



July 10, 2017

Dear Members of the Cultural Property Advisory Committee,

I write on behalf of the American Schools of Oriental Research (ASOR) to express my organization's strong support for approving the request made by the Government of Libya to the Government of the United States under Article 9 of the 1970 UNESCO *Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property*. This request seeks U.S. import restrictions on archaeological and/or ethnological materials representing Libya's cultural patrimony from the prehistoric through Ottoman Era. ASOR, founded in 1900, is an international organization of archaeologists, historians, linguists, and cultural heritage professionals who initiate, encourage, and support research into, and public understanding of, the history and cultures of the Near East and wider Mediterranean. Because of who we are and where we work, our membership of 1800 professional members and another 14,000 "Friends of ASOR" has a strong interest in the long-term preservation, presentation, and safeguarding of the cultural heritage of Libya.

Modern-day Libya is home to some of the oldest and most significant archaeological remains in the world. Most famous, perhaps, are the Greek and Roman colonies found on Libya's Mediterranean coast, such as Cyrene (founded in the late seventh century BCE), Leptis Magna (which reached its peak during the reign of the Roman emperor Septimus Severus, in the second century CE), and Sabratha (rebuilt as a Roman city in the second and third centuries CE). All of these are UNESCO World Heritage Sites. Libya's southwestern desert is home to equally important prehistoric materials, such as the spectacular rock art that dates back to 12,000 BCE that is found at the UNESCO World Heritage Site of Tadrart Acacus. Other important prehistoric remains are found in the country's south, southeast, and central deserts; the Mediterranean coast, moreover, features not just Greek and Roman sites but ports and trading posts from the seventh and sixth centuries BCE, established by the Phoenician peoples of modern-day Lebanon. Other cultural heritage sites of note come from the Byzantine, Islamic, and Ottoman periods; most notable, perhaps, is the oasis town of Ghadames, Libya's so-called "pearl of the desert" and the country's fifth UNESCO World Heritage Site.

These and other sites in Libya – like archaeological remains throughout the Middle East and Mediterranean basin – have long been subject to pillage and looting. However, the dangers of pillage and looting have become more intense since the Libyan Revolution of 2011 and the fall of the government of Muammar Gaddafi. More specifically: as Libya has grappled with the challenges of establishing a functioning polity in the post-Gaddafi era, many state services have been either suspended or significantly curtailed. These included services for cultural heritage and management. For example, while sites such as Cyrene, Leptis Magna, and Sabratha are still open to visitors (almost exclusively Libyans, given the current political

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situation), the Libyan authorities are struggling to find funds to provide proper upkeep, maintenance, or security at these venues.

That said, the Libyan authorities are doing some amazing things to protect their cultural patrimony. Just recently, for example, we at ASOR have been extremely heartened to learn of the recuperation of the collections held in the storeroom in Souq al Hout, after the Libyan National Army liberated this Benghazi neighborhood. For more than two years, the Department of Antiquities' Benghazi office has been uncertain about the status of this premier local collection because of the prolonged, heavy fighting in the area. Now, though, Department of Antiquities staffers report that their initial impression is that the collection is intact, and work is underway to double-check that all items on their original inventory have indeed been recovered.

Still, challenges persist, and we at ASOR know well – based on a project we began in August 2014 to document, protect, and preserve the cultural heritage of war-torn Syria and northern Iraq – the dangers that a lack of upkeep, maintenance, and security can cause to archaeological sites. Indeed, we estimate that, *at a minimum*, 1300 cultural heritage sites in Syria and northern Iraq have sustained damage since the start of our work in August 2014, with 915 of these incidents occurring in the fifteen-month period between September 2015 and December 2016.

To be sure, much of this damage is due to intentional destruction and military explosives, especially in northern Iraq – dangers that thankfully are not present in the same way in Libya. However, a significant amount of the damage we have documented in Syria is due to opportunistic looting undertaken by local individuals. These locals, understandably, are looking for some means of income within their shattered economy, but the effect on ancient sites has nevertheless been devastating. Appended to this letter, for example, are images of the cratered landscapes that now characterize the ancient Syrian sites of Apamea and Dura Europos, each crater representing a pit dug by looters.

It is important to realize, moreover, that these opportunistic looters often determine where to dig their pits using metal detectors, meaning that without proper protections in place, Libyan sites rich in coins – including the Greek and Roman sites of Cyrene, Leptis Magna, and Sabratha, as well as Greek ruins such as Apollonia, Ptolemais, and Taugheria and the numerous surviving Roman villas – are vulnerable in the same way that Syrian sites have been. Moreover, just as Syrian antiquities have been smuggled out of Syria through Lebanon and, especially, Turkey, and then moved onward to be sold illegally on the worldwide antiquities market, we have heard anecdotally from colleagues in Egypt that looting camps have been set up along the Libya-Egypt border, with objects that have been taken out of Libya being moved through Egypt and then onward into various international markets.



Furthermore, in 2014, the so-called Islamic State, or ISIS/ISIL/Da'esh, began to establish itself in Libya, taking advantage of the unstable political situation there. Again, we at ASOR know well – based on our work in Syria and northern Iraq – what dangers ISIS can present to a nation's cultural heritage. Indeed, in Syria, ASOR has been able to help US authorities document a pattern of theft, whereby ISIS – by issuing looting permits in the territories it controls and by imposing a 20% tax on antiquities traders – facilitates the plundering of archeological sites and then supports itself with the proceeds (estimated in a recent *Wall Street Journal* report to be in the range of \$88 million/year).

In short, as the lessons of Syria and northern Iraq make all too painfully clear, Libya's political instability and the presence of Da'esh within the country place the nation's cultural heritage in grave danger. It is no wonder, then, that in 2015, the International Council of Museums issued an emergency "Red List" of Libyan cultural heritage objects at risk, and no wonder that in 2016, UNESCO placed all five of Libya's World Heritage Sites on the list of "World Heritage in Danger."

Restricting the import of archaeological and/or ethnological materials representing Libya's cultural patrimony is an important means by which the United States can act to quell this threat. Indeed, because the United States is a—if not *the*—prime market for archaeological materials exported from throughout locations in the Middle East and the Mediterranean basin, including Libya, this country's acting to stem imports from Libya can have a significant effect in discouraging in-country looting and pillaging. Because, moreover, Libya is so rich in sites that can be effectively looted and pillaged using metal detectors -- more specifically, Greek and Roman sites whose artifactual remains include ancient coins -- it is important that any import restrictions the U.S. might impose include coins.

Simply put: by restricting the market for Libyan antiquities, including coins, we reduce the damage to Libya's cultural heritage. For this reasons, ASOR strongly supports the United States Government putting into place import restrictions on archaeological and/or ethnological materials representing Libya's cultural patrimony from the prehistoric through Ottoman Era.

Sincerely yours,

Susan Ackerman
ASOR President



Image showing looting pits at the Syrian site of Apamea (image taken from the ASOR Blog, at <http://asorblog.org/2014/07/08/syrian-archaeology-scale-of-the-scandal/>):

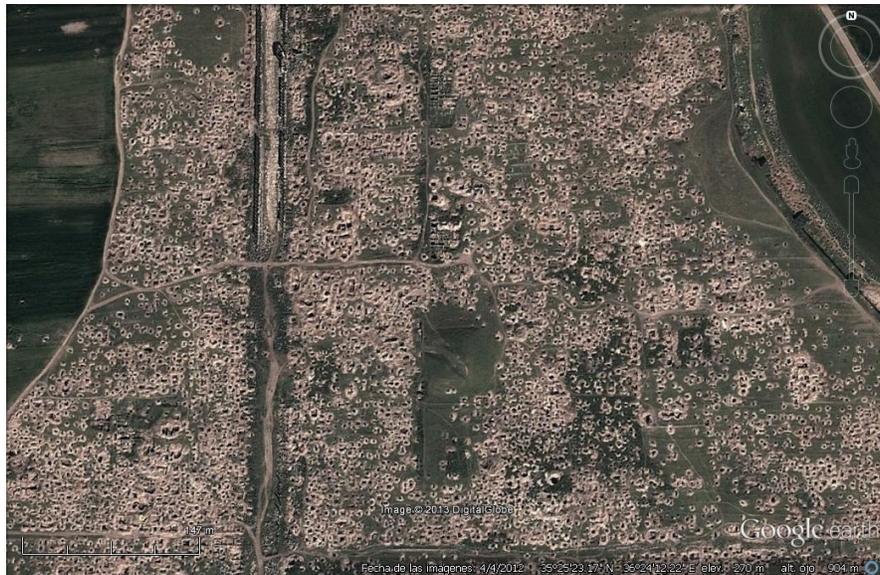


Image showing looting pits at the Syrian site of Dura Europos (Image courtesy ASOR Cultural Heritage Initiatives):

