

May 12, 2025

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

Dear Members of the Cultural Property Advisory Committee:

I am submitting this letter as an archaeologist and as a member of the Society for American Archaeology. I write to communicate my continued support to the Government of the Republic of Costa Rica for Imposing Import Restrictions to Protect its Cultural Patrimony under Article 9 of the UNESCO Convention and the Convention on Cultural Property Implementation Act.

As an archaeologist, I became interested in Costa Rica because of its rare phylogenetic qualities. The current linguistic and genetic evidence suggests that Chibchan-speaking indigenous peoples diverged from a common ancestral population over the Holocene, without significant migrations from outside, leading ultimately to a diverse array of societies that might be contrasted to understand the factors associated with their divergence. There are only a handful of areas that present these advantages in the world. As such, Costa Rica presents rare and unusual qualities of interest to archaeology and anthropology, and it is thus important to advocate for its heritage. Please allow me to revisit each of the three relevant statutory determinations and offer updates.

The first determination requires that we evaluate if the cultural patrimony of Costa Rica continues to be jeopardized by the pillage of archaeological materials. This remains the case. Looting remains a persistent problem in Costa Rica. The *Museo Nacional de Costa Rica* was made aware of illicit activities between 2021 and 2024. Its staff issued 13 referrals to the police (*denuncias*) for looting, and another four for the vandalism of archaeological sites. This is likely just a fraction of the larger problem. Museum staff continue to encounter freshly looted sites in multiple provinces, typically those with above-ground indications of buried tombs. This is, sadly, how many sites are first documented and included in the national register.

The second determination requires that Costa Rica has taken measures consistent with the UNESCO Convention to protect its cultural patrimony. The *Comisión Arqueológica Nacional* and the *Museo Nacional de Costa Rica* are the two institutions that I have worked most directly with. Each is involved with the permitting, oversight, and reporting of archaeological projects- whether these are carried out by foreign archaeology teams or nationals. For example, the *Comisión Arqueológica Nacional* is designed to protect national patrimony (in coordination with the *Patrimonio Histórico del Ministerio de Cultura* and the *Comisión Nacional de Asuntos Indígenas*) and exists to authorize and supervise archaeological projects that meet several methodological and reporting standards. The *Museo Nacional* continues to serve as the repository of archaeological materials and reports, an antiquities watchdog,

and is frequently involved in public education and outreach efforts. The reporting expectations of the two institutions provide the oversight consistent with the expectations of the UNESCO Convention. Additionally, the Gold and Jade Museums in the capital of San José (along with a variety of smaller museums) further extend the public education mission.

The final relevant determination is whether import restrictions are consistent with the interests of the international community. As a foreign-born archaeologist, am well-positioned to comment on this aspect. I can attest to the positive reception of the Costa Rican government to the realization of international collaborations. This is accurate of both the *Comisión Arqueológica Nacional* and *Museo Nacional de Costa Rica*, but also of the *Universidad de Costa Rica* who finalized a Memorandum of Understanding with my College to permit closer collaborations between Costa Rica and the international community. I have now directed three projects in Costa Rica and, in each case, me and other foreign-born investigators have been warmly received by Costa Rican institutions, and the international collaborations that have emerged from these partnerships continue to be enlightening and productive.

For the reasons outlined above, I am grateful for the opportunity to offer my strongest possible recommendation to support the continued request by the Government of the Republic of Costa Rica to impose import restrictions and protect its cultural patrimony. This protection will help to aid archaeological inquiry, enrich scholarly collaborations, and help us to better appreciate our shared humanity.

Sincerely,

A handwritten signature in black ink, reading "Scott Palumbo". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Dr. Scott Palumbo
Professor of Anthropology
College of Lake County
Grayslake, IL 60030