

Sarah M. Rowe, PhD
Department of Anthropology
1201 W. University Drive
Edinburg, Texas 78539
Tel: (956) 665-3567
sarah.rowe@utrgv.edu

May 28, 2024

Cultural Property Advisory Committee
U.S. Department of State
2200 C Street, N.W.
Washington, D.C. 202522

On behalf of myself and the Society for American Archaeology, I am writing to urge the Committee to recommend that the United States should renew the existing cultural property import restriction agreement with Ecuador.

I submit these comments in my personal capacity. I am Associate Professor of Anthropology and Coordinator of the Public Heritage & Community Engagement program at The University of Texas Rio Grande Valley. I have conducted research in Ecuador since 2002 and held archaeological research permits beginning in 2006. I specialize in the archaeological cultures of the coast, including the Valdivia and Manteño traditions. I am a Fulbright Scholar (2017-2018) and Director of the Proyecto Arqueológico de los Ríos Culebra-Colín (PARCC), a collaborative archaeology project conducted with the *comuna* Dos Mangas, whom I have worked with since 2006. Since 2018 this project has included an archaeological field school component, training 42 students from the United States, Ecuador, France, Canada, Mexico, and Colombia in archaeological methods and Ecuador's past.

(I) Is the cultural patrimony of Ecuador still under threat from looting and pillaging?

Ecuador's archaeological record is unfortunately still under threat from looting, both casual and professional. Casual looting is the occasional theft, usually of small, portable objects, by tourists and Ecuadorians as they run across them. Professional looting is organized theft on a larger scale. While casual looters may keep the objects for themselves, they can also resell them. Professional looters are deliberately out to make a profit from their theft. There is a history in Ecuador that legitimized both casual and professional looting; in the 1980s the director of the Banco Central Museum, Dr. Olaf Holm, regularly accepted looted materials into the museum collection. While this no longer reflects contemporary museum practice in Ecuador, there is a generation of Ecuadorians who saw looting as normalized practice.

Several circumstances make looting an ongoing problem. First, population growth and development, much of it *ad hoc*, means that building and farming activities frequently uncover archaeological material, including portable objects such as figurines, spindle whorls, and pottery. Despite an expansive archaeological survey undertaken around 2010, many sites lack above-ground architecture or landscape modification and are therefore still unknown. Educational initiatives spearheaded by the *Instituto Nacional de Patrimonio Cultural* mean that concerned citizens will sometimes call archaeologists in to examine finds, but this is by no

Department of Anthropology

ELABN 344
1201 W. University Drive
Edinburg, Texas 78539
(956) 665-3321

means a universal response. INPC staffing limitations mean that this engagement is reactive rather than proactive, happening only once destruction and the opportunity for looting has occurred.

Additionally, within the context of Ecuador's increased gang violence tied to the international drug trade we may unfortunately see an increase in looting, as antiquities trafficking is frequently tied to drug trafficking. In early 2020 I responded to a request from Homeland Security to provide my opinion on likely looted artifacts found with someone crossing the US-Mexico border. This eventually led to visiting the home of the suspected antiquities trafficker here in Texas to provide assessment of the archaeological objects on display. While the majority of the objects were from Mexico and adjacent countries, the collection also included Ecuadorian materials, including fragments of Valdivia figurines and Manteño face jars. A quick Google search for "Ecuador antiquities for sale" quickly returns numerous offerings, including spindle whorls, figurines, and even a Manteño stone seat. There is unfortunately a market for Ecuadorian cultural material.

(II) Has Ecuador has taken steps internally to protect its cultural resources, and is fulfilling its commitments under the current MOU?

Ecuador has taken several steps to protect its resources and does appear to be fulfilling its commitments under the current agreement. Programming at museums and archaeological sites emphasizes collective stewardship and care for the archaeological record, and steps have been taken to incorporate archaeological activity within a community framework. For example, in 2023 Ecuador took the notable step of adopting the first nation-wide code of ethics for archaeologists within Latin America. The ethical principles enshrined in this document emphasize the important role of local communities and collaboration in the archaeological process. Further, the INPC's recent *Lineas de Fomento* program has provided financial resources to communities, creatives, small businesses, and scholars alike to carry out projects that strengthen heritage practices and raise awareness about the country's cultural resource writ large.

The recent launch of the INPC-sponsored research journal *STRATA* and other periodicals helps to diffuse knowledge and respect for the past to Ecuadorian citizens. The online SPICE system has created an organized repository of archaeological sites and artifacts, making it easier for researchers to access information about cultural material. ~~for~~ Lastly, the development of the *Reserva Resefa Parducci* in Quito has created a safe storage place for artifacts to make them available to researchers.

These governmental steps are supported by a patchwork of nonprofit entities and individual archaeological projects, all of whom emphasize the participation of communities in the care and interpretation of the archaeological record. The archaeological project at Salango, directed by Florida Atlantic University faculty Valentina Martinez and Michael Harris, works closely with community members to conduct archaeological research and to preserve archaeological materials in the associated research station and museum. My project in Dos Mangas not only includes community members in the archaeological research, but has also operated various workshops for community guides, teens, and seniors to better understand what elements of their patrimony are most important for them, but also to educate about archaeological methods, past cultures, and care for the cultural heritage of Ecuador.

(III) Are import restrictions still the best available method the U.S. can use to prevent the importation of stolen objects?

Import restrictions are not only the best available method to prevent importation of stolen objects, but they are also the only real ones available. Given the porous nature of Ecuador's borders and the country's restricted resources, it would be impossible to seal all exit points, including the harbors that are the focus of increased violence for gang control. Import restrictions allow U.S. border personnel to stop suspect cargo coming in through the huge number of ports and methods of entry into our country (land, sea, air) and investigate its origins before releasing it. Without these restrictions, the process of stopping and researching a cargo's legitimacy becomes exponentially more difficult.

(IV) Is Ecuador open to foreign scientists and researchers studying its cultural resources, and making exhibits of its archaeological materials available to foreign museums?

Ecuador is welcoming of foreign scientists, and there are active projects conducted by researchers from other countries, primarily the U.S., France, and Russia, in collaboration with Ecuadorian archaeologists. Past rounds of the Fulbright Scholar award have given preference to researchers who intend to study the cultural patrimony of the country. Certain bureaucratic requirements make it more difficult for foreign researchers to hold permits in the country, such as the opaque assessment procedures of the SENESCYT degree certification, but these requirements are generally still more straightforward than those found in other countries in the region. Further, the unevenly applied requirement to rebury all non-diagnostic (in practice, all non-museum worthy) material at the end of a permit may limit the potential for long-running but episodic research, such as the type undertaken by foreign-led projects.

Despite these potentials for road bumps, my experience working in Ecuador has been a welcoming one. There is an active community of researchers who collaborate and present their research both within Ecuador and at conferences abroad, such as the Society for American Archaeology annual meetings. INPC staff are dedicated and helpful in ensuring that everyone complies with patrimony laws. Ecuador has an established process to request and receive permission allowing objects to be exported for specialized analyses when necessary. The Ecuadorian government has worked to balance their national interests in protecting cultural patrimony and maintaining it within their territorial boundaries, as well as encouraging the scholarly study of these objects by national and international scholars alike. I hope that the renewal of this bilateral agreement will ensure that adequate resources and attention continue to be given to the protection and investigation of Ecuadorian cultural resources.

Sincerely,

Sarah M. Rowe, PhD, RPA