

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

Athens, 9 June 2017

Prot. #YPPOA/GDAPK/DSANM/F77/217149/140435/2243

SUBJECT: Permits for sampling and analysis of movable and immovable monuments and archaeological material in general.

The Directorate of Prehistoric and Classical Antiquities, the Directorate of Byzantine and Post-byzantine Antiquities, the Directorate of Conservation of Ancient and Modern Monuments, the Directorate of Restoration of Byzantine and Post-Byzantine Antiquities, responsible for granting sampling and analysis permits of movable and immovable monuments and archaeological material in general, taking into consideration Law 3028/2002 "On the Protection of Antiquities and Cultural Heritage in General", inform you of the following:

I. GENERAL PROVISIONS:

The current document replaces the former relevant circular entitled "Granting permits for analysis of archaeological material", Protocol No. YPPO/GDAPK/ARX/A2/F30/22268/778/5-3-2004. The purpose of this new circular is to update and improve the previous relevant circular by making use of the experience of the responsible Services derived from application of the older circular for many years and of the adaptation of administrative practices to the large number of requests on the one hand and to the development of applied research for the analysis of archaeological material on the other. The provisions of this circular apply to any movable or immovable monument that is protected under the provisions of Law 3028/2002, including all kinds of evidence that result from archaeological research. The terms and procedures as described in the current circular also apply to the Services of the Ministry of Culture and Sports when submitting such a request.

The present provisions refer to the following categories of requests:

- A) Requests for analysis that require sampling.

- B) Requests for analysis that do not require sampling, but involve intervention or cause alteration to the material
- C) Requests for testing or analysis with non-invasive methods
- D) Requests of all categories that involve modern movable or immovable monuments.

Relevant requests are submitted within the context of the study and publication of archaeological material and standing monuments, conservation and restoration work, postgraduate dissertations or doctoral theses, European research or other programmes, which require analysis of material for the advancement of their research questions. **Requests that are included in the programme of a field project approved by decision of the Ministry of Culture and Sports and involve soil sampling, coring for mineral, sedimentological, geochemical, biochemical and paleoenvironmental indices, such as charcoal, seeds and other microbotanical remains (e.g. pollen, phytoliths etc.) do not require the submission of an additional request. In this case, the precise data on coring and analysis (e.g. sampling location, laboratories, methods of analysis etc.) must be included in the request that is submitted every year for the commencement or continuation of a specific field project. A report on the results of the analysis must be included in the account of the project's activity that is submitted to the responsible authorities at the end of every season.**

Clarifications and information regarding sampling and analysis methods are offered by the Department of Applied Research of the Directorate of Conservation of Ancient and Modern Monuments, as well as the Department of Technical Research of Restoration of the Directorate for the Restoration of Byzantine and Post-Byzantine Monuments.

II. REQUESTS SUBMISSION – PROCEDURE FOR ISSUE OF PERMITS

Requests are submitted along with all accompanying documents (see Chapter V) in printed and electronic form to the responsible Services of the Ministry of Culture and Sports:

- For categories A-C to the Ephorates of Antiquities, Special Regional Services (i.e. Ephorate of Maritime Antiquities and Ephorate of Paleoanthropology and Speleology) or Public Museums
- For category D to the Services of Modern Monuments and Technical Works or to the Directorate of Protection and Restoration of Modern and Contemporary Monuments or the Directorate of Modern Cultural and Intangible Cultural Heritage for modern monuments of major importance.
- (for the categories see I. General Provisions, Categories A-D)

The responsible services examine the requests on the basis of the categories, specifically:

**(A) Sampling requests for analysis using destructive or non-destructive methods, and
(B) Requests for analyses that do not require sampling, but require intervention (e.g. surface cleaning, scraping) or cause alteration to the material.**

1. The above responsible Services of the Ministry of Culture and Sports, who receive the requests, after assessing them for a) completeness, b) their compliance with the terms of the present circular and c) the timely submission or not of the results of a permit already issued for sampling and analysis of material (see section III) by the applicant, and form their recommendation and forward it, in printed and electronic form, to the responsible Directorates (Directorate of Prehistoric & Classical Antiquities, Directorate of Byzantine and Post-Byzantine Antiquities).

2. The Directorate of Prehistoric and Classical Antiquities (Department of Greek and Foreign Scientific Institutions, Organizations and International Affairs) is responsible for requests that involve material belonging to the Prehistoric, Classical, Hellenistic and Roman periods, and the Directorate of Byzantine and Post-Byzantine Antiquities and its corresponding department is responsible for requests that involve material belonging to the Palaeochristian, Byzantine or Post-Byzantine periods, as well as scheduled immovable religious monuments dating after 1830. The Directorates in question send their recommendation to the responsible Services depending on the type of material that is to be analysed (Directorate of Conservation of Ancient and Modern Monuments or Directorate of Restoration of Byzantine and Post-Byzantine Monuments).

3. The permit is issued by the Directorate of Conservation (Department of Applied Research) when the request involves movable monuments as well as sculpted, painted or decorative elements which are unalterable parts of immovable monuments or by the Directorate of Restoration of Byzantine and Post-Byzantine Monuments (Department of Technical Research of Restoration), when the request involves non decorative architectural elements and building materials.

C) Requests for examination or analysis using non-invasive techniques

After the relevant Services of the Ministry of Culture and Sports (Ephorates of Antiquities, Services of Modern Monuments, Special Regional Services or Public Museums) examine and evaluate the requests for a) their completeness, b) their compliance with the terms of the present circular and c) the timely submission or not of the results of a permit already issued for sampling and analysis of material (see section III) by the application, **they issue the permit**

directly and send a copy to the Directorate of Conservation or to the Directorate of Restoration of Byzantine and Post-Byzantine Antiquities depending on the material to be analysed.

Techniques of analysis and examination that do not cause alteration of and do not require any treatment of the monument's surface are considered as non-invasive techniques. These techniques are: photographic methods, examination under conventional or digital stereoscope, X-rays, computed/ magnetic tomography, thermal camera, geo-radar, crushometry, X-ray fluorescence with a portable device.

D) Requests in all categories that involve modern movable or immovable monuments (immovable religious monuments dating after 1830 are exempt, see above II.2).

The interested researchers are required to send their request to the responsible Services of Modern Monuments and Technical Works or to the Directorate of Protection and Restoration of Modern and Contemporary Monuments or to the Directorate of Modern Cultural and Intangible Cultural Heritage. After these Services examine the request for a) its completion, b) its compliance with the terms of this circular and c) the timely submission or not of the results of a permit already issued for sampling and analysis of material, they send their recommendation in printed and electronic form directly to the Directorate of Conservation or the Directorate of Restoration of Byzantine and Post-Byzantine Monuments (see above II.3).

III. TERMS AND CONDITIONS FOR SAMPLING AND ANALYSIS OF MATERIAL.

According to Article 26 of Law 3028/2002, the removal of samples from complete movable monuments is not permitted. Permission will only be granted in the event that there is a worn surface without decorative elements and only if the responsible authorities decide that issuing a permit would have a purpose.

If sampling causes destruction or loss of material that can affect the restoration, interpretation or the aesthetics of an object, sampling will not be permitted.

Sampling will be permitted only if on the condition that it ensures the retention of a sufficient quantity of the material such that it will not be exhausted.

Where analysis requires sampling application of a destructive method will not be selected in those cases where the same research goal can be met by a non-destructive method. In cases where a destructive method is chosen, its necessity must be satisfactorily documented and the method that requires the smallest quantity of sample must be chosen.

In the case that any samples are left over or remain unused after completion of the analysis these must be returned to the appropriate Ephorates of Antiquities, Special Regional Services

and Public Museums of the Ministry of Culture and Sports, where they will be stored for future use.

New or complementary permits for **the same material** will be granted only if their necessity is satisfactorily documented provided the new research seeks to obtain different or more reliable results.

New or complementary permits will be granted to **the same researcher** only if the terms of the previous permit have been adhered to and a report on the results has been submitted. In order for a new request to be considered, the interested party must first meet the terms of the previous permit.

When the sampling involves a movable or immovable monument (excavation find or find from another type of archaeological research or standing monument) for which exclusive rights for publication have been issued, then the written permission of the person holding the rights is required (see article 39, Law 3028/2002 and prot. No. 4473/25-7-2011 “Terms and Procedures for the Issuance of Scientific Study and Publication Permit of Standing Monuments”). Sampling or in situ analysis of material in order to apply immediate protective measures for a movable or immovable monument will be permitted as an exception. In this case, the sampling will be permitted without the approval of the person holding the exclusive publication rights. In this case, the exclusive publication rights are not affected and the results of the sampling/ in situ analysis are used only for the conservation of the monument in question.

In the case that the selection of samples requires collection from the field, this will be considered as archaeological fieldwork and will therefore require first the issue of a permit for archaeological fieldwork, according to the provisions of Law 3028/2002, and subsequently the issuance of the sampling/analysis permit.

IV. GENERAL CLARIFICATIONS REGARDING PROCEDURES

It is clarified that:

- a) examination of sampling/analysis requests by the relevant Local Council of Monuments is not required and
- b) sampling and analysis permits are not considered as study or publication permits, but they do permit the publication of the results of the analyses

When a research project involves sampling or analysis of material that belongs to more than one Ephorate of Antiquities, Special Regional Service or Public Museum or Service of Modern Monuments, the interested parties are required to mention in their request any other equivalent requests made to other departments of the Ministry, so that extensive projects can be dealt with as a whole.

Sampling and analysis permits are valid **for one year** from the date of issue of the relevant decision. Researchers are required to submit the results of their analyses **within three years** from the date of issue of the relevant decision.

Any material that has been transferred for analysis or sampling must be returned without delay to its storage location after completion of the analysis.

A representative, if possible a conservator, of the responsible Ephorate of Antiquities, Special Regional Service or Public Museum or Service of Modern Monuments must be present during the sampling or the in situ analysis of material.

When the sampling or analysis requires the transport of movable monuments or fragments of monuments:

- A) to sites outside the jurisdiction of the Ministry of Culture and Sports
- B) outside the area of jurisdiction of the responsible Ephorate of Antiquities/ Special Regional Service / Public Museum and
- C) abroad

the transport permit is issued by the Directorate of Museums of the Ministry of Culture and Sports after the submission of the relevant request by the interested party to the responsible Ephorate of Antiquities, Special Regional Service or Public Museum and after the issue of the sampling or analysis permit. Transport is carried out under the responsibility and at the expense of the person submitting the request.

To be clear, in cases where a transport permit is required, the period of validity of the analysis permit and the deadline for submitting the analysis report will be calculated from the date of issue of the transport permit.

It is emphasised that no transport permit is required for microbotanical remains sampled and selected for analysis (e.g. seeds, phytoliths etc).

V. NECESSARY DOCUMENTS ACCOMPANYING REQUESTS

Applicants must submit the special form "Request for sampling/analysis of movable and immovable monuments and archaeological material in general" along with all the necessary additional information. Samples of the form can be found on the following web-sites:

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
2. <http://new.culture.gr/el/ministry/SitePages/viewyphresia.aspx?iID=1334> of the Directorate of Restoration of Byzantine and Post-Byzantine Monuments

In all cases, the request must include the following information:

1. Reference to a) the wider framework/ context of the request and the purpose of the analysis of the material, b) the research institution where the analysis is going to take place, the laboratory and the person responsible for carrying out the analysis.
2. The written permission of the person who holds exclusive publication rights to the material, according to Chapter III.
3. Description of the analytical techniques to be applied. In cases of sampling, mention whether the technique is destructive or non-destructive. In cases of in situ analysis, mention whether the technique is intrusive or non-intrusive.
4. For all requests: a detailed catalogue of the movable or immovable monuments that are going to be sampled or examined in situ, accompanied by photographic documentation (indicating, if possible, the part from where the sample will be retrieved).
5. Specifically for sampling requests: the total number, dimensions, quantity and form of samples – as well as the method of their preparation, if required, and a description of the sampling method. The dimensions and number of samples must be the minimum required for the analysis. Requests that include a large number of samples must be sufficiently documented and must be proportionate to the total quantity of the material.
6. Specifically for requests for in situ analysis that require intrusive techniques or involve techniques that alter the material: a description of the type and extent of the intrusion or alteration to be caused to the material.
7. Requests submitted by an undergraduate/postgraduate student must be certified by a letter from their academic supervisor.

The General Secretary,
Maria Vlazaki-Andreadaki