



# UNESCO Guidance for the World Heritage 'No-Go' Commitment

---

Global standards for  
corporate sustainability

Published in 2022 by the United Nations Educational, Scientific and Cultural Organization, 7, place de Fontenoy, 75352 Paris 07 SP, France

© UNESCO 2022

CLT/WHC/NHU/2022/BRO/11

<https://doi.org/10.58337/NMCZ6168>



This publication is available in Open Access under the Attribution-ShareAlike 3.0 IGO [CC-BY-SA 3.0 IGO] license (<http://creativecommons.org/licenses/by-sa/3.0/igo/>). By using the content of this publication, the users accept to be bound by the terms of use of the UNESCO Open Access Repository (<http://www.unesco.org/open-access/terms-use-ccbysa-en>).

The designations employed and the presentation of material throughout this publication do not imply the expression of any opinion whatsoever on the part of UNESCO concerning the legal status of any country, territory, city or area or of its authorities, or concerning the delimitation of its frontiers or boundaries.

The ideas and opinions expressed in this publication are those of the authors; they are not necessarily those of UNESCO and do not commit the Organization.

Images marked with an asterisk (\*) do not fall under the CC-BY-SA licence and may not be used or reproduced without the prior permission of the copyright holders.

The UNESCO World Heritage Centre thanks the Government of Flanders (Belgium) for their ongoing support in strengthening private sector engagement for the protection of World Heritage sites.

For more information, visit <https://whc.unesco.org/en/no-go-commitment>

Cover photo: LightField Studios/Shutterstock.com\*

Graphic design: UNESCO

Printed by UNESCO





**UNESCO World Heritage properties are cultural, natural and mixed sites of outstanding universal value (OUV) that exemplify some of humanity's most exceptional heritage and treasures on our planet. They cover over a thousand properties in all regions of the world and it is the duty of the international community as a whole to cooperate on their protection. UNESCO World Heritage sites provide major benefits to our society and help safeguard ecosystem services and cultural resources vital for human well-being.**

**Yet the threats to UNESCO World Heritage sites have been rising steadily for decades, including those arising from harmful industrial and infrastructure projects, extractive activities such as mining, oil and gas and large hydropower projects, among others. In view of these significant threats, several leading companies and financial institutions have committed to protect World Heritage by respecting them as 'no-go' areas.**

**UNESCO World Heritage sites are protected under international law as humanity's legacy to future generations and, as such, merit particular attention in corporate policies and business conduct. However, there is wide variation in the nature and strength of sustainability policies and due diligence processes. This guidance was developed to assist companies to develop comprehensive strategies for World Heritage as part of their efforts to measure and manage environmental, social and governance risks.**



‘We firmly believe that these cultural and natural sites of outstanding universal value should be off limits to industrial activity of any form. For that reason, we encourage all companies in the wider mining industry and other sectors to embrace a no-go commitment, and we urge governments to enshrine the no-go principle for World Heritage sites into national laws.’

International Council for Mining and Metals (ICMM)



© Juan Pablo Moreiras / Fauna & Flora International\*

## The World Heritage Convention: Protecting the planet’s most precious places

Many cultural UNESCO World Heritage sites are iconic monuments or landmarks in human history, and natural World Heritage sites are among the most significant biodiversity hotspots on the planet, or play a key role in climate regulation. Millions of people are directly dependent on these sites, as they are important assets for economic and regional development – for example, by creating jobs and providing income from tourism and recreation. Many sites also hold other significance and are the bases for identity and collective memory, and may have great spiritual or other value to communities, locally or further afield.

The sites<sup>1</sup> inscribed on UNESCO’s World Heritage List are protected under the Convention concerning the Protection of World Cultural and Natural Heritage, known as the World Heritage Convention, adopted in 1972. The Convention is an intergovernmental treaty ratified by 194 States Parties pledging to recognize and protect World Heritage, and heritage more generally, within their territories. Article 6 of the Convention stipulates that each State Party to this Convention should not take ‘any deliberate measures which might damage directly or indirectly the cultural and natural heritage situated on the territory of other States Parties to this Convention’.

The World Heritage Convention supports international cooperation and intergovernmental decision-making for the governance of cultural and natural heritage through its governing bodies, the General Assembly of States Parties and the World Heritage Committee,<sup>2</sup> which adopt strategic resolutions and decisions for the implementation of the World Heritage Convention.

The implementation of the Convention at the national level is the responsibility of the States Parties, who set up legal protection for World Heritage and manage the sites. They are supported by many stakeholders, notably UNESCO and its World Heritage Centre serving as the Secretariat to the Convention, the Advisory Bodies to the World Heritage Committee (IUCN, ICOMOS and ICCROM), civil society, local communities and indigenous peoples, and the private sector.

UNESCO’s mission for World Heritage is, *inter alia*, to help States Parties safeguard heritage through technical and financial assistance and encourage international cooperation in the conservation of World Heritage by leading public awareness-building activities and setting global standards in heritage protection. This guidance document,

- 1 As of June 2022, a total of 1,154 World Heritage sites (897 cultural, 218 natural and 39 mixed properties) are included on UNESCO’s World Heritage List across 167 countries. The list of all World Heritage sites is available at: <https://whc.unesco.org/en/list/>.
- 2 The World Heritage Committee consists of representatives from 21 of the States Parties to the Convention elected by the General Assembly.

developed by UNESCO in close cooperation with the Advisory Bodies and in consultation with the corporate sector, is part of this effort and aims at engaging companies as active partners in the conservation of the planet's most precious places.

## The key role of the corporate sector in protecting World Heritage

Society now expects more sustainable conduct from businesses, in order to address accelerating environmental degradation and global inequalities. This is particularly evident in UNESCO World Heritage sites, which often have a high international profile and enjoy political support and popular appeal. Any corporate sector<sup>3</sup> operations negatively impacting World Heritage now run a considerable risk of affecting their financial return through possible reputational damage, litigation, compensation claims, shareholder divestment and reduced access to financing. All of this has led to a better integration of internationally designated areas, including for World Heritage, in company policies and due diligence processes as part of a broader effort by the corporate sector to measure and manage environmental, social and governance risks.

The corporate sector has a significant role to play in safeguarding World Heritage, through avoiding activities that might have negative impacts on sites, promoting sustainable alternatives, developing and supporting actions that make a positive contribution to heritage management and protection, and helping achieve the Sustainable Development Goals as an integral part of their operations.

## The World Heritage 'no-go' commitment

A growing number of companies from the extractive, finance, insurance and hydropower industries, as well as industry associations, have made commitments to protect World Heritage sites. They have often demonstrated this by refraining from undertaking or funding harmful industrial or other large-scale development projects within World Heritage sites, their buffer zones or broader setting which could negatively impact the sites and their OUV. These policies are generally referred to as the World Heritage 'no-go' commitment.

The first World Heritage 'no-go' commitments date back to the early 2000s. In 2003, following several years of in-depth discussions, the International Council on Mining and Metals (ICMM) made a pioneering statement to no longer pursue mining projects in World Heritage sites, and that any activities in the vicinity of these sites would be rigorously evaluated to avoid impacts on their OUV. That same year, Shell became the first private sector company in the oil industry to make a similar commitment.

Since then, the World Heritage Committee has urged all States Parties to the Convention and leading industry stakeholders to respect the 'no-go' commitment by not permitting extractive activities within World Heritage sites and to ensure that activities outside of the property boundaries cause no damage to sites and their values.<sup>4</sup>

In 2018, the World Heritage Committee, in its Decision 42 COM 7,<sup>5</sup> welcomed the growing interest of the finance and insurance sectors in subscribing to the 'no-go' commitment. The Committee strongly encouraged all banks, investment funds, the insurance industry and other relevant private and public sector companies to adopt as part of their sustainability policies provisions to ensure that they are not financing projects with a negative impact on World Heritage sites, and that companies they provide financial services to subscribe to the 'no-go' commitment.

As of October 2022, more than 50 World Heritage-related commitments have been made by companies and industry associations. UNESCO maintains a database of these policies and commitments on its website,<sup>6</sup> which features companies from the extractive, finance and insurance industries, including signatories to the Equator Principles and the UN Principles for Sustainable Insurance. From other sectors, the International Hydropower Association, building materials company CEMEX, the World Rowing Federation and the Responsible Jewellery Council are among those who have pledged to protect World Heritage.

Many of the corporate sector safeguard policies also refer to other internationally designated areas, including Ramsar sites and UNESCO-designated Biosphere Reserves.

<sup>3</sup> Corporate sector covers the financial and non-financial companies, both public and privately owned.

<sup>4</sup> Decision CONF 209 X.C.48-61 (<https://whc.unesco.org/en/decisions/2692/>); Decision CONF 204 VIII.44-49 (<https://whc.unesco.org/en/decisions/2414/>); Decision 37 COM 7 (<https://whc.unesco.org/en/decisions/5018/>); Decision 40 COM 7 (<https://whc.unesco.org/en/decisions/6817/>)

<sup>5</sup> Decision 42 COM 7 (<https://whc.unesco.org/en/decisions/7112/>)

<sup>6</sup> <https://whc.unesco.org/en/no-go-commitment/>

# Guidance for the World Heritage 'no-go' commitment



sljones/Shutterstock.com\*

## To meet global sustainability standards companies are strongly recommended to develop comprehensive strategies for safeguarding World Heritage.

One impediment to a stronger engagement with the corporate sector has been the lack of specific 'no-go' wording for World Heritage. The variability of existing policies is a concern, as some essentially condone harm to protected areas. Some banks have also expressed uncertainty about what constitutes a robust and comprehensive World Heritage policy. Therefore, developing standardized, industry-wide guidance for the 'no-go' commitment to protect all UNESCO World Heritage sites (existing and future), to ultimately enable their wide-scale approval, adoption and implementation, is paramount.

The following seven-part guidance is set out to provide direction for companies and financial institutions when developing, incorporating or improving their World Heritage 'no-go' commitments. These include policies which primarily avoid negative impacts, but additionally support only those activities that contribute positively to management and conservation of World Heritage sites.

The guidance is based on the Equator Principles, the UN Global Compact,<sup>7</sup> Principles for Sustainable Insurance (UNPSI), Principles for Responsible Investment (UNPRI),<sup>8</sup> the International Finance Corporation (IFC) Performance Standards,<sup>9</sup> the OECD Guidelines for Multinational Enterprises<sup>10</sup> and civil society input such as the WWF report *How Banks can Safeguard our World Heritage*,<sup>11</sup> as well as advice from the technical Advisory Bodies to the World Heritage Committee – the International Union for Conservation of Nature (IUCN), International Centre for the Study of the Preservation of Cultural Property (ICCROM) and the International Council on Monuments and Sites (ICOMOS).

The guidance is divided into two parts. Part 1 concerns establishing (or pledging) the 'no-go' commitment (guidance 1–4) and Part 2 addresses the implementation of the commitment itself (guidance 5–7).

It should also be noted that, regardless of the policies that companies may adopt, in the World Heritage context, it is the States Parties' responsibility to inform the Committee through the Secretariat (the UNESCO World Heritage Centre), of their intention to undertake or to authorize activities which may affect the OUV of World Heritage sites. Notice should be given as soon as possible (for instance, before drafting basic documents for specific projects) and before making any decisions that would be difficult to reverse.<sup>12</sup>



'As a current member of the World Heritage Committee, the Government of Flanders (Belgium) strongly believes the private sector has a crucial role to play in the World Heritage conservation. We are therefore happy to support the development of this UNESCO Guidance and encourage more companies to adopt a World Heritage no-go policy.'

**Jan Jambon,**  
Minister-President of the  
Government of Flanders (Belgium)

7 <https://www.unglobalcompact.org/what-is-gc/mission/principles>

8 <https://www.unpri.org/about-us/what-are-the-principles-for-responsible-investment>

9 [https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/policies-standards/performance-standards](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/performance-standards)

10 <https://www.oecd.org/daf/inv/mne/48004323.pdf>

11 <https://www.worldwildlife.org/publications/how-banks-can-safeguard-our-world-heritage>

12 The Operational Guidelines for the Implementation of the World Heritage Convention, <https://whc.unesco.org/en/guidelines/>

**Part 1:**

# **Establishing the World Heritage 'no-go' commitment**



StanislavBeloglazov/Shutterstock.com\*

# GUIDANCE 1

## Clear commitment

### 1a. Precision in statement of intent

Clearly state an unequivocal intention to abstain from investing in or implementing projects inside and outside all designated UNESCO World Heritage sites (current and future) that could negatively impact their OUV<sup>13</sup>: the values, integrity, authenticity and their protection and management. This statement could be contained in a policy that defines clear prohibitions and avoids ambiguous wording.

### 1b. Activities incompatible with UNESCO World Heritage status and OUV

The World Heritage Committee has made clear statements on certain activities, which are considered incompatible with World Heritage status, including oil and gas exploration and exploitation, mining and dams with large reservoirs.

However, many more activities could be considered incompatible with World Heritage status should they have adverse impact on sites and their OUV. Examples include, but are not limited to, activities that lead to the extraction of natural resources, degradation of ecosystems

or landscapes, or that require large-scale infrastructure (e.g. for transportation, energy production or tourism). Incompatibility will be determined through appropriate impact assessments, and only activities that can demonstrate that they avoid adverse impact on the OUV and positively contribute to the protection of World Heritage sites will be considered.

### 1c. Inclusion of all potential negative impact and OUV

The commitment should include avoidance of all potential damage to the OUV of UNESCO World Heritage sites, regardless of where the project is located or the activities occur – within the property boundaries, their buffer zones<sup>14</sup> or their wider setting. Projects at a distance from a World Heritage site may also adversely impact the OUV and these must be considered. Examples are hydropower installations upstream or downstream of World Heritage sites but situated in the same river basin, and infrastructure installations that are visible from the site.



‘For the last 19 years, members of ICMM have voluntarily committed to not mine or prospect in World Heritage sites. Together accounting for around one-third of the global mining industry, our members are committed to supplying the metals and minerals necessary for the energy transition in a responsible and sustainable manner.’

International Council for Mining and Metals (ICMM)

13 Outstanding Universal Value (OUV) – ‘cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity’. To be deemed of OUV, a site must meet at least one out of ten criteria and meet the conditions for authenticity, integrity, protection and management. Each site inscribed on the World Heritage List will have a statement of OUV for which it is included on the World Heritage List and which must be protected from adverse impacts of developments.

14 A buffer zone is a formally established area surrounding the World Heritage site which has complementary legal and/or customary restrictions placed on its use and development to give an added layer of protection. <https://whc.unesco.org/en/guidelines/>



'IFC recognizes the outstanding value of UNESCO World Heritage sites. We are proud to be the first development institution to have introduced guidance on not financing harmful activities in UNESCO natural and mixed World Heritage sites as well as in Alliance for Zero Extinction sites, which helped launch a trend amongst the Equator Principles Financial Institutions and other banks and companies that followed suit. Nature, and particularly protecting and conserving biodiversity, continues to be at the heart of our endeavors, driving better and more sustainable solutions to development.'<sup>15</sup>

International Finance Corporation (IFC)

## **GUIDANCE 2**

### **Accountability and transparency**

---

Create a binding commitment for the company that will be audited both internally and externally. A binding commitment is more effective in supporting the protection of World Heritage than a voluntary commitment, as it provides a clear premise for accountability and implementation of the policy.

Develop processes to regularly assess, measure, monitor and update the company's commitment. The results of assessments should be in written form, to ensure they can be properly audited. As there is no real accountability without transparency, these results should be disclosed and reported publicly.

## **GUIDANCE 3**

### **Engage in regular dialogue with the UNESCO World Heritage Centre and Advisory Bodies**

---

Discuss the development and implementation of the company's policy, as well as planned activities in or near designated UNESCO World Heritage sites, with expert international organizations (i.e. the UNESCO World Heritage Centre, and the Advisory Bodies ICCROM, ICOMOS and/or IUCN). The most effective 'no-go' commitments arise from a close collaboration and information exchange among

the State Party, the company, UNESCO and other relevant stakeholders.

Maintain ongoing dialogue with industry associations and the scientific community to better understand and manage the global issues related to the commitment.

---

<sup>15</sup> The quote comes from the International Finance Corporation (IFC) and is to be used for the sole purpose of the UNESCO 'no-go' commitment. This quote should not be re-used, modified, reproduced or in any way exploited without prior authorization from IFC.



'Sustainable hydropower is vital to addressing global climate goals and enabling the clean energy transition. But it must be done in the right way. So today, one year after the original commitment, we are now re-issuing our call for hydropower companies around the world and to IHA members to adopt the no-go commitment in World Heritage sites.'

International Hydropower Association (IHA)

## **GUIDANCE 4** Public disclosure

Make the commitment public once it has been approved by the company. Companies are invited to inform UNESCO and the World Heritage Committee by sending a letter and relevant supporting documents to the UNESCO World Heritage Centre ([wh-info@unesco.org](mailto:wh-info@unesco.org)), signed by the organization's Chief Executive Officer, Chair of the Board or

equivalent. The commitment will be reviewed by UNESCO for compliance with the spirit of the World Heritage Convention and this guidance.<sup>16</sup> The name of the company and relevant weblinks to their policies will be published on UNESCO's database of corporate sector World Heritage commitments.

<sup>16</sup> The information included in the corporate policies and commitments and the opinions expressed are not necessarily those of UNESCO and do not commit the Organization. The companies and other relevant entities are responsible for the implementation of their related commitments and can seek advice from UNESCO in developing and implementing their commitments in line with Guidance 3.

## Part 2:

# Implementation of the World Heritage 'no-go' commitment



Geebaek/Shutterstock.com\*

## GUIDANCE 5

### Undertake impact assessments in line with international best practice

---

Where proposed activities may impact the OUV of a UNESCO World Heritage site, appropriate impact assessment - such as environmental impact assessment (EIA), environmental and social impact assessment (ESIA), heritage impact assessment (HIA) or strategic environmental assessment (SEA) - should be undertaken in line with international best practice standards and the *Operational Guidelines for the Implementation of the World Heritage Convention*.<sup>17</sup> The impact on OUV may occur whether the proposed project or activity is inside the property boundaries, within its buffer zones or in its wider setting.

The impact assessment should be in line with the *Guidance and Toolkit on Impact Assessments in a World Heritage Context*<sup>18</sup> - to ensure that direct, indirect and cumulative impacts on OUV have been properly reviewed and considered in consultation with relevant stakeholders and rights-holders, to inform decision-making. The loss or damage to OUV cannot be compensated for, as OUV is irreplaceable, and thus all damage must be avoided. The concept of 'offset' therefore is not applicable in the context of World Heritage.

## GUIDANCE 6

### Spatial assessment of risk

---

Include a robust spatial risk assessment when screening for potential negative impacts of development projects in or near UNESCO World Heritage sites. It should be required prior to the approval of any project and should provide detailed spatial information on the location of potential project areas in relation to the location of World Heritage sites. Where possible and relevant, spatial risk assessments should include the use of authoritative spatial assessment

tools and methods for measuring the biodiversity, cultural and/or other heritage values potentially affected by the tentative project areas. For example, the Integrated Biodiversity Assessment Tool (IBAT) provides subscribers with authoritative geographic information on the location of areas of importance for biodiversity (including natural World Heritage sites) relative to a tentative project area. The disclosure of industry data is strongly encouraged.

## GUIDANCE 7

### Awareness raising

---

Carry out activities, including capacity development and awareness raising, to inform and guide the company's staff, subcontractors, clients and suppliers about the World Heritage commitment. Promote the benefits of having a policy that safeguards World Heritage. Influence other businesses and joint venture partners to adopt similar

commitments. The provision of information, guidance, tools and skills will lead to a better implementation of the commitment by the company and its stakeholders. Operationalize and incorporate the World Heritage 'no-go' commitment into all relevant policies and procedures of the company.

---

<sup>17</sup> <https://whc.unesco.org/en/guidelines/>

<sup>18</sup> UNESCO, 2022, *Guidance and Toolkit for Impact Assessments in a World Heritage Context*. <https://whc.unesco.org/en/guidance-toolkit-impact-assessments/>



CL4USTROPHOBIA/Shutterstock.com\*

# List of entities with strategies for safeguarding World Heritage

## Extractive industry

- bp
- ENGIE
- Eni
- Equinor
- International Council on Mining and Metals (ICMM) – 26 company members including:
  - African Rainbow Minerals
  - Alcoa
  - Anglo American
  - AngloGold Ashanti
  - Antofagasta Minerals
  - Barrick
  - BHP
  - Boliden
  - Codelco
  - Freeport-McMoRan
  - Glencore
  - Gold Fields
  - Hydro
  - JX Nippon Mining & Metals
  - Minera San Cristóbal
  - Minsur
  - MMG
  - Newcrest
  - Newmont
  - Orano
  - Polyus
  - Rio Tinto
  - Sibanye-Stillwater
  - South32
  - Sumitomo Metal Mining
  - Teck
  - Vale
- Shell
- SOCO (Pharos)
- TotalEnergies
- Tullow

## Financial institutions

- ABN AMRO
- Bancolombia
- Barclays
- BBVA
- BNP Paribas
- Church of England National Investing Bodies
- Citi
- Commonwealth Bank of Australia
- Crédit Agricole
- Crédit Suisse
- Deutsche Bank

- Goldman Sachs
- HSBC
- ING
- JPMorgan Chase
- Morgan Stanley
- Royal Bank of Canada
- Royal Bank of Scotland (NatWest Group)
- Société Générale
- Standard Chartered
- TD
- UBS

## Insurance sector

Signatories to the UN Principles for Sustainable Insurance – more than 130 company members, including:

- Allianz
- AGROASEMEX
- AIA Group Limited
- AXA
- Caixa Seguradora
- Certified Sustainable Insurance Partners
- Earth Security Group
- East Africa Reinsurance Company
- ICEA LION General Insurance
- ICLEI – Local Governments for Sustainability
- Insurance Council of New Zealand
- Interamerican Hellenic Insurance Group
- La Banque Postale
- Liberty Seguros
- Microinsurance Network
- Mongeral Aegon
- National Reinsurance Corporation of the Philippines
- Namibia National Reinsurance Corporation
- Peak Re
- Philippines Insurers & Reinsurers Association
- Ping An Insurance
- Porto Seguro
- RepRisk
- Risk Management Solutions
- Santam
- SCOR
- Seguradora Líder DPVAT
- Sompo Japan Insurance Inc.
- Swiss Re
- Tokio Marine Seguradora
- Zurich Insurance Group

## Development finance institutions

- Asian Infrastructure Investment Bank (AIIB)
- Brazilian Development Bank (BNDES)
- Corporacion Andina de Fomento (CAF)
- Development Bank of Japan (DBJ)
- Development Bank of Southern Africa (DBSA)
- European Bank for Reconstruction and Development (EBRD)
- European Investment Bank (EIB)
- Inter-American Development Bank (IADB)
- International Finance Corporation (IFC)
- Investeringsfonden for udviklingslande (IFU)
- New Development Bank (NDB)
- US International Development Finance Corporation (DFC)
- West African Development Bank (BOAD)

## Construction

- Cemex

## Hydropower

- China Three Gorges (CTG)
- International Hydropower Association (IHA) including more than 90 company members

## Jewellery

- Responsible Jewellery Council including more than 1,200 company members

## Sports

- World Rowing Federation



**unesco**

**World Heritage Convention**

7, place de Fontenoy  
75352 Paris 07 SP France

 [wh-info@unesco.org](mailto:wh-info@unesco.org)

 <https://whc.unesco.org/en/no-go-commitment>



**Flanders**  
State of the Art

**Follow us**  
@UNESCO  
#WorldHeritage  
#TheNext50

