore the riverbank in a timely manner in keeping with project requirements.	OPEN
COMMUNITY SAFETY		
Missing and insufficient fencing on ROW		CLOSED
Lot A. Near the village of Tuygen at KP 134 it was seen that fencing was missing and/or insufficient.	In response to this NCR the Contractor informed villagers of when and where construction was taking place and the risks associated with the construction. Information was provided to the foreman on the reasons why fencing and backfilling was necessary to help ensure the safety of the villagers. The Contractor backfilled the trench near the village everyday and erected fencing around the trench.	CLOSED
THIRD PARTY FACILITIES		
Use of unlicensed borrow-pit		
Lot C. The Contractor was extracting padding material near Aslantas Dam reservoir area. The appropriate permit has not been obtained to take aggregate from this location and the appropriate surveys have not been undertaken.	The material extraction will be stopped until the Contractor is in receipt of the necessary documentation. An environmental statement, which included a recovery (reinstatement) plan for the area will be prepared.	OPEN
LAND		
Use of land outside ROW without appropriate approval		
Lot C. The Contractor used land outside the ROW without the necessary approval from Botaş.	The construction team that was responsible for this breach of project protocol have undergone training to understand the reasons for obtaining Botaş approval to use extra land. The Contractor submitted an 'extra land report' which has been approved by Botaş.	CLOSED
CULTURAL HERITAGE		
Inadequate archaeological protection		
Lot A. There has been a delay in finalizing the works at Sazpegler archaeological site at KP 36, which is putting the site at risk.	The site will be preserved, restored and backfilled as per the Method Statement.	OPEN