Dear Ambassador,

As prescribed by the revised Operational Guidelines for the Implementation of the World Heritage Convention and its Annex 6, the Advisory Bodies have been requested to submit a short interim report for each nomination by 31 January 2021. We are therefore pleased to provide you with the relevant information outlining issues related to the evaluation process.

The ICOMOS technical evaluation mission to “Dholavira: a Harappan City” was carried out by Mr. Kai Weise (Nepal) in December 2020. The mission expert highly appreciated the availabilities and support provided by the experts in your country for the organization and implementation of the mission.

On 24 September 2020, a letter was sent by ICOMOS to request further information regarding the justification for inscription and comparative analysis, conservation, boundaries and management. Please convey our thanks to all the officials and experts for the additional information you provided on 11 November 2020 and for their continued cooperation in this process.

In mid-January 2021, the ICOMOS World Heritage Panel held an extraordinary session, as per request of the World Heritage Committee, that evaluated the cultural and mixed properties nominated for inscription on the World Heritage List in 2021, for which technical evaluation missions were organised in December 2020. The additional information provided by the State Party, together with mission and desk review reports were carefully examined by the Panel members. This process will conclude in March 2021.

We thank you for the availability of your Delegation to the meeting held on 13 January 2021 with some representatives of the ICOMOS Panel. The exchanges during this meeting were of great help for the third part of the ICOMOS Panel meeting. During its last part meeting, the Panel has identified areas where it considers that further information is needed.

Therefore, we would be pleased if the State Party could consider the following points:

Boundaries of the nominated area
In the ICOMOS’ first letter to the State Party requesting additional information, question on the rationale for the boundary delineation was asked. In the response provided by the State Party, it was indicated that “The delineation of the site boundary has been kept in order to encompass and preserve all the attributes of the nominated property (i.e., the excavated remains) as parts of the site are scattered at different locations within the property boundary.” (p. 12). ICOMOS would be pleased if the State Party could confirm whether the boundaries have been established based on an archaeological survey of a much larger area than is proposed.
for the nominated property area, and if this was the case, provide details of the extent and scope of this wider archaeological survey – such as a map showing the extent of it.

**Buffer zone**
ICOMOS notes that the State Party is in the process of extending the buffer zone to include all the west strip of the Khadir Island in order to include the ancient quarry sites, as well as the potential port site. ICOMOS welcomes this initiative. It would like to receive detailed information on the rationale for the delineation of these extended boundaries, apart from protecting the quarry and potential port sites and information; on the exact extent of the revised delineation of the buffer zone, including maps; and on the legal basis of its demarcation and of the protection measures in place to allow the buffer zone to provide support to the property.

Could the State Party also clarify whether this new delineation has been officially approved, and if not, what will be the timeframe for its legal approval?

In terms of management, how will this expanded buffer zone be managed, and what will be the role of Archaeological Survey of India in this management? Since the extended buffer zone overlaps with the “Kachchh Desert Wildlife Sanctuary” declared by the Gujarat Government based on the Wildlife Protection Act, 1972, what is the coordination mechanism in place to resolve any potential conflict of interests that might arise, and which designation will take precedence?

**Legal protection of the quarry sites**
ICOMOS would be pleased if the State Party could confirm the level of legal protection of the quarry sites, and provide with detailed information, including decision documents, relevant maps, a description on what legal provision is associated with this listing, and when protective measures will be implemented.

**Management of the nominated property**
It would be helpful if the State Party could further clarify the role of the Regional Apex and Local Level Committees in the management system of the nominated property.

**Tourism**
ICOMOS notes that site visitation is currently relatively low, however the nominated property is being prepared for receiving larger numbers of visitors. ICOMOS understands that the tourism management plan is being implemented. It would be useful if the State Party could provide further details on the following aspects of this plan:

- When will the pathways for regulating visitors’ movement on site be completed?
- Will some parts of the site, such as staircases of the entrances to the Castle and Bailey be protected by additional structures? And, if so, how?
- What measures will be put in place to keep visitors staying on the pathways?
- Will guided tours be mandatory for visitors, so that the safety of the site can be better secured?
- Will local people be trained as tourist guides so that they can benefit from the tourism industry and also contribute to the protection of the site?
- When will the carrying capacity be established for the site as a whole and for each sensitive part of the site, and what measures will be implemented to keep the visitor number under the carrying capacity?
- What measures will the State Party adopt to evenly distribute visitation throughout the year?

**Heritage Impact Assessment**
According to the Site Management Plan, major infrastructure, interpretation and tourism facilities, as well as a museum are planned to be constructed within the nominated area and buffer zone. ICOMOS would welcome further information on how such projects will be developed and assessed in relation to their potential impact on the property and its immediate setting. Could the State Party confirm whether Heritage Impact Assessments have been undertaken on these initiatives at an early stage in the planning process? ICOMOS
would be pleased if the State Party could also confirm whether the Heritage Impact Assessment mechanism has been incorporated as part of the management system of the nominated property and provide details on the timeframe of such adoption, and associated documents.

**Future research**

ICOMOS welcomes the continuing research undertaken by the State Party. ICOMOS notes that in the nomination dossier and additional information provided by the State Party, the basis of the justification for Outstanding Universal Value is confined primarily to the excavated area, that is the city and the cemetery to the west of the city. While confirming this justification, ICOMOS considers that being occupied for 1500 years as a major city in the southern part of the Harappan Civilization, the wider setting of the nominated property may have strong potential for further archaeological remains. In addition, the preconceived city planning of the nominated property is impressive, and could be part of future research to position it within the context of urban formation process of mankind. Could the State Party clarify whether a research strategy is established for the nominated property, and if so, provide information on this strategy.

We look forward to your responses to these points, which will be of great help in our evaluation process.

We would be grateful if you could provide ICOMOS and the World Heritage Centre with the above information by 28 February 2021 at the latest, the deadline set out in paragraph 148 of the Operational Guidelines for supplementary information on nominations to be received. Please note that any information submitted after this date will not be considered by ICOMOS in its evaluation for the World Heritage Committee. It should be noted, however, that while ICOMOS will carefully consider any supplementary information submitted, it cannot properly evaluate a completely revised nomination or large amounts of new information submitted at the last minute. So we would be grateful if the State Party could keep its response concise and respond only to the above requests.

We thank you for your support of the World Heritage Convention and the evaluation process.

Yours faithfully,

Gwenaëlle Bourdin
Director
ICOMOS Evaluation Unit

Copy to
Archaeological Survey of India
UNESCO World Heritage Centre