

Report of the Statia Heritage Research Commission (SHRC) for the Government of St. Eustatius, Netherlands Caribbean



Findings and Recommendations from SHRC reviews

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SHRC Report Summary Statement (English-Papiamentu-Netherlands)

Clearly, St. Eustatius has reached a developmental stage that can no longer support the 'blind-eye' approach of conducting scientific research, and in particular those fields of study that require respect for ancestors of the living St. Eustatius population. The old days of, science for science only, are long passed, modern heritage research now demands an accountability of how and what is being investigated, giving the St. Eustatius Community a priority role of authority in the planning and implementation of heritage research strategies. The Golden Rock case became the 'straw that broke the camel's back', and exposed how the practice of Archaeology went astray of the interests of the community intentions on St. Eustatius. In direct response to a growing public outcry and protests by Statian citizens, was the stimulus for the Statia Heritage Research Commission to be created, as an independent commission to assess this specific case, and the practice of Archaeology on St. Eustatius.

We were able to identify how for the Golden Rock case, appropriate communications with the public and among the key stakeholders, failed to be inclusive and engaging for representation of a community perspective. We identified specific problematic aspects of the Golden Rock case, including a lack of appropriate public involvement, and potential personal interests of the researchers, which needed to be addressed. More importantly, we further identified broader issues of systemic and administrative failures, which must be corrected for future research on St. Eustatius, upgrading them to be based on international standards for respectful practices. The most relevant Best Practice examples of these international standards are presented in detail, within this report.

For the SHRC investigative data collection, over a four-month period we virtually interviewed the key stakeholders for the Golden Rock case, including SECAR (St. Eustatius Center for Archaeological Research), Government Commissioners, and the scientific researchers Ruud Stelten and Felicia Fricke. With this, we gathered documents from all of these stakeholders to follow the procedures of implementation, and details of the plan of action at Golden Rock. What we determined, was that there is indeed still the 'blind-eye' approach used on St. Eustatius for Archaeology research, including the fundamental problem that Government claims no expertise thus passes responsibility to SECAR, who subsequently turns over responsibilities to the Researchers, all of whom should conduct best practices. This context left the investigation of sensitive community data, such as removal of enslaved African burials, completely unsupervised by formal St. Eustatius government authorities. It was determined from the evidence, that the lack of appropriate community involvement from the initial stages by both SECAR and the researchers, and even with warning from within the research team itself, was the result of the research directors not giving proper respect to the community role in the research. When the researcher declared they did try to have Town Hall meetings and school visits to the site, or tried to recruit Caribbean specialists but could not, they are clearly

showing they did not see the far more significant issues of emotional attachment and affinity for the human remains of St. Eustatius's ancestors, nor did they see the vital role that ancestors have for the surviving population of St. Eustatius today.

The second approach of the SHRC to investigate the Golden Rock case, was a Community Inquiry, conducted by Statians, with Statians, on Statia. This questionnaire survey, which took place around 'Statia Week' (11-19 November 2021), interviewed 101 residents of St. Eustatius, by 10 Statian interviewers, asking 10 questions each, at various daily-life locations on St. Eustatius. Although these interview results were strongly represented by female interviewees (62%), and the age group between 25-50 years (50%), males and other age groups were appropriately represented. Curiously, among the younger generation of 15-24 years (17%) we noted a significant interest to learn more about heritage, however including broader topics of life-ways and adaptations in the past, rather than only about slavery and colonization.

What we determined from the Community Inquiry results, was that there is a great desire of the majority of the community for more specific St. Eustatius history awareness and formal education on the island. We see that although Archaeology is, in general, seen as contributing to the community good, there is a strong and clear concern by the community regarding the removal of human remains. Human burials were repeatedly referenced as to be respected and not disturbed, yet it was also understood that some development projects will continue to impact burial sites, and thus some form of handling remains after mitigation is required. Within a designated period of trans-placement for the human remains, some technical tests (re. DNA, Isotopes) should be allowed on the remains per community consent, however re-interment of all human remains must be a requirement. Whether to re-inter at the same site, or elsewhere, had a split decision by the community, while the option to refuse any excavation of human burials was supported by the community for some cases.

We identified concerns of the community regarding the procedures of doing research and its administration on St. Eustatius, including issues of too much isolation of SECAR, and a general distrust of foreign researchers. This also included criticism of the lack of Government supervisory control over the work being done by both SECAR and the researchers. Some more significant suggestions from the Community Inquiry were that the Government must take more responsibility for Heritage administration and management, including a greater role for allowing Community voices of concern, and indeed more actual employment of local workers.

We see our recommendations for the specific Golden Rock case, as lessons learned from a bad experience, which now require us to change the dysfunctional system that allowed it to happen in the first place. Issues such as, the lack of Government supervisory authority, including necessary screening of research projects and researchers, as well as, stricter financial and community engagement requirements, must be identified and implemented on St. Eustatius. This should include identification of who is responsible for what, in heritage development and management on the island.

In regard to the broader issues of systemic failure and requirements to deal with it, we have recommended a re-structuring of Heritage administration on St. Eustatius, giving Government greater responsibility and controls through creation of a formal government *Heritage Agency*. The details of precise procedures, policies, and administrative implementation formats, are presented in this report, as part of our recommendations to upgrade these functions to international standards on St. Eustatius. A centralized administrative structure is recommended in cooperation with the relevant heritage entities, combined with a regular interactive public information service, all providing a crucial role for Community voices at all stages of heritage research. We further recommend an official position for a *Heritage Inspector* within the government Heritage Agency, for qualified maintenance of the responsibilities regarding heritage research, management of heritage sites, and expanded education of heritage on St. Eustatius. We further recommend that in order for Stadians to be more active within this proposed structure, we need more university scholarships and local educational programs, specifically for Stadians to follow heritage careers.

As an innovative approach, we have also recommended a community space *Memorial* concept, a place where respect is given to the remains of the ancestors, having them re-interred at a dedicated Memorial space on St. Eustatius, allowing recognition for both the legacy of the ancestors, and as inspiration for the next generation of Stadians.

Resúmen na Papiamentu

St. Eustatius a yega na un punto di desaroyo, kaminda e no por ignorá mas e trabou di hasi investigashon sientífiko, prinsipalmente esun ku ta rekeri rèspèt pa su antepasado. E pensamentu 'siensia pa siensia' ta un antiguá i estudio moderno di herensia ta eksiguí ku investigadónan mester ta responsabel pa kon i kiko ta investigá. Asina ta duna e komunidad di St. Eustatius tambe un papel importante den planifikashon i implementashon di strategia di investigashon.

E kaso di *Golden Rock* na St. Eustatius ta e kulminashon di un mal kustumber, ku a lanta masha hopi reakshon negativo bou di e pueblo. Na Golden Rock, arkeólogonan a bini topa ku skelèt di Afrikano esklavisá di siglo 18, ora nan tabata traha riba un pida tereno kaminda lo ekspandé e aeropuerto di e isla. E kaso akí a eksponé un echo ku arkeologia no ta tene kuenta ku interes di e komunidad di St. Eustatius. Despues ku algun hende, tantu bibá riba e isla komo pafó den diaspora, a protestá públikamente kontra e forma di traha akí, gobièrnu di St. Eustatius a lanta e komishon “Statia Heritage Research Commission” pa kontestá direktamentu e gritu i protesta públiko akí i tambe pa evaluá e práktika di arkeologia na St. Eustatius.

E komishon a kolektá dato durante un periodo di 4 luna. El’a entrevistá virtualmente algun miembro di e grupo di interes den e kaso di *Golden Rock*. Esaki a enserá SECAR (St.

Eustatius Center for Archaeological Research), Gobièrnu di St. Eustatius i e investigadónan científiko Ruud Stelten i Felicia Fricke. Huntu ku esaki, a studia e dokumentunan di grupo di interes pa asina sigui ku e prosedimentu di implementashon, i bini ku un plan di akshon mas detayá pa e kaso di *Golden Rock*. Por konkluí ku Gobièrnu di St. Eustatius a apliká un strategia di “tapa kara” ('blind-eye') relashoná ku investigashon arkeológiko akí. Un di e motibunanan duná pa esaki ta ku Gobièrnu di St. Eustatius no ta eksperto riba e tereno akí i a entregá su responsabilidad na e investigadónan, ku e speransa ku esakinan lo hasi e trabou mas mihó posibel. E konsekuensha ta ku investigashon, ku tin di aber ku dato sensitivo, manera esun kaminda a haña restu di Afrikano esklavisá, a keda kompletamente hasí sin supervishon di e outoridat ofisial di St. Eustatius. Segun dato kolektá pa e komishon, tantu SECAR i e investigadónan, asta ora miembro di e tim di investigashon mes a atverí pa esaki, no a duna rèspet i atenshon apropiá na komunidad den e investigashon. E deklarashonnan duná ku nan a purba di tin enkuentronan públiko na Town Hall (e sede di gobièrnu) i ku nan a resibí bishita di skol na e sitio, òf ku nan a buska spesialisista di Karibe pero no por a haña, ta mustra kla ku nan a neglighá emoshon di e komunidad ku tin afinidat ku e hendenan di kende nan a deskubrí nan skelèt. Tampoko nan no a realisá e papel vital ku e antepasadónan akí ainda ta hunga den memoria aktual di e pueblo di St. Eustatius.

E komishon a tene tambe un enkuesta bou di e komunidad di Statia, hasí pa hende di e isla mes. E enkuesta a tuma lugá durante e siman di St. Eustatius, kual ta di 11 te 19 novèmber 2021. Dies entrevistadó a entrevistá 101 habitante di Statia, pa medio di 10 pregunta. Hende muhé a representá e grupo mas grandi ku a reashoná (62%) i e grupo di edat mas grandi tabata entre 25 i 50 aña (50%). Loke ta lanta curiosidat ta, ku serka e generashon hóben di entre 14 pa 25 aña (17%) por a nota un interés enorme pa sa mas di nan herensia, inkluyendo tòpiko mas amplio manera sistema di bida i adaptashon di pasado, i no nesesariamente tokante di sklabilitut i kolonisashon.

Segun e enkuesta, e pueblo di St. Eustatius ta deseá pa enseñansa hunga un papel mas importante den krea un konsenshi históriko di e isla. Nan ta konsiente ku arkeologia ta kontribuí na konosementu di e komunidad, pero nan preokupashon grandi ta kon ta bai dil ku e restunan akí di nan antepasadonan esklavisá. Nan ta hopi kla den nan ponensha ku mester duna rèspèt na e antepasadonan akí, a apesar ku nan sa tambe ku mester hasi algun tèst tékniko manera esun di DNA i isótopo pa asina haña mas informashon relevante. E poblashon ta dividí ainda si mester dera e restunan bèk na e mesun sitio, òf na un otro lugá. Tambe algun hende a mensioná ku mester evitá ekskavashon den serto kasonan asina.

E komishon a identifiká un falta di komunikashon entre investigadó i tantu públiko komo gruponan di interés. E investigadónan a faya di inkluí e komunidad di St. Eustatius i nan no a kompremeté nan mes pa representá e perspektiva di esaki. E komishon a indentifiká esaki komo un di aspektonan spesífiko den e kaso di *Golden Rock*. Banda di e falta di involví e pueblo di St. Eustatius, e interes personal di e investigadónan tambe a hunga un papel. Ademas, e

komishon a identifiká fayo sistemátiko i atministrativo, kual mester keda korigí, pa asina den futuro investigashon na St. Eustatius por kumpli ku standart internashonal di práktika di rèspèt. E rapòrt akí ta duna detaye di algun èhèmpel di bon práktika.

E komishon a kontastá tambe ku tin un preokupashon den e komunidad pa e manera di hasi investigashon i e maneho di esaki na St. Eustatius. Asina a kontastá ku tin hopi sekresia den SECAR i ku tin un deskonfiansa den investigadó strañero. Tin krítika riba e falta di kontròl di gobièrnu riba trabou realisá pa SECAR i su investigadónan. A sugerí ku gobièrnu mester asumí mas responsabilidad pa e administrashon di herensia, ku ta inkluí tambe ku komunidad lo mester tin un bos mas grandi den e proseso di investigashon i ku tambe mester hasi uso di e servisio di trahadó lokal.

Komishon ta mira e rekomendashonnan pa e kaso spesífiko di *Golden Rock* komo un lès pa siña di mal eksperensia. Esaki ta rekerí ku mester bini ku un kambio den e sistema disfunshonal ku a tolerá den transkurso di tempu. Gobièrnu mester tin mas outoridad pa supervisá, kual mester inkluí skrinmentu di e proyekto di inbestigashon i e inbestigadónan. Tambe mester yega na un kompromiso finansiero mas estrikto i na un partisipashon di komunidad mas estrecho. Esei ta inkluí tambe ku mester indentifiká mas presis ken ta responsabel i pa kiko, den e desaroyo di herensia riba e isla.

Tokante e problema mas amplio di fayo den e sistema i kon mester dil ku esaki, e komishon ta rekomendá pa restrukturá e administrashon di herensia na St. Eustatius. Gobièrnu mester haña mas responsabilidad i kontròl di esaki dor di krea un agensia ofisial di herensia. Den e sekshon di rekomendashon, e rapòrt di e komishon ta duna mas detaye di e prosedura, maneho i format kon pa implementá esaki, ku e meta pa mehorá e funshonnan akí na St. Eustatius segun standart internashonal. E ta rekomendá tambe pa tin un struktura atministrativo sentral, kombiná ku un servisio di informá komunidad regularmente riba un forma interaktivo.

E komishon ta rekomendá pa bini ku un puesto ofisial di un *Inspektor di herensia* den gobièrnu, ku den un forma profesional lo ta enkargá ku inbestigashon di herensia, maneho di sitionan di herensia i ku lo yuda desaroyá e edukashon di herensia na St. Eustatius. Ademas, e komishon ta rekomendá ku si kier stimulá hende di St. Eustatius pa siguí un karera riba tereno di herensia na un nivel universitario, mester bini ku mas estudio universitario i programa edukashonal spesialmente den e ámbito di herensia.

Komo un aserkamentu inovativo, e komishon ta rekomendá pa bini ku un espasio den komunidad den forma di un '*Memorial*', kual mester ta un lugá kaminda lo dera e restunan di nobo i asina ta duna rèspèt na e antepasadónan akí di e pueblo di St. Eustatius. Asina lo honra e legado di e antepasadónan aki pa nan siguí inspirá e generashon nobo di St. Eustatius.

Management Samenvatting in het Nederlands

De tijd dat wetenschap om wille van de wetenschap werd bedreven is voorbij. Sint-Eustatius bevindt zich in een fase waarbij het wetenschappelijk onderzoek op het eiland niet langer blindelings kan ondersteunen. Dit geldt in het bijzonder voor sensitief onderzoek waarbij respect voor voorouders van Statianen is vereist. De commissie spreekt van een ‘blind-eye’ benadering. In eigentijds erfgoedonderzoek moet verantwoording worden afgelegd over wat wordt onderzocht en hoe onderzoek plaatsvindt. De Statiaanse gemeenschap dient te zijn betrokken bij de planning en uitvoering van erfgoedonderzoek. Tijdens het Golden Rock project is hieraan voorbijgegaan. Naar aanleiding van de maatschappelijke verontwaardiging en protesten van burgers is de Statia Heritage Research Commission (SHRC) opgericht. SHRC is een onafhankelijke interdisciplinaire commissie van deskundigen die het Golden Rock project moet evalueren en aanbevelingen moet doen over hoe verder te gaan met dit project en eveneens advies moet geven over het overheidshandelen en het overheidsbeleid omtrent onderzoekspraktijken op het gebied van cultureel erfgoed op Sint-Eustatius.

De SHRC commissie stelt vast dat de communicatie met de gemeenschap en ook die tussen de belangrijkste stakeholders tijdens het Golden Rock project heeft gefaald. Ten aanzien van het Golden Rock project, constateert de commissie dat het projectmanagement de gemeenschap onvoldoende heeft betrokken bij het project, dit in mede verband met persoonlijke belangen van de onderzoekers. Ten aanzien van het overheidsbeleid wijst de commissie systemische, dat wil zeggen bestuurlijke tekortkomingen aan in de samenwerkingsrelatie tussen overheid, de ngo SECAR (St. Eustatius Center for Archaeological Research) en het management van het Golden Rock project. Ten behoeve van toekomstig onderzoek moeten deze tekortkomingen worden verholpen, gebruikmakend van internationale richtlijnen voor erfgoedbeleid en –(onderzoeks-)management.

De commissie heeft gedurende vier maanden gegevens verzameld. De belangrijkste stakeholders van de Golden Rock casus, waaronder de eilandelijke overheid, SECAR en onderzoekers dr. Ruud Stelten en dr. Felicia Fricke zijn (online) geïnterviewd. Tevens verzamelde de commissie relevante documenten om het verloop van het project te reconstrueren. De commissie stelt vast dat op Sint-Eustatius nog altijd sprake is van een ‘blind-eye’ benadering van archeologisch onderzoek. Een belangrijke oorzaak is gelegen in het feit dat de overheid van mening is dat het niet over voldoende expertise beschikt om archeologisch onderzoek te kunnen beoordelen en deze verantwoordelijkheid overdraagt aan SECAR, die deze verantwoordelijkheid vervolgens in handen plaatst van de uitvoerende onderzoekers. Hierdoor ontbrak overheidstoezicht over op het Golden Rock project. De omstreden verwijdering van achttiende eeuwse begravingen van tot slaaf gemaakten vond derhalve plaats zonder enige vorm van supervisie. Uit de verzamelde gegevens blijkt dat zowel SECAR als het

projectmanagement de betrokkenheid van de gemeenschap - ondanks aanmaningen vanuit het onderzoeksteam - vanaf de aanvang van het project onvoldoende hebben nagestreefd. Weliswaar hebben de onderzoekers getracht om town hall meetings en schoolbezoeken te organiseren en Caribische onderzoekers in het project aan te stellen, maar de cultureel gevoelige kwestie omtrent de waardering van voorouders en hun lichamelijke resten onder de Statiaanse bevolking wist men niet op waarde te schatten.

De tweede werkwijze om de Golden Rock casus te onderzoeken bestond uit een survey-onderzoek, uitgevoerd door Statianen, met Statianen, op Statia gedurende 'Statia-week' (11-19 november 2021). Er zijn 101 inwoners van Sint-Eustatius geïnterviewd. Hoewel onder de respondenten vrouwen (62%), en personen uit de leeftijdsgroep tussen 25-50 jaar (50%) sterk zijn vertegenwoordigd, namen ook mannen en personen uit andere leeftijdsgroepen deel aan de survey. Uit de resultaten blijkt dat de meerderheid van de respondenten de wens heeft om meer kennis te verwerven en bewustzijn te ontwikkelen over de geschiedenis van Sint-Eustatius en dat dit onderwerp meer aandacht verdient in het onderwijs op het eiland. Opvallend is dat de jongere generatie van 15-24 jaar (17%) naast informatie over slavernij en kolonisatie ook meer te weten wil komen over erfgoed over levenswijzen en culturele veranderingen op het eiland.

Uit de survey blijkt dat de bevolking van mening is dat archeologisch onderzoek kan bijdragen aan het welzijn van de gemeenschap, maar ook dat er een duidelijke bezorgdheid bestaat ten aanzien van het verwijderen van menselijke resten. Respondenten wezen er herhaaldelijk op dat menselijke begravingen moeten worden gerespecteerd en niet mogen worden verstoord. Men realiseerde zich ook dat ontwikkelingsprojecten invloed hebben op begraafplaatsen en dat hierover een beleid moet worden vastgesteld. Na de overbrenging van menselijke resten kan onderzoek (zoals DNA- en isotopenonderzoek) worden toegestaan, maar binnen een vast te stellen termijn en onder de voorwaarden zoals vastgesteld door de lokale gemeenschap. Herbegraving moet daarbij een vereiste zijn. Op de vraag of dat op dezelfde lokatie of elders moet plaatsvinden, reageren de respondenten verdeeld. In bijzondere gevallen moeten opgravingen van menselijke resten kieskeurig kunnen worden verboden.

De commissie stelt verder vast dat de gemeenschap zich zorgen maakt over de bestuurlijke procedures rond het verrichten van onderzoek op Sint-Eustatius en over het isolement van SECAR. Respondenten uiten kritiek op het gebrek aan greep en toezicht door de overheid op de werkzaamheden van zowel SECAR als de uitvoerende onderzoekers. Er heerst in dit verband een algemeen wantrouwen ten opzichte van buitenlandse onderzoekers. Respondenten zijn van mening dat de overheid meer verantwoordelijkheid op zich moet nemen aangaande erfgoedbeleid en -beheer, het bevorderen van gemeenschapsparticipatie ter zake (inclusief het luisteren naar zorgen in de gemeenschap) en het tewerkstellen van lokale werknemers in erfgoedprojecten.

De commissie beschouwt haar aanbevelingen als lessen die kunnen worden getrokken uit de Golden Rock casus. Op de eerste plaats moet de oorzaak van het mislopen van het Golden Rock project worden verholpen, namelijk het falen van het bestuurlijke systeem – de 'blind-eye' benadering. Er ontbrak een regisserende en toezichhoudende instantie vanuit de overheid. Screening van projecten en onderzoekers lag de facto in handen van ngo SECAR. Er waren geen duidelijke eisen op het gebied van financiën. De lokale gemeenschap werd bovendien niet betrokken bij het project. Om deze reden moet worden vastgesteld welke actoren welke verantwoordelijk dragen bij de ontwikkeling en het beheer van erfgoedbeleid op het eiland.

De commissie beveelt aan om het beleid en beheer van cultureel erfgoed op Sint-Eustatius te centraliseren door de oprichting een centrale dienst voor erfgoedbeheer. Deze dienst zal opereren op basis van internationale richtlijnen en samenwerken met de relevante erfgoedentiteiten. Door publieksvoorlichting en maatschappelijke dialoog kan de bevolking worden gehoord in alle stadia van erfgoed- en onderzoeksbeleid. Ook beveelt de commissie aan om binnen deze overheidsdienst de functie van erfgoedinspecteur in het leven te roepen. De inspecteur ziet toe op handhaving van het beleid met betrekking tot erfgoed (onderzoek) en het beheer van erfgoed lokaties. De inspecteur draagt tevens zorg voor erfgoededucatie op Sint-Eustatius. Voorts beveelt de commissie aan om de bevolking van Sint-Eustatius actief te betrekken in deze beheersstructuur, om studiebeurzen beschikbaar te stellen voor Statianen die een een erfgoedcarrière nastreven en om lokale onderwijsprogramma's over erfgoed tot stand te brengen.

Voor wat betreft haar taakstelling 'hoe verder te gaan' met het Golden Rock Project stelt de commissie voor om een publieke gedenkplaats, een 'Memorial Space' aan te wijzen waar menselijke resten worden herbegraven, waar respect kan worden betoond aan de voorouders en hun culturele erfenis waar komende generaties Statianen inspiratie kunnen opdoen.

1. Introduction

This evaluation report is submitted in compliance with the official mandate of the St. Eustatius Executive Council, on 17 September 2021 [Decree No.2] (see the letter in Appendix I). The mandate of this decree includes two primary tasks for the commission; first to evaluate the Golden Rock Burial Ground specific case and make recommendations; and secondly, to provide community and expert opinions regarding cultural heritage research practices on St. Eustatius (popularly called Statia), with recommendations for changes to conform with international standards.

Section 1 of this report focuses on the background of the research and the contextual/conceptual framework that guided the working groups approach. In Section 2, we present the findings of the commission on the Golden Rock Burial Ground case. Therefore in Section 3, we present our recommendations concerning this particular case. The fourth Section summarizes current international standards for archaeological research. This summary is followed by our Section 5 recommendations for future archaeological research on St. Eustatius (and the wider Caribbean). The Appendixes II-IX, provide the reader with a compilation of details for the SHRC members, Community Inquiry results, and specific reference guidelines and document models for archaeological practices.

1.1 SECAR

The St. Eustatius Center for Archaeological Research (SECAR) was established as a non-profit foundation in 2000, under the direction of R. Grant Gilmore, with subsidy from the St. Eustatius Island Government (which then belonged to the former federation called the Netherlands Antilles). The SECAR was created to provide a permanent archaeological presence on the island, with the goal of protecting and developing the resources for historical data, in cooperation with the local community. The early years of SECAR research activities were implemented via a field-school funding approach for specific research projects, whereby foreign students/individuals could pay a fee, to assist in conducting archaeological research on St. Eustatius (Haviser 2015). This funding approach was sufficient for purely scientific investigations, however was greatly lacking in actual community engagement and involvement, other than occasional visits to the excavations by local school children or groups. After the departure of Grant Gilmore in 2011, he was first replaced by Ruud Stelten, then a series of new directors for SECAR tried to carry-on the same research and funding approaches, with various and often diminishing results.

The relationship between SECAR and the Government of St. Eustatius has been from the beginning, based on a primarily financial basis of subsidy, such that the Government claims no expertise in archaeology and the SECAR was to fulfill that role for the community, by implementing archaeological research when necessary. The SECAR additional funding model

was accepted by the Government, and then eventually extended to include more and more government funded development projects. However, with the Government lack of expertise, a 'blind-eye' approach became the norm of practice for projects between the SECAR and Government. The Government acceptance, accentuated the SECAR priority of pure scientific research over integral community engagement, resulted in a general isolation of SECAR from the broader St. Eustatius population. This 'blind-eye' relationship further segregated the Government authority over the practice of Archaeology by SECAR, including the hiring and supervision of foreign experts conducting the research required. When the islands of Bonaire, Saba and St. Eustatius (popularly called the BES-Islands) were transferred to the Netherlands administration as municipalities, on 10 October 2010, changes in the relationship began to escalate.

1.2 After 10 October 2010

Since 10-10-10, which was the date of transfer of St. Eustatius to be directly under administration from the Netherlands as a municipality, the application of the Malta Convention (1990) has been required, including that archaeological mitigation and inspections can be required. The implementation of the Malta Convention requirements, via the Netherlands Ministry of Education, Culture and Science (OCW) and Rijksdienst voor het Cultureel Erfgoed (RCE), and administered locally by the St. Eustatius Government, was introduced with continental Netherlands policies of practice, and did not well consider the numerous variations, both physical and cultural, implicit in doing Archaeology on small islands in the Caribbean. This problem of implementing Malta in the Dutch Caribbean, has been discussed since its first introduction (NAAM 2004), however with no significant legal or administrative changes, the 'blind-eye' approach noted earlier, has been utilized instead.

A further complication in the post-2010 era, has been the introduction and rapid increase in Commercial Archaeology applications on the islands, these are required by the Malta regulations and often incur substantial costs for the islands people and governments. An extensive study was done regarding how Archaeology students from the Netherlands, conduct research abroad, with an entire chapter on the Dutch Caribbean (van der Linde, et al. 2012). Within this book, the authors outline how Dutch Archaeologists are very pragmatic, by following the funding sources, and also very adaptive, by adjusting project policies, discussions and aims, to new conditions, and demands *of the funding sources* (2012:149), and especially funds for development projects have emerged as a vital financing source. Nonetheless, the book also acknowledges how more inclusiveness is absolutely necessary on the islands, including value-based heritage approaches, continuous ethnographic reflection, and the need to shift from research for purely scientific purposes to sharing knowledge and collaboration on an equal basis with the community (v.d. Linde et al. 2012:150).

1.3 Background for the Golden Rock site excavations

In 2020, a Malta required archaeological mitigation for the Golden Rock site was requested of SECAR by the St. Eustatius Government, for the removal of sand in preparation for planned extensions of the airport facilities. In response to this request, the SECAR proceeded to contract archaeologists from the Netherlands, under the direction of Ruud Stelten, to conduct the mitigation work. This first contact with Ruud Stelten was apparently stimulated by his previous work for SECAR, both on the Board, and as SECAR Director conducting mitigation work at other sites on St. Eustatius in the past. There was apparently no oversight by the Government as to the selection process and contracting by SECAR for the Golden Rock investigation.

From the earliest preparation phases in the Golden Rock site Plan of Action documents, neither the SECAR nor Stelten, directly consulted with the Community about their plans for the mitigation, albeit SECAR did repeatedly notify the government of the need for press releases. Indeed there are indications in the preparation documents, that information about the potential of the Golden Rock site to have enslaved African burials, was suggested to be withheld from the public, and that any general public information was minimal even after the initial discovery of enslaved African burials at the site. Furthermore, there were questions raised as to the potential conflict of interests of Stelten to conduct this research, the excessive costs proposed for this investigation, and the lack of Caribbean-origin scientific staff on the project. Once these issues became known publicly, there were various interests groups on St. Eustatius and in the Netherlands who organized protests and petitions to stop the research at Golden Rock.

To complicate this situation, a series of SECAR Town Hall meetings were held on St. Eustatius, to inform the public about the ongoing site research, but rather than help, these meetings became conflict formats regarding specific information avoidance, and in particular regarding details about the burials. Subsequent to these events a series of newspaper editorials and letters to the St. Eustatius Executive Council, have criticized both the Golden Rock project and the process by which it was implemented via SECAR.

To deal with this situation, and considering that the St. Eustatius Government claims no expertise in Archaeology, the Statia Heritage Research Commission (SHRC) was established by formal decree on 17 September 2021. The mandate of this decree has two key elements, the evaluation of and recommendations for dealing with the specific Golden Rock case, and secondly to evaluate and recommend revisions to the existing systemic structure of administrative processes, practices and policies that have allowed this situation to occur. Within the formal decree, it was decided that 15 members would comprise the SHRC, including regional professional archaeologists, anthropologists, historians, and experienced persons who know the Caribbean region. The majority of SHRC members are born-Caribbean individuals

from seven different countries, and five members are born-Statians. The chair of the SHRC was selected based on his being the President of the International Association for Caribbean Archaeology (IACA), and thereby the potential regional application of the recommendations to be produced by the SHRC. The specific selection process for the members of the SHRC, was to seek individuals who have extensive experience in Caribbean heritage research, and specifically those who have dealt with either Community Engagement programs and/or enslaved African burial ground investigations (see Appendix II for the SHRC members list). During the work of the SHRC, it was deemed most effective to separate into four groups to tackle specific areas of evaluation, each of these groups had representatives of born-Statians, as well as Archaeology, Anthropology and Heritage specialists on them, and the goal was that each group produce specific topic sub-reports, which are summarized in this report.

On 20 June 2021, a letter was submitted to the St. Eustatius Island Government from protest organizers the Ubuntu Connected Front (UCF), a political organization in the Netherlands and St. Eustatius, the Brighter Path Foundation (BPF), and the St. Eustatius Awareness and Development Movement (SEAD), outlining their concerns regarding the Golden Rock Burial Ground excavations. As a direct response to that letter, along with concerns from the Concerned Statians Group (CSG) on St. Eustatius, and in the spirit of diversity of opinions, two of the signatories on the 20 June 2021 letter, Xiomara Balentina (BPF) and Teresa Leslie (CSG), were requested to be on the SHRC and they accepted, specifically because they represented the UCF and the Concerned Statians Group stated organizational perspectives.

After a barrage of subsequent critical newspaper editorials by UCF, regarding the SHRC mandate and procedures, along with their questions about the SHRC members and Institutions, from a UCF defined de-colonial position, Corinne Hofman withdrew from the SHRC in December of 2021.

The direct actions of the SHRC have been to first evaluate the available documentary sources relating to the specific Golden Rock case, as well as regional documentation relating to these same issues, then to conduct a series of key stakeholder personal interviews, and simultaneously to conduct a Community Inquiry questionnaire survey of opinions directly from the St. Eustatius community itself. The synthesis of these three data sets were then compiled into this final report.

1.4 Contextual and Conceptual fundamentals for this report

There are various concepts that the SHRC wants to clarify as being the contextual and conceptual fundamentals for this report and its recommendations. The concepts presented here, are the final result of decades of cultural perspective transformation of the Social Sciences in general, and specifically conceptual evolution within the discipline of Archaeology, including the sensitive issues of dealing with human remains.

At the core of these concepts is the semantic conflict between what is understood as 'cultural property' and what is 'cultural heritage'. When the legal treatment of materials and traditional values are attached to property need to be modified in order to secure other social goals (such as protection of the environment or cultural heritage), opposition to those goals is based on the idea that 'property' has basic importance in culture, and its legal incidences must be given priority (for a thorough review of this debate see Gerstenblith 2008). This conceptual debate should not be diluted by the unconscious use of an ideologically-charged term like 'property'. In the last decades, the term 'cultural heritage' has been shown to carry less conceptual baggage, as opposed to 'property', which has a wide-range of emotive and value-laden nuances. The relation to this report, is that 'property' policy has been seen as protection of the rights of the possessor, while 'cultural heritage' policy is seen as protection of the heritage for the appreciation of present and future generations. 'Cultural heritage' policy is more than physical protection, including non-material elements, and allows the access and involvement of persons other than the owner, thus may also involve restrictions on the rights of the possessor, whether that be an individual, community or state. The function of 'property' law is a particularly Western concept, having significant commercial connotations, and often little in common with heritage values. This context allows for proper management and protection of both material and non-material cultural elements with the appropriate legalities in place, yet also, can imply control by the possessor, with the ability to alienate, to exploit, and to exclude others from the object or site in question. Perceptions of 'property' are often oversimplified into distortion ('an owner can do anything they like with their property'), while the use of 'cultural heritage' more strongly creates a perception of something handed-down, something to be cared for and cherished, a legacy from the ancestors. The term 'cultural heritage' breaks from the danger of seeing objects/sites solely in terms of their commercial value, as well, cultural heritage manifestations include very different sorts of materials, which need to be considered together and connected, as essential elements of heritage. There is far less value in an object alone, than of the object accompanied by information about its significance and use in the society which created it, and the context in which it emerged. The new legislations and trends in Archaeological research, are increasingly concerned, not with the isolated objects, but with modern technological means identifying and preserving what is truly representative of the culture. Cross-cultural understanding depends on information, while the preservation of cultural identity depends on the appreciation of traditions and oral histories and presentation of local folklore, skills and agency. What is needed, is a coherent system of policies and practices applying to all cultural manifestations, which will take account of the particular nature and requirements of each manifestation, arising from the need to protect them. A particular consideration is recognizing that cultural heritage should proceed from the perspective of a rights based approach to heritage, specifically, *Article 27 of the Universal Declaration of Human Rights*, which states that '...everyone has the right to freely participate in

the cultural life of the community, to enjoy the arts and to share in scientific advancement and its benefits. Cultural rights are, therefore, inseparable from Human Rights, as recognized in *Article 5 of the 2001 UNESCO Declaration on Cultural Diversity*, and can be defined as the right of 'access to, participation in, and enjoyment of culture'. This includes the '...right of individuals and communities to know, understand, visit, make use of, maintain, exchange and develop cultural heritage and cultural expressions, as well as to benefit from cultural heritage and cultural expressions of others.'. Other human rights, such as the rights to freedom of expression, the right to information, and the right to education, are key to the realization of cultural rights.

When dealing with the sensitive issues surrounding human remains, the difference in legal/administrative treatment of Indigenous (Native American) and African burials, with those of European burials, is one of the most striking historical contexts of inequality, as an unresolved clash in cultural values. Science practices of the past had failed to recognize that human remains are part of the continuity of existent cultural traditions. It was the NAGPRA (Native American Graves Protection and Repatriation Act) of 1990, that opened the legal and administrative eyes of the United States and became an International Standard, towards a more conscious respect for ancestral remains. NAGPRA was the first comprehensive approach to treating Indigenous cultures as ongoing living cultures, worthy of respect for both their past contributions to broader society, and to their own continuing specific cultural dynamic. In the NAGPRA case, Indigenous groups argued that curation (of human remains) violated their rights to religious freedom, as some ethnic groups believed the spirits of their dead cannot rest until their remains are re-interred. It is of some interest and relevance, that the Golden Rock site was first archaeologically investigated from the 1980s, as an Indigenous village settlement (Versteeg and Schinkel 1992). The NAGPRA also recognizes the significant contributions that new scientific technologies can make towards a more profound understanding of cultural heritage, and therefore it outlines a means to accommodate both interests.

These are some of the key points of the NAGPRA in the regard of seeking a balance between Community involvement and Science research:

1. A combination of Community and Science produces practical and positive effects of dignity and respect for the Indigenous societies, including greater technical understanding of the remains themselves
2. The information and distribution of collections inventory and evidence must have specific requirements, including recognized priority authorities for the Community opinions
3. Requirements for repatriation of cultural objects, and reduced illegal trafficking of such materials
4. Creation of a better understanding of the cultural diversity regarding these issues, among the community, researchers, and governments.

The NAGPRA is first and foremost a civil rights and human rights legislation, treating the Indigenous cultures as living cultures, worthy of respect for both past contributions to humanity and their continuing vitality. Through the NAGPRA, the ultimate result has been returning to the Indigenous peoples, the ability to control their own identity, history, and heritage. The usefulness of the NAGPRA model, as well as similar examples from the Society for American Archaeology (2021), and the Caribbean region (IACA Code of Ethics 2021), for our present case of an Enslaved African Burial Ground on St. Eustatius, is clear and precise.

2. The Golden Rock case

The direct actions of the SHRC have been to first evaluate the available sources relating to the specific Golden Rock case. These were fundamental to both the research effort concerning the analysis of specific Golden Rock case, as well as our task to present recommendations for future archaeological research in St. Eustatius. Based on this documents review, a series of key stakeholder personal interviews were conducted (Section 2.1) and the Community Inquiry questionnaire survey of opinions directly from the St. Eustatius community itself (Section 2.2). The synthesis of these data sets was then compiled into the second Section summary and the recommendations in Section 3.

2.1 Key stakeholder interviews

There were identified by the SHRC as being four key stakeholders in the particular Golden Rock case evaluation, these were; the Government, SECAR, the specific Contractor, and the Community. There were a series of virtual interviews with each of the first three groups, and the above noted Community Inquiry was conducted for the fourth stakeholder opinion. Within these individual interviews, the first was with the St. Eustatius Government authorities, consisting of Alida Francis, Claudia Toet, Natasha Radjouki, and their staff; while the second interview was with Gay Soetekouw and Fleur Lagcher of SECAR, and the third interview was with Ruud Stelten as the Golden Rock excavations contractor and Felicia Fricke assisting with physical anthropology for the project. These interviews were recorded, so have a permanent record within the SHRC documentation archive.

The first interviews were conducted with the St. Eustatius Government representatives, being two Government Commissioners, the program manager of the Department of Culture, and their various staff. There were two virtual meetings with this key stakeholder group by the SHRC, in September and October 2021. The general opinion of the government outlined in these meetings, indicated that the St. Eustatius Government had neither understanding nor

experience, of the requirements for archaeological research within international standards. It seems that the Government position was that they had turned these matters over to the SECAR to handle, as outlined in the goals of SECAR original mandate. As the needs for more archaeological research increased on the island, particularly after the legitimate introduction of Malta regulations in 2010, the gap between government monitoring and SECAR actions became wider and less directly connected, other than for financial subsidy. This follows the 'blind eye' approach of administration identified previously as being a key problem in appropriate administration and authority over the research of St. Eustatius's cultural heritage. The dysfunctional hierarchy became, Government requests SECAR to conduct a research required via the Malta regulations, then leaves the further decisions to SECAR. Subsequently, the SECAR passes the responsibility of the research to the hired Contractor who is to be paid to do the work, and again the responsibility for proper administration and practice is turned-over to the contractor, having SECAR then stand back to allow the Contractor to do the work, essentially unsupervised. Clearly, this scenario is at the core of the problems relating to the specific case of the Golden Rock excavations, and significantly regarding the direct participation and involvement of St. Eustatius Community voices in the project.

When the interview with SECAR occurred, their position was that they were to be responsible for the excavations and scientific work only, while the government was to be responsible for the Community consultation. This is in fact contrary to international standards, which require both the lead agency and contractors heading the project, to also implement Community involvement from the initial stages of any research project. Two of the primary sources of this administrative problem at SECAR, are evidenced by the lack of professional archaeologists on the SECAR Board of Directors, and the apparent lack of formal Archaeological Code of Ethics and Policies for implementation, which the SECAR should follow. It seems that the St. Eustatius contexts for the Golden Rock excavations, has suffered from both the 'blind eye' approach, and indeed also a 'kick the bucket down the road' attitude towards responsibility from both the Government and SECAR.

When the Golden Rock Principle Investigator, Ruud Stelten, and staff assisting with Physical Anthropology, Felicia Fricke, were interviewed as key stakeholders, they continued to outline the same problems of passing the responsibility to others, in their opinion the Government should have handled Community consultation. From the view of Ruud Stelten, there were sufficient community involvements for this project, being Town Hall meetings and visitation to the site during excavations, by school groups and the general public. However, it seems that Stelten did not consider the importance of involving the Community opinion during the preparation phases of the Golden Rock research campaign, and indeed there are indications in the site documentation that it was even suggested to avoid informing the public of the burials for concern of negative reactions. This last point is a clear red-flag, that the contractor

not only was aware of the presence and importance of the enslaved African burial ground, but that they also understood the community may have other opinions as to how to deal with these burials, including to stop the work, which the contractor did not want. Overall, this unfortunate situation is, in part, a product of the lack of appropriate application of laws, policies, processes and guidance for such research undertakings.

It is further of note, that the second of the contractor stakeholder interviews was actually requested by two participants in the Golden Rock excavations themselves, Felicia Fricke and Taylor Brown. In this second interview, a scenario of serious discontent within the actual Golden Rock research team (under Ruud Stelten) was expressed, with a specific indication that many of the other professionals in the project, were unhappy with the significant lack of Community engagement for the project. These professional concerns were as well submitted to SECAR in writing, at the time of the initial public outcry for investigation of this project. One of the issues also covered, was why there were no Caribbean-based specialists on the Golden Rock research team, such that all were from either Europe or North America. The response from contractor Ruud Stelten, was that they had tried but could not find anyone. This explanation is difficult to accept, such that there currently are many Caribbean-based professional archaeologists, including African-descent Caribbean archaeologists, who could have been available for such an important research campaign, if a significant attempt had been made to recruit them.

Within this discussion of the Contractor stakeholder perspectives, it is of significance to indicate that *once the very first human remains were identified at the Golden Rock site, all work on them should have stopped, pending community and government decisions as to how to proceed further*. Not only was this appropriate protocol not done, but rather almost 70 more skeletons were removed by the contractor with SECAR approval, having little or no communication to the general public. One potential clue to this situation, may relate to the fact that in the Caribbean region there are very few large enslaved African burial grounds that have been professionally researched, and with 70+ burials, the Golden Rock site was primed to become one of the largest ever studied in the region. Conducting this Golden Rock research, significantly elevated the contractors academic status, having revealed and investigated such an impressive burial ground site. Unfortunately, this academic advantage was for the benefit of the contractors primarily, with no concern for the Community opinion and deep cultural sentiments regarding treatment of their enslaved African ancestors.

2.2 Community Inquiry process and results

The Community inquiry was considered absolutely essential for the work of the SHRC, such that we needed a clearer understanding of the opinions and suggestions of the St. Eustatius community itself, for any informed recommendations. The Community Inquiry was

designed to be conducted as a series of questionnaire interviews, conducted at daily-life locations on the island, by Statian folk themselves. The questionnaire itself consists of 10 questions, some of which could be responded to as yes or no, while other questions required more extensive responses of opinion and commentary, and all had relevant data of age, gender, and birthplace also collected (see Appendix III). There were a total of 101 interviews, conducted by 9 interviewers, at various public locations on St. Eustatius, during the period of 11-19 November 2021, which conveniently coincided with 'Statia Day' celebrations as well.

An overview summary of the Community Inquiry results is presented here, as representing a direct voice of the Statian people, regarding these matters of heritage, burials, and the Golden Rock case. We would like to be clear, that rather than a precisely statistical evaluation, which data is also presented, we have chosen to identify and highlight the broader interpretation of recurring comments and opinions, as having significance and representation of the community views. There are additionally some few qualifiers that need to be mentioned as part of the interview process, these being that all of the interviewers were women, and thereby it resulted that for gender representations, more women (62%) than men (38%) were interviewed, and also the age groups represented were primarily between 26-50 years (50%), with 17% aged 14-25 years, and 33% aged 50+ years. Some interpretations of the relationships between age and responses will be discussed subsequently. One more important qualifier, is that St. Eustatius has a large immigrant population of permanent residents, as well as Statian families having children born on St. Maarten for the hospital facilities. As a result of the interviews being conducted in public spaces, these non-Statia born residents are also included. Thus, the interviewees were 61% Statia-born, 12% St Maarten-born, 6% St. Kitts born, 5% Netherlands born, 5% Aruba born, 2% Curaçao born, and the remaining 9% were born in some other country than those noted above.

When looking at the results of the Community Inquiry (see Appendix III), one is immediately taken by the overwhelming (96%) response that specific local St. Eustatius heritage should be much more emphasized in education and community awareness. This indicates an emerging understanding by the people of St. Eustatius, that they not only have a vital and diverse heritage, but that they would like to know more about it.

We have reviewed the Community Inquiry results in two basic groups, those questions (1-5) which are more related to archaeological excavations and have specific 'yes' and 'no' response potentials, albeit there are associated commentaries for each as well; and those questions (6-10) which are only commentary and opinion responses. It is important to remember that that not all 101 respondents answered all the questions thoroughly or in a few cases at all, thus the percentage suggestions presented here, are based on those responses received for a specific question.

In regard to the broader understanding and opinion of what 'Archaeology' is and how human remains should be dealt with, the general responses were that Archaeology as a field of research was primarily favorable (78%), with some negative responses, and that it has the goal of excavating for information and as a way of understanding historical finds. However, the responses had split commentaries in regard to the excavation of human remains, with strong expressions of both positive and negative opinions regarding the removal of burials. These responses are a rather clear indicator, that the treatment of human remains is of considerable significance to the St. Eustatius people, for various reasons, and this needs to be recognized.

When asked about the SECAR specifically, the responses were 78% in favor of SECAR functions, and indicated they were doing important work for St. Eustatius by excavating artifacts and researching them. Yet when we observed the commentaries, we see that most of the respondents were not fully aware of the SECAR functions, and indeed many saw SECAR with mixed feelings, as too secretive or isolated from the community itself. Furthermore, again the issue of excavating human remains became a separate commentary for many respondents, such that they saw the scientific research of human remains as a vital contribution to heritage research, yet they insisted that very specific conditions must be strictly set for the removal of burials, also including the option to not have them removed at all.

When asked what they had heard of the specific Golden Rock site excavations, the vast majority (95%) had noted the discussions in the media, and that it involved the excavation of human remains of African ancestors. As well, there were clearly also noted, concerns about the transparency of the Golden Rock research project, and the lack of Community involvement in planning phases of the project, other than the school and public visitation days at the site during the project implementation. Another repeated comment, but not majority opinion, of the respondents was that there were concerns for the export of St. Eustatius artifacts off the island, and the exclusive participation in the excavations by foreign researchers (in the Golden Rock case, being primarily European and North American specialists).

When asked if the study of Slavery and Colonialism were topics of interests for the St. Eustatians, the responses were again primarily positive at 75%, albeit the higher frequency of non-responses for this question, may well be indicative of an avoidance strategy to discuss this matter. A redeeming aspect of these responses was that most wanted to expand their awareness of more than those two topics, and saw incorporating these two topics into the understanding of broader issues, like; way-of-life, survival, origin cultures, arrivals, and traditions/customs, in relation to the life of the enslaved Africans.

The inquiry regarding how human remains research should be handled on St. Eustatius was primarily an indication that the archaeological research of ancestral human remains was acceptable (72%), however only under certain conditions of respect and Community opinion. Nonetheless, the negative commentary responses were quite strong against the archaeological removal of burials, with the emphasis that the remains should be 'left in their place', and not be

disrespected by removal. When asked if scientific technical tests (such as DNA, Isotopes, etc) would be acceptable if conducted on excavated human remains, the responses were overall positive, with an interest to learn more details about the ancestors. However, this interests for technical research, does not automatically imply the respondents agree with the removal of ancestral remains in the first place. In most responses, the awareness of what the specific technical tests actually entailed, were lacking.

If we look at the above burial excavation-related responses from a strictly 'Statia-born' perspective (61 of 101 responses), we see that they are closely split on the issue, with 26 answers that agree (or agree with conditions) on burial excavations, and 30 answers that disagree with the burial excavations, while 5 responses had no answer. To compare, we then looked at the responses from the former Netherlands Antilles (St Maarten, Aruba, Curaçao) residents (20 of 101), and noted that 11 agreed with (or agreed with conditions) on burial excavations, and 6 disagreed with burial excavations, while 3 had no answer. It is important to consider the fact that many Statians are actually born on St. Maarten for the hospital facilities, and as such this unknown factor can affect the results of both of these comparisons. Overall, we noted that 45% of the 101 respondents agree, or agree with conditions, for burial excavations; while 46% of the 101 respondents disagree with burial excavations, and 9% were unclear in their answers.

When looking to the more commentary-based responses of questions 6-10, we immediately note that 75% of the answers supported the reburial of the human remains from the Golden Rock site, with 40% wishing to see the remains reburied at the same location, and 45% open to reburial at another location. Curiously, 14% of the respondents suggested to have the Golden Rock human remains placed on display, or reburied, at the St. Eustatius Museum. This option is of course not available, considering that international standards and practices prohibit the public display of any human remains.

There were fewer responses to the question regarding what actual policies should be in place for St. Eustatius, however there were numerous commentaries in this regard. Some of the more significant responses on this question either suggested, or demanded, that all artifacts must stay on the island (34%), better policies were needed (21%), better protection of heritage sites was needed (17%), that more locals should be involved in the research (9%), and that government, not an NGO, should handle these matters (3%). As an extension of this question, the specific inquiry of which institution on St. Eustatius should be ultimately responsible for heritage research, the percentages were somewhat surprising, yet clear. From the respondents on this question, 41% saw the Government as the primary institution responsible, with 27% seeing the Museum should be responsible, 17% seeing SECAR should be responsible, and CNSI had 7% indicated. The suggested responsibility falling on either schools, individuals, professional companies, all had less than 3% indicated.

When asked to offer any additional thoughts and suggestions at the end of the interview, the most significant responses were; that the public should be better informed regarding heritage research (44%), that there was needed greater respect for heritage remains, and the inclusion of more local workers (42%), that a Memorial for the ancestors was needed (10%), and that there should be limitations on the practices of NGOs regarding heritage research (3%).

A closer look was taken at the responses of young people, aged 17-24 to the questions that were asked. With all caution in regard to its representativeness, the statements by the younger respondents were closer examined in order to see how they deal with the past. This could be an indication of how the educational system forges an interest in history in the schools. The response of the younger generation shows that they do have an interest in the history and culture of their society. The fact that they made the effort to fill in the questionnaire is also very indicative of this interest. There is always the challenge of engaging young people to participate and to reveal their thinking through interviews. What is striking, however, is that the answers to some of the questions by this particular group were very general, sometimes very often with certain well-known clichés such as ‘having more knowledge of history’ or ‘having more knowledge of history and culture’. A large number of young people in this age category, when asked whether they were interested in topics such as slavery and colonialism, answered quite categorically no. This calls for more research into the motives of these young people and into their interest in history.

These outcomes are reflected in our recommendations concerning the Golden Rock case which are presented in the next section.

3. Recommendations #1; the Golden Rock case, lessons learned

The assignment of the SHRC was twofold, first to evaluate the Golden Rock Burial Ground specific case and make recommendations; and secondly, to provide community and expert opinions regarding cultural heritage research practices on St. Eustatius, with recommendations for changes as required by international standards. This third Section focuses on the lessons learned from the Golden Rock case. Recommendations for future archaeological research based on international standards are presented in Section 5.

During our investigation, we observed a serious dysfunctional government administrative structure present for the implementation of archaeological research in general, as well as specifically with the Golden Rock Burial Ground case. Particularly after 10 October 2010, we see a dramatic increase in both the expansion of commercial archaeology on St. Eustatius, as well as, an acceptance of a 'blind-eye' approach of communications between

Government and SECAR, with a by-passing of responsibilities for Community engagement about the research from the very beginning. While the ethical approach from all parties should have been to conduct formal community consultation and engagement, the lack of formal systems and protocols for conducting this, exacerbated the situation.

1. A new approach to the Government-SECAR-Contractor relationship is required, whereby the Government will have greater authority over implementation, including inspections, of archaeological projects, and that the Community is integrally included in project discussions from the initial phases of preparation. A fundamentally new governmental structure for heritage administration on the island is necessary (see our suggestions of a *Heritage Agency* and *Statia Heritage Center*, later in this report).

2. We recommend a form of Government screening of professionals who wish to conduct archaeological research on St. Eustatius, together with SECAR and Community consultation, having the intention that more professional representation from the Caribbean region is essential. It should not be the case, that just because someone has worked on St. Eustatius previously, they are qualified to do other projects subsequently, in particular dealing with human burials.

3. We recommend that specific culture-training preparations be given to all foreign researchers who wish to work on St. Eustatius, prior to and during their visits, this is to insure that appropriate behavior only, will be given respectfully to the community.

4. We recommend that youth educational programs, including university scholarships, to be provided to Statians, to try to fulfill many of the needed heritage positions in the future. This could also include that potentials be explored for establishment of a St. Eustatius Heritage and Archaeology university-affiliated facility on the island.

5. We recommend that close financial supervision be conducted by the Government, and holding SECAR responsible, over any archaeological research projects, including considerations of appropriate proportional value of the costs involved in the research, with the Community benefits.

6. We recommend that the excavation of any further human remains from the Golden Rock Burial Ground site be stopped, until which time those remains already removed have been properly dealt with and re-interred. We do see a general Community consent, that some further technical analyses (such as, DNA, Isotopes, etc.) could be conducted on the remains, with proper restrictions as indicated by the Community. Within this recommendation, we see the rights of the St. Eustatius Community having a priority, when considering how to deal with human remains, and from the Community Inquiry it seems there are the potential for cases whereby the removal of burials can be denied.

7. We recommend that the Government direct SECAR to locate and identify the excavated Indigenous human remains (11 burials) from the 1980s archeological campaign at

Golden Rock by Versteeg and Schinkel, and if not on-island already, these human remains to be repatriated to St. Eustatius and re-interred.

8. We recommend that the re-interment of the removed Golden Rock Burial Ground human remains, be at a separate location from the Golden Rock site, as a space of dignity and respect for the ancestors (see our innovative suggestion of a *Memorial* later in this report). Within this recommendation, we are suggesting that with community consent, any future human remains removed via archaeological mitigation and/or incidental finds, should be interred at the proposed *Memorial* as a Community space.

9. There should be more alliance with oral histories and traditional knowledge in order to gain insight into the experiences of enslaved people. Their oral histories also yield new understanding of their traditions and cultural values, and in that way also explain and record their relationship with the world they lived in.

This last recommendation concerns the fact that enslaved people have been ignored or trivialized in written historical documents, thus both oral histories done in past as well as the recent ones are required. In St. Eustatius in the 1970s, Vivian Graham, an American journalist who retired on the island, interviewed elderly citizens about their lives and that of their ancestors. Some of the collected life stories also show how people kept the memory of slavery alive. This 1970s oral history material held by the St. Eustatius Historical Foundation. In, *Statia Silhouettes* (1999), are contained a collection of 22 life histories for which the interviews were conducted in the summers of 1985-1987 by Julia Crane, an anthropologist at that time connected with the University of North Carolina (USA). During the 1980s, Rose Mary Allen then working for the Netherlands Antilles Institute of Archeology and Anthropology (AAINA) together with Eric Ayisi of the College of William and Mary (USA), conducted oral history field research in St. Eustatius. In 2015, Franklin 'Boi' Antoin of the Bonaire Foundation FUHIKUBO, digitalized the interviews by Vivian Graham as well as, those of Eric Ayisi and Rose Mary Allen. At the moment through community based workshops, oral histories and primary sources are inventoried at a national level, in order to accomplish with the safeguarding of intangible cultural heritage under the UNESCO 2003 convention.

4. International Standards for best practice guidelines

The fourth and fifth sections of this report focus on our research of international standards for conducting archaeological research and our recommendations offering potential models for the St. Eustatius Government to consider; as appropriate examples of international and regional laws, regulations and actual structural formats, for the proper implementation of future archaeological research in general, as well as, the handling of human remains.

We suggest the following existent models for consideration; see below here the Society for American Archaeology official statement on the treatment of human remains (4.1), and for Caribbean regional archaeological best practice procedures for human remains, see the IACA Code of Ethics (4.2). As well, reference has been made of the graves and sacred spaces protection law, Native American Graves and Repatriation Act, NAGPRA (1990). For the development of Historical Preservation Laws (see Jamaica National Heritage Trust Act, 1985). For relevant Netherlands references (see Rijksdienst voor het Cultureel Erfgoed, Heritage Act 2016 and NAR-55, 2017), all of the above are suggested as models. You will find more detailed information and examples used for this report in Appendix IX.

4.1 Society for American Archaeology (SAA)

4.1.1 Official Statement Concerning the Treatment of Human Remains (2021)

Archaeology is the study of the ancient and recent human past through material remains. Because archaeologists may encounter and study human remains as part of their work, the Society for American Archaeology (SAA) is providing this statement to reflect the SAA's values of stewardship and accountability in the context of work with human remains. There are differing viewpoints on many aspects of work with human remains, such as the definition of human remains, what constitutes consultation or collaboration, and ideas about best practices. This statement cannot address the specifics of all viewpoints; instead, it outlines broad principles. It is the archaeologist's responsibility to seek and incorporate the perspectives of descendant communities, affiliated groups, and other stakeholders in making decisions about how and whether to work with human remains.

Since its founding in 1934, the SAA has been dedicated to the archaeological heritage of the Americas. Because of this focus, the principles outlined in this statement apply to all aspects of archaeological work in the Americas (North, Central, and South America) involving human remains. The work covered by this statement includes, but is not limited to, excavation, research, education, curation, exhibits, and publication. While the statement is intended to apply to the Americas, it can also provide guidance to SAA members who work in other regions. By using these principles, archaeologists can avoid the harm associated with some of archaeology's past practices.

Principle 1: Working with human remains is a privilege, not a right.

Archaeologists should approach work with human remains from a perspective of ethical stewardship, responsibility, and equity, rather than entitlement, ownership, or exclusivity. Any work involving human remains should respect the views and interests of descendant communities, affiliated groups, and other stakeholders. In some cases, this may mean that work should not be done unless it is legally required.

Principle 2: Human remains should be treated with dignity and respect.

Human remains are deserving of the dignity and respect afforded to living people. This

principle applies to all human remains, regardless of ethnicity, sex, age, religion, nationality, socioeconomic status, cultural tradition, form of burial, condition of remains, or circumstances of acquisition.

Principle 3: Archaeologists should consult, collaborate, and obtain consent when working with human remains.

In each stage of work with human remains, archaeologists should make every effort to consult, collaborate, and maintain communication with descendant communities, affiliated groups, and other stakeholders. Archaeologists should consult and collaborate as broadly as possible, keeping in mind that there may be descendant communities, affiliated groups, and other stakeholders whose interests have not been previously recognized or acknowledged. Archaeologists should seek to obtain consent from descendant communities, affiliated groups, and other stakeholders for any work involving human remains.

Principle 4: It is the responsibility of the archaeologist to understand and comply with the applicable law.

Each country has its own laws and treaties that relate to work with human remains. Archaeologists should recognize the unique legal responsibilities surrounding the sovereign authority of Indigenous nations as established through treaties, court cases, and law. Legal obligations set a minimum threshold for work with human remains, but ethical obligations may go beyond the letter of the law.

Principle 5: Archaeologists should follow best practices and uphold the highest ethical standards when working with human remains.

All work with human remains must be done by individuals with the appropriate qualifications and training. Students must be carefully supervised by experienced and properly trained personnel. Archaeologists must be transparent about funding sources and seek to avoid conflicts of interest, violations of privacy, or other harm during their work and in any subsequent archiving and use of the data.

The SAA encourages its members and their affiliated institutions to develop detailed policies and procedures for the treatment of human remains during excavations, lab research, teaching, curation, exhibition, and publication, even if they do not expect to encounter human remains. The principles outlined above can provide the framework for developing these policies.

In addition, the *United Nations Declaration on the Rights of Indigenous Peoples, Principle 12*, establishes certain rights regarding Indigenous human remains and is a helpful resource when creating policies. Ethical standards for archaeological practice will continue to change. As a result, this statement will be reviewed at a minimum every seven years to ensure that it reflects the developments in laws and standards.

4.2 International Association for Caribbean Archaeology (IACA)

4.2.1 Official IACA Code of Ethics when dealing with human remains

(This IACA Code of Ethics was approved by the IACA Board in 2021, and was pending membership ratification at the 2021 IACA Congress, which has been delayed until 2022, due to Covid-19 restrictions)

Human Remains

Ethical issues with the handling of human remains primarily center around two areas:

Stakeholders Living and Dead

- The wishes and needs of living stakeholder communities should be prioritized above the concerns of science and academia.
- Human remains should be handled with respect, for example:
 - o no needless destructive sampling
 - curation, analysis, and reburial practices should be chosen as appropriate for the context
 - in certain cases, it may be important to protect human remains from view (e.g. screens shielding excavation areas, blurring of published images)

Professionalism in Bio-archaeology

- Local laws and rules for the excavation and handling of human remains should be followed at all times (e.g. Health and Safety guidelines).
- Those who excavate and analyze human remains should be properly qualified for these tasks and should follow the best practice guidelines of their discipline.
- Archaeological human remains are not property and should therefore never be bought and sold.
- Members should work against the illegal acquisition of human remains.

4.2.2 Best Practices for the Treatment of Human Remains (IACA)

Human remains should be treated with respect appropriate for the community (or communities) to which they belong. When they are excavated, high fieldwork standards should be maintained at all times. However, there are additional considerations for archaeologists where human remains are concerned:

Before Excavation

- Archaeologists should first consider whether it is necessary or desirable to excavate the remains at all. Where possible, they should make this decision in partnership with stakeholder communities. One possible exception to this rule is the rescue excavation of human remains in imminent danger of unavoidable destruction, for example by coastal erosion.

Local laws and rules for the excavation and analysis of human remains should be followed at all times.

Qualified bio-archaeologists/osteo-archaeologists (i.e. individuals with a Master's qualification or above in the analysis of archaeological human remains) should be involved in the both the planning and excavation phases of archaeological projects where human remains are anticipated.

During Excavation

When human remains are found unexpectedly, work on those remains should pause and a qualified bio-archaeologist/osteo-archaeologist should be contacted as soon as possible to advise on the correct procedures.

Proper health and safety guidelines should be followed at all times, particularly those of the country where the excavation is being carried out, but also additional precautions relating to specialist work being done (for example, when there is a biological hazard).

Project leaders should be aware that engagement with human remains can be a psychologically difficult process. They should be prepared to direct participants and stakeholders

Project leaders should consider using screens to shield the excavation site from view if it is located in a public or highly frequented space. This is a matter of respect for the dead, because members of the public should be able to choose where and how they encounter human remains. Signs can also be used to warn site visitors that human remains will be visible.

Communication with and involvement of stakeholders is very important but may not be possible in some cases (e.g. where there are safety issues). Stakeholders should be treated sensitively and in accordance with Public Engagement. Where possible, the preference is always for open communication and stakeholder involvement.

After the Excavation: Analysis

If the human remains are to be analyzed (in some cases, stakeholders may object to this), then they should be analyzed by qualified bio-archaeologists/osteo-archaeologists. The only exception to this rule is student training, and this must be carried out under the supervision IACA Members should (to the best of their knowledge) not work with or consult on human remains that have been acquired illegally (under the terms of the 1970 UNESCO Convention) or unethically, unless this work is for remediation purposes.

After the Excavation: Curation or Reburial

Human remains should be curated in accordance with local laws on reburial, as well as the wishes of the stakeholder community. Where reburial occurs, this should happen respectfully and in a suitable location and with the involvement of the community.

Where curation occurs, professional standards should be followed as closely as possible (for example, climate-controlled storage facilities). Long term curation should preferably be carried

out in the country of origin. If long term curation must occur elsewhere, permission should be acquired (for example, from a local heritage organization) and every effort should be made to maintain meaningful links with stakeholders so that the remains can return to their local context when or if facilities become available, and so that local communities can continue to have control over what happens to the remains while they are curated abroad.

In some cases, there may be multiple stakeholder groups who have differing opinions about what should happen to the human remains. Archaeologists may attempt to facilitate discussions, during which they should remember that the goals of their research are not always the most important ones.

Paperwork, photographs, site reports, results of specialist analyses, grave goods, coffin fittings, and other associated artifacts should be curated (in the long term) with the human remains to which they belong (with original copies of paperwork and photographs submitted to government, and if the excavator requires they can retain copies).

Archaeological human remains should never be considered private property, and human remains should not be bought and sold.

Sampling

Project leaders should think very carefully about what types of sampling are appropriate for the human remains in question. Sampling should follow the most recent best practice guidelines (for example, those concerning sampling for the purposes of repatriation). Samples should only leave the assemblage with express permission (in most cases, from the landowner or local heritage organization that has given permission for the excavation) and if the sample is not completely destroyed, the remains should be returned to the assemblage as soon as possible.

The same human remains should not be repeatedly sampled to provide the same data (for example, by different research groups). Curators should maintain detailed records of what has been sampled and why.

Sampling methods that hinder the subsequent application of other techniques should be avoided.

After the Excavation: Images

Photographs and (3D) models of human remains should be presented sensitively and appropriately for the context. For example, IACA does not support the gratuitous use of such photographs in a non-professional social media setting. In some cases, human remains may need to be pixelated out (for example, where there are close living relatives of the deceased).

Slightly different rules may apply in the case of a) objects made from human remains, and b) human remains that can be identified as cast-offs, for example hair. These items should be addressed on a case-by-case basis, with cultural sensitivity, and remembering that an object made from human remains still represents a deceased human being.

As archaeologists, it is our responsibility to treat past individuals and communities with respect and to prioritize the needs of living stakeholder communities above the goals of our research.

5. Recommendations #2; Guidelines for future Archaeological research

This more technical administrative recommendations section was compiled extensively by two of the SHRC members (Alexandra Jones and Joshua Torres) who both have vast experience in archaeological public administration in the Caribbean, and with additional contributions from the other SHRC members. In Section 5.1 we focus our recommendations on aspects concerning the governance of future archaeological investigations. In Section 5.2 we formulated possible guidelines for Human Remains research, while 5.3 presents systemic and administrative observations of the Statia Heritage Research Commission. Finally, Section 5.4 presents possible solutions for Community Engagement and respect of St. Eustatius's Heritage.

5.1 Recommendations for future Archaeological research governance

Based on our review of the Golden Rock case, our assessment is that the island of St. Eustatius is lacking in formal statutory and regulatory requirements--and associated policies and procedures, to efficiently and responsibly carry out archeological projects on the island in a way that ensures preservation of cultural resources, project oversight, and appropriate community engagement/public education. To address this issue, we submit these recommendations for protocols and standards that can be used as a model by the St. Eustatius Government.

Any given undertaking, funded by the government and with the potential to impact natural or cultural resources should be reviewed and evaluated for such impacts that pose a threat to the island's natural environment or cultural heritage. Investigations to understand potential impacts should be conducted to identify and document resources, evaluate their importance and significance, and convey that information to the public for their input on the project. Alternatives for protection or mitigation can then be developed. Throughout this process, the community should be at the table for being able to understand the impacts of the project and to have a say in the implementation/outcomes/treatments.

Investigation needed to document and assess these potential impacts requires research and fieldwork by qualified professionals under review of the government. There should be a permitting and vetting process of contractors and independent researchers that may impact natural or cultural resources. There should be a permitting process for conducting work that

is transparent and guided/reviewed by professionals. These permits, and the documentation related to review and subsequent approval or denial, shall become permanent government records.

Any scope of work calling for investigation, recording, and evaluation of cultural resources, must pay attention to ALL CULTURAL RESOURCES, not just specific cultural groups or site types. They must be prepared to identify, record, and evaluate pre-colonial and historic archeological sites and historic and architectural properties as well. These include all such sites that are 50 years old or older, including historic cemeteries.

We recognize that the government of St. Eustatius needs to have appropriate policies, and guidelines in place that link with preservation law and mandates. The steps to implement this policy needs to include/address the following:

An identified Legal Authority to further develop law and implementing regulations and policy to address recommendations and preservation processes identified in this document.

Public hearings and timely notification of projects that will provide details regarding, scoping, and funding, in an open and transparent manner.

Projects that require disturbance of the natural environment and cultural resources must be reviewed by the St. Eustatius appointed Legal Authority. Studies must be conducted to document impacts to resources writ large. Regulation and policy during this process must always address; How is the community engaged? How are recommendations received/reviewed and commented on by all stakeholders?

Once a project has been identified that may have an impact on cultural resources, there are necessary steps that need to be taken to identify resources that may be impacted, their condition/integrity, and significance. This is typically done through Phases I-II archeological projects that are discussed in Appendix IX. These reports and the recommendations that are produced through them, should be the subject of deliberation among all stakeholders in the development of mitigations for sites/resources that will be impacted and/or lost. It is the lead agency's responsibility to ensure the veracity of recommendations in the reports and to use that information in a clear and transparent way to preserve and protect significant island resources for future generations.

Develop government policy to address; the process for reviewing reports, documents, and recommendations for sufficiency. The development of standards and guidelines for permitting and vetting qualified individuals to lead fieldwork.

Develop clear processes of community involvement; these need to be codified to ensure that a fair, equitable, and transparent process in decision making is completed. Such involvement and input would become part of the official government record on the project.

Mitigation/Data Recovery (Phase III), if required, should be developed in tandem with the community and experts from the beginning stages. The results of the mitigation should include a plan for positive and meaningful educational and community input/involvement.

To summarize here, and allowing the Appendix IX details be the reference, the sequence of work in consideration of cultural heritage resources to be affected by government projects should be efficient, economical, and justifiable. Briefly, the sequence is normally this:

1. Consult with Descendant Communities when appropriate and/or mandated by the Project Scope of Work or Programmatic Agreement.
2. Locate and record basic information on all cultural resources that are 50 years old or older in a project area.
3. Test archeological sites to see what is below the surface.
4. Decide which sites have the greatest potential for providing significant information concerning pre-colonial and historic lifeways and cultural processes. Provide adequate support for these determinations, including use of documentary research for historic archeological sites.
5. Turn in completed archeological and historic structure inventory site forms to the government agency representative.
6. Arrange for appropriate curation of all artifacts and documents. Turn in a completed Project form to the Government agency representative at the time, notifying that the artifacts and documents are placed into curation.
7. Mitigation in some form is required in all cases for sites in which human remains are expected or encountered, without exception.
8. Carry out mitigation measures
9. Arrange for appropriate curation of all artifacts and records.
10. Publish results.

5.2 SHRC GUIDELINES for Human Remains research (Bio-archaeological)

Forensic Documentation of human remains that have been discovered during archeological field projects and other ground disturbing activities, and bio-archaeological studies that use forensic information, have the potential to reveal many kinds of information about past populations. Today, however, regulations require that *descendent*

groups as well as others who may not be forensic specialists play significant roles in determining kinds and manner of investigation of human remains.

The likelihood that human remains will be reburied after a project is completed, is an additional factor that should be taken into consideration in choosing the kinds of information gathered during documentation procedures, and the manner in which the data are archived.

Bio-archaeological studies are most fruitful as population studies. Since human remains are often discovered as individual burials or small group cemeteries, the importance of any information gathered during any single forensic study is significantly enhanced with the use of comparative data gathered previously from other studies. Each individual study also has the potential to contribute to future studies, even if the human remains have been reburied, if the data are comparable.

In order to enhance the value of each forensic study and lay the groundwork for future synthetic work that can draw on previous studies, forensic documentation should follow a standard and through protocol laid out in *Standards for Data Collection from Human Skeletal Remains*, assembled by Buikstra and Ubelaker (1994). Raw data collected during documentation should be preserved and made fully accessible through appropriate archival means. Copies of data sets, including photographs when allowed, should be deposited with the project data when it is archived with the Heritage Inspector other appropriate repository, and the location of original data should be indicated in the written report.

Osteological data collection. Information categories that at minimum should be collected in a forensic documentation study include but are not limited to age and sex, likely racial or cultural group, traumatic injuries, pathological lesions, measures of childhood stress, indicators of life experiences and work patterns such as unusual muscle development or skeletal anomalies, dental wear and caries frequencies. Unanticipated skeletal and dental anomalies should also be documented, and photographed if possible. These kinds of information can be collected in a manner that is non-destructive to human remains.

Baseline information should be collected and described in a standardized format accessible to future researchers and presented in standard tabular and descriptive formats in the final report. Examples of such data presentations are found in Rose 1984, Burnett 1993a, and Tine and Tieszen 1997. The methodology used in collecting information should be described in the report, and each individual should be accorded a full skeletal and dental inventory.

Synthetic Analysis: Dietary regimes, adaptation patterns, population and individual life histories are all research domains that are appropriate areas of inquiry. The findings from each individual study should be compared to and synthesized with previous studies. Some recent examples can be found in Tine and Tieszen 1997 and Burnett 1993b. Information from the bio-archaeological study should also be integrated into the results of the investigation in the final report.

Special analytical techniques. Various isotope and element analyses, including carbon 14, strontium and oxygen, and stable carbon, are important techniques for addressing these and other questions about past cultures. Since these measures require the destruction of some human tissue, it is important that consultations among the responsible parties, including descendant groups, clarify whether these kinds of analyses might be permitted early in the consultation period. This will help provide that recovery methods and analyses protocols applied to human remains are appropriate if such remains are encountered.

At present, DNA analysis of archeological human populations is in its infancy in the Americas' archeology. However, since DNA studies may be useful for a wide range of inquiries in the future, it may be appropriate for the responsible parties to enter into consultation over the possibility of establishing data banks under certain conditions in anticipation of future use.

Summary Human Remains

When documentation and analysis of human remains is part of an archeological project, it is important that basic information is gathered in a comprehensive, uniform, and standardized manner and preserved for future reference and use. The results of any documentation should be integrated into the report on the larger study, and should be synthesized with previously gathered information. Bio-archaeology is an evolving discipline and it is appropriate to provide for the likelihood that research methods and goals will change in the future.

Once again, we refer to the Appendix IX, as a thorough and precise reference guide for the specific technical and administrative details of the practices identified above, which includes actual examples of application and permit forms, report writing formats, and responsibilities of all stakeholders.

5.3 Systemic and Administrative opinions of the SHRC

The SHRC has considered the current systemic and Government administrative processes, when handling matters related to all heritage programs, including archaeology, as having serious deficiencies. We see the current administrative structure as being a very

disconnected set of separate entities, competing for funding/attention to attain the same goals of cultural heritage preservation and respect for St. Eustatius heritage, yet often with political-personal issues complicating these relations.

Our recommendation is to re-structure the entire heritage sector of St. Eustatius Government administration, particularly involving the SECAR, Monuments Council, Museum, and perhaps other heritage related entities (which could also include natural heritage as well as cultural heritage). Such a restructuring should include a central administrative facility for all these heritage entities (for example a ***Statia Heritage Center***, or whichever name the community feels best with), so that the St. Eustatius public and visitors can find answers to heritage questions at one centralized location. However, community engagement and input is necessary before such a step can be taken. Furthermore, the administrative aspects for managing these various heritage entities, including necessary inspections and monitoring, also needs to be centralized under a single government department specifically for heritage issues. Currently, the St. Eustatius Department of Culture handles many of these matters, yet they have significant limitations of expertise, general staff and facilities. We see the need for an identified Government *Heritage Inspector* position, as a qualified professional who will supervise, monitor and advise on any heritage projects conducted on St. Eustatius. A broader eventual application of the proposed Statia Heritage Center, should also include an educational program for young Statians to be trained in the various heritage fields, and thus to become potential staff at the center, directly representing the local community.

Considering that all the mentioned heritage entities are primarily government subsidized, the creation of a centralized Statia Heritage Center with Community involvement and consent, would also further assist with some overlapping operational cost reductions. Nonetheless, the St. Eustatius Government will be required to substantially increase its investment in Heritage, with these recommendations for facility, staff, and functional changes. Yet, is it not Heritage itself, which is the heart and soul of Statian identity, including international awareness of St. Eustatius, a worthy cause for investment?

5.4 SHRC Innovative solutions for Community Engagement and respect of St. Eustatius's Heritage

The SHRC has compiled these innovative solutions as potential means to deal with the factors of this specific case and beyond, with the understanding that our recommendations can, and hopefully will, have both long-term and broad regional impacts.

A first innovative solution is for the St. Eustatius Government to create a **Community Notice** public information format in the media, whereby when any heritage research project is being considered, be it all forms of cultural heritage projects, the public is thoroughly informed at the very initial phases of consideration and preparation. This format is also created as a voice of inquiry and concerns of the public, regarding any specific investigations and/or procedures being implemented. As well, via this Community Notice format, ongoing updates of the research process and assessments can be made public. We foresee this Community Notice format as being conducted via local newspapers, radio, social media, word-of-mouth, and the proposed Statia Heritage Center, including notification of the precise contact person in Government for community comments.

A second innovative solution, which has direct connections to the Golden Rock case, as well as any future heritage research cases, is the creation of a Memorial Space dedicated to Respect of the ancestors, as either a public park or art structure, where honor is given to any historical human remains removed via archaeological investigations, or even including incidental burial finds. We feel that a public park with benches would well serve this purpose, having a place of quiet serenity and solemn respect for St. Eustatius's ancestors, as well as having space for heritage celebration events allowing the community to rejoice. A review of the recent proposals by the Barbados Government to create in association with the Newton Enslaved African Burial Ground, a national heritage district including a memorial to the African Ancestors, a museum and an archival research center may provide a useful model for consideration (see <http://gisbarbados.gov.bb/blog/prime-minister-announces-creation-of-barbados-heritage-district/>). With Community consent, any archaeologically mitigated human remains would be re-interred at this Respect Memorial (it should be named by the Community) location, with dedication events when any re-interments are made. If desired by the community, the separation of specific groups (re. religious, ethnic, etc.) within the memorial space can be accommodated, as agreed to by the community. It is further our opinion, that considering when the exhumation of human remains is deemed necessary via archaeological mitigation, and after community approval, specific technical tests (re. DNA, Isotope, etc.) can be conducted on the remains prior to re-interment at the Respect Memorial. We also feel that a specific maximum time limit (for example six months) should be allowed between removal and re-interment, however once re-interred at the Memorial, the human remains should not be removed again. There are various positive arguments for this Memorial approach to dealing with the human remains recovered through mitigation work; firstly, to show respect for the ancestors in a dignified setting; secondly, to allow necessary development plans for the island to continue; and thirdly, as a respectful means to deal with the costly and often difficult methods required of human remains storage.

A creative impression by the SHRC Chair, is presented here simply as a suggestion, for it would ultimately be the people of St. Eustatius who must decide;

Perhaps a park space having a massive art sculpture representing a Silk Cotton Tree base, with its spreading high roots, broad central trunk, and various separated coves, as grown for centuries from the deep vital soil of St. Eustatius. Creating a link from the ancestors until today, the high root walls would have many hollowed openings in them, of various sizes and forms, awaiting their role to house the ancestor's remains. Once a re-interment is completed their hollow is sealed, identified, and remembered in respect as part of the Ancestral Legacy of the St. Eustatius Community. Jay Haviser, 21 December 2021

Acknowledgements

The SHRC would like to sincerely thank the St. Eustatius Government, in particular Commissioners Alida Francis and Claudia Toet, for their vision and foresight to ask the opinions of regional professionals and institutions such as IACA, to work together with their community, all having experience in the fields related to this report. As well within the government apparatus, we would like to thank the director of the St. Eustatius Department of Culture, Natasha Radjouki, for her tireless efforts to assist with the Community Inquiry. We give thanks to all of the key stakeholder representatives, including SECAR and the Contractors, who participated freely and openly in our SHRC interviews. As well, all members of the SHRC are sincerely thanked for their time and energy to consider this important case. Within the SHRC group itself, special thanks go out to the St. Eustatius community leaders, Ishmael Berkel, Paul Spanner, historian Raimie Richardson, and psychologist Xiomara Balentina, who stayed with the group the entire process, providing valuable suggestions and ideas for the SHRC to evaluate and incorporate.

The greatest acknowledgement with sincerest appreciation, goes to the People of St. Eustatius themselves, not only those who worked to achieve the Community Inquiry, but everyone who has been following this case. St. Eustatians showing their concerns for these heritage issues, and who have patiently awaited the work of this SHRC commission, trying to find solutions that are in agreement with the opinions of the St. Eustatius Community, and can allow Heritage to be recognized and significantly elevated as a central aspect of St. Eustatius development and St. Eustatians identity.

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Appendix I. St. Eustatius Executive Council Decree No.2, 17 September 2021



**THE GOVERNMENT COMMISSIONER OF THE PUBLIC ENTITY
SINT EUSTATIUS
Enacting as the Executive Council***

**DECREE OF September 17, 2021
No. 02**

Subject : Installation of Statia Heritage Research Commission;
 On Account of : Legal Affairs, which advises to install the aforementioned commission and to approve the proposed honorarium;
 Considering : That there is an urgent need to have research done and a policy developed for practices in handling artifacts and remains falling under cultural heritage;
 Proposed by : Ms. M.A.U. Francis, portfolio holder of Culture;
 By Virtue of :

HAS DECIDED

in their meeting on September 16, 2021, to

1) install the Statia Heritage Research Commission (SHRC). There are two key focus points for the SHRC;

1. Evaluate the Golden Rock Burial Ground specific case, and make recommendations.
2. Provide community and expert opinions regarding cultural heritage research practices on Statia, with recommendations for changes as required by international standards.

This SHRC mandate is to involve the review of Government, Community and Stakeholder opinions, from both local and international perspectives, for both the resolution of this particular case, as well as, for guidance on how to make adjustments to governmental practice and policy, to prevent such situations in the future;

It is further mandated that within these SHRC advices, Statia Community views of the cultural and heritage value of the Golden Rock Burial Ground site, are to be sought to understand how the community feels is the best approach for the re-burial and respect, of these Statian ancestors;

2) approve the following persons as part of the SHRC, of which mr. Jay Havisser will be the chairperson:

<u>Name</u>	<u>Profession</u>	<u>Background / Country</u>
Rose Mary Allen	Anthropologist	University of Curacao (Curacao)

*Conform article 6 law recovery provision Sint Eustatius



Corinne Hofman	Archaeologist	Leiden University/KITLV (The Netherlands)
Ishmael Berkel	Community leader	Historical Foundation founder(Statia)
Alissandra Cummins	Heritage Specialist	Director Barbados Museum (Barbados)
Luc Alofs	Anthropologist	University of Aruba (Aruba)
Alexandra Jones	Archaeologist	Archaeology in the Community (USVI, USA)
Raimie Richardson	Historian	Education specialist(Statia/Netherlands)
Joshua Torres	Archaeologist	US NPS (USA; vice-Pres. IACA)
Richenel Ansano	Anthropologist	Heritage consultant (Curacao)
Matthieu Ecrabet	Archaeologist	Community archaeology (Martinique)
Reg Murphy	Archaeologist	Archaeologist (Antigua)
Teresa Leslie	Anthropologist	Concerned Stadians Group (Statia)
Paul Spanner	Community leader	Citizen (Statia)
Xiomara Balentina	Psychologist	Mental Healthcare (Statia/ St. Maarten)
Jay Havisser (Chair)	Archaeologist	President IACA (St. Maarten)
Kevin Farmer	Archaeologist	Barbados Museum (Barbados)
Natasha Radjouki	Civil servant	Public Entity of St. Eustatius Dept of Culture (Statia)
		*observer

- 3) allocate culture funds, to be utilized to support the tasks of the commission. This budget will also cover travel and accommodation costs and per diem costs for the professionals who will be required to travel to Statia to stimulate the community engagement process among other things;
- 4) approve as a form of appreciation for the effort the experts are making to assist in this matter a one-time honorarium of \$5,000.00 for the chairperson and \$ 2,500.00 per member, except the Public Entity Observer.

The Government Commissioner*,

Ms. M.A.U. Francis

The Island Secretary,



Mrs. M. A. Dijkshoorn

*Conform article 6 law recovery provision Sint Eustatius

Appendix II. Statia Heritage Research Commission (SHRC)

<u>Name</u>	<u>Profession</u>	<u>Background / Country</u>
Rose Mary Allen	Anthropologist	University of Curacao (Curaçao)
Luc Alofs	Anthropologist	University of Aruba (Aruba)
Richenel Ansano	Anthropologist	Heritage consultant (Curaçao)
Xiomara Balentina	Psychologist	Mental Healthcare (Statia/ St. Maarten)
Ishmael Berkel	Community leader	Historical Foundation founder(Statia)
Alissandra Cummins	Heritage Specialist	Director Barbados Museum (Barbados)
Matthieu Ecrabet	Archaeologist	Community Archaeology (Martinique)
Kevin Farmer	Archaeologist	Barbados Museum (Barbados)
Jay Havisier (Chair)	Archaeologist	President IACA (St. Maarten)
Corinne Hofman	Archaeologist	Leiden University/KITLV (The Netherlands)*
Alexandra Jones	Archaeologist	Archaeology in the Community, NGO (USVI)
Teresa Leslie	Anthropologist	Concerned Statians Group (Statia)
Reg Murphy	Archaeologist	Archaeologist (Antigua)
Raimie Richardson	Historian	Education specialist (Statia/Netherlands)
Paul Spanner	Community leader	Prominent Citizen (Statia)
Joshua Torres	Archaeologist	U.S. National Park Service (USA; vice-Pres. IACA)
Natasha Radjouki	Civil servant	Dept of Culture (Statia) as Observer**

*withdrew from the SHRC in December 2021

**participating as an Observer in the SHRC

Appendix III. Community Inquiry format and summary

As noted previously, this Community Inquiry was conducted under the supervision of the Head of the Department of Culture for the St. Eustatius Government, Natasha Radjouki, however she was assisted by nine women from the St. Eustatius Community who conducted the actual interviews in the public spaces. The SHRC Community Inquiry interviewers, who are greatly appreciated for this help, were; Anica Marsden, Janella Fletcher, Marcella Marsden, Patsy Blijden, Riana Bennett, Rita Hassell, Sharminda Gibbs, Michelle van Putten, and Xiomara Balentina.

SHRC Questions for General Public – St. Eustatius

The interviewers give a brief explanation of this SHRC inquiry prior to asking the questions.

A diversity of personal backgrounds and perspectives is best from the interviewees.

The names of selected interviewees, are to remain fully confidential, however age, gender and birthplace, are requested. Please try to keep the responses as concise as possible.

Interview; Date: _____ Location: _____

Interviewee; Age: _____ Gender: _____ Birthplace: _____

Questions:

1. What do you know about Archaeology, and what do you think about archaeological excavations of ancestral remains?
2. Have you heard of SECAR? Do you know what type of work they do, and how do you feel about their work?
3. Have you heard about the archaeological excavations at the Golden Rock Plantation (airport) prior to today? If yes, what have you heard?
4. Are slavery and colonialism topics that you are interested in? What aspects do you find important to study, regarding the history of enslaved peoples of Statia?
5. How do you feel about the archaeological/scientific research of ancestral human remains on Statia? Would you like to know more about the analysis techniques (DNA, isotopes) the archaeologists want to do on the skeletal remains? Would these analyses be acceptable for application to archaeological human remains on Statia?
6. What do you think should eventually happen to any excavated human remains of Statia's ancestors? What are for you, any valuable rituals to give respect to these remains? Do you want the remains to be reburied, if yes, at the same location, or somewhere else on the island?
7. What are acceptable policies, which you think should be put in place in order to deal with the history and culture of Statia?
8. What institution(s) do you think should be ultimately responsible for professional and ethical archaeological research on Statia?
9. What should be the main topics about Statia's heritage taught at different school levels on the island? Are you interested in the history of Statia's ancestors?

10. Please share any other thoughts/concerns/suggestions you might have about archaeological excavations on Statia.

Thank you very much for your important contribution to this discussion about Heritage Research on Statia.

Interviewer: Name: _____ Date: _____

SHRC Community Inquiry results summary

Survey conducted 11-19 Nov 2021, directed by Dept. Of Culture Nasha Radjouki

Total Interviews: 101 Female: 63 (62%) Male: 38 (38%)

Age groups: 14-25= 17 (16.8%) 26-50= 50 (49.5%) 50+= 34 (35.7%)

Birthplace: Statia= 61 (60.4%) SXM= 12 (12%) StKitts= 6 (5.9%) Ned= 5 (4.9%)

Aruba= 5 (4.9%) Cur= 2 (2%) Suriname= 2 (2%) Other 7 (6.9%)

Question responses:

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Q1 -	79 (78.2%)	22 (21.8%)	good-14 (13.9%) bad-5 (4.9%) not for burials-14 (13.9%)
Q2-	78 (77.2%)	23 (22.8%)	good-20 (19.8%) too secret-13 (12.9%) thought closed-3 (3%) ok, but not to dig burials-3 (3%) don't know 3 (3%)
Q3-	96 (95%)	5 (5%)	heard of burials-80 (79.2%) too many foreigners/export of materials-10 (9.9%) should have stopped sooner-4 (3.9%)
Q4-	74 (74.7%)	25 (25.2%)	majority interests in diverse aspects of heritage
Q5-	72 (72%)	28 (28%)	should leave burials alone-27 (27%) Ok to do tests but with limitations-22 (22%) no DNA work 2 (2%)
Q6-`	49 (81.6%)	11 (18.4%)	reburial-76 (75.2%) display at museum-14 (13.8%) Rebury at same loci-40 (39.6%) Rebury at other loci-45 (44.5%)
Q7-			artifacts must stay on island-34 (33.6%) better policies needed-21 (20.8%) protect sites more-17 (16.8%) more local involvement-9 (9%) no burial removals allowed-5 (4.9%) govt not NGOs to handle-3 (3%)

Q8- Govt.-41 (40.6%) Museum-27 (26.7%) SECAR-17 (16.8%) CNSI-7 (6.9%)
local people/schools-3 (3%) professional companies-2 (2%) new center-2 (2%)

Q9- Statia local culture/history-97 (96%) emancipation-2 (2.3%) values-1 (1.1%)

**Q10- Better informed public-31 (43.7%) More respect needed-25 (35.2%) need a memorial
7 (10%) more local workers-5 (7%) limit NGOs-2 (2.8%) new center needed-1 (1.4%)**

Please note that the percentages are presented as the percent of the responses to that particular question, as some questions did not get all 101 responses.

Appendix IX. Technical suggestions for archaeological best practices

Precise Guidelines for Archaeological Research and Excavation

1. All persons/organizations/institutions wishing to conduct archaeological work in St. Eustatius should contact the St. Eustatius government agency representative for a permit application. Relevant Application Forms and related instructions may be obtained from this agent. Where there is one main project but several research papers /thesis to be generated, a main proposal must be submitted together with a proposal for each individual research activity.
2. The St. Eustatius government agency representative in considering each application must be satisfied in relation to the following:
 - a. The status of the applicant. (E.g.- a representative from an archaeology firm, an organization, and/or an individual which must be affiliated with a non-profit educational institution.)
 - b. Competence of the directors of:
 - (1) the project,
 - (2) field operations,
 - (3) finds processing,
 - (4) conservation,
 - (5) environmental research and physical anthropology.
 - c. Adequacy of staff on project.
 - d. The applicant's ability and willingness to train local staff to be involved in the project.
 - e. The applicant's financial ability to properly fulfil the excavation and conservation requirements of the project; and
 - f. Any other factors considered by the St. Eustatius government agency representative to be relevant.
3. In the event that the St. Eustatius government agency representative is satisfied that the factors in Paragraph 2. Hereof have been fulfilled by the applicant, the St. Eustatius government agency representative may enter into a contract with the applicant to oversee and monitor the applicant's archaeological research activities under the following conditions:
 - a. The applicant should provide training for Statians inclusive of a field school, relevant certificates to be given on subjects covered and practical work done.
 - b. The applicant should pay to the St. Eustatius government agency representative, certain administrative costs as determined by the St. Eustatius government agency representative.

- c. Copies of all logs, diaries, maps, catalogues, primary and secondary materials, and sources generated by or used in research to be deposited with the government representative on a periodic basis to be agreed on beforehand.
- d. Copies of all photographs and slides (numbered, catalogued and described) to be deposited with the Trust on a periodic basis to be agreed on beforehand.
- e. The applicants should provide the St. Eustatius government agency representative with regular reports on the progress of excavation and the overall research project. The reporting schedule will be based on the individual project and will be agreed on beforehand. Projects that will have field seasons of more than one month will usually be scheduled for monthly reports. Fieldwork will not be permitted to continue unless all documentation is submitted at the agreed date.
- f. The applicant will have total rights over his research material for up to three years after he has completed his excavation and research, after which the St. Eustatius will reserve the right to use and/or publish this material for the benefit of the Statian people.
- g. All artifacts recovered from these excavations remain the property of the respective owners of the excavation sites (where the land is owned by the St. Eustatius Government, the artifacts remain the property of the people of St. Eustatius). Therefore, after each excavation season, a final inventory of artifacts must be established. Permission may be given by the St. Eustatius government agency representative and the relevant owners of sites, for the removal of artifacts from the island in the event that further research on and conservation of the artifacts needs to be done by the applicant. These artifacts must be returned at an agreed date. Decision on removal will be made only after consultation with the Technical Director of Archaeology. Permission will be granted only in very exceptional cases.
- h. The St. Eustatius government agency representative, where possible, may provide accommodation at a cost to be determined by the St. Eustatius government agency representative.
- i. Where archaeological excavations are to be conducted, there must be at least one representative of the St. Eustatius government agency representative present at all times to monitor and assist in providing general, technical and logistical support. Where this representative is used the execution of the work program this cost must be borne by the applicant. In large projects additional St. Eustatius government agency representative staff may be necessary e.g. Finds and Conservation personnel.
- j. When a contract is entered into with the St. Eustatius government agency representative for archaeological research to be conducted in a designated area, research or excavation outside of the designated area is prohibited.

- k. All project proposals submitted to the government should have the following components as outline in the reports section of this plan. In addition, include:
- A list of Participants in the project, their CV's and a list of three references. At least one reference from the applicant's immediate Faculty Board should be submitted.
 - Funding Proposal: funding sources, amounts granted together with confirmatory letters are included under this heading and should be submitted.
 - Permission to research on property which is not owned by the St. Eustatius Government. Copies of letters of permission from landowners to conduct research on their property must be submitted.
- l. The costs to be paid to the St. Eustatius government agency representative in relation to the project are related to individual research papers. Each research person who will be writing a thesis/research paper from the project should be so noted. The cost will be calculated on the basis of individual research papers.
- m. Extension of the contractual periods will only be considered if the applicant can produce sound reasons why he/she was unable to complete the project within the agreed time.
- n. The St. Eustatius government agency representative will not enter into subsequent contracts with a previous applicant to conduct archaeological research until and unless the St. Eustatius government agency representative receives a written report on the previous phase/year's research, including copies of all primary documentation, bibliographies, and a complete financial statement giving a breakdown of expenditure on for example, labor, transportation, food, vehicle repairs, gas, shipping, accommodation, and customs duties.

Model Permit Forms;

ARCHAEOLOGICAL RESEARCH ON ST. EUSTATIUS: APPLICATION FOR PERMIT (Information and instruction)

NOTE: The St. Eustatius Government welcomes scholars in all fields and requires that all research ventures in St. Eustatius have ADEQUATE financial and professional support. Applications should be made at least six (6) months in advance in order to give sufficient time for all application information to be verified before permit is issued. Insufficient or wrong information may result in rejection or delay in the issue of permit.

Application should include:

1. NAME (Provide full name and position and highest professional and/or academic qualification and institution from which it was earned).
2. INSTITUTIONAL AFFILIATION (Provide name and address, the period of affiliation, telephone and FAX numbers).
3. RESEARCH PROJECT TITLE AND OBJECTIVES (1-2 pages; Name of project, research area, describe background of research, specific questions to be addressed etc., dates of the research - provide an itinerary or schedule)
4. RESEARCH DESIGN (Methods to be used to attain stated objectives note theoretical and practical aspects of the approach)
5. FIELD TRAINING (1 page; How will St. Eustatius benefit from the project?)
6. CURRICULUM VITAE (Attach a list of participants and CVs including your own).
7. FUNDING PROPOSALS (1 page or more if necessary)

(List names and provide full address, telephone and email of persons or institutions contributing towards the specific phase(s) of this project - with dates where relevant; indicate the exact amount of contribution) Note: these may be verified. Only adequately funded projects will be approved for permit. Funding needs should take into account: (a) Conservation fees(b) Finds storage fees(c) Use of Divisional staff on site(d) Publication of reports

8. PARTICULAR LOCAL INSTITUTIONS (1 page)

(Provide names and addresses of affiliated local institutions; attach a letter or request a letter form the institution confirming and indicating the extent of connection, contributions, etc.) This is very important for your application.

9. PREVIOUS RESEARCH IN ST. EUSTATIUS (1 page)

(List of any previous research in St. Eustatius in the last three years; indicate the location of data; have reports been submitted to the St. Eustatius Government agency representative? If not state reasons or attach copies with this application. Note that submission of reports is a major condition for the renewal of permit)

10. REFERENCES (1 page)

- (Provide names of participants in the project, their CV's, titles institutional affiliations, addresses, phone and email of at least THREE people who can comment with insight on

the professional and personal qualification of each Principal investigator on the project - do not request a letter from any of them).

11. SIGNATURE

(Signature indicates that you certify that all information provided in the application is correct: Kindly check and make sure all details are accurate before sending it in for consideration).

GUIDELINES

1. Procedure

- a. Upon request and payment of US \$--- fee the Divisional Guidelines for Application and or Application for Permit form is sent to the permitting agency for review.
 - Application is review by three experts and their approval recommendation made for approval/denial
 - Application reviewed by government planning official and recommendations made for approval and denial
 - Recommendations are sent to the relevant government official for final approval or denial
- b. Upon returning the application, it is assessed:
 - If accepted, a contract is sent.
 - If it is not accepted, a written statement is sent to the proposer explaining why.
- c. The contract is signed before work begins.

2. Fee Structure

QUALIFICATIONS FOR ARCHEOLOGISTS

Archaeologists working on projects should meet the following professional qualifications The minimum professional qualifications in archeology are a graduate degree in archeology, anthropology, or closely related field plus: (1) At least one year of full-time professional experience or equivalent specialized training in archeological research, administration or management; (2) At least four months of supervised field and analytic experience in general Caribbean/ St. Eustatius archeology; and (3) Demonstrated ability to carry research to completion. In addition, to these minimum qualifications, a professional in pre-Colonial archeology shall have at least one year of full-time professional experience at a supervisory level in the study of archeological resources of the pre-Colonial period. A professional in historic archeology shall have at least one year of full-time professional experience at a supervisory level in the study of archeological resources of the historic period. The PI of the project shall also be a member in good standing with the International Association for Caribbean Archaeology.

CURATION

The results of archeological investigations, including artifacts, field records, laboratory records, photographs, and any other documentation, must be curated according to government standards in an appropriate repository where they can be consulted by future researchers and other appropriate parties. Plans and budget requirements for preparing collections and records for acceptance at an appropriate curation facility must be part of the planning process so that appropriate time and money is available to complete this process. For every archeological project, there should be a collection plan for the disposition of archaeological objects and human remains (if applicable). There must be curation standards set in place and formal plans made and documented as part of the Scope of Work for every archeological project.

CONSULTATION

All government undertakings/projects are required to consult with community stakeholders regarding the nature, treatment of, and documentation of those resources. This consultation should be government lead as the lead agency, between appropriate governing officials or their duly appointed representatives. The record of this consultation and public meetings must be formally documented to become part of the public record.

Archeologists conducting the research are expected to be aware of the responsible parties engaged in consultation and to know what their responsibilities are with regard to communication with government representatives.

RESOURCE PROTECTION

We recommend policies and procedures be set forth codifying the constraints and procedures required to disinter human remains or burial goods and furniture from unmarked and marked graves, and to document and curate (as appropriate) the human remains and burial goods and furniture.

These procedures require issuance of a permit from a granting government agency in order to permit the disinterment of human remains, and agreements among the government, landowners, archeologists, and descendant communities regarding disinterment and subsequent treatment protocols. Archeologists undertaking archeological work are expected to become familiar with these procedures and requirements before beginning work. *Human remains should not be moved from their discovery location before Law Enforcement representatives, landowners, Agency representatives, and appropriate descendent communities are consulted.*

Policy/Law should be put into place that prohibits damaging, or removing artifacts from, archeological sites on private or state lands without landowner permission. Depending on the

amount of loss or damage, penalties for violating the act can rise from misdemeanor to felony levels. If archeologists come upon evidence of recent or ongoing damage to archeological sites in the course of their work, they should consider this a possible crime scene and notify the appropriate landowner and agency official of the discovery. Damage should also be described on appropriate archeological site forms as part of the documentation process. The U.S. Archaeological Resources Protection Act of 1979 provides a useful example for archaeological resource protection and civil penalties for violations.

RECORDS CHECKS

Investigations of cultural resources in an area must begin with a review of information on sites and structures already on record. Except in unusual circumstances, this research should be completed before doing any fieldwork since it obviously will provide guidance for the archeological work to follow. This information and a current literature search/review is required in the permit Research Design in the Archeological Permit Application

Historic sources: County histories, gazetteers, and historical journals are useful sources for information on potential historic archeological sites.

Cemeteries: All burials, burial grounds, and/or cemeteries older than 50 years are considered archeological sites.

Local Informants: Local individuals are often excellent sources of the location and original configuration of both pre-colonial and historic sites.

LITERATURE SEARCH

Pertinent written sources on the project area must be consulted in order to place cultural resources in their appropriate context. The bibliography of any recent archeological work in the project area should also be a guide for the background research on written sources.

Any report on a literature search should include a summary of previous archeological or historic resource work in the area, a review of what is known of the pre and post-Colonial history of the project area (NOT of the whole state unless there is something relevant), and an evaluation of the usefulness of the published sources for providing information on cultural history. A literature search report should include summary information from the Records Check, and a bibliography should be produced that is exhaustive for the project area.

OVERVIEW

All reports require some sort of background section, but a major Overview Report (Phase Ia) on a project or geographical area which involves a detailed literature search, map analysis, and records check may often be useful or required for large areas. Such an Overview Report normally should include, in addition to the summaries and evaluations discussed above, recommendations for areas or topics for future study.

The most recent archeological reports, however large or small, may contain information which updates the cultural sequence for the area.

Unless specifically required by the sponsor, Overview Reports do not include fieldwork., this must be noted in the report, but the site would not necessarily be visited to update that information. Also, in most cases, an Overview Report is not written in enough detail to allow for a detailed understanding of the potential impacts of the proposed undertaking.

Appropriate categories of information which should be included in Overview Reports are abstract, management summary, introduction and description of study (including appropriate maps), effective environment, research goals and strategy, methods of data collection and analysis, summary of current knowledge, inadequacies in current knowledge and recommendations for additional worksite management options, research tools available, references.

FIELDWORK ARCHEOLOGICAL SURVEYS

Archeological surveys (Phase I) collect are designed to identify and document the vertical and horizontal extent of archeological resources within the area of interest. Areas vary depending on the purpose of the survey and can be as different as an arbitrarily defined tract of land designated for development, a highway corridor, or a watershed defined by drainage or other physiographic factors.

The survey process involves identification of the presence or absence of evidence of past human activity that is normally embodied in archeological sites, and evaluation of the potential of identified sites to provide further information about human behavior and adaptation in the past. The methods and techniques used in surveys vary with the kinds of data to be collected, the amount of information already known about the sites and the landscape, the information required by the sponsor, and the survey goals. Variables may include the intensity and pattern of observations of the surface and the number and intensity of the subsurface investigations (shovel testing or column samples). The critical decisions as to how much area to look at, how much subsurface information is needed, and how much and what kinds of data to record are dependent upon the needs and knowledge of the researcher, the needs of the sponsor, and the recommendations of the reviewing agency.

If, for instance, the purpose of a survey is to determine the location of all cultural resources in a project area (inasmuch as it is technically possible to provide such an inventory and proposed sampling strategy), methods and techniques employed will be different from those that may be employed in a case where the survey is expected to identify the distribution or intensity of human activity in a given area. Other factors, such as the size and complexity of the archeological sites themselves and the contemporary and geomorphological landscape, affect the selection of methods and techniques to be employed.

Information needs, based on such factors as the amount of information already available about past human activity in the area or in the nearby region or the amount of information about a particular site needed for evaluation of significance, also influences the method and design of the survey. How far beyond a specified project boundary it is possible or necessary to consider available information depends in part on how much is known for the project area itself and the obligations of the archeological permittee to comply with the conditions therein and any associated contract.

Depending on the nature of the project, information may be collected in stages. The intensity of survey and amount of information recorded about affected cultural resources by surface or subsurface observations (i.e., testing) may increase by incremental steps in large or complex projects. A preliminary survey can assess the general nature of sites, their density, physical boundaries, and problems of visibility that affect amounts and kinds of information collected and determinations of significance.

Normally the less that is known about an area, the more potentially significant each site may be. The more information collected about sites at the survey level of investigation, both in terms of distribution and content, the more realistic and reliable will be the recommendations for further work. The greater the intensity of the survey (using whatever appropriate techniques), the more realistic and reliable will be the estimate of the number and distribution of sites, as well as the judgments of significance.

The methods and techniques to be used for a particular survey are judgments which professional archeologists must make when proposing work and should be compatible, where appropriate, with the needs of the sponsor and the recommendations of the reviewing agency. Any SOW for any project needs to meet professional standards as established, and MUST have demonstrated experience working in the Caribbean. If the work is a government project, the reviewing agency/groups is also a party to development of the Scope of work. In any event, the basis for these judgments must be made clear when reporting on research methods in the written report on the survey. Just as it is not possible to collect all potential information about a site during excavation, it is normally not possible to conduct a "100% survey" of an area. Current site discovery techniques and the changing character of the modern landscape mean it is unlikely that

ALL evidence of past human activity will be identified in any given area. STPs generally should be 30-50 cm in diameter and 1 meter deep. Nevertheless, statements about the nature of past human occupation and the significance of sites can be made with less than "100% complete" information. Archeological and historical interpretations depend upon a sample of the past. If this sample is recorded with scientific rigor, significant information will result.

I. Site identification

- A. Sites are identified by: **surface features**, such as mounds, embankments, quarry pits, remains of houses or outbuildings, wells, cellar holes, standing structures; **artifacts or refuse** on the surface or recovered in tests of subsurface soils; **discoloration of the soil** which may indicate midden or subsurface features; **non-native or exotic vegetation, anomalous plant communities** (clusters of native cedar or pine in hardwood forest, for example), and/or **decorative or domestic plants** indicating historic activity; or **combinations** of the above.
- B. When heavy ground cover (e.g., pasture or forest) precludes normal visibility of either artifacts or features, some method (e.g., shovel tests, rakes, leaf blowers, rototiller) must be used to insure that there is a reasonable opportunity for the surface and/or subsurface deposits to be exposed (the interval for this exposure should be 10m). Take care not to destroy the surface patterning of artifacts in the process! The large-scale surface stripping of sites should not be conducted at this level of investigation without first consulting with the government agency representative and government agency official.
- C. Local informants should always be sought out for information on artifacts and features which may have been observed in the past and on historic features, buildings, or individuals known to have used or occupied the area.

II. Site definitions

- A. An **archeological site** is defined by the presence of three or more artifacts (chips, flakes, historic objects, etc.) within 5 meters of each other, or by the presence of obvious man-made features such as mounds, agricultural ditches, wells even when there are no artifacts. To be recorded, a site must also be 50 years old or older.
- B. An **isolated find** is recorded as a site if it is a diagnostic or significant artifact. A **diagnostic** artifact is one which provides temporal or cultural information. UTM locations, preferably taken in the field with an appropriate GPS unit, are the recommended method of recording the location of each archeological site. Multiple recordings appropriate for defining the boundaries of long linear sites, or of

circumscribing large irregular sites. The Datum used (e.g. NAD 27, or NAD83) should be indicated on the form.

III. **Collections:** A Collections Plan for All projects--including identification of an appropriate curation storage facility is required.

- A. ***Human Remains and grave associated objects*** should not be collected during survey projects unless a prior agreement has been established among the archeologist and government reviewing agency, the landowner, and the potential descendant communities. Survey teams should have someone in place with the skill and experience to identify human bone in the field under most circumstances. Human remains found exposed on the surface of the ground should be left in place until consultation among all parties results in an agreement to retrieve the remains or rebury them.

One recommended course would be to take digital pictures of the remains in situ and send them as e-mail attachments to the government agent and the reviewing archeologist consulting the descendent community in order to facilitate a quick disposition of the situation. The government agency shall maintain a file of incidents of site vandalism and grave robbing, and should also be notified when disturbed human remains are encountered.

- B. ***Collection of artifacts from surface and/or subsurface shovel testing of each site is required*** (except tombstones from a cemetery!). This stipulation is contingent on having landowner permission or a government permit. The collection strategy and the kinds and numbers of artifacts collected will depend upon the size of the site, the number and diversity of artifacts, the research goals, and the time frame of the project. Some level of spatial control is recommended for all surface collecting. The methods used must be consistent with project goals and must be described and illustrated in the report. The artifacts should be curated in a government approved curation facility. For shovel testing sampling intervals should not exceed 20m. Holes should be at least 30 cm in diameter and 1 m deep following natural soil strata as much as possible. Soils should be screened through ¼" hardware cloth. Positive shovel tests should be bounded in a cruciform fashion to refine and delimit site boundaries and artifact distribution.
- C. ***Observation and recording of artifacts without collecting is not an acceptable practice.*** Much of the interpretation about a site is dependent upon a study of the artifacts. If no collection is made, no confirmation of identification is possible, and the required illustration and analysis in a report would be much less complete. It is highly likely that the artifacts not collected by an archeologist will be collected by someone else and will not be available for future study. This applies equally to historic and to pre-colonial sites.

D. ***Collections of material from sites known to be less than 50 years old need not be made,*** although the nature of the artifacts observed should be recorded. If an archeologist is not thoroughly familiar with historic artifacts (i.e., cannot tell what is 50 years old or older), collections must be made on all historic sites so that proper identification may be made through consultation with a trained historic archeologist.

E. *Collections from small sites:*

Isolated finds or a few scattered flakes: An isolated artifact may be a clue to subsurface material and/or features; a single piece of ceramic with a maker's mark may help date a historic occupation. The decision as to whether to collect and record such a find must be made by the archeologist in the field and justified in the report.

ESTABLISHING SIGNIFICANCE

To establish that an archeological site may indeed contribute information about history or prehistory, there are four attributes which should be considered: structure, content, integrity, and quality (or resolution).

Site structure refers to the overall vertical and horizontal configuration of the artifact-bearing sediments along with cultural features found within and upon those sediments (such as houses, barns, living surfaces, post mold patterns, pits, hearths, and/or noteworthy concentrations of artifacts). Within the natural strata of a site it may be possible to identify discrete cultural strata which may be defined as sediments deposited by or substantially altered as a consequence of past human activity.

Site content may be defined as the assemblage of natural and cultural materials contained within archeological sediments. Natural materials could include naturally occurring pollen, plant remains, or animal remains reflecting past environmental conditions. Cultural materials such as stone or bone tools and manufacturing debris, pottery, fire-cracked rock, and preserved plant and animal food remains, indicate the kind of human activities that once took place at the site. Natural and cultural materials found in archeological sediments may be analyzed and interpreted to provide inferences concerning past lifeways and environments. It is important to recognize, however, that a variety of natural and cultural processes may affect the preservation of materials, thus altering the structure and content of the site. In extreme cases, such alterations may effectively erase most or all traces of past human activity.

Site integrity refers to the present physical condition of the site, while site quality or resolution refers to how observable or recognizable the condition is using contemporary archeological field methods. Assessment of site condition and quality is based upon careful

analysis of the potential impacts of a host of processes affecting natural and cultural materials as they ceased to be a part of a living human ecosystem and became incorporated into an archeological context.

These attributes, common to all archeological sites, can provide a basis for evaluating significance of a specific archeological site. In making this assessment, the present condition of the site must be such that its content, along with, the context of those materials within the overall structure of the site, will permit interpretations to be made concerning past human activities and cultural processes. The likelihood must exist that any such interpretations will add substantially to the present understanding of one or more of a series of research problems (mentioned elsewhere in the archeological literature and in this State Plan) dealing with past human activities and cultural processes at the local, state, regional, or national level.

In order to be determined not significant, it must be demonstrated through adequate documentation from fieldwork and from historic sites archives that the site cannot provide this information.

An archeological site is considered significant until proven otherwise. If a decision of significance or no significance is required and documentation about the site's attributes, as discussed above, is inadequate, the site must be considered significant so that government regulation will provide protection until the site's eligibility can be determined.

Archeologists required by a Plan of Action to make statements of significance and, therefore, to make judgments concerning a site's significance and non-significance. Adequate documentation means establishing the potential of a site to provide information relative to specific research questions mentioned in this Plan or other questions proposed by the researchers. The amount of testing required to establish this potential depends upon the complexity of the site and the nature of the questions to be asked of the data. For historic archeological sites, documentary research must be conducted to assist in the determination of significance. Evidence of both kinds of research which aided in the evaluation must be provided in the written report.

Redundancy of information may occur in two sites, one of which will be impacted by a government undertaking and the other not impacted. This does not and must not affect the establishment of the significance of either of the sites, if each can contribute to information about the past. It is the information in a site which makes it significant, not whether other sites contain similar information or whether another site may be impacted. How two significant sites with similar information are treated may take into consideration outside

factors such as public welfare, nature of and amount of impact, funds available, and so forth.

Determination of significance of both pre-colonial and historic archeological sites is an issue which is constantly being discussed. The more we do it, the better we should be at doing it-if we detail adequately in our written reports the judgments, knowledge, and experience which go into making the determinations. Research questions, upon which significance should be based, are constantly being developed, refined, added to, even changed. While these Guidelines should serve as guidelines, archeologists should be aware of current literature where these issues are aired.

DETERMINING THE AMOUNT OF IMPACT ON A SIGNIFICANT SITE

Some projects which require a historic and archeological site survey and determinations of significance occur in long, linear areas. Often sites may lie both inside and outside the right-of-way and some portion of the site will be impacted and some will not. It is important that archeologists and agencies understand the scientific and practical requirements of such a situation.

Consideration of significance must take into account the whole site, no matter what portion of it may be within a right-of-way. It is imperative that significance be established on the basis of the nature of the whole site and its potential; decisions of mitigation are then made on the basis of the potential of that portion of the site that will be impacted to add information of importance to research questions.

MITIGATION

Mitigation/data recovery (Phase III) of an adverse effect on an archeological site can be accomplished through one or more of the following actions: avoidance of impact, preservation or protection in place with legal covenants if possible, site burial in some cases, or data recovery. Agreement as to which mitigative action is appropriate is normally accomplished through a Memorandum of Agreement (MOA) or a Programmatic Agreement (PA), which includes a treatment plan.

The mitigation option generally recommended first is avoidance of impact through redesign of the project. While avoidance is a perfectly legitimate tool, it must be understood that avoidance, in and by itself, is NOT a protective measure. That is, avoiding direct impact on an archeological site may result in secondary or indirect impacts (for example, gas stations built at major new highway intersections).

Protection or preservation is an active category of mitigation, something that is done to a site to protect it from any future adverse impact. Protection could involve development of the property for public interpretation, security measures limiting public access, local ordinances providing city or county protection with penalties, and so forth.

Data recovery is another appropriate means of mitigation of adverse effect for archeological properties. Through data recovery, the information contained in the site which gives it its significance is removed prior to project construction and the project, therefore, will not have an adverse effect on the significant site. Its significance is no longer in the ground; it is in the records and collections being curated.

Mitigation through data recovery must begin with the development of a detailed research plan which discusses and justifies the design of the investigation to retrieve from the ground the information needed to answer research questions. The strategy of the fieldwork must be explained in detail, and the proposed analysis and expected results must be discussed.

If an eligible site is known to contain, or may contain, human remains, an **Application for Excavation Authorization** must be submitted to the government and acknowledgment received prior to any excavation of human remains. Completion of the form will require written consent of the landowner, the most likely descendant group, and the government agency representative. Planned disposition of the remains must also be indicated, thereby necessitating consultation with all affected parties before the form is completed. An agreed-upon plan for forensic documentation of the remains, and their curation and/or potential re-interment in place before removal is recommended.

If recovery of human remains is a part of a data recovery program, the procedures must be conducted only after consultation with living descendants. The data which must be observed and recorded in the field, the kinds of documentation and possible analysis required, and the information to be included in the final report should be consistent with the Standards for Data Collection from Human Skeletal Remains promulgated by the Field Museum of Natural History's 1991 Workshop on standards for the collection of osteological data, and published as *Standards for Data Collection from Human Skeletal Remains*;, AAS Research Series No. 44. Reference to the "Standards". Because it is likely that human remains will not be available for additional or future study, the observations made during each data recovery project, both in the field and in the forensic laboratory, must be as complete as current techniques and interpretations allow and consistent with the highest standards of modern forensic studies.

SUMMARY

The sequence of work in consideration of cultural resources to be affected by government projects should be efficient, economical, and justifiable. Briefly, the sequence is normally this:

- Consult with Descendant Communities if appropriate and/or mandated by the Project Scope of Work or Programmatic Agreement.
- Locate and record basic information on all cultural resources that are 50 years old or older in a project area.
- Test archeological sites to see what is below the surface.
- Decide which sites have the greatest potential for providing significant information concerning pre-colonial and historic lifeways and cultural processes. Provide adequate support for these determinations, including use of documentary research for historic archeological sites.
- Turn in completed archeological and historic structure site forms to the government agency representative.
- Arrange for appropriate curation of all artifacts and documents. Turn in a completed Project form to the Government agency representative at the time that the artifacts and documents are put into curation.
- Mitigation in some form is required in all cases for sites in which human remains are expected or encountered, without exception.
- Carry out mitigation measures
- Arrange for appropriate curation of all artifacts and records.
- Publish results.

TECHNICAL ARCHAEOLOGY REPORT WRITING; suggested models

At all levels of archeological work, whether done to satisfy government laws, regulations, or procedures, or for other scientific purposes, critical judgments about the nature and treatment of cultural resources must be made. In order to assure the best possible judgments, the government agency representative is required to review the draft and final reports of archeological work involving Government funds, licenses, permits, or

government assisted undertakings. If the report lacks sufficient information or detail, it may be considered inadequate for compliance purposes.

Authors of technical reports should remember that those who review their work, either as peer reviewers, do not have access to the raw data collected in the field, nor have they had the opportunity to visit the site(s) in person or to conduct a detailed analysis of artifact collections. Therefore, it is incumbent on researchers to include all of the information available about each site in the technical report so that reviewers can make judgments based on data collected in the field, rather than their personal assessment of the skill and integrity of the investigator. This is important regardless of the eligibility of a given property. In fact, it may be more important in the case sites thought to be ineligible, since they are frequently severely damaged or destroyed during project construction and the technical report may contain the only information available on them.

Points of Best Practices:

- In all cases, data on specific site location (either in the text or on maps) must not be a part of any report which is available to the public in any way. Submit this information separately to the sponsor of the project and the reviewers.
- Details of site locations must also not be part of any report published for public or professional audiences after the project is completed.

Separate reports must be prepared if an archeologist is hired by a firm to conduct investigations in two unrelated government undertakings involving different government agencies, even if the projects are in the same vicinity and the archeologist is working under a single Scope of Work, since reports may be subject to freedom of information acts, and some Archeological Firms make their reports widely available after project completion, special consideration needs to be taken that neither the maps and figures nor the text of the report itself divulge specific site location information that would lead to trespass or damage to archeological sites.

ARCHEOLOGICAL SURVEY REPORTS

Archeological surveys done for compliance purposes are required when the government agency representative believes there is a potential for cultural resources, when resources are already known within the area of project impact, or when a particular government agency's regulation require one. Whether cultural resources are found or not during a survey, a formal report containing the items of information outlined below must be written and a draft submitted to the sponsor.

It is as important to record judgments of why no resources were found as to record what resources were found. The area walked and/or shovel tested and the nature of the ground cover must be indicated so that the results of the survey can be evaluated in light of these constraints. In addition, the factors of ground cover and survey techniques can be reviewed when or if future surveys are contemplated in the same area. Surveys vary in intensity and may or may not include testing. It is the reporting in detail on these activities, decisions, and judgments that is important.

For reports on small, short, or negative surveys, there are two important things to remember: (1) letter reports are never considered adequate and will be returned by the government agency representative for further information unless an existing agreement document allows an abbreviated reporting format; (2) if no cultural resources are found, a formal report must still be written.

The assumption is that if a survey is required it is because there is a likelihood that cultural resources will be present. If no resources are found, the report should reflect both why it was thought they would be and why no resources were found (e.g., modern environment, settlement patterns of the distant or recent past).

In preparing information for reports based on this outline, the amount of detail should be commensurate with the size and complexity of the project. The information should always be directly relevant to the project area. If little is known of the culture history of the area, say so, but put the area into context relative to what was being looked for in the way of cultural resources. Since fieldwork will have been accomplished, describe the environment as seen by the people in the field, using appropriate sources for fitting that into an environmental setting.

I. Front matter (in this order)

- A. Title page: title (indicating project and location), author of text, principal investigator if different from author, sponsor, and date of report.
- B. Abstract.
- C. Management Summary (unless the Abstract is adequate, as may be the case for small projects or short reports).
- D. Table of Contents (required if the report is more than 10 pages double spaced).

II. Introduction

1. Describe the project area and its setting (e.g., do buildings exist in the area; has there been clear cutting, etc.). Provide the size of project area; if this is a government undertaking, provide detail on the nature of the government

undertaking itself; name the project sponsor and sponsor of archeological work (if different from project sponsor). Include a project location map.

- B. Summarize the archeological work to be performed.
- C. Note the actual commitment of personnel time in the fieldwork, analysis, and report preparation.
- D. Discuss the constraints upon the field and documentary research (environmental, climatic, temporal, fiscal).

III. *Previous archeological research in the project area*

- 1. Discuss any known fieldwork and/or any written information on the history or prehistory.
 - B. Discuss known sites including those found in documentary sources.

IV. *Summary of project area culture history*

- 1. Describe the past human occupation of the area as known from a search of the literature.

V. *Environmental Setting*

- 1. Describe the present environment of the project area as it affects both the archeologist's ability to perform the archeological work and as it is thought to affect the location, integrity, and visibility of the archeological sites. If pre-colonial sites have been found, a brief discussion of the soils and geomorphology is appropriate,
 - B. Discuss the historic or pre-colonial environment (if possible and/or appropriate) and how it may have differed from the contemporary environment. Discuss how this difference might have affected the settlement of people in the area in both historic and pre-colonial times.

VI. *Present archeological project*

- 1. Describe the goals of the fieldwork and analysis. Lay out the research problems or testable hypotheses that are to be used to help determine the significance of sites. A description and co-ordinate location of the site to be investigated must be given. A detailed presentation should be presented on survey, field, finds and conservation, and environmental and physical anthropological aspects. The Research Design should include equipment and human resource needs, project scheduling and a detailed budget.
 - B. Describe and justify the method used in the field and laboratory.

1. Survey methods used (transect; zigzag; random; other).
 2. Testing methods used (shovel tests-number, spacing, depth; screen size; size; raking; clearing; coring; pits; other).
 3. Collection methods used (all artifacts collected; controlled over a specific area; recovery methods used in testing).
 4. Informant interviews if appropriate.
 5. Include a map of the project area, indicating in detail the locations examined, area NOT surveyed, and methods used in different areas, e.g., pedestrian and collection survey in plowed fields; with shovel tests; shovel tests only in pasture, and so forth.
 6. Laboratory methods used.
 7. Analytical methods used (i.e., statistical procedures, etc.).
- C. Results of fieldwork and analysis
1. If no cultural resources were found, discuss why (previously destroyed, environmental conditions precluded finding, testing methods inadequate to find buried sites, not present, or known only from informant interviews but no evidence found).
 2. If cultural resources were found:
 - a. describe the nature of each site in short narrative form (size, both vertical and horizontal if known; quantity of artifacts, features or potential features; topographic location, site integrity, and the like. Site numbers must be included in the final report). Detailed site maps and descriptions should accompany the report. Include a discussion of location of shovel tests, cores, cleared areas, test pits as appropriate. A map indicating where these are placed should accompany the site records; and be included in the report. Provide as much detail as possible. Do not assume a given level of knowledge on the part of the reader. Discuss not only what is known about the site, but HOW it is known as well.
 - b. enumerate and describe artifacts. Artifacts, especially diagnostics and items with time-sensitive attributes, should be described sufficiently to reveal their significance. Generic terms like 'potsherd' or 'projectile point', may be insufficiently specific for the reviewer and subsequent readers to interpret the findings without having to go back to the original artifacts for more information. Illustrations may be used to help with these descriptions. A summary table or tables of artifact totals by class and provenience should be included. For example, if 10 of 25 shovel tests used to define the boundaries of a site produced artifacts, information showing which tests produced the artifacts and how many were in each test should be provided. Summary tables of artifacts collected from general contexts, such as plowed field surfaces, should also be included.
 - c. describe all features including those above ground and document with photographs. In the case of standing structures, photographs are particularly important.

- d. include illustrations or photographs of diagnostic artifacts.
- e. if human remains are encountered, the scientific information to be reported is found in Appendix A
- f. discuss the information recovered in relation to research problems in the area as presented in this State Plan and any others developed by the researcher.
- g. discuss problems in defining nature of sites, materials, or nature of occupation; that is, what influence have constraints mentioned above had on ability to find or interpret the data.
- h. evaluate the reliability and value of the information recovered.
- i. provide predictions for locations, density, and nature of additional archeological sites and historical information as appropriate, or as required by the sponsor.
- j. indicate where artifacts and records will be curated.

VII. *Statements on significance*

Significance must be stated in relation to potential of the property to contribute information on research questions in the appropriate Study Units or other research questions developed by the researcher.

Methods of arriving at the conclusions for that potential must be provided in sufficient detail for the reader to judge how these conclusions were reached. A statement on potential significance should be made, whether required by the contract or not.

VIII. *Recommendations*

1. Make and justify recommendation with regard to the following:
 1. Resources discovered
 - a. explain fully any recommendation for no further work on any individual site that will be impacted. This must be justified in relation to the criteria for eligibility and in relation to research problems in this State Plan or elsewhere.
 - b. explain fully any recommendations for further archeological investigations in individual sites, referring to the stated research problems. If archeological work performed is a reconnaissance level survey, further work may be necessary to test certain sites for eligibility for significance. This must be fully justified, as must the determination not to test a site further. If this is an intensive survey and/or testing project, further work might be for mitigation of adverse effect on eligible properties and thus must be fully documented and justified.
 2. Additional archeological survey work in portions of the project area not surveyed in present fieldwork.
 - a. fully detail and justify degree of intensity of further survey work. For example, if predictions are for areas of low density of sites, suggest survey method and percent

of area to be looked at.

IX. *References Cited*

A. Use *American Antiquity* format.

X. *Appendices*

- A. Include Scope of Services and responding technical proposal.
- B. Include a short biographical sketch of the Principal Investigator and Project Archeologist (if different from Principal Investigator); summarize both academic training and field experience.
- C. Include detailed artifact tabulations by site and by provenience within the site with accession numbers for each site and catalogue numbers for those illustrated.
- D. Include documentation of a curation agreement.
- E. If this is a large project, individual site descriptions (again without exact locations) might be put in an appendix.

XI. *Attachments*

1. Submit separately from the report a project area map with detailed site locations if these are necessary for sponsor decisions. These are never included in the body of the report but as appendices; they must constitute a separate document and be distributed on a strict need-to-know basis. Each should be prominently marked NOT FOR PUBLIC RELEASE. The Sponsor as well as the archeologist must understand the problem of releasing site location data except for management, compliance, or research purposes.

XII. *Graphic, Illustration Requirement, Binding and Style Guide*

A. Maps

1. Project location maps are taken preferably from USGS quadrangle maps, highway maps, or those provided by the sponsor. These maps must have a north arrow, a scale, a legend and date identifying the project, and name of the person drawing the map.
2. Field methods maps must show clearly what ground area was walked, where tests or cores were made, and relevant field information.
3. Site maps should show topographic features, placement of shovel or core tests, areas of systematic collecting strategies, and so on. EXACT LOCATIONS of sites should not be indicated, e.g., highway numbers or "3 miles to Ola." These maps must include a north arrow, scale, legend, site number, date, and recorder.
4. Detailed site location maps for sponsor submitted as attachments to the report should include the site locations with site numbers plotted directly on the project maps (either on copies of USGS maps or maps supplied by the sponsor) and should be prominently marked NOT FOR PUBLIC RELEASE.

B. Illustrations

Typical and diagnostic artifacts: Either line drawings or photographs (either original prints or halftones - photocopied photos are unacceptable) are required, particularly if temporal and cultural interpretations have been made based on the identification of the artifacts as a particular cultural/temporal type. This will aid the reviewer in following the interpretations of the author.

Other photographs are appropriate if they supplement the text in such a way as to aid the reader. For example, if environmental constraints hampered the investigations, a photograph of conditions would be helpful. Documentation of impacts to sites would also be useful.

C. Binding

Reports should be bound in some fashion when submitted to the government agency representative for review. Reports fastened with paper clips or held together with rubber bands are not acceptable.

TESTING REPORTS

By and large, the detail needed for reports on testing of sites is the same as that outlined for survey reports. The important thing to remember is that any reader, but most particularly the government agency representative and the sponsor, must be able to understand the basis upon which decisions and recommendations are made.

I. **Front matter** (as in survey reports)

II. **Introduction**

1. Describe the project area and its setting (e.g., do buildings or structures exist in the area). Provide a description of the project, giving specific details on the nature of the project; name project sponsor and sponsor of archeological work if different from project sponsor. Include a project location map.
 - B. Summarize archeological work performed
 - C. Note the actual commitment of personnel and time to the different aspects of the fieldwork, laboratory analysis, and report preparation.
 - D. Discuss the constraints upon the field and documentary research.

III. **Previous research on sites to be tested**

1. Briefly discuss the survey work which located each site and the basis for the decisions to test.

B. Discuss any other research done in the area that would affect the archeologist's ability to establish the significance of the sites to be tested.

IV. *Summary of culture history*

A. Describe the past human occupation of the project area in sufficient detail that those aspects which relate to the sites to be tested are known to the reader. The nature of the gaps in knowledge that may be filled by information in the sites can be suggested.

V. *Environmental Setting*

A. Describe the present environment of each site to be tested and its relationship to the general topography and physiographic environmental setting

B. Discuss the historic and pre-colonial environment in enough detail that additional information which may be in the sites to be tested can be related to present knowledge.

VI. *Present archeological project*

A. Describe the goals of the fieldwork and analysis. This section should indicate the research questions or context within which significance can be evaluated.

B. Describe and justify all methods used in the field and laboratory. Include a topographic map of each site indicating location and nature of tests, and specific identification (by number, letters, or some other identifier) of each test unit. Scaled profile drawings of at least one wall of each test pit and trench must be included, with nature of soil matrix and cultural content indicated.

C. Results of the fieldwork and analysis:

1. Summarize the nature of each site tested: stratigraphy, features, artifact content and contexts, unusual associations, degree of preservation of perishable material, and so forth.

2. If human remains are encountered, the information which must be recorded in the field and reported in the text is in Appendix C of this Plan (added at the end of these guidelines).

3. Artifacts from each site should be described and discussed by class (stone, ceramics, etc.) and morphology and/or function. Totals should be presented by class/morphology, by provenience, and by site in tabular form.

4. Illustrate diagnostic artifacts.

VII. *Discuss conclusions as to the significance of each site tested*

1. Determination of significance must be related to potential information in the site, to research questions. If tested sites are not considered significant, justify this conclusion in relation to the same research potential.

VIII. *Recommendations*

1. If a tested site is not considered significant, explain in detail why no further archeological work is recommended. If a tested site is considered significant, recommendations for

appropriate mitigation are normally required by the sponsor. The amount of detail in those recommendations is usually specified in the contract, i.e., it may be that the archeologist is asked only to recommend avoidance, preservation, or data recovery, with no further detail required, or it may be that all the specifics for the recommended mitigation are required, including a suggested budget. Justification for recommended actions must be clear. For information on recommendations relative to treatment of human remains, consult with the government agency representative.

IX. **References Cited** (as in survey reports)

X. **Appendixes** (as in survey reports)

XI. **Graphics** (as in survey reports)

REPORTS OF CONSTRUCTION MONITORING

Occasionally, the monitoring of a construction project is the only means available to protect an eligible archeological site. This may be because construction will occur dangerously near the site, or affect a portion of the site thought to be already disturbed, or for budgetary reasons. Such monitoring should always be conducted by an archeologist who meets qualifications Standards who has clear authority to halt the construction, if necessary. Persons who do not meet the qualifications standards may assist, but should NEVER be left to oversee the monitoring on their own.

If intact archeological deposits are encountered, construction work should stop long enough to recover and document the deposits. Construction may continue in other areas, as long as an -qualified archeologist is available to conduct monitoring. When human remains are encountered, construction should be halted immediately and the discovery area secured. Again, work may continue in other areas, provided that such work is monitored by an -qualified archeologist. This applies, even if the remains are badly disturbed and in fragmentary form. Local law enforcement and the government agency representative should be contacted immediately, and consultation should be initiated with interested potential descendant groups.

I. **Front matter** (as in survey reports)

II. **Introduction**

A. Describe the project area and its setting. Provide a description of the project, giving specific details on the nature of the project, project sponsor, or other sponsor of archeological work if different from project sponsor. Describe the events that led to the decision to conduct monitoring. Include the Scope of Work and relevant correspondence as an appendix to the report.

- B. Include a project location map
- C. Note the actual commitment of personnel and time to the different aspects of fieldwork, laboratory analysis, and report preparation. Provide the dates on which monitoring activity occurred. Provide a biographical summary of participating personnel as an appendix to the report.
- D. Discuss constraints encountered in the field and how they affected the work.

III. *Previous research on sites to be monitored*

- A. Discuss any previous research done at the site(s) in question.

IV. *Summary of culture history*

- A. Describe how the archeological remains at the site fit into the past human occupation of the project area.

V. *Environmental setting*

- A. Describe the present environment of the site.
- B. Discuss the historic and pre-colonial environment in as much detail as is appropriate, particularly as it relates to project goals.

VI. *Present archeological project*

- A. Discuss the goals of the monitoring.
- B. Describe and justify the methods used and any analyses conducted.
 - 1. Special methods used to either protect or recover cultural deposits (e.g., mechanical equipment, water screening and/or flotation in the field or lab, etc.).
 - 2. Describe special samples collected for analysis.
- C. Results of fieldwork and analysis
 - 1. Describe the progress of the monitoring and any actions necessary to protect or retrieve cultural remains. Photographic documentation is of particular importance, but should not depict human remains, unless approved by the descendant population.
 - 2. Describe any artifacts or features (function, relationships, etc.), if any, and discuss their analysis. Provide illustrations and photographs of any features discovered.
 - 3. If human remains were encountered, discuss any actions taken to secure the location and initiate consultation.
 - 4. Discuss any special analyses (computer manipulation, osteological, floral, faunal, historic, etc.)
 - 5. Any artifacts recovered should be described and discussed by class, morphology, and function. Totals should be presented by class/morphology, by provenience, and by site in tabular form.

6. Illustrate diagnostic artifacts.
7. Profile or plan view drawings made in the field should be presented and accompanied by photographs.

VII. Summary and Conclusions

- A. Summarize archeological knowledge gained (or lost) as a result of the monitoring activity and how it might be used to address current research goals.
- B. Address whether the monitoring produced new evidence about the site(s) that might change previous findings of eligibility.
- C. Address whether the monitoring was successful and render an effect judgment (i.e., no effect, no adverse effect, or adverse effect).