

Harvard Art Museums
John Carter Cultural Property Advisory Committee
Cultural Heritage Center
(FCA/P/C), SA-5, Fifth Floor
Department of Art
Washington, DC 20522-05C5

Fogg Museum
Busch-Reisinger Museum
Arthur M. Sackler Museum

May 14 2014

Dear Prof. Gerstenblith and Distinguished Members of the Committee,

I am writing in support of the request from the Government of the Arab Republic of Egypt to the Government of the United States of America for import restrictions on archaeological and ethnological material from Egypt representing its prehistoric through Ottoman heritage. This request is submitted pursuant to 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 as implemented by the Convention on Cultural Property Implementation Act (19 U.S.C. 2601 et seq.).

The restrictions apply to “all artifacts produced during the prehistoric eras through the Ottoman Period, whether they have been discovered as a result of scientific excavation, surreptitious digging or illicit exploration on the ground or underwater. The *Emergency Red List*: <http://icom.museum/resources/red-lists-database/red-list/egypt/>, produced by the International Council of Museums in consultation with officials from the Egyptian government, describes categories or types of objects, archaeological and ethnological, representing this patrimony that are in jeopardy from pillage and illicit trafficking.” as stipulated in the request. This list includes coins.

I am an archaeologist who specialized in coins, a numismatist with particular expertise in ancient Greek coins of ancient Sicily and of the Hellenistic period. I have more than thirty years of experience as curator of Greek coins at The American Numismatic Society and now at the Harvard Art Museums. I have taught courses in numismatics at Columbia University, Bryn Mawr College, now at Harvard University, as well as abroad at the University of Padua and at the École Pratique des Hautes Études, Sorbonne, Paris. I participated in excavations in Avenches, Switzerland, in Eretria and in Cyprus, and I am working on the excavation coins of the American excavations in Samothrace.

The preservation of cultural heritage is essential for the cultural identity and the progress of education in the countries involved. Since the UNESCO Convention of 1970 laws are in place to protect artifacts from leaving their country of origin. Looting and stealing was never legal even during foreign dominion in Greece or Turkey for instance.

I wish to address the inclusion of coins in particular since this is the field I know best. Coins are official documents from the ruling authority of the city or kingdom that issued them. As such, they are invaluable documents of material culture and a primary source of information for the history, religion and art of those cities or rulers. Often the very existence of some cities of kings would not be known if it weren't for the coins. The best examples are the coins of the Bactrian kings. Coins are multiple objects (like terracotta statuettes or lamps, or prints in later times) and through trade often traveled and are

found today far from the mint where they were struck. Cultural property and protection laws apply to **the country where they were found**. Unfortunately illegal trade and looting can sometimes make it very difficult to determine the find spot. Some coinages, like the Athenian “owls” known for the purity of their silver, can be found from Italy to Afghanistan, others, like the coins of South Italy and Sicily are practically never found outside their country of origin. The majority of Cypriot coins as well, as was argued in the 2012 renewal of the MOU, are mainly found in Cyprus. Precious metal coins (silver and gold) were often used to pay mercenaries and could travel further than bronze coins that were mainly used locally.

Egypt had no silver mines on its own territory, as far as we know. In order to secure the supply of precious metal needed for coinage, it decided to operate on a “closed economy system”, it deliberately restricted the circulation of foreign coins into Egypt as well as the export of Egyptian coins outside of Egypt. It did so by striking coins on its own weight standard that had the same face value as the current “international” Attic standard but a reduced intrinsic value, in other words a Ptolemaic tetradrachm weighed less than an Attic tetradrachm but in Egypt had the same purchase value (the difference covered the exchange fee that exists to this day).. Ancient coins until the debasement of currency at the end of 3rd century CE, had **intrinsic** value, i.e. they were worth their weight and fineness of silver. So a merchant would have to pay a high exchange rate fee to use its coins in Egypt but could buy goods at an advantageous price. The consequence for our purpose is that Egyptian coins for good reasons did not really circulate outside Egyptian territories.

Egypt started a regular coinage in all three metals only under the Ptolemies (305 -31 BCE). The major and most prolific mint was Alexandria, though other mints were opened elsewhere in regions under Ptolemaic dominion, such as Cyprus, Phoenicia (modern Lebanon) or Cyrenaica (modern North Africa. Libya). Recent research showed that some bronze coins of Ptolemy I and II may have been struck in Sicily. In order to determine the mint where the coins were struck the knowledge of the find spot and the archaeological context is crucial. Recent excavations of the *Centre d'Études Alexandrines* http://www.cealex.org/sitecealex/navigation/FENETR_NAV_F.htm brought to light many coins that have revised old attributions to mints in Greece and confirmed that in fact they were struck in Alexandria. This is perhaps the strongest argument in favor of the protection of coin finds. Regardless of how common coins are and regardless of their value in today's market, if the context is lost, their historical value is lost.

I have focused my arguments on the ancient Greek coins from Egypt because this is my field of expertise and I can speak more knowledgeably about the specific examples. However my comments can be applied to the abundant Roman provincial coinage in Egypt from the first to the third century CE, as well as to later coinages. I applaud the wording of the request from the Egyptian government to include **all objects from “its prehistoric through Ottoman heritage”**. Chronological limitations to coin finds in previous MOUs (such as coins up to the 3rd century CE and the exclusion of Byzantine or later coins) came across as artificial and forced. Coins are invaluable documents of Egyptian history from their inception just before Alexander the Great in the middle of the 4th century BCE through the Ottoman period.

Egypt has implemented many regulations and established authorities to protect its cultural patrimony and has also developed programs of public awareness and education, as stated in Egypt's request. One would wish that for objects like coins a system similar to the Portable Antiquities & Treasure in the UK be established; a system that gives incentives to the finder to report finds and also allows the

government to distribute some of the multiple finds like coins among different institutions and even to a legal trade.

As I have stated in my support of the inclusion of coins in the MOU with Cyprus, my arguments and position are **not against collecting or trading coins**: museums and scholars have always benefited from the collaboration and knowledge of collectors and dealers, most of whom are ethical and respect the law. The restrictions and MOUs pertain to illegal activities, looting and theft.

I remain available for further information or to answer any questions.

Yours sincerely,

A handwritten signature in blue ink, reading "Carmen Arnold-Biucchi". The signature is written in a cursive style with a long horizontal flourish at the beginning.

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