

## APPENDIX

### 1. First principles: what the art market considers to be antiquities

This document takes antiquities as meaning artefacts from ancient civilisations surrounding the Mediterranean basin, including the Classical civilisations of Ancient Greece and Rome, the ancient civilisations of the Arabian Peninsula, North African cultures and those of Eastern, Western and Northern Europe. This trade accounts for less than 0.5% of the global art market, with Middle Eastern antiquities – the focus of terrorism financing claims – accounting for less than 0.05%.

It should be noted that while ancient artefacts from other cultures around the world are often referred to as antiquities by campaigners, within the confines of the art market they are treated as separate categories under headings such as Pre-Columbian Art, Native American Art, Asian Art (encapsulating Chinese, Japanese, Korean, Cambodian, Indian and Afghan ancient art), and others.

### 2. Geraldine Norman, *Great Sale of the Centuries*, The Independent, November 24, 1990

Geraldine Norman previews a unique auction of Greek and Roman antiquities

## Great sale of the centuries

SOME of the finest Greek and Roman antiquities ever seen on the auction market will be offered for sale at New York's Park Lane Hotel next Tuesday.

They are coming to auction, rather than being sold privately to great museums or great collectors, because of the dissolution of a partnership between Jonathan Rosen, a New York real estate tycoon, and Robert Hecht, antiquities dealer extraordinary. They have to untie joint ownership deals as they close the New York gallery, Atlantis, which they have run for the last four years.

The most remarkable offering is a complete column krater, or vase, nearly two foot high, painted with a ferocious battle between the Greeks and the Amazons. Their armour and accoutrements are lovingly delineated while blood spurts from the dying. It is the work of one of the greatest vase painters, known as the Pan painter, and dates from 470-460 BC. A price around \$600,000 to \$700,000 is looked for.

Other highlights include a Roman marble of Menelaos holding the body of his dead companion Patroklos. It is a copy of a Greek sculpture greatly admired in antiquity – at least 12 Roman copies survive. The seventeenth-century sculptor Gianlorenzo Bernini considered the copy that he knew in Rome to be the most beautiful sculpture that had survived from antiquity. Tuesday's example is estimated at \$250,000 to \$275,000.

There are plenty of wonderful lesser works in the two session sale, such as the Roman mosaic depicting a comic mask wreathed in flowers and berries (\$75,000 to \$85,000). The catalogue notes that it can be compared to the best mosaics from Pompeii in the Naples museum. Then there is a Roman silver eating kit; constructed like a penknife, it includes a knife, fork, two spoons and a toothpick (\$10,000 to \$12,000). Hecht bought it at Christie's in 1986 when it was described as unique; his catalogue points out that

Christie's had missed the report of a similar one found in Bulgaria.

It is the second time this year that Hecht's taste has come under the hammer and it is transforming the market. He provided most of the antiquities collection put together by Bunker Hunt and his brother William – the billionaires who tried to corner the silver market – which was auctioned at Sotheby's last summer for a record-breaking \$11m.

The sale was a landmark because of the superb quality of the objects. Fragmentary remains of a vase signed by Euphronios were bid to \$1.76m while a Roman bronze portrait head of around the first century made \$577,500. Sotheby's had estimated a fraction of these prices – they are not used to handling such material.

That is one reason Tuesday's auction has not gone their way. "They weren't prepared to estimate our material at its true value – we also wanted a higher standard of cataloguing," says Rosen. So he set up his own auction company for the occasion – the catalogue is a scholarly masterpiece and the estimates mind boggling.

Hesperia Arts Auction Ltd is

*Eighty per cent of all antiquities that come on the market have been illegally excavated and smuggled*

jointly owned by Rosen and California's most colourful antiquities dealer, Bruce McNall. He makes movies, trains racehorses – he won the Arc de Triomphe this year – and owns an ice hockey team, the LA Kings. It was he who persuaded the Hunt brothers to collect antiquities, bringing in Hecht as an advisor. Hesperia has taken in some material from other dealers, but most of the treasures on offer are owned in elaborate partnership deals between Rosen, McNall, Hecht and an investment fund called Athena II run by Merrill Lynch.

Museums, rich collectors and other dealers will, no doubt, be



Smile please: a first-century Roman mosaic depicting a comic mask

lining up to bid – antiquities are currently high fashion, especially in America. The fashion conveniently ignores the fact that 80 per cent of all antiquities coming on to the market have been illegally excavated and smuggled from their countries of origin. The treasures in Hesperia's sale are not likely to be exceptions to the rule.

The marvellous remains of the Greek and Roman civilisations – bronzes, marble sculptures, exqui-

and stress that trade in smuggled objects is legal once they have left their country of origin. These arguments ease their consciences.

As a result, smuggled antiquities fill the galleries of Madison Avenue and Mayfair, not to mention Sotheby's and Christie's auctions. But the very best usually end up in the hands of Robert Hecht, a scholar with a real passion for the material he handles.

Posters plastered around Paris this autumn, advertising an exhibition of the Greek vase painter Euphronios at the Louvre, provided a reminder of one of his greatest coups. The Louvre had a picture of a vase on their poster painted with the death of Sarpedon which Hecht sold to the Metropolitan Museum in New York in 1972 for \$1m – a price level which at the time had only been achieved by one or two Impressionist paintings. The vase bears the signature of both Euphronios and the potter Euxitheos.

All hell broke loose after the Metropolitan's purchase. The Italian government claimed that the vase had been found at Cerveteri and smuggled to America. But no proof was forthcoming and it remains at the Met, accepted as one of the greatest painted vases to have survived from antiquity – and worthy of loan to the Louvre.

### 3. UNESCO \$10 billion claim<sup>[30]</sup>

UNESCO launched its 50th anniversary celebrations by claiming that the illicit trade in cultural property is estimated to be worth nearly \$10 billion a year. However, initially it gave no source for this claim, but this did not stop it from expanding on the theme as follows in an article online: “As shown by *The Real Price of Art* campaign, in some cases, the looting of archaeological sites, which fuels this traffic, is highly organized and constitutes a major source of financing for criminal and terrorist organizations.”

When asked where the figure came from, UNESCO’s official spokesperson forwarded a copy of the French version of the 2018 Joint European Commission-UNESCO Project report, *Engaging the European Art Market in the fight against the illicit trafficking of cultural property*, by Professor Marc-André Renold<sup>[31]</sup> with the message that the evidence was in section C. However, it wasn’t. UNESCO was notified of the error immediately but failed to correct it.

The Renold study doesn’t mention a \$10 billion figure anywhere. Instead, it quotes an estimated figure of \$6 billion to \$8 billion from page 50 of the 2011 study by Frank Wehringer listed in the footnotes. However, Wehringer did not give it as his estimate but as a figure “regularly given” without providing any real source for it. He also said that “according to widespread statements, [this] makes it the third largest illegal market after drugs and weapons (according to estimates by UNESCO and FBI according to Anton 2010a: 2)”. In other words, this is yet another example of inaccurate claims dating back years being “filtered” through official lines to emerge as “data” and “evidence” when it is nothing of the sort. In this case it is clearly based on other inaccuracies already detailed above.

Professor Renold publicly denied being the source of the \$10 billion claim<sup>[32]</sup>, and UNESCO were informed of the error, but continued to ignore it and publish the inaccurate \$10 billion figure.

Finally, when challenged by email in April 2022, Assistant-Director General of UNESCO (Culture) Ernesto Ottone Ramirez admitted that they had no idea what the true figure for cultural property trafficking was and would no longer quote figures. The UNESCO website was updated the following day, but the \$10 billion figure is still being quoted by campaigners and the media.

### 4. European Commission Fact Sheet: Published July 13, 2017<sup>[33]</sup>

This document, entitled ***Questions and Answers on the illegal import of cultural goods used to finance terrorism***, sets out the evidence that persuaded the European Commission to proceed with the import licensing regulations for cultural property which were formally introduced in 2019.

Under the heading *What is the value of the cultural goods that are imported illegally to the EU?* it explains the following:

The value of the illegal trade in cultural goods is difficult to assess, since it is a criminal activity. Reliable data and instruments for measuring illicit commerce are scarce. **According to Interpol**, however, the black market in works of art is becoming as lucrative as those for drugs, weapons and counterfeit goods. Some estimates suggest that in 80-90% of sales of antiquities, the goods have illicit origins. Another study suggests that the total financial

value of the illegal antiquities and art trade is larger than any other area of international crime except arms trafficking and narcotics and has been estimated at €2.5 - €5 billion yearly.

**UNESCO<sup>[34]</sup> has also stated that**, together with the drugs and armaments trades, the black market in antiquities and culture constitutes one of the most firmly rooted illicit trades in the world.

**5. UNESCO: *The fight against the illicit trafficking of cultural objects. The 1970 Convention: Past and Future.* 2011.**

Created by the Italian journalist Fabio Isman, the information kit for this report remains on the UNESCO website<sup>29</sup> and is the given source for the claim regarding antiquities, drugs and armaments cited by the European Commission Fact Sheet.

On page 2, the UNESCO report states: “The illicit trafficking of antiquities is estimated to be superior to US\$6 billion per 1 year according to research conducted by the United Kingdom’s House of Commons on July 2000.” This turns out to be a reference to the ***House of Commons Culture Select Committee Seventh Report into crime associated with cultural property*<sup>[35]</sup>**.

It includes *Chapter II The problem of illicit trade, The nature and scale of illicit trade* paragraph 9, which reads:

“The scale of the illicit trade taken is said to be very considerable. According to the Museums Association, ‘as an underground, secretive activity, it is impossible to attach a firm financial value to the illicit trade in cultural material. Estimates of its worldwide extent vary from £150 million up to £2 billion per year.’ **[21]** Detective Chief Superintendent John Coles of the Metropolitan Police Service identified a similar range of estimates—from \$300 million to \$6 billion. **[22]** The European Association of Archaeologists attributed to Interpol an estimate that the worldwide trade in cultural property was worth about \$4.5 billion annually, compared with about \$1 billion ten years ago. **[23]**” **As noted, Interpol has stated that it has never had any such figures.**

**As can be seen from the above paragraph, the House of Commons report includes the following footnotes, which give the detailed primary sources of evidence as presented in session before the Culture Select Committee.**

**They are as follows:**

- **Footnote 21:** Regarding the \$300 million to \$6 billion valuation<sup>[36]</sup>.

“(Detective Chief Superintendent Coles of the Met Police) I anticipated a question along these lines before I came here. I conducted some research, going back over 10 years, to try and find out where figures that have been bandied around about this subject emanated from. One of the figures is **\$3 billion**. I have found reports going back 10 years where there is an estimate as high as **\$6 billion**. At the other extreme of the scale the suggestion is that it could be as low as **\$300 million**. In order to try and put some definitive figure upon this scale, my colleague, Miss Stevenson, has conducted some research in the last few days, and it might be better if she explained her research to you.”

“(Detective Constable Stevenson) I think what we have to actually state from the start is that the cases are really anecdotal. There are no statistics kept. We have to bear in mind that the whole trade, whether illicit or legal, actually encompasses jewellery, works of art and antiquities, and as there is no actual Home Office information that is kept we have had to turn to the insurance companies and the insurance industry to get the figures we have.

A loss adjuster I spoke to estimated that this trade is costing the public between **£300-£500 million** per year in the United Kingdom alone. I can break that down to where he got those figures from. **The Association of British Insurers on average record losses by theft in both domestic and commercial as being somewhere in the region of about £600 million per year. Out of that figure they assume that roughly half relates to domestic theft. So, leaving aside your office break-ins or something like that and computer thefts, they would say that approximately £300 million goes on domestic burglaries, and out of the domestic thefts, roughly, in the settlement, two thirds of the items in that category are jewellery, silver, collectibles and fine art. That accounts for the first £200 million of insured losses.**

“Secondly, they state that Lloyds is excluded from the total and, of course, the majority of very high value fine art and antiques are insured through Lloyds. **We do know that worldwide Lloyds pay out in the region of about £100 million into the fine art and jewellery category. So, it is possible to estimate that between 40 and 50 per cent of that is attributable to the United Kingdom. That takes the figure to roughly £250 million.** Then they looked at the area of uninsured loss, which is extremely difficult to estimate. This would include properties such as National Trust properties, English Heritage and churches, but they reckon that is somewhere in the region of £75 million per annum. Then there are those losses which go entirely unreported, which, of course, you can only guess at, but they arrive somewhere in the region of £300, £400 or £500 million per year.”

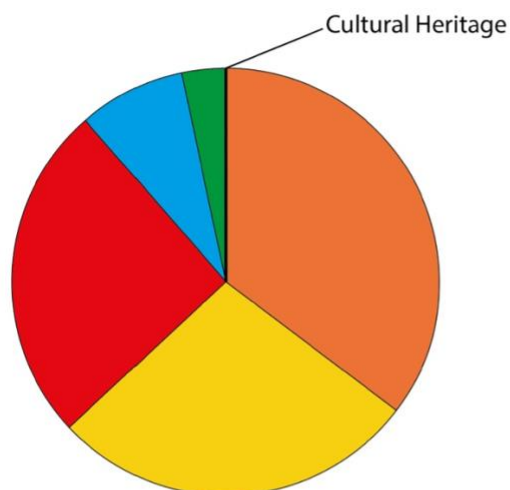
- **Footnote 22:** The Museums Association. See paragraph 5: This talks about “cultural material”, i.e. all art and antiques, not antiquities, gives a range of figures from £150 million to £2 billion a year and attributes it to Geraldine Norman’s *Independent* article from November 24, 1990, which shows no such figures, leading to the conclusion that they have actually taken this from the Brodie, Doole and Watson report *Stealing History*, 2000, without checking the primary source.<sup>[37]</sup>
- **Footnote 23:** The European Association of Archaeologists attributed to Interpol: \$4.5 billion. Evidence p 264<sup>[38]</sup>. The text reads: “As the illicit trade is largely clandestine it is not open to systematic quantification and estimates of total value are usually extrapolations from what few official statistics are available. Interpol suggests that the illicit trade in cultural property is third only in value to drugs and arms, and is worth about \$4.5 billion annually, compared to about \$1 billion 10 years ago. This increase is thought to be due to the emergence of a large European black market (Kouroupas 1996: 11, 1998: 4).”

**Note the reference to Kouroupas<sup>[39]</sup>.** This is Maria Papageorge Kouroupas, then executive director of the Cultural Property Advisory Committee, administered by the United States Information Agency. As indicated, she attributed to Interpol the \$4.5 billion figure and the claim that illicit trade in cultural property was only third in value to that in drugs and weapons. **However, Interpol has said that it has never had any such figures and does not support such claims.**



**6. World Customs Organisation Illicit Trade Report 2019: Pie charts based on the WCO figures showing the relative share of seizures and cases being investigated by risk category, as reported via the Customs Enforcement Network.**

Share of cases by risk category

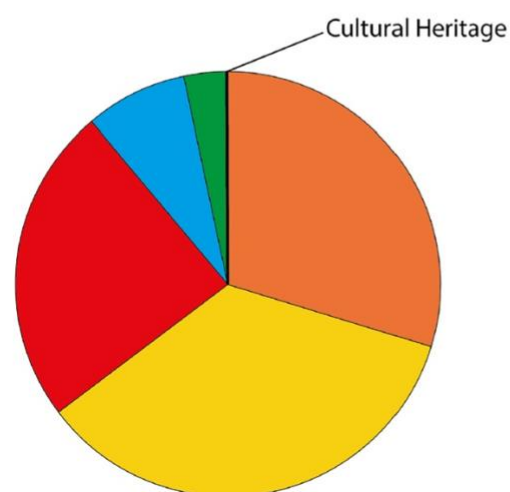


**Number of cases**

Total:	102,214
Drugs:	36,264 (35.48%)
IPR + H&S:	28,203 (27.59%)
Revenue:	26,285 (26.72%)
Security:	8,190 (8.01%)
Environment:	3,045 (2.98%)
Cultural Heritage:	227 (0.22%)

Drugs	—
IPR + H&S	—
Revenue	—
Security	—
Environment	—
Cultural Heritage	—

Share of seizures by risk category



**Number of seizures**

Total:	133,453
Drugs:	40,017 (29.98%)
IPR + H&S:	46,386 (34.76%)
Revenue:	32,426 (24.30%)
Security:	10,469 (7.84%)
Environment:	3,884 (2.91%)
Cultural Heritage:	271 (0.20%)

**Statistical sources in the WCO report 2019**

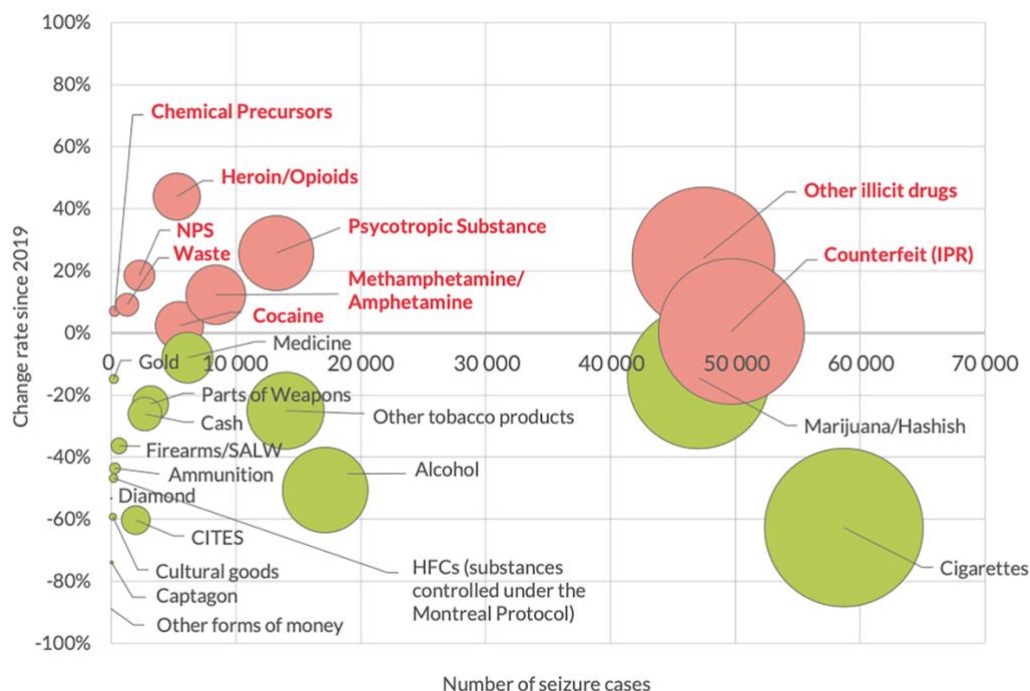
See <http://www.wcoomd.org/en/media/newsroom/2020/july/the-wco-issues-its-2019-illicit-trade-report.aspx>

- Cultural Heritage: page 11
- Drugs: page 37 & 40
- Environment (Fauna, Flora & Waste): page 95

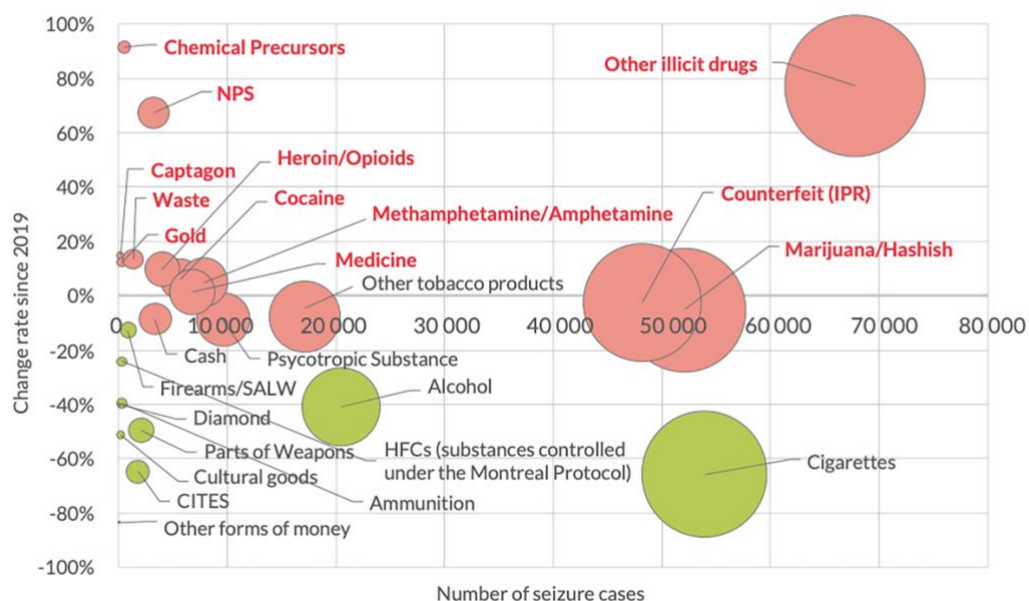
- IPR and H&S (Counterfeit and Medical goods): page 121
- Revenue (Tobacco & Alcohol): page 151 & 171
- Security (Weapons & Ammunition): page 185

7. World Customs Organisation Illicit Trade Report 2021: WCO Graphs showing the relative share of seizures and cases being investigated by risk category, as well as changes in the number of cases and seizure volumes from 2019 to 2021 as reported via the Customs Enforcement Network. IMAGES COURTESY OF THE WCO

**Figure 3. Seizure cases in 2020 and its change rate since 2019**  
(WCO Survey & Published Reports)



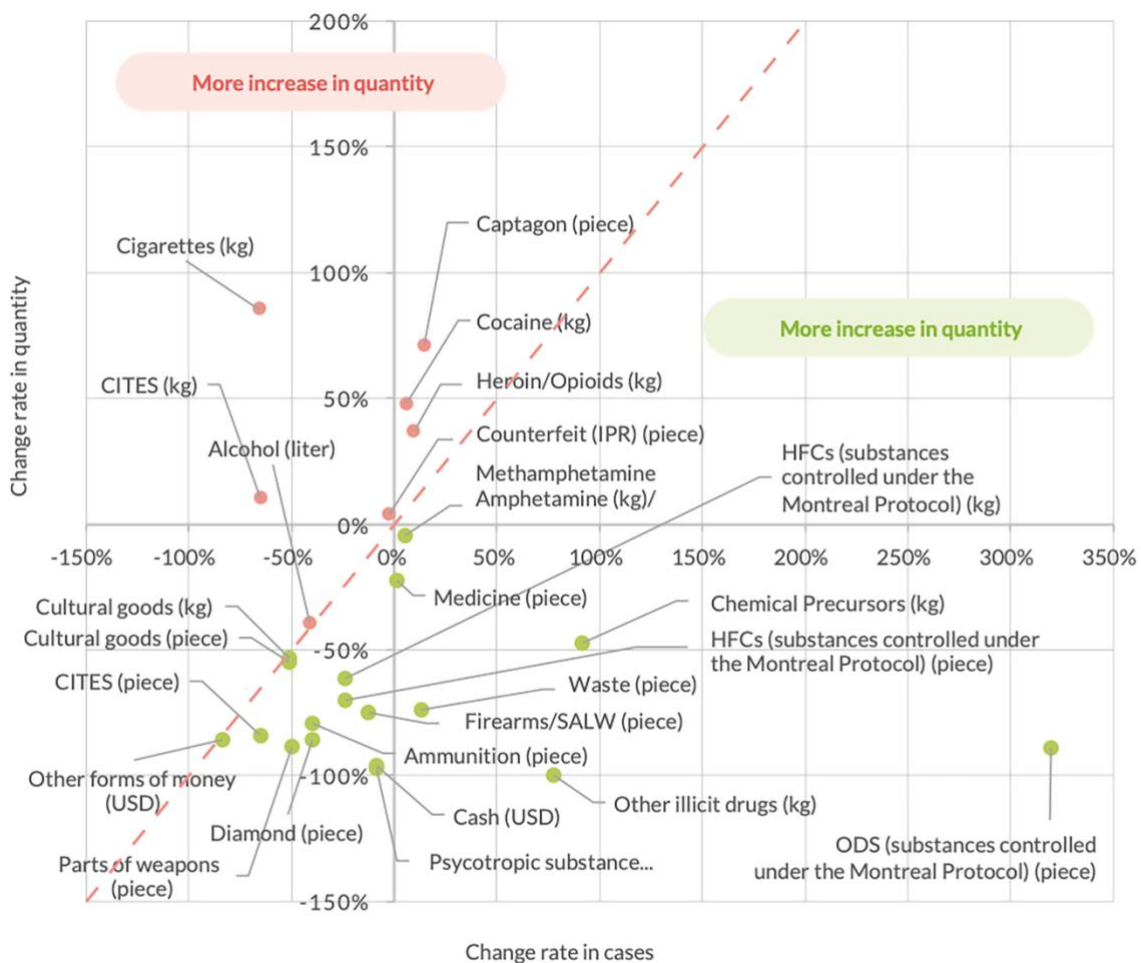
**Figure 4. Seizure cases in 2021 and its change rate since 2019**  
(WCO Survey & Published Reports)



**Figure 5.** Percentage change in the number of cases since 2019

COMMODITY	2020	2021
Cocaine	2%	6%
Psychotropic Substances	<b>26%</b>	-9%
NPS	<b>19%</b>	<b>68%</b>
Marijuana/Hashish	-14%	-5%
Methamphetamine/Amphetamine	<b>12%</b>	5%
Heroin/Opioids	<b>44%</b>	10%
Chemical Precursors	7%	<b>91%</b>
Other illicit drugs	<b>24%</b>	<b>77%</b>
Captagon	-74%	<b>15%</b>
Counterfeit (IPR)	1%	-2%
Medicine	-8%	1%
Cigarettes	-63%	-66%
Other tobacco products	-25%	-8%
Alcohol	-51%	-41%
Firearms/SALW	-36%	-13%
Ammunition	-44%	-40%
Parts of Weapons	-23%	-50%
Cultural goods	-59%	-51%
Cash	-26%	-9%
Gold	-15%	<b>12%</b>
Diamond	-53%	-40%
Other forms of money	-89%	-83%
CITES	-60%	-65%
ODS (substances controlled under the Montreal Protocol)	<b>230%</b>	<b>320%</b>
HFCs (substances controlled under the Montreal Protocol)	-47%	-24%
Waste	9%	<b>13%</b>

**Figure 7.** Change rate in cases vs. quantity from 2019 to 2021



**W.C.O.** Figure 7 shows that the number of cultural property items seized fell by 50% from 2019 to 2021. As the WCO noted that a total of 271 seizures took place in 2019, a decline of 51% since then would mean a total of 138 globally reported through the Customs Enforcement Network in 2021. The WCO reported a total of 9,399 items seized in 2019. A decline of 50%, as reported in 2021, means that in that year a total of 4,700 items globally were reported as seized through the Customs Enforcement Network. In 2018, that figure had been 22,462, so the decline in items seized from 2018-2021 was 80%. **It is important to remember that those 4,700 items cover all 13 categories of cultural property, including household items, sound film and photographic archives and musical instruments, as well as statues, works of art and other goods.**



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## Footnotes

[30] UNESCO, *The Real Price of art: International UNESCO campaign reveals the hidden face of art trafficking: How much for the soul of a nation?* <https://www.unesco.org/en/articles/real-price-art-international-unesco-campaign-reveals-hidden-face-art-trafficking>

[31] Professor Marc-André Renold, *The legal and illegal trade in cultural property to and throughout Europe: facts, findings and legal analysis*. A joint European Commission-UNESCO Project, February 2018 [https://www.art-law.org/files/1915/9342/2620/UNESCO\\_Report\\_-\\_SUBMITTED\\_27.02.2018.pdf](https://www.art-law.org/files/1915/9342/2620/UNESCO_Report_-_SUBMITTED_27.02.2018.pdf)

[32] Vincent Noce, *Unesco, stop citing 'bogus' \$10bn figure, art trade pleads*, The Art Newspaper, November 12, 2020 <https://www.theartnewspaper.com/news/unesco-bogus-figure>

[33] The European Commission, *Questions and Answers on the illegal import of cultural goods used to finance terrorism*, July 13, 2017: See *What is the value of the cultural goods that are imported illegally to the EU?* [https://ec.europa.eu/commission/presscorner/detail/en/MEMO\\_17\\_1954](https://ec.europa.eu/commission/presscorner/detail/en/MEMO_17_1954)

[34] UNESCO, *The Fight against the Illicit Traffic of Cultural Objects: The 1970 Convention: Past and Future*, Information Kit, 2011 (see page 2) [https://unesdoc.unesco.org/ark:/48223/pf0000227215\\_eng](https://unesdoc.unesco.org/ark:/48223/pf0000227215_eng)

[35] Select Committee on Culture, Media and Sport, Seventh Report, II *The problem of illicit trade: The nature and scale of illicit trade*, Hansard, (UK parliamentary official record), prepared July 25, 2000: <https://publications.parliament.uk/pa/cm199900/cmselect/cmcmums/371/37104.htm>

[36] Select Committee on Culture, Media and Sport, Seventh Report, II *The problem of illicit trade: The nature and scale of illicit trade*, Hansard (UK parliamentary official record), Examination of witnesses (Questions 475-479), May 23 2000: <https://publications.parliament.uk/pa/cm199900/cmselect/cmcmums/371/0052305.htm>

[37] Select Committee on Culture, Media and Sport, Seventh Report, II *The problem of illicit trade: The nature and scale of illicit trade*, Hansard (UK parliamentary official record), Memorandum submitted by the Museums Association in March 2000, *The illicit trade: The nature of the trade*, paragraph 5: <https://publications.parliament.uk/pa/cm199900/cmselect/cmcmums/371/0032305.htm>

[38] Select Committee on Culture, Media and Sport, Seventh Report, II *The problem of illicit trade: The nature and scale of illicit trade*, Hansard (UK parliamentary official record), Memorandum submitted by the European Association of Archaeologists, *The illicit trade: The nature of the trade*, Appendix 11, March 2000, see under *Scale*: <https://publications.parliament.uk/pa/cm199900/cmselect/cmcmums/371/371ap12.htm>

[39] Maria Papageorge Kouroupas, *Illicit trade in cultural objects*, The Getty Conservation Institute, 1998 (See second paragraph) [https://www.getty.edu/conservation/publications\\_resources/newsletters/13\\_1/feature1.html](https://www.getty.edu/conservation/publications_resources/newsletters/13_1/feature1.html)