May 13, 2014

Cultural Property Advisory Committee
Docket Number DOS-2014-0008

I am writing to urge adoption of the MOU request from the Government of the Arab Republic of Egypt seeking import restrictions on archaeological and ethnological material.

Looting of Egyptian antiquities has been going on for at least 3000 years. The Mayer Papyri dating later in the reign of Ramesses IX, (12th century BC) describes the trial relating to the looting of the tombs of Ramesses II and Seti I. The actual robbers themselves had died and the account relates to the evidence of the wife and son of one of the robbers. Here the wife claims that her husband robbed the tombs to get money to provide food for the family.

Although the Ministry of Antiquities (formerly Supreme Council of Antiquities) has thousands of employees, many of whom guard ancient sites, there are simply too many sites and too few guards. Although looting occurred, it was held in check. Two factors have greatly increased the threat to Egypt's patrimony. One is the disruption caused by the political changes in the past three years. Because of lack of funding under the strains of the political situation and a break down of police authority, many looters have been emboldened. This destruction falls into two categories. One is simply looting for gain. The other is the encroachment on to archaeological sites by a growing population. For example, in March 2014, residents of neighboring Al-Hagg Qandil village began cultivating the area around a collection of 18th-dynasty noblemen’s tombs at the ancient site of Tel Al-Amarna in the Upper Egyptian city of Minya, which was Egypt's capital during the reign of monotheistic pharaoh Akhenaton. Minya’s archaeological inspectorate sent a report to both local police and the antiquities ministry. The ministry ordered a halt to the encroachment and stepped up security in the area, while tourism and antiquities police were deployed nearby. On the site where I excavate, Tell Timai, a Greco-Roman site dating from the 5th century BC to the 8th century AD, the amount of looting has increased in the past several years. The site is over 200 acres and although the four antiquities guards do a good job, it is a difficult task. Last year several looters were arrested and jailed.

b) The Ministry of Antiquities is dedicated to the preservation of Egypt's patrimony. They have stepped up activities to curtail the antiquities market where items are being marketed. They are stepping up protection at archaeological sites and rapidly respond to any reports of looting. I have personally worked with Egyptian authorities at
my site and they are always very responsive whenever a looting situation occurs. The major problem is that Egypt has so many antiquities and archaeological sites and that the Ministry of Antiquities needs more funding to protect fully their sites. In this time of economic turmoil for Egypt, that is a difficult problem.

The Egyptian government has cooperated with American and foreign excavators for 150 years. The United States has benefited enormously culturally and intellectually through its exploration of Egypt's history and their importance in the history of the world. Egypt now needs our help to preserve their cultural heritage. It is extremely important that we come to their aid through this MOU, which will benefit our relationship with Egypt and with Egyptian American relations, not only for Egyptologists, but for our American population who all study about Egypt and are fascinated with its culture and history.

In addition to the import restrictions (Article 1) of this MoU, a future MoU should be considered that would provide opportunities for additional capacity building programs. These programs could be site security, training programs for management planning, and American aid for site management, conservation and preservation.

Sincerely yours,

Robert J. Littman, M.Litt., Ph.D.
Professor and Chair of Classics
Director, Tell Timai Excavations,
Timai El Amdid Egypt
Trustee, Archaeological Institute of America