



## SOCIETY FOR AMERICAN ARCHAEOLOGY

**Comments of the Society for American Archaeology  
To the State Department Cultural Property Advisory Committee  
On the request by the Government of Libya  
To the Government of the United States of America  
For import restrictions on certain Libyan archaeological and ethnological material**

**July 10, 2017**

The Society for American Archaeology (SAA) is pleased to provide the following comments in support of the request by the Government of Libya for the protection of that nation's extensive archaeological and ethnographic heritage, which is under severe and ongoing threat from looting and pillage.

SAA is an international organization that, since its founding in 1934, has been dedicated to the research about and interpretation and protection of the archaeological heritage of the Americas. With more than 7,000 members, SAA represents professional archaeologists in colleges and universities, museums, government agencies, and the private sector. SAA has members in all 50 states as well as many other nations around the world.

SAA and numerous other organizations are working to prevent the destruction of international cultural heritage sites, and to interdict the trafficking of illicitly-excavated antiquities that such destruction generates. Groups such as the U.S. Committee of the Blue Shield, the Antiquities Coalition, and the Lawyers' Committee for Cultural Heritage Protection, to name just a few, are endeavoring to bring to light and combat the physical damage and loss of knowledge caused by such looting and trafficking. Nations experiencing armed conflict through invasion or civil war—nations like Libya—are especially vulnerable.

While the brevity of the public comment period for this proposed agreement prevents us from submitting a more detailed written analysis, it is possible to state that there are few nations that have such an ancient, extensive, and varied archaeological record as Libya. The timeline runs from prehistory through the Ottoman Empire, and includes cultures from the Saharan peoples to the classical Greeks and Romans, from the Phoenicians, Arabs and Egyptians of the ancient and medieval Near East to the Italians and French of modern Europe. Each of these peoples, in their time, left substantial material traces of their presence in Libya.

While always a target of pillage, Libya's situation has grown demonstrably worse since the start of the civil conflict in 2011. The destabilization of society has led to a sharp increase, across that nation, in looting and destruction of sites by pillagers and extremist groups. As mentioned in the Libyan government's request, in 2016 the UNESCO World Heritage Committee placed all five of Libya's World Heritage Sites on the List of World Heritage in Danger.

Nevertheless, while the situation is severe, Libya already has a better foundation in place to fight against looting than do many nations. The new government has maintained the nation's domestic laws and international agreements for cultural resources preservation. The Department of Antiquities (DOA) was, prior to the start of hostilities, well-organized and is in the process of re-asserting itself where it is

possible to do so, given security and financial realities. There is also an extensive network of museums and laboratories that will re-open when the strife abates. In the meantime, DOA and museum personnel continue to protect collections to the best of their ability.

There are those who will say that entering into an agreement with Libya at this point would be ineffective, as that nation is neither in a position to provide adequate protection for its material heritage, nor to engage in the kind of international scientific and cultural exchange envisioned in the Cultural Property Implementation Act. SAA believes that this is putting the cart before the horse. Import restrictions on Libyan archaeological and ethnographic materials can only help that nation deter looting, by dampening the demand for illicit items. Meanwhile, the rest of the Memorandum of Understanding would serve as a valuable framework to help Libya “stand up” its protection efforts, the DOA, the museums and other domestic cultural institutions in the wake of the armed conflict. Only if this happens will its material heritage be preserved, thus allowing for international cultural exchange in the first place.

SAA respectfully urges the Committee to recommend the approval of the Libyan request.