



## Civil Society Dialogue Network Policy Meeting

# The EU Concept on Cultural Heritage as a Component for Peace and Security in Conflict and Crisis Zones: Gathering Civil Society Input

3–4 March 2021

Online

## MEETING REPORT

The overall objective of the meeting was to gather analysis and recommendations from civil society experts as part of the development of an EU Concept on cultural heritage as a component for peace and security in conflict and crisis zones (hereafter 'Concept').

The meeting brought together 35 participants, including 26 civil society experts and officials from the European Commission (EC) and the European External Action Service (EEAS).

Discussions were held under the Chatham House Rule. There was no attempt to reach a consensus during the meeting or through this report, which is a summary of the key points that were raised by the civil society participants.

Unless specified otherwise, 'cultural heritage' is understood to refer to both tangible (material) and intangible (immaterial) cultural heritage in this report.

### The Civil Society Dialogue Network

The Civil Society Dialogue Network (CSDN) is a mechanism for dialogue between civil society and EU policy-makers on issues related to peace and conflict. It is co-financed by the European Union (Instrument contributing to Stability and Peace). It is managed by the European Peacebuilding Liaison Office (EPLO), a civil society network, in co-operation with the European Commission (EC) and the European External Action Service (EEAS). The fourth phase of the CSDN will last from 2020 to 2023. For more information, please visit the [EPLO website](#).

## Approaching cultural heritage in conflicts and crises: Overview and principles

Civil society participants raised the following points on the principles and elements that should drive and inform the overall approach of the European Union (EU) to cultural heritage in conflicts and crises.

1. The EU should embrace an open, flexible, fluid, holistic and self-reflective understanding of what constitutes 'cultural heritage'.
  - There is no hard and fast definition of what constitutes 'cultural heritage' and to whom: what some consider as cultural heritage may not be recognised as such by others. In particular, minority, subnational groups may have their own cultural heritage that is not acknowledged as such by dominant groups, the national government and/or external actors. External actors in particular need to be wary of projecting their assumptions of what does (not) constitute cultural heritage into external contexts, particularly where different local understandings may be in competition.
  - The EU should recognise that cultural heritage can take vastly different forms, and that it should be understood as an ecosystem rather than a set of distinct elements. It can be complex and messy to understand and navigate, and all *tangible* cultural heritage also has *intangible* dimensions. The EU should map the complexity of cultural heritage in contexts where it is looking to engage, and it should avoid simplified characterisations and reductions, which can be harmful.
  - Cultural heritage should be considered as dynamic rather than static: it changes over time. It can find its roots in the 'deep' past and/or be a contemporary creation, including as part of the legacy of a recent conflict. It can also be transformed positively by being challenged and contested.
  - Cultural heritage is not necessarily 'neutral'. It is situated within a wider context of gendered power relations and political, social and economic dynamics. Actors may mobilise cultural heritage to affect the context and the people living in and with it.
  - The EU should understand what local populations define as cultural heritage and what is of the highest significance and priority to them, even if this does not correspond to the EU's own assessments and priorities.<sup>1</sup>
2. The EU should always put different people, particularly the marginalised, their lives and livelihoods at the centre of its approach to cultural heritage, in an inclusive manner.
  - The EU should consult and engage with local populations (including diverse women, young people and other marginalised groups, taking into account gender, class, religion, ethnicity, (dis)ability, rural/urban divides, etc., and how these may intersect) in order to understand and to base its engagements on their diverse perceptions, lived experiences, needs and priorities.
  - The EU should respect and promote local peoples' ownership over their cultural heritage and ensure ownership of projects by local populations and inclusive civil society, and it should

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<sup>1</sup> This was illustrated through the example of traditional alliance systems and justice mechanisms being recognised as cultural heritage in Eastern Indonesia, whilst this is not necessarily the case at the international level.

support locally-driven initiatives. Ownership over their cultural heritage is often a matter of dignity and identity for communities, and it can be essential to post-conflict healing processes (including as it may both be a site of conflict and serve as an arena for intercommunal sharing).<sup>2</sup>

- The EU should ensure that it does not put more effort into saving and rebuilding tangible cultural heritage (e.g. monuments) than into protecting people's lives, supporting their livelihoods, and helping to rebuild their homes and the infrastructure they depend on (including for access to water, transportation, etc.). Protecting cultural heritage loses importance when people cannot support themselves.
  - The EU should recognise that people and their cultural heritage (especially their intangible cultural heritage) are indivisibly intertwined.
  - The EU should ensure that it protects and supports intangible heritage as much as tangible heritage.
  - The EU should ensure that it consults meaningfully diverse local population groups and civil society and does not just listen to the loudest voices; local peoples' perspectives and positions may be contradictory. The EU should embrace, seek to understand and navigate this complexity sensitively, without oversimplifying it.
3. The EU should ensure that it analyses and understands the wider context in which the cultural heritage is situated (including drivers of peace and of conflict), and the role(s) of cultural heritage within it, and it should ensure that this robust conflict- and gender-sensitive analysis informs its engagements.
- The EU should analyse and take into account, inter alia, the gendered distribution of power and resources, the peace and conflict dynamics, the social and gender norms, the socio-economic realities, the roles of different actors and stakeholders (including of refugees, diasporas and other people on the move), historical factors, the effects of climate change, cross-border and cross-regional dynamics, and the possible blurring of conflict/post-conflict phases within the context, and how cultural heritage relates to, and is affected by, each of these.<sup>3</sup>
  - The EU should understand the role that cultural heritage plays and/or may play with respect to the conflict, including how it is perceived by different parties to the conflict, and different local population groups. This includes understanding if the cultural heritage has been made 'toxic'<sup>4</sup> and instrumentalised by certain actors to drive conflict (alongside other factors), if it is or may be mobilised to build peace, how it may relate to the dominance or marginalisation of certain groups, etc. This also includes understanding why cultural heritage is destroyed, and which (local, national and/or international) audience(s) the perpetrators of the destruction may seek to target and/or influence.
  - The EU should not have a siloed approach to cultural heritage; it should instead consider how it intersects with other issues, particularly other issues of social justice.

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<sup>2</sup> This includes supporting the initiatives that these actors wish to prioritise as part of reconstruction efforts, as they may not want to focus on the same cultural heritage as international actors.

<sup>3</sup> The negative effects of climate change on cultural heritage that were discussed included destructive effects on built cultural heritage; the fragmentation of populations; the loss of socio-cultural interactions, intangible cultural heritage and cultural diversity; declining numbers of visitors (making it difficult to fund cultural heritage institutions); the loss of socio-economic activities, etc.

<sup>4</sup> This was notably illustrated by referring to cultural heritage promoting warfare values, war heroes, or discrimination (e.g. cultural heritage from apartheid in South Africa).

4. The EU should understand, reflect on and address different forms of violence and conflict around cultural heritage.
  - The EU should identify and respond to the discursive violence against population groups and their cultural heritage, that involve negative constructions of the 'Other', polarisation, hate speech, etc. This type of violence normalises and makes it possible for more structured and physical violence and destruction to emerge and to be seen as acceptable and legitimate.
  - The cultural heritage of minority groups may be destroyed by (or with the approval of) actors from dominant groups in situations that are not characterised by external actors as armed conflict. The EU should take a broad view on conflict, encompassing not only armed conflict but also societal unrest.
5. The EU should embrace a long-term approach to cultural heritage, and it should engage on cultural heritage in peacetime and before, during and after conflict.
  - The EU should design its engagements based on whether they take place during peacetime or before, during and/or after conflict, define their objectives clearly, and determine how they may be adapted based on the evolution of the situation.<sup>5</sup>
  - The EU should engage with diverse partners and stakeholders on cultural heritage in peacetime and before any crisis or conflict occurs,<sup>6</sup> as (a) it is essential to develop relationships and to build trust early in order to be able to act in a timely manner when a crisis does erupt, (b) the protection of cultural heritage during conflict is made easier when safeguarding and monitoring measures have been implemented since before the conflict (including inventories),<sup>7</sup> and (c) cultural heritage can be at risk and in need of protection even if there is no ongoing armed conflict.<sup>8</sup>
  - The EU should support efforts to protect people and their cultural heritage during conflict, instead of waiting until conflict is over to possibly recover and restore cultural heritage. Cultural heritage can be deeply engrained in people's daily lives (particularly intangible cultural heritage) and its destruction may be irreversibly harmful.
  - The EU should recognise that long time frames are necessary to reconstruct cultural heritage and to use it as part of peacebuilding efforts, and it should ensure that it provides long-term support to such efforts.
6. The EU should ensure that its approach to cultural heritage respects the 'Do No Harm' principle and is coherent.
  - The EU should recognise that any engagement is political as it has an impact on the power dynamics in a given context. The EU should ensure that it understands how its engagements (may) impact the context and its dynamics, that its engagements do no harm, that it does not impose framings that are disconnected from the perceptions of local populations, and that it is careful about privileging actors and voices that may already be more powerful than others.
  - The EU should be careful to recognise and to allow for complexity and fluidity in understanding 'cultural heritage' as part of its protection and safeguarding efforts, in order to avoid protecting a

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<sup>5</sup> The EU should recognise that the post-conflict phase can share many of the same characteristics as conflict and is not necessarily the same as peace.

<sup>6</sup> Ideally there should be a permanent engagement.

<sup>7</sup> The guiding document refers to 'immediate safeguarding measures', however safeguarding measures should be understood as long-term measures that are put in place during peacetime. The examples that were discussed also included education measures.

<sup>8</sup> This was illustrated through the example of Yemen, where the destruction of cultural heritage predates the start of the current conflict.

status quo that can be unjust, discriminatory and harmful toward certain population groups (due to gender, class, religion, ethnicity, (dis)ability, where they live, etc.).<sup>9</sup>

- The EU should ensure that its approach to cultural heritage is not undermined (directly or indirectly) by other dimensions of its external action or by its internal policies. This includes its possible military or other security co-operation with governments whose security agents commit abuses against members of their population / engage in the destruction of cultural heritage. This also includes how EU militarisation may contribute to climate change.
  - The EU should be careful with respect to the narratives that drive engagements relating to cultural heritage. In particular, the narrative that subsumes the protection of cultural heritage under the objective of combating terrorism (as certain armed groups use illicit trafficking of cultural goods to fund their operations) can be harmful and contested by local populations, and it implies risks for the sustainability and the geographic scope of efforts (as programmes may be abandoned or not pursued when or where armed groups are no longer active).
7. The EU should reflect critically on the role of cultural heritage in Europe and on the role of Europe with respect to cultural heritage from/in other regions.
- The EU should ensure that it does not engage in, or project an image of, ‘white saviour’, neocolonialist and paternalistic behaviour in how it approaches cultural heritage and engages with local populations.<sup>10</sup> In particular, it should avoid imposing its framings and understandings on local issues, it should respect the expertise, the experience and the essential role of local actors, and it should avoid using language relating to pity or charity in its exchanges with partners and local populations. Instead, it should emphasise how these issues impact everyone, including people in Europe.
  - The EU should embrace the role of cultural heritage as part of efforts to welcome migrants and refugees in Europe, including in fostering social cohesion between them and host communities.
  - The EU should reflect on what approaching cultural heritage from a peacebuilding perspective also means with respect to questions of justice around the restitution of cultural heritage that was removed from certain countries, as cultural heritage from numerous non-European countries can be found in European museums and institutions. Governments and populations may consider that their cultural heritage should be returned to their countries, and grievances over these issues can contribute to mistrust with respect to efforts to protect cultural heritage in conflicts and crises.
  - The illicit trafficking of cultural heritage exists because there is an international demand for artefacts and a willingness to accept them through illicit channels, including within the EU. The EU should engage on this issue with EU Member States and partner countries from which the demand emanates.

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<sup>9</sup> This was illustrated by pointing out that what some may label as acts of ‘vandalism’ toward cultural heritage may sometimes be part of a challenge to problematic aspects of cultural heritage, and represent developments that cultural heritage may go through as society changes.

<sup>10</sup> A participant expressed that the phrase ‘build back better’ should not be employed in the context of archaeology and restoration, as it denotes a paternalistic approach and goes against the objective of archaeology for built cultural heritage, which is to restore monuments as they used to be.

## Engaging on cultural heritage in conflicts and crises: Operational recommendations

Civil society participants raised the following points on how the EU should engage on cultural heritage in conflicts and crises to help to safeguard, protect, recover and restore it, and to mobilise it for peace:

1. The EU should promote inclusive (understandings of) cultural heritage and defuse possible toxic uses of cultural heritage, including through education.
  - The EU should support efforts to educate local populations (of all ages and genders) on their cultural heritage, including through education programmes and cultural heritage institutions. In particular, the EU should support initiatives to educate people on the hybridity and diverse origins of their cultural heritage, deconstructing artificial and selective monocultural narratives of the past, and highlighting how cultural heritage reflects the lived experiences of diverse communities.<sup>11</sup> It is essential for communities to understand how the development of their cultural heritage (and their community's history) benefited from exchanges with (and the contributions of) other communities, and how their cultural heritage may be 'shared' with other communities who may also see it as part of their history and identity.
  - The EU should promote inclusive cultural heritage and inclusive education and narratives about cultural heritage, particularly with respect to the contributions of diverse women, young people and marginalised groups to it.
  - The EU should support efforts aimed at encouraging communities to learn about and enjoy the cultural heritage of other communities, including by participating in their cultural celebrations and by visiting their cultural sites in a sensitive manner.
  - The EU should support the transformation of toxic cultural heritage into cultural heritage that is conducive to peace (when such a transformation is possible), and push back against the use of cultural heritage to artificially separate and hierarchise the cultural identities of communities, to foster polarisation, tensions and conflict between them, and to normalise violence against other communities.<sup>12</sup> As part of these efforts, the EU should support measures to address historical injustices and recriminations. It should also collect and share lessons learned and best practices in successfully transforming cultural heritage from toxic to conducive to peace.

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<sup>11</sup> A participant called for the EU Concept to highlight the value of cultural heritage interpretation.

<sup>12</sup> The positive transformation of cultural heritage from toxic to conducive to peace was notably illustrated with the example of an initiative aiming to transform Her Majesty's Prison Maze (previously the Long Kesh Detention Centre) in Northern Ireland, which was used as part of the Troubles and became a symbol of the conflict, into a peacebuilding and conflict resolution centre where lessons from the Troubles could be learned and diffused.

2. The EU should support the initiatives and the ownership of local populations and civil society during peacetime and before, during and after conflict, to safeguard, protect, recover, restore and carry out (long-term) research on their cultural heritage, and to mobilise it for peace.<sup>13</sup>
- The EU should support in particular locally-led, grassroots civil society organisations (CSOs) that employ people from affected areas, especially diverse women, young people and other marginalised groups (it should especially support multicultural local organisations and teams).
  - The EU should help to train and build the capacity of local populations and CSOs in order to enable them to pursue their own initiatives, and support spaces for mutual learning and for the sharing of lessons learned and best practices.<sup>14</sup> The EU should particularly support their ability to protect cultural heritage during conflict, as local actors will often be the only ones present in affected areas.
  - The EU should engage with and support the positive roles that local community leaders may play.
  - The EU should also recognise, engage with and support the positive roles that diverse diaspora groups may play during different conflict phases, including for reconstruction.
  - The EU should ensure that it addresses linguistic obstacles as part of its efforts to ensure that it grasps the views of, and provides adequate support to, local populations and CSOs on their cultural heritage. This includes ‘translating’ concepts and terms relating to cultural heritage that are used at the international level, being sensitive to how international terminologies may be perceived locally, and ensuring that it seeks to understand how local populations think and speak about their cultural heritage. The EU should also expand its partnerships with actors that do not speak European languages.
  - The EU should ensure that the support and funding it provides to local CSOs does not put them in a difficult position with respect to local population groups and to the government. Local CSOs, particularly those working on the cultural heritage of minority groups, sometimes rely heavily on external funding. However, local populations often see external funding as suspicious because of possible undisclosed (political) aims, paternalistic/neocolonial motivations, etc. In addition, governments that seek to restrict civic space and delegitimise/erase the cultural heritage of minority groups sometimes justify their attacks on local CSOs by referring to their external funding. The EU should push back against this as part of its political dialogue with these governments.
  - The EU should provide (economic) incentives for local populations to participate in the safeguarding, protection, recovery and restoration of cultural heritage, and it should ensure that engagements contribute to addressing the economic and development needs of local communities and to enhancing their resilience, including by prioritising the involvement of a local workforce.
  - The EU should ensure that diverse local populations are strongly involved from the start in efforts to generate economic and social value from cultural heritage (e.g. through tourism), and that business models work to the fair benefit of all local population groups.

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<sup>13</sup> The EU should ensure that it supports and uses (long-term) research carried out by local civil society actors on their cultural heritage (including anthropological and ethnographic research) to inform its engagements (including with respect to understanding local perceptions of cultural heritage, whether it has or has not helped to prevent conflict (including in the distant past), how it was possibly mobilised to fuel conflict, how it may be used for reconciliation, how it may be transformed/reconstructed to be made more inclusive, which local actors may be taken on board as part of engagements, etc.). This type of support to local research efforts can be helpful to develop other partnerships with local actors.

<sup>14</sup> This includes supporting the development of basic capacities, including for accounting.

- The EU should help to save, protect and provide livelihood opportunities to people with specific knowledge of cultural heritage at risk (e.g. artisanship or knowledge of oral traditions).
  - The EU should support the role of the media (including social media) as part of education and peacebuilding efforts around cultural heritage, including in educating people about the cultural heritage of minority groups and in promoting exchanges and collaboration between communities.
  - The EU should ensure that its funding and project management tools (including its reporting system) are adapted to the needs and capacities of local actors, especially those working in cross-border areas.
  - The EU should support and protect the work of civil society actors on cultural heritage in areas under the control of armed non-state actors.
  - The EU should support platforms for local civil society actors and engage them meaningfully in international conversations and policy-making processes on cultural heritage.
  - The EU could make some of its support to partner governments conditional on the provision of direct support to civil society actors.
3. The EU should support efforts that bring people together around cultural heritage in order to mobilise it for peace and conflict prevention.
- The EU should ensure that its efforts to promote the use of cultural heritage for peace are based on how local populations wish to rebuild their lives and not on external framings of what reconciliation 'should' involve.<sup>15</sup>
  - The EU should support diverse efforts around cultural heritage that foster the development of interpersonal relationships across communities, as well as common causes that communities can rally behind together.<sup>16</sup> These include initiatives that bring people from different religions together to manage common holy sites and/or to engage in other activities around shared religious heritage, for example through actions to deal with practical issues.<sup>17</sup>
  - The EU should encourage conflict parties to agree to protect cultural heritage (whether shared or not), as such agreements can pave the way for broader peace agreements. The EU should also support efforts to build on possible common attachments to cultural heritage to bring about reconciliation between different parties.
  - The EU should recognise that cultural heritage may be created during conflict. Such cultural heritage may be toxic or conducive to peace, and the EU should support its use to build inclusive peace and seize opportunities to transform it from the former to the latter.<sup>18</sup>

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<sup>15</sup> For example, local populations may wish to focus on 'day-to-day rebuilding', finding a sense of normality, rebuilding the social connections they had prior to the conflict, etc. As a result, it may be more helpful for efforts to mobilise cultural heritage for peace and social cohesion to focus on the (re)creation of professional networks, the creation of spaces where people can engage without talking about the conflict, the fostering of a sense of a common future through practical work together, etc. A recurring criticism from local communities is that external actors often seek to set up and/or support reconciliation projects based on preconceived and misguided ideas of overcoming divisions through 'talking cures', that too often depoliticise local dynamics, and ignore prevailing victim vulnerabilities, the socioeconomic consequences of the war, etc.

<sup>16</sup> This was illustrated through the examples of (a) projects employing members from different communities to restore monuments primarily associated with 'the others', and (b) different Iraqi ethnic groups coming together to promote the inclusion of the Mesopotamian Marshes in Southern Iraq on the UNESCO World Heritage List.

<sup>17</sup> This was illustrated through the examples of (a) bringing people together to repair pavements, clean up rubbish, resolve parking issues, etc., around a shared holy site on Mount Zion, and (b) excavating Christian, Jewish and Islamic cultural heritage with the help of local communities in the Horn of Africa, so that they would see the diversity of their cultural heritage.

<sup>18</sup> The War Childhood Museum in Sarajevo was discussed as an example of a positive initiative using cultural heritage created during conflict to build peace. The museum aims to portray everyday life for a child or

- The EU should encourage and support the emergence of a community of practice bringing together cultural heritage experts and peacebuilding experts in order to foster exchanges between them, and to facilitate sharing lessons learned and good practices in using cultural heritage to contribute to peace and reconciliation.
4. The EU should monitor attacks on cultural heritage, and its use to fuel tensions between groups, as part of its efforts to prevent conflict.
- The EU should:
    - include an indicator relating to cultural heritage in its early warning system;
    - develop and maintain contacts with local communities in various contexts (based on previous support to locally-driven projects) so that they may alert, advise and assist the EU when threats to cultural heritage emerge;
    - support the existence of a permanent network of experts for this purpose;
    - map cultural heritage that may become toxic or be instrumentalised by certain actors to drive conflict.
  - Strong signals of upcoming violent conflict may include (a) the use of cultural heritage as part of ethnic/nationalistic politics (often through the construction of artificial and selective monocultural narratives of a community's past), often in association with discursive attacks on the cultural heritage of other groups, and (b) physical attacks on cultural heritage (particularly that of minority groups), especially with the aim of erasing the traces of the historical presence of groups in certain areas (often in order to justify unequal access to resources and/or to drive them away).
5. The EU should engage with and support diverse actors at the local, national and international levels to safeguard, protect, recover and restore cultural heritage.
- The EU should encourage its partners to pursue inclusive cultural heritage policies and measures, including with respect to the involvement and position of diverse civil society actors, especially of women, young people and other marginalised groups, at all levels.
  - The EU should support the institutional capacities, infrastructure, policies and legal frameworks of its partners to safeguard, protect, recover and restore cultural heritage, including through training, learning and capacity building measures. This includes supporting their ability to ensure the security of cultural heritage sites, storage places and museums, and supporting initiatives by diverse actors (including civil society actors) to digitalise tangible and intangible cultural heritage.<sup>19</sup>
  - The EU should ensure that it engages with a variety of actors, it should promote a holistic understanding of cultural heritage with its partners, and it should encourage inter-agency co-operation when working with international organisations and national governments.
  - The EU should support the inclusion of cultural heritage in truth commissions, as misinformation about who damaged what and why during conflict can contribute to resentment long after the conflict is over.
  - The EU should support and work with local and national actors before the end of conflicts to ensure that post-conflict reconstruction is owned by local populations and that cultural heritage will be protected during that phase. In certain contexts, investors purchase property at low

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teenager during the siege and, as such, opens up spaces to engage with and commemorate the war beyond ethno-nationalist, divisive narratives.

<sup>19</sup> In line with previous points on adopting a flexible and holistic approach to cultural heritage, diverse types of cultural heritage sites should be protected, including libraries, archives and other types of sites that may be overlooked by international and national actors but that may have particular significance to local actors.

prices during a conflict with the objective of maximising their economic gains by rebuilding after the conflict is over, with little concern for local cultural heritage.

- In certain contexts, the EU should engage with non-state actors, including non-state armed groups, that are protecting and preserving cultural heritage in conflict areas (e.g. religious temples, historical monuments, etc.), in order to support these efforts.
  - The EU should generate cross-sectoral support and partnerships for its work on cultural heritage by emphasising the links between the protection of cultural heritage and other areas of activity, including the protection of endangered animals and flora, climate change adaptation and mitigation, tourism, etc.
6. The EU should ensure that its engagements respect the 'Do No Harm' principle and do not deprive populations of their cultural heritage, and that relevant external action instruments are used in a coherent manner.
- The EU should not support cultural heritage actions (particularly archaeological projects) that reflect sensationalised and extractive perspectives on tangible cultural heritage (particularly on antiquities) that are disconnected from the perceptions of local populations and that do not benefit them.
  - The EU should ensure that it does not exacerbate tensions and risks for local populations and their cultural heritage through militarised interventions (including if their objective is to protect sites). The use of armed forces by external actors can be perceived negatively by local populations and have harmful effects.
  - The EU should ensure that the police and armed forces it deploys as part of Common Security and Defence Policy (CSDP) missions are aware of the importance of cultural heritage and are well trained on how to be sensitive to the perceptions of local populations, to the realities of local cultural heritage (including intangible cultural heritage), and to how to protect it.
  - The EU should strengthen the integration between its policies and engagements relating to peacebuilding, cultural heritage, humanitarian aid and development aid.
  - The EU should not make use of safe havens outside affected countries; it should instead favour the creation of refuges within affected countries.<sup>20</sup> It should ensure transparency and collaboration with local and national actors in doing so, with a clear mutual understanding of how, when and to whom cultural property is returned once peace is restored.
7. The EU should address the illicit trafficking of cultural heritage through engagements that are sensitive to the needs of local populations and by enhancing the integration of the different instruments at its disposal.
- The EU should recognise that the involvement of local people in the illicit trafficking of cultural heritage (e.g. to dig, seize and/or transport artefacts) often stems from their need to support themselves in a context where their livelihoods have been destroyed by conflict. As part of its efforts to address illicit trafficking, the EU should address the needs of local populations and help to provide them with sustainable alternative livelihoods.
  - The EU should support efforts to raise awareness about the importance of cultural heritage among local populations in order to help reduce the selling of artefacts to outsiders.

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<sup>20</sup> It was explained that safe havens are often perceived as 'white saviour' and/or neocolonial enterprises, and that they can make it difficult for local and national actors to retrieve their cultural heritage. The national refuge systems used by the Netherlands and Switzerland were mentioned as models to follow.

- The EU should engage with local partners, including local communities, civil society actors, authorities and police forces, to design, implement and support context-specific responses to illicit trafficking.
- The EU should invest in new technologies to better document, inventory and trace cultural heritage, and it should further develop relevant databases of cultural goods (including religious cultural heritage, which is often left out), whilst avoiding the duplication of efforts.
- The EU should encourage its Member States and international partners to adopt and implement relevant international conventions and legal frameworks.<sup>21</sup>
- The EU should avoid setting a financial threshold for illicit trafficking measures, as the evidence available indicates that the bulk of the trade is small artefacts that have a high cumulative value.
- The EU should support efforts to enhance the regulation and control of imports of cultural goods and of its related internal markets in order to prevent the use of illicit channels. It should also enhance the implementation of existing regulations and directives.

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<sup>21</sup> These include the Council of Europe Convention on Offences relating to Cultural Property (2017); the Hague Convention for the Protection of Cultural Property in the Event of Armed Conflict (1954), both of its Protocols (1954, 1999) and the Regulations, Recommendations and Guidelines for Implementation; the World Heritage Convention and its Recommendations and Guidelines (1972); and UN Security Council Resolution 2199 (2015).