

Cultural Property Advisory Committee
Cultural Heritage Center
Department of State, Annex 44
301 4th Street, SW.
Washington, DC 20547

February 3, 2013

Dear Members of the Cultural Property Advisory Committee

I have recently completed my PhD in anthropological archaeology at the University of Wisconsin-Madison and have been doing archaeological research in Cambodia since 2005. I support the extension of the *Memorandum of Understanding (MOU) Between the Government of the United States of America and the Government of the Kingdom of Cambodia Concerning the Imposition of Import Restrictions on Khmer Archaeological Material*. The extension of the MOU will provide a basis for continued conservation of the cultural patrimony of Cambodia.

I support the extension of the MOU for several reasons. Firstly, looting and destruction of archaeological sites, especially prehistoric sites, continues to be a problem in Cambodia. Often looting of sites is tied to increased economic development, as sites are discovered during road and building construction and subsequently looted by villagers hoping to profit by selling looted objects. Colleagues in the Ministry of Culture and Fine Arts (MOCFA) and the APSARA Authority have responded to many of these incidents as quickly as possible, but are limited in their response by funding and human resources issues. Another commenter noted the destruction of an archaeological site by a rubber company, but failed to note the follow-up efforts by members of the MOCFA and others to protect the destroyed site and others in the future: <http://www.devata.org/2010/09/cambodian-authorities-rally-to-protect-historical-site/>. Through the efforts of our Cambodian colleagues agencies working in the Memot area must now inform the Ministry of Culture prior to any construction operations and the rubber company has agreed to assist in posting concrete identification signs to prevent future destruction to archaeological sites.

The US can assist and partner in efforts to support Cambodian heritage preservation by **supporting the training of both of Cambodian staff in cultural heritage management, site monitoring, and preventative archaeological excavation and research**. Additionally, the US should also support a **countrywide inventory of archaeological sites**. Both MOCFA and the APSARA Authority have begun GIS databases of archaeological sites across the country and this builds on previous work by the École française d'Extrême-Orient (EFEO), MOCFA, and APSARA. Further collaboration with other partners is needed to develop nationwide archaeological site databases that can be used as management tools. Such inventories would help prevent accidental destruction as seen in Memot. These databases must also be supplemented by **US support for GIS and database training** so that these databases are integrated and actively used by Cambodian colleagues in multiple government agencies.

There are several additional reasons to support the renewal of the Cambodian MOU. The United States is a major market for Cambodian antiquities. Wealthy Americans and museums are able to purchase looted antiquities and such objects are easily accessible online. Of additional concern are smaller or more common objects, such as ceramics and beads, which are also available to US collectors. My dissertation research specifically examined stone and glass beads from multiple Iron Age (approx. 500 BC – AD 500) sites in Cambodia. Many sites I examined in my dissertation had been previously looted, especially for beads, prior to archaeological investigation (e.g. Phum Snay, Prohear, and Bit Meas). In order to acquire just a few pots or a handful of beads a burial must be completely destroyed and widespread looting of burials can quickly devastate an entire Iron Age site. As beads are small and easily transportable they then quickly make it into international markets, including the United States.

However, the trade of these “common objects” does not actually promote cultural understanding. Villagers and middlemen know little about the cultural context of the objects being looted and by the time these objects make their way to the United States all but most of the basic information is lost. In high school and college I worked in two separate bead stores in the United States and have first-hand experience of watching bead sellers bring ancient beads to these stores to sell. In many cases, provenience of objects was made up or beads were listed as coming from one of multiple possible countries and time periods. In 2012, at the Bead and Button Show in Milwaukee, WI, I saw bead sellers selling beads from “the Mekong River region” of Cambodia, but had no other information regarding the date, time period and culture from which these beads came. Loosening the MOU to allow for the buying and selling of “common objects” emphatically does not promote cross-cultural understanding but instead promotes the complete destruction of archaeological sites and causes us to lose valuable information about Cambodia’s past cultural heritage.

Our Cambodian colleagues have worked hard to respond to such looting incidents. Following looting near the site of Angkor Borei in Takeo Province in August 2012, MOCFA officials traveled to the area to stop the looting, refill the holes, and conduct heritage education with local villagers, officials, and students (Heng Sophady, personal communication, Oct 26, 2012). **The US should continue to support efforts for heritage education of local stakeholders.** In conjunction with this would be **funding for short-term targeted field and lab-training programs for our Cambodian colleagues that can help build capacity.** Such training has been begun by small groups of researchers, but further capacity building funded by the US will further strengthen and empower our Cambodian colleagues with skills to address issues related to cultural heritage protection.

Lastly, I wish to emphasize that encouraging import restrictions as outlined in the MOU does not restrict access to collections in Cambodia by archaeologists and art historians, but prevents the trafficking of antiquities. As part of my dissertation research I was granted permission to study glass and stone bead collections by both the MOCFA and the APSARA Authority. Furthermore, I was also granted permission by both organizations to bring dozens of glass and stone beads to the United States for non-destructive compositional analysis. In order to encourage continued research on such collections by both foreign and local researchers, **the US should support the continued improvement of museum infrastructure at the national and provincial level, the restoration of objects, and the building of countrywide museum collection inventories.**

Inventories have been started at several museums, but not finished and funding for these inventories have come from other countries. The US has excellent museum resources and is a position to assist with these efforts. Furthermore, the MOCFA has built several provincial site museums and needs assistance in documenting and preserving collections so the museums can be used to educate local residents about the importance of their cultural heritage and prevent further site destruction.

In closing, I urge that the committee recommend that the United States extend the Memorandum of Understanding. The US government has already taken steps to protect Cambodia's cultural heritage and an extension of this MOU will continue this important work. I appreciate your consideration of this submission.

A handwritten signature in black ink that reads "Alison Carter". The signature is written in a cursive, flowing style.

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