

AMERICAN
NUMISMATIC
SOCIETY

Cultural Heritage Center (ECA/P/C) SA-5, Floor C2
U.S. Department of State
2200 C Street NW
Washington, D.C. 20522-05C2

January 7, 2020

Dear Members of the Cultural Property Advisory Committee:



I am writing in support of the request of the Republic of Turkey for a Memorandum of Understanding regarding import restrictions of archaeological and ethnological materials. The views expressed in this letter are my own and are not meant to be representative of the American Numismatic Society. I hold a DPhil from Oxford University in Classics, and I have worked at the British Museum and the American Numismatic Society for almost 30 years. I am a specialist in the field of numismatics, in particular ancient coinage, in which I have published extensively. As editor of *Coin Hoards* since 1991, I am particularly familiar with hoards of ancient Greek coins, including those passing through the antiquities trade. As a specialist of early electrum coinage, I have worked with archaeologists on Turkish sites. In 2019, I received a permit from the Turkish Ministry of Culture to work on the Archaic and Classical coins held in the Museum in Miletus (Balat) and to prepare a full publication. I also assist law enforcement as a member of the Ancient Coins Work Group of the Anti-Counterfeiting Educational Foundation.

I can personally attest to the significant loss of cultural heritage that I witnessed during visits of various sites over the last few years. I have seen significant activity of looting in sites along the Turkish coast, which has been confirmed by archaeologists working in the field. Although it is hard to know what exactly is being dug up by looters, it is certain that coins play a significant role, which is clear from online auctions, eBay or Amazon where looted coins from Turkey are offered by the thousands on any given day.

The large number of coins on the market in the US and abroad is not surprising. Among over 1,000 geographical entities, mainly cities, which minted coins between 640/30 BCE - 296/7 CE, 450 of those 1000 mints are located in Turkey. To put it differently, no other country in the Mediterranean has more ancient sites than Turkey. While it is sometimes argued that coins circulated widely and are not restricted to the region where they were minted, for many of the coins minted in the boundaries of Turkey, this is not true. Silver fractions and local bronze coins of mints in Turkey circulate largely in the regions where they were minted in the first place.

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The frequently repeated argument that larger denominations such as tetradrachms do not circulate locally is simply wrong, at least far too simplistic: Athenian tetradrachms are found in Attica and the rest of Greece in huge quantities and should have been included in the MOU for Greece (see as a random example the hoards listed in IGCH 14, 16, 125, 128, 134, 135, 138, 141, 144, 146, 150, 155; more could be easily added). Athenian tetradrachms are however also found in Turkey in enormous numbers, as the Elmalı Hoard (1982) and the so-called Karkemish Hoard (early 1990s) vividly illustrate. In these hoards of the fifth century BCE, local coinages of many regions (today in Turkey) were mixed with Athenian tetradrachms and decadrachms. I am aware of another massive hoard of the 5th century BCE, which is rumored to have had 20-30,000 tetradrachms. So Athenian tetradrachms and other trade coinages are definitely part of the heritage of Turkey as well as of course many other countries. Without recording such important hoards in their context, we are unable to fully understand when and why these coins were made.



Looking at the very beginning of coinage, it is hard to argue that early electrum coins (before 550 BCE) circulate much outside Turkey. A small number of coins have been found on the Greek islands such as Samos, but actual numbers are small in comparison to finds reported from mainland Turkey. In an ongoing study of early electrum coins (coins minted by uncertain mints, before c. 480 BCE), colleagues and I are trying to record every known electrum coin in a database. Based on this data, I currently estimate that prior to the year 2000, around 5000 individual coins were known, which have entered collections or are recorded in auctions beginning the 18th century onwards. Other records of coins, largely from auctions *after* 2000 have produced at least 6000 new pieces, which have no prior provenance and appear all looted, in all likelihood from Turkey. These numbers show the scale of unprovenanced material entering the market in the last two decades.

It is often argued by members of the dealer community that coins are objects produced in multiples and thus not worth the same protection that Greek sculpture or other “unique” objects deserve. This sort of argument shows a complete lack of understanding of numismatic methodology, where even enormous quantities of virtually identical coins have enormous value for numismatic scholarship. In my own area of research of early electrum coinage, the complete lack of find provenance of most coins means that attributions to regions or mint will always be guesswork: the few properly excavated early electrum coins in Turkish sites such as Ephesos, Gordion, or Sardis provide the key dates for our knowledge about the invention of coinage. The lack of any find data for the majority of such coins means that our knowledge of the beginning of coinage will always be limited.

I feel particularly strongly about this MOU request since I have witnessed that Turkey has long made major efforts to protect and publish its cultural heritage. Few countries

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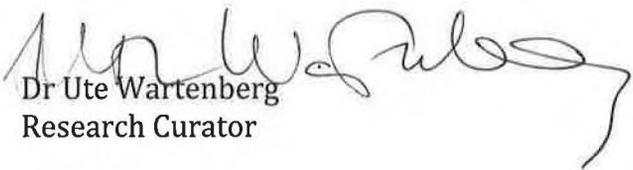
have so many archaeological sites or museums. For the field of numismatics, Turkey has some exemplary displays in museums. In fact, even minor museums have displays of local coin finds. During my work in the Milet Museum, I have witnessed first-hand that museums will buy from local finders coins and other finds (in fact, I have been told by staff that they are required to buy, store and register such coins). In the case of Milet, over 20,000 coins of all periods are now in the collection, all of which have been assigned inventory numbers, descriptions and photographs. It is a little-known fact that Turkish museums acquire finds from locals in a system, which is not totally different from the much-praised British Portable Antiquities scheme. I have also been told that a centralized database system for all Turkish museum is underway. For coins, the publication of public and private coin collections is exemplary: eleven volumes, with more in preparation, have appeared in the Sylloge Numorum Graecorum Turkey series, and other collections of museums have been published. There is obviously a lot more work to be done, but Turkey is allowing US scholars access to their collections or encourage publications.



By restricting the import of newly found coins from Turkey, coins which cannot be shown to have any older provenance, collectors in the US are in fact protected from purchasing looted material. Far from restricting collecting, MOUs and other regulations make the market more transparent for collectors. There are more than enough ancient Greek and other coins with a provenance to allow collectors to pursue their hobby and love of history.

I am most grateful for your attention on this important matter.

Yours truly,


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