

**HELLENIC REPUBLIC
MINISTRY OF CULTURE AND SPORTS
GENERAL DIRECTORATE OF ANTIQUITIES AND
CULTURAL HERITAGE
GENERAL DIRECTORATE OF RESTORATION, MUSEUMS AND TECHNICAL
WORKS**

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SUBJECT: Procedure for permits for sampling and analysis of moveable and non-moveable monuments and archaeological material in general

Translators note: The Directorates and Departments of the Ministry of Culture mentioned in the circular are presented here with their official Greek titles and acronyms where appropriate, and the English equivalents and transliterated acronyms as they appear in the translated circular

| English translation | acronym | Official Greek title | Greek acronym |
|--|----------------|--|----------------------|
| Directorate of Prehistoric and Classical Antiquities | DPKA | Διεύθυνση Προϊστορικών και Κλασικών Αρχαιοτήτων | Δ.Π.Κ.Α. |
| Directorate of Byzantine and Post-Byzantine Antiquities | DBMA | Διεύθυνση Βυζαντινών και Μεταβυζαντινών Αρχαιοτήτων | Δ.Β.Μ.Α. |
| Directorate of Conservation of Ancient and Modern Monuments | DSANM | Διεύθυνση Συντήρησης Αρχαίων και Νεωτέρων Μνημείων | Δ.Σ.Α.Ν.Μ. |
| Directorate of Restoration of Byzantine and Post-Byzantine Monuments | DABMM | Διεύθυνση Αναστήλωσης Βυζαντινών και Μεταβυζαντινών Μνημείων | Δ.Α.Β.Μ.Μ. |
| Department of Applied Research, DSANM | | Τμήμα Εφαρμοσμένης Έρευνας, Δ.Σ.Α.Ν.Μ. | |
| Department of Technical Research for Restoration, DABMM | | Τμήμα Τεχνικών Ερευνών Αναστήλωσης, Δ.Α.Β.Μ.Μ. | |
| Ephorates of Antiquities | | Εφορείες Αρχαιοτήτων | |
| Special Peripheral Services | | Ειδικές Περιφερειακές Υπηρεσίες | |
| Public Museums | | Δημόσια Μουσεία | |
| Services of Modern Monuments | | Υπηρεσίες Νεωτέρων Μνημείων | |

The Directorate of Prehistoric and Classical Antiquities (DPKA), Directorate of Byzantine and Post-Byzantine Antiquities (DBMA), Directorate of Conservation of Ancient and Modern Monuments (DSANM) and the Directorate of Restoration of Byzantine and Post-Byzantine Monuments (DABMM), which have co-jurisdiction regarding the process of granting permission for sampling and analysis of moveable and non-moveable monuments and archaeological material in general, taking into consideration law N. 3028/2002 “For the protection of Antiquities and Cultural Heritage” (ΦΕΚ 153/Α’/28-6-2002), make known the following:

I. GENERAL

The present replaces the previous circular, numbered ΥΠΠΟ/ΓΛΑΠΚ/ΑΡΧ/Α2/Φ30/22268/778/5-3-2004 entitled “Permitting process for analysis of archaeological material”. The intent of this new circular is to update and improve the previous relevant circular making use of the years of experience gained from the implementation of the previous by the Services that share jurisdiction, and to adapt administrative practices to the increased number of applications and new developments in applied research regarding the analysis of archaeological material. Covered by the articles of this present circular are any moveable or non-moveable monument protected by the articles of Law N. 3028/2002, including any and all evidence arising from archaeological research. **The terms and procedures set forth in the present circular are also enforced when the request is submitted by Services belonging to the Ministry of Culture and Sports.**

The following categories of applications are covered by the present regulations:

- A) Applications for analysis that require sampling.
- B) Applications that do not require sampling but presuppose an invasive procedure or cause an alteration to the material.
- C) Applications for examination-analysis with non-invasive procedures.
- D) Applications of all the above categories that relate to contemporary moveable or non-moveable monuments.

Such applications are submitted in the context of studying/publishing archaeological material and standing monuments, works of conservation and restoration, post-graduate or doctoral dissertations, European research or other programmes, etc. which require the analysis of the material to further the research issues under discussion. For applications included in a programme of field study approved by Ministerial Decree by the Ministry of Culture and Sports and relating to core sampling of sediments/soil in order to conduct analyses of mineral, sedimentational, geochemical, biochemical and palaeoenvironmental indicators, such as carbon (charcoal), seeds and other microbotanical residue (e.g. pollen, phytoliths, etc.), no further application must be submitted. In such a case, the precise evidence of the core sampling and analysis (e.g. site of sampling, laboratory, methodology, etc.) must be included in the yearly application to conduct or continue the said research project. A report of the results of relevant analyses shall be included in the proceedings of the study submitted each year to the appropriate Service.

Clarifications or information regarding sampling and types of technical analyses is provided by the Department of Applied Research, DSANM as well as by the Department of Technical Research for Restoration, DABMM.

II. SUBMISSION OF APPLICATIONS – PROCESS FOR GRANTING PERMISSION

Applications are submitted with all required accompanying documentation (see Chapter V) attached, in printed and digital form to the appropriate Service of the Ministry of Culture and Sports:

- For categories A-C to the Ephorate of Antiquities, Special Peripheral Services¹ or Public Museums and
- For category D to the YNEMTE or DPANSM or DNPAAPK for significant contemporary monuments.

(For the categories, see chapter I. General, categories A-D).

The appropriate services examine the applications based on category. In particular:

A) Applications for analysis through sampling using destructive or non-destructive methods, and

B) Applications that do not require sampling but which require invasive procedures (i.e. scraping, surface cleaning) or cause alterations to the material.

1. The above Services of the Ministry of Culture and Sports that receive the applications, after checking them for a) completeness, b) compliance with the terms of the present circular and c) timely submission by the applicant of results from already granted permission to sample and analyse material (see Chapter III), draft their findings and send them – in both printed and digital form – to the appropriate Directorates (DPKA or DBMA).

2. DPKA (Department Supervising Greek and Foreign Scientific Institutions and Coordinating Matters of International Cooperation and Organizations) handles the cases regarding material of the Prehistoric, Classical, Hellenistic and Roman periods and DBMA (respective Department) for the cases regarding material of the Early Christian, Byzantine and Post-Byzantine periods, as well as properties characterized as religious monuments that post-date 1830. These Directorates draft their findings and send them to the appropriate Services for issuing permits according to the type of material to be analysed (DSANM or DABMM).

3. Permission is issued by DSANM (Department of Applied Research) when the application relates to moveable monuments as well as sculpture, painting or decorative elements that form an integral part of non-moveable monuments, or by DABMM (Department of Technical Research for Restoration) when the application relates to non-decorative architectural elements and building material.

C) Applications for examination/analysis of material using non-invasive procedures.

The appropriate Services of the Ministry of Culture and Sports (Ephorates of Antiquities, Services of Modern Monuments, Special Peripheral Services or Public Museums), after checking applications for a) completeness, b) compliance with the terms of the present circular and c) timely submission by the applicant of results from already granted permission to sample and analyse material (see Chapter III), **grant permission directly** and notify DSANM or DABMM, depending on jurisdiction.

Non-invasive analysis/examination techniques are considered those that do not cause any alteration to nor require any processing of the surface of the moveable or non-moveable monument. Examples of such include: photographic methods, examination using conventional or digital stereoscope, x-ray, MRI, thermocamera, georadar, material strength measurement, x-ray fluorescence with portable device.

¹ Ephorate of Underwater Antiquities and Ephorate of Palaeoanthropology and Speleology

D) Applications of all categories relating to contemporary moveable or non-moveable monuments (excluding those properties characterized religious monuments post-dating 1830, see above Chapter II.2)

Interested scholars send their applications to the appropriate YNEMTE or DPANSM or DNPAAPK, which, after checking applications for a) completeness, b) compliance with the terms of the present circular and c) timely submission by the applicant of results from already granted permission to sample and analyse material, draft their findings and send them – in printed and digital form – directly to DSANM or DABMM (see above Chapter II.3).

III. TERMS AND CONDITIONS FOR SAMPLING AND ANALYSING MATERIAL

No sampling will be undertaken that requires the removal of part of complete moveable monuments according to article 26 of Law N. 3028/2002. An exception may be made and permission granted for the sampling of a complete object only if there are areas where the surface is already damaged, is without decorative characteristics, and the appropriate Services determine that the permission is advisable.

No sampling will be taken in areas where the alteration or loss will affect the restoration, interpretation or aesthetic result of the object.

The granting of permission to sample presupposes the preservation of a suitable quantity of the material so as to ensure that it is not exhausted by the procedure.

For analyses that require sampling, destructive methods shall not be implemented in instances where the same research aim is met by another, non-destructive method. In cases where a destructive method is selected, its necessity must be fully established, and the method that demands the smallest quantity of sample must be chosen.

In cases where samples are economised after analysis or non-use, these must be returned to the individual applicable Ephorate of Antiquities, Special Peripheral Services and Public Museums of the Ministry of Culture and Sports where they will be stored for future use.

New or supplemental permission for **the same material** shall be granted only when its necessity has been sufficiently proven. It will be granted, in other words, if the new study aims to acquire different or more reliable data.

New or supplemental permission to the **same researcher** shall be granted only if the terms of previous relevant decisions have been met, submitting the results of older analyses. In order to examine a new application, the interested party must first satisfy the terms of the previous permit.

When the sampling relates to a moveable or non-moveable monument (excavated find or find from another form of archaeological research, or standing monument) for which the exclusive publication rights have been granted to a scholar, the written approval of the holder of the exclusive publication rights must be obtained (see article 39 of Law N. 3028/2002 and the circular with registration number 4473/25.7.2011, “Terms and procedures for granting permission for scientific study and publication of standing monuments”). An exception is given for sampling or on-site analysis of material in order to undertake immediate protective measures for a moveable or non-moveable monument. In this case, the sampling is made without prior approval by the person holding exclusive publication rights. In no way does this infringe on the exclusive publication rights, and moreover the results of the sampling or on-site analysis are used exclusively for the conservation of the monument in question.

In instances in which the selection of archaeological samples to be analysed requires that they be collected from the field, this is considered to be archaeological field study and as such first requires the granting of the relevant permission to conduct archaeological research, according to the terms set out in the articles of Law N. 3028/2002, and subsequently the issuing of permission to sample or analyse.

IV. GENERAL EXPLANATION REGARDING PROCEDURES

It is clarified that:

- a) the applications in question do not need to be examined by the applicable Local Council of Monuments, and
- b) the applications for sampling and analysis are not to be considered general permission to study and publish the archaeological material, but allow the publication of the results of the analyses.

If the material to be studied or analysed within one research context relates to more than one Ephorate of Antiquities, Special Peripheral Service or Public Museum or Service of Modern Monuments, the applicant must report his/her similar applications made to other services within the Ministry of Culture and Sports so that extensive programmes can be addressed as a whole.

Permissions for sampling and on-site analysis are granted **for one year** from the date that the relevant decision is issued. Researchers are required to submit the results of their analyses within **three years** of the date the relevant decision is issued.

Any material which has been transported for analysis or sampling must be promptly returned to the place of its storage after the analyses are completed.

A representative of the applicable Ephorate of Antiquities, Special Peripheral Service or Public Museum, or Service of Modern Monuments, preferably a conservator, must be present during the sampling or conducting of on-site analysis of material.

When the conducting of examination or analysis or sampling requires the transportation of moveable monuments or fragments of monuments:

- A) to areas outside the jurisdiction of the Ministry of Culture and Sports
- B) outside the region of the applicable Ephorate of Antiquities/Special Peripheral Service/Public Museum and
- C) abroad

transportation permission is granted by the Directorate of Museums (DM) of the Ministry of Culture after the interested party submits a respective request to the applicable Ephorate of Antiquities, Special Peripheral Service or Public Museum following the granting of permission for sampling or analysis. The applicant assumes the responsibility and expenses for transporting the monument.

It is clarified that in cases for which permission to transport the monument is required, the amount of time allowed for the analysis and the deadline for submitting results is calculated from the date the transportation permission is issued.

It is emphasised that transportation permission is not required for samples taken and selected for analysis of microbotanical remains (i.e. seeds, phytoliths etc.).

V. REQUIRED APPLICATION FORMS

The special form “Application for sampling/analysis of moveable and non-moveable monuments and archaeological material in general” must be filled out by the applicant and

submitted with the required supplementary information. Relevant examples can be found at the following addresses on the World Wide Web:

1. <http://new.culture.gr/el/ministry/SitePages/viewyphresia.aspx?iID=1331> (http://www.yppo.gr/1/g1540.jsp?obj_id=2594) of the Directorate of Conservation of Ancient and Modern Monuments, and
2. <http://new.culture.gr/el/ministry/SitePages/viewyphersia.aspx?iID=1334> of the Directorate of Restoration of Byzantine and Post-Byzantine Monuments

In each case, the application is required to include the following information:

1. Statement of a) the broader context of the application and the research aim of the analysis of the material, b) the research institution in which the analysis will be conducted, the laboratory and the person responsible for analysing the material.
2. Written approval by the person/persons holding exclusive publication rights according to the terms set out in Chapter III.
3. Statement of the analytical techniques to be employed and, in the case of sampling, whether or not they are destructive, or in the case of on-site analysis whether or not they are invasive.
4. For all applications: detailed catalogue of moveable or non-moveable monuments to be sampled or selected for on-site analysis, which must be accompanied by photographic documentation (indicating the site to be sampled if possible).
5. Especially for applications for sampling: statement of total number, dimensions or quantity and form of the samples – as well as their preparation, if required – and a description of the manner in which the samples will be taken. The dimensions and number of samples must be the absolute minimum required to perform the analysis. Requests requiring large numbers of samples must be adequately justified in relation to the total quantity of material.
6. Especially for applications for on-site analysis requiring invasive procedures or causing alterations, the type and extent of the invasive procedure or alteration to the material must be described.
7. In instances where the applicant is a pre- or post-graduate student, the consent of the supervising professor is required.

Internal distribution

1. DSANM/TEE
2. DABMM/TTEA
3. DiPKA/TEEA EI
4. DBMA/TEEA EI

General Secretary Maria Vlazaki-Andreadaki

To:.....

Date:.....

**APPLICATION FOR SAMPLING/ANALYSIS
OF MOVEABLE AND NON-MOVEABLE MONUMENTS AND
ARCHAEOLOGICAL MATERIAL IN GENERAL**

APPLICANT INFORMATION

| | |
|--|---|
| Name: | or Service of the Ministry of Culture and Sports: |
| Profession: | |
| Institution: | |
| Contact information (address/ email/ telephone): | |

RESEARCH CONTEXT

| |
|---|
| <p>Educational – Academic Study •</p> <p>Research programme •</p> <p>Individual study •</p> <p>Study for Restoration – Conservation •</p> <p>Conservation of monument/object •</p> <p>Other •</p> |
| Brief description: |

ARCHAEOLOGICAL/ HISTORICAL DOCUMENTATION OF THE MONUMENT

Non-moveable Monuments

| |
|---|
| Name: |
| Geographical location: |
| Date: |
| Applicable Service of the Ministry of Culture and Sports: |

Analysing Foundation / Institution:

Laboratory / Lab Supervisor:

Contact information (address / email / telephone):

C) Examination – analysis using non-invasive techniques

Analysis technique (abbreviation/acronym if applicable):

Material:

Site / number of measurements (if applicable):

Analysing Foundation / Institution:

Laboratory / Lab Supervisor:

Contact information (address / email / telephone):

AIMS OF THE ANALYSES

| | |
|---|---|
| Estimate state of preservation | • |
| Select interventions | • |
| Following-up and checking previous interventions | • |
| Identification of material/composition | • |
| Definition of physical-chemical and mechanical characteristics | • |
| Identification of provenance | • |
| Identification of construction technology | • |
| Authenticate | • |
| Date | • |
| Study for environmental archaeology (paleopathology, paleozoology, paleobotany etc.) | • |
| Other (define) | • |

Justification for analyses outside Greece:

The technique is not performed in Greece •

Scientific reasons (scientific collaboration, specialisation etc.) •

Other (define) •

REQUIRED ACCOMPANYING DOCUMENTATION

1. Detailed catalogue of monuments (moveable or non-moveable) to be sampled or analysed on-site, with photographic documentation indicating the locations where samples will be taken (if possible).
2. Approval of the person/persons holding exclusive publication rights to the material.

Signature of applicant