



Loges, Luise (2025) *Cultural commodities in conflict. An analysis of moral panic in the discourse on antiquities trafficking in newspaper articles in Germany, 2003–2020*. PhD thesis.

<https://theses.gla.ac.uk/85471/>

Copyright and moral rights for this work are retained by the author

A copy can be downloaded for personal non-commercial research or study, without prior permission or charge

This work cannot be reproduced or quoted extensively from without first obtaining permission from the author

The content must not be changed in any way or sold commercially in any format or medium without the formal permission of the author

When referring to this work, full bibliographic details including the author, title, awarding institution and date of the thesis must be given

Enlighten: Theses

<https://theses.gla.ac.uk/>

research-enlighten@glasgow.ac.uk

CULTURAL COMMODITIES IN CONFLICT

AN ANALYSIS OF MORAL PANIC IN THE DISCOURSE ON
ANTIQUITIES TRAFFICKING IN NEWSPAPER ARTICLES IN
GERMANY, 2003–2020



Luise Loges

Submitted in fulfilment of the requirements for the degree of Doctor of Philosophy

**School of Humanities
College of Arts and Humanities
Department of Archaeology
University of Glasgow**

March 2025

ABSTRACT

This thesis is an analysis of the public discourse about antiquities trafficking from Iraq and Syria in Germany between 2003 and 2020. Germany is a market country for illicit antiquities, with a long-standing market for antiquities from Western Asia. During the researched period, widespread archaeological looting in the wake of the then-current conflicts in Iraq and Syria became public knowledge through reports in news media. At the same time several important changes in the German media's treatment of the German antiquities market can be seen, especially with regards to antiquities from Iraq and Syria. Moreover, in this time, changes in the legislation regulating the antiquities market were adopted in Germany, at the time widely seen as a reaction to the discourse. The development of the public discourse on antiquities trafficking in Germany is analysed in this thesis using the sociological concept of moral panic. To this end, German-language newspaper articles are investigated in detail using news framing analysis. The trends and themes emerging from this media analysis are then contextualised with texts from the lawmaking process of legal changes in Germany in 2007 and 2016, and reactions from the antiquities market.

With this methodology, I show that the public discourse on antiquities trafficking rapidly spun into a moral panic between mid-2014 and early 2015, centering the alleged involvement of the terror group Islamic State (IS) in the illicit antiquities trade, and that the following legal change of 2016 was falsely presented to the public as a consequence of the narratives promoted in this moral panic. The thesis concludes with a discussion on the lasting impact of this discourse, the social and intellectual consequences of moral panics and misconceptions about antiquities trafficking, and what this can mean for the future of cultural heritage policies in market countries for antiquities.

TABLE OF CONTENTS

Table of Contents

1.1 The scope of this thesis: Syrian and Iraqi conflict antiquities.....	1
1.1.1 Global social inequalities.....	2
1.1.2 The role of the media.....	2
1.1.3 Case study: Germany as a market country.....	3
1.2 Research Questions.....	5
Can the discourse on antiquities trafficking in Germany be considered a moral panic about cultural heritage?.....	5
What are the consequences of this discourse for the antiquities market in Germany?.....	5
Which lasting impact did the discourse have on society?.....	6
1.3 Chapter overview.....	6
Chapter 2: The background of this research.....	6
Chapter 3: Methodology and Methods.....	6
Chapter 4: Media Analysis.....	7
Chapter 5: Contextualisation of Legal Changes.....	7
Chapter 6: Contextualisation of Market Reactions.....	8
Chapter 7: Discussion.....	8
Chapter 8: Conclusion.....	8
2.1 The terminology used in this thesis.....	10
2.1.1 Antiquities.....	10
2.1.2 Looting and looters.....	11
2.1.3 Illicit.....	12
2.1.4 Provenance and provenience.....	12
2.1.5 Origin, transit, and market countries.....	13
2.1.6 "Western" and Western Asia.....	14
2.2 The illicit antiquities market.....	14
2.2.1 The structure of the market.....	15
2.2.2 Regulating the illicit antiquities market.....	18
2.2.3 Techniques of neutralisation and the illicit antiquities trade.....	22
2.3 The market for Iraqi and Syrian antiquities, 1991—2021.....	24
2.3.1 The market for Western Asian antiquities.....	24
2.3.2 The conflict and post-conflict looting of Iraq and Syria.....	27
2.3.3 The special case of illicit cuneiform texts.....	29
2.4 Moral Panic.....	32
2.4.1 The concept of moral panic since 1972, criticisms, and use in this thesis.....	32
2.4.2 Antiquities trafficking in the media: myths and misconceptions.....	35
2.4.3 Moral panic theory as applied in this thesis.....	37
3.1 Introduction to Methods.....	39
3.1.1 Source selection: Media analysis.....	40
3.1.2 Sample selection: Legal changes.....	41
3.1.3 Sample selection: Market reaction.....	41
3.2 Media Analysis.....	42
3.2.1 News Framing Analysis.....	43
3.2.2 News Framing Analysis — Template.....	44
3.2.3 News Framing Analysis — Example.....	47

3.3	Contextualisation of Trends and Themes of the Media Analysis.....	53
3.3.1	Coding.....	53
3.3.2	Legal changes: The Cultural Property Protection Law (KGSG).....	54
3.3.3	Reactions and consequences in the antiquities market.....	55
3.4	Benefits and limitations of the chosen methods.....	55
3.4.1	Benefits.....	56
3.4.2	Limitations.....	57
4.1	Timeline of news: overall peaks and trends.....	59
4.1.1	Before 2003.....	60
4.1.2	2003.....	60
4.1.3	2005–2007: Concern about looting in Iraq.....	61
4.1.4	2009–2011: An Iraqi gold vessel and other restitutions.....	62
4.1.5	2012–2013: Concern about looting in Syria.....	63
4.1.6	2014–2015: The Islamic State and moral panic.....	64
4.1.7	2015–2016: Reaction by authorities?.....	66
4.1.8	2016 and beyond: The moral panic dies down.....	67
4.2	Key themes emerging from the media analysis.....	68
4.2.1	From art to heritage.....	68
4.2.2	Emotional language.....	69
4.2.3	The terror and organised crime connection.....	69
4.2.4	Disproportional figures.....	70
4.2.5	Criticism of legal measures in Germany.....	70
4.3	Conclusion: A moral panic in the media.....	71
5.1	Introduction to legal changes in Germany, 2007–2016.....	74
5.2	Germany's cultural heritage law of 2007.....	75
5.2.1	The evaluation report of 2013.....	76
5.3	Key trends and themes in crafting the law of 2016.....	78
5.3.1	From art to heritage.....	80
5.3.2	Emotional Language.....	83
5.3.3	Terror financing and organised crime.....	85
5.3.4	Disproportional figures.....	87
5.3.5	Criticism of the (existing) legal condition.....	87
5.4	Summary of the legal analysis.....	88
6.1	Introduction.....	91
6.2	Sources.....	92
6.2.1	Texts analysed from the International Association of Dealers in Ancient Art (IADAA).....	93
6.2.2	Texts analysed from the Interessengemeinschaft Deutscher Kunsthandel.....	95
6.2.3	Market comments on the ILLICID report.....	96
6.2.4	Complementary texts related to public consultations on EU regulations.....	97
6.3	Key themes in the market reaction.....	98
6.3.1	From art to heritage: Antiquities as art and "shared heritage".....	98
6.3.2	Emotional Language.....	99
	Fears of expropriation and criminalisation.....	100
	Hostility.....	100
	The dichotomy between the legitimate and illegitimate trade.....	101
6.3.3	Terror and organised crime.....	102
6.3.4	Disproportional Figures.....	103
6.3.5	Criticism of legal measures.....	104
6.4	Summary of the market reaction.....	105
7.1	A Moral Panic about cultural heritage?.....	108

7.1.1 From media topic to moral panic.....	109
7.1.2 Heritage panic or terrorism panic?.....	112
7.1.3 Two moral panics in one?.....	114
7.2 The impact on the (German) antiquities market.....	117
7.2.1 Rebuttal and ridicule.....	117
7.2.2 Community building.....	119
7.2.3 A suitable enemy?.....	121
7.3 Impact on society.....	122
7.3.1 The terror focus.....	123
7.3.2 Changes and continuities in language.....	124
7.3.3 The legacy of a public discourse.....	126
8.1 Answers to the Research Questions.....	128
8.2 Significance and Implications.....	130
8.2.1 Contribution.....	131
8.2.2 Methodological Implications.....	132
8.3 Limitations.....	132
8.4 Future Research.....	133
8.5 A look ahead.....	134
A.1 Timeline of news: individual articles.....	135
Before 2003.....	135
2003.....	141
2005-2007.....	144
2009-2011.....	160
2012-2013.....	178
2014-2015.....	190
2016-2017.....	233
After 2017.....	245

LIST OF FIGURES

Fig. 1.1: Timeline of world events relevant to this thesis, including military activity (red arrows) and legislation changes in Germany (black arrows) against the data sample of newspaper articles analysed in Chapter 4. The orange arrow indicates an event in the Syrian civil war, which did not necessarily change military action, but (among others roughly around the same time) seems to have led to growing concern about cultural heritage in the media.

Fig. 4.1: Articles found mentioning the specified search terms in German national newspapers (black), and local newspapers (blue), as well as Austrian and Swiss newspapers (grey). Note the sharp peak in early 2015.

Fig. 7.1: This figure shows the total number of German-language articles mentioning at least one of the three search terms defined in Chapter 3 ("Raubgrabung" – "looting", or "Antikenschmuggel", "Antikenhehlerei" – "antiquities trafficking") between 2002 and 2021 found on Nexis for this study. The y axis shows the number of mentions, while the x axis marks the months. Note the peak in late 2014 and early 2015.

for Ûna

ACKNOWLEDGEMENTS

I owe the most profound debt of gratitude to my supervisors, Prof. Dr. Claudia Glatz and Prof. Dr. Donna Yates, for their sound advice, their constructive feedback, their good ideas and most importantly, their unending support and faith in this admittedly very long doctoral project. I am also grateful to Dr. Samuel Andrew Hardy, for his wise words and many an enlightening and encouraging conversation during his short year as my interim supervisor. I thank Dr. Leonhardt van Efferink for showing me a whole new way of thinking about newspaper articles.

I thank my fellow PGRs, the lecturers and staff members at Glasgow University's Archaeology Department who have over the years helped me with feedback and advice, but also just their good company. I am indebted to my husband, for many things including, but not limited to, his intolerance for filler words, which probably improved the quality of this text significantly. I will also remain forever grateful to the kind academics who have made their works available to me during the pandemic lockdown, when libraries were not accessible, especially Dr. Christina Tsouparopoulou and Prof. Dr. Kevin McGeough. Finally, I thank Dr. Lorna Richardson for working tirelessly to make my own work available to me (and my fellow authors) without having to spend £215.

AUTHOR'S DECLARATION

This dissertation is the result of my own work, except where indicated by referencing, and fully complies with Glasgow University's Statement on Plagiarism.

In accordance with the School of Arts and Humanities guidelines, this doctoral thesis does not exceed 100,000 words.

Signed:

Date: 31 March 2025

1 INTRODUCTION

In my present doctoral thesis, I investigate how the recent armed conflicts in some Western Asian countries, and the ensuing media and public discourse in one market country, Germany, have influenced the reputation and the practices of the antiquities trade in this country. The methods I use for this come from media studies and sociology, applied to a topic of note in the recent history of the archaeology of Western Asia. My positionality as an archaeologist of Western Asia who has worked in Syria as well as the Kurdistan Region of Iraq, and a science journalist with 10 years of experience of covering archaeological topics in popular formats make me uniquely qualified to undertake this research. My insight into the German media landscape as a German native speaker who has worked as a journalist in Germany made it possible to carry out the media analysis that lies at the heart of this thesis. The conflicts featuring most prominently in the media reporting on antiquities trafficking and consequently, my analysis, are the 2003–2011 American-led invasion of Iraq and the 2011–2024 (and ongoing) civil war in Syria. The so-called "gulf war" in Iraq, 1990–91, and the war in Afghanistan, 2001–2021, were considered in the data gathering stage of this thesis, but produced too little data to feature in the analysis, as will be discussed briefly in Chapter 4.

1.1 The scope of this thesis: Syrian and Iraqi conflict antiquities

The purpose of this thesis is to shed light on whether media coverage of and public outrage at antiquities looting and trafficking can lead to changes in the antiquities market and support better heritage protection policies. To do this within the scope of a doctoral thesis, the historical and political frame of this research project has been limited to the German reception of armed conflicts in Western Asia, with regards to archaeological looting and antiquities trafficking.

The illicit trade in antiquities looted during conflict has a long history (Hardy, 2015a) and is still ongoing. During the 2011–2024 Syrian civil war and the related attacks on Northern Iraq, the collapse of public order and resulting poverty have led to widespread looting of archaeological sites and museums in the disputed areas, causing damage to the archaeological record (Brodie, 2015a, 2022; Brodie & Sabrine, 2018). Illicit excavations have been conducted both by local citizens unaffiliated with any faction of the civil war, and on a larger scale by organised gangs, as well as the various armed groups operating in the region (Brodie & Sabrine, 2018; Casana, 2015; Munawar, 2023). The past wars in Iraq (1990–91 and 2003–2011), and in Afghanistan (2001–2021) have produced a similar pattern of conflict and post-conflict cultural looting (Brodie, 2011b; Stein, 2015; Stone, 2008). Subsequently, archaeological artefacts from these countries have been sold on the

international art and antiquities market (Brodie, 2011a, 2022). They likely have been trafficked through several countries to be "laundered" and sold seemingly legally to private individuals (Mackenzie et al., 2019). Some events of conflict and post-conflict archaeological looting and antiquities trafficking have become a topic of public discussion through news media even in destination countries for these antiquities such as Germany. The present thesis investigates how the German-language public discourse on antiquities trafficking has changed over time, how this change has impacted the market, and what this can mean for the future of heritage protection.

1.1.1 Global social inequalities

Antiquities trafficking is a matter of social justice as much as it is of cultural heritage protection. The destruction of cultural sites has a lasting impact on local communities. Not only do they face economic loss (Brodie, 2010), but they also lose access to their own cultural heritage, which has in 2011 been recognised as a human right (Lenzerini, 2023; Mackenzie & Yates, 2016b; United Nations, 2011). Especially civilians driven to looting archaeological sites during conflict likely do so under considerable personal risks and for very low gain, while looted cultural artefacts may be sold for high prices, and with little risk of legal consequences, to buyers in market countries (Mackenzie, 2011a; Mackenzie et al., 2019).

Moreover, looting for the antiquities market also does damage to the archaeological record and knowledge base by destroying the archaeological contexts of the illicitly excavated objects (Brodie & Renfrew, 2005; Coggins, 1995) and as such, hobbling the work of both international and local archaeologists studying the affected regions (Munawar, 2024). With antiquities being trafficked outside of the origin country, scholars and students from these countries lose the ability to study them, which can lead to, or rather further aggravate, global inequalities within the field, to the benefit of scholars based in former colonising countries (Brodie, 2020, 2023). Thus, the trafficking of looted antiquities out of conflict zones for the private market reinforces global social inequalities already affected by war.

1.1.2 The role of the media

To assess the consequences of this situation in one of the countries that benefit from this illicit market, public opinion and media portrayal are crucial. This is especially true in the modern media landscape, which is globally connected through both social and classic media. The present study evaluates the impact of conflict-related antiquities looting in one market country for Western Asian

antiquities, Germany, with a focus both on the public discourse, and the reaction by voices from the antiquities market.

Classic news media play a pivotal role in this assessment. All of the aforementioned conflicts have been widely publicised in European and North American media, and, starting with the looting of the Iraq Museum in April 2003, so has the loss of cultural heritage in conflict zones through illicit digging, intentional destruction, and collateral damage. After the rise of the so-called Islamic State (IS) terrorist group in connection with the Syrian civil war, the trafficking of Syrian and Iraqi archaeological artefacts, and with it the international antiquities market, have become a focus for both media and policy makers who have claimed a connection between illicit antiquities deals and terror financing (Losson, 2017). This conflation led to a short-lived peak in public attention on the topic of antiquities trafficking between 2014 and 2015, that nonetheless had lasting effects on the public discourse. The way in which the problem was presented—framed—in the newspapers and the ensuing public discourse had social ramifications both in the long and the short term, including a skewed reception of legal changes in the public sphere. I argue that the progress and the outcome of this discourse is consistent with the sociological concept of a moral panic (Cohen, 2002; Garland, 2008; Goode & Ben-Yehuda, 2011). This concept is therefore used as the theoretical framework to understand the data analysed in this thesis.

For this analysis, I assess changes in the public discourse on the antiquities market in one market country, Germany, by following the media portrayal of conflict and post-conflict looting in Iraq and Syria. This development, and key trends and themes emerging from the media reporting about conflict and looting, is then put into the context of relevant changes in laws and policies, and the reaction from the antiquities market itself. All of this is done with an awareness of colonialist and orientalist views in European and North American society on Western Asia and its past, taking into account the influence of the media on public sentiment, market dynamics, and policy development.

1.1.3 Case study: Germany as a market country

This research focuses on the development of the market in Western Asian antiquities in Germany, which has been identified as an important market country (following the definitions of O'Keefe and Prott (1992)) in the international antiquities trade. In 2019, a study on antiquities sold over the internet platform eBay, identified Germany as the fourth-largest seller of antiquities after the United Kingdom, the United States, and Thailand (Altaweel, 2019). Antiquities from the Eastern Mediterranean and Western Asia are also sold in Germany on other, more thematically dedicated,

internet auction platforms, as well as in auction houses and dealerships, and only very rarely with a verifiable provenance (Hilgert & Hemeier, 2020).

The present doctoral project is one of the first studies to analyse the media discourse on the illicit antiquities market in Germany in particular. While not as early or as prominent a colonising force in Western Asia as Britain or France, Germany nonetheless has had a strong colonial impact on this region through its alliance with the Ottoman Empire during and before the First World War (McGeough, 2015a). Imaginations of "the Orient" also had an influence in Germany, beginning in the late 19th century with the archaeological exploration of the colonised region, as much as in other European countries (Frahm, 2017; McGeough, 2015b). As such, antiquities from Western Asia have a high status among cultural commodities traded in Germany.

More recently, German forces took part in the 2001-2014 war in Afghanistan, but not the US-led invasion of Iraq. However, a strong German interest in both of these conflicts is clear from the news media of this period. The Syrian civil war and the connected Islamic State incursion on Syrian and Iraqi territories was also clearly a topic of note in German newspapers, as was an influx of Syrian refugees starting around 2015. News reporting on these topics also extended to reports on the looting and trafficking of archaeological objects out of the disputed territories, much like it did in most other European and North American countries. Moreover, a change in legislation, the amended Cultural Property Protection Law (*Kulturgutschutzgesetz*, KGSG) was implemented in 2016, which was framed in press statements as a direct response to the Syrian civil war and the alleged IS-antiquities connection. Thus, Germany is a fitting case study for understanding the media and public discourse on antiquities trafficking in a market country for Western Asian antiquities.

The goal of this case thesis is to provide a clearer picture of the social response to conflict antiquities and to legislation that aims to counter antiquities trafficking in times of armed conflict, as well as the wider impact of the public discourse on antiquities looting and trafficking. I do this by shedding light on the interdependence between popular media, public opinion, and policy response within the field of heritage preservation. This dynamic has implications beyond legislation alone, as it is connected to questions of global social inequality, and moral entrepreneurship about heritage and archaeology. My analysis thus expands our understanding of the sociological concept of moral panic within the heritage sphere, and demonstrates the lasting impact exaggerated media reporting can have on society and on an academic field, such as archaeology. The findings of this thesis may help lawmakers, law enforcement, and heritage professionals to avoid some of the pitfalls that come with moral panics. This in turn could help on the way to support robust policies for the protection of cultural heritage in the event of social and political crisis, not only in Western Asia, but worldwide.

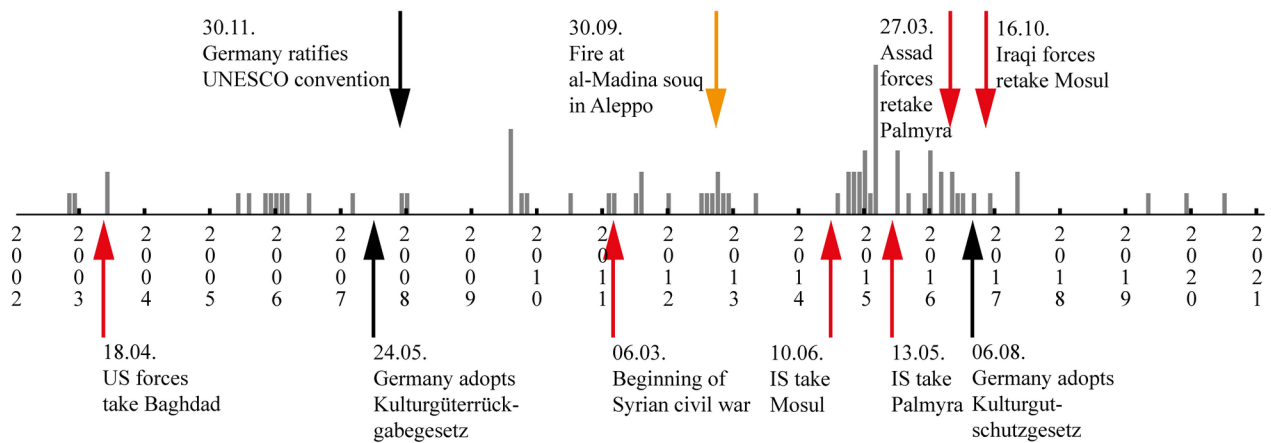


Fig. 1.1: Timeline of world events relevant to this thesis, including military activity (red arrows) and legislation changes in Germany (black arrows) against the data sample of newspaper articles analysed in Chapter 4. The orange arrow indicates an event in the Syrian civil war, which did not necessarily change military action, but (among others roughly around the same time) seems to have led to growing concern about cultural heritage in the media.

1.2 Research Questions

Following from these considerations, the research questions this study addresses are:

Can the discourse on antiquities trafficking in Germany be considered a moral panic about cultural heritage?

The concept of moral panic is useful here because it serves to gauge the influence media reporting on antiquities trafficking has had on the antiquities market in Germany, legally or socially. The term "moral panic" was popularised in 1972 by British sociologist Stanley Cohen, describing a social phenomenon in which a problem is widely exaggerated and distorted by the media, far beyond the actual scope of the issue, leading to lasting consequences in society (Cohen, 2002). To this end, I analyse newspaper reports on the topic of antiquities trafficking using news framing analysis (D'Angelo & Kuypers, 2009; Entman, 2004), investigating the changing trends and themes in the writing over time (Chapter 4). From these trends, five key elements of moral panic can be identified, which are *concern*, *consensus*, *disproportion*, *hostility*, and *volatility* (Goode & Ben-Yehuda, 2010, 2011). The media analysis is then contextualised with reactions from lawmakers, academics, and other influential figures (Chapter 5), as well as voices from the antiquities market itself (Chapter 6), to assess the impact the media discourse had on the public perception of the issue of antiquities trafficking. Finally, I evaluate whether, if there was a moral panic, it was a panic about cultural heritage or rather, the more general fear of terrorism (Chapter 7).

What are the consequences of this discourse for the antiquities market in Germany?

To address this question, I analyse the discussion around changes in legislation as well as some reactions from the antiquities market itself (Chapters 5, 6). Between 1991 and 2021, Germany not only ratified the 1970 UNESCO convention and crafted its first law to enact the guidelines laid out in it in 2007, and in 2016 amended this legislation into the Cultural Property Protection Law (KGSG). These legal changes have been largely received by the public as reactions to the widely reported conflict-related looting and trafficking of Iraqi, and later Syrian, antiquities. Since then, several new regulations on the import and trade of cultural objects at EU level, which also impact the German antiquities market, were adopted as well. The reactions from market actors to changes in legislation and the way the antiquities market was portrayed in the media, as well as their own part in the lawmaking processes, are weighed to assess the media reporting's impact on the antiquities market (Chapter 7).

Which lasting impact did the discourse have on society?

Finally, I evaluate in how far the social consequences of this discourse were felt beyond the sphere of the antiquities market, in the general public. That is to say, whether a profound change in attitude towards the illicit antiquities market can be felt, be it in general or just in connection to Western Asian conflict antiquities, or if this was only a short-term moral panic (Chapter 7). The portrayal of issues relating to Western Asia is also discussed using the concept of orientalism, considering the colonial legacy of many views and stereotypes on the region and its ancient heritage. I assess whether certain tropes and preconceived notions are addressed or change over the study period, and discuss what impact their presence in society has on the public perception of the issue of antiquities trafficking (Chapter 7, Appendix). The media conflation of terrorism and antiquities trafficking is also critically evaluated with the concept of orientalism in mind (Chapter 7).

1.3 Chapter overview

Chapter 2: The background of this research

In this chapter, I give an overview of the relevant literature which I used in order to be able to address the research questions. First, I present how antiquities crime researchers have understood and explained the global trade in illicit antiquities as a transnational criminal market, as well as the

problems they identified in countering this illicit trade. I then introduce the historical and ongoing market interest in Western Asian antiquities in the context of the conflicts in Iraq and Syria since 1991, as well as Germany as a market country. Finally, I introduce the concept of moral panic as a framework of understanding how the problem of antiquities trafficking was treated by media, lawmakers, and the public between 1991 and 2021.

Chapter 3: Methodology and Methods

In this chapter, I introduce the methods and methodology I used to determine whether a moral panic had taken place in Germany during the researched time period. As media representation and exaggeration are important factors in a moral panic, I chose the method of news framing analysis to help identify the trends and themes of the media discourse on antiquities trafficking in German-language newspapers. This chapter, consequently, first introduces news framing analysis, its uses and limitations, and provides an example drawn from an English-language article. Then, I introduce deductive coding, a method used in sociology to analyse texts with the help of pregenerated themes, called codes. I use this method to analyse texts drawn from the debates around legal changes in Germany, and the reactions of antiquities market actors, and contextualise them with the themes that emerged from the news framing analysis.

Chapter 4: Media Analysis

To assess whether a moral panic was taking place, I first conducted a news framing analysis of how German newspapers represented the looting and trafficking of cultural goods from Iraq, Syria, and other conflict zones in Western Asia, as well as Afghanistan, between 1991 and 2021. The analysis identifies at which point in time the issue of antiquities trafficking became a topic in the news, and then, how its representation changed over time. The analysis also showed the number of articles on the topic in a given time period, and therefore the weight given to it, as well as the lexical choices made by journalists, expert authors and interviewees. Analysing the lexical choices printed in the newspapers helped to identify the five key elements of moral panic defined by Goode and Ben-Yehuda (2010). I compiled the individual news framing analyses of 75 German-language newspaper articles, which can be found in the Appendix to this thesis, into a timeline of news, which shows the unfolding of the media discourse into a moral panic. Additionally, the framing analysis identified several key trends and themes in the reporting on antiquities trafficking, which were then used to contextualise the ensuing discussion about legal changes in Germany and the EU, and the reactions by antiquities market actors, in the following two chapters.

Chapter 5: Contextualisation of Legal Changes

The second step after the media analysis was to contextualise its findings. This contextualisation was broken into two parts. In Chapter 5, the debate around legal changes was analysed through coding, using the themes identified in the media analysis as codes. A moral panic usually includes, not only heightened concern fanned by mass media, but also calls to action towards the authorities to "change something", and at least apparent reactions by those same authorities (Cohen, 2002; Goode & Ben-Yehuda, 2011). Germany's Cultural Property Protection Law (KGSG) of 2016, can be seen as one such response, at least in the way it was presented to the public. The process of crafting this law, an amendment of the 2007 legislation to implement the then recently-ratified UNESCO convention, gives some insight on how public concern has influenced lawmakers. The public parliamentary consultation before and immediate market reactions to the 2016 law are analysed in Chapter 5, with a focus on how these debates reflect the preceding media discourse. In this chapter, I also discuss which stakeholders in the debate on antiquities trafficking are represented in the lawmaking process, and whose voices are ultimately heard.

Chapter 6: Contextualisation of Market Reactions

This chapter constitutes the second half of the contextualisation of the emergent themes from the media analysis. Here, public statements from members of the German antiquities dealing community are analysed, again with the themes identified in the media analysis used as codes, to find out if the statements of these market actors constitute a backlash to a moral panic. One development arguably influenced by heightened concerns about antiquities trafficking in Germany was the funding by the German government of the ILLICID project, which researched the German market in Eastern Mediterranean and Western Asian antiquities. The way this project was presented in market-friendly texts, and crucially, how the market reacted to it, are also discussed in Chapter 6.

Chapter 7: Discussion

The distortion of the public's view on antiquities trafficking through the media moral panic is discussed in Chapter 7. The question whether the moral panic about antiquities trafficking, which can be seen from the results of the media analysis, was truly a moral panic about heritage protection, is weighed here. Moreover, I discuss the impact this moral panic had on the German antiquities trade, and what social changes resulted from the moral panic, as well as some striking continuities, in light of the colonial legacy of the trade in Western Asian antiquities in Germany.

Chapter 8: Conclusion

This chapter brings together my findings and discusses their implications for research on the illicit antiquities market and their potential for heritage protection in the future.

The analyses made in this study, and the results that came from them, all constitute a contribution to answering the question of what policies may actually help protect the cultural heritage of humanity. Antiquities crime researchers have pointed out that one way to achieve this should be a more robust, stable, and fact-based communication between researchers, policy makers, and the general public (Brodie, 2022; Brodie et al., 2021; European Commission et al., 2019; Yates & Brodie, 2023).

The present study shows, by contrast, the effects of miscommunication by media and lawmakers to the public. Some reports in the media have apparently led to a heightened concern about cultural heritage abroad, yet these reports were also subject to some distortion, as is usual in a moral panic. Also, this thesis constitutes, to my knowledge, one of the first sociologically-focused studies specifically about Germany as a market country for illicit antiquities, and definitely the first discourse analysis on antiquities trafficking in Germany.

While market studies such as the ILLICID report are accessible (Hilgert & Hemeier, 2020), no study to date has investigated the changes in the rhetoric and behaviour of the German antiquities market in reaction to negative media attention and legal changes.

2 THE BACKGROUND OF THIS RESEARCH

This chapter outlines the background and context of my research with the literature I used to help address the questions raised in Chapter 1. As a first step, I define the terms I chose to use for the most relevant topics of this thesis. Then, I give an overview of the structure of the illicit antiquities market, as leading scholars of the illicit antiquities market have defined it, highlighting the aspects I found most important for its understanding in the context of this thesis. This leads into a brief discussion about measures to regulate the illicit antiquities market and why they have at least partially failed, problems of self-regulation, and alternative routes suggested in academic literature. Then follows a description of the market background for the illicit trade in Western Asian antiquities, that is, the historical and ongoing demand, and of the conflict-related looting of Iraq and Syria between 1991 to 2021. I conclude this chapter with an introductory discussion on the theory of moral panics, which I use as the theoretical framework for my thesis, and how it can be applied to the antiquities market in Germany during the researched time period.

2.1 The terminology used in this thesis

Before explaining the structure of the market in illicit Western Asian antiquities as defined by current research, I will give some definition on the terminology I chose to use in this study. I see precise terminology as crucial in the context of this project, especially due to the contents of later chapters (Chapter 4, 5 6) which deal with the lexical choices made by journalists and their interview partners, as well as market actors and other stakeholders in the discussion on antiquities trafficking and its regulation. My own terminological choices are referenced with some key works of literature on the topic of antiquities trafficking generally, and Western Asian antiquities, specifically.

2.1.1 Antiquities

This doctoral project is focused on the trade in antiquities, therefore, "antiquity" is the first term that should be defined here. I use this term here for a category of marketable cultural objects (Mackenzie & Yates, 2017, p. 74), which are often taken from an archaeological context. Antiquities are the "cultural commodities" referred to in the title of this thesis. In the transnational antiquities trafficking chain, as described in Mackenzie et al. (2019, p. 1), an antiquity starts "as an archaeological artefact" and later becomes "a commodity, then finally a collectible object of artistic or historical interest.". This also means that an antiquity can be a different sort of object in the eyes

of different viewers, for example, an archaeological find for an archaeologist, but an art object for a collector, or contraband for a criminal investigator. As this circumstance will feature in later chapters (Chapters 4, 5, 6), I will quote various terms the authors of analysed texts used in describing antiquities to demonstrate which point of view they had likely taken. Other than that, I will use the term "antiquity" throughout this thesis so as to avoid confusion, and because it can describe such an object at all these stages along the trafficking chain and from all the points of view discussed above.

2.1.2 Looting and looters

One of the main topics in this doctoral thesis is the media treatment of the looting of archaeological sites for marketable antiquities in the context of armed conflict as well as that of the people who carried it out. Therefore, "looting" and "looters" are defined next. "Looting" can be defined as the unscientific, and often illegal, extraction of an antiquity from its archaeological context, or its theft from a museum, religious structure, or other cultural institutions (Mackenzie, 2005; Mackenzie et al., 2019, p. 2).

The term "looter" is somewhat more loaded, and has been discussed by scholars. Some have made the argument that, especially under circumstances of war and economic hardship, the term "subsistence digger" is more fitting, and less inherently criminalising (e.g. Hollowell, 2006). Studies of looting in Iraq and Syria suggest that civilians hit by economic sanctions on Iraq after the first Gulf war, and later by the collapse of public order during the more recent armed conflicts in Iraq and Syria, have turned to looting ancient sites as a source of income under the threat of hostilities (Brodie, 2011b, p. 3, 2015a; Brodie & Sabrine, 2018, p. 76; Hardy, 2015b, p. 231; Stone, 2008). These people could indeed be called subsistence diggers, assuming that they have lost other options to sustain themselves. However, it has also been shown that motivations for looting are generally more complex than mere subsistence (Kersel, 2007). Some instances of conflict and post-conflict looting recorded in Iraq and Syria since 1991 have been traced back to criminal gangs and military factions (Almohamad, 2021; Casana, 2015, p. 151; Casana & Panahipour, 2014, p. 131; Davis & Mackenzie, 2014; Mackenzie & Davis, 2014), as well as people who have had ties to traffickers even in peace time (Brodie & Sabrine, 2018, p. 77). Moreover, it is rarely easy to judge whether someone participates in illicit digging purely for subsistence, and the picture is altogether more complex (Mackenzie et al., 2019, p. 4).

In this thesis, the motives and circumstances of people participating in antiquities looting are predominantly seen through the lens of news reporting. Whether they are portrayed as "subsistence

diggers" or, more negatively, as "looters", is a factor in the analysis of the reporting, and as such, both terms are used. More generally, when it is unclear who is responsible for looting, or when the different groups are viewed collectively, the term "looters" will be used in this thesis. This term should be then understood as a classification of what has been happening to a site or an antiquity, rather than a moral judgment of the diggers.

2.1.3 Illicit

The antiquities this project is focused on, while presumably looted, are illicit in their origin, rather than strictly illegal. It has been noted that illicit antiquities differ from other goods trafficked in transnational illicit markets in the way that their illegality can be seemingly removed through their moving from source to destination market (Mackenzie et al., 2019, p. 2). That is to say that, while unregulated excavation and export of antiquities may be illegal in one country, due to the transnational nature of trafficking the purchase may not be technically illegal in the country where the antiquities are sold, or any illegality may be plausibly denied. The term "illicit" can also carry a moral judgement beyond the legal status of an activity, that is, an activity that goes against current law, but is seen as morally justifiable might be called licit, it is not when seen as morally unjustified (Mackenzie, 2020, p. 5). I see the term "illicit" as more fitting than "illegal" due to these nuances. That said, while the term "illicit" is used in the English-language literature on antiquities trafficking (Mackenzie, 2005; Mackenzie et al., 2019), the German language knows no difference between the terms and illicit antiquities are often classified as "illegal". This problem came up in Chapters 4 through 6, where I usually chose to translate "illicit".

2.1.4 Provenance and provenience

Besides illicit, antiquities found on the international market can often be described as "unprovenanced", that is without a provable licit provenance given by the seller (Yates & Smith, 2020). Provenance generally refers to an antiquity's ownership history, although it has been pointed out that there is no completely clear definition that is universally accepted (Gerstenblith, 2019, p. 287, 2020, p. 463). A distinction of terminology made by scholars and also for this thesis is between "provenance" and "provenience", with the latter denoting the findspot, i.e., the exact place where an antiquity was unearthed in modern times (Coggin, 1995, p. 65 Footnote 2). As Mackenzie (2005, p. 5) puts it, "provenance includes provenience, but provenience does not include provenance", since a complete provenance should trace an antiquity back to its original findspot, but the findspot alone is missing crucial information on what happened to it since it was removed from there. Note that these

are the definitions commonly used by archaeologists, anthropologists, and art historians (Gerstenblith, 2020; Kersel, 2006 Endnote 2), despite some discussion about abandoning the terms (Gill, 2016; Marlowe, 2016). A legal definition was proposed by Gerstenblith (2020, p. 495), in which "provenience" legally means the country of origin, rather than the exact findspot, and "provenance" denotes specifically the antiquity's history after its modern discovery. Both definitions were kept in mind for the analysis of the texts in Chapters 4 through 6, and also for the rest of this background chapter.

It should be noted here that the German language again only uses one term, "Provenienz" for both provenance and provenience, but in the contexts that this word appears in during this study, the translation "provenance" is usually the correct one.

2.1.5 Origin, transit, and market countries

The antiquities trafficking chain is commonly divided into so-called "source", "transit" and "market" countries (Kersel, 2006; Mackenzie, 2005, p. 8; Mackenzie et al., 2019; O'Keefe & Prott, 1992; Prott, 2005). These have been defined in the past as the countries where illicit antiquities are primarily illegally unearthed and exported, those that they pass through, potentially gaining false paperwork, and those in which they are primarily bought under seemingly legal circumstances. Some publications also use "consumer" or "destination countries" instead of "market countries" (e.g. Alder & Polk, 2002).

Merryman (1986, p. 832) defined "source" countries as those countries where the supply of antiquities exceeds the national demand. He criticized national export bans, upheld internationally by the UNESCO convention of 1970, as "cultural nationalism" (Merryman, 1986, p. 842). His counter-model of "cultural heritage internationalism", and criticism thereof, are discussed below. Despite its wide use in literature, the term "source country" is not used in the present study, in order to avoid a commodity-centred terminology, which I feel the term "source" suggests. The term "origin country" for the countries where an antiquity was originally excavated, feels more descriptive to me. In some circumstances, especially in Chapter 5, the term "claimant state" will come up, denoting a (presumable) origin country that is in the process of claiming antiquities back, either on a legal or a diplomatic level. This term is taken from my translation of the relevant legal texts analysed later in Chapter 5.

I continue to use the terms "market country" and "transit country", both of which can apply to Germany, for the countries in which Western Asian antiquities are marketed, and which they are passing through, in keeping with the terminology used in most literature.

2.1.6 "Western" and Western Asia

This doctoral project deals predominantly with the treatment of antiquities from Syria and Iraq, two countries in Western Asia. I understand Western Asia here as the geographic region between and including Anatolia in the Northwest, Iran in the East, the Eastern Mediterranean coast in the West and the Arabian peninsula and the Persian Gulf in the South. The region is home to several ancient cultures of ongoing interest to antiquities collectors, as well as several countries that have seen armed conflict and archaeological looting in the researched time period between 1991 and 2021, including Syria and Iraq (Brodie, 2011a, 2011b, 2015a, 2022). This region is also often called the "Near" or "Middle East". The study of ancient Western Asian civilisations and languages is most widely known as "Ancient Near Eastern (ANE) studies". I favour "Western Asia" over "Near/Middle East" and "archaeology of Western Asia" over "Ancient Near Eastern studies", as it reflects more of a geographical description.

The second geographic focus of this thesis is in Germany as a market country for antiquities. There is a wide use of the term "Western" for Europe, but also culturally Europeanised countries such as the USA, Canada, and Australia. In the context of the colonial endeavours of the 19th century in Western Asia arose the idea of a dichotomy between a supposedly "civilised West" and a "barbaric East" (Said, 2003). The term "Western" still partly carries this orientalist meaning, especially when used in the context of "Western values", which echoes this dichotomy of civilisation vs. barbarism. However, "Western" can also be used more negatively, evoking the history of colonialism as injustice. Following these considerations, I avoided the term "Western" in this thesis in favour of more geographical terms, except when quoting or translating from newspaper articles. Both positive and negative connotations which the term can carry when used in newspapers are discussed briefly in Section 3.2.3, but I found the term too loaded to use either way.

With these key definitions in mind, the following sections can more clearly discuss the general structure of the international antiquities market, including the role of Germany as a market country for looted antiquities. After giving the structural background, this chapter will also discuss the market for Western Asian antiquities, the looting situation in the origin countries Iraq and Syria, and introduce the role of the media and the theoretical framework of moral panic, which is used to understand the developments seen during the researched time period.

2.2 The illicit antiquities market

As this research project is situated between the fields of archaeology, media analysis, and sociology/criminology, I present the state of research into antiquities trafficking with academic

literature relevant to my doctoral project. This section first introduces the global market in illicit antiquities, leading into a discussion of measures taken to regulate this market and the problems surrounding them, and finally considers the self-perception and efforts of self-regulation in the antiquities market, as discussed by antiquities crime researchers.

2.2.1 The structure of the market

Antiquities trafficking can be studied as transnational crime (Alder & Polk, 2002; Mackenzie et al., 2019, p. 40), meaning crime that crosses borders and affects more than one country (Mackenzie, 2020). While in some cases, such as the looting of Native American antiquities in the United States ("pot hunting"), or illegal metal detecting in the United Kingdom ("nighthawking") (Alder & Polk, 2002, p. 36; Mackenzie et al., 2019, p. 5), looters do not always work with an international market in mind, more often the looted antiquities are exported illegally and sold in a different country (Kersel, 2006; Mackenzie et al., 2019, p. 40).

Mackenzie (2020) argues that most forms of trafficking can be seen as "just business", albeit an illicit one. In that sense, antiquities trafficking can be studied as a simple business model, functioning along the lines of supply and demand. Market demand has been identified as an important driver for the looting of antiquities (Kersel, 2006, 2023a), although other motives can also drive it (Kersel, 2007). As mentioned above, the market is commonly divided into origin, transit, and market countries (Alder & Polk, 2002; Kersel, 2006; Mackenzie et al., 2019, p. 1; O'Keefe & Prott, 1992). Overall, the demand for antiquities tends to come from wealthier countries, while the supply tends to come from poorer countries (Kersel, 2006; Mackenzie et al., 2019). Some of the largest markets for illicit antiquities are still in Europe and North America (Mackenzie et al., 2019; Mackenzie & Green, 2007), but in recent decades, the market has also grown in other parts of the world, for example, in Asia (Yates et al., 2017).

Looters in origin countries might take a high risk for relatively little profit (Brodie, 2010). Many origin countries of antiquities have outlawed the unregulated excavation and export of their own cultural heritage (Brodie & Renfrew, 2005), yet especially under circumstances of poverty, political crisis and general insecurity, the incentive of the antiquities market can be enough for some individuals to take their chances (Brodie, 2006, 2015a; Brodie & Sabrine, 2018; Hardy, 2015b; Parcak et al., 2016; Stone, 2008). Moreover, even when looters are not facing legal consequences, be it due to corruption or the collapse of public order, they might face violence from other civilians, as has happened for example in Bolivia (Yates, 2014).

Merryman (1986) has criticized bans on the export of antiquities as "cultural heritage nationalism". He proposed a model of "cultural heritage internationalism", in which the cultural heritage of all humanity could be appreciated better by everyone in a freely flowing, legal international market (Merryman, 1986, 2005). However, the antiquities market exists in a system of global socio-economic inequality, in which antiquities tend to flow from poorer to richer countries and from poor to at least relatively wealthy individuals, as has been noted here. Consequently, Merryman's model has also been criticized, noting that in a free market it would benefit the wealthier nations and individuals far more than others, and as such would not allow all humanity access to the cultural heritage equally, as Merryman seems to suggest (Kersel, 2012, p. 77). Other criticisms of the model of "cultural heritage internationalism vs. nationalism" include that it is too simplistic (Kersel, 2017, p. 278) and that it moves the discussion away from the protection of cultural heritage towards the question of ownership (Prott, 2005). On this matter, Mackenzie and Yates (2016b) note that it is not states, but peoples, who have a right to their cultural heritage, while acknowledging that the relationship between states and local communities regarding heritage can be a problematic one. It has also been pointed out already by Coggins (1995) that framing antiquities trafficking only in terms of ownership rights disregards the loss of archaeological context and therefore, historical and scientific information, that comes with looting.

In terms of legality, the market in illicit antiquities can be called a "grey market". That is to say, research indicates that a market for antiquities which is entirely legitimate ("white"), and one that is entirely illegitimate ("black") do not exist as separate entities. While some if not most antiquities with incomplete or unprovable provenance on the market are looted, not all of them are. Yet both sorts are bought and sold in the same auction houses, websites, or private galleries (Mackenzie et al., 2019, p. 35). Also, at all stages along the supply chain, legitimate, illegitimate, and (morally and legally) ambiguous practices are inextricably mixed (Mackenzie & Yates, 2017). In this "grey" market, the connection between the looting of archaeological sites or cultural institutions in origin countries and the sale of unprovenanced artefacts from these places in consumer countries, i.e., how demand causes supply, is not always easy to prove, even if it seems obvious to archaeologists. For example, if they pass through several jurisdictions, antiquities can acquire false provenance narratives that lend buyers some plausible deniability (Mackenzie et al., 2019, p. 37; Yates & Smith, 2020, p. 386).

Gill and Chippindale (Gill & Chippindale, 1993) first published a quantitative approach to the provenance of a category of antiquities (in their study, prehistoric Cycladic figurines) on the market, finding that the vast majority of them had no provenience and only very incomplete provenance. The authors documented the rapidly growing amount of unprovenanced Cycladic figurines on the

antiquities market and in private collections, especially from the 1960s onwards, cross-referenced with first-person accounts by archaeologists, museum officials and market contributors on looting and forgery during this period. This development can be explained by changing tastes at the demand end of the trade: While seen as aesthetically inferior and “barbaric” until late into the 19th century, Cycladic figurines became an object of desire for art and antiquities collectors after the Second World War, especially in the 1960s. Following this change in taste, looting and forgery became widespread in order to satisfy this new demand (Gill & Chippindale, 1993). As a consequence, only a small part of the existing corpus of Cycladic figurines has archaeological context. The paper is one of the first comprehensive studies of the impact of a trend in the antiquities market as an incentive for looting and the subsequent damage to the archaeological record.

Between the two ends of the antiquities trafficking chain, looted antiquities can pass through several countries (Kersel, 2006, p. 191; Mackenzie et al., 2019, p. 7). These transit countries work as waystations where objects are bought and sold on by intermediaries, sometimes acquiring apparently legal paperwork, before they reach the country in which they are ultimately sold. Intermediaries at the later stages can be skilled experts with a high education and specialised knowledge of antiquities, often including a sort of broker connecting the two worlds of selling and buying antiquities (Mackenzie et al., 2019, p. 8).

On the demand end of the antiquities trafficking chain, the sellers and buyers are usually white-collar actors who can sometimes be very wealthy individuals (Mackenzie, 2005, 2011a). Antiquities dealers in market countries are often not perceived as criminals, even if they do interact with a transnational criminal market (Mackenzie, 2011a). This can in part be explained by the theory of the "spectrum of enterprise", which postulates that legitimate business and criminal business are not as clearly distinct as it seems (Mackenzie, 2011b, 2020). In terms of risk, it has been theorised that antiquities collectors may even be protected by a high standing in society, should they be implicated in the sale of looted antiquities (Mackenzie, 2011a).

In its most basic form, the model of the illicit antiquities market described here would see an antiquity passing through a number of different countries and the hands of several intermediaries from a disenfranchised subsistence digger in a poor country to a wealthy antiquities collector who buys it, thoroughly laundered and apparently legal, for a large sum of money from an upmarket antiquities dealership or a prestigious auction house. And while this scenario can happen, it has to be kept in mind that it is only the most extreme of a spectrum of possible pathways for illicit antiquities (Mackenzie et al., 2019, p. 5). Besides market demand, a variety of motives can drive looting (Kersel, 2007). Even in parts of the world affected by war or poverty, not all looters can be described as subsistence diggers, when criminal gangs and armed groups also take part in looting

(Almohamad, 2021; Brodie, 2011b; Davis & Mackenzie, 2014; Mackenzie & Davis, 2014; Sabrine et al., 2022), as do opportunists who may even have connections to other illicit trades (Brodie & Sabrine, 2018; Mackenzie et al., 2019, p. 4).

Meanwhile, during the last decades, the growing internet trade has made it easier to sell less prestigious antiquities more directly and worldwide at a price that is affordable even for less wealthy buyers (Brodie, 2015b, 2017; Hashemi & Waddell, 2022). Research into the online market in illicit antiquities has found a thriving trade with small antiquities of relatively low value, such as ancient coins, exists predominantly on open market websites like eBay (Altaweel, 2019; Hashemi & Waddell, 2022), or sometimes in more clandestine form, on social media sites such as Facebook (Hashemi & Waddell, 2022). By contrast, there is as yet no clear evidence for illicit antiquities sales being arranged on the even more secretive dark web (Hashemi & Waddell, 2022, p. 224). It can be said that both at the place of extraction of an illicit antiquity and its place of final sale, the picture can be more complex. Also, the steps in between origin and market can be, as described in one study that focused on transit, "surprisingly few" (Mackenzie & Davis, 2014, p. 722).

In sum, antiquities trafficking is a transnational criminal market, which has some parallels with other such markets, such as the illicit trades in wildlife, or diamonds (Mackenzie et al., 2019, p. 40), but is also unique in some features, such as the relatively public consumption of the trafficked goods at their destination market (Mackenzie et al., 2019, p. 2). Attempts at regulating this illicit trade have encountered a number of problems, which will be discussed in the next two sections.

2.2.2 Regulating the illicit antiquities market

Looting of archaeological sites for saleable antiquities not only makes those antiquities lose their archaeological context, which severely diminishes their value to science, but also damages those sites irreparably. This damage, consequently also to world heritage (Barker, 2018; Brodie & Renfrew, 2005), is just one of the harms caused by looting. It also causes significant economic and cultural loss to the origin countries and the local communities from where the antiquities are extracted (Brodie, 2010, 2020). It has even been suggested that antiquities trafficking may prolong existing conflicts, if not directly by financing armed groups, then by constituting a resource that different parties in an armed conflict might fight over (Losson, 2017).

One crucial tool designed to mitigate these harms and prevent antiquities trafficking is the 1970 UNESCO convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property (UNESCO, 1970). Signatory states to the convention make a commitment to enact laws that prevent the transnational trade in looted or otherwise

illegally obtained and exported cultural objects, including antiquities. Among the signatories are important market countries for antiquities, including the UK and the US (Prott, 2012). Most of these countries have implemented some form of national legislation against the illicit import and sale of looted cultural objects, including antiquities, within their borders (Barker, 2018, p. 458). Germany ratified the convention in 2007 and in the same year adopted a law to implement it (Neumann, 2013). Yet despite legal efforts to regulate the global market in illicit antiquities in keeping with the convention, the problem of antiquities trafficking persists (Barker, 2018; Brodie et al., 2021).

One of the reasons for this, as Brodie et al. (2021, p. 2) point out, is that attempts at curbing the trade concentrate too much on site protection at the origin, and police action during transit. Efforts to police and punish looting in origin countries have a set of problems. For one, and most importantly in the context of this thesis, in cases of state collapse due to armed conflict or political crisis, existing laws and policies are often simply unenforceable. For example, while archaeological looting and the export of antiquities are technically illegal both in Iraq and Syria, during the 2003–2007 invasion of Iraq or the 2011–2024 Syrian civil war, which both led to a widespread collapse of public services, punishment by state actors was barely possible, and hardly a deterrent for people in desperate situations (Brodie, 2011a, 2011b, 2015a, 2022).

In a study interviewing several participants in illegal excavations during the Syrian civil war, Brodie and Sabrine (2018) show that looters come from a variety of backgrounds, some having become subsistence diggers out of necessity, others having had ties to the trade even before the conflict (Brodie & Sabrine, 2018, p. 4). These interviews demonstrate that, even during peace times, some individuals turn to looting antiquities despite the risk of punishment.

Another problematic aspect of punishment at or near the extraction site of trafficked antiquities are the human rights of subsistence diggers and other disenfranchised individuals handling looted antiquities, which are at odds with the rights of communities to their heritage (Mackenzie & Yates, 2016b). Corruption and overstrained authorities also lead to failure to deter both looting and early-stage trafficking, especially in poorer countries (Mackenzie et al., 2019, p. 22). In Egypt for example, soaring poverty after the 2008 global financial crash and the so-called "Arab Spring" led to an uptick in looting activities, incentivised by market demand and with a transnational trafficking network ready to exploit the situation (Parcak et al., 2016). While unaffiliated civilians who loot and traffic antiquities out of poverty might be tied to the crime more easily by local law enforcement than organised gangs, they are often those who have the fewest options to change their situation and the least to gain from engaging in the crime (Hardy, 2015b). This makes attempts at policing and punishing them both ineffective and, if the looters' survival depends on the proceeds from looting, ethically untenable (Hardy, 2015b). It should be kept in mind for the purpose of this

thesis that, while there is a moral difference between subsistence digging and looting organised by military factions and criminal gangs, it is impossible to discern which of the two is the source of an antiquity when it is sold on the market, due to the clandestine nature of the "grey market" described above.

On the market end of the supply chain, the buyers of looted antiquities are rarely punished at all. Brodie (2011b) describes in some more detail the cases of Martin Schøyen, a Norwegian, and Jonathan Rosen, an American collector, who have amassed two important collections of presumably Iraqi cuneiform tablets after 1991. Although it is unlikely, as Brodie demonstrates, that they did not know the illicit origins of their cuneiform collections, neither collector had at the time been charged with any crime connected to the tablets (Brodie, 2011b, p. 8; Brodie & Kersel, 2014). Schøyen has since had part of his collection seized by Norwegian law enforcement, but it remains unknown whether he faced any legal repercussions beyond this (Metzgar, 2024).

Even in the rare cases that buyers of looted objects are prosecuted, consequences are rarely tailored to dissuade the collectors from continuing with their illicit behaviour. A now famous (or infamous) example for this problem is the case of 4,500 Iraqi antiquities purchased by US retail company Hobby Lobby. In July 2017, US prosecutors filed a civil complaint against the company for smuggling of 5,500 antiquities from Iraq into the US. The owners of the company agreed to forfeit these artefacts and additionally, to pay a \$3 million settlement, but no criminal charges were brought against them (Yates, 2017). In the years following, they voluntarily returned 6,500 more clay artefacts, mostly cuneiform tablets, to Iraq, and additionally 5,000 papyrus fragments to Egypt (Brodie, 2020; Gerstenblith, 2022). Measured by their estimated net worth, the original \$3 million settlement amounts to little more than a "slap on the wrist" for the Hobby Lobby owners (Yates, 2017). Moreover, by "donating" antiquities from their for-profit company to their non-profit museum at an appraised value that far exceeded the purchase price they even made a financial profit from the illicit acquisition. It was this financial windfall the \$3 million were paid as compensation for – as opposed to a fine (Brodie, 2020, p. 91). This compensation was paid to the market country, the USA, for tax misconduct. Tax fraud through museums donations by wealthy collectors is not an uncommon spin-off product of antiquities crime, as Yates (2015a) explains: museum donations by collectors are often subsidised by governments, but these fiscal incentives are easily exploited, as they are based on the value of the donated antiquities, which is subjective (Yates, 2015a, p. 174). As for the origin country of the Hobby Lobby tablets, most likely looted in Southern Iraq around the time of the 2003 American-led invasion (Gerstenblith, 2022, p. 80), Brodie (2020, p. 99) argues that their return, divorced from their archaeological context and after publication by foreign

scholars, constitutes an inadequate recompensation for the harms suffered. Yet it seems as if the company and its owners effectively saved face with their public repatriation efforts.

The apparent relative safety from punishment afforded to wealthy buyers of looted antiquities may be based on high social status and economic power (Mackenzie, 2011a, p. 23). But they have also been shown to use techniques to avoid being punished. In his 2005 study of the antiquities market in the UK, Mackenzie (2005) concluded that dealers, auction houses and even museum officials were often content with following the letter – as opposed to the spirit – of the law, regarding the provenance of their antiquities. This sort of conduct, which has also been called "creative compliance" (McBarnet, 2001, 2006; McBarnet & Whelan, 1991), has been shown to be a widespread tactic in the antiquities market to avoid legal consequences while still buying potentially looted antiquities (Mackenzie et al., 2019, p. 79).

It could then be argued that stemming the flow of illicit antiquities from the market end of the trade might mean a harsher punitive approach towards the buyers of looted antiquities than is usually taken to white-collar crime. Mackenzie (2011a), however, cautions that harsh punishments often prove ineffective, whether they are directed at looters or dealers.

Beyond legal measures, the 1970 UNESCO convention has led to some changes in attitudes towards antiquities acquisitions in market countries. For example, since the adoption of the convention, many museums have adopted 1970 as a cut-off date, or "provenance threshold" for their acquisitions, meaning that they decline to purchase antiquities which demonstrably left their country of origin after that date (Brodie & Renfrew, 2005; Gerstenblith, 2013; Prott, 2012).

Numerous museums and museums' associations in several countries have adopted codes of ethics to ensure the legitimacy of their acquisitions, sometimes referring to 1970, sometimes not (Brodie & Renfrew, 2005, p. 351). However, these codes have been subject to some degree of interpretation and are applied somewhat unevenly across the museum sector (Brodie et al., 2021). Overall, like punitive approaches, "soft" measures such as museums' and antiquities dealers' self-imposed ethics codes do also not seem altogether effective. Mackenzie (2011a, p. 22) therefore argued for implementing a "missing middle" of sanctions to more effectively prevent market actors from engaging with the illicit trade.

It has also been suggested that selling antiquities without a provenance that could place the merchandise outside of the jurisdiction of its origin country before the cut-off date of 1970 would make antiquities harder to sell in market countries and lower the price that could be asked for them (Brodie, 2014a). By the rules of the free market, it would follow that dealers would strive to obtain antiquities with better provenance that could fetch higher prices, and thus, the market share of looted antiquities would decrease. This idea has been called autoregulation of the antiquities market

(Brodie, 2014a; Mackenzie et al., 2019, p. 94). However, in a quantitative analysis of auction house sales to test this hypothesis, Brodie (2014a) found no clear evidence for an effect of the 1970 provenance threshold on the price of antiquities. Mackenzie et al. (Mackenzie et al., 2019, p. 114) updated this finding with long-term data, arguing that while antiquities without a provenance before 1970 continued to be sold at high prices, there were stronger efforts to obscure unclear provenances. Brodie et al. (2021) identify several gaps and shortfalls in attempts to stop the global illicit trade in antiquities. Among other problems, they point out that in many countries, the art market lobby has so far been successful at preventing the adoption of effective, market-restricting legislation (Brodie et al., 2021, p. 6). The reaction of antiquities market actors to laws they fear will be detrimental to their businesses will be examined in Chapter 6.

2.2.3 Techniques of neutralisation and the illicit antiquities trade

One of the reasons for both the law's and self-imposed ethics codes' failure to deter dealers and collectors from purchasing looted antiquities lies in the public perception, and most importantly the self-perception, of these market actors. In market countries, being an antiquities collector is generally perceived as a respectable and "classy" hobby, and the existence of upmarket antiquities dealerships is viewed as contributing to the cultural wealth of the country as a whole (Mackenzie, 2011a, p. 12). It can be surmised that antiquities dealers and collectors are people who do not think of themselves as criminals, despite taking part in a criminal market and despite the actions they might take to circumvent the law.

A closer look at this phenomenon was taken by Mackenzie (2014) to investigate arguments antiquities dealers use to justify their handling of potentially looted objects – before others and themselves. Mackenzie identifies several ways of avoiding a feeling of guilt when dealing with unprovenanced antiquities by analysing the comments of several dealers. He demonstrates that even those who admit to knowing they act in a legally questionable or outright illegal way, would not see themselves as criminals, but rather, try to justify their actions (Mackenzie, 2014, p. 505). The reasoning behind these justifications is shown to follow the five "techniques of neutralisation" postulated by Sykes and Matza (1957), used by criminals to avoid a feeling of guilt at their actions: The denial of injury, denial of responsibility, denial of the victim, condemnation of the condemners, and the appeal to higher loyalties (Sykes & Matza, 1957).

Prominent with antiquities dealers is the denial, or undermining, of the victim, in this case origin countries or communities directly affected by looting of their archaeological sites. The publicity of widespread looting in times of conflict, for example, may feed into the narrative that the

communities connected to the looted sites are not fit guardians of their cultural heritage in the first place (Brodie, 2020, p. 97; Mackenzie, 2005, p. 176). In a perfidious case of circular reasoning, this failure to safeguard heritage, exemplified by antiquities looting and trafficking, is used as a justification for taking part in the trafficking (Mackenzie, 2014, p. 507).

In the case of Western Asia, like other formerly colonised regions, the denial of the victim can also tie in with orientalist ideas of the "barbaric East" as opposed to the "enlightened West". Even in the earliest depictions of colonial conquest, the colonisers were eager to present the local population as uninterested in or incapable of maintaining the ruins of their ancient past (McGeough, 2015a, p. 34). This narrative was then used to justify the plunder of the colonised regions for the benefit of the colonial powers' own museums.

It would be too easy to dismiss antiquities dealers and collectors simply as blinded by orientalist prejudice, though. As discussed above, the antiquities market is a "grey market" – not entirely legitimate, but also not completely illegitimate (Mackenzie & Yates, 2017). The "grey" aspect describes not only the legal situation, but also the moral perception of many deals in antiquities. Even though, as Mackenzie & Yates (2017, p. 72) point out, every stage in the antiquities trafficking chain is to some degree illegal, every stage has its own legitimising narratives: looting carried out by people in desperate economic circumstances can be justified by the need to survive and the opportunity the international demand for antiquities poses. The purchase of looted antiquities in market countries can be justified by the wish to safeguard them for posterity, after "the damage is done" (Westenholz, 2010; White, 1998). In combination, these two narratives can become a vicious circle of shifting blame.

The narrative of "saving" antiquities also makes the purchase of looted antiquities into a service to high culture, which echoes the image of antiquities dealers and collectors as figureheads of a cultured society, discussed in Mackenzie (2011a). Moreover, this narrative constitutes another neutralisation technique *sensu* Sykes and Matza (1957): the appeal to higher loyalties – the higher loyalty here being to the antiquity itself, or history. The argument of saving history comes up especially often around illicit text finds, where academics who study, translate and publish these texts also defend their involvement with the same neutralisation technique, (Brodie, 2020, 2021). The same neutralisation techniques were shown to be used in other illicit markets, such as the collecting of rare orchids, a practice that does damage to fragile ecosystems and biodiversity in a similar way that looting antiquities does to the archaeological record (Mackenzie & Yates, 2016a, p. 345). The appeal to higher loyalties is apparent in both groups of collectors, who generally seem to feel that their efforts toward caring for the objects of their collector's passion supersedes the law (Mackenzie & Yates, 2016a, p. 352).

The third neutralisation technique antiquities dealers and collectors use, is the condemnation of the condemners, directed against archaeologists and antiquities crime researchers who criticise the illicit trade (Mackenzie, 2005, p. 166, 2014, p. 508). They are, as Mackenzie (2014, p. 508) explains, often portrayed as lonely figures straying against the norm of cultural appreciation. A possible case of slander based on this particular rhetoric will be touched upon in this thesis (see Appendix A.1), but the condemnation of condemners can also take the form of railing against a supposedly powerful archaeologist lobby out to destroy legitimate businesses (see Chapter 6). The following section discusses more specifically the market for Iraqi and Syrian antiquities within the international illicit market outlined above, during the time period researched in this thesis.

2.3 The market for Iraqi and Syrian antiquities, 1991—2021

While not all antiquities flow from low-income to high-income countries, there are some regions whose archaeological cultural heritage is trafficked on the international antiquities market particularly frequently. They can be described as "archaeologically rich" (Kersel, 2006, p. 190), due to historical and ongoing market interest in their ancient cultures. While this includes, for example, Graeco-Roman antiquities from Europe, or Native American antiquities from North America, both of which are looted and sold on the illicit antiquities market (Mackenzie et al., 2019, p. 5), archaeological looting disproportionately affects regions such as South and South East Asia, Mesoamerica, Egypt, and also Western Asia. In these regions, looting has also been exacerbated by recurring conditions of instability and economic crisis (Parcak et al., 2016; Yates, 2015b), sometimes even armed conflict (Brodie, 2015a; Davis & Mackenzie, 2014) during the last decades. The following two sections outline the historical and ongoing background of the interest in Western Asian antiquities, concluding with an introduction of Germany as a market and transit country for illicit Iraqi and Syrian antiquities, and the conflict-related looting of Syria and Iraq.

2.3.1 The market for Western Asian antiquities

Antiquities from Western Asia have been of great interest for European and North American antiquities collectors for almost two centuries. The region defined above as "Western Asia" includes, among others, the modern countries of Iraq and Syria, as well as Jordan, Lebanon, Israel and Palestine, Iran, and Turkey. Together with Egypt, this region has historically been an object of colonial endeavours, which facilitated the rise of archaeological exploration in the area by envoys of the colonial powers (McGeough, 2015a).

The political circumstances around the beginnings of Western Asian archaeology led not only to a generally colonial interpretation of Western Asian cultural heritage, but also, to the widespread plunder of archaeological sites for the benefit of museums in the home countries of the colonisers (Bahrani, 2018; McGeough, 2015b). Beside "official" acts of taking home spoils from the colonised area, more clandestine methods of antiquities trafficking were practised already in the 19th century, after bans on the export of cultural heritage were issued by Ottoman authorities. Examples for this can be found in the letters of antiquities dealers in Iraq to the British Museum, one of the most explicit of which is written by the Baghdad-based dealer Elias Géjou, who described in detail how he smuggled cuneiform tablets hidden in aniseed bags past Ottoman customs (Ait Said-Ghanem, 2022).

In the 21st century, Western Asian antiquities still hold a special allure to some collectors. This is partly due to the region's association with biblical traditions. Antiquities from the "Holy Land" are still of great interest to European and North American audiences, both as tourists and museum visitors, and as buyers of antiquities (Brodie & Kersel, 2012; Kersel, 2020, 2023a).

Iraq and Syria are also home to important biblical sites, such as Ur or Niniveh, and moreover, some of the oldest literate cultures known to scholarship prospered here. Objects inscribed in cuneiform are one of the most sought-after cultural commodities from Western Asia (Brodie, 2021). The association with ancient literary culture can lend collectors a sheen of enlightenment, as texts have a high cultural value (Brodie, 2014b, p. 35).

Unprovenanced antiquities from Iraq and Syria have sometimes been called "Mesopotamian" when they were offered for sale, for example on the internet (Brodie, 2011a, p. 123 Table 7.2). This term, borrowed from ancient Greek, for the ancient cultures situated between and around the rivers Tigris and Euphrates, seems to suggest an ancient origin. However, the term "Mesopotamia" only came into wider use for that area during the First World War, originally coined by the British general Lord Kitchener for his "Mesopotamian campaign" (Rattenborg, 2018). While the term quickly faded out of use in politics, it continued to be used in the academic world for the ancient cultures of the area, superseding the hitherto more common terms of "Babylonia" and "Assyria" in English, as well as in French and German (Rattenborg, 2018, p. 159 figs 4-6). The term can also be used to obscure an illicit origin tainted by conflict: Brodie (2011a, p. 122) notes that, in the aftermath of the American-led invasion of Iraq in 2003, sellers apparently reluctant to give "Iraq" as the findspot of their merchandise, seemed to opt for the term "Mesopotamia" instead.

In Germany, like in other European countries, interest in Western Asian antiquities can be traced back at least to the late 19th and early 20th century (McGeough, 2015a). Several public museums house important collections of Western Asian antiquities assembled mainly during colonial times,

the most well-known being the Pergamonmuseum on Berlin's "museum island". In 1902, the last German monarch, Emperor Wilhelm II, attended a lecture titled "Babel und Bibel" by cuneiform scholar Friedrich Delitzsch (Arnold & Weisberg, 2002, p. 441). This lecture was the first of a three-part series, which made the then young field of Assyriology widely known in Germany at the turn of the 20th century, partly due to its – at the time scandalously – anti-biblical stance (Lehmann, 1994; McGeough, 2015a, p. 173). The ensuing controversy sparked widespread interest in the history of ancient Western Asian cultures in the wealthier parts of the German public. As in other European countries, an appreciation for Western Asian antiquity was a respected hobby in the 19th and 20th centuries (Frahm, 2017).

In recent years, laws and regulations have been adopted in Germany that specifically deal with the protection of foreign cultural property and the import of illicit cultural goods (Müller-Karpe, 2011a). One such measure was the ratification of the 1970 UNESCO convention in 2007 and the following law of 2007 (Neumann, 2013). The late adoption of the convention has been criticised by archaeologists (Müller-Karpe, 2011a). In 2016, the 2007 law was amended into the Cultural Property Protection Law (*Kulturgutschutzgesetz*, KGSG), in order to better fulfil its stated purposes. Despite these measures, Germany is still a market country for unprovenanced antiquities from Western Asia and beyond (European Commission et al., 2019). Beside auction houses and private dealerships, there are also amateurs and small-time dealers in the business, as can be seen for example from unprovenanced antiquities found for sale on flea markets (Tollkühn & Otterbeck, 2017). In terms of internet sales of antiquities, Germany has been identified as the country with the fourth-most sales of antiquities on eBay, surpassed only by the United States, the United Kingdom, and Thailand (Altaweel, 2019). These studies point to Germany being an active trade hub for antiquities.

Around the time of the adoption of the KGSG, an investigation project was launched to assess the percentage of illicit cultural objects from Western Asia and the Eastern Mediterranean on the German antiquities market, called the ILLICID project. The investigation was carried out by a multidisciplinary group of researchers from 2015 to 2018. The study found that satisfying provenance could be established for only 0.4 percent of antiquities originating from Iraq, and 9.6 percent of objects from Syria (Hilgert & Hemeier, 2020). While the ILLICID report does not answer all questions it set out to, such as the stated purpose of uncovering links to terrorist groups and organised crime, it seems to confirm that Germany is a trade nexus for illicit antiquities. The discussion around the amended cultural heritage legislation in Germany, as well as the government-funded ILLICID project, are analysed in Chapters 5 and 6 of this thesis.

In light of this background on the interest in Western Asian antiquities, in Germany among other countries, the following section deals with more recent events of conflict and post-conflict archaeological looting in Iraq and Syria and the reactions of the international antiquities market.

2.3.2 The conflict and post-conflict looting of Iraq and Syria

Iraq has been the theatre of two wars between 1991 and 2007, while Syria has been entangled in a bloody civil war from 2011 until at least 2024, with some regions still in conflict by the time of writing (early 2025). Both conflicts have demonstrably led to widespread looting of archaeological sites, as well as museums and other cultural institutions (Almohamad, 2021; Brodie, 2011a, 2015a, 2022; Casana, 2015; Casana & Laugier, 2017; Casana & Panahipour, 2014; Sabine et al., 2022; Stone, 2008). Both countries have banned the export of antiquities found within their borders (Brodie, 2011a, 2015a; Cunliffe, 2012).

In Iraq, the export of antiquities has been illegal since 1974, while after 1990 sanctions prohibited any trade with Iraq under international law (Brodie, 2011a). Nevertheless, the international trade in unprovenanced Iraqi antiquities never stopped (Brodie, 2011b; Gerstenblith, 2022; Gerstenblith & Kersel, 2023). Elizabeth Stone (2008) gave an overview of looting patterns in Iraq after the 2003 invasion based on satellite images and aerial photographs, which cross-referenced with information on the occupation periods of the most targeted sites. Stone showed that smaller, as yet unexcavated sites had been hit by looting most severely in the last months leading up to the outbreak of hostilities in 2003, more well-known and larger sites afterwards (Stone, 2008, p. 135). This seems to suggest that after the collapse of public order, more professional looters targeted sites that would yield antiquities with a "famous" origin and thus, be more marketable. Stone also noted in her report, that three types of archaeological sites were especially targeted—those likely to contain a large number of either cylinder seals, coins, or cuneiform tablets (Stone, 2008, p. 134). These are three categories of small, yet highly saleable antiquities. While the special case of illicit cuneiform tablets is described in more detail in the next section, this theory was recently confirmed for the former two categories by the work of Topçuoğlu and Vorderstrasse (2019). Other scholars have shown that coins generally make up the vast majority of unprovenanced antiquities sold on the internet (Elkins, 2022; Hashemi & Waddell, 2022).

The situation of cylinder seals was examined by Brodie and Manivet (2017), investigating specifically the auction houses Christie's and Sotheby's. They note that Sotheby's seemed to have stopped sales of cylinder seals without provenance almost entirely around 2003, after the numbers of seals for sale at the auction house had gone up for several years leading up to the war. While

Christie's never stopped selling cylinder seals entirely, here, too, a sharp drop in offers is noted. In an earlier study, it had been theorised that perhaps because of negative publicity following reports of looting after the 2003 invasion of Iraq, the legal and financial risk of selling potentially looted objects may have become too high for the auction houses (Brodie, 2011a, p. 118). However, the follow-up study suggests that perhaps Sotheby's decided to stop offering cylinder seals from Syria and Iraq altogether, not mainly because of the fear of being implicated in looting and trafficking, but at least partly because of the poor profitability of this sort of antiquity (Brodie & Manivet, 2017, p. 10). Cylinder seals are small objects and a relatively common finds category in Iraq. Unlike cuneiform tablets, the seals rarely achieve a high price. With the ascent of internet markets it became easier to buy these small items cheaply without going through the trouble of bidding at a major auction house (Brodie, 2017; Brodie & Manivet, 2017). The authors, however, do not discount completely the idea that public outrage may have had an effect. Brodie (2019b) cautions that long-term auction house catalogue data always have to be seen in a larger context to assess the impact of any single outside factor. This case study might, in the context of this thesis, be an example for the possible, or apparent, effects of a public discourse on the antiquities market, but also, the limitations of studying these effects.

Since 2011, Syria has seen some of the worst looting since Iraq in 2003 (Brodie, 2015a, 2022). Studies of satellite imaging (Casana, 2015; Casana & Laugier, 2017; Casana & Panahipour, 2014) document the involvement of all factions in the civil war in the pillaging of archaeological sites. Other studies, including some done by Syrian archaeologists even during the conflict, have given an overview of the situation on the ground, showing that also unaffiliated civilians took part in antiquities looting (Brodie & Sabrine, 2018). In news media, the financing of the terror group Islamic State (IS) through the looting and trafficking of Syrian antiquities, was an important topic (Losson, 2017), especially in the time period between late 2014 and early 2015. Newer studies have since shown that the group's involvement in looting and the antiquities trade has been overstated (Sabrine et al., 2022). The media reporting on this rumour will be an important point of this study (Chapter 4).

Brodie pointed out already in 2015 that the policy efforts around protection of sites in an active war zone was bound to fail when even in peace time usually the resources are too slim to protect sites effectively (Brodie, 2015a). Secondly, he notes that policies that aim to protect endangered sites in conflict, usually come too late to prevent archaeological context from being destroyed, and transnational smuggling networks from developing (Brodie, 2015a). It is notable that the nature of the market is changing, and much of the illicit antiquities trade out of Syria is nowadays happening on internet platforms such as eBay or Facebook as opposed to brick-and-mortar dealerships or

auction houses (Brodie, 2022), and reaching a far broader spectrum of potential buyers. This phenomenon has also been called the "democratization of the antiquities trade" through online trading (Hashemi & Waddell, 2022, p. 218). Since the fall of the Assad regime in December 2024, the future of Syrian heritage is still uncertain. It has been pointed out that Syrian antiquities had been looted and trafficked before 2011 (Brodie, 2022, p. 43; Brodie & Sabrine, 2018), and it stands to reason that the illicit trade with Syrian antiquities will continue. Researchers note that any policies to prevent comparable situations in the future have to be data-driven, transnational, and aimed at a better transparency of the antiquities market (Brodie, 2022; Brodie et al., 2021; European Commission et al., 2019).

The following section discusses in more detail the ethical problems and debates around the handling and study of looted text finds, here predominantly cuneiform texts from Iraq. It is in part based on my own earlier work (Loges, 2022), but updated with some newer contributions to the debate.

2.3.3 The special case of illicit cuneiform texts

When discussing the ethical background of this research, a closer look at the ongoing controversy about the study and publication of illicit ancient Western Asian text finds, such as cuneiform tablets, is inevitable. Unlike other groups of finds, that are generally seen as having lost their historical and scientific value when they were stripped of their archaeological context and handled by traffickers, texts have been argued to still hold scholarly value and grant historical insight through their content alone (Brodie, 2023; Brodie et al., 2021; Brodie & Kersel, 2014; Kersel, 2023b).

Some Assyriologists have argued quite vocally for the study and publication of cuneiform texts found on the international antiquities market even if, and sometimes especially when, they are likely to come from conflict zones (Owen, 2012; Westenholz, 2010). The rationale of this argument is that the history of an ancient site or even part of the heritage of a whole country, otherwise destroyed by conflict and looting, can be partly recovered through the study and publication of their written history (Westenholz, 2010).

Many cuneiform tablets from Southern Iraq, an area which was densely populated since before the invention of writing, but also during the first literate periods from the 4th millennium BC onwards, have been sold on the antiquities market since 1991. There are numerous archaeological sites in this area, both excavated and as yet unexcavated by archaeologists, which have been looted both during the sanctions against Iraq after 1991 and in the aftermath of the 2003 invasion of Iraq.

It seems to be an accepted fact in the discipline of cuneiform studies, that most cuneiform texts which have come onto the market since 1991, have been looted and exported from Iraq illegally

(Földi, 2017; Molina, 2013, 2020). This can be seen by papers in which the author uses data on the post-conflict looting of southern Iraq to guess at the location of a text corpus's city of origin (Molina, 2013, p. 72). The ethical dilemma that studying texts such as these poses, and which is glossed over in Molina's earlier paper, is that antiquities dealers and collectors depend on the endorsement of scholars to authenticate and legitimise their collections (Brodie, 2023; Prescott & Rasmussen, 2020). It has been pointed out that Assyriologists, like other scholars of textual material, tend to see their field of study as an exception, to which the rules imposed on the publication of other archaeological artefacts should not apply (Brodie et al., 2021; Gerstenblith, 2023, p. 139). Yet this category of antiquities is looted and trafficked under the same circumstances as others, and thus doing the same social and intellectual harm. Some organisations have proposed or adopted codes against the publication of illicit texts, but, as with those for other antiquities, the efficacy of these codes remains debated, since their definitions are open to interpretation and they are not accepted by all scholars (Gerstenblith, 2014, 2023; Kersel, 2023b).

Researchers who argue for, and those who argue against, publication of illicit texts, have been entrenched in a bitter debate for years. To mitigate this situation, the International Association of Assyriology (IAA) has put forward the declaration "For an ethical practice in our disciplines", adopted by the IAA general meeting in 2018 and available on the IAA website, which is intended to provide an ethical guideline for students and colleagues. The declaration states that "As philologists, historians, archaeologists and art historians, our ethical behaviour [...] must be applied to the objects of our study". In regard to working with unprovenanced material, the IAA acknowledges the destructive nature of the illegal antiquities trade, but stresses that "the knowledge lost when such objects remain in the dark is also very significant" (IAA, 2018). Ultimately, the declaration stays rather vague. Clearly in reaction to the argument that has been described as "vitriolic" at times even by those involved (Brodie & Kersel, 2014, p. 198), it reminds scholars to stay respectful despite differing positions, while the decision whether to work with unprovenanced material is left to the individual. As such, the document arguably constitutes more of a call for good behaviour than a set of ethical guidelines.

The IAA's apparent neutrality ignores the situation of students and early career researchers. Young academics are under increasing pressure to "publish or perish", and funding for all but the most prestigious research projects is short, Assyriology being no different from other fields of study in this regard. In this discipline, a translation of as-yet unpublished texts is generally seen as a far more prestigious research project than the reinterpretation of already known material. Until relatively recently, regular excavations of archaeological sites have been virtually impossible in southern Iraq. The number of licit new tablets to study is therefore limited, while those of

questionable provenance are more readily available. Consequently, the translations of complete illicit cuneiform archives that have surfaced on the antiquities market after 1991 or 2003 have become a common sight in Assyriological libraries (Molina, 2020, p. 325). The negative ramifications of the trade are less obvious to students. If their instructors do not explicitly encourage critical engagement with these publications, young scholars have little chance to make an informed choice on the ethics of studying these texts. It is notable, however, that in more recent times, younger Assyriologists have started to engage critically with their source material, either declining to include clearly looted texts in their studies (Tsouparopoulou, 2008, p. 25 Footnote 2), or including more thorough study of provenance in the study of the tablets themselves (Földi, 2017). An even more problematic aspect to this than the situation of Assyriology students in Europe and North America, perhaps, is that of their peers in the origin countries of these texts, namely Iraq and Syria. While it has been argued that the knowledge gained through the study and publication of these texts benefits the collective memory of humanity and indeed the cultural heritage of said origin countries (Westenholz, 2010), it is nevertheless notable that the prestige gained by it lies predominantly with experts from the countries into which these texts have been sold (Brodie, 2020). This prestige, in turn, reflects positively upon the private collectors who place "their" illicit texts at scholars' disposal for study and consequently appear as benefactors to cultural heritage (Brodie, 2023).

Additionally, the publication by a cuneiform expert from a traditional market country, as opposed to a scholar national to the source country of the object, arguably takes away opportunities for the latter – especially when it comes to the first edition of an ancient text (Brodie, 2020, p. 94).

A case study from 2019 might illuminate this issue. In March 2019, a British border force officer at Heathrow airport discovered a *kudurru* – a carved stone object typical to the Late Bronze Age Babylonian Kassite dynasty, bearing a royal inscription – in a box labelled "carved stone for home decoration". To confirm the suspicion that the artefact was indeed a smuggled antiquity, experts from the British Museum were called. An Assyriologist with the museum subsequently not only authenticated, but also translated the text inscribed on the *kudurru*, before it was repatriated to Iraq (Simpson et al., 2020). The issue of first publication has also been raised in the case of the Hobby Lobby tablets, above. Many of these texts have been repatriated only after their publication and therefore, can be argued to have lost some of their scholarly value for study in the origin country (Brodie, 2020, p. 101). The translation then usually becomes the intellectual property of the translator, which again can take away opportunities from scholars in origin countries, while affording them to scholars in the countries where the texts have been trafficked to.

There is as yet no satisfying solution to this scholarly debate, nor does there seem to be much willingness to find one, as long as cuneiform texts still have a special appeal to some collectors, who, like Martin Schøyen, wish to amass collections of the written word (Brodie, 2011b, 2023; Metzgar, 2024) or, like the owners of Hobby Lobby, physical evidence from supposed "biblical" times (Brodie, 2020; Yates, 2017) and some scholars stand to profit from this circumstance (Brodie, 2023).

The following section introduces the sociological concept of moral panic. I use this concept to elucidate some of the changes in the discourse on antiquities trafficking over the researched time period, which, like the market for Iraqi and Syrian antiquities, are also informed by the perception of Western Asia in countries such as Germany.

2.4 Moral Panic

Over the time period this study is focused on, the media representation of this market in Germany has undergone some notable changes. The most recent development in this regard is the close association of the looting and destruction of cultural heritage in Western Asia with the terrorist group Islamic State (IS), and by extension, the association of the international antiquities trade with terror financing and organised crime (see Chapter 4). The public outrage created by this perceived connection is hypothesised here to have had significant effects on the German antiquities market – if not necessarily in the form of reduced trade. This section weighs the question how the shifts in media representation of the illicit antiquities trade have impacted the market in Iraqi and Syrian antiquities in Germany.

One development seemingly following outraged media reports and subsequent calls for action is Germany's Cultural Property Protection Law (*Kulturgutschutzgesetz*, KGSG) of 2016. The law itself has received significant media attention and criticism, not least from the side of market actors and lobbyists. The concept of "moral panic" is used therefore in the present study as a theoretical framework to understand how shifts in the representation and public perception of conflict and cultural looting in Iraq and Syria have influenced the market for "Mesopotamian" – that is, most likely Iraqi and Syrian – antiquities in Germany. The following sections introduce and explain the theory of moral panic, and how it relates to the research goal of this study.

2.4.1 The concept of moral panic since 1972, criticisms, and use in this thesis

Moral panic, as defined by British sociologist Stanley Cohen in 1972 (3rd Edition Cohen, 2002 [1972]), describes the reaction of mass media and the general public to a perceived threat to societal

norms, and the social changes that result from this reaction. The people held responsible for this perceived threat are called "folk devils" in the original publication, a term adopted by most other scholars dealing with moral panics. Cohen identifies five stages of moral panic:

- 1 A group, person, or behaviour is defined as an immediate threat to society,
- 2 this perceived threat is then depicted in simplified and exaggerated form by mass media,
- 3 the media portrayal rouses public concern and calls for action against the threat,
- 4 there is a response from authorities and policy makers to these calls, and
- 5 social changes result from the moral panic, which subsequently dies down.

Cohen's original study dealt with British youth cultures of the 1960s and the "Mods and Rockers" phenomenon, but it can be applied to a range of issues. For example, two well-known examples of "folk devils" given in the introduction to the third edition of Cohen's work, underage single mothers dependent on social benefits, so-called "welfare mums" (Cohen, 2002, p. xx), and so-called "fake" refugees (Cohen, 2002, p. xxii), are recurring media phenomena even to the present day. A crucial characteristic for a folk devil is that they should belong to an already marginalised or vilified group (Garland, 2008, p. 14). However, sometimes the outrage extends to people and institutions held "ultimately responsible" for the problem, such as supposed financial or political elites (Cohen, 2002, pp. xxvi, xxvii). This should be kept in mind as a crucial point for the present study.

The concept of moral panics has been further refined by American scholars Erich Goode and Nachman Ben-Yehuda, who defined some elements present in any moral panic (Goode & Ben-Yehuda, 2010, 2011): a heightened level of *concern*, a feeling of *hostility* towards the group held responsible, a certain level of *consensus* about the issue, a *disproportionate* response by media and the public, as well as *volatility*, meaning that any moral panic is by nature short-lived, even if it may occur repeatedly. Identifying these elements in the reaction to looting and trafficking of antiquities, specifically in the context of armed conflict, helps to explain shifts in the public view over time. Since its original publication, the concept of moral panic has become popular in commentary on and criticism of certain media representations, so much so, that a sociological sub-discipline of "moral panic analysis" has been postulated (Garland, 2008).

Critcher (2008, 2017) has named the two approaches of Cohen and Goode and Ben-Yehuda, the "processual" and the "attributional" model of moral panic analysis, since Cohen follows the development of the moral panic, while Goode and Ben-Yehuda identified necessary characteristics. In combination, both models can help to pinpoint if and when a public discourse becomes a moral panic, and which social consequences result from it. Therefore, in this study I opted for a combined processual and attributional model, in which I followed the media discourse over the researched time period, mapping it onto the stages of moral panic following Cohen, and at the same time kept

track of which of the markers of moral panic following Goode and Ben-Yehuda could be identified in the articles. With this approach I can make a more consistent case for the existence of a moral panic, and also more easily identify its characteristics, and who the "folk devils" are.

The concept of moral panic has also been criticised. As early as in the 1990s, it has been argued that in a modern media landscape, moral panics are less all-encompassing than they were before, and their targets are much less marginalised (McRobbie & Thornton, 1995). While the latter might be true for youth cultures, which can have some sway in popular culture, some other targets of moral panics still have little backing in mass media and are universally disparaged, such as the above-mentioned "welfare mums". This can be explained by these groups' lack of an active lobby, or any other means to harness media power, which makes them, in Cohen's words, a "suitable enemy" (Cohen, 2002, p. xii).

Another criticism the concept of moral panic has faced is that it is too pejorative a term and used to make light of genuine public concerns. Additionally, since the term moral panic itself has been taken up by news media and used to ridicule opposing views, it has been argued that it has become over- and misused (Hunt, 1997). In media studies, it has been pointed out that media outlets themselves tend to use the term to invalidate the arguments of an "opposite side" in an issue (Altheide, 2009). It should be noted for this thesis, that this ubiquitous use of the term is mainly limited to the English language.

It has to be stated here that, at least as used in this study, the term "moral panic" does not imply that a problem is not real or that it is not serious. As Garland (2008, p. 13) notes, the problems that moral panics react to "may turn out to be serious, trivial, or a figment of the imagination" (for example, the early modern witch hunts in Europe and North America can be classified as a moral panic according to this scholar, but so can anxieties about threats such as mugging and sexual child abuse). It does indicate, however, that the issue has been exaggerated and distorted in the public view and will therefore be met with some wrong conclusions. This point is already made in Cohen's 2002 third edition of his original work (Cohen, 2002, p. vii). My use of the concept here mainly implies that the above-mentioned features of a moral panic, both the stages defined by Cohen and the elements defined by Goode and Ben-Yehuda, can be identified in the public and media reaction to the issues studied, and that there are clear signs of media exaggeration and misrepresentation.

2.4.2 Antiquities trafficking in the media: myths and misconceptions

Media exaggeration and distortion are essential factors in a moral panic. In the context of this research, this means that some popular narratives used in news media reporting about antiquities trafficking will be analysed in the following chapters.

These are in particular: Antiquities trafficking as a major funding source for terrorist groups and/or organised crime, the illicit antiquities market being the third-largest illicit market in the world, and to a lesser extent looted antiquities being used for money-laundering. These narratives have now been more or less debunked in academic literature (Brodie & Yates, 2022; Sabrine et al., 2022; Yates & Brodie, 2023), yet they dominated more general media on antiquities trafficking for a time, enough to make an argument for a moral panic. Therefore, they are discussed briefly in this section to set the scene for the analyses in the following chapters.

During Syrian civil war looters of antiquities were more and more conflated with the Islamic State (IS) terror group by international and German news media. This afforded audiences an easier way to condemn these individuals than if they had been portrayed as "subsistence diggers", or belonging to rebel groups generally seen as "pro-democratic". It has since been shown, however, that the involvement of the terror group in looting activities has been overstated in the public discourse, and other factions, as well as unaffiliated looters, have been involved in them, too (Sabrine et al., 2022). It is possible that the close link of antiquities trafficking with terror financing in the media was partly made because of the reputation as annihilators of cultural heritage the IS terrorists have created for themselves (Smith et al., 2015; Stein, 2022).

It can also be said that there already was a recurring moral panic associated with terrorism, even before the rise of IS. It was triggered by the attack on the World Trade Center in 2001, and fuelled by subsequent, widely reported terror attacks in different countries. Several researchers have pointed out that the drastic and far-reaching response to the 9/11 attacks show the markers of moral panic (Goode & Ben-Yehuda, 2010, p. 37; Rothe & Muzzati, 2004). Especially in the first years following this attack, media outlets often followed the martial rhetoric of official statements and speeches by politicians when reporting on terrorism (Rothe & Muzzati, 2004), for example, by adopting almost unquestioningly the somewhat cryptic phrase of the "War on Terror" (Reese, 2009). Yet terrorists also use media attention for their own recruiting and propaganda goals. It has been argued that, in addition to the moral entrepreneurs and social control agents usually acting in a moral panic, they can be agents of moral panic themselves (Walsh, 2017). This includes the destruction of cultural heritage for shock value and propagandist causes: already the destruction of the Buddha statues of Bamiyan in Afghanistan by the Taliban in 2001 can be seen as a form of

cultural heritage destruction geared to attract international media attention (Smith et al., 2015). Newer examples for this kind of media spectacle include IS's depiction of the destruction of cultural heritage in Iraq and Syria through social media. Thereby, they were utilising the response to their actions for what has been called "socially mediated terrorism" (Smith et al., 2015). In this sense, the above-cited argument of McRobbie and Thornton (1995), that "folk devils" can make use of the moral panic for their own ends, does hold water, and even more so today, in a much-diversified media landscape. It should be kept in mind that, the fact that the terrorists themselves have become agents in this moral panic, does not necessarily mean that it is not taking place.

If not for terrorists, the illicit antiquities market is sometimes rumoured to be an important financing tool for organised crime (Hilgert, 2015). Antiquities trafficking itself has also been described as a form of organised crime (Brodie, 2019a; Kersel & Gerstenblith, 2025). Research supports this notion to an extent (European Commission et al., 2019), if not necessarily in the sense that the trafficking is overseen by one specific criminal gang or syndicate (Dietzler, 2013). Those can have a hand in antiquities trafficking (Mackenzie, 2011b; Mackenzie & Davis, 2014), but in most cases, it rather constitutes a loose collaboration of individuals fulfilling different roles in the same criminal market (Brodie, 2019a; Mackenzie & Davis, 2014).

Two other mainstays in the reporting on antiquities trafficking are the ideas that the illicit antiquities market constitutes the third-largest illicit market worldwide, and that trafficked antiquities are used for money-laundering purposes. Especially the former of the two narratives directly reflects the exaggeration that is a necessary part of a moral panic. It has been around for so long that it has become, essentially, a factoid, as pointed out by Yates and Brodie (2023). The actual monetary value of the illicit antiquities trade as a whole is impossible to assess, and irrelevant to the severity of the harms done by antiquities trafficking (Yates & Brodie, 2023, p. 1001). The idea of money-laundering through trafficked antiquities has likewise been discredited, as antiquities that have been looted and trafficked need to be laundered themselves (Brodie & Yates, 2022).

For the purpose of determining a moral panic, all of these rumours should be kept in mind. Moral panics depend on an exaggerated feeling threat, which can be expressed in linking more crimes or deviances to the one that the moral panic is actually about (Kersel & Gerstenblith, 2025). Cohen (Cohen, 2002, p. 52) calls this "It's Not Only This". The following section outlines how moral panic theory was used in this research project to determine whether a moral panic about cultural heritage has taken place in Germany in the researched time period, and if so, what its main characteristics were.

2.4.3 Moral panic theory as applied in this thesis

As outlined in Chapter 1, one of the main research questions this thesis seeks to answer is whether the public and media discourse on antiquities trafficking in Germany can be called "a moral panic about cultural heritage". To achieve this goal, I follow the unfolding of that discourse in German-language newspapers' response to looting and trafficking of antiquities from Iraq and Syria between 1991 and 2021 (however, as will become clear in Chapter 4, the articles mainly come from the years between 2003 and 2020). I analyse which of the defining elements of moral panic are present in the discourse (and when), who is the target of the moral panic, and which social consequences have resulted from it.

It could be argued that the public response to the rumours of antiquities trafficking by IS terrorists was one facet of the general fear of terrorism in society. However, one proposition I make in this thesis is that the fear of losing irreplaceable objects of universal cultural significance and carriers of unique historical information can be seen as a moral panic as well. Not least the orientalist narrative of a dichotomy between a "civilised West" (where Western Asian cultural objects are conserved and appreciated) and a supposedly "barbaric East" (where terrorists destroy those same objects) would make it into a moral panic about heritage protection.

Even if the fear of heritage destruction can be shown to be a separate moral panic to the fear of terrorism, I argue that the two are interlinked. This question is especially salient with regards to who the "folk devils" are. As Cohen points out, the moral outrage and hostility in a moral panic is not always directed only against the obvious group of people held responsible, such as for example, criminal youth, but also social actors held "ultimately responsible", such as ineffective politicians or passive law enforcement officers (Cohen, 2002, p. xxvi). In the case of the supposed IS-antiquities connection, this would be antiquities dealers who trade in IS-looted artefacts and thereby, allegedly help fund the terror group and their crimes against both humans and heritage. It might be cautioned then that since the heritage sector is a specialist field, the concept is not applicable, because a moral panic should have an effect on society as a whole, but I argue that effects such as new legislation are enough to qualify at least as an effect on a significant part of society. It should be kept in mind here that moral panics can come in different sizes (Garland, 2008, p. 13).

My other two research questions concerned the effects that conflict-related looting of Iraq and Syria had on the antiquities market, and society more generally, in Germany. This is based on the finding that, even if a moral panic is short-lived, it usually has some sort of legacy (Goode & Ben-Yehuda, 1994). In the present study, the legacy that was investigated is the lasting impact of the media

reports of looting and the subsequent public discourse. Through this, this study aims to shed light on the ways in which the antiquities market can be influenced, and how policy makers should react to media attention on looting and antiquities trafficking.

To understand whether the changes in media perception are indicative of a moral panic, I first used the method of news framing analysis on German-language newspaper articles, focusing on the markers and elements of moral panic. Through this, key trends and themes in the news reporting on antiquities trafficking can be identified, which are then contextualised with legal developments and market reactions. My complete methodology is described in more detail in the following chapter.

3 METHODOLOGY AND METHODS

This chapter explains the methods chosen to address the research questions raised in Chapter 1 and the reasoning behind those choices, as well as my selection of data and how I analysed them. The data analysed with these methods form the basis for the discussion of whether the media, legal, and market discourse about illicit Western Asian antiquities in Germany between 2003 and 2021 can be argued to be consistent with a moral panic.

3.1 Introduction to Methods

In order to gauge the impact of conflict on the market in illicit Western Asian antiquities, one has to consider the ways in which the ends of the trafficking chain interact. It has been speculated (Brodie, 2011a; Brodie & Manivet, 2017) that public opinion, influenced by news media, can have an effect on the market in illicit or unprovenanced antiquities. It is less clear, however, of what nature this effect might be, exactly. Public outrage can sometimes inspire a moral panic, which then can lead to changes in society (Critcher, 2008, p. 1130; Goode & Ben-Yehuda, 1994).

This thesis concentrates on analysing the German-language media, policy development, and market discourse of antiquities looting and trafficking from 1991, but more specifically, from 2003 until 2020, to identify whether a moral panic did take place in this time period, and if so, which societal changes resulted from it. To achieve this, I roughly followed the stages of a moral panic as defined by Stanley Cohen (2002), an approach that has also been called the "processual" model of moral panic analysis by Critcher (2008, 2017). This means, I first analysed the media portrayal of antiquities trafficking in Germany between 1991 and 2021 as the main part of my data, following the development of the news reporting during that time. I complemented this approach with Goode and Ben-Yehuda's (2011) "attributional" model of moral panic analysis by identifying which elements of moral panic were present in the newspaper articles.

I then contextualised the results of the media analysis with the legal changes made during this time period—the lawmaking process, and reasons given in official statements for the changes—and finally, with the reactions by antiquities market actors to both the media portrayal of their trade and profession, and to legal changes that might affect the market. The two methods I used for this threefold approach are news framing analysis for the media analysis, and coding for the contextualisation of it with both legal changes and market reactions. Both of these two analytical approaches will be discussed in more detail further below. The following section first explains the data I gathered as the basis for my analysis.

3.1.1 Source selection: Media analysis

For the purpose of determining a moral panic dealing with the German market in illicit Western Asian antiquities, and affecting specifically the German population, I analysed the media representation in German-language print newspapers. While the discourse analysed in this thesis certainly took place in other forms of mass media as well, I selected newspaper articles as my main source. One reason for this is that changes in lexical choices over time are most easily followed in the written word. As the lexical choices made by journalists are at the heart of my news framing analysis, explained in more detail below, newspaper articles presented themselves as the obvious choice. While an analysis of this discourse as it happened on social media would also have been worthwhile, the nature of social media posts, as well as sheer amount of data would have necessitated a different set of methods and, as such, exceeded the scope of this thesis.

I concentrate on an analysis in German because, while the target audience might be able to read English or other languages, I see it as safe to assume that newspapers in German are read most often. The articles chosen for this media analysis mainly come from national German newspapers, although a few examples of other German-language publications from Switzerland and Austria are included, whose partly different outlook is marked in the analysis. Fig. 4.1, which shows the overall timeline has these publications marked. Additionally, some articles from local newspapers were included. Because these reach a smaller, more regional audience, the way in which they contribute to a moral panic may differ from publications with a wider range. This is noted in the analysis and also marked in Fig. 4.1.

The articles were located by employing targeted searches on the international newspaper database Nexis, using the three search terms *Raubgrabungen* ("looting"), *Antikenschmuggel* ("antiquities smuggling"), and *Antikenhehlerei* ("antiquities fencing"). Narrowing down the search results to articles pertaining to Western Asian and Afghan antiquities left 75 articles in total, which were analysed in detail for this study (see Appendix A. 1). Further searches with slightly different search terms might have yielded a larger number of articles, but I see this number of articles as sufficient for my research, because these are the predominantly used terms for the looting and trafficking of antiquities in German. Therefore, I believe that the majority of articles on the topic of antiquities trafficking published during the time period I researched were detected with these search terms. It should also be noted that my analysis only requires a representative sample, not an exhaustive one. Rather than keeping the found articles separate according to their search terms, I decided to compile them into a timeline of news. I did this in order to assess the changes in the representation of the antiquities market in German newspapers over the time period researched.

3.1.2 Sample selection: Legal changes

One characteristic of moral panic often is a call for authorities to act to eliminate the perceived threat, and thus, to implement stricter laws against the behaviour that causes the offense. Thus, to determine if a moral panic took place any new laws dealing with antiquities trafficking adopted in Germany during the researched time period, have to be seen in context with the media discourse on the topic. For the contextualisation of the media analysis with legal developments during this time, I analysed five legal texts I deemed most relevant for the topic based on their direct relevance to the changes in cultural property legislation in Germany and how these were communicated to the public by lawmakers. These were the text of Germany's *Kulturgüterrückgabegesetz*, the law that had been adopted to implement the UNESCO convention in 2007, its official evaluation report, published in 2013, as well as three texts pertaining to the 2016 amendment of the former law: The word protocol of the public cultural committee meeting prior to the final adoption of the 2016 *Kulturgutschutzgesetz* KGSG (Ausschuss für Kultur und Medien, 2016), the KGSG's final text (KGSG, 2016), and the associated press release announcing its adoption (*Die Neuregelung des Kulturgutschutzrechts*, 2016). I limited my dataset to these five texts because they are official documents directly relevant to the lawmaking process. The latter three of these texts, which deal with the 2016 law amendment, I also analysed in more depth to contextualise the key themes emerging from the media analysis. The protocol of the cultural committee meeting before the adoption the 2016 law amendment is by far the longest of the three texts analysed in the context of the amendment. I deemed it especially useful for my study because it contains detailed statements of different stakeholder groups in the debate around this legislation. Therefore it is used to show how the themes from the media portrayal of the issue of antiquities trafficking are reflected by these stakeholders, if at all. The law itself, and the press statement issued upon its adoption, were analysed to show how they reflect the media themes, but I also studied them to see which stakeholders' demands were most recognised by the lawmakers.

3.1.3 Sample selection: Market reaction

A moral panic, while usually short-lived, always has some lasting impact on society (Goode & Ben-Yehuda, 1994). Thus, in a moral panic, about antiquities trafficking, it stands to reason that the antiquities market would be most affected, and react to potentially negative press. To assess this, I analysed texts by market actors on the media representation of antiquities trafficking, as well as changes in legislation that might affect the antiquities trade.

I chose a number of publicly available statements from antiquities dealers' associations and antiquities market-friendly publications to make the media trends and themes visible in the market reaction. I analysed them in the same way as the three texts associated with the 2016 law amendment. These were texts published after the amendment, partly in reaction to the new legislation, as well as in reaction to the government-funded ILLICID project researching the German market in Eastern Mediterranean and Western Asian antiquities, and the general legal situation of the German antiquities market post-2016. The sources for these texts were the website of the International Association for Dealers in Ancient Art (IADAA), the German umbrella association *Interessengemeinschaft Deutscher Kunsthandel*, which was founded in direct response to the 2016 law amendment (Kunsthandel, 2019b), as well as the online magazine Cultural Property News (culturalpropertynews.org), and the coin collector's forum Coins Weekly/*Münzenwoche* (<https://new.coinsweekly.com/>).

These texts were all analysed to see in how much they reflect the key themes of the media analysis. The IADAA website (iadaa.org) makes their materials available in both English and German. I favoured the German-language version of the website wherever possible to better be able to identify potential recurring phrases from the media analysis and the legal texts.

Additionally, I read and compared antiquities dealers' responses to the public consultations held for two newer EU regulations on the import and trade in antiquities, which were adopted in 2017 and 2021. The public accessibility of these statements made it possible to contextualise reactions to the public outrage directed at the market and changes in legislation, and to illuminate how the market wants to publicly portray itself in light of the discourse on conflict antiquities.

3.2 Media Analysis

The way media portray a social issue is a crucial factor in making a moral panic happen, following the "processual" model of moral panic (Cohen, 2002, p. xxvii; Critcher, 2008, p. 1129; Garland, 2008, p. 15). In the "attributional" model, the media have been identified as one of the earliest "social actors" to express concern in a moral panic (Goode & Ben-Yehuda, 2011, p. 47). Therefore, my first step of determining whether a moral panic was taking place was to analyse the way German media were portraying, or representing, the issue of antiquities trafficking from Western Asian countries from 1991 to 2021.

There are several possible ways to study the representation of a topic in news media. Representation here is the way language, signs, and images are used to convey a topic to an audience who does not directly witness it (Cohen, 2002, p. 9; Hall, 1997). The specific method I chose for this analysis is

called news framing analysis (Entman, 2004). It can be used to understand how a topic is presented to an audience, and which interpretations are suggested, by analysing the lexical choices that are made, that is, the words and phrases used (D'Angelo, 2017).

3.2.1 News Framing Analysis

News framing analysis is a way to study media reports by assessing which words and images ("framing devices") are used to put current issues and events in a specific context, or frame. Framing has been described as a means journalists and other communicators use to define problems, make moral judgements, and possibly suggest or support solutions (Entman, 1993, p. 52; Entman et al., 2009, p. 176). Frames are phrases or images used to convey a message, often familiar to the audience, to elicit a similar response (D'Angelo, 2017; Entman et al., 2009, p. 177; Van Gorp, 2009, p. 86). In journalism specifically, frames are a tool "to turn events into news stories" (Van Gorp, 2009, p. 84), that is, to explain them in a way that appears both interesting and relevant to the audience, by highlighting certain aspects that define a problem and its cause (Entman, 1993, p. 52), in order to make the audience think about, and possibly re-evaluate the topic at hand (D'Angelo, 2017, p. 2). In other words, framing can portray an issue, such as antiquities trafficking, in a certain light that highlights certain aspects and suggests a certain interpretation (Entman, 1993). Framing analysis is, within journalism studies, often used to answer questions of the underlying assumptions and intentions of the authors, as well as the effects of news framing (D'Angelo, 2009). I see news framing analysis as a fitting methodological approach for the present study because it sheds light on how news reports portray antiquities looting and trafficking to their audiences, and which moral interpretations they explicitly or implicitly suggest. In the context of moral panic, this can mean invoking an emotional response to a problem that is portrayed as a threat to society. It is important to keep in mind that framing does not necessarily imply active media manipulation. Often, a frame functions as a way to describe a problem by—intentionally or unintentionally—stressing those aspects of it that the author deems suitable to explain and find a solution for it by calling on the culture they assume to share with their audience (Van Gorp, 2009, p. 85). Frames, as Van Gorp lays out, reflect the shared cultural values and norms of journalists and their audiences (Van Gorp, 2009, p. 85). Framing analysis is therefore a practical way to identify the cultural values called upon by journalists to explain, e.g., the problem of looted antiquities to their audience. The values journalists appeal to are also crucial for this study when compared to the values put forward by antiquities market actors and discussed in the later chapters.

The presence of a frame is indicated by so-called framing devices, i.e. specific words, metaphors or parts of images (Reese, 2009, p. 19; Van Gorp, 2009, p. 91). For this study, I concentrated on the lexical choices, that is, the words used to describe the topic. The way a person is described in a text can also be a frame. For example, so-called archetypes, such as the villain or the victim, are “culturally embedded”, therefore widely understood, frames (Van Gorp, 2009, p. 86). Considering these archetypes is useful when analysing how various actors in the antiquities trade are evaluated morally, especially in the context of a moral panic. The "villain" for example, could also be called the "folk devil". I give special attention to the words used to describe the different actors along the antiquities trafficking chain and their actions, but also, to those that describe antiquities themselves. The choice of words for these persons and objects, in my view, can reveal a lot about how they are evaluated by the media over time.

I analysed the 75 articles in chronological order, so as to better identify the progressive stages of a moral panic, following the "processual" model of moral panic analysis, put forward by Cohen (2002), as I found this approach most useful to contextualise the media analysis with other developments in the researched time period (explained in more detail in Chapter 2). Additionally, ordering the articles chronologically can show two of the five elements of moral panic from the "attributional" model following Goode and Ben-Yehuda (2010, 2011), which I also identified to complement my approach: The first being *concern*, reflected in the number of articles dedicated to a topic spiking suddenly, the other *volatility*, when that number abruptly drops, with searches yielding only few or no articles with the defined search terms anymore. The finer interpretation of the reporting, however, demands a closer analysis than just that of the number of articles. Therefore, each of the found articles was first analysed individually, before being ordered into a timeline of news. The in-depth analysis of the lexical choices made in the reporting about antiquities trafficking also sheds light on the presence of the remaining three of the five key elements of moral panic defined by Goode and Ben-Yehuda (2010) namely *consensus* among the writers about the supposed threat, *disproportionality* in the description of the threat, and *hostility* towards those deemed responsible.

3.2.2 News Framing Analysis — Template

For the purpose of this news framing analysis, I used the template laid out below. I developed it by adapting the method put forward by Dr. Leonhardt van Efferink during the Maastricht University summer school course "Media Representation and Research Methods", which I took part in during August 2020. This method is based on the work of Robert Entman (Entman, 2004) and builds upon

research questions geared towards the framing of the investigated news piece. The questions used in the media analysis differ from the research questions for the whole thesis, because they are specifically dealing with the media's treatment of antiquities trafficking in terms of a moral panic. The main research question (MRQ) for the news framing analysis is answered by first addressing a number of contributory research questions (CRQ's), which break the MRQ down into smaller steps. The CRQ's are in turn answered by help of operational research questions (ORQ's) which directly address the wording of the analysed article.

The individual framing analyses of these 75 articles can be found in the Appendix (A.1), ordered chronologically, with limited commentary. Some of the lexical choices of the writers were translated and explained by me, so as to better explain my reasoning. Additionally, I used the method put forward by Van Gorp's procedures of analysis (Van Gorp, 2009) to identify the frames present in the article, and to understand which framing devices are employed.

Research Questions:

According to the method I use in this thesis to analyse which frames and framing devices are present in the text, and how they are employed, a main research question (MRQ) is asked to explain the theoretical concept (moral panic) in conjunction with the topic of the article.

Main research question (MRQ):

How is "[ARTICLE]" framing the market for illicit antiquities in Germany in terms of a moral panic in [TIME FRAME]?

To answer the MRQ, contributory research questions (CRQs) about the text needed to be addressed first. They help to break down the MRQ into smaller steps and thus make it possible to show different aspects of how the article is framing the individual news story.

Contributory research questions:

CRQ 1: Who is held responsible for the loss of cultural heritage?

CRQ 2: Which elements of moral panic are visible?

CRQ 3: Which orientalist tropes are used?

CRQ 4: How is the antiquities trafficking chain constructed in this article?

These contributory research questions are all understood within the context of moral panic: The first helps identify the "folk devil", that is, in the case of a moral panic about antiquities trafficking, the people responsible for it, the second directly addresses the elements defined by Goode and Ben-Yehuda (2010). The third aims to identify whether an element of orientalism, as defined by Said (2003) can be argued to be present in the frames used. It has been suggested that orientalist narratives have long been a part of Euro-American engagement with Western Asian archaeology and antiquities (Bahrani, 2011, 2018). Addressing this question thus might help understand the

general view on the problem of antiquities trafficking by the writers, keeping in mind that they would use narratives which they assume their audience to be familiar with (Entman et al., 2009; Van Gorp, 2009). The last question is asked to understand how much emphasis the authors put on the details of the antiquities market, which are often more complicated than can be said in a short news piece. However, the way in which it is summarised can give an impression of how the authors understand what is happening, and thus, give hints as to how pressing they see the threat (*concern*) and who they hold responsible for it (*hostility*). Another element of moral panic that can be seen from this question is *consensus*, which would be the case if all or most authors understand the antiquities trafficking chain in the same way.

In the sample of 75 news articles analysed in the media analysis chapter, sometimes, some or even all of these contributory research questions could not be answered, when there is no indication of a frame that is concerned with the above-mentioned matters. This generally means that there is no indication of a moral panic in the article, not even in the form of a backlash toward the moral panic. Yet even the absence of these frames, especially when taken in the context of other articles and the point in time, can be instructive.

To find out if the targeted frames are present, the contributory research questions in turn are informed by operational research questions. These are aimed directly at the lexical building blocks of the article, that is, the words used to portray an actor, a situation or an issue in a certain way.

Operational Research Questions:

ORQ 1: Which words are used to describe *looting at source*?

ORQ 2: Which words are used to describe *the antiquities market and market actors*?

ORQ 3: Which words are used to describe *antiquities*?

ORQ 4: Which devices are used to get/keep the reader's attention?

In order to get a clear picture and keep my findings comparable over the large sample size, I have used very simple and straightforward ORQs for my analysis. They concentrate on the lexical choices made for the actors involved in looting and trafficking, as well as the object, that is, the antiquities themselves. The last ORQ is concerned with words that could be employed in hopes to grab the attention of casual readers and keep them engaged with the topic at hand. These can be indicators for a moral panic, such as disproportional figures given for the antiquities market, or connections to terrorism and organised crime. Some of these lexical choices may even invoke orientalist tropes, and are then used to help answer the contributory research question CRQ 3.

3.2.3 News Framing Analysis — Example

This section gives an example of news framing analysis with an article on the topic of antiquities looting and trafficking during the Syrian civil war. This is done to demonstrate both the analytical method that was used on the entire corpus of news articles studied, and the reasoning behind the conclusions I draw. Some elements of moral panic cannot become visible through one article alone, namely consensus and volatility. That means, while certain elements of moral panic may be identified in this or any singular article, a larger sample size is needed to see the progressive unfolding of a moral panic in the media, as discussed above. This was done for the main part of the media analysis with the 75 articles, which I found on Nexis.

While this main part of the media analysis is focused on publications in German, the following example of my method shows the analysis of an English language article, to make the reasoning behind my conclusions more transparent to the reader. Some of the research questions in this analysis differ from the ones used for the general analysis. They are specific for this article, while the overall analysis uses the same questions (following the template above) for all articles.

The article, “How Western art collectors are helping to fund Isis”, was published on the website of The Guardian newspaper on February 26th, 2016 (Amineddoleh, 2016). It is a background piece written by an expert in cultural heritage law, rather than a regular news report written by a journalist. Quotes of, interviews with, and whole articles written by experts, such as archaeologists and lawyers, are relatively common in the media portrayal of antiquities trafficking also in the German-language press, as can be seen in the appendix of this thesis. I chose this article as the data source for this example because these longer and more in-depth texts can show a clearer picture of how their authors see and present the issue of antiquities trafficking than a short news report, and also yield a larger variety of lexical choices. The article belongs to a group of texts concerned with the responsibility of the collectors of artefacts from conflict regions for heritage destruction and possibly the funding of terrorism in Syria that were published between late 2014 and 2016. I believe The Guardian, as one of the most widely circulated British newspapers, to serve as an adequate source for mass (print and online) media representation of events in Syria.

Research Questions:

Like in the template discussed above, the framing analysis has one main research question (MRQ), answered by help of contributory and operational research questions. In this case, the MRQ is:

"To what extent is the international antiquities trade framed as the cause for moral panic in the article from 26 Feb 2016 in the Guardian newspaper?"

The Contributory Research Questions (CRQs) are:

CRQ 1: "How is the terror group IS represented in the article?"

CRQ 2: "How is the antiquities trade linked to IS in the article?"

CRQ 3: "How are the looters of antiquities portrayed?"

CRQ 4: "How are buyers of antiquities evaluated morally in the article?"

Operational research questions (ORQs) are in turn employed to help answer the CRQs. They differ from the template shown above because they are geared more closely to this article.

ORQ 1.1: "Which words are used to describe the buyers of antiquities?"

ORQ 1.2: "Which words are used to describe the looters of antiquities?"

ORQ 1.3: "Which words are used to describe the other actors in the antiquities trade?"

ORQ 1.4: "Which words are used to describe the terror group IS?"

ORQ 2.1: "Which words are used to describe the situation of antiquities looting in Syria in 2016?"

ORQ 2.2: "Which words are used to describe the antiquities trafficking chain in 2016?"

The findings, answering first the ORQ's, then combining these answers to help answer the other research questions, are as follows:

ORQ 1.1: "Which words are used to describe buyers of antiquities?"

The headline of the article describes the buyers of antiquities as "Western art collectors".

The term "Western" suggests a dichotomy between the so-called "West", i.e., North America and Europe vs. the "East", i.e., Western Asia. This framing device can reflect the orientalist stereotype of a civilised, democratic society in contrast to the "barbaric" situation of countries that struggle with terrorism and instability. This is an often-used dichotomy to set apart former colonising from formerly colonised countries (Said, 2003). The term "art collector", meanwhile, carries connotations of wealth and sophistication, suggesting a high status in society. Putting these terms next to "Isis", another word for the terror group IS and with it the epitome of the "barbaric East" at the time of this article's publishing, creates a contrast clearly meant to catch a casual reader's eye, thus calling into question the stereotype of the sophisticated, "civilised" art collector. It should be noted here that the headline of an article, especially in online newspapers, is rarely written by the author themselves, but rather an editor. This is done to entice casual readers to click on the piece, but also for reasons of space constraints on the website. This is to say the term "Western" may carry different connotations in the main text than as used in the headline. As can be seen from the analysis of the main text, I assume this was also the case in this article, where the language shifts noticeably to a more nuanced choice of words.

The abstract and first sentence of the main text both use the metaphor of a "Western appetite for antiquities". The antiquities are thereby likened to food about to be consumed. In this combination the word "Western" seems to carry a more negative connotation than in the headline, invoking a

frame of colonial greed. When buyers are described as "individuals who pride themselves on their appreciation of cultural heritage", this shows sarcasm as a framing device, because the second half of the sentence describes the negative consequences the buyers' actions have for cultural heritage. In legal terms, "individual" usually means a single person, as opposed to a group, class, or corporation (Black's Law Dictionary, 2011; The Law Dictionary, 2014). The expression "individuals" therefore may imply individual responsibility, especially keeping in mind that the author is a lawyer.

"Buyers are either unaware of the damage caused by the black market, feel callously unconcerned that their purchases lead to destruction, or justify their actions believing that they are "saving" objects from conflict zones". While the possibility of ignorance and *bona fide* purchases of looted antiquities is acknowledged, the framing device "callously unconcerned" suggests a bad character, while "justify" suggests a guilty conscience. The fact that "saving" is put in quotes here implies sarcasm again.

"Some collectors are uninformed about the buyer's instrumental role in the looting mechanism and the harm that their purchases create." This sentence again concedes the possibility that some buyers might not do harm intentionally. But the author also advises that "purchasers should buy objects from reputable sources". The mention of "reputable sources" implies the existence of sources that are less than reputable. The affirmation that "loot appears on the markets in New York and London" reminds the audience that the antiquities trafficking chain ends in their own countries. It is cautioned that "unscrupulous buyers will purchase loot" even if laws become stricter. When the author cautions that "[b]uyers may be rightfully haunted by their purchases", she implies that any negative consequences that arise from buying looted artefacts are justified. The frame applied here may be the archetype of the villain about to get his or her just comeuppance.

ORQ 1.2: "Which words are used to describe looters of antiquities?"

The people who actually take artefacts out of the ground are described as "impoverished, unemployed locals" who "loot objects to support and feed their families" and "paying Isis a tax on artefacts leaving its territory". These people clearly are not cast as the villains in this text, rather, the frame applied is that of the victim. As described in more detail in Chapter 2, "subsistence" looters often are, in fact, suffering from dire circumstances (Hardy, 2015b) and it can be presumed that the author takes the suffering of the Syrian civil society to be common knowledge in the audience. The fact that only a few sentences are spent on these looters shows that they are not the protagonists of this piece.

ORQ 1.3: "Which words are used to describe other actors in the trade?"

There is little in the text about the actors between the source and the market end of the trade, except for a reference to “smugglers or middlemen” in one instance. This reflects that these people are not the protagonists of the article.

ORQ 1.4: "Which words are used to describe the terror group IS?"

IS itself features less prominently in the article than the headline would suggest. It is said that the group "acts with the market in mind", and "profits from loot and regulates black market profits". Antiquities are said to "have become a more significant revenue source for Isis as the conflict has progressed", and “[looters] paying Isis a tax on artefacts leaving its territory”. Other atrocities committed by IS are not mentioned, only in one instance it is said that the group "uses the media to display destruction". In contrast to the other groups, the terrorists feature not as individuals, but as a faceless group or institution.

ORQ 2.1: "Which words are used to describe the situation of antiquities looting in Syria (2016)?"

Here it is noted that [IS] "acts/loots with the market in mind". It is thereby suggested that a well-known threat to society may become more dangerous by accumulating resources, which hints to a moral panic. Moreover, the article indicates that antiquities looting is not a new problem as "[t]he Western appetite for antiquities has always been a motivation for others to loot them." This suggests that the problem is bigger than the exact situation described, a conjecture that is part of most moral panics, known as "It's not Only This" (Cohen, 2002, p. 52). Framing devices like the phrasing "pillage of ancient sites" point out the severity of the looting problem.

ORQ 2.2: "Which words are used to describe the antiquities trade in 2016?"

With the terms "economic value", "demand", "supply", and "depressed prices", the antiquities trade is explained in purely economic terms. While precise in wording, the author's stance is not neutral, which is shown in exhortations such as "It's imperative that this demand ... ceases", or by the term "plundered". A clear stance on an issue, however, is to be expected in an expert opinion piece.

As in ORQ 1.3, the stages between the source and the end consumer are only briefly mentioned. The mention of Turkey as "the gateway" reflects that country's role as a so-called "transit country", a country through which a looted antiquity passes before it reaches the market (Kersel, 2006a, p. 191; Mackenzie, 2005; Palombo & Yates, 2023, p. 260). In the two following sentences antiquities "enter commerce surreptitiously, often sold online [...]. Undercover investigations have confirmed that illicit goods have reached buyers in Europe and the US" the grammatical structure transfers agency from people who traffic antiquities across borders to the artefacts themselves. The same can be seen in the expression "influx of plundered antiquities", which is impersonal. Except for the actors in the market countries, the antiquities trafficking chain is framed as an economic operation.

This is consistent with findings presented in academic literature (e.g. Mackenzie, 2020; Mackenzie et al., 2019). By using this framing, the author places responsibility on the buyers themselves.

It is notable that of the different actors in the antiquities trafficking chain, which the first four ORQs are concerned with, none are described so vividly as the buyers of illicit Syrian antiquities. They are the main focus of attention. The terror group IS is given the second-most space in the article. The actual smugglers and looters are only mentioned in one and two sentences, respectively.

The description of the looting problem itself shows some characteristics of moral panic, namely when the IS group is mentioned. Both the destruction wrought by the looting of ancient sites and the funding of terrorism are described in a way to call attention to a dramatic situation, which needs immediate attention. The international antiquities trade is described relatively impersonally. Instead of focusing on the traffickers, smugglers and intermediaries that handle looted artefacts in several countries, here the active subject are the antiquities themselves. The structure of the market is described in business terms. This frames the illicit antiquities trade as essentially a business that functions along normal lines of demand and supply.

The IS group is described more like an institution than a group of persons. The description of the terrorists is impersonal, which is a contrast to the above-mentioned introduction of buyers as "individuals". Their part in the antiquities looting and smuggling is described as businesslike as the functioning of the trade itself. The archetype of the villain, which could have been expected to be a fitting frame for the terrorists, is not used here. They are framed as part of the problem, but not its cause.

The people who take the ancient artefacts out of the ground themselves are portrayed as the victims of their circumstances, namely the ongoing conflict and subsequent economic collapse.

This leaves as the main actors of the article the buyers of illicit antiquities, who are described as based in Europe and North America—the same countries most of the readers are presumed live in. This is meant to create a connection between the audience and the topic of the article.

The buyers of antiquities are granted the most agency by the language used. They are the only ones described as "individuals", which hints at an idea of individual responsibility. They are also a far less monolithic group than all other groups described: there are those who are merely ignorant, who can be educated so that they will not create a demand for looting anymore, while others are described as "unscrupulous" or "callously uncaring". The latter are the ones perceived as the real villains in the article, which makes them ultimately responsible for the situation, described as a direct threat to the audience's society (terrorism) and values (the destruction of cultural heritage). In terms of a moral panic, we can see at least the elements of *concern* (for heritage) and *hostility* (against those buyers of antiquities that act knowingly) in this article. It is mainly the actors at the

demand end of the international antiquities market, the collectors, who are framed as the folk devils in a moral panic here.

The frame that emerges from the text, identifies:

- 1) a **cause**: the demand for antiquities from "the West" paired with either ignorance or contempt of the law on the part of the buyers,
- 2) for a **problem**: terror funding through antiquities looting and the destruction of cultural heritage,
- 3) **values**: respect for cultural heritage and the law, and
- 4) a **solution**: due diligence by the buyers of antiquities, which is enforced by laws, as well as education on the problem.

Only some aspects of the studied article were analysed here, namely, the moral and ethical evaluation of the different actors in the antiquities trade. I selected the aspects that I identified as most fitting to the main and contributory research questions of this article in the context of moral panic. I concentrate similarly on aspects relevant to moral panic in the main analysis.

By highlighting the connection between the international antiquities market, antiquities looting, and terror funding, the expert author puts current events (of the time, namely the reign of IS in parts of Syria and Iraq) in a broader context and explains a specialist issue, antiquities trafficking, to a non-specialist audience. It can also be argued that the piece has some elements of moral panic, as described above. The framing of this article does suggest an evil threatening society (thus a cause for a moral panic), but crucially, this is not only terrorism, but also cultural destruction caused by personal greed (or "appetite") for antiquities. The values that the author assumes to share with her audience is the respect both of cultural heritage and the law. The latter means to refrain both from accepting stolen property and from financially supporting terrorism, however indirectly. It is made clear that both can be avoided by not engaging in the trade with unprovenanced antiquities.

To answer the main research question as to what extent the international antiquities trade is framed as the cause for moral panic, it can be said that the responsibility for the bad situation (heritage destruction and terror funding) is clearly placed at the demand end of the trade, especially with those buyers who knowingly purchase illicit Syrian antiquities. The evidence for a moral panic is not strong in this singular article, but it may feed unintentionally into a pre-existing one.

As will be seen in the media analysis, the more general news trends can show a moral panic more clearly. Therefore, I identified several trends and themes in the framing of the 75 articles from my sample, which can be linked to the elements and stages of a moral panic. To see how these trends and themes were reflected in changes in cultural heritage law, and in the reaction of the antiquities market, the results of the media analysis were contextualised with key texts from these sources.

3.3 Contextualisation of Trends and Themes of the Media Analysis

While the stages of moral panic can be followed in the media until the point of its vanishing out of the public debate (Cohen, 2002), a moral panic also tends to have an impact in other parts of society (Cricher, 2008; Goode & Ben-Yehuda, 1994). To assess this impact, I investigated how the media portrayal of antiquities trafficking between 2003 and 2021 was reflected in legal changes and market rhetoric. To facilitate this analysis, I used a method called coding in the social sciences.

3.3.1 Coding

After analysing the media reporting about the topic and identifying overall trends and themes, I compared the themes with several official texts concerning changes in cultural heritage legislation in Germany as well as statements by a selection of voices from the antiquities market. That is to say, the key trends and themes I identified in the framing analysis of the news reports on looting and trafficking were used as "codes" (discussed below) to find out how strongly the debates in the lawmaking process and the market reaction reflect these themes. In the social sciences, so-called 'coding' is an analytical method that is used to structure and analyse bodies of data (Skjott Linneberg & Korsgaard, 2019). This is done by identifying meaningful parts of the data and assigning categorisations by labelling them with a descriptive word or short phrase: this label is called a code (Saldana, 2013, p. 3; Skjott Linneberg & Korsgaard, 2019, p. 6). If the data to be analysed is text, the code is usually applied to sentences or turns of phrase that are considered meaningful by the researcher, which in the case of this study meant phrases and sentences that in my judgement reflected the results of the preceding media analysis. As such, a code is what has been called a "researcher-generated construct" (Saldana, 2013, p. 4). For the purpose of this research, using these codes in my analysis is suitable because it allows me to analyse patterns of language quickly and easily. The codes also help to identify elements of moral panic, as defined by Goode and Ben-Yehuda (2010).

Coding can be done in two general ways: inductive or deductive. Inductive coding means that the researcher assigns codes directly from the data (Skjott Linneberg & Korsgaard, 2019, p. 12), while in deductive coding, codes follow a pre-existing theoretical framework (Skjott Linneberg & Korsgaard, 2019, p. 13). In deductive coding, the codes can be themes drawn from literature or taken from the theoretical framework the research is based on (Skjott Linneberg & Korsgaard, 2019, p. 14). I chose deductive coding, using the trends and themes from the media analysis as my codes, because my goal was to contextualise the preceding news framing analysis with the data for legal changes and market reactions. That means, the themes were drawn directly from the results of

the news framing analysis. I identified sentences, words, and phrases in the selected texts which reflected these themes and categorised them accordingly. My approach to the coding method mirrors the news framing analysis in that it works with the lexical choices made in the debate. Having done the news framing analysis before made it possible to see these themes reflected in the wording.

While coding can be done by hand, computer-aided approaches are now used as well (Nelson et al., 2021). This can be helpful for coding larger datasets (Skjott Linneberg & Korsgaard, 2019, p. 6).

While my data set was relatively limited, the software approach still showed to be fruitful, as it made it easier to cross-reference the themes from the media analysis in the legal and market datasets. To achieve results more quickly than through a detailed framing analysis, I uploaded the selected texts in PDF format to the software Qualcoder3.2. and coded them, using the results of the preceding media analysis as my codes. I used the software to highlight these pre-identified codes in different colours, which then would also show how many times one or the other theme would come up in any given text, and thus helped to compare the prevalence of some themes versus others. This can be classified rather as a software-aided, but still human-led approach to text coding, than computer-based coding (Nelson et al., 2021, p. 226). I chose Qualcoder because it is an open source program, easy to use, and compatible with Mac, Windows, and Linux operation systems.

The following two sections give a short overview on how the two sets of data for legal changes and market reactions interact with the media analysis and each other in the context of moral panic, including both the coded and non-coded texts I used.

3.3.2 Legal changes: The Cultural Property Protection Law (KGSG)

One effect a moral panic can have is to inspire the development and implementation of new laws and regulations (Cricher, 2008, p. 1130). The legal changes part of this study aims to shed light on the social and political context in which Germany's 2016 Cultural Property Protection Law/*Kulturgutschutzgesetz* (KGSG) was created, amended, and approved. My approach to this analysis was partly inspired by Yates's analysis of Bolivian archaeological law (Yates, 2012), which contextualised Bolivian legislation with the social and political developments in the country. The analysis of legal changes thus started with an initial reading through the text of the preceding law from 2007, and the official evaluation report on this legislation, published by the German government in 2013 (Neumann, 2013). I did this to identify the stated goals of that legislation and the evaluation of its success. Then, I coded the KGSG's final text and the parliamentary debate before its adoption, as well as the official press statement, in the manner described above. This was

done to contextualise the law with the political and social environment around its creation by analysing the lexical choices made by stakeholders in the debate, the lawmakers, and the ministry's press office. Reading through the preceding law and its evaluation report first gave me the necessary insight into the development of cultural heritage legislation in Germany before the creation of the 2016 KGSG. The results of the news framing analysis formed the basis of my analysis of the texts selected for coding. The coding and analysis of the legal changes preceded the coding and analysis of the market reactions, because they were as much reactions to the legal changes as to the media portrayal of antiquities trafficking.

3.3.3 Reactions and consequences in the antiquities market

The final step of my analysis was the coding of statements from the antiquities market made after the amendment of the law, to see if a reaction to moral panic is present in the self-presentation of the market. I did this after the coding of the texts connected with the 2016 law amendment, because many of the selected texts react directly or indirectly to this change in legislation. Within the framework of moral panic a certain amount of "backlash", or, at least, some attempts to deemphasise the issue by media or politicians whose goals do not align with the changes called for in the moral panic, are often part of a moral panic (Garland, 2008, p. 18). At the same time, "folk devils" have been known to take part in the discourse on moral panics in their own right, which then makes them active participants therein (Garland, 2008, p. 14; McRobbie & Thornton, 1995; Walsh, 2017). In seeking to answer the question whether a moral panic about antiquities took place, one would assume that if so, antiquities dealers would be the relevant "folk devils". This then leads to the question whether they react from this position to both the media themes that were identified, and the legal developments, which I addressed with the coding of the selected texts from the market.

3.4 Benefits and limitations of the chosen methods

The two methodological approaches I chose to identify whether a moral panic was taking place around the German antiquities market in the time between 2003 and 2021 are both based on the ways in which the problems of antiquities trafficking and of potential illicit antiquities sold in Germany were portrayed by media, politicians, market actors and other stakeholders in the debate. As such, they are both text-based methods of data analysis. The following sections give an overview on the benefits of these methods, based on which I chose this approach, as well as the limitations which I had to keep in mind and mitigate while using them.

3.4.1 Benefits

To identify whether a moral panic is taking place, an analysis of the media reporting about the topic is crucial, since the media are one of the first driving agents in a moral panic (Cohen, 2002; Critcher, 2017; Garland, 2008; Goode & Ben-Yehuda, 2011). I have selected news framing analysis as method to examine the reporting on antiquities trafficking because it can identify which issues are presented as a problem, or even threat, to the audience, and which solutions are suggested by the writers (Entman, 2004, p. 5; Van Gorp, 2009). I found that this problem-oriented analytical approach makes this method very useful for recognising the stages and elements of a moral panic. The words used to describe certain issues or circumstances can carry nuances of meaning which may or may not be intended by the writer, but are still understood as having a resonance within the culture shared by the writer and their audience (Van Gorp, 2009, p. 86).

Moreover, framing analysis can show repetitive patterns in the language used by journalists, and thereby identify an important element of a moral panic, *consensus*, as well as tropes and stereotypes perpetuated in the writing (Entman et al., 2009; Van Gorp, 2009). Also, especially in the context of reporting on terrorism, it can identify the language of the so-called "War on Terror", which have been shown to be often used almost reflexively (Lewis & Reese, 2009; Reese, 2009). This is important for this study, to disentangle reporting that may be indicative for a moral panic about terrorism, and that more directly representing a moral panic on antiquities trafficking and the destruction of cultural heritage.

In addition to identifying consistent patterns in writing, framing analysis can also show changes in the wording of articles, possibly indicating changing attitudes or intentions of authors (Van Gorp, 2009). These two aspects together are the reason why I see news framing analysis as a fitting tool to analyse the media reporting about antiquities looting and trafficking in German newspapers.

To contextualise the findings from this analysis, I chose coding to visualise how the key trends and themes in the media reporting were reflected in legal changes and market reaction. Coding presented itself as a method to engage with the data sentence by sentence, and therefore useful to contextualise the results of the media analysis with stakeholder statements from the legal/political and market sphere. It has been pointed out that this approach yields a deeper analytical engagement than simply reading through the dataset (Skjott Linneberg & Korsgaard, 2019, p. 6). At the same time, the computer-aided coding approach helped me save time and keep my results concise, while not using a fully computerised coding technique.

The results from the news framing analysis formed the basis for the coding of how the same topic was framed in the legal and political sphere, as well as the self-representation of the antiquities

market. I did this because in a moral panic, a reaction needs to follow from the media portrayal of the supposed threat, with influential figures, such as politicians "manning the moral barricades" (Cohen, 2002, p. 1), which can lead to the proposal of new laws (Cricher, 2008, p. 1130).

Another possible step is a reaction, or interaction of the "folk devil" in the moral panic, possibly trying to "spin" the public perception in their favour, either in the same media, or even using their own channels (Garland, 2008, p. 14; McRobbie & Thornton, 1995; Walsh, 2017). The latter was the reason for choosing to analyse statements from the antiquities market itself, to see if and how the media trends possibly indicative of a moral panic were reflected or rebuked by market actors. In combination, I see these two methods, both based in the lexical choices made by stakeholders in the debate on antiquities trafficking, as a fitting approach to identify whether a moral panic was taking place.

3.4.2 Limitations

While frames are drawn from a common cultural stock, people's individual perceptions vary. The reception of the used frames by the audience may therefore not necessarily always align with what the journalist intended. One of the limiting factors to consider when doing news framing analysis is the positionality of the researcher. Positionality means the specific personal outlook and potential biases of the person analysing the data (Van Gorp, 2009). As any media analysis relies on interpretation, an awareness of these biases is crucial to reach a meaningful conclusion. As an archaeologist with experience in Syria, now researching the international trade in Western Asian conflict antiquities, the case, especially of Syrian antiquities during the civil war (and the human suffering attached to it), is a topic I am involved in both academically and emotionally. Moreover, as a European, I am potentially influenced by orientalist views on Western Asia. By help of Van Gorp's (2009) method of eliminating subjectivity in framing analysis, I tried to keep as neutral a position as possible in identifying the frames employed in the news reporting.

Another aspect to note in this respect is how my personal point of view differs from the intended audience. As a researcher with background knowledge on the structure of the antiquities market and the situation of antiquities looting, I have arguably a different perspective than the broader public. The news framing analysis in the following chapter and the appendix has been carried out with this caveat in mind, providing context when deemed necessary.

Moreover, while as a non-English native speaker, it is possible that some meanings of the analysed lexical building blocks escape me, I feel confident to understand subtle references. Since German is

my native language, this problem is not present in the media analysis as such. However, in a few instances, the need for translation arose, with all attached issues of subtle changes in meaning. Much like news framing analysis, coding can be seen as inherently subjective in nature (Skjott Linneberg & Korsgaard, 2019, p. 21). Codes, being a "researcher-generated concept" (Saldana, 2013, p. 4), are subject to the researcher's interpretation of the data. Therefore, the positionality of the researcher is equally important to keep in mind while doing the analysis.

Using software for coding, while making it easier to handle large datasets, can also have drawbacks such as resulting in too many codes or leading to a less in-depth analysis (Skjott Linneberg & Korsgaard, 2019, p. 6). I mitigated the former problem by sticking to the trends and themes from the media analysis for my codes, and the latter by limiting my datasets to a manageable number of texts, so I still had the chance to engage deeply with their contents. As has been pointed out by Nelson et al. (2021, p. 226), software approaches to coding are best used to complement, not replace the human analysis, especially in deductive coding. This advice was followed in the coding done for this study.

The following chapter presents the results of the framing analysis of the 75 newspaper articles compiled for this study, including a timeline of news, and identifying key themes and trends in the portrayal of antiquities trafficking in German-language media during the researched time period.

4 MEDIA ANALYSIS

Arguably the most important vector in a moral panic is exaggeration and distortion of an issue by media reporting (Cohen, 2002; Goode & Ben-Yehuda, 2010, 2011). The public generally rely on news media reports for their information on conflicts in other countries, such as the ones covered in this thesis, and phenomena such as crimes which they have no chance to witness themselves (Cohen, 2002, p. 9; Hall, 1997). Thus, much of the impact the looting in conflict zones such as Afghanistan, Iraq and Syria has on private citizens in Germany is facilitated through the media. The first step of assessing this impact is therefore an analysis of media reports on the topic looting and trafficking antiquities from these three countries as well as their neighbouring states.

The method I chose to study the representation of archaeological looting and antiquities trafficking in Western Asia on the media reporting in Germany is called news framing analysis and described in more detail in Chapter 3. My sample selection for the framing analysis is also explained there. The individual framing analysis for each of the articles can be found in the Appendix (A. 1), while the overall results are presented here.

4.1 Timeline of news: overall peaks and trends

From the analysis of 75 newspaper articles, the first and most obvious development is the fluctuating number of articles on the topic of illicit antiquities over the researched span of time between 1991 and 2021. It is in the nature of news reporting, especially when it comes to printed newspapers with page and line limitations in each issue, that not every topic can be treated equally at all times, and what is deemed important and newsworthy follows certain trends curated by journalists (Shoemaker et al., 2019). This also goes for the topic of antiquities trafficking in general and for which countries are the main subject of the reporting (Brodie, 2015c). These trends can be an indicator for whether a moral panic is taking place, because when an issue is identified as a threat to society, and thus cause for a moral panic, mass media are one of the first social actors to react (Goode & Ben-Yehuda, 2011, p. 50), or, following some theories, even drive the panic through their reporting (Cohen, 2002, p. 9). The unfolding of a moral panic in the stages laid out by Cohen is best identified by studying the data in chronological order, because this approach makes it easy to see when an issue became a major news topic with many articles dedicated to it, and when and how it disappeared from the newspapers again, indicating the end of the moral panic. Therefore, the 75 articles I studied for this media analysis were ordered into a timeline of news and studied with their time of publication in mind (see also A.1).

The first and most obvious result from this initial analysis is that there are almost no articles on the topic of antiquities looting and trafficking in Western Asia before the American-led invasion of Iraq in 2003. The three articles on the topic published before 2003 that I found via Nexis dealt with antiquities trafficking in general (Waser, 1997), Israel (Lüscher, 2002), and Afghanistan (AFP, 2002). Apart from this short article, Afghanistan features prominently in only one more article found on Nexis and analysed for this study (Schießl, 2015). This leads to a first conclusion that the discourse on conflict antiquities from Western Asia did not take place in the aftermath of the 1990–1991 Gulf War, and centered mainly around the 2003–2011 Iraq War and the 2011–2024 Syrian Civil War.

4.1.1 Before 2003

The analysis of the articles shows almost no mention of antiquities looting or trafficking from the countries discussed in this thesis in German-language newspapers before 2003, and in fact, none of those from that time that do mention looting and trafficking come from Germany itself. Two of the three mentions are from the Swiss daily newspaper *Neue Zürcher Zeitung* (NZZ) (Lüscher, 2002; Waser, 1997), the third is a short German-language AFP report (AFP, 2002). They deal, in chronological order, with the international antiquities market generally, the so-called "James Ossuary" from Israel, and a police bust of antiquities traffickers in Afghanistan. Signs of moral panic or even concern for the loss of archaeological context and the social inequalities exacerbated by antiquities trafficking, are absent from these texts.

4.1.2 2003

While Iraq's archaeological sites had already been heavily looted in the 1990s following the 1991 Gulf War (Brodie, 2011a), and looting had picked up in severity again shortly before the 2003 invasion of Iraq (Stone, 2008, p. 135), archaeological looting in Iraq only became a news topic in the German media in May 2003, after the fall of Baghdad in April 2003. Still, the media interest in this topic picked up slowly: a total of only two articles about the looting of archaeological sites in southern Iraq could be found via Nexis. One of them is a short report about an exhibition of Iraqi antiquities in the British Museum, evidently held in reaction to the looting of the Iraq Museum (Waser, 2003). The only other piece found on the topic is a notably sarcastic commentary (op-ed), which mocks concern about antiquities trafficking, placing the responsibility for the loss of heritage firmly with the locals and generally portraying the concern for Iraqi heritage and antiquities as a problem of detached academics (Dittmar, 2003). While the loss of cultural heritage is lamented in some of these early pieces, the classic elements of a moral panic are not present in a significant way.

4.1.3 2005–2007: Concern about looting in Iraq

In 2005, Nexis searches produced five articles dealing with the looting of antiquities in Iraq, at least some of which draw the connection to the international, and even the German antiquities market (Doering, 2005; Kapff, 2005; Plate, 2005; Zekri, 2005a, 2005b).

It is in this year that Germany's lack of legislation for the protection of foreign antiquities is brought up for the first time in the form of an interview with archaeologist Michael Müller-Karpe (Doering, 2005). This interview is also the first article on the topic that appeared in the politics section, rather than the culture section of the respective newspaper. The topic of lacking legislation was taken up in another article, which described Germany as a "fence state" ("Hehlerstaat") in its title, potentially carrying a tone of *hostility* (Zekri, 2005a). Another first in the German media portrayal is the reference to antiquities trafficking supposedly being the third-largest illicit market (Kapff, 2005). One article from 2005 also deals with the sale of looted antiquities on the internet. It mentions falling prices due to widespread looting (Plate, 2005).

The years 2006 and 2007 yielded three articles each: (Koldehoff, 2006; Müller-Karpe, 2006; Schauerte, 2006) and (Bauer, 2007; Doering, 2007; SDA, 2007) respectively.

The general tone in the pieces from these years shows a heightened sense of *concern* about the loss of cultural heritage through looting, which is the first, and arguably the most essential element of moral panic following Goode & Ben-Yehuda (2010). There is a first mention of "Terror" (terrorism) in one article's title that is not exactly supported in the main text, suggesting an early example of the way antiquities trafficking is framed later (Zekri, 2005b). Terror financing comes up once, notably suggested by a journalist to her interview partner (Doering, 2007). Other aspects such as *disproportionate* descriptions of the problem or a sense of *hostility* crop up occasionally, usually together and in discussions of Germany's first cultural protection law, which archaeologist Michael Müller-Karpe dismissed as largely ineffective (Doering, 2005, 2007; Müller-Karpe, 2006). A widespread *consensus* among the writers is, however, not in evidence. Neither is there any indication that politicians or other influential figures take a stance in the matter to "man the moral barricades" (Cohen, 2002, p. 1) and demand change. Both of these factors indicate that there is not yet a moral panic happening.

After 2007, the national newspapers of Germany become relatively silent on the topic for several years. This could be interpreted as Cohen's fifth stage, the eventual dying down of the moral panic, and thereby also constitute the element of *volatility*. However, since there was no widespread *consensus* among the writers, and the topic was not as prominent in the media, this interpretation is doubtful in this context. It seems more likely that, while the topic of antiquities trafficking certainly

had gained some public attention during the course of the 2003–2007 Iraq war, it cannot be classified as a moral panic just yet.

4.1.4 2009–2011: An Iraqi gold vessel and other restitutions

In 2009, six articles follow the case of the seizure by authorities of a small gold vessel from the Old Babylonian period; three of them in local newspapers in the area around Mainz ('Finanzgericht: Goldgefäß Aus Dem Irak', 2009; 'Goldgefäß - Museumsbrief an Steinmeier', 2009; 'Goldgefäß - Zoll Hofft Auf "Konsens"', 2009), and four of them within one week in early July (Gaul, 2009; 'Goldgefäß - Museumsbrief an Steinmeier', 2009; 'Goldgefäß - Zoll Hofft Auf "Konsens"', 2009; Platen, 2009). The vessel, which was falsely declared as "provincial Roman" (i.e., presumably from Germany) by the seller, was seized by customs and then held in the *Römisch-Germanisches Zentralmuseum* (today *Leibniz-Zentrum für Archäologie*) in Mainz. The protagonist in these articles is usually archaeologist Michael Müller-Karpe whose expertise formed the grounds upon which the vessel was seized from the auction house Hirsch in Munich. Although this is only one case, the problem of antiquities trafficking, as well as the shortcomings of the law with regards to curbing the trade in illicit antiquities in Germany, are brought up regularly. A sense of *concern* for heritage is present in the portrayal of this case, however, the tone is kept neutral. The articles from local newspapers dealing with this case explain the peak seen in Fig. 4.1 for 2009/2010.

There is one more article from that year, also referencing the case of the gold vessel, but more broadly discussing the trade in looted Iraqi antiquities in Germany. It is an interview with then Iraqi ambassador to Germany Alaa al-Hashemy (Doering, 2009). This marks the first time a politician weighs in on the issue of illicit Iraqi antiquities in Germany, at least in a newspaper interview. There is a tone of concern for heritage present, as well as vocal criticism of the then-current German laws. Notably, Hashemy calls antiquities looting and trafficking a crime "against all humanity".

In 2010 and 2011, the topic is brought up again in several short reports on the restitution of Iraqi artefacts (including the above-mentioned gold vessel), exhibitions dealing with the same issue, and a legal dispute between an antiquities dealer and Michael Müller-Karpe, whom the dealer had sued for slander ('Erfolg Im Kampf Gegen Grabräuber', 2011; 'Kultur Kompakt', 2011; 'Raubbau Am Gedächtnis Der Menschheit', 2011; 'Teilerfolg Für Antikenhändler', 2011; Meyer, 2010; Müller-Karpe, 2011b; Zick, 2011). Note that none of the reported restitution cases were based on the cultural protection law of the time, but rather on (more or less) voluntary forfeitures or bilateral agreements after the disputed objects were made publicly known and met with restitution claims by the Iraqi state. In one of the articles, there is a reference to 9/11 terrorist Mohammed Atta, who had

allegedly tried to sell Afghan antiquities to a German scholar in order to fund his group's terrorist activities ('Raubbau Am Gedächtnis Der Menschheit', 2011), going back to an earlier report in the magazine *Der Spiegel*, from 2005 ('Kunst als Terrorfinanzierung?', 2005). This can be seen as one of the earliest examples of the German media linking antiquities trafficking with Islamic terrorism, despite having little to go on except rumours.

Some of the articles from this period adopt more dramatic language to describe the problem of antiquities trafficking, while others maintain a neutral tone. One (Meyer, 2010), dealing with antiquities from Afghanistan, takes on the more romanticising tone of earlier articles on the same topic, such as (Waser, 1997). This article also is the only one dealing with Afghanistan except the short agency report from 2002 mentioned above (AFP, 2002), showing that Afghanistan was not really a part of the media discourse on conflict-related antiquities trafficking in Germany, despite the fact that German troops were part of this conflict.

It is obvious that, while some writers have clearly identified the issue of antiquities trafficking as an immediate threat, and begun to emotionalise it, there is still no widespread *consensus*. Moreover, the number of articles on the topic, especially in papers with a wider range, is still too low to constitute a moral panic.

4.1.5 2012–2013: Concern about looting in Syria

With the escalation of the Syrian civil war in 2012, articles about the issue of antiquities looting and trafficking, as well as the destruction of cultural heritage through collateral damage became a more regular feature in the arts and culture pages of German-language newspapers (Baykal, 2012; Fuchs, 2012; Gartmann, 2012; Hanimann, 2013; Metzger, 2012a, 2012b; Sarkis, 2012; Steffens, 2013). In 2012 and 2013, several articles highlight a heightened sense of *concern* for Syrian cultural heritage following violent clashes between factions in the UNESCO World Heritage site of Aleppo, and widespread looting of archaeological sites. In addition to *concern*, two more elements of moral panic come up more distinctly now. The first is *hostility*, often in the form of harsh condemnation of the illicit antiquities trade, and increased use of unflattering epithets, such as calling market actors collectively "Hehler" (fences). Secondly, by 2013, most articles also show a certain level of *consensus* on the threat to cultural heritage through looting, despite being written for newspapers of different political backgrounds and by different authors.

It is notable here that the lexical choices of most journalists have changed. For example, antiquities are now more regularly described as the "Kulturerbe" (cultural heritage) of their origin country or the world, rather than with more romanticising epithets such as "Schätze" (treasures), which was

widespread before. The importance of archaeological context it highlighted in many of these pieces, as is the connection of the international art market to acts of antiquities looting, with willing buyers of unprovenanced antiquities providing an incentive to loot archaeological sites.

The Swiss news agency report about the Basel Ancient Art Fair (BAAF), in which antiquities are framed simply as art objects (SDA, 2012), now stands out among other pieces from that year, when some years before this kind of language was much more common. The short announcement uses exclusively the term "Kunst", (art) for antiquities and seems more concerned with the effect antiquities looting could have on potential collectors, i.e., "verunsichern", (unsettling) them. It is notably the only piece analysed in this study that connects looting to the so-called "Arab Spring" more than the following or past conflicts. Archaeological looting in countries subject to political crisis is framed as a problem for buyers of antiquities rather than for the people and nations who have been deprived of their heritage. The patron of the BAAF is the International Association of Dealers in Ancient Art (IADAA), whose press statement this piece most likely draws on.

4.1.6 2014–2015: The Islamic State and moral panic

In the summer of 2014, the terror group Islamic State (IS) and their widely-publicised campaign of destruction of cultural heritage became a topic inseparably linked to the reporting on the looting and trafficking of Syrian and Iraqi antiquities. For this year, the first article found via Nexis with the search term "Antikenschmuggel" was an op-ed on the advance of IS from August 2014, mentioning antiquities trafficking mostly as an aside, as one of the ways in which the terrorists fund themselves (Doering, 2014b). There is no source or evidence given for this claim.

The conflation of terror funding and antiquities trafficking gave way to an even stronger form of *hostility*, now shown towards the terrorists on one hand, but on the other hand also towards buyers of unprovenanced antiquities, who were accused of terror funding (Doering, 2014a, 2014b; Frey, 2014; Gehlen, 2014; Lüscher, 2014; von Riegen, 2014; Zimmermann & Timm, 2014).

There is also one example of a more contrary article, downplaying the problem and calling into question the disproportionate figures given for the trade (Zimmermann, 2014). Notably, this article was published in the same issue as an interview that seemed to be much more in line with the increasingly alarmist tone, and was co-authored by the same journalist (Zimmermann & Timm, 2014). Overall, however, there is a clear *consensus* forming among the writers, and *disproportionate* figures feature in almost all of the articles. In early 2015, this style of reporting reaches a peak with the relatively impressive number of seven articles on the topic in February of that year alone ('Die eigentlichen Täter sind die Käufer', 2015; 'Kulturerbe Füllt Kriegskasse',

2015; Gehlen, 2015a, 2015b, 2015c; Lindner, 2015; Waser, 2015). Note that three of these articles are written by the same person, with only minimal changes in wording, for different newspapers in Germany and Austria. The fact that the author could sell his piece to multiple buyers indicates that the topic was seen as quite newsworthy by editors.

My searches on Nexis yielded a total of 10 articles for 2014, 16 for the entire year of 2015 ('Die eigentlichen Täter sind die Käufer', 2015; Funke, 2015; Gehlen, 2015a, 2015b, 2015c; Geisen, 2015; 'Geraubtes Erbe; Zur Kulturgutschutz-Debatte: Günther Wessel Über Illegalen Antikenhandel', 2015; Hanimann, 2013; Hein & Müller, 2015; 'Kulturerbe Füllt Kriegskasse', 2015; Lindner, 2015; Schießl, 2015; SDA, 2015a; Waser, 2015; Wessel, 2015). This number of articles constitutes a general peak in media attention, which continues into 2016 with seven articles in that year (Coen & Henk, 2016; Häntzschel, 2016; Kuhn, 2016a, 2016b; Müller-Karpe, 2016; 'Museumschef Hilgert zu Kulturgutraub', 2016; Wiegelmann, 2016), albeit with the focus changing from the problem of antiquities trafficking, supposedly financing terror, towards the law amendment planned in Germany that year.

The social media spectacle of cultural vandalism enacted by IS was at the time widely understood by the German news media (as internationally) as a message to "the West", although this notion does not entirely hold up to scrutiny, seeing as it was only one part of a larger campaign of cultural genocide by the terrorists (Harmanşah, 2015). Nevertheless, reports about the destructions also helped to rouse more *concern* and gave way to more and more fantastic sums associated with their suspected wealth, and the part antiquities trafficking allegedly played in it. The element that becomes increasingly prominent through this link is *disproportion*. The market in illicit antiquities is now represented as a several billion dollar business in almost every article, and it is claimed that it is only third after to arms and drugs trafficking in transnational crime (Schießl, 2015; Waser, 2015), or fourth after arms, drugs, and human trafficking (Lüscher, 2014). It is notable here that the writers claim official bodies such as UNESCO as a source for these claims. Research, however, has shown them to be unprovable and likely overstated (European Commission et al., 2019; Yates & Brodie, 2023). With buyers implicated in terror funding, the element of *hostility* towards the market also becomes more pronounced, making them increasingly into folk devils themselves, accused of being "ultimately responsible" ('Die eigentlichen Täter sind die Käufer', 2015). The sense of a relatively broad *consensus* on the issue is even more clear now in the writing, and also from the repeated claims regarding the allegedly fabulous sums made by IS through antiquities trafficking. By stressing the connection between the international antiquities market and terror funding, this reporting put current events (of the time) in a broader context for the audience and feeds into an existing moral panic about Islamic terrorism, as described by Rothe and Muzzati (2004). The sharp

peak in numbers of articles, which died down as abruptly, are consistent with the element of *volatility*.

4.1.7 2015–2016: Reaction by authorities?

In addition to the continuation of the trends that were seen already in 2014, there is a stronger focus on the advertised amendment of the cultural property protection law from the second half of 2015 onwards, which was commented upon hopefully (Lindner, 2015). The call for better laws or stricter enforcement of existing laws is consistent with the third stage of a moral panic following Cohen (2002), while the reaction of authorities corresponds to the fourth stage. However, it should be noted here that the amendment of Germany's cultural heritage protection and restitution law from 2007 had already been in planning before the insurgence of the IS terror group in Syria and Iraq and the following media attention on alleged IS antiquities trafficking (Neumann, 2013). In that sense, the 2016 legislation only seemingly reacted to the calls for action. However, the preceding discourse on antiquities trafficking certainly led to a higher public interest in the debate around the amendment, which was even mentioned before by then State Minister for Culture, Monika Grütters, who promoted the new legislation (Zimmermann & Timm, 2014).

The tone is getting somewhat calmer in the second half of 2015, while there is still a relatively high number of articles on the topic of antiquities trafficking. The assertion that IS is at least partly financed by selling looted antiquities was firmly in place by that time, consistent with the element of *consensus* among writers. In December of that year, the amendment of the "cultural property restitution law" (*Kulturgüterrückgabegesetz*) into the "cultural property protection law" (*Kulturgutschutzgesetz*) had been announced publicly, which led to hopeful commentary, but also criticism. There is still a sense of *concern*, especially from the side of archaeologists, who still point out the implication of the international, and specifically the German antiquities market, with the looting of archaeological sites.

In early 2016, a new trend in the reporting is visible, namely, the concentration on the amendment of the cultural property legislation and the crafting of the new Cultural Property Protection Law, *Kulturgutschutzgesetz*, or KGSG (Häntzschel, 2016; Kuhn, 2016a, 2016b; Müller-Karpe, 2016). One of the articles is a report from the parliamentary debate before the adoption of the KGSG, which is discussed in detail in Chapter 5, and notably derisive towards the whole process (Wiegelmann, 2016). The wording, and an unnecessary sexist remark towards state minister of culture Monika Grütters, make it quite clear that the author takes neither the problem of antiquities

trafficking, nor the people concerned about it, seriously. The piece can be interpreted as part of the backlash to a moral panic that is in the stages of dying down.

4.1.8 2016 and beyond: The moral panic dies down

Later that year, a much calmer tone is seen in the reporting. Markus Hilgert, who was part of the expert witnesses called to the parliamentary debate on the KGSG, is quoted as saying that antiquities trafficking cannot be stopped by laws alone, be they at source or in market countries, and that the deeper reasons for looting and trafficking lie within social injustice (‘Museumschef Hilgert zu Kulturgutraub’, 2016). Another piece from November of the same year reports on the state of Assad's Syria and seems to imply even that the concern about cultural heritage is somewhat ridiculous in comparison to the human suffering in the ongoing civil war (Coen & Henk, 2016). In the following years, the few articles that mention the trafficking of West Asian antiquities in Germany (two in 2017, two in 2019, and one in 2020) all lack the elements of moral panic described above, some are even written in a somewhat resigned tone (Koldehoff, 2020; Krüger, 2017a, 2017b). One is taking a perspective quite defensive of antiquities dealers, lamenting a "criminalisation" of the market (Kronsteiner, 2019). This reflects the end of moral the panic, which had died down by the end of 2016 at the latest. This is also consistent with the element of *volatility*.

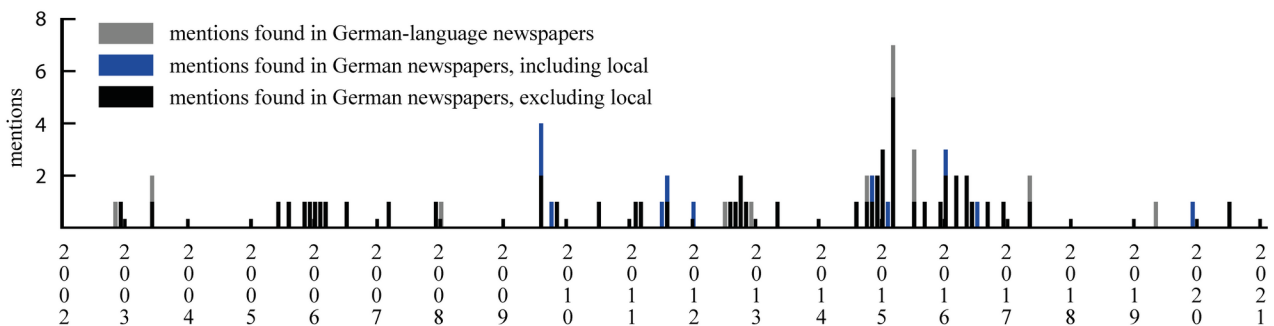


Fig. 4.1: Articles found mentioning the specified search terms in German national newspapers (black), and local newspapers (blue), as well as Austrian and Swiss newspapers (grey). Note the sharp peak in early 2015.

4.2 Key themes emerging from the media analysis

In this media analysis, some key themes have emerged from the reporting on the looting and trafficking of Western Asian, most often Iraqi and Syrian, cultural objects during conflict, which are indicative of a moral panic. I used these key themes as guideposts to contextualise the data on lawmaking and market reactions in the following chapter. That is, I converted them into deductive

codes, which I then used in the analysis of the texts on legal changes and market reactions in Chapters 5 and 6. The key themes that have been identified are the following:

4.2.1 From art to heritage

It is notable that, over time, the terms used to describe looted and trafficked antiquities have changed in the reporting. In the early years especially before 2003, besides more neutral terms like "Artefakte" (artefacts), "Objekte" (objects) or "Antiken" (antiquities), they were also often collectively called "Schätze" (treasures), invoking links to monetary value and a romanticised image of archaeology as treasure hunt. There was also a marked tendency to use terms connected to "art" for the antiquities, such as "antike Kunst" (ancient art), "Raubkunst" (looted art, or spoils of war), sometimes "Kunstschätze" (art treasures, or art objects). All these terms are framing devices, which perhaps unintentionally, highlight the artistic and monetary value of an object over its cultural or archaeological significance.

As time goes on, these framing devices are more and more given up in favour of a different view. While there are still a few mentions of the above-mentioned terms, those are often apparently due to variations in wording and attempts at using synonyms instead of repeating the same word. Overall, however, the phrasing leans more towards calling antiquities collectively "archäologische Funde/Artefakte" (archaeological finds/artefacts), "Kulturerbe" (cultural heritage), "Kulturgüter" (cultural goods), or "Kulturgut" (cultural property) in more recent years. Especially in articles dealing with the terror group IS, there is also an invocation of "Weltkulturerbe" (world heritage), or "Erbe der Menschheit" (the common heritage of humanity), which is often applied to Iraqi or Syrian, i.e., "Mesopotamian", antiquities, but not as much to antiquities from other cultures under a similar threat, such as, for example, the cultural heritage of Mali, which was also threatened by Islamic terrorists around the same time. This framing might be seen as a form of orientalism and appropriation itself (Bahrani, 2018). However, this change may also reflect a different way of thinking about antiquities, as well as a more critical view on the market in unprovenanced antiquities, also visible from some discussions of archaeological context in articles post 2003, which don't come up before that date.

4.2.2 Emotional language

In the wording of the news articles, it is notable that there is a clear appeal to the readers' emotions when it comes to the looting of archaeological sites. Especially in the early years of the Iraq war and later during the Syrian civil war, graphic descriptions of the devastation wrought by looting

activities are used whenever there is room for it in the article. In other cases, shorthands are used, in a few cases even a terminology that could also be used to describe sexual assault, such as "Schändung" (violation), and "sich vergreifen an" (to violate, misappropriate, abuse). The goal of these lexical choices is clearly also to elicit an emotional response of the audience, whether sincerely or, in at least one case, as sarcastic hyperbole.

Another emotional shorthand found is that of the antiquities market being "nimmersatt" (insatiable), or "hungrig" (hungry). This phrasing from the thematic realm of food consumption is comparable to the example article analysed in Chapter 3, talking about a "Western appetite for antiquities" (Amineddoleh, 2016).

Sometimes, the emotional language bleeds over into more obvious *hostility*, using words that clearly imply criminality like "Hehler" (fence), "halbseiden, dubios" (shady), etc. Framing devices such as sarcasm are also used to mock seemingly legal market practices.

Since most of the articles using this emotional language were printed in the arts and culture sections of the newspapers, it may have been assumed that the readers are generally people who care about cultural heritage and thus, the emotional message would reach its target.

4.2.3 The terror and organised crime connection

The connection between antiquities trafficking and terror financing is made in German media as early as 2005. This is at least partly due to a report that Mohammed Atta, one of the 9/11 plane hijackers, had offered to sell Afghan antiquities to a German archaeologist, and asked her where best to sell them, to gain funding in "2000 or 2001" ('Kunst als Terrorfinanzierung?', 2005). Around the same time, the reports also begin to link the antiquities market to transnational organised crime. The orientalist trope of "constant war in the Middle East" is often invoked in the earlier articles on this topic. Later, the reporting on illicit antiquities is almost exclusively tied to the terror group IS and their supposed stake in the trade. The connection with terrorism can be seen as an expression of the element of *concern*, specifically, the *concern* that money gained through illicit antiquities deals might be used to fund future terror attacks. While the terrorists certainly had a hand in antiquities trafficking, (Greenland et al., 2019; Topçuoğlu & Vorderstrasse, 2019), both the prominence of IS in the trafficking of antiquities out of Syria, and the importance of antiquities trafficking for the financing of their terrorist enterprise have been shown to be overstated in the reporting (Sabrine et al., 2022), much like the money supposedly made from the sale of illicit antiquities, discussed in the next section.

4.2.4 Disproportional figures

As early as 2005, the illicit antiquities trade is called "the third-largest illicit trade after the drugs and arms trades" in German newspapers. This claim echoes international reporting. It has never been substantiated, but instead has been demonstrated to be a factoid (Yates & Brodie, 2023). The factoid later becomes far more prominent in connection with the rise of IS and the subsequent peak in reporting. The figures cited then vary wildly, from "3 to 5 billions" to "36 billions" of dollars for the worldwide market in illicit antiquities, often without citing any credible sources. This tendency for *disproportion* and lack of credible evidence has been called out by antiquities crime experts (European Commission et al., 2019). Both are consistent with the media behaviour in a moral panic (Cohen, 2002; Garland, 2008; Goode & Ben-Yehuda, 2011).

4.2.5 Criticism of legal measures in Germany

Another key theme is the criticism of legislation against antiquities trafficking—or lack thereof—in Germany. Calls for "better", or stricter, legislation are a staple in a moral panic, and come up regularly in discussions around antiquities trafficking worldwide (Kersel & Gerstenblith, 2025). However, it is notable that this aspect of the discourse comes up only in 2005, meaning that in some of the first articles dealing with international antiquities trafficking, the legal situation in the market countries, which arguably led to those cases, was not criticised or discussed at all. From 2005 onwards, the call for better legislation or a more diligent enforcement of the law, becomes a standard in the reporting. Some pushback against this is seen as well, but the calls for better legislation outweigh the articles arguing against it by far. In 2007, Germany ratified the 1970 UNESCO convention and implemented its first cultural property protection law to some commentary from archaeologists both before and after (Doering, 2007; Müller-Karpe, 2006). In late 2015 and 2016, the topic of a planned amendment of the current legislation becomes the main topic of the articles dealing with antiquities trafficking. Despite the fact that this amendment had been planned since at least 2013, it is framed in the context of the preceding moral panic, i.e., the alleged terrorist funding by the antiquities trade. The responsible state minister, Monika Grütters, even acknowledged in an interview that her state ministry did not mind the publicity afforded to the law amendment by the media reporting on antiquities trafficking (Zimmermann & Timm, 2014).

4.3 Conclusion: A moral panic in the media

Over the time period from 1997 (the year for which the first article was found on Nexis) to 2021 (the year in which the latest was found for this study) the representation of Western Asian antiquities trafficking in German-language media undergoes several changes. One of the most notable changes is the number of articles dedicated to the topic, which spikes twice, once around 2005 during the Iraq war, and then again during the Syrian civil war, starting in 2012, but reaching a marked peak between 2014 and 2015, during the time IS began to conquer territory in Syria and Iraq. The first of these peaks, which is less pronounced, shows little evidence of a moral panic. While there is some concern about antiquities looting in Iraq, and the connection to the German antiquities market is made by some journalists and experts, there is neither a widespread *consensus* notable among the writers, nor is the problem identified as a threat to society. The former is an important element of moral panic following Goode and Ben-Yehuda's (2010) "attributional" approach (Critcher, 2008, 2017), the latter a crucial factor identified by Cohen (2002). Thus I conclude that in the time period of the 2003–2007 Iraq war and the years following it, an antiquities-related moral panic did not take place.

The second peak, between 2012 and 2016, however, shows a different picture. For one, the overall number of articles found via Nexis that are dedicated to antiquities looting and trafficking is clearly higher than ever before in the researched time period (see Fig. 1). Secondly, in the closer analysis of the articles, an increasingly alarmist tone could be identified in the writing between the second half of 2014 and early 2015. During this time, the topic of antiquities trafficking became linked in the media with the Islamic State (IS) terror group. The fear of Islamist terrorism post-2001 had been identified as a moral panic already by Rothe and Muzzati (2004), yet the close connection in the media between this topic and the concerns about looting and trafficking of antiquities from Syria came into full force only in 2014. There had been some earlier rumours on the supposed use of antiquities sales for terror financing in Germany, then connected to 9/11 attacker Mohammed Atta ('Kunst als Terrorfinanzierung?', 2005). The rise of the Islamic State group, however, and especially their very public display of destruction of cultural heritage, disseminated on social media, gave this narrative a new dimension; it was known at the time, that factions in the Syrian civil war were looting the country's archaeological sites for antiquities to sell to boost their war efforts, in expert circles (Casana, 2015; Casana & Panahipour, 2014) as well as in the German newspapers (Baykal, 2012; Hanimann, 2013; Steffens, 2013). This information, in combination with the highly public IS insurgency, combined to form a new main narrative in which antiquities trafficking in the Syrian civil war was almost exclusively reported about in combination with the IS terrorists

(Doering, 2014a, 2014b, 2014c; Frey, 2014; Gehlen, 2015a, 2015b, 2015c; Wessel, 2015). Together with some clear exaggeration on market figures, the prominence of the terrorists in the trafficking of antiquities also seems to have been overstated (Sabrine et al., 2022). The exaggeration and the repeating of unsubstantiated rumours without fact-checking is easily identified as a part of a moral panic (Cohen, 2002; Goode & Ben-Yehuda, 2010, 2011).

Criticism of the then existing laws in Germany is also prominent and at one point, not only experts from the archaeological field, but also politicians such as then state minister of culture Monika Grütters, are quoted in articles to promise a change on this front (Zimmermann & Timm, 2014). This is consistent with the stage postulated by Cohen (Cohen, 2002, p. 1), in which "right-thinking people", such as politicians, "man the moral barricades" to deal with the threat. Later in 2015, and into 2016, the reporting somewhat refocuses on the cultural property law amendment announced by Grütters. After the adoption of this law, some commentary is seen ('Museumschef Hilgert zu Kulturgutraub', 2016), but the number of articles on antiquities trafficking from Syria dwindles rapidly. The whole process reflects the stages of moral panic following Cohen's "processual" model (Cohen, 2002; Critcher, 2008).

We can also see several elements of moral panic following the "attributional" model in the reporting during the time between 2014 and 2016: a heightened sense of *concern*, a striking *disproportion* in the market figures attributed to the illicit antiquities trade (even compared to the already exaggerated numbers in earlier articles), as well as a certain *consensus*, which can be seen over a variety of newspapers and authors dealing with the topic. The *hostility* toward, not only the terrorists, but also antiquities dealers and collectors is another element that is increasingly prominent. With the topic rapidly vanishing out of the newspapers again, the last element, *volatility*, is also present. It follows, then, that this episode represents a moral panic, following both explanatory models of Cohen (2002) and Goode and Ben-Yehuda (2010, 2011).

It is noteworthy for this thesis that this moral panic has not only one but two folk devils. Firstly, it's the Islamic State terrorists who not only destroy antiquities, but also sell some of them to finance their continued campaign of destruction and murder. Secondly, however, the blame is laid on the antiquities market, that is, dealers and collectors in North America and Europe, specifically Germany, who allegedly finance the terrorists by their demand. A class of people that is seen as "ultimately responsible" for the problem posed by the primary folk devil, and thus can become a folk devil themselves, is not uncommon in a moral panic, as has been noted in the introduction to the 3rd edition of Cohen's original study (Cohen, 2002, p. xxvii).

To get a fuller picture of the consequences of this moral panic, in the next chapters I take a closer look at the amendment of the German cultural property protection legislation, which was reported

on in the wake of this media moral panic, and adopted in 2016. This law amendment came with a rather public debate which included several groups of stakeholders.

Furthermore, the "secondary" folk devils of this moral panic, that is, German antiquities dealers and collectors, were also stakeholders in this debate, and very vocal in their reaction both to the media portrayal of their trade, and the new legislation. To contextualise the media reporting with both the debate around the law amendment, and the reactions from the antiquities trade, I transformed the trends and themes identified in section 4.2. into deductive codes to analyse the datasets presented in Chapter 3. These texts were used to help better understand the impact of the media reporting on other stakeholders in the discourse around illicit antiquities in Germany. The results of this coding contextualisation are presented in Chapters 5 and 6.

5. CONTEXTUALISATION OF LEGAL CHANGES

It has been shown in the previous chapter that a moral panic, namely, the media exaggeration, amplification, and distortion of a perceived problem, has happened in Germany between 2014 and 2016 with the trafficking of antiquities and specifically, the implication of the antiquities trade in the financing of the terrorist group Islamic State (IS). This reporting was accompanied by repeated calls from experts and journalists for authorities to react to this problem, either with new laws, or a stricter enforcement of the existing ones.

5.1 Introduction to legal changes in Germany, 2007–2016

Criticism of the existing laws, and calls for a stricter regulation of the illicit antiquities trade have been a feature of the reporting on antiquities trafficking in Germany since at least 2005, before Germany's ratification of the 1970 UNESCO Convention in 2007 and the subsequent adoption of the so-called *Kulturgüterrückgabegesetz*, "cultural property restitution law", which was aimed to implement the convention. However, the *Kulturgüterrückgabegesetz* was harshly criticised as ineffective by archaeologists, who called for stricter rules, e.g., in newspaper interviews (Doering, 2007). These calls were then seemingly answered by the *Kulturgutschutzgesetz*, "cultural property protection law" (KGSG) of 2016, an amendment of the 2007 legislation. Calls for action to the authorities, and a reaction by the authorities are integral stages of a moral panic following Cohen (2002).

This chapter contextualises the moral panic in the media with the legal changes, which were widely seen as the authorities' reaction to the public calls for action. To this end, I analysed a selection of texts from the legal and market spheres through coding, using the key themes identified in the media analysis as deductive codes. These were: A transition from words that frame antiquities as "art" to those that frame them as "cultural heritage", emotional language (covering in part *hostility*, which is an element of moral panic following Goode and Ben-Yehuda (2010)), references to terrorism and organised crime, disproportional figures, and criticism of the existing legal measures taken against antiquities trafficking.

To introduce the legal situation, I first give a short overview of the 2007 legislation, and the German government's official evaluation report from 2013, to establish the background on the 2016 amendment of the law into the *Kulturgutschutzgesetz* (KGSG). I then analyse three texts dealing with this amendment through coding: the session protocol of the debate in the cultural committee (*Ausschuss für Kultur und Medien*) of the *Bundestag*, which preceded the adoption of the

amendment's final version (Ausschuss für Kultur und Medien, 2016), the final text of the KGSG (KGSG, 2016), and the official press release by the ministry attached to it (*Die Neuregelung des Kulturgutschutzrechts*, 2016).

I analyse how the media reporting on looting in Western Asia may have influenced policy makers and other stakeholders in Germany and consequently, the laws that were adopted. While the stages of moral panic could be identified already in the sudden peak and subsequent ebbing of the topic of antiquities looting and trafficking in the newspapers between 2014 and 2015, a crucial factor that defines a moral panic is the call for the authorities to "do something"—e.g., enact stricter laws—and their reaction to these calls (Cohen, 2002; Critcher, 2008; Garland, 2008).

Later in this chapter, I contextualise the 2016 amendment of the German cultural heritage law with the key themes and trends that emerged from the media analysis, to compare to their prominence in the media reporting. It is shown how these themes reflect the moral panic through coding to identify how prominent which theme is in the debate on the 2016 law amendment, as well as their presence later in the law itself and in the law's presentation to the public.

Before the 2016 amendment of the legislation is contextualised with the unfolding moral panic, however, its predecessor law from 2007, the stated aims of that law, and the emerging criticisms of its shortcomings, are presented in the following section.

5.2 Germany's cultural heritage law of 2007

As shown in Chapter 4, calls for stricter laws against the trafficking of illicit foreign antiquities in Germany have been part of the reporting on looting at least since 2005. The first German legislation aimed to combat the trade with looted and illegally exported foreign antiquities was adopted in 2007, after Germany's ratification of the 1970 UNESCO Convention.

In 2013, an evaluation report on this law was published by the German government, finding it lacking in fulfilling its purpose amid growing concern about looting, especially in Syria. In 2016, legislators answered the call in this report for an amended cultural heritage law with the *Gesetz zur Neuregelung des Kulturgutschutzes* ("law for the revision/new regulation of the protection of cultural heritage"), or *Kulturgutschutzgesetz* ("cultural heritage protection law"), KGSG. In addition to protecting foreign cultural heritage from being trafficked in Germany, both the 2007 legislation and its 2016 amendment also aimed to protect important German cultural heritage from export. In 2007, Germany ratified the 1970 UNESCO Convention On The Means Of Prohibiting And Preventing The Illicit Import, Export and Transfer Of Ownership Of Cultural Property, followed by a law to implement it, called *Kulturgüterrückgabegesetz*, "Cultural Property Restitution Law". The

ratification came following repeated calls for better protection of foreign cultural heritage in reaction to the widely-publicised images of looting in Iraq after the invasion in 2003, and reports of illicit antiquities sales on the internet. The *Kulturgüterrückgabegesetz* marks the first German legislation aimed at protecting foreign cultural heritage traded within Germany. Like its later amendment, it aimed to both protect German cultural heritage from export and prevent the trade in illegally exported antiquities from outside the country. At the same time, its stated aim was to protect the German art and antiquities trade from "disproportional costs and competitive disadvantages" in comparison to other market countries. As such, it has been called "a political compromise from the start" (Neumann, 2013). Even before the adoption of the 2007 law, some commentators had criticised the proposal as likely ineffective to stem the illicit antiquities trade (Müller-Karpe, 2006). The law ruled that an artefact had to be restituted to a claimant state, that is, the presumed country of origin, if it had entered Germany after the effective date of 1992, and within a year of learning of its whereabouts by the claimant state. By the time the law was amended, no artefact had been repatriated to its country of origin under this law. While there had been several cases of restitution of illicit antiquities seized in Germany, these were not restituted in response to court orders, but as gestures of diplomacy between Germany, and the country of origin.

5.2.1 The evaluation report of 2013

In 2013, an evaluation report on this law was published by the German government, specifically the state ministry for culture and media (Neumann, 2013), which is included as background for the following analysis as it marks the official recommendation to change the existing law. In his personal preface to the report, then state minister for culture (*Staatsminister für Kultur und Medien*) Bernd Neumann, notes that upon the adoption of the 2007 law, it was agreed that it should be subject to an evaluation three years after implementation, thus, the evaluation period had started in 2010.

The report concluded that the ratification of the 1970 UNESCO Convention and adopting a corresponding law had been the right step, invoking the appeal to a common world heritage: "Dabei geht es nicht nur um Kulturgut, das für den Herkunftsstaat von nationaler Bedeutung ist, sondern um den Schutz des kulturellen Erbes der Menschheit."—"This case not only concerns cultural property that is of national importance for the origin countries, but also the protection of the cultural heritage of all humanity." (Neumann, 2013, p. 3). The same paragraph also repeats the unsubstantiated claim that antiquities represent the third-largest illicit market worldwide, citing "international organisations" as its source. This phrasing seems nebulous, but cannot be denied

altogether, as the claim has been around for much longer than 2013 (Yates & Brodie, 2023). This claim is given as one of the reasons why it was the right decision to ratify the convention and create a law to stem the illicit antiquities trade. The report also makes a reference to looting in Syria and Mali, two then-recent conflicts with widely publicised cases of antiquities looting (Brodie, 2022; Brodie & Sabrine, 2018; Herman, 2018). The report seems in tone remarkably similar to the media reporting on looting and trafficking around the time it was published. Despite not yet reaching the frequency of articles on conflict-related cultural looting that would mark late 2014 and early 2015, the national newspapers had taken a notable interest in the threat to Syrian cultural heritage and antiquities during 2012. There is a clear sense of *concern* for cultural heritage in the report, which is one of the early markers for a moral panic, corresponding to the identification of a threat, the first stage of moral panic following Cohen (2002). Later, the report acknowledges explicitly that *concern* for cultural heritage is, at the time in 2013, at an unprecedented high in the public discourse (Neumann, 2013, p. 21).

Further, it is noted that according to official statistics by the German Federal Statistical Office (*Statistisches Bundesamt*), the implementation of the law has not had any notable effect on the antiquities market in Germany (Neumann, 2013, p. 4). The evaluation report states this fact as one of the ways in which the law succeeded, rather than an indication that it might have failed in its purpose of protecting cultural heritage and implementing the 1970 UNESCO Convention. However, the author also notes that the purchase of unprovenanced antiquities was still widespread in Germany, and no illegally excavated and exported antiquity had been restituted under the evaluated law (Neumann, 2013, p. 5).

The report then goes on to state that there remained, in 2013, a need for improvement on the legal framework for cultural heritage protection in Germany. One of the reasons given is the fact that there had not been a single case of restitution of cultural objects under the restitution law to date in 2013, despite several claims for restitution from origin countries. The evaluation report states that the requirements for restitution to be met by claimant states/origin countries were too high in the 2007 law, which made it essentially impracticable for its stated purpose (Neumann, 2013, p. 5). It is also noted that this factor had put a strain on Germany's bilateral relations with a number of origin countries of antiquities, whose claims had been rejected under the law. Thus, the report concluded that an amendment of the cultural heritage protection law was "urgently needed"—"dringend erforderlich" (Neumann, 2013, p. 8). The report then goes on to make suggestions for an amendment of the then-effective law, comparing it to legislation in several other countries. It is thus evident here that the amendment was recommended (and presumably planned) before the peak of the media attention on antiquities looting and trafficking, which was closely linked to the

media attention on the terror group IS at the height of their power, beginning in the second half of 2014. The actual amendment of the law in 2016, however, falls after this peak, and thus interacted with the public discourse on cultural heritage and antiquities trafficking.

5.3 Key trends and themes in crafting the law of 2016

In Chapter 4, I analysed the reporting on archaeological looting in Western Asian conflict zones, predominantly Iraq and Syria, by German media. The analysis showed some trends that are indicative of a moral panic. One of these is the sharp peak in media interest around 2014 and 2015, which died down only a short time later. This was also the time when then state minister for culture, Monika Grütters, announced an amendment of the then-current law from 2007. As discussed in the preceding section, the necessity for an amendment had been determined already in the evaluation report from 2013, but the crafting of the new legislation coincided with a peak in the news media's interest in the topic of antiquities trafficking.

The following analysis contextualises the protocol of a public discussion session in the cultural committee of the German parliament *Bundestag* with the media reporting leading up to this point in time (Ausschuss für Kultur und Medien, 2016). I did this by coding the word protocol PDF published after the session, using the key trends and themes emerging from the media analysis as my deductive codes. This public session marked the final consultation of experts and stakeholders whose statements were considered before the finalisation of the law text. The wording of the law and its corresponding press statement were also analysed to show how the themes from the discussion were reflected in the final form of the legislation.

I judged these three texts, the discussion protocol, the law itself, and the press statement, fitting to show a reflection of the moral panic visible from the newspaper articles in the actual legislation itself, and how that legislation is presented to the public. Of the three, the protocol of the cultural committee session is by far the most extensive, and reflects the viewpoints of the different stakeholder groups. I used it to see whether the stakeholders from the market, law, law enforcement, and the cultural sector frame their concerns in similar terms as the media of the time, and also, how the different groups are represented. I then cross-referenced the protocol with the law itself.

The press statement associated with the adoption of the KGSG can be seen as a direct reaction to calls for action both from the media and the general public, presenting the new legislation as an answer to them. It is important to see how the amendment of the cultural heritage protection law is framed for the press, and thereby how it reflects the law in light of the moral panic, which preceded at least the last debates, if not the planning of the amendment.

The discussion session around the amendment of Germany's cultural heritage protection law included a number of different stakeholder groups. After the initial proposal of the bill in late 2015, professionals from museums, auction houses, antiquities trade associations, culture foundations, law firms, and law enforcement were called to comment on the draft legislation as "expert witnesses" ("Sachverständige"). On the 13th of April 2016, these experts were invited to a public session of the cultural committee of the *Bundestag* to discuss their answers. Its protocol is the most extensive record of an extended debate on the law, and several of the suggestions made during the session were included in the final law text, as will be shown in the following sections. The session was exceptionally well attended, as is noted in the session protocol. Not only the cultural committee was present in full, but also many other members of parliament, including the then-current president of the parliament (*Bundestagspräsident*), and many members of the public. While, as shown above, an amendment of the law had been recommended as early as 2013, it is likely that the unusual interest in the matter was partly stoked by the preceding media attention on antiquities trafficking. The expert witnesses that were present in the session each gave their statements, after which the discussion was opened to the members of the committee. Present were:

- Christoph Andreas, of the Association of Galleries and Art Dealers (Bundesverband Deutscher Galerien und Kunsthändler e.V.),
- Johanna Eder, head of the association of German scientific research museum (Deutsche Naturwissenschaftliche Forschungssammlungen - DNFS),
- Markus Eisenbeis, managing partner of the auction house Van Ham in Cologne and vice president of the Association of German Art Auctioneers (Bundesverband Deutscher Kunstversteigerer - BDK),
- Harald Falckenberg, collector and professor of art theory at the Hamburg art school,
- Dorothee Hansen, deputy director of the Bremen art gallery (Kunsthalle Bremen),
- Markus Hilgert, director of the Vorderasiatisches Museum (VAM), Berlin,
- Silvelie Karfeld, Detective Chief Inspector (Kriminalhauptkommissarin) at the German Federal Criminal Office (Bundeskriminalamt, BKA),
- Robert A. Kugler, lawyer at the firm Höly, Rauch & Partner, Berlin,
- Sophie Lenski, chair of constitutional and administrative law, media law, art and culture law at Constance University,
- Arnold Nesselrath, deputy director of the Vatican Museums and professor of art history at Humboldt-University Berlin,
- Kerstin Odendahl, managing director of the Walther-Schücking-Institute for international law at Kiel University,

- Isabel Pfeiffer-Poensgen, secretary general of the culture foundation for the German federal states (Kulturstiftung der Länder),
- Kristian Nicol Worbs, president of the German Numismatic Society (Deutsche Numismatische Gesellschaft - Verband der Deutschen Münzvereine - DNG),
- Olaf Zimmermann, managing director of the German Cultural Council (Deutscher Kulturrat).

This group of expert witnesses consisted of four persons representing interests of market and collectors (Anders, Eisenbeis, Falckenberg, and Worbs), four representing those of museums and art galleries (Eder, Hansen, Hilgert, and Nesselrath), two speaking for culture foundations (Pfeiffer-Poensgen and Zimmermann), two experts in legislation (Lenski and Odendahl), one representative of law enforcement (Karfeld) and one person speaking as a practicing lawyer (Kugler). It should be noted that, with regards to attitudes towards the import of potentially looted antiquities, there was only one expert for Western Asian antiquities (Hilgert), who arguably had a different perspective than those museum experts representing fine and contemporary art galleries (Hansen and Nesselrath). It may be argued that Hilgert, together with Karfeld, speaking for the federal police, and Kugler, speaking for a law firm that also represented Mexico in several restitution claims, made up three voices speaking for stricter control of the trade in unprovenanced antiquities, faced with six voices speaking for laxer control of the trade.

While each of these representatives had a slightly different area of expertise, it is notable that, with four voices speaking for the antiquities market and collectors, there was only one person from the field of law enforcement speaking at the session, as well as only one expert on Western Asia. In this context, it is also notable that the four representatives from the museum sector spoke for fields with vastly different needs when it comes to a cultural heritage protection law, representing collections of scientific material (Eder), modern art (Hansen), fine art (Nesselrath) and ancient Western Asian artefacts (Hilgert). This composition may have had an influence on the focus of the debate.

The following paragraphs summarise the reflection of the key trends and themes from the media analysis in the protocol of that discussion, as well as the law text, and the press statement.

5.3.1 From art to heritage

One result that emerged from the media analysis is the detection of an overall change in the lexical choices made by journalists to describe antiquities. When before 2012 the words used in this context usually came out of the spheres of either "art" ("Kunst", "Kunstgegenstände", "Raubkunst" etc.) or "treasure" ("Schätze", "Kunstschätze" etc.), the phrasing starts to gravitate more towards "cultural heritage" ("Kulturerbe", "Kulturgüter") from that time onward (see section 4.2., and

Appendix). Often Western Asian antiquities are designated as "common" human heritage, which then serves as an appeal to their protection, just as it has been in the report on the 2007 legislation. The shift in perspective is important in the context of moral panic as the newer wording frames the act of looting archaeological sites as an immediate threat to the audience's interests, that is, *their* heritage as well. I coded the three texts to see how prominent the appeal to a "common", "shared" or "world heritage" is in the context of the amendment of the law. I also included references to the 1970 UNESCO Convention here due to the fact that the convention states as its purpose the protection of cultural property. While "cultural property" ("Kulturgut") and "cultural heritage" ("Kulturerbe") are not exactly synonymous either in German or English, they are often used interchangeably to describe the same object categories. The use of "cultural heritage" has been promoted by some scholars over the use of "cultural property" due to the latter's inherent material meaning more recently (Brown, 2004; Creamer, 2024; Fincham, 2010; O'Keefe & Prott, 1992), while the 1970 UNESCO Convention uses the term "cultural property". In the session protocol, references to antiquities as cultural heritage (as opposed to art objects) are mostly tied to the 1970 UNESCO Convention, and references to the implementation of the Convention are used as a stand-in for the protection of cultural heritage.

It is notable that in the public meeting of the cultural committee preceding the finalisation of the law, the term "cultural property of national value" ("national wertvolles Kulturgut") was discussed at length in order to find a working definition, as this term had not been defined by the preceding laws dealing with the protection of German cultural heritage. Finding a working definition for this term was deemed necessary by the committee, as the law would include a database of objects deemed cultural property of national value, which would be banned from export. This would apply only to specific, individual artworks, antiquities or other artefacts, not whole categories of objects. A term mentioned several times in this context is *identity*, meaning that these outstanding heritage objects are crucial or foundational to Germany's cultural identity in some way ("identitätsstiftend"). The appeal to identity occurs eleven times in the discussion of the cultural committee, once in the law itself and three times in the short press statement. It is never exactly defined, however, what makes an object relevant to national identity, in either of these texts. The discussion about which archaeological, scientific, and art objects may count as national cultural heritage, and thus relevant to national cultural identity, in order to retain them inside of Germany, is based on the goal to protect national cultural heritage from export. This goal also occurs in the legislation of many other countries, albeit usually on a broader scale, while the KGSG permits an export ban only on a case by case basis. This effectively leaves defining an object as relevant to German cultural identity to

those who judge the individual cases, despite the fact that the attempt to define the term was made quite prominently during the discussion.

The appeal to protect "world heritage" is much less evident in the experts' statements. This is perhaps somewhat surprising in light of the media debate on trafficked Western Asian antiquities preceding this particular lawmaking process, which mentioned the notion of common human heritage several times. In fact, the only person to appeal to a notion of "common human heritage" in the cultural committee session, is Markus Hilgert, who was then director of the *Vorderasiatisches Museum* (VAM) Berlin and was the only expert of ancient Western Asia present, in his opening statement. He stresses the role of cultural objects for the historical sciences ("das Fundament, auf dem die wissenschaftliche Erschließung der Menschheitsgeschichte steht"), but then goes beyond this aspect to express the notion that cultural heritage (in general) serves to give cultural identity and orientation, and especially in times of conflict can give "hope for reconciliation in society" ("wecken die Hoffnung auf gesellschaftliche Aussöhnung"). He does not mention the idea of "world heritage" by name but seems to be speaking about a general value of heritage for society, both on national and international levels. As such, the appeal to a "common human heritage" is, if anything, rather muted compared to the wordings found in many newspaper articles on the same topic, as well as compared to the 2013 government evaluation report for the predecessor law.

Several other representatives also make a distinction between objects deemed "cultural property" ("Kulturgut") in the sense of the law (such as antiquities and scientific samples) and other goods due to their inherent immaterial value. This value is stressed in several statements not only as a distinction to the material value, which can in itself be quite low in archaeological artefacts as well as scientific samples, but also in its relevance to history, culture, and knowledge.

The 1970 UNESCO Convention is mentioned five times in the discussion preceding the final draft of the bill, three times by Markus Hilgert in his statement, reminding the audience of the signatory states' mandate to craft effective legislation for its implementation. He calls it Germany's "moral obligation according to international law" ("moralischen und völkerrechtlichen Verpflichtung"). The next mention of the UNESCO Convention comes from the lawyer Robert Kugler, who was the only practicing lawyer present as a specialist witness in the meeting, noting again Germany's obligation under international law to implement it. It is noteworthy here that Kugler's employer, the Berlin law firm Höly, Rauch & Partner also represented the country of Mexico in several then active restitution cases. The last mention, by Kristian Nicol Worbs, president of the German Numismatic Society (*Deutsche Numismatische Gesellschaft*), who, in contrast, stresses the importance of the exchange of cultural goods for scientific, cultural and educational reasons ("zu wissenschaftlichen, kulturellen und erzieherischen Zwecken"), also noted in the preamble to the 1970 UNESCO Convention.

Worbs' aim in his statement appears to be to ensure an exemption from export and import bans for coins in particular. As will be discussed below, the law then does indeed make coins exempt from the rules specified for other antiquities. The law text itself mentions the UNESCO Convention three times, to clarify that any artefact defined as "cultural property" by the convention is subject to restitution upon request of a signatory state, if considered culturally significant or inalienable by the signatory origin country.

From the coding analysis of the cultural committee session, the law text, and the press statement, it can be seen that antiquities are almost exclusively described as "cultural property" ("Kulturgut") or "cultural goods" ("Kulturgüter"), both of which are also used, as an umbrella term, for other object categories, such as fine art and scientific samples. On the one hand, this stresses the inherent immaterial value of these object categories, and on the other, keeps the terminology consistent in the law. There are only a few references to a "shared human heritage", and no indication of the conflation of antiquities with "art" and "treasure", which had been seen earlier in the media analysis. As such, these texts may reflect the shift from "art/treasure" to "cultural heritage/property" that had already been fulfilled in the media by that time (2016). It can also be an indication that the people involved in the lawmaking process were striving for a consistent and objective wording. The lexical choices made in the three analysed texts do not show any direct signs of moral panic with regard to this terminology.

5.3.2 Emotional Language

One of the key themes identified in the media reporting was a regular appeal to the reader's emotion, often achieved through graphic descriptions of looting, or specific lexical choices. This section assesses whether the same emotional language is used by stakeholders in the policy making. There are some references to the past public discourse on the topic of the planned legislation in several statements, including the introduction to the cultural committee session by its moderator. The moderator says that the tone of the debate has been "emotional, and at times even hostile" ("eine sehr engagiert geführte, auch sehr Streitig geführte Debatte").

As mentioned above, Markus Hilgert appeals to Germany's "moral obligation" ("moralische Verpflichtung") to adopt a law effectively implementing the 1970 UNESCO Convention in his opening statement at the cultural committee, using quite urgent, and thus emotional, language. He points to the importance of cultural objects to historical science, calling them the "foundation, on which rests the scientific study of human history" ("das Fundament, auf dem die wissenschaftliche Erschließung der Menschheitsgeschichte steht"). He adds that they are also "signposts of cultural

diversity, monuments of tolerance and catalysts for the development of pluralist civil societies" ("Wegweiser kultureller Vielfalt, Mahnmale der Toleranz und Katalysatoren für den Aufbau pluralistischer Zivilgesellschaften"), thus placing a more emotional, immaterial value on antiquities. In the later discussion, Hilgert also notes that putting a monetary value on cultural objects is contrary to the mindset of a scholar, i.e., himself ("Als Wissenschaftler und als Museumsleiter ist es mir völlig fremd, Werte an archäologische Kulturgüter zu knüpfen."). His wording implies that the practice of estimating the value of cultural objects in monetary terms is in itself unscientific and possibly amoral.

The placement of inherent immaterial value on works of art and antiquities is present, but appears somewhat less charged with emotions in the choice of words by other discussants. Lawyer Robert A. Kugler notes that the immaterial properties of antiquities, which he calls archaeological cultural goods, up to this point had been insufficiently represented by law ("haften archäologischen Kulturgütern immaterielle Eigenschaften an, die rechtlich bisher nur unzureichend abgebildet wurden"). Isabel Pfeiffer-Poensgen, secretary general of the culture foundation for the German federal states (*Kulturstiftung der Länder*) explains the discrepancy between material and immaterial values of cultural objects as being "not incredibly expensive, yet incredibly important" ("gar nicht so wahnsinnig teuer und trotzdem wahnsinnig wichtig."). Arnold Nesselrath states that "the importance of the cultural property protection legislation cannot be valued highly enough" ("die Bedeutung des Kulturgutschutzgesetzes kann nicht hoch genug eingeschätzt werden"). As such, there is some emotional, or at least, emphatic language around the topic of antiquities.

Another example of emotional language is that used by the various representatives of the antiquities market. The market actors present as expert witnesses in the cultural committee session appeal to the lawmakers' pity on the honest antiquities dealers, whose business model would supposedly be rendered untenable by the proposed law. Kristian Nicol Worbs, representative of the German Numismatic Society (*Deutsche Numismatische Gesellschaft*), an umbrella association of coin collectors and numismatists, points specifically to the importance of studying (and, by extension, collecting) ancient and modern coins to the protection of cultural heritage and public education, as noted above. Art market fears of expropriation and unfair criminalisation are evident in the statements of several art market representatives, with a total of ten mentions of the fear of expropriation and being forced out of business. Besides the fear of not being able to sell fine art pieces internationally due to the proposed laws against the export of culturally significant art from Germany, Christoph Andreas, representative of the Association of Galleries and Art Dealers (*Bundesverband Deutscher Galerien und Kunsthändler e.V.*), makes the claim that higher standards of due diligence and investment of time and "millions of" money in provenance research would

render the trade in art created before 1945 unfeasible ("Wenn wir mit den erhöhten Sorgfaltspflichten hier Millionensummen in die Provenienzforschung hineinstecken und über Jahre – bei mäßigem Erfolg – forschen müssen, ist der Kunsthandel mit Werken von vor 1945 in Deutschland nicht mehr möglich."). Markus Eisenbeis, speaking for auction houses at the cultural committee session, claims that the proposed due diligence rules would lead to a "wave of quasi expropriations of collectors and museums" ("Nimmt man § 33 beim Wort, hätte der Herausgabeanspruch eine Welle von Quasi-Enteignungen bei Sammlern und Museen zur Folge."). The statements about antiquities trafficking regulation also tend to come with a marked emphasis on a dichotomy of "honest" and "dishonest" antiquities dealers. This distinction is made five times in some form in the cultural committee session protocol, for example by Markus Eisenbeis and Sophie Lenski, Professor for cultural law at Constance University. Lenski opines that the proposed legislation would put too much of a burden on the honest traders, while leaving too much leeway for the dishonest ones ("hier sehe ich die ehrlichen Händler manchmal viel zu stark belastet, für die unehrlichen Händler bleibt da meiner Meinung nach noch zu viel Spielraum"). As noted in Chapter 2, this clear dichotomy between honest and dishonest dealers does not exist in the antiquities market (Brodie, 2019a; Mackenzie et al., 2019; Mackenzie & Yates, 2017). The insistence on it, however, is crucial to the argument of antiquities market actors against stricter rules for handling unprovenanced material, as will be shown in Chapter 6, dealing with the reactions of the market to the media portrayal and changing legislation.

The fact that the debate in the cultural committee session included a lot of rather emotional lexical choices reflects, partly, the emotionality of the preceding media reporting on antiquities. It lacks, however, the hostility towards market actors. Concern for antiquities and other forms of cultural heritage can be seen from a number of quotes, but there is overall little that points towards a moral panic in the analysed texts around the 2016 law amendment.

5.3.3 Terror financing and organised crime

At the peak of media attention on antiquities looting and trafficking, between late 2014 and early 2015, the reporting on this topic became more and more conflated with that on the financing schemes of the terror group IS. As Chapter 4 shows, the media made the connection between Islamist terrorism and antiquities trafficking even earlier, starting with the report that 9/11 terrorist Mohammed Atta allegedly tried to sell antiquities to a German scholar ('Kunst als Terrorfinanzierung?', 2005). Where terrorism does not fit into the narrative—e.g. when the topic is antiquities trafficking from regions not in Western Asia—the media often mention organised crime

as a possible profiteer of the trade. In the discussion on the Cultural Property Protection Law, however, mentions of a supposed danger of the financing of terrorism and organised crime through antiquities trafficking were rare. In the statements of the "expert witnesses" ("Sachverständige") opening the cultural committee session of April 2016, only Silvelie Karfeld made the connection of the illicit antiquities market to terrorists and organised crime. Karfeld, Detective Chief Inspector (*Kriminalhauptkommissarin*) with the German Federal Police Office (*Bundeskriminalamt*, BKA), was the only representative for law enforcement present among the expert witnesses. She closed her statement with the warning that "not only organised criminals profit [from antiquities trafficking]. There is growing evidence that extremist organisations partly fund their war effort and the oppression of the population with it."—"Es bereichern sich jedoch nicht nur organisierte kriminelle Vereinigungen. Zunehmend verdichten sich Informationen, dass extremistische Organisationen ihren bewaffneten Kampf und die Unterdrückung der Bevölkerung damit in Teilen finanzieren." [emphasis mine]. This statement is already more carefully worded than most allegations printed in newspapers. The law itself makes no reference to this aspect of the discourse. However, the press statement about the law amendment, released in early 2016, does. Referencing Syria, Iraq, Mali, and Yemen, the statement alleges that "the looting of cultural sites and the illegal trade with cultural goods are often financial sources for terrorist groups"—"Die Plünderung von Kulturerbestätten und der illegale Handel mit Kulturgütern ist dabei häufig auch Finanzquelle terroristischer Vereinigungen." (*Die Neuregelung des Kulturgutschutzrechts*, 2016) [emphasis mine]. Note that the press statement makes this supposed connection appear far stronger than Karfeld did. This discrepancy, emphasised here, reflects the prominence of the role of the talking point terror financing in the media discourse about antiquities trafficking, as opposed to its role in observable data (Sabrine et al., 2022). In this aspect, the press statement is a direct continuation of how the issue was portrayed in the media, while the actual law and the related discussion broke markedly from this mould. The latter is perhaps unsurprising in light of the fact that the amendment was planned before the media attention began to focus on the supposed terror financing through antiquities trafficking. It is, however, remarkable that the press statement uses the same framing as the preceding media moral panic.

The focus on terror financing through antiquities trafficking is strikingly absent from the discussion around the 2016 law amendment. In the cultural committee session, the topic was mentioned only once, and in the law itself not at all. The fact that the press statement then puts an emphasis on this topic suggests that, while the moral panic did not play a major part in the lawmaking process, it was used to draw attention to the new legislation.

5.3.4 Disproportional figures

Market figures regarding the trafficking of looted antiquities are not mentioned in the three analysed texts. This can potentially be explained by the fact that claims made in the media coverage about how high those figures exactly are varied widely. However, this is another notable discrepancy between the public discourse in the media and the debate in the lawmaking process, which may again be explained partly by the fact that the necessity of the amendment was discussed already before the antiquities-trafficking-related moral panic that was visible in the media took place.

Unlike in the newspapers, antiquities and other cultural goods are discussed more in terms of their artistic and scientific, than their monetary value in the debate before the adoption of the law, the law itself, and the related press statement.

The fact that an essential element of moral panic, *disproportion*, is absent from the lawmaking process, suggests that this process took place somewhat removed from the actual moral panic, which happened in more public-facing media. This can be explained by the fact that the law amendment was planned before the moral panic happened. Still, as above, the amendment may have drawn more public attention due to the heightened interest and anxiety sparked by the moral panic.

5.3.5 Criticism of the (existing) legal condition

Several parties voice criticism of the existing law and express a need to change the legislation. Market parties express the concern that the lack of clarity in the proposed bill might lead to foreign traders avoiding the German market, which in turn would lead to a loss of income for German dealers. It is noteworthy, while not surprising, that the statements of the only two experts from practicing law and law enforcement, Kugler (as a lawyer for a claimant state, that is, presumed origin country, in several restitution cases) and Karfeld, are in agreement about the need for a stricter regulation of the trade in antiquities, while different market actors warn against stricter due diligence rules, for example, Christoph Andreas and Markus Eisenbeis (see above).

Kugler and Karfeld also agree with the experts from archaeology and science, like Hilgert and Eder, speaking for museums, in that a clearer distinction has to be made between archaeological artefacts and scientific samples, and other cultural objects, namely fine art produced for the art market. The law later addresses this partly, to protect even those archaeological objects and scientific samples that do not have a high monetary value but excludes coins from the protected category. This exception was presumably made in reaction to a statement by the president of the association of coin collectors at the committee session, Worbs, whose demands are taken over almost verbatim into the law text.

As mentioned above, it is stated in the law text that the purpose of the KGSG is to implement the 1970 UNESCO Convention. Since this was also the purpose of the 2007 law, the press release explicitly admits that the preceding legislation had been lacking in this regard, saying that "previously existing rules have proven ineffective" ("Die bisher existierenden Regelungen haben sich nicht als effektiv erwiesen."). Overall, there is some criticism in the law text regarding the previous legal condition, however, it is used mainly to give a reason and a background for the amendment of the law.

Much like in the media, the predecessor law from 2007 is criticised as ineffective against antiquities trafficking, both by some discussants in the cultural committee session, and in the preamble to the law itself. This is hardly surprising, as the evaluation report on the 2007 law already recommended an amendment on this basis (Neumann, 2013). As such, this criticism is not necessarily a sign that the debates around the lawmaking process are part of the moral panic, but it certainly reflects this theme. Notably, stakeholders from the market side take a different stance from those who criticised the previous law, warning that the new law could prove disastrous to the antiquities market. This warning reflects fears of expropriation that come up in the market reactions and are analysed in the next chapter.

5.4 Summary of the legal analysis

In summary of the findings from my analysis of three text documents closely connected to crafting the cultural property protection law KGSG, it is notable that the themes of terror financing and high market values for the illicit antiquities trade, which were prominent in the media reporting, are almost absent from the discussion preceding the adoption of the law in its final form, as well as the law itself. Terrorists are, however, mentioned in the press release published to accompany the new legislation. Thus, one of the elements of moral panic, *disproportion*, is apparently absent from the lawmaking process, with the most prominent *folk devil* from the media portrayal being much reduced in prominence. The emotionality, and, at times, *hostility* of the preceding media discourse, is mentioned several times in the debate, albeit not prominent in the discussion itself.

Emotional language features a little differently in the lawmaking process, for example, in appeals to the inherent immaterial importance of art and cultural heritage objects that may surpass their financial value. There are frequent appeals to national cultural heritage and specifically, its importance to national identity, in all three of the analysed texts.

Quite prominent in the discussion are the fears of the art market regarding the new legislation, most notably of being pushed out of business through new, allegedly impossible-to-follow due diligence

regulations. This is another example of emotional language, but going in the opposite direction of the moral panic that has been identified in the media analysis. Moreover, market actors insist on a clear distinction between "honest" and "dishonest" traders in the antiquities market, warning that the former would be unfairly disadvantaged through new regulations on their trade. As has been pointed out, this clear distinction does not hold up to scrutiny, but the morally-charged phrasing can be clearly identified as an appeal to the lawmakers' emotions. This may be interpreted as part of a backlash to moral panic.

As a whole, the moral panic that was so easily visible from the media analysis, does not seem to be reflected closely in the lawmaking process. For one, the peak of media attention on antiquities trafficking was rather closely connected to the terror group IS and their supposed profits from looting and trafficking Syrian and Iraqi antiquities. The amendment of the cultural heritage protection law, however, had already been planned before IS was a major media topic between 2014 and 2015. The evaluation report on its predecessor recommended an amendment in 2013. While not focusing on terrorism or any specific group, the evaluation report does mention archaeological looting in conflict regions and by combatant groups as a special reason for concern. The theme of conflict-related looting seems less prominent in the actual lawmaking process than in public-facing documents. The supposed terrorism connection is almost absent from the cultural committee discussion on the new legislation. Other important markers of a moral panic, such as the disproportional figures relating to the illicit antiquities trade encountered in the media portrayal, were completely absent. The press release, however, takes up the theme of terror funding again, also mentioning conflict-related looting in a number of countries.

Thus, it seems like the legislation is less a result of the moral panic (because it was already planned before the moral panic reached its peak), as it was using the moral panic for publicity. The media attention quickly died down after the adoption of the new legislation. One may speculate whether an assumed reaction by authorities to the calls for action in the media may have contributed to this. That would suggest the last stage of a moral panic following Cohen (2002). Regardless of this, it seems like there is more to the changes in legislation than just the direct reaction to a moral panic about antiquities trafficking and terror financing. However, when in 2017 a new EU regulation was introduced to limit the illegal import of cultural goods (European Commission, 2021), the argument of terrorist financing was used once again in the press statement released about the planning of this regulation (*Commission Presents Action Plan to Strengthen the Fight against Terrorist Financing*, 2017). So it can be seen that, on the European level as well, the connection to terror financing was used to draw attention to new anti-trafficking rules.

It has become clear from this analysis that the process of crafting new legislation on the trade in cultural objects in Germany has taken place mostly independently from the moral panic about antiquities trafficking that preceded it. However, the public presentations of this law, and later of the EU regulations on the import and trade in cultural objects, have made use of the narratives that became prominent during this moral panic, most strikingly with the alleged link between antiquities trafficking and terror funding.

In the following chapter, the results from the analysis of the legal texts are compared and contrasted with the public reactions of antiquities market actors, both to the change in legislation and the preceding media portrayal of antiquities trafficking.

6 CONTEXTUALISATION OF MARKET REACTIONS

Already during the process of crafting the 2016 *Kulturgutschutzgesetz*, as well as after its adoption, representatives of the antiquities market have reacted defensively to accusations of wrongdoing raised in the media against their profession, and criticised the new legislation as unfair and harmful to their businesses.

6.1 Introduction

This chapter deals with the reactions of the antiquities market to the bad press surrounding their trade as well as to the new legislation, including statements made through official websites and other media associated with or sponsored by the antiquities market. It also follows the formation of new organisations and associations, and their involvement in lawmaking processes to both negative media attention and changes in legislation. I analysed a selection of texts by market actors through deductive coding, using the key themes identified in the media analysis as codes. These were: A transition from words that frame antiquities as "art" to those that frame them as "cultural heritage", emotional language (covering in part *hostility*, which is an element of moral panic following Goode and Ben-Yehuda (2010)), references to terrorism and organised crime, disproportional figures, and criticism of the existing legal measures taken against antiquities trafficking. The market reactions are also analysed under the aspect of backlash to a moral panic, since, as I have shown in the media analysis, antiquities dealers were portrayed as a "secondary" folk devil, the supposed root cause of the perceived terrorist threat.

In addition to taking part in the lawmaking process (e.g., by appearing as expert witnesses in the cultural committee debate on the KGSG, as discussed in Chapter 5), representatives from the antiquities market have also reacted more directly and publicly to the sudden media attention to their trade, and the changes in legislation. In Chapter 4, I argued that the antiquities trade has emerged from the media portrayal as a folk devil next to the terror group IS. This sort of portrayal can elicit a reaction in the supposed folk devils who then try to reframe the discourse to serve their own goals, as has been noted by scholars before (Garland, 2008, p. 14; McRobbie & Thornton, 1995).

6.2 Sources

In the following sections, I describe the sources for the texts I analysed (see Section 3.1.3.), and why I chose them, in more detail than in Chapter 3, to set the scene for the following contextualisation of the media trends and themes in Section 6.3.

Prior studies have shown that the willingness of market actors to participate actively in studies researching the antiquities market tends to be low (Mackenzie, 2005; Mackenzie & Green, 2007). To cite a German example, the ILLICID project researching the market for Western Asian and Eastern Mediterranean antiquities in Germany between 2015 and 2019, notes that only few of the dealers and auction houses that they contacted for interview responded (Hilgert & Hemeier, 2020). In contrast to this noted reluctance to engage with researchers, antiquities dealers have developed lively public platforms through which they engage with each other, their customers, and the public. These include web forums and magazines (e.g. <https://culturalpropertynews.org/>, or <https://new.coinsweekly.com/>), newsletters (e.g. <https://www.cahn.ch/cahns-quarterly>), and statements via the websites of their professional organisations (e.g. <https://iadaa.org/>, <https://www.cinoa.org/>, <http://interessengemeinschaftdeutscherkunsthandel.de/>). It seems apparent that the antiquities market prefers to use its own platforms, where it controls the narrative, to weigh in on the debate. Some insight into the market's views on the discourse around conflict-related looting and trafficking can thus be found in official statements of art dealers' associations, for example, on their websites. Here they react to current affairs involving their trade, and as such, frame the discourse on antiquities trafficking from their point of view. The positionality of the voices will be arguably stronger than on platforms not controlled by the market itself. I deem this useful in the context of this study, because an unchallenged market perspective better shows the reaction of a group treated as folk devils to the moral panic they are targeted in.

One particular genre of market responses analysed here are public comments on the ILLICID report on the provenance and transparency of Western Asian and Eastern Mediterranean antiquities traded in Germany (Hilgert & Hemeier, 2020). Since these statements were published in a bid to frame the results of the report from a market perspective, they are analysed here.

Since the antiquities trade is by nature transnational (Mackenzie, 2020; Mackenzie et al., 2019), this analysis was less focused on sources from Germany specifically and includes English-language as well as German-language texts. That said, Germany is still the focus of the analysis, as, e.g., German dealers are members of the International Association of Dealers in Ancient Art (IADAA), and the legal changes in Germany are one of the main topics commented on by the analysed texts. In this spirit, market responses to public consultations on policy changes beyond the German

cultural property protection law, namely on EU level, which also directly affect the market in Germany, were also considered as a complementary source.

In the following subsections, I first provide detailed descriptions of the sources of the texts I analysed and the reasoning behind their inclusion. In section 6.3, I present the results of the analysis of these texts within the context of the key themes identified in the media analysis of Chapter 4, and their relation to moral panic. This selection of texts is not exhaustive. However, they show an overview of sentiments made publicly available by associations of antiquities dealers and collectors, as well as market-friendly publications. They are easily accessible online, and therefore arguably part of the public discourse on antiquities trafficking. Most of them were published after the peak of the moral panic identified in the media reporting between 2014 and 2016. As will be discussed in detail further below, I see the general framing of these texts as a direct reaction to this moral panic.

6.2.1 Texts analysed from the International Association of Dealers in Ancient Art (IADAA)

One example of a trade association reacting to the media discourse on antiquities trafficking are statements put online by the International Association of Dealers in Ancient Art on their website (www.iadaa.org). While this association has an international outlook, most of their members are based in the European Union, and many of them in German-speaking countries, and is therefore particularly relevant in the context of the German-language media and the German law amendment. The following texts were accessed on 17.04.2023 and analysed:

- The "Chairman's Address" ("Grusswort des Vorsitzenden") on the landing page of the website of the International Association of Dealers In Ancient Art (IADAA), in German, (Geerling, 2023).
- The text under the section "Kulturgüterschutz" ("Cultural Property Issues" in the English version of the website) (*Kulturgüterschutz – International Association of Dealers in Ancient Art*, 2023).
- The text under that section's subsection, titled "Leitbild der IADAA" ("Statement" in the English version) (*Leitbild Der IADAA – International Association of Dealers in Ancient Art*, 2023).
- The English-language report "IADAA FACTS AND FIGURES" already available in PDF under the section "Zahlen und Fakten" ("Facts and Figures") of the website (IADAA, 2023).
- The IADAA's interpretation of the preliminary report of the ILLICID project (IADAA, 2019).

According to the chairman's welcome address, which is published on the landing page of their website (accessed 17.04.2023), the association "represents the top international dealers in Classical, Egyptian and Near Eastern ancient art" (Geerling, 2023). This field of interest makes the association a key stakeholder group specifically in the discussion about looted Syrian and Iraqi antiquities. The website, although hosted from a server in the Netherlands, is available in English and German. The welcome page of the website, with a statement of the chairman at the time of analysis, Vincent Geerling, already makes some references to cultural heritage destruction, specifically in Iraq and Syria (Geerling, 2023). Additionally, the topic of cultural property protection (*Kulturgüterschutz*) has its own subsection, where the association has published some statements, as well as links, about their view on the implication of antiquities dealers in conflict-related looting and destruction (*Kulturgüterschutz – International Association of Dealers in Ancient Art*, 2023). The chairman's address, as well as the introductory text under the subsection of cultural property protection, and the statement under the subheader "Leitbild der IADAA" (roughly: "guiding principle of the IADAA", although the English version of the website simply says "Statement") have been selected because they represent the easiest way for any interested member of the public to access the organisation's view on issues of cultural heritage protection.

The subsection "Kulturgüterschutz/Cultural Property Issues" [translation from the IADAA website] also features selected quotes from a number of academic works collected under the subheader "Stimmen aus der Wissenschaft/Some scholar's opinions". While these are certainly relevant to the academic discussion around antiquities trafficking, they have been left out of this analysis because they are not part of the public discourse about conflict-related looting in Western Asia post-2003, but rather debate the concept of "illicit antiquities" in a more general way.

A more direct reaction to the media and public discourse on antiquities trafficking is the subsection "Fakten und Zahlen/Facts and Figures", which features a 25-page report (only in English) on the debate under the headline "Fighting Bogus Information About The Art Market", published in July 2023 (IADAA, 2023). This report is especially relevant for the study of the market perspective on the moral panic because it evaluates the exaggeration, disproportional figures and unsubstantiated rumours that have come up in the media analysis chapter of this thesis, but with a market agenda. The report is therefore arguably a reaction to moral panic from a market perspective. The report summarises the debate and changes in legislation and law enforcement practice over the years, with a strong emphasis on the assertions that antiquities trafficking has never been proven to be a significant revenue source for terror groups such as IS, and that no direct link from IS to any antiquity sold on the European market could be established so far. Another crucial aspect of the document is its criticism of legal measures taken in several countries during the past years as being

detrimental to "legitimate" businesses in the art market. The analysis of this text showed that many of the key themes identified in the media reporting are reflected in this report, even if only as a reaction, as will be laid out in more detail below. IADAA's reaction to the preliminary ILLICID report (Hilgert, 2019) has also been coded and analysed.

6.2.2 Texts analysed from the Interessengemeinschaft Deutscher Kunsthandel

The Interessengemeinschaft Deutscher Kunsthandel is an umbrella organisation of six associations representing the interests of German antiquities dealers and auction houses which was formed in reaction to the 2016 law amendment (<http://interessengemeinschaftdeutscherkunsthandel.de/>). It is notable here that two of the associations in the group (Bundesverband Deutscher Galerien und Kunsthändler e.V. and Bundesverband Deutscher Kunstversteigerer, e.V.) were also represented at the parliamentary debate preceding the adoption of the law in its final form. Two more of them are associations of coin dealers (Verband der Deutschen Münzenhändler, e.V., and Berufsverband des Deutschen Münzenfachhandels, e.V.), and while they were not specifically represented at this meeting, the interests of coin dealers and collectors were spoken for by Kristian Nicol Worbs, president of the German Numismatic Society (Deutsche Numismatische Gesellschaft), and even led to the exception of ancient coins from the legal classification as antiquities for the purposes of the *Kulturgutschutzgesetz*. In spite of their active inclusion in the lawmaking process, as many as 20 associations of art and antiquities collectors and dealers founded an "active alliance" ("Aktionsbündnis Kuturgutschutz", <https://www.kulturgutschutz.info/>) against the new legislation in 2016, calling for another amendment that would, among other demands, lower due diligence rules for the import of cultural objects to Germany (*Unsere Forderungen*, 2016).

Six of these associations later formed the *Interessengemeinschaft Deutscher Kunsthandel* as a successor in 2019, still with reference to "the German cultural property protection law and relevant EU regulations, which increasingly strain the market in cultural property" ("das deutsche Kulturgutschutzgesetz und einschlägige Richtlinien der EU, die den Kulturgutmarkt zunehmend belasten", (Kunsthandel, 2019b)). This group has since then put out infrequent press statements about their view of the legal situation of art dealers in Germany on their website, most of them in 2019, and then two in 2022 regarding a conference organised by the association. The latter was also held in 2019, but due to the COVID-19 pandemic, the publication of the talks was delayed until 2022.

Four statements published between January and July 2019, from the formation of the alliance until its commentary on the preliminary ILLICID report, have been coded then analysed for this study.

These four statements are:

- The press statement about the formation of the association (Kunsthandel, 2019b).
- A press statement on an evaluation of the KGSG (Kunsthandel, 2019a).
- A press statement on the fight against antiquities trafficking in general (Kunsthandel, 2019c).
- A commentary on the preliminary report of the ILLICID project (Kunsthandel, 2019d).

6.2.3 Market comments on the ILLICID report

Comments made by market actors about the (preliminary) report of the ILLICID project are a sub-category of the two sources above, but have also come up in other publications (Fitz Gibbon, 2019). Thus, the source merits a separate discussion here. While many of the comments by market actors directly target the media portrayal of their trade or newly introduced laws and regulations, these comments react to a scientific study aimed at the interdisciplinary ILLICID project funded by the German government, which investigated the so-called "dark field" (*Dunkelfeld*) of illicit antiquities trading in Germany. The project drew some interest and criticism by antiquities market actors already upon its presentation to the press in 2015 (Hilgert, 2015). It should be noted here that in this text, Hilgert stated as one motivation for the project that "profits from illegal trade with cultural goods are a mainstay of organised crime with links to drugs and arms trade, money laundering, as well as the funding of terrorism" ("Gewinne aus illegalem Handel mit Kulturgütern sind ein wichtiges Standbein der organisierten Kriminalität. Dabei bestehen Verbindungen zum Rauschgift und Waffenhandel, zur Geldwäsche sowie zur Terrorismusfinanzierung." (Hilgert, 2015)). It is this strong claim, which is sharply criticised by the market commentary on the publication of the preliminary report in 2019. For example, the authors of the bilingual web forum "Coins Weekly/Münzenwoche" call the apparent anticipation of results in the proposal "embarrassing and unscientific" ("peinlich und unwissenschaftlich" (Coins Weekly, 2019)).

When a 9-page preliminary report on the ILLICID project was published in 2019 (Hilgert, 2019), it was quickly commented on by groups representing the interests of the antiquities market. Apart from the IADAA commentary on the subject, which was reprinted by "Coins Weekly" or "Münzenwoche" (<https://new.coinsweekly.com/>) and quoted in an article on the web magazine "Cultural Property News" (Fitz Gibbon, 2019), this also includes the webpage of the "Interessengemeinschaft Deutscher Kunsthandel". These comments frame the results as an

exoneration of the trade (Kunsthandel, 2019d). They dismiss the project as a failure and a waste of taxpayer money for not showing a clear link to terrorism, organised crime, or money laundering. The article on Cultural Property News even suggests that the report may have been "buried for failing to show illegal trade" (Fitz Gibbon, 2019). The allegation here being grounded in the observation that the preliminary report was not published with greater fanfare. More independent journalism, however, notes that the final report was, at the time, yet to come (Schmälzle, 2019). The texts coded and analysed in this thesis for the reactions to the ILLICID report are (apart from those published by IADAA and the Interessengemeinschaft Deutscher Kunsthandel, already listed above in the respective sections):

- An article in the web magazine Cultural Property News (Fitz Gibbon, 2019).
- The reprint of the IADAA analysis, with some comment, by the website Coins Weekly (Coins Weekly, 2019).

6.2.4 Complementary texts related to public consultations on EU regulations

As associations, businesses, and private citizens, market actors can also respond to public consultations on new laws and regulations, which they have done several times for policy changes which concerned the antiquities market. Two notable consultations from recent years are those on the proposed rules of imports of Cultural Goods into the EU in 2021 (*European Commission - Have Your Say*, 2021), and on the EU Action Plan against Trafficking in Cultural Goods in 2022 (*European Commission - Have Your Say*, 2022). Both drafts received feedback from antiquities market actors, which is available on the public website "Have Your Say" (https://ec.europa.eu/info/law/better-regulation/have-your-say_en). The reactions to these consultations have not been analysed in detail for this study, but serve as a complementary source to give an overview and a comparison with the market reaction to legislation changes on a European level, happening a few years after the peak of the moral panic.

The draft rules on the import of cultural goods were published in March 2021, and drew significant criticism from the antiquities market: almost all of the 58 feedback letters came from market associations or private dealers and collectors, stating that the proposed rules would be far too complicated to enforce or to follow (*European Commission - Have Your Say*, 2021). The modified regulation was implemented in June 2021.

The "Have Your Say" consultation on the EU Action Plan against Trafficking in Cultural Goods, in 2022 received significantly less feedback from the market side. Only seven of the 45 respondents who sent in comprehensive feedback came from the art market: the Brussels-based umbrella

association CINOA (Confédération Internationale des Négociants en Oeuvres d'Art, or International Confederation of Art and Antique Dealers' Associations, [translation on website]), as well as IADAA, the Czech Association of Antique Dealers, the European Federation of Auctioneers, the auction house Christie's in London, and two private dealers based in Sweden and the United States. CINOA provided a position paper uploaded on the Have Your Say website which they also published on their own website and which was also uploaded with the feedback by IADAA and Christie's. This position paper calls for a more active collaboration with market actors by law enforcement, which is also included as one of the aims stated in the action plan itself. All six other respondent parties stated full endorsements of CINOA's position paper (*European Commission - Have Your Say*, 2022). The concerted effort of the different antiquities dealers' associations, "speaking with one voice", is also noteworthy here, as community building has been identified as one possible reaction by a group designated as folk devils in a moral panic (Waldron, 2005).

6.3 Key themes in the market reaction

Within antiquities market spaces, the key topics in the discussion of antiquities looting and trafficking differ somewhat from those in the media or in the lawmaking process. Some of this can be explained by the difference in medium. Many statements made by market actors are clearly marked and intended as a counterpoint to the narrative widely dispersed in the media. Nevertheless, some of the markers of moral panic, as well as some of the key themes identified in the media analysis, can also be seen in the texts that have been analysed here. It is not uncommon in a moral panic that real or alleged media exaggeration and distortion are criticised strongly by those affected (Cohen, 2002). As such, it is not surprising that the most prominent themes in the media are also those most strongly contested by voices from the market, namely, the allegation of terror financing and the disproportional market figures. Some other common themes found both in the media and the lawmaking discussion are also reflected in market statements on the issue, as will be discussed in the following sections.

6.3.1 From art to heritage: Antiquities as art and "shared heritage"

One point in which the language of the market seems to differ strongly from the rhetoric of the wider discourse is an insistence on addressing antiquities as "ancient art": For example, the IADAA describes itself as "representing the internationally leading dealers in classical, Egyptian, and Near Eastern ancient art" ("Gegründet im Jahre 1993, vertritt unsere Organisation die international führenden Händler von klassischer, ägyptischer und vorderasiatischer Kunst der Antike" (Geerling,

2023)). There are even several statements that specifically deal with the aesthetic qualities of ancient artefacts as a value in itself, for example, with describing antiquities dealers as "dealer and agent of ancient beauty" ("Händler und Vermittler von antiker Schönheit" (*Kulturgüterschutz – International Association of Dealers in Ancient Art*, 2023)). The conflation of art and antiquities equates objects made for consumption such as paintings made by an artist to sell, with objects not originally produced for the modern market, but which may have been looted, destroying their archaeological context. However, this equation is not necessarily intentional, as many consumers (market actors as well as members of the public) genuinely experience antiquities as art objects. Furthermore, the insistence on describing ancient artefacts as art objects may also be connected to the antiquities market's self-conception as part of the wider art market. This self-conception can also be seen in the formation of groups such as the *Interessengemeinschaft Deutscher Kunsthandel* (literally translated "interest group German art market"), which criticised the German cultural property protection law KGSG both on the grounds of its effects on sellers of modern art, and dealers in antiquities and coins (Kunsthandel, 2019b).

On the IADAA website, there are also several references to ancient artefacts as pieces of a "common" or "shared" heritage ("die Überreste unseres gemeinsamen kulturellen Erbes" (*Leitbild Der IADAA – International Association of Dealers in Ancient Art*, 2023)). This phrase is here used to frame the trade in archaeological objects as a form of protection, an argument made before in the antiquities and other illicit trades (Mackenzie & Yates, 2016a). It can also be seen as a means to defend the keeping of cultural heritage in a richer country by declaring it "world heritage" as opposed to the cultural property of its country of origin, which echoes arguments also made by Merryman (1986, 2005), and other scholars defending a self-described "cosmopolitan/internationalist" stance (Kersel, 2012, p. 78).

Overall, there is a striking difference between the lexical choices made in the media after 2014, and the public statements from the antiquities market of the same time, in that the media analysis in Chapter 4 showed a clear tendency to choose words from the realm of "cultural heritage/cultural property" with the unfolding of the moral panic, while dealers still tended to frame antiquities as art objects even in 2019 and beyond. This shows a resistance to the rhetoric of the moral panic used in the media, but it also shows the self-identification of antiquities dealers as part of the art market.

6.3.2 Emotional Language

The analysis shows a clear tendency towards the use of emotional language, which appears in three basic patterns. Firstly, the texts analysed display a fear of being forced out of business and a fear of

criminalisation of market actors. Secondly, they display *hostility* against the media, lawmakers, and activists or archaeologists. Thirdly they display an appeal to sympathy for honest, as opposed to dishonest, market actors.

Fears of expropriation and criminalisation

Some of the statements convey a fear of expropriation and being forced out of business by the new legislation, either through an inability to compete with traders from other countries, or through an effective ban on business practices. For example, a Cultural Property News article warns that "because the requirement of the law will be impossible to satisfy, it will act as a de facto ban on the import of antiquities" (Fitz Gibbon, 2019).

The IADAA's "Facts and Figures" document notes that new legislations may have "far-reaching implications for international trade, privacy rights and private property.", which implies a fear of expropriation of dealers and collectors (IADAA, 2023).

The fear of criminalisation is also quite obvious in some of the lexical choices made. One example is the commentary of the "Interessengemeinschaft Deutscher Kunsthandel" on the ILLICID report, which called the latter a "verdict of acquittal for the art market" ("Freispruch für den Kunsthandel"), thereby clearly implying some kind of collective prosecution preceding the report (Kunsthandel, 2019d).

Hostility

Perhaps not entirely surprising in an analysis of the backlash toward a moral panic, coming from one group marked as responsible for the problem, is a tone of *hostility* towards those who make—or are thought to make—the accusations against the group. Within the analysed corpus of texts from antiquities market platforms, the targets of this *hostility* are sometimes the media, but more often archaeologists and antiquities crime researchers, as well as lawmakers. Rather consistently, there is a tone of anger at the perceived misrepresentation of the antiquities trade in the public discourse. On the IADAA website's "Kulturgüterschutz" subsection, for example, the media coverage is called "biased, undifferentiated and poorly considered" ("einseitig, undifferenziert und wenig reflektiert") (*Kulturgüterschutz – International Association of Dealers in Ancient Art*, 2023).

IADAA's Facts and Figures document calls allegations made against the trade "bogus" and "nonsense", pointing out specifically that "it is the authorities themselves – from law enforcement to law makers – who often propagate this bogus data" (IADAA, 2023). As noted above, the investigation of the antiquities market is framed as excessive and a waste of government resources

in this document as well. The allegation of wasting taxpayer money on spurious accusations can also be seen in some of the comments on the ILLICID report, which put a marked emphasis on the 1.2 million Euro cost of the project (Coins Weekly, 2019; Kunsthandel, 2019d). Another example of this fear is again the IADAA's "Facts and Figures" document, which summarises: "Over the past 20 years and more, governments, law enforcement, NGOs and others have spent vast sums of money and countless hours investigating the art market. Their ultimate objective? To prove that it is responsible for terrorism financing. The result? Nothing." (IADAA, 2023). This lack of evidence is put forth here as implied proof of innocence, while also alleging a waste of resources by the authorities. It is not surprising that market actors do not want to be seen as terror financiers and thus put an emphasis on the assertion that this allegation has never been proven in any substantial way. Especially in these cases, the hostility often comes in the form of mockery, as can be seen from the *Interessengemeinschaft Deutscher Kunsthandel's* press statement on the official evaluation report of the 2016 *Kulturgutschutzgesetz*, using a turn of phrase that denotes a useless, and potentially wasteful, endeavour as its introductory phrase: "Außer Spesen nichts gewesen" (Kunsthandel, 2019a).

Another example of hostile or accusatory language used in the context of the ILLICID report is the subtitle of the Cultural Property News article, which reads "Are Anti-Art Trade Activists Determined to Perpetuate a Lie?" (Fitz Gibbon, 2019). These lexical choices can be seen as a direct mirror of some of the phrasings used in the media, which also used quite aggressive language to paint antiquities dealers as criminals. In this sense, a reaction to moral panic as part of the moral panic can be identified here (Garland, 2008, p. 14).

The dichotomy between the legitimate and illegitimate trade

Another point, made often and strongly, as in the discussion around the German law amendment from 2016, is the clear differentiation made between the legitimate and illegitimate antiquities dealers. Under the subsection "Kulturgüterschutz/Cultural Heritage Issues", the association affirms that the members undergo a voluntary obligation not to buy looted material (*Kulturgüterschutz – International Association of Dealers in Ancient Art*, 2023). The IADAA "Facts and Figures" document also warns that the investigation of potential links between unprovenanced antiquities and terrorism leads to "the persecution of legitimate business and private individuals in breach of fundamental human rights, including property rights and privacy rights" (IADAA, 2023). A variation of the phrase "legal" or "legitimate business" occurs more than once in most analysed texts. In some cases, for example the *Interessengemeinschaft Deutscher Kunsthandel's* press

statement on the evaluation of the KGSG, there is also a specific point made about cases of suspected wrongdoing not being proven (Kunsthandel, 2019a). The insistence on the business of transnational antiquities trading as legal and legitimate seems to go hand in hand with a dismissal of stricter regulations as excessive. The general tone reflects the rhetoric of the market already noted by Mackenzie (2011a), which emphasises the importance of individual private property rights and the preservation of isolated artefacts over harm done to culture globally (Mackenzie, 2011a, p. 14). The absence of proof for wrongdoing is generally framed as proof of legitimacy. The final report of the ILLICID project notes that previously undocumented artefacts looted from archaeological sites do not appear on any lists of stolen goods, which then by implication means that those artefacts can never be identified as definitely legal even without proof of illegality (Hilgert & Hemeier, 2020, p. 7). This clarification seems especially necessary in light of the preceding IADAA commentary on the preliminary report, saying "What it does not say is whether any of the material it has studied is categorically illicit or even highly likely to be illicit. It also does not explain how a study of the legitimate market can be informative about criminal activity." [emphasis mine]. This statement makes clear how important it is for the antiquities market to maintain a sharp contrast between "honest" and "criminal" antiquities dealers.

As has been shown in Chapter 4, the media portrayed the antiquities trade more and more as an inscrutable, "grey" market and sometimes as a criminal enterprise altogether over the researched time period. In terms of moral panic, antiquities dealers emerged as a folk devil, responsible for terror financing and antiquities looting. While the media make no clear distinction between honest and dishonest dealers, the antiquities dealers themselves put a strong emphasis on this distinction. It is a clear attempt to counter the portrayal as folk devils.

6.3.3 Terror and organised crime

With the emphasis on terror financing emerging from the media discourse, it is not surprising that the reactions from the market also concentrate on confronting these allegations, sometimes rather aggressively, as shown above (under "hostility"). Terms translatable to terror financing occur several times in most of the analysed texts, often in connection to the ILLICID project. The ILLICID project's failure to find hard evidence for terror funding through the antiquities market is then sometimes used as grounds to dismiss the project as a whole by market commentators. For example, the IADAA's commentary on the ILLICID report points out that no direct links between terrorism and the open antiquities trade could be confirmed, despite this being postulated in the project presentation from 2015 (Hilgert, 2015; IADAA, 2019), while the "Facts and Figures"

document dedicates an entire section to the topic, and postulates that "The level of risk of looted cultural property with links to terrorism financing is almost nonexistent in comparison with drugs, weapons & ammunitions, tobacco, alcohol and counterfeit goods." (IADAA, 2023). The *Interessengemeinschaft Deutscher Kunsthandel* brings the lack of reliable data in this regard together with a call to relax, or literally "rethink", restrictions on the antiquities market: "Now at the latest, as it is clear that the illegal trade in cultural property is being overestimated, and terror financing does not happen through cultural goods, is the time to rethink." ("Spätestens jetzt, da deutlich ist, dass der illegale Kulturguthandel überschätzt wird und Terrorfinanzierung nicht über Kulturgüter erfolgt, ist es Zeit umzudenken." (Kunsthandel, 2019a) [emphasis added]).

A message that becomes clear from the IADAA website text under the subsection "Kulturgüterschutz" is that the association sees the responsibility to stop the looting and trafficking of cultural objects as resting with the countries of origin, noting that "IADAA has been highly active in campaigning to protect the legitimate antiquities trade while investigating the best means of putting an end to the illegal activities of looters, smugglers and forgers." and requesting countries of origin to "take proper care of their archaeological sites" (*Kulturgüterschutz – International Association of Dealers in Ancient Art*, 2023). It seems to be implied by the dealers that, in some cases, archaeological artefacts are better cared for outside of their country of origin, due to the dangers of war, corruption, economic crisis or religious intolerance: "Warfare, economic development and religious and cultural intolerance are threatening our shared inheritance" (*Kulturgüterschutz – International Association of Dealers in Ancient Art*, 2023).

The supposed connection between the international, and specifically the German antiquities market and the terror group IS was a prominent theme in the media reporting on antiquities looting and trafficking, especially between 2014 and early 2015, at the height of the moral panic. The strong focus on denying these accusations in the analysed corpus of market statements now mirrors this theme almost exactly. It is arguably direct backlash against the moral panic.

6.3.4 Disproportional Figures

Parallel to the backlash on allegations of terror financing, the market also responded strongly to the disproportional portrayal of the market value of illicit antiquities. The claim that the international illicit antiquities market is worth billions of dollars, and/or is the third-largest illicit market worldwide, has been repeated in the media over and over, but has no foundation in the results of any known research or reputable analysis (European Commission et al., 2019; Yates & Brodie, 2023). Much like the tenuous, but prominent allegations of terror financing, it was a recurring theme of the

news articles pertaining to illicit antiquities from at least 2005 onwards, with numbers getting more exaggerated during the height of the moral panic between 2014 and 2016. Mirroring the media discourse, this *disproportion* also appears to be a prominent theme in the market backlash. The overall theme of the analysed texts on this topic is to deemphasise the financial value of the illicit antiquities trade.

The various market responses to the ILLICID preliminary report analysed for this study point out that the data analysed in the ILLICID project did not find many Syrian and Iraqi objects sold at high prices (IADAA, 2019). The low overall market volume also published in the ILLICID report is emphasised as well by the market commentators. Since the billion-dollar figure for the illicit antiquities trade is seen as obviously and demonstrably false by the analysed market voices, they react by using it to discredit the media, NGOs, academics and lawmakers who drew on this figure. As with the supposed connection between terror funding and the antiquities trade, the overblown market figures for illicit antiquities that were a prominent theme in the media, are refuted equally prominently in the analysed market texts. This is also a reaction, and backlash, to the moral panic.

6.3.5 Criticism of legal measures

Much like the perceived lack of proper or properly enforced laws on illicit trade in cultural goods was an important theme in the media portrayal of antiquities trafficking, criticism of the legal measures taken is very prominent in the market reaction to it. The IADAA analysis of the ILLICID report calls the German cultural property protection law from 2016 "draconian" ("drakonisch") and judges that it "stifles the German art market". Similarly, the report criticises other, at the time still planned, EU legislations for being "likely to inflict unnecessary harm on Europe's legitimate art market" (IADAA, 2019). The Cultural Property News article on the same topic even alleges that Germany's 2016 *Kulturgutschutzgesetz* already has done "enormous damage to German collectors, museums, and the art trade" (Fitz Gibbon, 2019). Generally, there is a recurring theme of laws and regulations placing an excessive burden on dealers and collectors. The *Interessengemeinschaft Deutscher Kunsthandel* calls the law excessive ("schießt weit über sein Ziel hinaus"), and criticises the cost connected with due diligence regulations (Kunsthandel, 2019a). The article in Cultural Property News brings this together with the discourse on terror financing and the disproportional figures on the illicit antiquities market, writing "restrictive German legislation has already been passed based upon unsubstantiated claims that a billion euro antiquities market was financing terrorism" (Fitz Gibbon, 2019). Note that this claim is false, seeing that the amendment of the cultural property legislation in Germany had been planned since 2013.

Overall, the market commentary frames the amendment of Germany's cultural property legislation in 2016 and later EU regulations as reactions to the criticism in the media that came before their adoption. Thus, without using the term "moral panic" itself in any of the documents analysed for this study, the antiquities market actors make it clear that they see the changes in legislation as part of the ongoing moral panic. This is despite the fact that the debate around the legislation did not reflect the prominence of the themes of terror financing and the billion-dollar illicit market from media portrayal, nor was the amendment of the German law a reaction to the media moral panic. The analysed voices from the market, however, connect the legal changes to the previous media discourse and thereby portray them as an overreaction of authorities to a moral panic, to the detriment of their trade. This framing again fits to the backlash of a folk devil against a moral panic.

6.4 Summary of the market reaction

In reaction to the arguably deteriorating image of antiquities trading, antiquities market actors have defended themselves mainly on their own channels, such as the IADAA website or the press statements published on the website of the *Interessengemeinschaft Deutscher Kunsthandel*, as well as special interest forums such as Coins Weekly and market-sponsored web magazines like Cultural Property News. Press statements by antiquities dealers, geared towards an already market-friendly audience, can have an effect of a "saving grace" when faced with cases of antiquities of unclear provenance. This was clearly one of the attempted outcomes here, as an effort to exonerate the trade from allegations made in the media more generally.

Overall, the language used by the market differs somewhat from that used in the media. Unlike the latter, who in the course of reports on antiquities looting and trafficking have all but stopped referring to cultural heritage as art, market actors very much still did. In other ways, the market texts can be seen as a mirror image of the sometimes hostile, sometimes even sensationalist language used in parts of the media. Where there were allegations of terror financing and overblown market figures in the media, so there were just as strongly worded rebuttals of these allegations from the market.

Perhaps most notable from the analysis of the coded market texts is an emotional rebuttal of the media narrative, with a marked *hostility* especially against archaeologists, antiquities crime researchers, as well as lawmakers. In this context, the largely unsubstantiated claim of terror financing is used as a way of portraying the market as a victim of unfair prosecution. This framing is often used in conjunction with the above-mentioned criticism of new laws and regulations, which are portrayed as putting excessive strains on market actors, but also, as creating an inordinate

amount of bureaucracy and wasting taxpayer money. Stricter import and due diligence regulations are framed as an attempt to prosecute legitimate businesses by biased lawmakers and speak for a general theme of the antiquities market's fear of criminalisation and expropriation.

An article in *Cultural Property News*, on the preliminary report of the ILLICID project, even goes so far as to suggest that the project's results were hidden from the public eye for failing to show what is framed as the politically desired outcomes:

"The much-heralded report from the ILLICID project, more than a year overdue and only nine pages long, has been published and then quietly shelved in a German library. It appears that the ILLICID project researchers did not find the data they set out to find. There was no billion-dollar online auction trade in illicit artifacts, and in the 356,500 items studied, the project found no evidence of ties to terrorism or organized crime." (Fitz Gibbon, 2019).

The author thus implies that the only reason for the investigation of illicit trafficking by the ILLICID project was to prove these allegations. While this was never the main aim of the project, as is arguably shown in the ILLICID end report, which was published in 2020 (Hilgert & Hemeier, 2020), this framing is prominent in the texts analysed for this chapter.

Some backlash may be expected from a supposed "folk devil" in a moral panic. It has been noted already by McRobbie and Thornton (1995) that in a modern media landscape, folk devils are not merely the subject of moral panic, but also tend to react to it in various ways, often using their own media channels. Garland (2008, p. 14) notes that completely uncontested moral panics have become increasingly uncommon in the modern media landscape. This is even more true in our times where social media and other online outlets are widely available, and even terrorists can use a climate of moral panic for their own goals (Walsh, 2017). In this case, the market reaction has been most prominently one of direct denial of accusations made against the trade, and attempts to discredit the accusers. It is also striking that the developments in the legal sphere are framed consistently as a result from the media moral panic, albeit without using the term.

Another notable development is the formation of new alliances within the market, such as the *Interessengemeinschaft Deutscher Kunsthandel*, or the adoption of the CINOA statement on the EU's consultation for the EU Action Plan Against Trafficking of Cultural Goods (*European Commission - Have Your Say*, 2022) by several other associations and private dealers. Community building in the face of a moral panic is a phenomenon that has been described before, for example, with players of roleplaying games targeted by the so-called "Satanic Panic" (Waldron, 2005).

Generally, the reaction by market actors in the texts analysed for this study is consistent with the reaction of a group cast as folk devils in a moral panic. It is a part of the ongoing discourse about the topic that causes concern, in his case the trafficking of illicit antiquities.

7 DISCUSSION

The preceding chapters followed the shifting portrayal of antiquities looting and trafficking in German newspapers between 2001 and 2021, legal changes in the same time period, and the reaction by antiquities market actors to both. I have shown that the trade in looted cultural objects from conflict zones in Western Asia became a semi-regular news topic following the American-led invasion of Iraq in 2003, but only became the object of a moral panic later, with the rise of the terror group IS in Northern Iraq and Syria between 2014 and 2015. During this time, media reporting on the topic of antiquities trafficking reached a marked peak and linked the looting and trafficking of antiquities from Syria almost exclusively with IS.

In this chapter, I explain why this reporting and the ensuing legal and market discourse can be considered a moral panic, but also, what the nature of this moral panic was, and what can be learned from it for the communication of heritage protection and antiquities trafficking. In this context, I also weigh the question whether a moral panic can even be avoided, when circumstances align that favour this reaction. Finally, I discuss which consequences resulted from this moral panic, both for the German antiquities market, and society more generally.

7.1 A Moral Panic about cultural heritage?

Introduced in Chapter 1 of this thesis, the first research question I set out to address was:

Can the discourse on antiquities trafficking in Germany be considered a moral panic about cultural heritage?

This is a twofold question. First, it aims to address whether there was a moral panic about antiquities trafficking, and then secondly, to address what the objective of this moral panic was. That is to say, this question was designed to consider whether there was a concern for cultural heritage at the heart of the moral panic, or whether it was centered around something else. As I argued in the previous chapters, the way the discourse on antiquities trafficking developed between 2014 and 2016 in Germany can be considered a moral panic. The sudden peak in public interest in the illicit antiquities market, starting in the second half of 2014, with both experts and politicians expressing concern about the issue, the exaggeration of both links to IS by the antiquities trade and the overall market value of illicit antiquities, the emotionality of the discourse and the subsequent disappearance of the topic from the newspapers after the amendment of the cultural property law in 2016, are all consistent with the social concept of a moral panic following Stanley Cohen (2002). What exactly the nature of this moral panic was, and whether it was truly focused on cultural

heritage, as the research question implies, warrants a more nuanced discussion, which I will offer after detailing, in the next section, what led me to the conclusion that a moral panic did take place.

7.1.1 From media topic to moral panic

As discussed in Chapter 2, a moral panic, as defined by Cohen (2002), unfolds as follows. First, a group of people is identified as an immediate threat to society, often after an initial incident that made the news. Then, news media step in and amplify the problem. Influential figures, which Cohen calls "right-thinking people", rally behind the cause (Cohen, 2002, p. 1). Calls for action to the authorities ensue. These calls are then at least seemingly answered, social changes are enacted, and the moral panic dissipates (Cohen, 2002).

Elaborating on this concept, American sociologists Goode and Ben-Yehuda (2010) identified five elements that mark a moral panic: *Concern* about a societal issue, a certain *consensus* among the commentary, *disproportion* in the description of the problem, *hostility* towards the group identified as responsible, and lastly, *volatility*, meaning again that the moral panic dissipates soon after reaching its peak (Goode & Ben-Yehuda, 2010, 2011). While the themes of both concepts are similar, Cohen's model is more focused on the development of a moral panic, while Goode and Ben-Yehuda identify the necessary qualities for a moral panic. This is why these two approaches to moral panic analysis have been called the "processual" and "attributional" model, respectively, by Critcher (2008, 2017). In the present study, I used both models to analyse the reporting, and subsequent public discourse on Western Asian antiquities trafficking in Germany in order to find out if a moral panic had occurred, and what its main features and consequences were. Combining these two concepts in my research approach allowed me to follow how this moral panic unfolded over time and to pinpoint the moment when, I argue, the media discourse on antiquities trafficking spun out of control.

From my media analysis in Chapter 4, I have concluded that this happened in the second half of 2014, when the number of articles mentioning antiquities trafficking ("Antikenschmuggel, Antikenhehlerei") and looting ("Raubgrabungen") suddenly spiked. The framing analysis of these articles showed that from that time onward, the topic of antiquities trafficking in Syria and Iraq were linked in the reporting with the terror group IS. Articles on this supposed connection and the antiquities market's alleged involvement in terror financing were frequent until early 2015. Even before this time period, the reporting on antiquities trafficking had carried some of the elements of moral panic defined by Goode and Ben-Yehuda (2010).

A sense of *concern* about Western Asian cultural heritage, for example, can be seen in the German-language newspaper landscape from about 2003 onwards, beginning after the looting of the Iraq Museum following the fall of Baghdad, but attracting somewhat more interest from 2005 onwards (see Section 4.1.3). *Concern* alone, however, does not constitute a moral panic. Antiquities looting and trafficking was also reported on in connection with the antiquities market in Germany and new forms of largely unregulated international trade on the internet, sometimes leading to lexical choices that suggest *hostility* against German market actors accused of trading looted antiquities.

Disproportion, for example in the form of calling the antiquities trade the third-largest illicit market, also came up occasionally (see Section 4.1.3). In the following years, the cultural fallout of the 2003–2007 Iraq war and a few relevant restitution cases in Germany were reported on infrequently, but often enough to emerge as a topic of some public interest for the readers of the arts and culture sections (see Section 4.1.4). With the escalation of the Syrian civil war in 2012, newspaper articles again expressed growing *concern* for the cultural heritage of the region, again occasionally in combination with *hostility* against dealers and *disproportion*, and starting to show a certain *consensus* across the newspapers (see Section 4.1.5). Despite the presence of these elements of moral panic, I argue that they were not yet prevalent enough, and the number of articles dedicated to the topic of antiquities trafficking was not yet high enough, to warrant the label of moral panic at this point in time.

The turning point came with the rise, and rapid territorial gains in Syria and Northern Iraq, by the terrorist group Islamic State (IS) during the Syrian civil war in 2014. In reaction to this development, the reporting on antiquities trafficking in the German newspapers changed dramatically. The concern about the looting and trafficking of antiquities from Syria and Iraq became suddenly focused on IS as a main perpetrator (see Section 4.1.6). The number of articles dedicated to the topic of antiquities trafficking spiked markedly between the second half of 2014 and especially in February 2015, after a period of relative silence on the topic in 2013 (one article found on Nexis) and early 2014 (see Fig. 7.1).

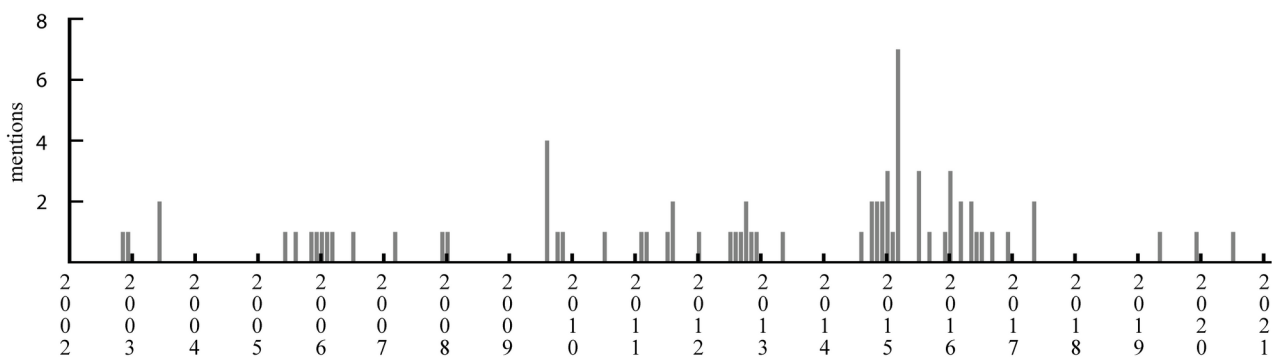


Fig. 7.1: This figure shows the total number of German-language articles mentioning at least one of the three search terms defined in Chapter 3 ("Raubgrabung" – "looting", or "Antikenschmuggel", "Antikenhehlerei" – "antiquities trafficking") between 2002 and 2021 found on Nexis for this study. The y axis shows the number of mentions, while the x axis marks the months. Note the peak in late 2014 and early 2015.

With the shifted focus on the terror group IS, the general tone in reporting also changed. The *hostility* against participants in the German antiquities trade became more prominent, since the terrorists were rumoured to finance their war efforts to a substantial part by selling looted antiquities to buyers in North America and Europe, including Germany. Also, the media claimed an ever higher total value for the illicit antiquities market – up to \$36 billion in some articles –, which made the element of *disproportion* more pronounced than before. Finally, the reporting in this time period shows a remarkable *consensus* between journalists writing for different outlets. Following this peak in reporting in early 2015, a relatively steady stream of articles dealing with antiquities trafficking followed from late 2015 into 2016. During that time, the planned amendment of Germany's 2007 cultural property protection legislation became more prominent in the press, with journalists and interview partners still occasionally making the connection between antiquities trafficking and terror funding (see Section 4.1.7). In Chapter 5, I contextualised this development in the media with the amendment of the 2007 law into the 2016 *Kulturgutschutzgesetz* (KGSG). As noted in Section 5.2.1, this amendment was the result of a planned evaluation process that started in 2009 and culminated in the recommendation to amend the law in 2013 (see also (Neumann, 2013)). The two most prominent themes of the preceding media portrayal, the disproportionately high market figures given for the illicit antiquities trade, and the allegedly important role antiquities trafficking played for the financing of IS, were not present in the discussion about the law amendment (there was only one reference to terror financing, but no mention of IS), nor the new law text itself (see Sections 5.3.3 and 5.3.4). However, the official press statement attached to the adoption of the new legislation repeated at least the allegation of terror funding. After the adoption of the law, the topic faded out of the newspapers again (see Section 4.1.8), which suggests the end of a moral panic after

social or legal changes that were interpreted as a reaction of the authorities to public calls for action. With this last phase, I argue, the moral panic had run its course, fulfilling the last necessary criterium for a moral panic, *volatility*.

In the following section, I discuss whether the moral panic of 2014 to 2016 was truly a "moral panic about cultural heritage", or whether it had more in common with a general panic about terrorism, and how the two moral panics might overlap in this specific case.

7.1.2 Heritage panic or terrorism panic?

While I have concluded, from the development of the discourse in the media and around the legal changes, as well as from the market reaction, that a moral panic about antiquities trafficking did take place between 2014 and 2016, it is less obvious of what nature this moral panic ultimately was. That is, was it a heritage-related moral panic, or rather a terrorism-related moral panic that co-opted concern about heritage. Some scholars have argued that the fear of Islamic terrorism, sparked by the 2001 attacks on the World Trade Center, was essentially a moral panic (Rothe & Muzzati, 2004), and I would argue that it has become a recurring theme of moral panics, comparable, e.g., to the fears of immigrants, drugs, or child abuse, which have been identified as such (Cohen, 2002, p. xiv,xvi,xxii; Critcher, 2008, p. 1128). The distinction between a moral panic about cultural heritage destruction through antiquities trafficking, and a moral panic about terrorism financed by antiquities trafficking lies in its primary focus of *concern*.

The results of the news framing analysis done in Chapter 4 indicate that before 2014, the primary foci of concern in the reporting on antiquities trafficking were the destruction of cultural heritage, questions of legality, and occasionally, Germany's reputation with international partners (see Section 4.1). Connections between terror financing and antiquities trafficking were also made occasionally, but never became a major focus of the reporting before 2014 (see Section 4.2.3). From 2014 onwards, however, it was speculated in German newspapers, that the terror group IS funded their war effort, at least to a large part, through antiquities trafficking that fed into the "Western" market (see Section 4.1.6). While this speculation was, as far as is known at this point, severely overstated, it became a major focus of the media discourse on antiquities trafficking. The February 2015 peak of writing on antiquities trafficking (see Fig. 7.1) happened during a time of generally heightened anxiety about IS terror attacks in Europe. In the year 2015, Europol registered a "significant increase" in terror attacks on targets in the European Union, with one of the most widely publicised ones, the attack on the Paris satire magazine *Charlie Hebdo*, happening already in January (Europol, 2016, p. 22). Most of these attacks, according to Europol, were carried out by

individuals claiming affiliation to IS. At the same time, the terror group had managed significant territorial gains in Northern Syria and Northern Iraq, with their most notorious conquest to date being Mosul (on 10.06.2014; their arguably most notorious conquest from a cultural heritage point of view, Palmyra, happened after the peak of the moral panic in Germany, see Fig. 1.1).

News on any topic apparently connected with IS thus was likely to get the public's attention, because the terror group had been identified as a threat to the public by official as well as media sources. By linking the illicit antiquities trade to terrorism, the threat posed by antiquities trafficking became immediate and personal, which is a necessary condition for a moral panic (Cohen, 2002). It was implied in some articles that the next terrorist attack hitting German or other European and North American citizens could be funded by money from the antiquities trade, or, literally "the knives that cut off the heads of Western hostages could be financed by money from the antiquities trade" (Frey, 2014) [translation mine]). The previous concern for the loss of cultural heritage through looting, while still present in the media portrayal, became less prominent in comparison to the supposed threat of being hit directly by antiquities-funded terror attacks. These scenarios invoked in the writing reflect what Cohen calls having a "suitable victim" in the narrative, which should be someone the intended audience can broadly identify with (Cohen, 2002, p. xii).

I argue that there is also a second "suitable victim" in the media representation, and that this were the archaeological sites and artefacts considered "world heritage" by European audiences. This means in particular pre-Islamic Western Asian antiquities, especially from the literate cultures of the Bronze and Iron Ages. Heightened concern for these sites and antiquities had been expressed already before the time period that I identified as a moral panic (see Section 4.1.5). My identification of the targeted cultural heritage as "suitable victim" here is based in the view on Western Asian antiquities as "shared human heritage" taken on by the newspaper journalists (see Section 4.2.1). During their advance, the IS terror group published several videos of cultural heritage destruction in the conquered regions on their social media channels, which attracted widespread international media attention (Smith et al., 2015; Stein, 2022). While cultural destruction in the media by Islamic fundamentalists had been seen before, most prominently the destruction of the Bamiyan Buddhas by the Taliban in Afghanistan on live TV in 2001, the social media attention that IS reached to disseminate their actions had taken on a new scale here, both due to expanded technical possibilities, and the proficiency of IS in using these new media (Smith et al., 2015). In terms of moral panic, this behaviour of broadcasting their actions, both against cultural heritage and human lives, to a worldwide audience can be seen as an example of folk devils taking control of the narrative, by amplifying their own subjective threat level (Walsh, 2017). It is notable, however, that this interpretation, also promoted by the German and international media, has also

been called out as oversimplifying an altogether more complex picture of the terror group's actual goals and methods (Harmanşah, 2015).

In addition to the recurring folk devils in the form of terrorists, the antiquities dealers who allegedly funded the terrorists were also folk devils in this moral panic. *Hostility* directed towards the supposed enablers of the cause of a moral panic, who are seen as "ultimately" responsible and can become folk devils in their own right, is not uncommon in a moral panic (Cohen, 2002, pp. xxvi, xxvii). It should be noted that *hostility* against market actors dealing in illicit antiquities had been present in the media before the height of moral panic in 2014. It is only now, however, with the stronger focus on the alleged links between the two groups and the heightened anxiety around the presumed threat that the market became a folk devil in its own right.

The focus of *concern* in the media portrayal of antiquities trafficking clearly shifted from cultural heritage towards the fear of terrorist attacks funded by antiquities trafficking. However, the concern for cultural heritage stayed present in the reporting as well. As such, the moral panic can be called a moral panic about cultural heritage, albeit overshadowed by the moral panic about terrorism.

7.1.3 Two moral panics in one?

As discussed above, I argue that between 2014 and 2016, a moral panic about antiquities trafficking happened in the German media discourse, in which an existing concern for cultural heritage was suddenly overshadowed by concerns about terror financing through antiquities. This begs the question how these two media topics could become so inextricably linked.

Goode and Ben-Yehuda (Goode & Ben-Yehuda, 1994, p. 159) have discussed the question which forces are ultimately responsible for a moral panic. Their article distinguishes three possible origins for a moral panic, whether it stems from a concern in the general public (the "grassroots model"), is engineered by a small group of powerful people (the "elite-engineered model") or, as a sort of compromise between the two, is put forward by a group of people with a special interest in a topic, which is then picked up by the media and subsequently, a wider public (the "interest group model"). I argue that the grassroots model is the closest match for the 2014–2016 moral panic about illicit antiquities in Germany. The reason for this is that the moral panic was not intentionally pushed by a specific group with a certain agenda, which would indicate the interest group model, nor was it a campaign led by powerful people, e.g., politicians or other elites. Articles on the topic of antiquities trafficking suddenly rose in number first in the arts and culture sections of the newspapers and then found their way to the front pages for a short time. While they were written in part by the same journalists who had dealt with this topic before, that does not necessarily suggest an intentional

campaign. Instead, it is a general practice of journalists to follow their usual "beat" by writing about topics they are already familiar with. I argue that this sudden spike in public and media interest between 2014 and 2015 was rooted in what Goode and Ben-Yehuda (Goode & Ben-Yehuda, 1994, p. 161) call a "genuinely felt – if perhaps mistaken or at least exaggerated – concern". Cohen (Cohen, 2002, p. xxxvii) writes that "successful moral panics owe their appeal to their ability to find points of reference with wider anxieties". In this moral panic, the wider anxiety was the fear of terrorism, which gave the topic of antiquities trafficking unprecedented attention. In other words, the moral panic happened when existing concerns about conflict-related archaeological looting, and a vague traditional sense of "shared human heritage" with regards to Western Asia, became entangled with the more widespread fear of terrorism. Goode and Ben-Yehuda (1994, p. 161) also note that the grassroots variant of moral panic is often directed against a real or putative elite, which (presumed to be) wealthy and sophisticated antiquities dealers as folk devils would fit to. It should be noted here that an origin in the general public does not necessarily mean that the entire population, or even a majority, agrees, only that it happened spontaneously, and that there was a certain *consensus* among the interested audiences (Goode & Ben-Yehuda, 1994, p. 157).

The development of the moral panic may have been partly fuelled by journalists driven to make their audience care about antiquities trafficking, i.e., to make the topic a "story": McRobbie and Thornton (McRobbie & Thornton, 1995, p. 560) postulate that media can use a moral panic "to make home and social affairs newsworthy", and similarly, here, the media may have done so with the topic of antiquities trafficking, traditionally relegated to the arts and culture pages of the newspapers. The sheer number of articles, at least during the peak of the moral panic, indicates that the topic of terror funding through antiquities trafficking found resonance in editors and readers (see Fig. 2). The rumour that antiquities were sold to finance terror attacks had been around in Germany since at least 2005 ('Kunst als Terrorfinanzierung?', 2005). The desire to create attention for antiquities trafficking, during the time of the rapid advance of IS in Syria and Iraq, may have led to the linking of the two topics, which caused the moral panic. As Cohen (2002, p. 9) also writes, the general public is reliant on the information disseminated by mass media on topics they do not personally witness, and therefore also somewhat on their interpretations. This makes the press an actor in a moral panic in its own right. There never was a perfect *consensus* even in the media, and, as shown in Chapter 6, there was also a certain backlash from one of the groups designated folk devils, but this is not uncommon in the modern era, in fact, it has been argued that uncontested moral panics have become increasingly uncommon since Cohen's original study on the topic (Garland, 2008, p. 14).

After the amendment of Germany's cultural property protection law in 2016, media interest in the topic of antiquities trafficking faded again. However, any legal changes enacted after the media attention peak of late 2014 to early 2015 have been presented to the public in relation to the narrative of terror financing and interpreted the same way both by media and voices from the antiquities market. This is despite the fact that at least the law amendment in 2016 had been planned years before the rise of IS and their implication with antiquities trafficking (see Section 5.2.1.). Likewise, the reactions from market actors to newer EU laws and regulations on the import and trade in cultural goods, have concentrated on these allegations (see Chapter 6).

Due to the specific time frame of the moral panic, I argue that circumstances aligned in a way that was favourable to a moral panic. There had been a current of concerned writing in the newspapers on looting and antiquities trafficking in relation to conflict for about a decade by 2014, which was then amplified by the more pressing concerns, or "wider anxieties" (Cohen, 2002, p. xxxvii), about IS. This led to a heightened interest in the topic both by journalists (some of whom had been writing about the topic of antiquities trafficking for years by that time) and their audiences, or at least their editors. This is not to say that the moral panic was completely inevitable, but that two main concerns, about antiquities looting and about the terror group IS, coincided in a way that clearly favoured this reaction. The role of the media was pivotal in this development. As pointed out by Cohen (Cohen, 2002, pp. 9, 10), even if journalists do not actively, or consciously, engage in stirring up a moral panic, the way in which they report on a situation can create "concern, anxiety, indignation, or panic" (Cohen, 2002, p. 10). These feelings generate greater interest by audiences and editors in the topic, which in turn leads to more reporting in the same style, and more prominent placement of the topic (as in this case from the arts and culture sections even to the first pages of the newspapers at times), culminating in a moral panic. I argue that the two circumstances discussed above coinciding led to the development of the discourse on antiquities trafficking into the moral panic described in this thesis.

The focus on terror financing in both the news and public reactions to it left audiences with a distorted image of the problem of antiquities trafficking. The consequences of this distortion are discussed in more detail in the following sections.

7.2 The impact on the (German) antiquities market

Moral panics may be short-lived, but it has been noted that they always have some sort of lingering effect, be it institutional or merely informal, that is, social (Garland, 2008, p. 15; Goode & Ben-Yehuda, 1994, p. 168). Therefore, my second research question in this thesis was:

What are the consequences of this discourse for the antiquities market in Germany?

To answer this question, I use the results from my analysis of texts from the antiquities market in Chapter 6, but I also consider the lawmaking process analysed in Chapter 5. From the results of Chapter 4 I have argued above that antiquities dealers have been portrayed as folk devils in the media moral panic about antiquities trafficking that began to unfold in 2014 and early 2015. Groups portrayed as folk devils have been known to react to, and interact with, the moral panic they have been targeted in, in a variety of ways (Garland, 2008, p. 14; McRobbie & Thornton, 1995; Walsh, 2017). Therefore, this thesis also analysed the reaction by the antiquities market to this moral panic, and to the legal changes that were widely – if inaccurately – portrayed as its consequence.

It can be seen from Chapters 4 and 5 that the moral panic had no direct institutional legacy, despite the public presentation of legal changes suggesting otherwise. However, as Goode and Ben-Yehuda (1994, p. 168) argue, this does not mean that it had no legacy in the social sphere. One of the ways in which the social legacy of the 2014–2015 moral panic about antiquities trafficking manifested itself was through the reaction of antiquities market actors. My contextualisation of the themes that emerged from the media analysis with key texts from the antiquities market in Chapter 6 shows the backlash of a group portrayed as folk devils in a moral panic. It came in two main forms. The first was a rebuttal, in which the *hostility* towards antiquities dealers seen in the media was countered with equal *hostility*, while the *disproportionate* portrayal of the market value of illicit antiquities and allegations of terror funding were met with ridicule by voices from the antiquities market. This rebuttal is discussed in the following section 7.2.1, while the second form of backlash, community building, is discussed in section 7.2.2.

7.2.1 Rebuttal and ridicule

The most obvious reaction by the market to the moral panic is one of harsh rebuttal: On their own platforms, participants in the antiquities trade deny any connection to trafficking, let alone terrorism, often emphasising a distinction between the supposedly legitimate, and the illicit trade (see Section 6.3.2). This insistence on two distinct, "black" and "white" markets is an often-repeated claim by antiquities dealers in market countries that has been discussed in literature before (Mackenzie et al., 2019, p. 35), and does not hold up to the finding of the antiquities trade being a transnational criminal market that is "grey" at every step of the way, origin, transit, and market (Mackenzie & Yates, 2017). Mirroring the media reporting during the peak of the moral panic between 2014 and 2015, the analysed texts also put a clear emphasis on the allegations of terror funding, and more importantly, the lack of reliable evidence for them (see Section 6.3.3). Lack of

proof for wrongdoing is here often framed as proof of innocence. Generally, it becomes clear that in the analysed text corpus, market actors want to portray their trade as the victim of an unfair campaign of criminalisation.

While the term "moral panic" was not used specifically anywhere in the corpus of texts from market platforms analysed for this thesis, the ways in which the statements are put suggest that the authors see themselves as the folk devils, that is, the target of an exaggerated media campaign designed to hurt antiquities dealers, at least in their ability to do business. For example, one of the commentaries on the ILLICID preliminary report suggests that laws and regulations were crafted in reaction to the preceding allegations of terror financing, and seems to imply that the results may have been held back so as not to interfere with passing the laws: "Had the ILLICID report been published on its initial due date, soon after February 2018, its findings showing the lack of evidence might have helped mitigate the unnecessary harm that the new EU regulations are now likely to inflict on Europe's legitimate art market. Unfortunately, the extension meant that the ILLICID report was published at the same time as the new EU regulations. A coincidence?" (IADAA, 2019). This statement implies that the authors of the ILLICID-report had an agenda to hurt antiquities market actors, possibly due to the unproven allegations about terror financing, a theme that is quite prominent in the analysed texts from market platforms (see Section 6.3.3). It is useful to note here that the term "moral panic" has been used in the media, or by interested parties, to discredit the opposite side in a given discourse in the English-speaking world (Altheide, 2009; Hunt, 1997), but it is not a well-known phrase in German. However, the texts from market actors analysed in Chapter 6 were also partly written in English, and still the term "moral panic" was not used in any of them. Yet even without spelling it out directly, the reflection (through denial) of the themes of alleged links to terrorism, and the disproportional figures given for the illicit antiquities market, suggest that the authors of the analysed market texts are well aware that they are the target of a moral panic. As for the above-mentioned allegations toward the ILLICID project, it seems doubtful that an earlier publication of the report would have changed much in terms of the law, as the project was not linked to the lawmaking process either on a German national, or on an EU level. Nor were the legal changes enacted in Germany and the EU after 2015 linked to the moral panic that preceded them. This means, that the moral panic did not have any direct institutional consequences. Despite this, the analysed voices from the antiquities market often framed the amendment of Germany's cultural heritage protection law from 2016 as a direct consequence of the exaggerated reporting on antiquities trafficking and terror, thus creating the impression that this was a targeted law, resulting from a baseless media campaign, which would threaten the livelihoods of innocent businesspeople.

I interpret this as an attempt of folk devils to take control of the narrative about them, at least on their own media platforms.

Representatives of the antiquities market have been present in discussions and consultations on new legislation to regulate the trade in illicit antiquities, such as the 2016 law amendment in Germany, and regulations on EU level. Some of their demands were even taken almost verbatim into the law text, as will be discussed below. Yet despite all this, market criticism against the 2016 law and newer EU regulations regarding the import of cultural objects (including antiquities) in the analysed corpus of antiquities dealers' texts tends to portray them as powerless victims of unfair regulations based on false accusations. Portraying oneself as the underdog is a powerful narrative. And in this case, the moral panic preceding the changes in legislation gave the market a lot of material to work with. As discussed above, both the official press statement published on the adoption of the KGSG (*Die Neuregelung des Kulturgutschutzrechts*, 2016), and the project presentation of the ILLICID project (Hilgert, 2015), also relied heavily on a supposedly close connection of antiquities trafficking to terrorism and organised crime. These and similar statements, such as the press statement regarding EU regulations on the import of cultural goods (*Commission Presents Action Plan to Strengthen the Fight against Terrorist Financing*, 2017), have been used by market representatives as further evidence for the claim that they were the targets of persecution, and to dismiss the validity of the ILLICID project, as well as that of most legislation passed in the years since 2015 (IADAA, 2023). In short, the repetition of these overstated claims, not in news media, but by official organisations and academics, was used by those speaking for the antiquities market as evidence that these organisations and academics were biased and could not be trusted.

The repetition of rumours and factoids has been called out by scholars, noting that it does little to stop the illicit antiquities trade or educate the public about the harms of antiquities trafficking (Yates & Brodie, 2023, p. 1001). In this case, it might even have actively harmed this cause, by giving market actors the arguments to portray themselves publicly as innocents, persecuted by biased lawmakers believing in fiction.

7.2.2 Community building

The second notable way in which the market reacted to the moral panic was community building. After the changes in legislation in 2016, a number of antiquities dealers' associations in Germany formed a new umbrella organisation, the *Interessengemeinschaft Deutscher Kunsthandel* (Kunsthandel, 2019b). Their goal was explicitly to overturn or at least reach another reform and more market-friendly amendment of the KGSG (see Section 6.2.2). Moreover, several German and

European dealer's associations, as well as individual antiquities dealers started making more concerted efforts to "speak with one voice" against new rules and regulations on national as well as EU level, for example, by collectively endorsing a response to a new EU regulation published by one association, CINOA (see Section 6.2.4).

It is perhaps useful to remember here that the changes in legislation, at least on national level, cannot be said to have followed directly from the moral panic seen in the media. As noted above, the amendment of Germany's cultural heritage restitution law had been planned since 2013, as the result of an ongoing process of evaluation of the original law from 2007. Despite the framing used by the lawmakers themselves, the press, and by voices from the antiquities market, it was not a reaction to the preceding moral panic about terror financing through antiquities.

In the case investigated in this doctoral thesis, however, it is quite clear that antiquities dealers in Germany actively sought to form a closer-knit community to counteract the bad press and legislation that was seen as possibly detrimental to their trade. The negative reaction to the 2016 law amendment in Germany marks a notable difference from earlier legal changes in market countries. One study of participants in the antiquities market in the UK, for example, suggests that some were not even aware of the change in UK cultural property legislation that happened in 2003, while some others apparently were aware, but unbothered (Mackenzie & Green, 2007). Neither did the ratification of the UNESCO convention by Germany in 2007 and the following law lead to any comparable concerted action in the antiquities market that could be found in this study. One difference between these situations is the moral panic that preceded the amendment in 2016. One reaction to the shared experience of being branded a folk devil has been studied by Waldron (2005), investigating the panic that connected roleplaying games such as *Dungeon & Dragons* with satanism in the 1980s. One of the results of this panic, Waldron argues, was the increasing self-definition of roleplaying gamers as a subculture, and the formation of a community. This community building reflects the reactions of other folk devils, even going back as far as to the youth cultures the term was originally coined for (Garland, 2008, p. 13). While the experience of roleplaying gamers targeted in a "Satanic Panic" and other youth cultures certainly differs from that of generally respected antiquities dealers suddenly suspected of funding terrorism, the reaction to form a closer-knit community does constitute a parallel. In the long run, this increased strategic collaboration may bolster the influence of antiquities trade associations, at least in Europe.

7.2.3 A suitable enemy?

This section brings together the two previous sections and weighs the question in how far participants in the antiquities market are fulfilling their role as folk devils. That is, if they make a "suitable enemy" (Cohen, 2002, p. xii) according to current moral panic analysis, and whether they really are as powerless against the allegations of the media as it is often implied in their own texts. The "grassroots model" of moral panic, which I have concluded above is at play here, often includes some hostility against "elites" (Goode & Ben-Yehuda, 1994, p. 162). This does fit with the *hostility* shown in news media against antiquities dealers noted in Chapter 4, which led me to conclude that they were folk devils in the first place. It can be said that the antiquities market did not, during the time researched, have the media on their side in the discourse on antiquities trafficking in Germany. In a moral panic, the reactions of folk devils can vary, resulting in different consequences including what has been called "amplification" and "transformation" of their perceived deviance (Garland, 2008, p. 14). Some folk devils have been known to "play up" their own perceived deviance towards the mainstream audience, in hopes to create a counterculture for social or monetary gain (McRobbie & Thornton, 1995; Waldron, 2005). Conversely, the antiquities market's reaction to the media portraying it as a folk devil was one of denial and dismissal of the allegations, and a strong insistence on the distinction between "legitimate" and "illegitimate" business in the antiquities trade. The common point between these two forms of reacting to a moral panic is that both create more attention for the topic itself. On their own channels, where they control the narrative, antiquities dealers and dealers associations were able to show a notably different picture of their trade than was at the same time shown in the media. This may not have reached the general public in a lasting way, but at least within their own "bubble", that is, also toward potential buyers and collectors, the antiquities dealers seem to have saved face.

The bad press, which is evident from Chapter 4, does not seem to have diminished the influence the antiquities market has, through representatives of trade associations, on the lawmaking process. An example for this in the context of the KGSG is its treatment of ancient coins as an exception from being protected as antiquities. The law specifies that "coins are exempt from the classification as archaeological objects if they exist in large numbers, they have no relevant archaeological value and are not protected individually by a member state": "Münzen gelten nicht als archäologische Gegenstände nach Kategorie 1 des Anhangs I der Verordnung (EG) Nr.116/2009, wenn es sie in großer Stückzahl gibt, sie für die Archäologie keinen relevanten Erkenntniswert haben und nicht von einem Mitgliedstaat als individualisierbare Einzelobjekte unter Schutz gestellt sind" (KGSG, 2016). This passage reflects almost *verbatim* the demand Christian Nicol Worbs, president of the

German Numismatic Society (*Deutsche Numismatische Gesellschaft*) made at the *Bundestag* cultural committee session preceding the adoption of the law (Ausschuss für Kultur und Medien, 2016). Coins then should not be treated as antiquities because they are not unique. This argument ignores the fact that the archaeological context lost through digging for coins is no less than for any other object category. In fact, coins, together with cylinder seals and cuneiform tablets, have been identified as one of the primary targets for looting in Iraq around the time of the 2003 invasion, leading to the devastation of archaeological sites from the Achaemenid and Parthian eras that looters can identify as such through their surface assemblages (Stone, 2008, p. 135). The global online illicit coin trade is a thriving business, especially on eBay (Hashemi & Waddell, 2022; Wartenberg & Dmitričenko, 2022). Unprovenanced coins from all over the world are sold in market countries with the backing of vociferous coin collectors' associations (Elkins, 2022).

In sum, it can be said that the antiquities market does not entirely fit the bill of a "suitable enemy" *sensu* Cohen (Cohen, 2002, p. xii), who is "a soft target, easily denounced, with little power and preferably without even access to the battlefields of cultural politics". The trade was certainly subjected to *hostility* in the media reporting, especially during the peak of the moral panic, and can be identified with a putative financial and educational elite, against whom the sentiment of the general public can turn in a moral panic, at least following the "grassroots" model (Goode & Ben-Yehuda, 1994, p. 162). It seems that the market in this time did not have even access to public media channels as one such "cultural battlefield", or at least, did not use it. Instead, dealers and trade associations turned to their own channels to tell their side of the story.

The transient phase of bad press does not seem to have destroyed the German antiquities market as such, despite many protestations to the contrary (see Chapter 6). The actual financial impact of the legal changes during the researched time period on the businesses of antiquities dealers in Germany is beyond the scope of this thesis, but it has to be remembered here, that at least the amendment of the law in Germany was not a result of the moral panic, and market representatives had at least even representation in the lawmaking process as other stakeholders.

7.3 Impact on society

Continuing from the finding that moral panics have a lasting legacy, the next question concerns the impact of this moral panic on the broader German society. My research question was:

Which lasting impact did the discourse have on society?

This is perhaps the hardest research question to answer, as subtle changes in life for the general public are hard to assess with the methods used in this thesis. It can be said that this moral panic did

not lead to obvious and profound changes in behaviour for the general society. One such would for example be a radical change in attitude towards the antiquities trade leading to sharp drops in sales, such as has been claimed happened for the fur trade (Mackenzie et al., 2019, p. 55). A consequence like this, however, cannot be observed here. It is possible that antiquities dealers were viewed with more suspicion overall after 2014, but if so, it is mainly visible in the affirmations of antiquities dealers and trade associations to potential customers, referring to codes of ethics and professing legitimate trade (*Kulturgüterschutz – International Association of Dealers in Ancient Art*, 2023). What can be seen are some changes in the ways journalists were treating the topic of antiquities trafficking in general, and in connection with armed conflicts in Western Asia specifically, that is, how the framing changed over the time researched. News framing affects how readers view a topic, and what information they can go on to form an opinion. As has been noted before in this chapter, the framing of the topic of the conflict-related trafficking of antiquities from Syria and Iraq in the time period researched here, but especially between 2014 and 2016, presented a distorted view of the problem. Some of the effect this may have had on general audiences can be gauged from the results of the media analysis made in Chapter 4, and reactions to the media treatment of the topic, analysed in Chapters 5 and 6. These effects, treated in the following sections, included: A narrowed view on the topic of antiquities trafficking with a focus on terrorism (Section 7.3.1), changes in the language used to talk and write about cultural heritage (Section 7.3.2), and a notable silence about the topic since the end of the moral panic (Section 7.3.3).

7.3.1 The terror focus

A moral panic, as Garland (2008, p. 15) notes, "sells papers, entertains readers, and generates further news and commentary as the story unfolds", which gives media professionals a strong incentive to play it up. It can be seen from the results of this doctoral research, that this opportunity was seized by German newspapers when the topic of antiquities trafficking in Syria and Iraq became linked with the terror group IS. As noted above, linking a story to IS was virtually guaranteed to generate attention in 2014 and 2015, due to the recurrence of the more general moral panic relating to Islamic terrorism. Fear of Islamic terrorism became a moral panic in its own right after the attacks on the World Trade Center and the Pentagon in 2001 (Rothe & Muzzati, 2004). I argue that terrorism has become a recurring topic of moral panic, in spite of mainstream media's hesitation to brand it as one, discussed by Altheide (2009, p. 93). It is perhaps noteworthy that recurring moral panics, such as panics about child abuse and drug taking, are argued by Garland (2008, p. 13) to add significance with every time they reoccur. Following this theory, the anxiety

about the terror group IS at the height of their success would have been the most acute yet when it coincided with the moral panic about antiquities trafficking between 2014 and 2015.

By that time the IS terrorists had already made themselves known internationally as destroyers of cultural heritage in the territories that they had conquered (Smith et al., 2015; Stein, 2022). As other factions in the Syrian civil war, they engaged in archaeological looting, among other activities, to fund their war efforts (Almohamad, 2021; Sabrine et al., 2022). As noted in Section 4.1.6. of this thesis, their part in the looting then led to an unprecedented number of articles on the topic of looting and antiquities trafficking in the Syrian civil war, linking the topic of the illicit antiquities trade almost inextricably to the terror group and implicating the international and the German antiquities market with the financing of IS and potentially other terrorists. The problem of antiquities trafficking was, as the media analysis in this study shows, quite misrepresented in the newspapers at the time.

It is notable here, that the conflation of terror funding and antiquities looting has roots dating back at least to the aftermath of the 2001 attacks on the World Trade Center. The seed of this narrative may have been laid with the report that Mohamed Atta, one of the 9/11 attackers, tried to sell antiquities from Afghanistan to a German archaeologist, presumably to secure funds for the planned attack ('Kunst als Terrorfinanzierung?', 2005). In some articles analysed for this thesis published after 2003, the word "terror" is used also in reference to conflict-related looting, without making any specific connection to terrorist activities in the area (Zekri, 2005b). This framing may be based in the vague and ill-defined rhetoric of the "War on Terror", which has at times been used to reference any kind of conflict in Western Asia (Lewis & Reese, 2009; Reese, 2009).

The consequence of this exaggerated portrayal of IS's part in the looting of Syria, for the general public at least, is a rather distorted view of the problem of antiquities trafficking, perhaps in general, but certainly with regards to the Syrian civil war.

7.3.2 Changes and continuities in language

One of the most striking results of the media analysis in this thesis was a gradual shift in the lexical choices made by journalists writing about antiquities looting. In most of the earlier articles analysed, antiquities are described as "treasures", which is then gradually replaced by terms such as "cultural heritage" or "cultural property" in later news articles, sometimes even "archaeological finds" (see Section 4.2.1). Also regularly used in the earlier analysed newspaper articles for looted antiquities are terms framing those antiquities as "art", which also become somewhat less popular as time progressed. An exception to this is the word "Raubkunst", which means at once "looted art"

and "spoils of war". This term is used throughout the analysed text corpus. Overall, however, the language used to describe antiquities increasingly reflects a greater focus on their meaning to culture and archaeology than their artistic or monetary value. It should be noted that this change did not happen suddenly with the moral panic in full swing (between late 2014 and early 2015), but gradually, starting during the 2003–2007 Iraq war, and becoming more pronounced during the Syrian civil war, in 2012 and 2013, and after. This change was not a by-product of the moral panic, but apparently more of a by-product of the growing concern for Western Asian heritage (often framed as "world heritage" or "shared human heritage") during the armed conflicts of the early 21st century.

Meanwhile, the analysis also shows some evidence for certain orientalist tropes in the media discourse on antiquities trafficking. For example, in some of the articles analysed in this study (Bauer, 2007; Waser, 1997), a certain romanticised notion of looting as a sort of "treasure hunt" can be seen, which seems rooted in earlier colonialist ideals of bringing back exotic artefacts from a grand tour. This happens especially in the earlier articles where antiquities are more often framed as "treasure", and gradually falls out of use.

However, some framing devices that conjure a romanticised image of "the Orient" persist. For example, another consistently popular lexical choice is the term "Mesopotamia". Both journalists and antiquities dealers in the analysed texts use this ancient-sounding word for the region between Euphrates and Tigris, from Iraq to Eastern Syria and parts of Southeastern Turkey. As discussed in Chapter 2, it has been shown that this use of the term is relatively recent, dating back only to the first world war (Rattenborg, 2018). It has been argued that the term "Mesopotamia" could be traced back to a colonial idea of the "Orient" as humanity's past, as opposed to the Euro-American colonisers as the present (Bahrani, 2018), although it is nowadays used fairly innocuously. It is, however, also used by dealers and auction houses in the sales descriptions of ancient Iraqi and Syrian artefacts, thereby obscuring links to modern conflict zones, as has been noted by Brodie (Brodie, 2011a, p. 123). The practice of using more geographic or historical terms for the provenience of antiquities is used in the antiquities market also beyond Western Asia to effectively "sanitize" questionable lots and to avoid inconvenient questions regarding their provenance (Mackenzie et al., 2019, p. 31).

The focus on terrorism, both in the media and in subsequent public-facing announcements by lawmakers and researchers, can also be argued to be orientalist itself (Mooney & Young, 2005). It reflects an older legend of "constant war in the Middle East", based in the narrative of the "Orient" as barbaric. The trope of constant war and insurgency can be traced back to the construction of the dichotomy between the "civilised West" and the "barbaric East" (Said, 2003). In fact, the term

"barbaric" has been used in German newspapers analysed here, with reference to the actions of IS against cultural heritage and human beings, and even as a general descriptor for the Syrian civil war itself (Doering, 2014b). Also the interpretation of IS's cultural heritage destruction spree as a "message to the West" can, despite its proliferation on social media, be seen as a decidedly Eurocentric view (Harmanşah, 2015).

As noted above, frames used in media are culturally embedded (Van Gorp, 2009). It has been noted that the colonial interpretations of Western Asia during the 19th century have shaped how people in Europe and North America still think and talk about this region even in the 21st century (Helle, 2016; McGeough, 2024). It is then perhaps not entirely surprising that some orientalist tropes have been noted in the media discourse on antiquities trafficking from Western Asia in a former colonising country such as Germany. They are an indication that the target audiences of the newspapers analysed see the history and cultural heritage of Western Asia, as well as the present-day conflicts, still at least partly through a Eurocentric and orientalist lens built on Germany's colonialist legacy. As news framing at once shapes, and is being shaped by, how a society sees the world, the prominent repetition in the course of a moral panic may have contributed to the perpetuation of a colonial worldview already present in German audiences.

7.3.3 The legacy of a public discourse

A quote that is, ironically, often falsely attributed to the American writer and journalist, Mark Twain, says "A lie can travel halfway across the world while the truth is putting on its shoes." In more recent times, it has been shown that false news may spread faster and more widely than true stories and corrections, especially if disseminated on social media (Vosoughi et al., 2018).

Despite the concentration on newspaper articles in the media analysis chapter of this study (Chapter 4), which was done for various practical and methodological reasons explained in the methodology chapter (Chapter 3), some themes could be seen to emerge from the media reporting on antiquities trafficking in the time from 1991 to 2021, which have had a wider impact on society.

An exaggerated and distorted, if not strictly false, view on the illicit antiquities market can be seen as one of the consequences of the moral panic on antiquities trafficking that happened in Germany between 2014 and 2016. After the short-term peak in media attention on antiquities trafficking, the topic has faded again from the public discourse. However, it has had an impact on the policies and lawmaking efforts regarding antiquities trafficking in Germany and the European Union, at least in the way new laws and regulations are presented to the public (see Chapters 5 and 6). The conflation of the illicit antiquities trade with terror financing and specifically IS may have done nothing

substantial to help curb the trade in looted antiquities, but it did generate some attention, for better or worse, for new policies designed to protect foreign cultural heritage from trafficking in Germany. Every moral panic eventually dissipates, which in the case studied in this project, happened after the 2016 amendment of cultural property legislation in Germany. The last article found via Nexis during the data gathering phase of this thesis is from 2020, describing an auction of 3000 illicit antiquities seized by Bavarian police from an antiquities dealer in 1998 (Koldehoff, 2020). While the article, published in the culture section of the Berlin-based daily newspaper *Tagesspiegel*, describes the legal situation of the antiquities within German jurisdiction and mentions an Iraqi restitution claim, there is no trace of the preceding moral panic evident in the writing. It is the only article found for that year on Nexis. For 2021, the last year researched in this study, the Nexis search yielded no results with my predefined search terms.

By the time of writing these lines, roughly four months after the fall of the Assad regime in Syria in December 2024, occasional reports of continued archaeological looting in the North of the country can be found by a casual search on Google and DuckDuckGo, but they are rare. Within the limitations of my study sample (defined in Section 3.1.1 of this thesis), it seems as if the moral panic has left no traces in the analysed body of newspaper articles after it had run its course, and even while Syria itself has become a news topic again, there is little evidence that it might reoccur.

8 Conclusion

The present thesis is an analysis of the discourse about antiquities trafficking in relation to the then current conflicts in Iraq and Syria between 1991 and 2021, using the sociological concept of moral panic as a theoretical framework. I investigated changes in how the transnational trade in illicit antiquities is portrayed by general media in a market country, in this case, Germany, and how market actors and lawmakers reacted to this portrayal. Using the concept of moral panic for this analysis has proven useful, because it explains a phenomenon noticed by antiquities crime researchers beginning around the summer of 2014 (Loges, 2024; Losson, 2017; Sabrine et al., 2022; Yates & Brodie, 2023): a heightened media interest in antiquities trafficking, which relied upon rumours of terror financing, overblown figures for the overall monetary value of the illicit antiquities market, and other factoids. By analysing German-language newspaper articles dealing to some extent with the trafficking of Western Asian antiquities, I determine that a moral panic did indeed take place between 2014 and 2016. The conclusions drawn from this finding, as well as the implications and the consequences this moral panic had for the antiquities market and society in Germany, are presented in the following sections.

8.1 Answers to the Research Questions

Following from the considerations laid out in the preceding chapters, the research questions presented at the beginning of this thesis have been addressed as follows:

Can the discourse on antiquities trafficking in Germany be called a Moral Panic about cultural heritage?

Not entirely. This thesis followed the development of the media and public discourse on antiquities trafficking in connection with the then current conflicts in Iraq and Syria in the time period between 1991 and 2021. The first observation was that looting and trafficking of Western Asian antiquities was not written about in German-language newspapers, at least not using the terms used as search terms in this study, in the direct aftermath of the 1991 gulf war, and the later 1990s. In other words, a media discourse on the topic apparently did not take place at the time. Only with the 2003–2007 Iraq war did conflict-related antiquities looting and trafficking, become a semi-regular topic, if mostly confined to the arts and culture sections of newspapers.

When the discourse became a moral panic – starting in the second half of 2014, and lasting until 2016 – it was tied inextricably to the fear of the terror group IS. This moral panic went along with a sharp increase in the number of articles written on antiquities trafficking related to the Syrian civil war, some of them appearing even in more prominent sections of the newspapers. I identified what

happened as a variant of the "grassroots model" of moral panic, in which a genuinely felt concern in society spins out of control (Goode & Ben-Yehuda, 1994). Atrocities committed by the terrorists were linked to antiquities trafficking in the media through warnings such as "the knife that kills the next Western hostage may have been financed by antiquities dealers" (Frey, 2014) [translation by me]. This framing turned the topic of antiquities trafficking from a somewhat abstract concern about cultural heritage into a threat that is imminent, and directed against people the target audience of the newspapers identify with: "Western", i.e., Euro-American, civilians, in other words, what Cohen (Cohen, 2002, p. xii) calls "a suitable victim".

The moral panic itself consequently did not center the concern for cultural heritage as much as it did the concern for public safety. However, a concern about the destruction of cultural heritage remained an integral part of the media reporting and therefore the discourse can at least partly be called a moral panic about cultural heritage. Aside from the IS terrorists, antiquities dealers and collectors also emerged as folk devils.

So in sum, the discourse between 2014 and 2016 was a moral panic about both terrorism and cultural heritage, while the general reporting on the topic of antiquities trafficking and the German antiquities market's implication in it, starting around 2003, represents a somewhat more nuanced discourse, possibly hinting at a shift in how people, that is, at least the writers and readers of the culture sections of newspapers, think about the protection of cultural heritage against looting.

What are the consequences of this discourse for the antiquities market in Germany?

With the link to terrorism, the topic of antiquities trafficking was at once promoted and exaggerated, and distorted almost beyond recognition, leading to many more articles on the topic, which even appeared in more prominent parts of the newspapers, but narrowed down to the IS connection and citing disproportionate sums the terrorists supposedly made from antiquities trafficking.

Exaggeration and distortion by mass media are a distinguishing feature of a moral panic (Cohen, 2002; Goode & Ben-Yehuda, 2010, 2011).

While this moral panic was not responsible for the amendment of the cultural heritage legislation in Germany, it was framed as such for the more general public, as can be seen from the official press release (*Die Neuregelung des Kulturgutschutzrechts*, 2016).

The surge in public interest in the topic of cultural heritage protection following this moral panic led to a temporary loss of reputation by the antiquities trade in general, being portrayed as a folk devil in its own right. However, since allegations of terror funding could not be substantiated, and the disproportionate figures given for the monetary value of the illicit antiquities market in the media

were mostly debunked, market actors could easily cast themselves as victims, rather than villains, at least on their own platforms.

Since new laws and regulations both in Germany and the EU were presented as a reaction to the moral panic even by the lawmakers themselves, spokespersons of the antiquities trade used the opportunity to turn this argument against the new legislations. In this sense, the antiquities market in Germany seems to have saved face overall, despite the bad press temporarily directed against it. Moreover, the backlash against the new laws and regulations was organised over several trade associations, as the moral panic had led to a form of community building in the antiquities market.

Which lasting impact did the discourse have on society?

My research shows that the media portrayal of antiquities trafficking in Germany between 2014 and 2016, which seems at least partly parallel to the ones in other European and North American countries, has left the German public with a decidedly distorted view of the problem.

The focus on terrorism and terror financing, and generally on Iraq and Syria, caught the attention of a wider audience for a while, but distracted from a more complete view on antiquities trafficking as a global problem. Also, some of the lexical choices made in the media about IS, and especially the terrorists' campaign of destruction against cultural heritage as well as their alleged antiquities trafficking, perpetuated orientalist tropes about Western Asia, such as the dichotomy of "barbarism" vs. "civilisation".

While, as mentioned above, a certain better awareness of the harms done by the illicit antiquities trade are seen to emerge from the longer development of the discourse over almost two decades, it is more than doubtful whether the moral panic of 2014–2015 led to a better understanding of cultural heritage protection in the general population of Germany.

In the end, the moral panic ran its course and dissipated without much of a trace in the media record after the amendment of Germany's cultural heritage legislation in 2016.

8.2 Significance and Implications

The present thesis is an interdisciplinary study combining methods from media analysis and sociological theory to shed light on an archaeological issue. I used the sociological concept of moral panic to help structure my understanding of the media treatment of antiquities trafficking and its social and intellectual consequences. With this method, I was able to characterise the public experience of an aspect of Western Asian archaeology that was broadly and emotionally discussed

in Germany (and beyond) during a period of at least subjective concerns about public safety connected to the political situation in Western Asia, specifically, Iraq and Syria.

8.2.1 Contribution

This study is the first analysis of the discourse on antiquities trafficking in Germany and in the recent decades, and to my knowledge, the first discourse analysis focusing on the antiquities market overall. It shows clearly some of the pitfalls of moral panic, namely an over-reliance on rumours and factoids by media professionals, but also by both researchers applying for funding (Hilgert, 2015) and lawmakers in the public presentation of new laws and regulations against antiquities trafficking (*Commission Presents Action Plan to Strengthen the Fight against Terrorist Financing*, 2017; *Die Neuregelung des Kulturgutschutzrechts*, 2016).

As such, the present study has implications for the regulation of the global trade in illicit antiquities. It has become clear from this research that publicly framing changes in legislation to regulate the trade in antiquities to fit a current moral panic, does not help the law's reputation.

My analysis added to the field's collective knowledge about the market in illicit antiquities, specifically, the German antiquities trade, especially regarding the self-perception and media strategies of antiquities dealers. The platforms of the antiquities market used the sensationalist framing of antiquities trafficking as an important source of revenue for IS as an argument to publicly dismiss new legislation meant to curb the illicit antiquities trade in Germany and the EU. Antiquities crime researchers have repeatedly asked for a more robustly data-driven research basis for policies aimed to prevent antiquities trafficking (Brodie et al., 2021; European Commission et al., 2019) and the present study shows an example of why this is still an important shortfall in the policy making.

Researchers have also repeatedly called for better communication between archaeologists, funding bodies, policy makers, and the media, to avoid misplaced research and policy foci. The results of my analysis could strengthen this goal by allowing the development of safeguards against a drift into moral panic within our discipline, if only by recognising a moral panic when it starts to happen.

By applying moral panic theory to the media discourse on antiquities trafficking since 2003, but more specifically, the time between summer 2014 and spring 2015 my analysis contributed a more nuanced and informed understanding of this period in recent archaeological history.

8.2.2 Methodological Implications

Finally, from a methodological point of view, this project can serve as an example for how news framing analysis, assisted by deductive coding, can be used successfully to identify and analyse moral panics. Following both the "processual" model of moral panic analysis put forward by Cohen (2002) and the "attributional" model of Goode and Ben-Yehuda (2010), (Critcher, 2008, 2017), my news framing analysis (see Chapter 4 and Appendix) showed, not only **when** the media discourse on antiquities trafficking became a moral panic, how it played out, and what prompted it to die down, but also, crucially, what the individual characteristics of this moral panic were: *Concern* about cultural heritage, but also *concern* about terrorism; *hostility* towards terrorists, but increasingly also against antiquities dealers and collectors; *disproportionate* monetary figures given for the value of the illicit antiquities market in general, but also for the money made through antiquities trafficking by the terror group IS specifically.

My method shows that, while some of these characteristics had a longer legacy in the discourse about antiquities trafficking, only their combination into a moral panic brought them to the prominence noticed so acutely by archaeologists of Western Asia, antiquities crime researchers, and the general public. As such, the methodology of this thesis can be used as a template for moral panic analysis in other fields of study, or even to analyse the same discourse in other Euro-American market countries for illicit antiquities, to form a larger study and achieve a more complete picture of this moral panic and the social and intellectual consequences resulting from it.

8.3 Limitations

What this study cannot show is the actual size of the illicit antiquities market in Germany, before or after the moral panic, in terms of monetary value, in terms of criminality according to new or old legislation, or in terms of measurable harm done. This is also because the antiquities market is still, in many ways, a black box, a grey market whose inner workings are rarely shared with outsiders (Mackenzie et al., 2019). In this sense, this analysis of only the public discourse about the illicit antiquities market in Germany could not definitely show any direct financial consequences either of the moral panic or the legal changes during the researched time period.

Moreover, the media analysis of this study uses newspaper articles only, as explained in detail in Chapter 3. That means, the way the moral panic unfolded on other media, and especially social media, was not analysed in this study. I realise that an analysis of how this discourse played out on social media would also make a fascinating topic for a study, but one that would have necessitated a different approach. For example, with the vastly larger amount of data, a detailed news framing

analysis would not have been possible within the scope of a doctoral research project, which would have led to the loss of some of the more nuanced findings in this study.

On that note, it would also have been interesting to see how this discourse played out in other countries and languages, especially, the UK and the USA. It can be inferred from known literature that the moral panic occurred somewhat parallel in other European and North American market countries for Western Asian antiquities. For example, a 2016 report from the American Department of Homeland Security on the financial infrastructure of the IS terror group claims disproportionate figures for the alleged part that antiquities played in their income, citing mainly media sources (Homeland Security Committee, 2016). Some developments, however, happened quite differently. For example, the murder of Syrian archaeologist Khaled al-Asaad by IS militants, and the attached rumours about treasures supposedly buried in Palmyra that sprang up around it, were much more prominent in the English-speaking world.

Again, while investigating these narratives would have been fascinating, this was not done in this thesis, at least partly to limit the scope of the study to what is doable in a doctoral project. Germany was chosen as the case study for this project since it had a legislation change in the wake of major media attention on antiquities trafficking, and as an EU country with a significant antiquities trade.

8.4 Future Research

As some conflicts end, others change, and new conflicts erupt, both in Western Asia and globally, the problem of conflict-related antiquities looting and trafficking remains topical. The cultural heritage of Sudan, Yemen, Gaza, and Ukraine, among others, are acutely at risk at the time of writing this conclusion, not only of falling victim to collateral damage, but also, if perhaps to a smaller degree, to looting. This ongoing problem makes the funding of more and better research into the as yet obscure parts of the illicit antiquities market all the more important. This could mean looking at the problem more in terms of white-collar, that is, financial crime. As noted shortly in Chapter 2 of this thesis, trafficking is "just business" (Mackenzie, 2020), albeit an illicit one. As a potential topic for future research, the media treatment of antiquities looting and trafficking in other conflict areas, and the public perception of archaeology resulting from it. One such region is certainly Israel and Palestine, not only in the context of the current conflict, but also in a wider lens on the development of the recent decades. A discourse analysis on the treatment of cultural heritage and antiquities by media, heritage professionals, and politicians in Israel would certainly be an important contribution for the understanding of how the archaeology of the Holy Land is still used by various factions to serve very current political purposes.

Moreover, as hinted at above, in Limitations, the proliferation of this moral panic, and other archaeological rumours and narratives, on social media, as well as their real-world implications and consequences, would also be a fascinating topic for future research. This should necessitate a different set of methods, including the application of big data research methods. In even further studies, this could also be expanded to studying internet rumours even from the realm of pseudoarchaeology.

8.5 A look ahead

The present doctoral thesis shows an example of a moral panic that left the general public in Germany with a gravely skewed view of the harms and the nature of the illicit antiquities market, but even researchers and policy makers are missing important information. I argue that this can also lead to wrong conclusions and potentially misplaced research foci.

As a journalist who has worked as a public relations officer for archaeological projects, I know that the general public remains fascinated by archaeological topics. The analysis I made in this study also showed that people are often willing to run with an exciting story rather than boring facts, which especially in circumstances of conflict and human suffering, is quite upsetting.

Following from these points, I want to reiterate here that the trade in illicit antiquities looted in times of conflict, poverty, or political crisis, which causes harm both to the archaeological record and to the communities subjected to the looting of their heritage, cannot be stopped by policies made without a robust basis in research (Brodie et al., 2021; European Commission et al., 2019; Yates & Brodie, 2023). This calls for better media strategies and better communication between researchers, funding bodies and policy makers. I argue that uncovering the moral panic gripping the discourse on antiquities trafficking in Germany between 2014 and 2016, as this study has done, is a step in that direction.

APPENDIX: NEWS FRAMING ANALYSIS

A.1 Timeline of news: individual articles

This section contains the individual news framing analyses of the 75 articles selected through targeted searches on Nexis. They are presented here with minimal commentary. The section 4.2.1 Timeline of news, in the main document, brings together the overarching news trends and clarifies the results of the overall analysis with a graphic.

Before 2003

1 Title: Raubkunst - unvergangaene Vergangenheit

Publication: Neue Zürcher Zeitung (NZZ)

Date: April 15, 1997

Section: FEUILLETON

Author(s): Georges Waser

Article Genre: Report

Search Term: Antikenschmuggel - 1

Operational Research Questions:

Which words are used to describe looting at source?

- Raubgrabungen, die Plünderung von Museen und der Schmuggel, oft aus durch Unruhen und Krieg zerrissenen Ländern ("looting" and "smuggling" from "countries torn apart by riots and war")
- Länder, deren kulturelles Erbe im Sog politischer Wirren zur Freibeute wurde (cultural heritage becoming "booty" or possibly "easy targets")
- systematische Plünderungen ("systematic looting")
- Verwüstung archäologischer Fundorte und Sammlungen - "devastation"
- Raubgräber (looters) "Beutejäger" (literally "bounty hunters"? Somewhat romanticised wording for illegal diggers)
- Wie wild in Afghanistan geplündert wird, bezeugen ... "wildly plundered"
- aus dem Museum verschwunden ("disappeared": no actor)
- fortgesetzten Plünderung der pharaonischen Nekropole
- Nachwehen des Golfkriegs ("aftermath of the gulf war", framed as a natural occurrence)

- Sowohl die Not der Bevölkerung als auch eine ungenügende Altertumsbehörde ("both the suffering of the population and a lacking antiquities authority")
- Begleiterscheinung der Unruhen - "side effects of political unrest"

Which words are used to describe *the antiquities market and market actors*?

- "Dunkelmänner" - invisible, inscrutable bad actors
- Boom im Antikenhandel - steigende Nachfrage (economic language)
- rasante Zunahme des schwarzen Marktes ("rapid increase" implies a threat/urgency)
- Drahtzieher (negative meaning, implies sinister and/or illegal goals, manipulation of others)
- in den Basaren von Peschawar, Islamabad oder Karatschi (definitely orientalist - the word "Basar" indicates romantic ideas of souqs, as well as "unregulated", semi-legal trade)
- Wenn die Beute schliesslich den Markt und die Kenner erreicht (no expertise at source)
- meist finden sie darauf den Weg nach Europa, Amerika und Japan (objects "find their way" to market countries - agency attributed to objects, not traffickers)
- sogenannte Experten in Grossbritannien verdienten sich mit dem Beglaubigen von gestohlenen Antiken ihren Lebensunterhalt - "so-called experts" (as opposed to real experts)
- "Mittelsmänner" - middlemen, meaning specifically Tokeley-Parry
- if market actors are named, they are called "umsichtig" (careful) or "virtuos" (skillful) - evoking a "gentleman thief" trope?

Which words are used to describe *antiquities*?

- "Beute" - loot, booty, plunder
- Handel[s] mit geplündertter Kunst (art for cultural heritage)
- geraubten Kostbarkeiten (implies value - monetary or otherwise)
- Prunkstücke (implies beauty, splendour)
- Objekte von zweifelhafter Herkunft ("objects of dubious origin")
- Kunstgegenstände der Sumerer (art objects of the Sumerians - not Iraqi cultural heritage)
- hellenische Schätze ("hellenic", i.e. classical - no knowledge of where they come from, also "treasure")
- Antiken (antiquities)
- Raubkunst aus Ägypten (a word originally used for spoils of war, often also Nazi-looted art)
- Schmuggelware (contraband)
- Kunstgegenstände (art objects)

Which devices are used to get/keep the reader's attention?

- Title: unvergangene Vergangenheit - wordplay that implies that the past is not really past and something is happening right now

- Title: Raubkunst, Dunkelmänner, Antikenschmuggel: imply something sinister is going on
- Subheadings "set the scene" geographically: Kabul, then Egypt and Iraq, finally Europe
- Geneva is mentioned
- Intro paragraph uses urgent, market-oriented language "rasante Zunahme", "Boom"

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- "Dunkelmänner" - invisible, inscrutable bad actors
- war and political unrest
- insufficient security at source - criminal energy in the marketplace

Which elements of moral panic are visible?

- urgency, implying *concern*

Which orientalist tropes are used to rouse concern among the audience?

- romanticising language: "basar"
- emphasis on no or too lax security at source
- "constant" war and political unrest as motive (before 2001!)

How is the *antiquities trafficking chain* constructed in this article?

- clear distinction between source and market countries
- Article takes steps from "far away" (Afghanistan) to "home" (Switzerland)
- tries to follow steps from source (Afghanistan, Egypt, Iraq), transit (Jordan, Pakistan, Switzerland), to market (UK, specifically, London)
- "basars" in Pakistan, Portobello Road Street Market in London, i.e. unregulated street markets
- clear distinction - but connection - between legal and illegal trade
- partly romanticised
- framed more like a natural phenomenon: e.g., antiquities "flow" from one place to another

Main Research Question:

How is "*Raubkunst - unvergangene Vergangenheit*" (Waser, 1997) framing the market for illicit Iraqi, Afghan, and other antiquities in terms of a moral panic in the late 1990s?

This is a report in the *Neue Zürcher Zeitung*, one of the most high-circulation daily newspapers in Switzerland, which is widely read in other German-speaking countries as well. It was published on April 15, 1997 and deals with the topic of antiquities trafficking worldwide. Some then-recent cases including the looting of Albanian museums, the Sevso hoard case, and the trial of Jonathan Tokeley-Parry are discussed as examples for the illicit trade, as well as looting in Afghanistan and Iraq.

It is notable that words for "art" (e. g. Kunst, Kunstgegenstände, Raubkunst) and "antiquities" (Antiken) are used interchangeably. This frames the cultural heritage of source countries essentially as art objects, a practice that is common in the rhetoric of antiquities dealers. The term "Raubkunst" can also be translated as "spoils of war" and is often found in discussions of Nazi-looted art, but also, e.g., of the Napoleonic wars. Issues such as archaeological context or cultural property rights of source countries are not discussed, as opposed to questions of legality. Essentially, the framing suggests that antiquities trafficking is bad, not because of the harm it does, but because it is illegal. The author makes a clear distinction between the "black market" and the legal antiquities trade. There is no discussion of a potential illicit grey area in between. Authenticators of stolen goods are even called "so-called experts", implying that they are no "real" academics. In this article, the people who benefit from the illegal trade are called "Dunkelmänner" or "Drahtzieher", which evokes elusive, invisible "bad actors" that cannot be traced. Dealers that have been implicated in antiquities trafficking, such as Tokeley-Parry, are called "middlemen" (Mittelsmänner). Tokeley-Perry, after being convicted, has been called a "crook" even by other antiquities dealers (Mackenzie & Yates, 2016a), which shows his "fall from grace" in the business. The conviction makes him an easy name to drop for a journalist without risking litigation.

Other words used here to describe the illicit antiquities trade and the actors in it evoke a romanticised image of "bounty hunters" (Beutejäger) on one end of the trafficking chain, and sophisticated "gentleman thieves" outsmarting the authorities on the other.

The problematic situation in the origin countries - including lack of security, economic hardship and armed conflict - is described almost in terms of a natural occurrence. The orientalist narrative of "constant war" is clearly visible here. Another framing device that is obviously orientalist is the trope of "lax security", implicitly laying the blame for looting on the origin countries. The word "Basar", meaning souq, where the author assumes looted Afghan cultural objects to be sold, is another orientalist trope. Notably, this image of unregulated street markets is taken up again later with the mention of the Portobello Street Market in London. Both frame the market with looted antiquities as an unregulated operation of small-time criminals, which stands in glaring contrast to the figures mentioned in the same article that looted antiquities can fetch in market countries.

While discussing the harm done by conflict, post-conflict, and crisis-related looting, the tone of the article is matter-of-fact, maintaining a journalistic distance from the subject matter without any calls to action or predictions for the future. There is an element of *concern* visible in the report, yet no other elements of moral panic following Goode and Ben-Yehuda (2009) can be clearly identified.

2 Title: Stein aus biblischer Zeit

Publication: Neue Zürcher Zeitung

Date: 27. October 2002

Author(s): Geneviève Lüscher

Search Term: Raubgrabung 1

Operational Research Questions:

Which words are used to describe *looting at source*?

- "in oder um Jerusalem herum gefunden worden" - very vague
- Raubgrabung

Which words are used to describe *the antiquities market and market actors*?

- "Antiquitätenhandel" = "Makel" (antiquities trade provenance is a "flaw")

Which words are used to describe *antiquities*?

- "israelische Steinkiste"

Which devices are used to get/keep the reader's attention?

- The biblical connection (Jesus' brother)

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Stein aus biblischer Zeit" (Lüscher, 2002) framing the market for illicit antiquities in terms of a moral panic in 2002?

This is a short piece about the case of a Jewish ossuary that surfaced on the Israeli antiquities market, whose Aramaic inscription has been interpreted as a contemporary proof for the existence of Jesus, but whose authenticity has been questioned (for more on this case see Brodie & Kersel, (2012)). It is noted that the unclear provenance is called a "flaw" in this respect (as authenticity can only be proven through archaeological context), but destruction caused by looting is not mentioned, nor is the questionable legality of the piece.

There is no indication of any concern, let alone a moral panic, about the loss of cultural heritage and archaeological knowledge. The article was published in the Swiss daily Neue Zürcher Zeitung.

3 Title: Afghanische Behoerden vereiteln Kunstmuggel in grossem Stil - Kulturgegenstände sichergestellt

Publication: AFP

Date: November 5, 2002

Author(s): AFP

Article Genre: agency report

Search Term: Antikenschmuggel 2

Operational Research Questions:

Which words are used to describe *looting at source*?

- "hunderte archäologische Stätten ausgeplündert" ("hundreds of archaeological sites plundered")
- "schwer bewaffneten Räuberbanden" - ("heavily armed looting gangs")
- Lokale Amtsträger und Kriegsherren stecken oft mit den Schmugglern unter einer Decke ("local authorities and warlords are often in bed with the smugglers")

Which words are used to describe *the antiquities market and market actors*?

- no mention

Which words are used to describe *antiquities*?

- "große Mengen antiker Kunstgegenstände" ("ancient art objects")
- "Kulturschätze" ("cultural treasures")
- monetary value ("150.000 Euro")
- "Kulturerbe" ("cultural heritage")
- "archäologischen Schätze des Landes" ("archaeological treasures" - again)
- Kunstschätze (and again)

Which devices are used to get/keep the reader's attention?

- mention of Bamiyan Buddhas

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- "Schmuggler" (smugglers)
- local warlords

Which elements of moral panic are visible?

- none

Which orientalist tropes are used to rouse concern among the audience?

- mention of Taliban negligence
- mention of corruption and complicity

How is the *antiquities trafficking chain* constructed in this article?

- not mentioned beyond "smugglers"

Main Research Question:

How is "Afghanische Behörden vereiteln Kunstschnuggel in grossem Stil - Kulturgegenstände sichergestellt" (AFP, 2002) framing the market for illicit Afghan antiquities in terms of a moral panic in November 2002?

This is a very short (194 words) agency report, reporting on a police bust of looted Afghan antiquities on their way out on the country. The report mentions that the problem of looting had been around in Afghanistan throughout the Taliban rule and armed conflict. While acknowledging that the problem exists, the outlook seems to be that the situation is better now than it was before - the opposite of reporting in a moral panic. There is no mention of the antiquities trafficking chain beyond the borders of Afghanistan, yet there is mention of corruption among local authorities, said to be involved in smuggling operations. Looting and smuggling of antiquities is framed as a local problem, rather than a transnational criminal enterprise. The antiquities are called "cultural heritage" (once), but more prominently "treasures" and "art objects" (three times each, incl. title).

2003

4 Title: Keine Identität ohne Geschichte

Publication: Neue Zürcher Zeitung

Date: 9. May 2003

Section: Feuilleton

Author(s): Georges Waser

Article Genre: Culture News

Search Term: Antikenschmuggel 3

Operational Research Questions:

Which words are used do describe *looting at source*?

- "Nachwehen des Golfkrieges" (again)
- "Not der irakischen Museen" (hardship of Iraqi museums)
- "Kenntnisreiche Plünderer" ("knowledgeable looters")
- "geplündert" (looted, plunderd)
- "a reaction to oppression" (quote, Ari Fleischer)

Which words are used do describe *the antiquities market and market actors*?

- Antikenschmuggel (antiquities smuggling)
- "Strom von Raubkunst" (a "flood of looted art")

- "Hochburgen des internationalen Antikenhandels" ("strongholds of the international antiquities market")

Which words are used to describe *antiquities*?

- "Kulturgut" (cultural property)
- "Raubkunst" (spoils of war/ looted art)
- "Antiken" (antiquities)
- "Altertümer" (antiquities)
- "sumerischen, babylonischen und assyrischen Kunstwerken" (works of art)
- das kulturelle Erbe nicht nur des Iraks, sondern der ganzen Menschheit (cultural heritage not only of Iraq, but all of humanity)
- sumerische und mesopotamische Altertümer ("Sumerian and Mesopotamian antiquities")
- Lose von zweifelhafter Herkunft ("lots of dubious origin")
- Unzählige Objekte hingegen, darunter die wertvollsten (objects graded by value, unclear whether cultural or monetary)

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- sanctions (before) and war (now)
- too little security (again)
- "Not der Bevölkerung" (poverty)
- lacking protection by the American soldiers? - implied

Which elements of moral panic are visible?

- concern about looting

Which orientalist tropes are used to rouse concern among the audience?

- "cultural heritage of all humanity"
- smuggling by donkey

How is the *antiquities trafficking chain* constructed in this article?

- Objects are "moving" on their own
- "Strom" – Objects "flood" the market

Main Research Question:

How is *Keine Identität ohne Geschichte* (Waser, 2003) framing the market for illicit Iraqi antiquities in terms of a moral panic in 2003?

This is a short culture news report about an exhibition of Iraqi antiquities, held in the British Museum in May 2003. It is clear that the exhibition was held in reaction to the looting of the Iraq Museum in April 2003, but the report also discusses looting under the sanctions imposed on Iraq

post-1991. It is notable that looted antiquities are framed as "cultural heritage" rather than "art" and the destruction of archaeological sites is also mentioned. The blame for the looting seems to be laid mostly at the door of the invasion force and the general situation in Iraq - not the market. Elements of moral panic are not prevalent here, except a concern about the destruction through looting.

5 Title: Hölle im Paradies

Publication: DIE WELT

Date: 30. May 2003

Section: Feuilleton

Author(s): Peter Dittmar

Article Genre: Kommentar

Search Term Antikenschmuggel 4

Operational Research Questions:

Which words are used to describe *looting at source*?

- "Schändung des Weltkulturerbes" - roughly: violation, e.g. destruction, but when applied to a person means rape. Possibly meant as hyperbole here (used unironically by others later).
- "Raubgräberei und Antikenschmuggel" (looting and trafficking)

Which words are used to describe *the antiquities market and market actors*?

- no mention

Which words are used to describe *antiquities*?

- "Weltkulturerbe im Irak" ("world heritage in Iraq")
- "nationale Erbe des Zweistromlandes" (sarcastically, "national heritage of Mesopotamia")

Which devices are used to get/keep the reader's attention?

- irony, sarcasm
- deliberately "highbrow", somewhat pretentious diction (sarcasm again)

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- evidently, the Iraqi subsistence looters
- possibly Saddam Hussein

Which elements of moral panic are visible?

- backlash to concern – backlash can also be part of moral panic

Which orientalist tropes are used?

- Iraq called "Mesopotamia"

How is the *antiquities trafficking chain* constructed in this article?

- it does not come up

Main Research Question:

How is "Hölle im Paradies" (Dittmar, 2003) framing the market for illicit Iraqi antiquities in terms of a moral panic in May 2003?

This is a short commentary on a conference about the loss of cultural heritage held in May 2003. The framing device used most prominently here is sarcasm, employed by the author to mock the conference attendees and their concern about the situation. While tacitly acknowledging that the situation of Iraqi heritage is problematic, the text derides explanations of subsistence digging and the apathy of the American military in the face of the looting at the Iraq Museum.

The author uses ridicule to question heritage professionals' competence to comment on current situations by saying that "archaeologists think in millenia, not days or months". The wording is deliberately pretentious, potentially to emphasise the conference attendees' detachedness. It is also implied that they are nostalgic for the regime of Saddam Hussein.

The dismissive tone of the commentary suggests that here, two moral panics might be at odds: The "War on Terror" vs. the concern about heritage - but generally, there is little evidence for a moral panic in this text. The problem of antiquities trafficking is only mentioned shortly as an aside.

2005-2007

6 Title: Wenn von der nackten Maja nur der Kopf bleibt

Publication: Stuttgarter Zeitung

Date: 31. May 2005

Section: KULTUR

Author(s): Dieter Kapff

Article Genre:

Search Term: Raubgrabung 2

Operational Research Questions:

Which words are used to describe *looting at source*?

- "Raubgräber vergreifen sich an fremden Schätzen" - (looters misappropriate or: "abuse" foreign treasures - language evocative of sexualised violence again)
- Museen geplündert (plundered)
- Scharen von Raubgräbern ("hordes" of looters)
- Kraterlandschaften an den Fundorten früher Hochkulturen ("crater landscapes at the sites of ancient high cultures")

- Kulturrraub und Raubgräberei (two words for looting)

Which words are used to describe *the antiquities market and market actors*?

- Handel mit illegalen Antiquitäten
- ausgebuddelt und verkauft ("dug out and sold")

Which words are used to describe *antiquities*?

- "Schätze" (treasures)
- Vergangenheit (past, title of the colloquium)
- "Antiquitäten"

Which devices are used to get/keep the reader's attention?

- Intro about Iraq, leading over to Germany

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- looters and dealers

Which elements of moral panic are visible?

- concern
- supposed rise in the problem: it's not as bad as in Iraq yet, but...
- "dritten Rang hinter dem Drogen- und dem Waffenhandel" - *disproportion*
- several millions - *disproportion*

Which orientalist tropes are used?

- local looters and subsistence diggers as "hordes" or "swarms" (evocative of "barbarian hordes" or potentially even locust swarms – dehumanising language)
- "early high cultures" as a hook to engage the German audience

How is the *antiquities trafficking chain* constructed in this article?

- no mention

Main Research Question:

How is "Wenn von der nackten Maja nur der Kopf bleibt" (Kapff, 2005) framing the market for illicit antiquities in terms of a moral panic in 2005?

The topic of this article is archaeological looting as a global problem, specifically with a German focus, but using the post-2003 looting in Iraq as a "hook". It is a report about a colloquium with the title "Who is stealing our past?" held in 2005, raising the problems of a rise in looting and metal-detecting. In terms of moral panic, there is a clear sense of concern about looting here, as the quoted archaeologists see a rise in looting and metal-detecting as well as illicit antiquities sales. The comparison to at the time war-torn Iraq is disproportionate, as are the figures mentioned ("millions") and the comparison with drug and arms trafficking (Yates & Brodie, 2023).

7 Title: Sumerischer Terracotta-Löwenkopf im Angebot

Publication: Neue Zürcher Zeitung

Date: 3. July 2005

Section: Ausland

Author(s): Christoph Plate

Article Genre: report

Search Term Raubgrabung 3

Operational Research Questions:

Which words are used to describe *looting at source*?

- Die Plünderung der Grabungsstätten (looting of archaeological dig sites)
- Plünderungen und Raubgrabungen (looting and plundering)

Which words are used to describe *the antiquities market and market actors*?

- Bei Auktionen werden Tausende Artefakte angeboten - zu sehr kommoden Preisen. ("thousands of artefacts are sold at auctions - at very accomodating/comfortable prices")
- Website des Online-Auktionshauses Ebay oder etwa beim Versandhaus Baghdad.Marketplace ("eBay or the mail-order company Baghdad.Marketplace")
- Händler (dealers)
- Schmuggler und Kunsthändler ("smugglers and art dealers")

Which words are used to describe *antiquities*?

- Artefakten (artefacts)
- irakische Antiquität (Iraqi antique)
- etwas richtig Altes aus Mesopotamien ("something really old from Mesopotamia")
- Antiquitäten aus dem Nahen Osten (Near Eastern antiques)
- im Irak gestohlenen Objekten
- irakischen Statuen aus Ton oder Stein, mit antiken Rollsiegeln und mit Schmuck ("Iraqi statues from clay or stone, ancient cylinder seals, and jewelry")

Which devices are used to get/keep the reader's attention?

- the internet as a market place (still new at the time)

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

Which orientalist tropes are used?

- Mesopotamia

How is the *antiquities trafficking chain* constructed in this article?

- through looting, there are many Iraqi pieces on the market: prices fall
- looted antiquities are sold on eBay and other online market platforms.

Main Research Question:

How is "Sumerischer Terracotta-Löwenkopf im Angebot" (Plate, 2005) framing the market for illicit antiquities in terms of a moral panic in 2005?

This piece is about the sale of illicit antiquities on the internet - a fairly new commodity in 2005. The focus lies on Iraqi antiquities and gives a "buyer beware" on the possibility of looted or fake artefacts sold online and describes the problems authorities face in policing this. It is noteworthy that antiquities are described as "Iraqi" several times, as opposed to "Mesopotamian", or some other vague terminology. The framing is less that of a moral panic, more of a background explanation piece on problems with buying Iraqi antiquities, especially on the internet.

8 Title: ARCHÄOLOGIE "Kein Handel mit Bodenfunden!"

Publication: Berliner Zeitung

Date: 22. October 2005

Section: POLITIK

Author(s): Martina Doering

Article Genre: Interview

Search Term Raubgrabung 4

Operational Research Questions:

Which words are used to describe *looting at source*?

- "Bodenfunde" - "ground finds"(?)
- Raubgrabungen (looting)
- Raubgrabungsfunde ("finds from looting")

Which words are used to describe *the antiquities market and market actors*?

- Handel und Nachfrage nach Antiken (trade and demand for antiquities)
- Handelsverbot für Hehlerware (trade ban for stolen goods)
- Händler und Käufer (dealers and buyers)

Which words are used to describe *antiquities*?

- Bodenfunde ("finds from the ground")
- Raubgrabungsfunde (finds from looting)
- Raubgut ("loot")

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- inadequate/no laws (in market countries)
- market actors

Which elements of moral panic are visible?

- concern
- call for a change in legislation

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

- demand fuels looting

Main Research Question:

How is "Kein Handel mit Bodenfunden!" (Doering, 2005) framing the market for illicit antiquities in terms of a moral panic in 2005?

This is an interview by Martina Doering with archaeologist Michael Müller-Karpe (the first of many to come), who points to the problem of selling looted objects by explaining the meaning of archaeological context. This is the first mention of a planned German cultural property protection law (adopted in 2007), which he dismisses as inadequate and demands a reverse burden of proof on dealers and buyers of antiquities as "a first step" to stem looting and trafficking of antiquities. The tone is matter-of-fact. While certainly identifying antiquities trafficking as a problem and calling for better laws to counter it, the framing does not exhibit any clear signs of a moral panic about cultural heritage. The title, however, is phrased rather urgently, to grab the readers' attention.

9 Title: Archäologie am Boden; Terror verhindert Ausgrabungen

Publication: Süddeutsche Zeitung

Date: 30. November 2005

Section: Themen des Tages

Author(s): Sonja Zekri

Article Genre: Report

Search Term Antikenschmuggel 5

Operational Research Questions:

Which words are used do describe *looting at source*?

- Raubgrabungen
- die seit dem Ende des Krieges die archäologischen Stätten verwüsten
- Zerstörung des kulturellen Erbes des Irak (destruction of Iraq's cultural heritage)

- Nacht für Nacht Jeeps oder Bulldozer anrollen (jeeps and bulldozers arriving every night)
- Zu Hunderten reißen Raubgräber Krater in den Boden, zerstören die zerbrechliche Lehmziegelarchitektur (hundreds of looters ripping craters into the ground, destroying the fragile mudbrick architecture)
- In den vergangenen zwei Jahren, so schätzen Experten, wurden dem Boden so viele Objekte entrisen wie in den 250 Jahren davor (objects "ripped from the ground")
- zerstört ... beschädigt ... vollständig vernichtet
- Viele Stätten werden nun einfach umgepflügt (sites being "trenched" or "ploughed up")

Which words are used to describe *the antiquities market and market actors*

- einen milliarden schweren Schwarzmarkt im Westen (black market in the "West")
- derzeit eine besonders unrühmliche Rolle (Germany playing an "ignoble/inglorious" role)

Which words are used to describe *antiquities*?

- Keilschrifttafeln, Rollsiegel, Terracotten (cuneiform tablets, cylinder seals, terracotta figurines)
- Objekte
- Antiken

Which devices are used to get/keep the reader's attention?

- namedrop of Susanne Osthoff (person of interest at the time)
- Saddam intro (then/now comparison)
- Terror in the title (only mentioned briefly)
- mentions Gilgamesh and the flood (Biblical connection)

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- basically the war
- "jeeps or bulldozers" (rather than persons)
- "black market in the West"

Which elements of moral panic are visible?

- concern (strong)
- implicit call for new laws

Which orientalist tropes are used to rouse concern among the audience?

- 5000jährige Geschichte (5000 years of history)
- Saddam the history aficionado as Nebuchadnezzar
- terror
- Biblical connections

How is the *antiquities trafficking chain* constructed in this article?

- war leads to looting, buyers are in "the West"

Main Research Question:

How is the report "Archäologie am Boden" (Zekri, 2005b) framing the market for illicit Iraqi antiquities in terms of a moral panic in 2005?

This is a very short report on the looting and trafficking of antiquities in Iraq. It describes in graphic terms the looting of Iraqi archaeological sites, using high numbers (10,000 sites, 5,000 yr history). It refers several times to Susanne Osthoff, a German archaeologist who was held hostage by terrorists in Iraq for a while before her release. The destruction is blamed mainly on the "black market" in "the West" without referring to actual persons. The report concludes with the remark that Germany has no law against the sale of looted material. There are elements of a beginning moral panic to be seen in the framing of this article, especially the concern, and the call for stricter regulation. The mention of "terror" in the title seems to refer more to the general situation of conflict than actual terrorism, and is an early sign of the later preferred way to catch readers' attention.

10 Title: Der Hehlerstaat; Deutschland ist ein Umschlagplatz für Kunst aus Raubgrabungen

Publication: Süddeutsche Zeitung

Date: 1. December 2005

Section: FEUILLETON

Author(s): Sonja Zekri

Article Genre:

Search Term Raubgrabung 5

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgräber

Which words are used to describe *the antiquities market and market actors*?

- Antiken-Markt ist hungrig, und er zahlt hervorragend (antiquities market being "hungry" and paying highly)
- auf Auktionen oder im Internet auftauchen (objects "surfacing" at auctions or on the internet)
- Antikenaufkauf

Which words are used to describe *antiquities*?

- Kunst aus Raubgrabungen ("art" from looting)

- Artefakte
- Stücke ("pieces")
- mesopotamischen Erbes ("Mesopotamian heritage")
- Kulturgütern (cultural goods)

Which devices are used to get/keep the reader's attention?

- the internet
- Americans
- Osthoff

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- "hungry" antiquities market
- also Germany (because the laws and not ratifying the UNESCO convention)
- Hehlerstaat, der Gewinn aus dem Unglück des Irak zieht (German being a country of "fences" that profits from Iraq's suffering)

Which elements of moral panic are visible?

- law criticism
- hostility (the word "fence" implying criminality)

Which orientalist tropes are used?

- kultivierten Arabern ("civilised Arabs")
- Mesopotamia

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Der Hehlerstaat" (Zekri, 2005a) framing the market for illicit antiquities in terms of a moral panic in 2005?

This piece deals directly with antiquities trafficking, which at that time was not prohibited by any specific laws in Germany. It enters with a description of the situation in Iraq, but then leads over to criticising the fact that Germany had not yet ratified the 1970 UNESCO convention. Michael Müller-Karpe is quoted (in the title, even), and there is a reference to Susanne Osthoff. The values called upon are less concern about cultural heritage (even though heritage destruction and loss in Iraq is lamented), but more about Germany's reputation, lest it become known as a "fence country, which profits from Iraq's suffering". Note that the antiquities market is called "hungry".

11 Title: "Museen vernichten die Geschichte unserer Erde"

Publication: Welt am Sonntag

Date: 29. January 2006

Section: KULTUR

Author(s): Stefan Koldehoff

Article Genre: Interview

Search Term Raubgrabung 6

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabung
- Zerstörung der Grabungsstätten und damit der antiken Kulturen (destruction of archaeological sites and with them, the ancient cultures)
- Ich habe jahrelang im Nahen Osten gearbeitet und die zerstörten Grabungsstätten gesehen: Löcher von Dynamitsprengungen, Absperrpfosten, Bulldozer ("I have worked in the Middle East and seen the destroyed archaeological sites" - Muscarella)

Which words are used to describe *the antiquities market and market actors*?

- der illegale Ankauf von antiken Kunstwerken - durch Privatsammler wie durch Museen - "illegal purchase of antiquities, be it by private collectors or museums"
- Ankaufspraktiken ("purchase practices")
- illegal außer Landes gebrachten antiken Kunstwerken ("illegally exported ancient art")
- kulturelles Verbrechen ("cultural crime")

Which words are used to describe *antiquities*?

- antike Kunstwerke ("ancient art")
- "antiken Altertümern" - das Codewort für gestohlene Kunstwerke (Muscarella)
- römischen, griechischen oder anderen Antiken

Which devices are used to get/keep the reader's attention?

- The subtitle "Alles nur geklaut" (is the title of a popular song from the 1990s)
- personal accounts

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- museums, partly
- buyers who do not do their due diligence more generally

Which elements of moral panic are visible?

- concern
- hostility

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Museen vernichten die Geschichte unserer Erde" (Koldehoff, 2006) framing the market for illicit antiquities in terms of a moral panic in 2006?

This is an interview with archaeologist Oscar White Muscarella about the Marion True trial and museum acquisition ethics. He notes that "museums (which buy antiquities) are part of the destruction of culture". There is a sense of concern for cultural heritage here, as well as *hostility* towards some museum employees who defend buying antiquities. The words used for antiquities here are generally from the realm of "art" and "artworks".

12 Title: Die Hehler werden sich freuen; Zahnlos: Deutschland will Handel mit Raubkunst verbieten

Publication: Süddeutsche Zeitung

Date: 18. February 2006

Section: FEUILLETON

Author(s): Michael Müller-Karpe

Article Genre: commentary/op-ed

Search Term Raubgrabung 7

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabungen
- beispiellosen Vernichtung des archäologischen Erbes der Menschheit ("incomparable devastation of the archaeological heritage of humanity")

Which words are used to describe *the antiquities market and market actors*?

- zur Versorgung eines nimmersatten Antikenmarktes mit Hehlerware ("to provide an insatiable antiquities market with stolen goods")
- Antikenhandel
- auch "seriöse" Händler ihre Hehlerware unter der Theke hervorholen und mit gutem Gewissen verkaufen - ("*respectable* dealers can sell stolen goods above counter with a clear conscience" - sarcasm)

Which words are used to describe *antiquities*?

- Hehlerware ("stolen goods")
- geraubtem Kulturgut ("looted cultural goods")
- Objekte

- Diebesgut ("stolen goods" again)
- "Schmuddelobjekte" - "dirty objects"
- provenienzlosen Funden aus Raubgrabungen ("unprovenanced finds from looting")
- undokumentierte Raubgrabungsfunde ("undocumented finds from looting")

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- the "insatiable" market
- ineffective, lit. "toothless", legislation (by incompetent or too market-friendly politicians)

Which elements of moral panic are visible?

- concern
- hostility
- complaints about ineffective laws (i.e. calls for action)
- "mehr Objekte durch Raubgräber dem Boden entrissen wurden, als in den vergangenen 200 Jahren bei ordnungsgemäß dokumentierten Grabungen zu Tage kamen" - more objects from recent looting than from excavations of 200 years - disproportion?
- six billion - disproportion

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Die Hehler werden sich freuen" (Müller-Karpe, 2006) framing the market for illicit antiquities in terms of a moral panic in 2006?

This is an op-ed written by Michael Müller-Karpe about Germany's first cultural property protection law and ratification of the 1970 UNESCO convention. The words the archaeologist uses for antiquities are either, expectably, along the lines of cultural heritage, or emphasise the illicit nature of unprovenanced artefacts, most notably here is the neologism "Schmuddelobjekte" - roughly: "dirty objects". Market actors are often termed "fences" and at one point, Müller-Karpe ironically writes "now, even 'respectable' dealers can lift their stolen goods from below the counter". This shows a general disdain for antiquities dealers (i.e., *hostility*). The antiquities market as a whole is described as "insatiable". There is once more the call for a reverse onus of proof on sellers and buyers of antiquities, and finally, for a ban on buying and selling antiquities altogether.

13 Title: Kunstraub und Kunstkauf; Es bleibt die Einzelfallprüfung

Publication: Süddeutsche Zeitung

Date: 19. June 2006

Section: FEUILLETON

Author(s): Günther Schauerte

Article Genre: background longread

Search Term Raubgrabung 8

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabungen und Plünderungen im Irak ("looting and plundering in Iraq")
- Raubgrabung oder Diebstahl ("looting or theft")

Which words are used to describe *the antiquities market and market actors*?

- Begehrlichkeiten des Kunstmarktes und der Sammler ("desires of the art market and collectors")

Which words are used to describe *antiquities*?

- Hehlerware ("stolen goods")
- Kulturgut ("cultural property")
- Kulturgüter ("cultural goods")
- kulturellen Erbes ("cultural heritage")
- Objekte
- archäologische Objekte
- archäologischen Objekten mit unklarer Provenienz ("archaeological objects of unclear provenance")
- Kulturschätzen ("cultural treasures")

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Kunstraub und Kunstkauf" (Schauerte, 2006) framing the market for illicit antiquities in terms of a moral panic in 2006?

This piece deals with the ratification of the UNESCO convention again, after a panel in Berlin titled "Germany – a paradise for stolen goods?". Notably, the author calls those archaeologists who criticised the draft legislation as too soft "hardliners". The larger part of the article is a background

on the history of excavation and a deliberation on the restitution of cultural goods such as the bust of Nefertiti. There is little evidence for moral panic, but it could arguably be seen as a reaction to a perceived overreaction to a problem, which also forms part of the early stages of moral panic. Notably, the title calls antiquities "art" while the main text uses terms of "cultural property", but also still uses the old trope of "treasure".

14 Title: Der Ton der Händler-Lobby; Das Gesetz zum Kulturgüterschutz fördert Raubgrabungen, sagt der Archäologe Michael Müller-Karpe

Publication: Berliner Zeitung

Date: 1. Februar 2007

Section: Feuilleton

Author(s): Martina Doering

Article Genre: Interview

Search Term Antikenhehlerei 1

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabungen
- "Raubgrabungsförderungsgesetz" - ("law for the promotion of looting" sarcasm)
- "das Graben nach vorislamischen Antiken" MMK, quoting an alleged fatwa by a radical Imam

Which words are used to describe *the antiquities market and market actors*?

- "Händler-Lobby" (dealer lobby, Title)
- "Verhökern" - sell off, flog sth. (derogatory, author)
- Hehler (fences, MMK)
- "Einfluss einer finanzkräftigen Antiken-Händlerlobby" (influence of a financially powerful lobby of antiquities dealers MMK)

Which words are used to describe *antiquities*?

- Kulturgüter
- Fundstücken ("finds")
- Objekte aus Nicht-EU-Staaten
- Kulturgut illegaler Herkunft

Which devices are used to get/keep the reader's attention?

- terrorists

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- bad law/the state influenced by a wealthy lobby of antiquities dealers:
"Raubgrabungsförderungsgesetz" (law for the promotion of looting, MMK)
- idle authorities
- lawmakers not listening to archaeologists

Which elements of moral panic are visible?

- "verheerende Konsequenzen" (concern)
- Hehler, Händler-Lobby -> hostility
- hope for a better law in Europe: German law "unacceptable" (MMK)
- 6 to 8 billion dollar -> disproportion

Which orientalist tropes are used?

- terrorists

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Der Ton der Händler-Lobby" (Doering, 2007) framing the market for illicit antiquities in terms of a moral panic in 2007?

This is an interview about Germany's first cultural protection and restitution law that was passed shortly after ratification of the UNESCO convention in 2007, and widely criticized by archaeologists and antiquities crime experts, the most famous being the interviewee Michael Müller-Karpe. The tone in which the law is described both by the author and her interview partner is quite sarcastic, in Müller-Karpe's case with a hint of frustration. There is a clear sense of concern about the fallacies and loopholes of the law, as well as a sense of hostility towards dealers by Müller-Karpe. There are also mentions of later "fan favourites", such as the billion-dollar business of looted antiquities and the supposed looting by terrorists to finance their terror. The latter was suggested by the interviewer.

15 Title: Gold im Staub

Publication: Der Tagesspiegel

Date: 25. November 2007

Section: Seite 3

Author(s): Wolfgang Bauer

Article Genre: Reportage

Search Term Antikenschmuggel 6

Operational Research Questions:

Which words are used to describe *looting at source*?

- "wühlt", "gräbt", aufgestemmt - mainly words to the effect of "digging"
- "Aus der Luft wirkt das Land wie aufgeplatzt." - the land looks split open
- "Plünderer"

Which words are used to describe *the antiquities market and market actors*?

- "Hehler" - fences (antiquities dealers) that sell to private collectors
- Ebay
- Hunderte Anbieter überbieten sich im Anpreisen von Angeboten
- looting to order
- disproportionate figures (32 Million dollars)

Which words are used to describe *antiquities*?

- "Scherben in Massen[...], prachtvoll bemalt, in allen Farben, mit rätselhaften Schriftzügen und Symbolen" ("masses of sherds, painted in splendid colours, with mysterious scripts and symbols")
- Rohstoff - resource
- "Überresten der antiken Zivilisation" - remains of ancient civilisations
- connection with opium and weapons transports
- "Die Hehler sitzen in Pakistan, Thailand, Holland, den USA und Großbritannien" (dealers in Pakistan, Thailand, the Netherlands, US and UK - but not Germany?)

Which devices are used to get/keep the reader's attention?

- graphic, poetic descriptions - dust as "the flesh of the dead" etc.
- emotional language
- painting pictures with words

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- the subsistence diggers (to a lesser extent) - "Bewohner dreier Nachbardörfer"
- disrupted public order
- apathy by aid organisations, ISAF forces, local authorities
- foreign (Dutch) troops? (implied)
- too little market regulation (UNESCO convention only just ratified in Germany)
- Globalisation

Which elements of moral panic are visible?

- call for better regulation
- warning of complete destruction (direct quote) – concern

- blown up figures (32 Million dollars) – disproportion

Which orientalist tropes are used to rouse concern among the audience?

- "together with his son and his cousin"
- "intelligent blue eyes" - the blue eyes being a sign of intelligence?
- "mysterious inscriptions"
- descriptions of heat, dust, etc...
- carpet merchants

How is the *antiquities trafficking chain* constructed in this article?

- a global market, brought about by inequality
- war/poverty forces subsistence diggers to looting

Main Research Question:

How is the report "*Gold im Staub*" (Bauer, 2007) framing the market for illicit Afghan antiquities in terms of a moral panic in 2007?

This report follows the activities of three local subsistence diggers in Balkh, Afghanistan, in 2007. The language used in the opening paragraph is dramatic and descriptive, evoking a vivid picture of a hot and dry, "oriental" climate, and hard, desperate, but ultimately futile work.

The words are used to evoke a lot of empathy for the diggers and Afghanistan in general. The problem of lost antiquities is attributed to a global smuggling market and economic inequality. The context of war is mentioned only as an aside, but the role of Germany as a market country is mentioned.

There is a sense of moral panic in the prediction that Afghanistan's past will be "lost within 5 years" and the author also laments the apathy of the "powers that be" (like occupying forces and international aid organisations) and the lack of regulation on the international market. There are some highly disproportionate figures given for the money smuggled antiquities supposedly make.

16 Title: Verkauf einer irakischen Schrifttafel im Internet gestoppt Erstmalige Zusammenarbeit von BAK, Bundespolizei und eBay (Neu: ganze Meldung)

Publication: SDA Basisdienst (Schweizerische Depeschen-Agentur)

Date: 18. December 2007

Section:

Author(s): KW

Article Genre: Agency News

Search Term Raubgrabung 9

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabung

Which words are used to describe *the antiquities market and market actors*?

- Handel mit irakischen Kulturgütern ("trade in Iraqi cultural goods")
- den in Zürich wohnhaften Verkäufer ("a seller resident in Zürich" neutral)
- illegale Auktion

Which words are used to describe *antiquities*?

- Keilschrifttafel aus dem Irak
- mesopotamische Keilschrifttafel - Mesopotamia!

Which devices are used to get/keep the reader's attention?

- internet

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

Which orientalist tropes are used?

- Mesopotamia

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Verkauf einer irakischen Schrifttafel im Internet gestoppt" (SDA, 2007) framing the market for illicit antiquities in terms of a moral panic in 2007?

This is the short news about the seizure of a cuneiform tablet sold on eBay by a resident of Zürich, Switzerland. The framing of this short news piece suggests a great policing success, due to the crackdown being enabled by a collaboration between Swiss federal and local as well as German federal police forces after the sale had been flagged by an expert in Germany. There is a sense of novelty, which is understandable as the sale of looted Iraqi goods on the internet was still a relatively new phenomenon at the time. Apart from this, the piece is kept rather neutral, probably also due to the format of the agency report. There is no evidence of moral panic.

2009-2011

17 Title: Goldgefäß - Zoll hofft auf "Konsens"

Publication: Idsteiner Zeitung

Date: 1. July

Section: KULTUR

Author(s):

Article Genre: short report

Search Term Raubgrabung 10

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabung

Which words are used to describe *the antiquities market and market actors*?

- Händler

Which words are used to describe *antiquities*?

- Goldgefäß ("gold vessel")

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Goldgefäß – Zoll hofft auf 'Konsens'" ("Goldgefäß - Zoll Hofft Auf "Konsens", 2009) framing the market for illicit antiquities in terms of a moral panic in 2009?

This is a short report in a local newspaper about the case of a small gold vessel that had been sold at an auction in Munich in 2005, then seized by German customs officials on the suspicion that it had been looted and trafficked from Iraq. The vessel was held in the Römisch-Germanisches Zentralmuseum in Mainz by Michael Müller-Karpe for further research, however, the auction house sued for the artefact's release. This report announces the judgement in this issue. There is little evidence of moral panic here and the tone stays carefully neutral. However, there are several articles about this case in local newspapers in the area around Mainz.

18 Title: Deutsch-irakischer Tanz ums goldene Gefäß

Publication: Stuttgarter Zeitung

Date: 6. July 2009

Section: SEITE 3

Author(s): Simone Gaul

Article Genre:

Search Term Antikenhehlerei 2

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabungen und Antikenhehlerei
- Grabräuber
- Und solange der Markt für illegale Artefakte nicht unterbunden werde, würde der Boden im Irak munter weiter durchwühlt

Which words are used to describe *the antiquities market and market actors*?

- Auktionshaus
- Sammler
- Müller-Karpe schätzt den Sammlerwert hingegen auf einen Millionenbetrag. "Eventuell im zweistelligen Bereich." (estimated collectors value in the millions "possibly a double-digit million amount" - MMK)
- Artefakt aus der Beute von Grabräubern ("an artefact from the booty of looters")
- Hehlerei (fencing)
- Illegaler Antikenhandel sei organisierte Kriminalität (antiquities trafficking as organised crime)

Which words are used to describe *antiquities*?

- zwischen antiken Ton- und Steingefäßen
- Deklariert war es als provinzial-römische Miniatur (it was declared as "provincial Roman" - i.e. European/German - miniature)
- Gefäß ("vessel")
- "Doppelblechröhrenhenkelattachen" - word of the day (archaeological term for the vessel's tiny handle mounts) - the author tries to be exact and scientific.
- Raubkunst

Which devices are used to get/keep the reader's attention?

- organised crime
- rarity (Weltweit existieren acht Goldgefäße aus der Sumererzeit. Dieses wäre das neunte.)

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

- concern
- hostility

Which orientalist tropes are used?

- "orientkunst"

How is the *antiquities trafficking chain* constructed in this article?

- after the fall of Saddam, looting occurred, and is ongoing as long as there is demand
- as soon as market actors "get their hands on" an artefact, it "vanishes" (MMK)
- antiquities smuggling is organised crime

Main Research Question:

How is "Deutsch-irakischer Tanz ums goldene Gefäß" (Gaul, 2009) framing the market for illicit Iraqi antiquities in terms of a moral panic in 2009?

This is another article in the series about one case of restitution of a small gold vessel from Germany to Iraq, which was brought to public attention by archaeologist Michael Müller-Karpe. The introductory wording is heavily loaded with (more or less made-up) terms like "Sumererzeit" ("the time of the Sumerians" – note that the vessel was identified as Old Babylonian) and "Orientkunst" ("art of the Orient"), apparently to "set the scene" for a text that deals with Western Asian archaeology. In the following, the author seems to try to stay with an archaeologically exact wording, almost as if writing for the science section: The STUTTGARTER ZEITUNG is the only daily German newspaper with a regular science section, but this text appeared closer to the front, on page 3 – maybe for reasons of political relevance?

The article describes the beginning of a legal battle between the German auction house that sold the vessel, and the Iraqi state. Müller-Karpe was the person who flagged the sale in the first place. His tone in quotes is concerned, while the article itself stays carefully neutral.

19 Title: Bis er bricht; Ein 4.500 Jahre alter Goldkrug hat einen Streit zwischen Zoll, Museum und dem Irak entfacht

Publication: Taz

Date: 7. July

Section: TAZZWEI

Author(s): HEIDE PLATEN

Article Genre:

Search Term Raubgrabung 11

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabung im Irak

Which words are used to describe *the antiquities market and market actors*?

- Antikenhandel ("antiquities trade")
- Auktionshaus Hirsch Nachfolger aus München (name of the auction house)

- illegalen Kunsthandel ("illegal art trade")

Which words are used to describe *antiquities*?

- Goldgefäß
- Schatz, winzig klein und goldglänzend (tiny, golden treasure)
- aus der Kultur der Sumerer ("from the culture of the Sumerians" - well, almost. The vessel was classified as Old Babylonian. Do Sumerians have a higher recognition factor?)
- Kleinod ("gem/treasure")
- wertvolles Kulturgut ("valuable cultural good" - MMK)

Which devices are used to get/keep the reader's attention?

- dramatic feature intro

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- too lax legislation

Which elements of moral panic are visible?

- Unterschlagung, Diebstahl, Hehlerei - hostility?
- Präzedenzfall gegen die laxe deutsche Gesetzgebung beim Antikenhandel

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Bis er bricht" (Platen, 2009) framing the market for illicit Iraqi antiquities in terms of a moral panic in 2009?

This is also an article about the case of the little gold vessel, but far more dramatic in tone and using quite flowery language. Except in quotes, the words used for the vessel are "treasure" and synonyms. The piece describes, quite captivatingly, how Müller-Karpe resisted the court order to hand over the vessel in his care at the museum to the Munich auction house which had sued for its release. The article stays relatively neutral on the case, while quoting Müller-Karpe's reasons and trying to illuminate the legal situation of the case, as well as the reasoning of the auction house. It is clear, however, that the reader is meant to sympathise with the archaeologist. There is little evidence of moral panic as such to be seen here, but there is a discussion of the lack of effective laws against antiquities trafficking in Germany.

20 Title: Goldgefäß - Museumsbrief an Steinmeier

Publication: Idsteiner Zeitung

Date: 7. July 2009

Section: KULTUR

Author(s):

Article Genre:

Search Term Raubgrabung 12

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabung

Which words are used to describe *the antiquities market and market actors*?

- Auktionshaus

Which words are used to describe *antiquities*?

- Goldgefäß
- Fläschchen

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

- concern

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Goldgefäß - Museumsbrief an Steinmeier" ('Goldgefäß - Museumsbrief an Steinmeier', 2009) framing the market for illicit antiquities in terms of a moral panic in 2009?

This is a follow-up on the gold-jar case in the local news. The tone is rather neutral, but the quotes (Michael Müller-Karpe) carry some urgency, especially with concern for Germany's reputation.

21 Title: Finanzgericht: Goldgefäß aus dem Irak

Publication: Idsteiner Zeitung

Date: 29. September 2009

Section: KULTUR

Author(s):

Article Genre: short news

Search Term Raubgrabung 13

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabung im Irak ("looting in Iraq")

Which words are used to describe *the antiquities market and market actors*?

- Auktionshaus ("auction house")

Which words are used to describe *antiquities*?

- historischen Goldvase ("historic gold vessel")
- irakisches Kulturgut ("Iraqi cultural heritage")
- strittigen Objekts ("disputed object")
- Kleinods ("gem", "little treasure" - again)

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Finanzgericht: Goldgefäß aus dem Irak" ('Finanzgericht: Goldgefäß Aus Dem Irak', 2009) framing the market for illicit antiquities in terms of a moral panic in 2009?

This is another follow-up on the gold vessel case, which reports the judgment of the Munich financial court that the artefact is in fact Iraqi cultural property and as such, had been rightfully seized by authorities. The language used does not carry any signs of moral panic.

22 Title: Ein Verbrechen gegen die Menschheit

Publication: Berliner Zeitung

Date: 7. October 2009

Section: FEUILLETON

Author(s): Martina Doering

Article Genre: Interview

Search Term Raubgrabung 14

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabungen im Irak ("looting in Iraq")
- "Diese Ausgrabungen sind nicht nur kriminell und schaden dem Irak, der um seine Schätze gebracht wird. Sie sind ein Verbrechen gegen die Menschheit," ("these excavations are not

only criminal and damaging to Iraq, which is deprived of its treasures, they are a crime against humanity." - Hashemy)

- "diese Grabungen" ("these digs")
- gefunden und aus dem Land geschmuggelt ("found and smuggled abroad")
- Plünderung des Museums in Bagdad 2003 (references looting of the Iraq Museum)

Which words are used to describe *the antiquities market and market actors*?

- Kauf und Verkauf geraubter Kunstgegenstände ("buying and selling looted art")
- illegalen Kunsthandels ("illegal art trade")
- Das Auktionshaus und der neue Besitzer
- "Der Handel mit solchen Funden fördert diese Grabungen" (demand fuels looting)
- illegalen internationalen Kunstmarkt
- dubiosen Geschäfte ("shady deals")

Which words are used to describe *antiquities*?

- Goldtopf ("gold pot")
- geraubter Kunstgegenstände ("looted art objects")
- geraubten Kunstschatze ("looted art treasures")
- illegalem irakischem Kulturgut (Hashemy)
- Objekt
- Artefakte
- geraubte und sichergestellte irakische Kulturgüter ("looted and seized Iraqi cultural goods")

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- bad laws in Germany
- demand for looted antiquities

Which elements of moral panic are visible?

- concern

Which orientalist tropes are used?

- Wurzeln der Zivilisation ("roots of civilisation")

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Ein Verbrechen gegen die Menschheit" (Doering, 2009) framing the market for illicit antiquities in terms of a moral panic in 2009?

This is an interview with Alaa al-Hashemy, then Iraqi ambassador to Germany, about the case of the small gold vessel and comparable cases like Shulgi's axe head. Al-Hashemy warns that looting is "a crime against all of humanity".

The words used have some urgency, and display concern for cultural heritage. He also warns that Germany might have become a hub for the illicit trade in cultural objects, which also speaks of concern. Notably, the newspaper uses more words from the range of "art objects" or "treasure" for the looted antiquities, while Hashemy uses more synonyms of "cultural heritage".

23 Title: Auferstanden aus Tresoren

Publication: Focus Magazine

Date: 14. June 2010

Section: Forschung und Technik

Author(s): Gudrun Meyer

Article Genre: magazine article/report

Search Term Antikenschmuggel 7

Operational Research Questions:

Which words are used to describe *looting at source*?

- "Krieg und Terror" ("war and terror" as threat to the artefacts)
- "Plünderungen der Mudschaheddin" ("looting by the mujaheddin")

Which words are used to describe *the antiquities market and market actors*?

- "Die radikalislamistischen Bilderstürmer hätten die Kunstwerke wohl verhökert." (about the Taliban) - author speculates that the Taliban might have sold the items.
- "Vieles fand seinen Weg zu ausländischen Sammlern, der Antikenschmuggel blüht in Afghanistan bis heute" - these two sentences seem to contradict each other: is this an Afghanistan problem or an international problem?

Which words are used to describe *antiquities*?

- "Objekte" - objects
- "antike Preziosen" - ancient treasures
- "spektakulärer Schatz" - amazing treasure
- Artefakte
- Schätze ("treasures")

Which devices are used to get/keep the reader's attention?

- Tutanchamun comparison
- reference to Bamyian Buddhas

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- the Taliban?
- Mujaheddin
- war and terror

Which elements of moral panic are visible?

Which orientalist tropes are used to rouse concern among the audience?

- words like "verhökert" ("sold", "flogged off" but in a derogatory way) might evoke images of "the basar" (as discussed before)
- images of a multi-cultural past as opposed to Islamic fundamentalism today

How is the *antiquities trafficking chain* constructed in this article?

- Objects "found their way" into private collections, once again moving on their own.

Main Research Question:

How is "Auferstanden aus Tresoren" (Meyer, 2010) framing the market for illicit Afghan antiquities in terms of a moral panic in 2010?

This is an article about an exhibition of gold items, which were unearthed in a regular excavation in Tilya Tepe, Afghanistan, in 1978. The piece announces the touring exhibition's stop at Bonn in 2010. Descriptions are heavy with various synonyms of "treasure" in reference to the objects. The author only touches lightly on the problem of antiquities looting in Afghanistan, already before Taliban regime, which, however, did not affect the objects of Tilya Tepe. There is little evidence of moral panic here, merely the laconic remark that antiquities trafficking "flourishes" in (or rather out of) Afghanistan. In fact, the article is more reminiscent in tone of the one from 1997 (Waser, 1997b), which used an almost romanticising language to describe looting in Afghanistan. At the very least, the same or similar orientalist tropes are used here as well.

24 Title: Keilschriftnachricht vom Klapperstorch; Eine 3000 Jahre alte Königsinschrift aus Raubgrabung wird an den Irak zurückgegeben

Publication: Süddeutsche Zeitung

Date: 4. January 2011

Section: Feuilleton

Author(s): Michael Müller-Karpe

Article Genre:

Search Term Raubgrabung 15

Operational Research Questions:

Which words are used to describe *looting at source*?

- verheerenden Plünderungen ("devastating acts of looting")
- brutal herausgebrochen, in transportable Einzelteile zerschlagen und außer Landes geschmuggelt ("brutally broken out, smashed into transportable pieces, and smuggled abroad")
- Raubgrabungen sind ein weltweiter Fluch (looting as a "global curse")

Which words are used to describe *the antiquities market and market actors*?

- Münchner Auktionshauses Gerhard Hirsch Nachfolger (these guys again)
- Antikenhehlerei ("antiquities fencing")
- New Yorker Antikenhändler
- Schmuggleroute mesopotamischer Antiken zu den Absatzmärkten im Westen ("smuggling route of Mesopotamian antiquities to the Western sales markets")
- "verzichtete" - quotes: sarcasm

Which words are used to describe *antiquities*?

- fast 3000 Jahre alten steinernen Keilschrifttafel ("almost 3000 year old stone cuneiform tablet" - age)
- Das antike Stück ("the ancient piece")
- irakischen Antiken ("Iraqi antiquities")
- irakisches Kulturgut ("Iraqi cultural property")
- mesopotamischer Antiken ("Mesopotamian antiquities")

Which devices are used to get/keep the reader's attention?

- graphic descriptions of looting

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- antiquities dealers

Which elements of moral panic are visible?

- hostility
- call for better laws

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

- looters take advantage of political unrest in North Iraq,
- break up Assyrian palace reliefs into smaller parts,
- smuggled through Mardin (Southeast Turkey)
- sold in New York

- bought by auction house in Munich.

Main Research Question:

How is "Keilschriftnachricht vom Klapperstorch" (Müller-Karpe, 2011b) framing the market for illicit antiquities in terms of a moral panic in 2011?

This is a guest article written by archaeologist Michael Müller-Karpe about the restitution of an Assyrian relief plate inscribed with cuneiform to the Iraqi ambassador in 2011 (still Hashemy?).

This case, described as "kurioser deutsch-irakischer Archäologenkrimi" a "bizarre Iraqi-German archaeologist true crime story" again involves the auction House Hirsch Nachfolger as well as Gorny & Mosch (both seated in Munich, which is probably the reason Munich-based SZ chose to run this story). Müller-Karpe explains the case and how the piece was identified as coming from Northern Iraq (it is made of Mosul marble and bears an inscription by Ashurnasirpal II.).

The tone is much calmer than most other articles on the topic of antiquities trafficking, including the quotes by Müller-Karpe chosen by professional journalists. In the last paragraph, Müller-Karpe opens the view to looting and antiquities trafficking as a global problem ("curse") fueled by "an insatiable antiquities market". The latter again shows a certain hostility. The graphic description of looting and the call for better laws to curb the illicit trade, are certainly meant to rouse concern among the audience.

25 Title: Raubkunst: Waffenlieferung in den Irak

Publication: WELTKompakt

Date: 10. February 2011

Section: KULTUR / Kultur Kompakt

Author(s):

Article Genre: short news

Search Term Antikenhehlerei 3

Operational Research Questions:

Which words are used to describe *looting at source*?

Which words are used to describe *the antiquities market and market actors*?

- Antikenhehlerei

Which words are used to describe *antiquities*?

- Raubkunst ("looted art" or "spoils of war")

Which devices are used to get/keep the reader's attention?

- "Waffenlieferung in den Irak" (humour/irony)

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Raubkunst: Waffenlieferung in den Irak" ('Kultur Kompakt', 2011) framing the market for illicit antiquities in terms of a moral panic in 2011?

This is a short culture section note on the restitution of a 3rd millennium BC axe-head to Iraq. There is a quote by Michel Müller-Karpe saying "antiquities smuggling is no trivial offence, it is a crime". The heading "Waffenlieferung in den Irak": weapons delivery to Iraq is quite tongue-in-cheek. The legal proceedings that led to the restitution of the artefact are described as "Tauziehen" = "tug of war", implying a long back-and-forth.

26 Title: Raubbau am Gedächtnis der Menschheit

Publication: Idsteiner Zeitung

Date: 18. June 2011

Section: REGION

Author(s): Frank Schmidt-Wyk

Article Genre: announcement

Search Term Antikenhehlerei 4

Operational Research Questions:

Which words are used to describe *looting at source*?

- "Raubbau am Gedächtnis der Menschheit" ("looting the memory of humanity")
- dem Boden entrissen ("ripped from the ground")
- anarchischen Verhältnisse nach dem dritten Golfkrieg 2003 ("anarchic situation after the third gulf war of 2003")
- locken besonders viele Raubgräber ("attract many looters")

Which words are used to describe *the antiquities market and market actors*?

- Hehlerei von geplündertem Kulturgut (fencing)
- "organised crime"

Which words are used to describe *antiquities*?

- Hehlerei von geplündertem Kulturgut ("looted cultural heritage")
- jahrtausendealte Kunstschätze ("millenia-old art treasures")
- gestohlenen archäologischen Fund ("stolen archaeological find")

- archäologische Funde aus Afghanistan ("archaeological finds from Afghanistan")
- bis zu 6.500 Jahre alte Kunstschatze ("art treasures")

Which devices are used to get/keep the reader's attention?

- Mohamed Atta story - terror financing
- dramatic, if not alarmist language
- age of the antiquities

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- looters who destroy archaeological context "for profit" (quote archaeologist Gerhard Rupprecht)

Which elements of moral panic are visible?

- Disproportion (figures comparable to drugs or arms trafficking, six to eight billion figures attributed to UNESCO)
- Concern: Loss of cultural identity and collective memory; terror financing; too little public awareness
- hostility (towards looters)

Which orientalist tropes are used?

- "anarchy" and war
- "a Sumerian Princess" - romanticised past
- terror financing

How is the *antiquities trafficking chain* constructed in this article?

- the collapse of order due to the war "draws in" looters, therefore objects are sold on in Germany
- "wie bei illegalen Objekten üblich fehlten amtliche Dokumente und Herkunftsangaben" - no provenance on illegally imported goods

Main Research Question:

How is "Raubbau am Gedächtnis der Menschheit" from the local newspaper IDSTEINER ZEITUNG ('Raubbau Am Gedächtnis Der Menschheit', 2011) framing the market for illicit antiquities in terms of a moral panic in 2011?

This piece is calling attention to an exhibition held in the central train station of Mainz and organised by the Römisch-Germanisches Zentralmuseum in Mainz and the Hessian state police (Landeskriminalamt), as well as the Iraqi embassy. It was titled "Kriminalarchäologie" - roughly "criminologist archaeology") and showcased cases of looting and restitution in the years leading up to it, including the aforementioned axe blade and gold vessel. The tone of the text is generally

dramatic, warning loss of cultural heritage in Iraq and worldwide. There is a clear sense of concern about looting and trafficking, as well as disproportional figures. Moreover, this article references the story about terrorist Mohammed Atta trying to sell Afghan antiquities to a German archaeologist.

27 Title: Erfolg im Kampf gegen Grabräuber

Publication: Idsteiner Zeitung

Date: 6. July 2011

Section: KULTUR

Author(s):

Article Genre: short news

Search Term Raubgrabung 16

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabung (looting)

Which words are used to describe *the antiquities market and market actors*?

- Verdacht auf illegalen Antikenhandel ("alleged antiquities trafficking")
- Auktionshaus
- "kriminelle Sumpf der Antikenhehlerei" - ("the criminal swamp of antiquities trafficking" - MMK)
- verbotene Handel mit irakischem Kulturgut ("illegal trade in Iraqi cultural propety" - illegal where, though?)

Which words are used to describe *antiquities*?

- kleine sumerische Goldvase
- wertvolle Stück
- sumerische Goldgefäß

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- antiquities dealers

Which elements of moral panic are visible?

- hostility
- concern

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Erfolg im Kampf gegen Grabräuber" ('Erfolg Im Kampf Gegen Grabräuber', 2011) framing the market for illicit antiquities in terms of a moral panic in 2011?

This short piece in a local newspaper reports the restitution of the gold vessel to Iraq. The case is called a "juridical tug-of-war". Michael Müller-Karpe is quoted again, warning of ineffective laws against the trade in illicit antiquities leading to further looting. The wording "criminal swamp of antiquities fencing" shows hostility (in this time period, most of the hostility comes from Müller-Karpe himself).

28 Title: Das Milliardengeschäft der Raubgräber

Publication: Der Tagesspiegel

Date: 7. July 2011

Section: WISSEN_FORSCHUNG

Author(s): Michael Zick

Article Genre:

Search Term Antikenhehlerei 5

Operational Research Questions:

Which words are used to describe *looting at source*?

- pockennarbig verwüsteten antiken Landschaften ("nacient landscapes, devastated as if by pockmarks")
- Raubgrabungen
- Was dort fünftausend Jahre relativ unbeschadet im Boden gelegen hat, ist nun von Raubgräbern völlig zerstört. ("things that lay relatively undamaged in the ground for five thousand years are now completely destroyed by looters")

Which words are used to describe *the antiquities market and market actors*?

- "Antiquitätenhändler" - "antiques dealer"
- "dubiosen bis kriminellen Handel mit antiken Kunstwerken und Kulturstücken" - the dubious to criminal trade in ancient works of art and cultural objects

Which words are used to describe *antiquities*?

- "ein knapp drei Zentimeter kleines Goldgefäß" - gold vessel described in terms of size and age
- "kostbaren antiken Stückes" - precious antiquity
- Artefakt, Objekt
- antike Kunstwerke (dealer quote)

Which devices are used to get/keep the reader's attention?

- Intro: talks between German and Iraqi state secretaries, restitution of the gold jar as "gesture"
- Outro: Looting is/could be a problem in Germany as well

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- antiquities dealers - in quote by MMK
- but also war
- lax laws in market countries

Which elements of moral panic are visible?

- "verheerenden Auswirkungen von Raubgrabungen und illegalem Antikenhandel" - devastating consequences of archaeological looting and antiquities trafficking - concern
- "Die Unesco schätzt den weltweiten Umsatz mit antiken Stücken pro Jahr auf sechs bis acht Milliarden Dollar." – disproportion

Which orientalist tropes are used?

- Mesopotamien, Sumer etc.

How is the *antiquities trafficking chain* constructed in this article?

- dealers rarely can prove legality
- some countries (Germany, France, UK) do not enforce their laws properly (as opposed to Switzerland), thus looted artefacts are sold
- only MMK fights against the dealer lobby

Main Research Question:

How is "Das Milliardengeschäft der Raubgräber" (Zick, 2011) framing the market for illicit antiquities in terms of a moral panic in 2011?

This piece again deals with the exhibition in Mainz and the case of the little gold vessel, which had been handed back to the Iraqi state secretary by his German colleague Guido Westerwelle days before. However, both of these events are just hooks for the text, which discusses the illicit antiquities trade in Germany (citing two more examples), and especially Michael Müller-Karpe's role as advisor to customs and law enforcement.

The destruction of Iraqi archaeological sites through looting is described in vivid terms, as well as high-profile sales of antiquities, which in quotes are said to be "rarely legal". Müller-Karpe is portrayed as a sort of "lone ranger" who stands alone on the side of law against the antiquities dealers. Notable in this text is that the other side is also quoted, citing an official statement of the

"Arbeitskreis Deutscher Kunsthandelsverbände" who complain about being persecuted by an "irrational, biased campaign".

Signs of moral panic can be seen from the disproportion of the sales cited once again and the juxtaposition with arms and drugs trade. Also there is a clear sense of concern about destruction of cultural heritage and archaeological contexts. There is no mention of terror financing yet, though.

29 Title: Teilerfolg für Antikenhändler

Publication: Aar-Bote

Date: 2. December 2011

Section: KULTUR

Author(s):

Article Genre: Short News

Search Term Antikenhehlerei 6

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabungen im Nahen Osten - "looting in the Near East"

Which words are used do describe *the antiquities market and market actors*?

- Antikenhändler
- Antiquar - "antiquarian"

Which words are used to describe *antiquities*?

- fünf vom hessischen Kultusministerium beschlagnahmte Gefäße aus babylonischer Zeit - "vessels from Babylonian times", "seized by the Hessian culture ministry"
- Gegenstände - objects

Which devices are used to get/keep the reader's attention?

- buries the lede on what is happening here

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is Teilerfolg für Antikenhändler ('Teilerfolg Für Antikenhändler', 2011) framing the market for illicit antiquities in terms of a moral panic in 2011?

This is just a very short notice in a local newspaper on a libel suit against Michael Müller-Karpe. The article uses the case of five ancient Iraqi vessels that had been seized, presumably on Müller-Karpe's expertise, and on a first glance it seems like the claimant may have gotten the objects back. In fact, it was only ruled that Müller-Karpe had to refrain from some statements the court ruled to be slanderous.

2012-2013

30 Title: Mehr als nur Kollateralschäden; Der syrische Bürgerkrieg hinterlässt Spuren am Kulturerbe

Publication: Neue Zürcher Zeitung

Date: 7. June 2012

Section: FEUILLETON

Author(s): Mona Sarkis

Article Genre:

Search Term Antikenhehlerei 7

Operational Research Questions:

Which words are used to describe *looting at source*?

- Plünderungen
- Sog aus Chaos, Kämpfen und Raubzügen - "a maelstrom of chaos, fighting and looting" (in Iraq, post 2003)
- in der Grabungsstätte von Ebla geplündert (plunder at the site of Ebla)
- Eine aufs 8. Jahrtausend v. Chr. datierte Goldstatuette, die einen aramäischen Gott darstellt, wurde vom Museumspersonal entwendet "A golden figurine depicting an Aramaic god, dated to the 8th millenium BCE, was stolen by museum personnel")

Which words are used to describe *the antiquities market and market actors*?

- Schwarzmarkt - black market
- internationale Antikenhehlerei - "international antiquities fencing"

Which words are used to describe *antiquities*?

- Kulturerbe - cultural heritage
- Zeugnisse einer jahrtausendealten Vergangenheit - testimonies of a millenia-old past (teaser)
- syrisches Kulturerbe - Syrian cultural heritage
- Keilschrift-Tontafeln aus dem 3. Jahrtausend v. Chr. - cuneiform clay tablets from the 3rd millenium BC (very specific, about Ebla)

- Antiken

Which devices are used to get/keep the reader's attention?

- mentions of destruction/thefts in Byzantine churches (connects reader through Christianity), Palmyra (potentially known to readers), etc...

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- unsuitable laws in Germany – note that this comes from a Swiss newspaper
- insufficient control of archaeological sites, partly due to no payment of guards bc of the war

Which elements of moral panic are visible?

- *concern* for cultural heritage

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

- different parties of the civil conflict, but also civilians (including museum employees) loot Syria's cultural heritage.
- Germany's laws make it easy to buy looted material

Main Research Question:

How is "Mehr als nur Kollateralschäden" (Sarkis, 2012) framing the market for illicit antiquities in terms of a moral panic in 2012?

This article describes the cultural looting and destruction in Syria during the civil war (which, in 2012, was just escalating), and draws parallels to looting and trafficking of antiquities in the wake of the 2003 invasion of Iraq. Quoting Michael Müller-Karpe, the piece warns that unsuitable legislation in Germany makes it easy to buy and sell looted antiquities from both Iraq and Syria. There is a clear sense of concern for cultural heritage. Syrian cultural heritage is connected to the (presumed German) reader by invoking Byzantine Christian heritage, sites from classical antiquity such as Palmyra, and the German archaeological mission Tell Halaf. Notably, the piece ends on the notion that "wherever conflicts flare up, people and cultural property suffer together".

31 Title: Geraubte Geschichte; Die Ausstellung „Kriminalarchäologie" informiert über Hehlerei mit antiken Kunstschätzen

Publication: Süddeutsche Zeitung

Date: 13. July 2012

Section: München (regional)

Author(s): Florian Fuchs

Article Genre: Report

Operational Research Questions:

Which words are used to describe *looting at source*?

- Plünderungen und Raubgrabungen

Which words are used to describe *the antiquities market and market actors*?

- illegal nach Deutschland geschmuggelt - "smuggled illegally"; tautology, for impact

Which words are used to describe *antiquities*?

- Mosul-Marmor
- assyrische Tempel und Paläste im heutigen Irak - Assyrian temples and palaces in modern Iraq
- Die 3000 Jahre alte Platte mit der Keilschrift

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- Hehler und Diebe: "fences and thieves"

Which elements of moral panic are visible?

- "It's not only that": Es gibt kaum Statistiken über den Umfang von Antikenhehlerei. Ermittler glauben, dass „nur die Spitze des Eisbergs" bekannt ist. "There are barely any statistics about the scope of antiquities trafficking, Investigators believe that only the tip of the iceberg is known." – implied disproportion?
- "der Händler behauptete" – disbelief/skepticism -> hostility?
- concern

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Geraubte Geschichte" (Fuchs, 2012) framing the market for illicit antiquities in terms of a moral panic in 2012?

This is a short text announcing the move of the exhibition "Kriminalarchäologie" to Munich airport, published in the Munich regional part of Süddeutsche Zeitung. It starts with the case of a cuneiform-inscribed Assyrian marble relief plate from Nimrud that had been offered at a Munich auction house in 2010. The terms used here are deliberately specific as to the modern country of origin, Iraq.

The explicit reason to hold the exhibition – not in a museum, but in a major European airport – is, quoting Michael Müller-Karpe "to entrench the awareness of antiquities smuggling in the public

consciousness". The article concludes with a "bittersweet happy ending" paragraph, relating that the relief plate has been given back to Iraq, but the criminal investigation against the dealer who tried to sell it has been dropped.

This, in combination with an earlier quote by an investigator, warning that known cases of antiquities trafficking are only "the tip of the iceberg", this leaves the reader with a feeling that something nefarious is going on, which ought to be stopped, but isn't. Among the signs for a moral panic following Goode and Ben-Yehuda (2010), this shows concern. The "tip of the iceberg" quote also reflects Cohen's "It's Not Only This" (Cohen, 2002).

32 Title: Erbe in Gefahr

Publication: Jüdische Allgemeine

Date: 16. August 2012

Section: ?

Author(s): Nils Metzger

Article Genre: background piece

Search Term Antikenschmuggel 8

Operational Research Questions:

Which words are used to describe *looting at source*?

- Plünderungen (looting)

Which words are used to describe *the antiquities market and market actors*?

Which words are used to describe *antiquities*?

- cultural heritage

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- the civil war/the general situation (no actual blame laid to any specific group)

Which elements of moral panic are visible?

- potential threat

Which orientalist tropes are used to rouse concern among the audience?

- higher focus on threat to heritage than to people
- evoking a "better past" (in this case, for Jewish citizens in Aleppo)?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is the article "Erbe in Gefahr" (Metzger, 2012a) framing the market for illicit Syrian antiquities in terms of a moral panic in 2012?

This is a report piece about the threat to Aleppo's historical old town in 2012, focusing on the Jewish heritage of Aleppo. It also provides background to Sephardic Jewish history in the city. Antiquities trafficking is mentioned only as a potential threat to the heritage of Aleppo, in a quote by UNESCO director general, Irina Bokova. While the author himself does not get into the topic of the antiquities market, the mention of Interpol and the general description of a heightened threat level could indicate the very early stages of a beginning moral panic about cultural destruction.

33 Title: Raubgut könnte aus verschollenem Tempel stammen

Publication: Der Spiegel

Date: 18. September 2012

Section: IRAN

Author(s): Nils Metzger

Article Genre:

Search Term Antikenschmuggel 9

Operational Research Questions:

Which words are used to describe *looting at source*?

- "ein Indiz dafür, dass Raubgräber in Anspan mehr Glück hatten." - "lucky" looters
- "illegale Grabung(en)" - illegal excavation, twice, in direct quotes from archaeologists

Which words are used to describe *the antiquities market and market actors*?

- Münchner Antikenmarkt ("Munich antiquities market" - Munich is home to two auction houses that have come up in cases before)
- "wo es 2007 auftauchte" - the object "surfaced"
- "Raubgräber [...] brachten den Silberschatz in Umlauf" - they "circulated" the artefact ("silver treasure")
- "Verdacht der Hehlerei" - stating (verbatim) the allegation by Munich prosecutors
- "ein den Behörden nicht unbekannter Sammler und Händler" - understated, but clearly insinuating the person as a bad actor
- "Antikenhehler" - indirect quote from Müller-Karpe

Which words are used to describe *antiquities*?

- "Raubgut"
- "ein Relikt aus einer Zeit, als in Iran noch öffentlich gebechert wurde" - a relic (from a supposedly better time? Note that "bechern" means drinking alcohol, getting drunk etc.,

somewhat understated, also a pun, as the author keeps calling the goblet "Becher", i.e., "cup")

- "Tempelbecher" - "temple cup"
- "aus massivem Silber und über und über mit Keilschriftzeichen verziert" - lush description. ("decorated" with cuneiform)
- "Silberschatz" ("silver treasure")
- illegal ausgegrabene Antiken - illegally excavated antiquities, indirect quote from Müller-Karpe
- "geplünderte Antiken" - looted antiquities

Which devices are used to get/keep the reader's attention?

- First emphasis on the high monetary value by mentioning material (silver), age (roughly 4000 yrs) and opening bid (60.000 Euro) - only then the historical value.
- story on how the temple of Napiriša was not found by regular excavators, but "lucky" looters

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- The author himself stays carefully neutral, yet it is clear that the consulted experts blame the German laws for the sale of probably looted material.
- also the dealer Houshang Mahoubian is cast as a villain - he is a known figure!
- "ein dichtes und professionalisiertes Schmugglernetz für alle Arten illegalen Im- und Exports" – smuggling networks for all kinds of goods post-sactions

Which elements of moral panic are visible?

- laments lack of appropriate legislation

Which orientalist tropes are used?

- "verschollener Tempel" – "lost" temple
- callback to a ("better") past where alcohol was consumed openly (1st sentence)
- romanticised images of "lucky" looters (although it is later acknowledged that economic hardship often leads to subsistence digging).

How is the *antiquities trafficking chain* constructed in this article?

- a "network of professional smugglers" provide the "Western" antiquities market with goods

Main Research Question:

How is the SPIEGEL article "Raubgut könnte aus verschollenem Tempel stammen" (Metzger, 2012b) framing the market for illicit Iranian antiquities in terms of a moral panic in 2012?

There is a clear distinction between the author's own voice and the quotes by Müller-Karpe and Mofidi-Nasrabadi. When talking about looting, the two archaeologists emphasise the loss of cultural heritage and the destruction of archaeological sites, as well as the illegality, while the author Nils Metzger almost romanticises the looting. The words used for the antiquities themselves are also notably different in tone: The quoted experts speak of "antiquities" or "cultural heritage", while Metzger himself uses more poetic (orientalist) language that evokes "looted treasure" from a "lost temple".

It is obvious that the author wants to catch the readers' attention with the exceptional object described, then leads over to problems of legislation in the antiquities market.

The dealer Houshang Mahoubian is subtly cast as the villain of this piece, even though it is mentioned that he was not convicted of any wrongdoing in this case. Generally, Metzger's writing over the piece goes from an almost romantic tone to a more matter of fact language, to a concerned voice at the end. Here the lack of appropriate legislation in Germany is noted (through one of the quoted experts). This could well put this article in the frame of a moral panic about heritage loss facilitated (inadvertently) by the German state. Notably, there is no mention of the Syrian civil war or the Iraq war in this piece.

34 Title: Hehlerei von Amts wegen

Publication: Handelsblatt

Date: 20. September 2012

Section: Unternehmen & Märkte

Author(s): Fabian Gartmann

Article Genre:

Search Term Antikenhehlerei 9

Operational Research Questions:

Which words are used to describe *looting at source*?

- "Plünderer"

Which words are used to describe *the antiquities market and market actors*?

Which words are used to describe *antiquities*?

- antiker Silberbecher ("ancient silver cup")
- 100-prozentig echt und nahezu sicher illegal beschafft ("100% authentic and almost certainly illegally obtained")
- ein antikes Kulturgut

Which devices are used to get/keep the reader's attention?

- "legendärer" Tempel von Anshan...

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- Mahoubian, Gorny&Mosch, and the German state

Which elements of moral panic are visible?

- slight hostility (towards authorities)

Which orientalist tropes are used?

- "legendary" temple

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Hehlerei von Amts wegen" (Gartmann, 2012) framing the market for illicit antiquities in terms of a moral panic in 2012?

This is a short piece on the case of an Iranian silver vessel that was sold by Munich auction house Gorny&Mosch and has been disputed by Michael Müller-Karpe as being "almost definitely" looted. Elements of moral panic are not prevalent here, but the article does mention the problem of proving an ancient object's illegal origin, even if it comes from a notorious figure like Mahoubian.

35 Title: Die Weltkultur brennt

Publication: Der Tagesspiegel

Date: 18. October 2012

Section: Wissen_Forschen

Author(s): Hakan Baykal

Article Genre:

Search Term Antikenschmuggel 10

Operational Research Questions:

Which words are used to describe *looting at source*?

- "Räuber und Plünderer bedienten sich an archäologischen Stätten und in Museen" - "looters helped themselves [to antiquities] in archaeological sites and museums" - bitter sarcasm
- "looting and plundering" - direct (transl.) quote from Emma Cunliffe
- "Plünderer"
- "Manche der Räuber sind sattsam bekannt" - some of the robbers are well-known
- derart professionell geplant und durchgeführt, dass es sich dabei nur um das Werk bestens organisierter Banden handeln kann - "planned and carried out professionally", "the work of superbly organised gangs"

Which words are used to describe *the antiquities market and market actors*?

- "Es gibt Kanäle in der Armee, die Antikenschmuggel betreiben." - "there are channels in the [Syrian] army that engage in antiquities smuggling" - direct quote Stefan Weber

Which words are used to describe *antiquities*?

- "wertvolle, unersetzliche Kulturgüter" - irreplacable cultural goods
- "Zeugnisse dieser einzigartigen Geschichte " - testimonies to [Syria's] unique history

Which devices are used to get/keep the reader's attention?

- description of fights in Aleppo, devastating effects on civilians
- Aleppo-9/11 comparison

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- criminal gangs of looters
- parts of the Syrian army
- destruction in war

Which elements of moral panic are visible?

- description of the war devastation?

Which orientalist tropes are visible?

How is the *antiquities trafficking chain* constructed in this article?

- more description of the source
- "channels" in the army

Main Research Question:

How is the article "Die Weltkultur brennt" (Baykal, 2012) in the newspaper Der Tagesspiegel framing the market for illicit Syrian antiquities in terms of a moral panic?

This article describes the effects of the fight for Aleppo during the Syrian civil war on the ancient structures and cultural heritage in the city and Syrian in general.

The author sets the scene by describing the at the time current fighting in Aleppo and its devastating effects on the civilian population, even going so far as to draw a comparison to "9/11", i.e., the day of the World Trade Center attacks in New York City. He then leads over to the destruction of Aleppo's cultural heritage: "Syrien verliert nicht nur Menschenleben, sondern auch wertvolle, unersetzliche Kulturgüter" – "Syria is not just (or: not "only") losing human lives, but also valuable (or: "precious"), irreplacable cultural goods". This framing device seems to put the cultural property at an equal level to human life, perhaps in the attempt to get the reader to care about the loss of cultural heritage even in the face of human tragedy. This is later moderated by indirect quotes from

the interviewed expert Stefan Weber from the museum of Islamic Art in Berlin, emphasising the severity of both human suffering and the destruction of cultural heritage in Syria.

Citing archaeologist Emma Cunliffe, the author describes the conflict-related cultural destruction in Syria generally. This is where looting is mentioned for the first time. It is noted that looting activities have become more severe than before. There is no mention of subsistence digging, instead the loss through looting is put on the shoulders of organised criminal gangs. A direct quote by Weber implicates parts of the Syrian army in the antiquities trafficking chain.

36 Title: Alles echt und legal an der Antiken-Messe in Riehen BS

Publication: Schweizerische Depeschagentur

Date: 2. November 2012

Section:

Author(s): SDA

Article Genre: Short news

Search Term Antikenhehlerei 10

Operational Research Questions:

Which words are used to describe *looting at source*?

- "Kunstdiebstähle während des Arabischen Frühlings"

Which words are used to describe *the antiquities market and market actors*?

- die Kunstwelt - "the art world"

Which words are used to describe *antiquities*?

- Im vergangenen Jahr hatten Plünderungen und Diebstähle antiker Kunstwerke unter anderem in Libyen, Ägypten und im Irak viele potenzielle Käufer verunsichert. Inzwischen gibt es auch Hinweise auf Kunstdiebstähle im Bürgerkriegsland Syrien. "In recent years, thefts of ancient artworks had unsettled many potential buyers. By now, there are even hints to art theft in the civil-war country Syria."

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

- no mention

Main Research Question:

How is "Alles echt und legal" (SDA, 2012) framing the market for illicit antiquities in terms of a moral panic in 2012?

This is a short report on an antiquities fair in Basel, Switzerland in 2012, the Basel Ancient Art Fair (BAAF). The title, which asserts that "Everything is legal and authentic" at the antiquities fair, already implies that this very fact has been called into question. The first sentence notes that "art thefts" during the "Arab Spring" had "unsettled the art world", i.e. might have deterred potential buyers. However, as the text quickly assures, all the dealers at this antiquities fair vouch for their artefacts' authenticity and legality.

It then goes on to detail the fair's opening date and its specialisation on antiquities from classical, ancient Egyptian, and ancient Near Eastern cultures. Again coming back to the so-called "Arab Spring" and "thefts from museums and excavation sites" it is claimed that "the fight against antiquities trafficking" will be "a big topic", but without further detailing how this is supposed to be done. Instead, two objects are described in more detail - in one case, with a detailed provenance. The last paragraph reads like a transcribed press statement from IADAA (who are the patrons of this fair), saying that they are giving themselves strict rules to ensure the legality of their objects. The report does not question the feasibility of this objective or the veracity of the arguably quite sweeping statement of the IADAA spokesperson. Instead of a moral panic about heritage, this reads like a reaction to one. It is also notable, and characteristic of the lingo of antiquities dealers and art fairs, that archaeological artefacts for sale are described exclusively in terms of artwork. Archaeological looting in countries subject to political crisis is framed as a potential problem for buyers of antiquities rather than for the people and nations who have been deprived of their heritage.

37 Title: "Wir reden hier über das Eigentum von Nationen"

Publication: Berliner Zeitung

Date: 2. April 2013

Section: POLITIK

Author(s): B. Steffens

Article Genre: Interview

Search Term Antikenhehlerei 11

Operational Research Questions:

Which words are used to describe *looting at source*?

- Museen geplündert ("plundered museums" Interviewer)
- Raubgrabungen

- Museumsplünderungen ... Raubgrabungen
- aus illegalen Grabungen und wurde illegal exportiert "from an illegal excavation and was exported illegally"
- Millionen Raubgrabungslöcher, "millions of looting holes"

Which words are used to describe *the antiquities market and market actors*?

- internationalen Antiken-Handel - international antiquities market
- Antikenhehlerei
- illegalen Markt

Which words are used to describe *antiquities*?

- Kulturschätze – cultural treasures
- Artefakte aus dem syrischen Raum – artefacts from the Syrian region
- entwendete Museumsobjekte ... Raubgrabungsfunde
- Antiken ungeklärter Herkunft "antiquities of unclear provenance"
- archäologische Funde zweifelhafter Herkunft "archaeological finds of dubious origin"
- Eigentum von Nationen – "the property of nations"
- Antiken

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- buyers of unprovenanced antiquities and the courts who will not stop them

Which elements of moral panic are visible?

- nicht nur rechtswidrig, sondern in erheblichem Maße sittenwidrig und gemeinschädlich – harsh condemnation (hostility, using legal terminology)
- unwiederbringliche Zerstörung der archäologischen Stätten mit den im Fundkontext erhaltenen Informationen (concern for archaeological context)

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

- Buyers of unprovenanced antiquities provide a financial incentive to loot

Main Research Question:

How is "Wir reden hier über das Eigentum von Nationen" (Steffens, 2013) framing the market for illicit Syrian antiquities in terms of a moral panic in 2013?

This is an interview with archaeologist Michael Müller-Karpe, discussing looting during the Syrian civil war and the potential of Syrian artefacts being sold in Germany. He explains how the provenance "Syria" has been dropped from auction catalogues in favour of more obfuscating terms,

and that objects from looted sites, unlike catalogued stolen museum pieces, have little chance of being restituted. He also remarks that German courts tend only to prosecute antiquities smuggling if the country of origin exercise a formal complaint and can prove the origin.

In terms of the signs of a moral panic following Goode and Ben-Yehuda (2010), there is a sense of *concern* for archaeological context and heritage, as well as some *hostility*, or at least condemnation of the practice of buying unprovenanced antiquities. There is also a call for a different legal practice, effectively, for courts to take stricter action against deals in illicit antiquities.

In his last answer, Müller-Karpe makes the connection from looting in Syria and Syrian antiquities to other countries subjected to archaeological looting (Iraq, Italy, Greece, Peru, and Cambodia) to make clear that this is a global problem and that the antiquities market generally is suspect.

2014-2015

38 Title: Machtloser Westen

Publication: Berliner Zeitung

Date: 5th July 2014

Section: Meinung

Author(s): Martina Doering

Article Genre: Opinion/Commentary

Search Term Antikenschmuggel 11

Operational Research Questions:

Which words are used to describe *looting at source*?

Which words are used to describe *the antiquities market and market actors*?

- Antikenschmuggel ("antiquities trafficking")

Which words are used to describe *antiquities*?

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- IS, more or less

Which elements of moral panic are visible?

- concern/hostility towards IS "ein Heer testosteron-getriebener, bindungsloser, von der Gesellschaft nicht gebrauchter junger Männer" - tr: "an army of testosterone-driven young men without emotional attachment, unneeded by society" maroding around
- financed from gulf states, money from "extortion, antiquities trafficking, and looting"

- Title transl.: "Powerless West"

Which orientalist tropes are used?

- "endless war" (that leads to "loss of civilisation" in people, esp. young men) trope

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is the op-ed "Machtloser Westen" (Doering, 2014b) framing the market for illicit IRAQI and SYRIAN antiquities in terms of a moral panic?

This is an opinion piece about the advance of the terror group IS in 2014. Elements of moral panic, such as a state of alarm about the terrorists is clearly visible. Antiquities trafficking is only mentioned as an aside, but the piece already alludes to looting and trafficking supposedly "filling IS's pockets".

39 Title: Die Kunstmafia und die Kriegsmillionen; Zwei Filme über illegalen Kunsthandel

Publication: Neue Zürcher Zeitung (Internationale Ausgabe)

Date: 2. September 2014

Section: FEUILLETON

Author(s): Geneviève Lüscher

Article Genre: TV Review

Search Term Raubgrabung 17

Operational Research Questions:

Which words are used to describe *looting at source*?

- Plünderung antiker Stätten ("plundering of ancient sites")
- Plünderungen in Afghanistan und Syrien, wo Rebellengruppen Antiquitäten gegen Waffen tauschen ("looting in Afghanistan and syria, where rebel groups exchange antiquities for guns")
- bitterarm und halten sich mit Raubgrabungen über Wasser ("...extremely poor, and sustain themselves by looting")
- Plünderungen

Which words are used to describe *the antiquities market and market actors*?

- Kunstmafia ("art mafia")
- Milliardengeschäft mit der Raubkunst ("billion dollar trade with looted art")
- ein Geschäft [...], das laut der Unesco nach dem Waffen-, Drogen- und Menschenhandel an vierter Stelle der internationalen Kriminalität steht ("a trade [...], which comes fourth in international crime after arms, drugs, and human trafficking, according to Unesco")

- Auktionshaus
- mutmasslichen Hintermänner [...], die sich als ehrenwerte Kunsthändler ausgeben - "the suspected masterminds [...], that pretend to be respectable art dealers"
- noblen Galerie
- Die Galeristen wissen, dass sie mit Raubkunst handeln, dass an ihrer Ware Blut klebt. - "The gallerists know that they are trading spoils of war, that there is blood on their wares."

Which words are used to describe *antiquities*?

- Raubkunst
- Relikte
- aus einer Raubgrabung stammende Antike

Which devices are used to get/keep the reader's attention?

- IS and Iraq as entry
- fabulous sums of money

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- everyone along the trafficking chain

Which elements of moral panic are visible?

- concern (especially in the review part)
- disproportion

Which orientalist tropes are used?

- claim that there is no "understanding of the past" in local Afghan or Syrian residents (while acknowledging the factor of poverty and subsistence digging)

How is the *antiquities trafficking chain* constructed in this article?

- antiquities are dug up by poor locals in conflict regions, smuggled by professional criminals and then end up in the glitzy galleries of seemingly respectable but complicit art dealers.

Main Research Question:

How is "Die Kunstmafia und die Kriegsmillionen" (Lüscher, 2014) framing the market for illicit antiquities in terms of a moral panic in 2014?

This is a review of two TV documentaries on the illicit antiquities trade from 2014, one focused on Cambodia, the other on Syria and Afghanistan. The reviewer acknowledges the background research in both films, especially on the complicity of the market in looting, but criticises that there is too little discussion of the harms done by looting to the archaeological context. Disproportionate claims of the money made in illicit antiquities are made, and there is definitely a sense of concern for cultural heritage. Notably the IS terror financing through looting is called a "rumour" in this

piece. Unlike many other articles on the topic, this one has no discussion of inadequate legislation, perhaps because this is not a topic in the reviewed films, but perhaps because this is an article for a Swiss, not German paper.

40 Title: Sie holen die Kunst mit Waffengewalt

Publication: DIE ZEIT

Date: 11. September 2014

Section: Feuilleton

Author(s): Tobias Timm

Article Genre: Interview

Search Term Antikenschmuggel 12

Operational Research Questions:

Which words are used to describe *looting at source*?

- "Raub und Schmuggel von Antiken" - looting and trafficking of antiquities (interviewer)
- Removing of "chests" from the museum in Raqqa by IS terrorists (Weber)
- "Es plündern auch andere Akteure in Syrien?" - looting, actors (interviewer trying to be neutral)
- Plünderungen (looting)
- Apamea = Swiss cheese
- Raubgrabungslöcher - looting holes
- bewaffnete Banden - armed gangs

Which words are used to describe *the antiquities market and market actors*?

- "Antiquitätengeschäfte" (antiques shops)
- "Antikenhändler" (antiquities dealers)
- "Privatsammler"
- "sehr vermögende Menschen" - very wealthy people

Which words are used to describe *antiquities*?

- "Kunst" - art (Title)
- "Objekte" (Weber)
- "kostbare Antiken" (Weber)
- "Beute" (interviewer)
- "geraubte Antiken"
- "heiße Ware" - stolen property
- antiquities that seem "not kosher" (Weber)

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- IS (implied by the whole setup), but also the Syrian army, "armed gangs", and the local population (Weber)
- the collapse of public order (Weber)
- also trafficking networks and too-lax laws in Germany

Which elements of moral panic are visible?

- decrying lax German laws
- emphasising severity of the situation - concern
- "Der internationale Antikenschmuggel ist ein Milliardengeschäft" - a billion-dollar industry, third only to drugs and arms trafficking - disproportion
- asking for new laws, better training of customs officers

Which orientalist tropes are used?

- suspicions (rumours) toward gulf region
- appeal to Syria's multi-confessional past (as opposed to a supposedly strict Islamist present)

How is the *antiquities trafficking chain* constructed in this article?

- IS loot museums and collect taxes from "smugglers"; army, gangs, and locals loot after the collapse of order
- Southeast Turkey does not enforce its own antiquities laws, Lebanon and Israel have always been hotbeds of smugglers (Weber)
- buyers in the gulf region, wealthy private collectors both in "Arab countries and the West"
- German law makes it "easy to import antiquities with forged paperwork" (Weber)
- sold in auction houses etc.
- Weber says his own museum does not accept loot, but there are "rumours" that "some museums in the gulf region" will buy any object without paperwork

Main Research Question:

How is "Sie holen die Kunst mit Waffengewalt" (Timm, 2014) framing the market for illicit Iraqi and Syrian antiquities in terms of a moral panic in 2014?

This is an interview with Stefan Weber, the director of the Islamic art department of the Pergamonmuseum in Berlin, about antiquities looting and destruction in Syria. While leading with the IS's involvement in the trade, Weber points out that other parties have been and are still looting Syria's archaeological sites and museums. From descriptions of the destruction at source, the discussion moves to antiquities being moved out of the country through transit countries such as

Turkey, Lebanon, and Israel, to the gulf states or the "West". It is notable that Weber brings up German law here, decrying that it is too easy to import looted ("not kosher") antiquities to Germany. His call for new laws and better training for customs officers and police fits well within the frame of a moral panic.

41 Title: Allahs gierige Räuber

Publication: Berliner Zeitung

Date: 21. October 2014

Section: Politics

Author(s): Martina Doering

Article Genre:

Search Term Antikenschmuggel 13

Operational Research Questions:

Which words are used do describe *looting at source*?

- "Raubgräber am Werk" looters at work
- durchwühlen - "ransack"
- "zum Teil mit hochmodernem Gerät" - "with state of the art equipment"
- detailed description
- "plündern" - looting, over and over

Which words are used do describe *the antiquities market and market actors*?

- "global operierende Händler" – "globally operating dealers"
- "auf dem internationalen Kunstmarkt" – "international art market"
- Sammler in Europa, inzwischen auch in China und seit einigen Jahren zunehmend in den Golfstaaten - Europe, China, and recently gulf states
- "illegaler Kunstmarkt" – illegal art trade

Which words are used to describe *antiquities*?

- antike Objekte – ancient objects
- examples (Wandfriese, Statuen...)
- "Material zum Plündern" (ironic)
- Kulturerbe "cultural heritage"
- "Objekte aus Museen, Tempeln oder Raubgrabungen"

Which devices are used to get/keep the reader's attention?

- detailed, graphic descriptions of looting
- high numbers for importance

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- IS (rumoured as active since 2011)
- too lax laws in Germany
- dealers

Which elements of moral panic are visible?

- trafficking as main source of income for IS (disproportion)
- 36 million USD (disproportion)
- too lax/ too easily circumvented
- call to criminalise antiquities trade altogether (Müller-Karpe), call to lay the burden of proof to market actors (author)

Which orientalist tropes are used?

- Mesopotamia
- "Unter jedem Hügel in der flachen Landschaft befinde sich, so heißt es unter Archäologen, ein Tempel, ein Palast, die Grabstätte eines Königs." – "under every hill in the flat landscape, archaeologists say, there is a temple, a palace, or the tomb of a king" – in essence, that is just the concept of a tell explained, but put quite romanically here...
- "Allah's greedy looters" (Title)

How is the *antiquities trafficking chain* constructed in this article?

- IS loots or takes 50% tax
- no mention of non-IS looting
- smuggled across borders to Turkey or Lebanon, then on to other countries
- vagueness noted
- laws in Germany explained

Main Research Question:

How is the article "Allahs Gierige Räuber" (Doering, 2014a) framing the market for illicit Iraqi and Syrian antiquities in terms of a moral panic in 2014?

This piece is drawing attention to the looting of Syrian and Iraqi antiquities by the terror group IS and their involvement in transnational antiquities trafficking. It opens with a graphic description of looting activities in Syria. The words used are clearly geared to create shock at the destruction, reminding the audience of the rich heritage of Syria and Iraq, "the region of ancient Mesopotamia". The sentence "Unter jedem Hügel in der flachen Landschaft befinde sich, so heißt es unter Archäologen, ein Tempel, ein Palast, die Grabstätte eines Königs." merits special attention, as it gives a slightly distorted/exaggerated image of the archaeology of Western Asia. Translated, it says

"Archaeologists say that under every hill in the flat land, there is a temple, a palace, the tomb of a king." While it is true that most parts of Iraq and Syria are so flat that ancient settlements made up of layers of mudbrick buildings stand out, and many of them indeed feature public buildings, the wording here is overly poetic, evoking a romanticised image of archaeology as a historical treasure-hunt.

The second part of the article deals more directly with the terror group's supposed involvement in the looting and trafficking of antiquities, using high numbers for both the revenue the terrorists are rumoured to make from the sale of antiquities, and the proportion of their income that comes from trafficking (50% is the quoted figure here, although it only says "trafficking", not what is trafficked, specifically). It is notable that looting by other factions, or unaffiliated civilians, in the Syrian civil war, or pre-conflict looting in the region are not mentioned at all in this article, in contrast to most earlier texts on the subject. This frames IS as the sole (or at least main) perpetrator in the looting and trafficking of Syrian and Iraqi heritage. There is a comparison to looting after the invasion of Iraq in 2003, but mainly used as a contrast, saying that this time, there is a higher public and political interest in researching the looting and ties to the international market. It does not say here specifically that IS is the reason for this interest, but it seems to be implied.

The third part of the article deals with the trafficking of ancient objects out of the country and their eventual sale on the international art market. Here the article notably deals with the situation in Germany, after briefly mentioning other market countries. Gaps in legislation are noted here, quoting Michael Müller-Karpe as expert. Müller-Karpe (true to style) calls the legal situation as is "Kunstraubförderungsgesetz" – "legislation to support looting". The article text itself makes a remark on Germany's tardiness in ratifying the 1970 UNESCO convention, "only in 2007". Müller-Karpe is quoted calling for the criminalisation of all antiquities trading so as to eliminate any incentive to loot. The article's author herself also calls for stricter legislation, although in a less drastic way: her idea is to lay the burden of proof of legality on the buyers of ancient artefacts. Elements of moral panic visible here are the dramatic description of the problem, and the connection of antiquities looting and trafficking with the terror group IS, and IS alone. This is also reflected in the fact that this article was published in the Politics section, as opposed to the Arts and Culture section, which more often houses articles that deal with archaeology-adjacent topics. The call for stricter legislation also reflects a moral panic.

42 "An diesen Dingen klebt Blut"; ANTIKENKÄUFE Archäologe warnt vor Handel mit illegalen Kulturgütern / Geldquelle für Terroristen

Publication: Idsteiner Zeitung

Date: 23. October 2014

Section: KULTUR

Author(s): Oliver von Riegen

Article Genre: Interview

Search Term Antikenhehlerei 12

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabungen und Museumsplünderungen - "looting of sites and museums"

Which words are used to describe *the antiquities market and market actors*?

- Handel mit illegalen Kulturgütern in Deutschland - "trade in illegal/illicit cultural goods in Germany"
- illegalen Handel mit antiken Kulturgütern
- "kunstsinnigen Antikenkäufer" sophisticated buyer of antiquities

Which words are used to describe *antiquities*?

- illegale Kulturgüter "illegal" or rather illicit cultural goods?
- Raubkunst "spoils of war/looted art"
- geplündertem Kulturgut "looted cultural property"
- Plünderungsgut "loot/plunder"

Which devices are used to get/keep the reader's attention?

- IS terrorists in the title and teaser, then only taken up again in the second-to-last question

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

- sechs bis acht Milliarden Dollar, mehrstelligen Milliardenbetrag – disproportion
- concern
- Hehler fälschen oder verschweigen die Herkunft der heißen Ware – hostility
- laws not strict enough, authorities idle/lazy

Which orientalist tropes are used?

- terrorists
- cradle of civilisation

How is the *antiquities trafficking chain* constructed in this article?

- "war and chaos" lead to more looting, which feeds into a growing antiquities market
- German law enforcement is idle due to inappropriate laws

Main Research Question:

How is "An diesen Dingen klebt Blut" (von Riegen, 2014) framing the market for illicit antiquities in terms of a moral panic in 2014?

This is a piece from the culture section of local newspaper IDSTEINER ZEITUNG, and another Interview with Michael Müller-Karpe (it's in the local newspaper, because Müller-Karpe works in Mainz). The words used to describe antiquities are predominantly favouring the "cultural heritage" aspect. Müller-Karpe laments the largely unchecked antiquities market in Germany, once again noting that most unprovenanced antiquities must be looted. When describing the deals in illicit antiquities he uses terms related to criminality, such as "Straftaten", "Hehlerei" and "illegal". He speaks of a growing market for looted antiquities citing figures "in the double digits of billions" for the whole market, which carries a sense of disproportion.

The interviewer steers the discussion towards IS in the second-to-last question. Müller-Karpe evades the question by going back to Mohammed Atta and making the more general statement that "there is blood on these objects", which made it to the title of the article. Uncharacteristically, or perhaps ironically, he seems to have some empathy for buyers of blood antiquities, calling the aforementioned "a bitter realisation for sophisticated buyers of antiquities".

43 Title: Raubkunst; Westliche Antiken-Käufer finanzieren Messer des IS

Publication: Welt Online

Date: 18. November 2014

Section: Geschichte

Author(s): Christian Frey

Article Genre: Report

Search Term Antikenschmuggel 14

Operational Research Questions:

Which words are used to describe *looting at source*?

- "Raubgrabungen"
- "verarmte Bauern" - "impoverished farmers" (as subsistence diggers)
- "Raubgrabungen mittlerweile ganze Ruinenstätten zerstört" "looting has destroyed entire sites by now"
- "Reißt man ein Stück aus dem Boden, zerstört man ein ganzes Archiv." - "if you rip an object out of the ground, you destroy an entire archive"

Which words are used to describe *the antiquities market and market actors*?

- "Schwarzmarkt" – "black market"
- illegaler Handel mit Antiken

- Der internationale Schwarzmarkt mit Antiken
- "zentrale Säule der organisierten Kriminalität" – a central pillar of organised crime
- "kaum mehr vorstellbares Ausmaß" – "a barely imaginable scope"
- "Nummer zwei der umsatzstärksten illegalen Erwerbsquellen"
- Preiseinbrüche auf den Kunstmärkten
- "Wertschöpfungskette, die Plünderer und Käufer verbindet" – nice!
- "bis sie schließlich beim vornehmen Inhaber erlesener Repräsentanzen auf Antikemessen oder dem renommierten Auktionator landen" – irony
- Hehler (Müller-Karpe)

Which words are used to describe *antiquities*?

- "Laboruntersuchungen" (technobabble)
- "sumerische Arbeit [...] aus dem Süden des Zweistromlandes" – "Mesopotamia" only later: Iraq
- "orientalische Kunstwerke"
- antike Fundstücke
- Hehlerware
- "heiße Ware"
- antike Kunst
- "gelten als sichere Anlageobjekte mit überdurchschnittlicher Wertsteigerung"

Which devices are used to get/keep the reader's attention?

- speculating about king's tombs, Ur...
- "neue Dimension"
- Mohamed Atta
- big words: "kaum mehr vorstellbares Ausmaß" etc.
- "illegale Herkunft der heißen Ware" tautology

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- buyers
- auction houses
- IS

Which elements of moral panic are visible?

- "durch den Vormarsch der Terrorgruppe Islamischer Staat eine neue Dimension erlangt" – concern, exaggeration?
- disproportion

- "Sammelwut oder kühlem Erwerbsgeist" - hostility

Which orientalist tropes are used?

- "orientalische Kunst"
- callback to 9/11
- terrorists, generally
- "Western"

How is the *antiquities trafficking chain* constructed in this article?

- tightly linked to other illegal trafficking, organised crime, human, drugs, arms trafficking
- "Die Käufer im Westen haben unter Umständen das Messer finanziert, mit dem die Köpfe westlicher Geiseln abgeschnitten werden." – "Western buyers may have funded the knife that cut off the heads of Western hostages" (Müller-Karpe)
- licenses to loot for locals, tax on finds
- it's a business venture for collectors

Main Research Question:

How is "Raubkunst" (Frey, 2014) from Welt Online framing the market for illicit Iraqi and Syrian antiquities in terms of a moral panic in 2014?

This is a report on a wandering exhibition on looting and antiquities trafficking from Iraq and Syria. What is quite obvious here is that the tone towards antiquities dealers, auction houses and collectors is harsher than in many earlier articles on the topic, with their motives being described as mainly financial and irrespective of law or archaeological context - there is a definite hostility.

Antiquities trafficking is again called one of the biggest sources of income for IS, and in a quote from Michael Müller-Karpe, it is even said that "Western (antiquities) buyers paid for the knives that cut off the heads of Western IS hostages", to connect the two ends of the supply chain.

Antiquities trafficking is now linked to IS as a matter of course.

44 Title: "Raubgrabungsfunde können auf keiner Liste stehen"

Publication: Berliner Zeitung

Date: 21. November 2014

Section: Feuilleton

Author(s): Martina Doering

Article Genre: Interview

Search Term Antikenschmuggel 15

Operational Research Questions:

Which words are used do describe *looting at source*?

- Raubgrabungen
- von Plünderungen angerichtete Zerstörungen – "destructions wrought by looting"

Which words are used to describe *the antiquities market and market actors*?

- internationale Schmuggler antiker Kunst – "international smugglers of ancient art"
- Antiken-Hehlerei – "antiquities fencing"
- Antikenhandel/händler
- Diejenigen, die weiterhin aus Plünderungen Gewinn ziehen wollen – "those who would continue to profit from looting"

Which words are used to describe *antiquities*?

- Antiken "antiquities"
- archäologische Funde "archaeological finds"
- heiße Ware "stolen goods"

Which devices are used to get/keep the reader's attention?

- terrorism

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- buyers
- antiquities dealers: "Denn wenn die Strafverfolgungsbehörden Legalitätsnachweise einfordern, kann der etablierte Antikenhandel seine Pforten schließen." – "When law enforcement starts to demand proof of legality, the established antiquities trade can close up shop" (MMK)
- IS (implied by interviewer)

Which elements of moral panic are visible?

- concern
- hostility ("Hehlerschutz-Gesetz")
- Hope for new/changed laws

Which orientalist tropes are used?

- terrorists

How is the *antiquities trafficking chain* constructed in this article?

- Trade with unprovenanced antiquities providing appeal to loot
- IS gives out claims and collects tax. Other looters are not mentioned.

Main Research Question:

How is "Raubgrabungsfunde können auf keiner Liste stehen" (Doering, 2014c) framing the market for illicit Iraqi and Syrian antiquities in terms of a moral panic in late 2014?

This is an interview with Michael Müller-Karpe about the planned changes in German antiquities law. It starts with a criticism of the then-effective *Kulturgüterrückgabegesetz*, i.e., "cultural property restitution law" from 2007. The opener also mentions terrorism financing through antiquities. The signs of moral panic are visible in the concern expressed about IS in Iraq and Syria, also the hostility by Müller-Karpe towards antiquities dealers, which he summarily calls "fences". There is also a clear hope towards the planned new law, which had been newly announced.

45 Title: Der "Islamische Staat" und die Antiken; Vom Millionenraub, der sich nicht belegen lässt

Publication: DIE ZEIT

Date: 4. December 2014

Section: FEUILLETON

Author(s): Fritz Zimmermann

Article Genre:

Search Term Antikenschmuggel 16

Operational Research Questions:

Which words are used to describe *looting at source*?

- "Millionenraub"
- "Zweifellos werden in Syrien und auch im Irak Kunstschätze geraubt" - downplay?
- Desaster – not downplay
- "Die Stätten sehen aus wie Mondlandschaften, so viele Löcher haben die Kunstdiebe gegraben" – sites looking like moonscapes
- "etablierte Grabräuber" – established looters (lit. "grave robbers")

Which words are used to describe *the antiquities market and market actors*?

- Antikenschmuggel

Which words are used to describe *antiquities*?

- "Kunstobjekte" - art objects
- "Kunstschätze" - art treasures
- "Kulturerbe" - ironically

Which devices are used to get/keep the reader's attention?

- irony, mockery
- flowery language

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- "clans and tribes"
- the war

Which elements of moral panic are visible?

- essentially, the unverifiable claims of millions are used to call out the moral panic

Which orientalist tropes are used?

- "barbarische Terrorbande" classic orientalism
- antiquities as "art" and "treasure"
- "Familien und Stämme kontrollieren das Geschäft mit den Kulturgütern bereits seit Jahrzehnten" – families and clans have been controlling the business for decades
- "Antikenschmuggel hat Tradition" – antiquities smuggling is a tradition

How is the *antiquities trafficking chain* constructed in this article?

- a family business of "clans and tribes", that has "tradition"

Main Research Question:

How is "Der "Islamische Staat" und die Antiken; Vom Millionenraub, der sich nicht belegen lässt" (Zimmermann, 2014) framing the market for illicit Iraqi and Syrian antiquities in terms of a moral panic in late 2014?

Without using the term moral panic, the article contests the claims of high financial gain for IS from antiquities trafficking, calling out the British paper The Guardian, for having "disseminated" – "In die Welt gesetzt" – these claims. The title "Millionenraub" – ironically – evokes ideas of bank heists and sets the slightly mocking tone of the piece.

It is notable that, much like in earlier – that is, pre-2003 – articles on the topic, the words used for ancient artefacts are mostly along the lines of "art" and "treasure". This orientalist language is also seen in the nebulous allegations of "tribes" controlling the looting and trafficking of antiquities. Perhaps also in that vein is the discussion of fakes among the trafficked antiquities.

While the author agrees that looting is especially severe during crisis, he stresses that it also takes place outside of the civil war, calling it a "tradition". The author also alleges that the same "clans and tribes" have been controlling antiquities trafficking "for decades". It is said that IS taxes antiquities trafficking with 20% while "leaving the antiquities to the established graverobbers".

While this claim is lower than the 50% that have been brought up in other articles, there is no actual difference in the described m.o. of the terror group. However, the author draws the conclusion that there is "no evidence that IS actively takes part in looting".

The author then directs the discussion towards willful destruction, quoting an opinion that this is "the bigger problem", followed by another quote that points out the problem of identifying looted

material that has not been catalogued beforehand. The article concludes in a tone which suggests that trying to fight the trade with illicit conflict antiquities is a pointless endeavour.

46 Title: "Der Schaden ist unermesslich"; Ist Deutschland ein Drehkreuz für geraubte antike Kunstwerke? Ein Gespräch mit Monika Grütters und Hermann Parzinger

Publication: DIE ZEIT

Date: 4.December 2014

Section: FEUILLETON

Author(s): Tobias Timm, Fritz Zimmermann

Article Genre: Interview

Search Term Antikenschmuggel 17

Operational Research Questions:

Which words are used to describe *looting at source*?

- "Raubgräber" (interviewer and Parzinger)
- "Raubgrabungen" (Parzinger)
- "Plünderer" (Parzinger)
- Grütters mentions archaeological context
- descriptive: "Bilder von antiken Stätten, die durchwühlt wurden und danach Schlachtfeldern gleichen, ein Loch neben dem anderen" - "pictures of ancient sites that have been ransacked and now resemble battlefields, full of holes"

Which words are used to describe *the antiquities market and market actors*?

- "private Sammler" ("private collectors" Parzinger)
- "Antikenschmuggel" ("antiquities smuggling" Interviewer)
- "Kunstmarkt" art market (Grütters)
- "Sammler" (Interviewer)
- "Privatpersonen" (Grütters)

Which words are used to describe *antiquities*?

- "antike Kunstwerke" (Title)
- "Votivgaben" (Parzinger, about stolen idols in Northern Pakistan)
- "vermeintlich wertvolle Objekte" - "archäologisch wichtige Stücke" (Parzinger)
- "geraubte Antiken" (Interviewer)
- "archäologische Objekte" (Parzinger)
- "Raubgut" (Interviewer)
- "Kulturerbe", "Kulturgut" ("cultural heritage, cultural property" Grütters)

- "Hehlerware" ("stolen goods" Grütters)

Which devices are used to get/keep the reader's attention?

- anecdote about confronting looters (Indiana-Jones mystique)
- reference to IS

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- the antiquities market and unsuitable laws, aka "soft rules" (Grütters)
- antiquities market lobby
- Which elements of moral panic are visible?

Which orientalist tropes are used?

- Indiana-Jones-mystique for Parzinger

How is the *antiquities trafficking chain* constructed in this article?

- Parzinger upholds that looted antiquities are sold to private collectors, while the interviewer presses whether museums buy loot

Main Research Question:

How is "der Schaden is unermesslich" (Zimmermann & Timm, 2014) framing the market for illicit Iraqi and Syrian antiquities in terms of a moral panic in 2014?

This is an interview ahead of a conference about cultural looting held on 11th and 12th December 2014 in Berlin ("Kulturgut in Gefahr"). Note that it was published in the same issue of the weekly newspaper DIE ZEIT as the last article, and one of the interviewers is the same as that article's author. The interviewees are Hermann Parzinger, president of the Stiftung Preußischer Kulturbesitz, who was hosting the conference, and Monika Grütters, then German State Secretary for culture, who was promoting her planned amendment for the cultural property protection law.

The difference in language between interviewers and interviewees is notable especially in reference to antiquities: While Parzinger and Grütters use terms such as "archaeological objects" and "cultural property", the interviewers speak of "ancient art", and "loot". The former centers the intangible qualities of antiquities, such as their value for heritage and science or their legal status ("Hehlerware" - stolen goods), while the latter focuses more on the materiality of the object.

While denying that recent reports about IS dealing in looted antiquities had anything to do with the amendment of the law, Grütters acknowledges that the publicity was welcome.

The interviewers try to "trip" their interview partners several times: First, by asking how museums can make sure they do not buy looted antiquities, later by asking about colonial acquisitions. While both questions are deflected by Parzinger with explanations of the legal status, the interviewers

create a moral equivalency between museums and private collectors who buy unprovenanced antiquities.

47 Title: DIE BEDROHTE VIELFALT DES ORIENTS

Publication: Der Tagesspiegel

Date: 21. December 2014

Section: POLITIK

Author(s): Martin Gehlen

Article Genre: longread

Search Term Antikenhehlerei 13

Operational Research Questions:

Which words are used to describe *looting at source*?

- Statuen und Mosaike werden gezielt zertrümmert, andere Exponate nur geschont, um mit ihrem Verkauf die Kriegskasse zu füllen - "statues and mosaics are systematically destroyed, other exhibits only spared to fill the war chests through their sale"
- plünderten die Islamisten das Museum der Stadt Rakka

Which words are used to describe *the antiquities market and market actors*?

- schwunghaften Handel
- skrupellosen und nimmersatten internationalen Schwarzmarkt - "unscrupulous and insatiable international black market"
- Kunsthändler

Which words are used to describe *antiquities*?

- die vorislamischen Schätze Syriens und Mesopotamiens "pre-Islamic treasures of Syrian and Mesopotamia"
- geraubten Kunst

Which devices are used to get/keep the reader's attention?

- graphic description of cultural destructions

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- terrorists and "an unscrupulous and insatiable black market"

Which elements of moral panic are visible?

- disproportion
- hostility
- concern (apocalyptically)

Which orientalist tropes are used?

- "Orient" Nostalgia
- Mesopotamia
- terrorists as barbarians
- "no democracy in the Arab world"
- "Kalaschnikow-Islam"

How is the *antiquities trafficking chain* constructed in this article?

- IS loots museums and sites, destroys antiquities, unless they sell them into the "black market" of antiquities and gets fabulously rich, second source of income after oil
- antiquities dealers lie

Main Research Question:

How is *DIE BEDROHTE VIELFALT DES ORIENTS* (Gehlen, 2014) framing the market for illicit antiquities in terms of a moral panic in 2014?

This is a longread about the terror and cultural destruction wrought by the advance of the so-called Islamic state in the fall of 2014, but especially their supposedly fabulous income from antiquities trafficking. It also problematises the role of antiquities dealers by quoting Margarethe von Ess, quite sardonically describing the way auction houses handle their material. The tone of the article is almost hysterical, and in line with three moral panics: Heritage, Islamist terrorists, and refugees.

48 Title: Ein Zeichen gegen Grabräuber

Publication: Wormser Zeitung

Date: 23. January 2015

Section: KULTUR

Author(s): Bernd Funke

Article Genre:

Search Term Antikenhehlerei 14

Operational Research Questions:

Which words are used to describe *looting at source*?

- "Grabräuber" – "grave robbers"
- Raubgrabungen und Antikenhehlerei
- "Antike Ruinenstätten ... mit schwerem Gerät durchwühlt"

Which words are used to describe *the antiquities market and market actors*?

- "Kunsthändler" – "art dealer"
- der weltweit vernetzte Antikenhandel – the globally connected antiquities market

Which words are used to describe *antiquities*?

- Objekte
- geraubten Grabbeigaben

Which devices are used to get/keep the reader's attention?

- Nice feature intro to the case study
- IS of course
- "mehreren Milliarden Dollar" several billions of dollars

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- global antiquities market / organised crime ("Mafia")

Which elements of moral panic are visible?

- disproportion (several billions of dollars ... exactly as much money as arms, drugs, or human trafficking)
- concern (for archaeological context/heritage)
- optimistic outlook on change of laws

Which orientalist tropes are used?

- "Mesopotamia"
- "cradle of civilisations"
- "common archaeological heritage" (arguably)
- IS is there

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Ein Zeichen gegen Grabräuber" (Funke, 2015) framing the market for illicit antiquities in terms of a moral panic in 2015?

This short piece from the regional newspaper Wormser Zeitung about the restitution of a neolithic axe head to Italy, however, looting in Syria and the planned amendment of the cultural property protection law are mentioned as well. One phrasing that stands out is "Raubgrabungen und Antikenhehlerei" - antiquities looting and trafficking, put together in one phrase, which indicates a close connection between the two more clearly than in most articles analysed for this study.

The elements of moral panic visible are mainly concern for shared cultural heritage and archaeological context, disproportion as to the importance of the trade, as well as a hope for a change in Germany's law. Also, as usual in the years 2014-2016, the terror group IS has to be mentioned at least once.

49 Title: Wenn mit Kulturerbe für Waffen bezahlt wird; Der illegale Kunsthandel als Geldquelle des Terrors im Nahen Osten

Publication: Neue Zürcher Zeitung (Internationale Ausgabe)

Date: 12. Februar 2015

Section: FEUILLETON

Author(s): Georges Waser

Article Genre:

Search Term Antikenschmuggel 18

Operational Research Questions:

Which words are used to describe *looting at source*?

- "Selbstbedienungsläden für Raubgräber und Plünderer" – "self-service shop for looters"
- Raubgrabungen

Which words are used to describe *the antiquities market and market actors*?

- "illegalen Handel" – "illegal trade"
- "internationalen Kunstmarkt" – "international art market"
- zirkulierten unter Händlern
- "dunklen Geschäften mit Kunst" – "dark deals with art"
- "bereichert" – "profited"
- "Schmuggel"
- "Hehlern, gewissenlosen Händlern und prahlerischen Sammlern" – fences, conscienceless dealers and vain collectors

Which words are used to describe *antiquities*?

- "Kulturerbe" (Title)
- specific: "mameluckischer Lampen"
- "illegal ausgegrabenen Antiken" – "illegally excavated antiquities"
- "seltene Artefakte" – "rare artefacts"
- "Keilschrifttafeln, Glasgefäße, Mosaiken und Statuen, Astrolabien, Schmuckstücke und Münzen aus allen Epochen der syrischen Geschichte" – specific, descriptive examples
- "Schmuggelware" – contraband
- "irakisches Raubgut" – "Iraqi loot"
- "Kunstgegenstände der Babylonier und Assyrer" – "art objects of the Babylonians and Assyrians"

Which devices are used to get/keep the reader's attention?

- introduction about looted art on the art market in general, not just ancient artefacts

- IS - but said to loot "among others"
- Unesco-Welterbestätten - appeal to world heritage

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- buyers, unequivocally (even "looting to order" is mentioned)
- Silsilla Trading LLC, Dubai
- bad laws in Germany
- auction houses (by name)

Which elements of moral panic are visible?

- IS "said to control 4500 archaeological sites in Iraq alone" – rumours, *disproportion*
- "mit stümperhafter Brutalität" "Meister der Zerstörung", "Gewaltherrschaft" – *hostility*
- "jene, die in Europa und den USA nach dem Motto «Mir ist alles recht, was in meine Sammlung passt» Antiken einkaufen, ohne nach der Herkunft zu fragen" – irony, mockery: *hostility*
- "Der Islamische Staat lässt sich von jenen subventionieren, denen seine Hasspredigten gelten, von den Kapitalisten des Westens. Wie nahe sind sich doch religiöser Fanatismus und Scheinheiligkeit." – *hostility*
- "amerikanische Importe allein von syrischem Kulturgut zwischen 2011 und 2013 um 145 Prozent gestiegen" – *disproportion?*
- "Hehlern, gewissenlosen Händlern und prahlerischen Sammlern" – *hostility*

Which orientalist tropes are used?

- "Krisenländern des Nahen Osten"
- brutal, uncouth terrorists

How is the *antiquities trafficking chain* constructed in this article?

- Artefacts "find their way" to Europe via Turkey – the article mentions the 900km border between Turkey and Syria, implying that it is hard to control smugglers from trespassing.
- trafficked through Turkey or Lebanon, laundered in Dubai (notably, Dubai is mentioned as a free haven, but not Geneva)
- to come to "the West", notably Munich and London

Main Research Question:

How is "Wenn mit Kulturerbe für Waffen bezahlt wird; Der illegale Kunsthandel als Geldquelle des Terrors im Nahen Osten" (Waser, 2015) framing the market for illicit Iraqi and Syrian antiquities in terms of a moral panic in early 2015?

This article from the Swiss newspaper *Neuer Zürcher Zeitung* starts with an unusual spin on illicit objects from conflict zones that are sold on the international art market, by including cases of Islamic antiques from Egypt and modern art objects, but then leads over to looted archaeological artefacts from Syria and Iraq. It is noted that all factions in the Syrian civil war have been looting archaeological sites to pay for their war efforts, but the IS's involvement is still described in more detail. The words in which the terror group is described show clear signs of contempt, consistent with the *hostility* of a moral panic. The same contempt is clear in the ways which describe the buyers of looted antiquities, called the driving force ("Triebfeder") of looting.

Then the article goes over to describe trafficking routes through Turkey and Lebanon to Dubai. It is noteworthy that Dubai is mentioned as a freehaven, but not Geneva in Switzerland, which was mentioned as such in a few other – German – newspaper sources. The Dubai company Silsilla Trading LLC is mentioned as laundering looted antiquities, with the author speculating whether they organise "looting to order". The numbers given for the rise in trade could be indicative of *disproportion*.

The next paragraphs deal with the market end of the consumer chain, discussing German import laws that are said to be lacking and auctions in London. The author notes a rise in Syrian and Iraqi artefacts on the antiquities market, and the custom of hacking large artefacts (such as Assyrian reliefs) into smaller, more transportable pieces. The words used for antiquities are largely along the lines of "cultural heritage" often with the Syrian and Iraqi national denominators, but also in terms of "common heritage", invoking UNESCO, or "Babylonians and Assyrians". Both shows a focus on *concern* about the destruction of heritage through antiquities trafficking. Another *concern*, expressed in the title and the last paragraph, is for the financing of the IS militia's terror acts, but it seems secondary in this piece.

The words used for the buyers especially in the concluding paragraph, again show clear *hostility*.

50 Title: Kulturerbe füllt Kriegskasse; Plünderung antiker Stätten in umkämpften arabischen Ländern erreicht beispiellose Dimension

Publication: Südwest Presse

Date: 24. February 2015

Section: Die vierte Seite

Author(s):

Article Genre: feature?

Search Term Antikenhehlerei 15

Operational Research Questions:

Which words are used to describe *looting at source*?

- "skrupellose Raubgräber"
- Antikenraub
- "Ausgräber und örtliche Mittelsmänner"

Which words are used to describe *the antiquities market and market actors*?

- Schmuggel antiker Kulturgüter aus Krisengebieten im Nahen Osten
- "der illegale Handel blüht" – the illegal trade is blooming
- "dunkle Geschäfte" – "dark deals"
- "Fundstücke verschwinden in reichen Privatsammlungen" – "finds disappear in wealthy private collections"

Which words are used to describe *antiquities*?

- antike Kulturgüter
- "36 wertvolle pharaonische Fundstücke im Wert von 300 000 Euro"
- Kulturgut

Which devices are used to get/keep the reader's attention?

- case intro with Egyptian antiquities and big IS reveal at the end.
- graphic descriptions, "feature-y" style

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- criminals: "ruthless looters" who use conflicts for "their sinister dealings"
- "professional" smugglers, "perfectly organised"

Which elements of moral panic are visible?

- "it has never been as bad as today"
- second most important source of income for IS
- 36 billion

Which orientalist tropes are used?

- smuggling antiquities from "Near Eastern crisis regions" is "traditional"
- biblical connections
- "Orient"

How is the *antiquities trafficking chain* constructed in this article?

- IS is looting, criminals and locals have been looting "for years"
- IS takes 20% looting tax
- professional smugglers take advantage of the situation and sell antiquities for IS
- antiquities leave Syria/Iraq through Turkey and Lebanon

Main Research Question:

How is "Kulturerbe füllt Kriegskasse" ('Kulturerbe Füllt Kriegskasse', 2015) framing the market for illicit antiquities in terms of a moral panic in 2015?

This piece is directly dealing with the illicit trade in antiquities from the MENA region and its connections to the terror group IS. The article is written in a quite alarmed tone, describing a perfectly organised criminal network taking advantage of political upheaval and armed conflict to sell looted antiquities for fabulous sums of money (the often-cited 36 billion dollars are mentioned here). In terms of moral panic, a clear sense of concern, if not alarmism, is visible here.

There is another sarcastic quote by Margarethe van Ess, or potentially, a different cutting from the same quote used before in another article: "Wenn man Kunsthändler fragt, haben sie nie ein Problem, denn sie handeln ja grundsätzlich mit sauberer Ware. Wenn wir aber Auktionskataloge beobachten, fällt auf, in welcher abenteuerlicher Masse alte Sammlungen aus dem Boden sprießen, von angeblichen Professoren und Kunstsammlern, von denen wir noch nie gehört haben" - "if you ask art dealers, they never have a problem because they always deal in clean antiquities. But if we look at auction house catalogues, you will notice the great mass of old collections springing up out of nowhere, from alleged professors and art collectors we never heard about" (rough translation).

51 Title: "Die eigentlichen Täter sind die Käufer"

Publication: Südwest Presse

Date: 24. February 2015

Section: Die Vierte Seite

Author(s):

Article Genre: Interview

Search Term Antikenschmuggel 19

Operational Research Questions:

Which words are used to describe *looting at source*?

- "Das Problem der Plünderungen"
- Raubgrabungen
- Plündern

Which words are used to describe *the antiquities market and market actors*?

- "illegalen Antikenhandel"
- "tauchen jetzt in westlichen Auktionshäusern auf" – surface in Western auction houses
- "Was in den Handel kommt, kann in aller Regel nur illegaler Herkunft sein."

- "Leute, die keine unangenehmen Fragen stellen" – people who do not ask uncomfortable questions

Which words are used to describe *antiquities*?

Which devices are used to get/keep the reader's attention?

- "Im Irak stand auf Antikenschmuggel die Todesstrafe"

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- buyers (quote in the title)
- "eine finanzkräftige und sehr einflussreiche Lobby"

Which elements of moral panic are visible?

- "verheerenden Situation", "Die Lage ist dramatisch" (MMK) – *concern*
- "Man sagt, der Handel mit geplünderten Antiken stehe auf einer Stufe mit dem Waffen- und Rauschgifthandel. In dieser Branche wird jährlich ein mehrstelliger Milliarden-Dollar-Betrag umgesetzt." (MMK) – *disproportion*
- lobbyists with access to political actors

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

- looting has become more severe through recent conflicts
- export is illegal, but the supply is higher than ever
- antiquities are hidden for a few years before sale
- most antiquities on sale have been exported illegally

Main Research Question:

How is the interview "Die eigentlichen Täter sind die Käufer" ('Die eigentlichen Täter sind die Käufer', 2015) with Michael Müller-Karpe framing the market for illicit Iraqi and Syrian antiquities in terms of a moral panic in 2015?

This interview with archaeologist Michael Müller-Karpe is written so as to give background and raise concern on the problem of antiquities trafficking in Iraq and Syria. While in the same vein as some other articles that quote him, Müller-Karpe is cited in more objective tones here, explaining the antiquities trafficking chain, while stressing that most antiquities on the market have left their country of origin illegally. Words like "verheerend" and "dramatisch" make clear that the situation is dire, which is consistent with a state of *concern*. He lays the blame on the buyers of antiquities, whom he attests "a wealthy and influential lobby with political access", which seems to imply a threat to society (lobbyists and corruption) even "here", consistent with a moral panic following

Cohen. The last answer suggests the hope that the planned new law will help the situation in Germany, but also concern that antiquities dealers will use their lobby power to make it ineffective. The framing suggests a state of concern for heritage, but also the "good conscience" of German citizens. Generally, the piece has a much more subtle tone than some older articles and interviews, certainly to do with the fact that this is a different publication and interviewer. It is still somewhat confusing, that the moral panic seems to have "jumped back" a step in this text.

52 Title: "Wetlauf mit der Zeit"; Deutschland ist zur Drehscheibe für den Handel mit Raubkunst geworden. Terroristen des IS finanzieren damit ihre Feldzüge

Publication: Die ZEIT

Date: 26. February 2015

Section: WISSEN SPEZIAL

Author(s): Eva Lindner

Article Genre: Interview

Search Term Antikenhehlerei 16

Operational Research Questions:

Which words are used to describe *looting at source*?

- "verbotenerweise aus dem Boden hole" – "illegally take out of the ground"
- Funde aus Raubgrabungen – "finds from looting"
- geplündert und außer Landes geschmuggelt
- In Syrien fahren sie mit Bulldozern durch archäologische Stätten. – "In Syria, they go through ancient sites with bulldozers"

Which words are used to describe *the antiquities market and market actors*?

- im Handel

Which words are used to describe *antiquities*?

- "antike Kunst" – "ancient art"
- "Objekte" – "objects (MMK)"
- archäologischen Funde
- Antiken
- illegal erlangter Antiken
- archäologischen Erbe der Menschheit

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- lax laws and antiquities dealers

Which elements of moral panic are visible?

- concern
- six to eight billion dollar or more - *disproportion*
- call for a change in law with specific criticism

Which orientalist tropes are used?

- cradle of civilisation
- IS
- "Archiven der Menschheit" – archive of humanity

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Wettlauf mit der Zeit" (Lindner, 2015) framing the market for illicit antiquities in terms of a moral panic in 2015?

Another interview with Michael Müller-Karpe, about problems with the then-current cultural property legislation in Germany (only antiquities from official lists are protected, which makes all looted antiquities effectively unprotected). Müller-Karpe ironically mentions the notorious "Swiss private collections" and calls for a law that makes the trade of archaeological objects illegal unless their legality can be proven. There is a sense of concern for archaeological context and knowledge. There is also a section on IS and the supposed 6-8 billion dollar figures they make from taxing antiquities looting in their territory.

53 Title: Zerstörung für die Propaganda, Schmuggel für die Kriegskasse

Publication: ZEIT online

Date: 27. February 2015

Section: "Islamischer Staat"

Author(s): Martin Gehlen

Article Genre:

Search Term Antikenhehlerei 17

Operational Research Questions:

Which words are used do describe *looting at source*?

- plündern, plünderungen
- Antikenraub – "antiquities theft"
- Frevel – "sacrilege"
- unersetzliche Kulturgüter – "irreplaceable cultural goods"

Which words are used to describe *the antiquities market and market actors*?

- illegale Handel
- spezialisierte Hehlerringe – "specialised fence rings"
- "skrupellosen Kunden in Europa, den USA und den Golfstaaten" – "unscrupulous buyers"

Which words are used to describe *antiquities*?

- unersetzliche Kulturgüter – "irreplaceable cultural goods"
- einzigartige assyrische Statuen – "unique Assyrian statues"
- zerstörten Relikte – "destroyed relics"
- Ausstellungsstücke – "exhibits"
- kulturellen Erbe – "cultural heritage"
- vorislamischen Schätze Syriens und Mesopotamiens – "the pre-Islamic treasures of Syria and Mesopotamia"
- geraubten Fundstücke

Which devices are used to get/keep the reader's attention?

- terrorism

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- IS, mainly
- but also global trafficking networks
- and "unscrupulous buyers"

Which elements of moral panic (Cohen, 2002, Goode and Ben-Yehuda, 2009) are visible?

- "billions of dollars" this time by a jihadist
- second source of income
- 36 billions - disproportion
- unscrupulous buyers - hostility

Which orientalist tropes are used?

- the barbaric Islamist terrorist vs. the sophisticated (pre-islamic) ancient artefacts
- Mesopotamia

Main Research Question:

How is "Zerstörung für die Propaganda, Schmuggel für die Kriegskasse" (Gehlen, 2015a) framing the market for illicit antiquities in terms of a moral panic in 2015?

This is again about IS selling antiquities. One interesting phrasing is the word "Frevel" ("sacrilege") applying almost religious terminology to the destruction wrought by the terrorists, thus giving antiquities a sacred quality.

The rest is a lot more of what has been said before. Examples of destruction cited mostly concern Assyrian artefacts. Most notable again is the disproportion of the sales figures, and the concern for "unique" and "irreplaceable" cultural goods. There is also a clear disdain visible for everyone involved in the trafficking chain, from the local "looters" to "unscrupulous buyers" and their "middlemen" – all described with loaded terms clearly indicating criminality. Thus, there is a sense of *hostility*, not only for the IS terrorists. The general tone is also more than slightly orientalist.

54 Title: Kunstraub finanziert Terror

Publication: Die Presse (Austria)

Date: 28. February 2015

Section: Inland

Author(s): Martin Gehlen (?)

Article Genre:

Search Term Antikenhehlerei 19

Operational Research Questions:

Which words are used to describe *looting at source*?

- Plünderer
- Frevel – "sacrilege" again

Which words are used to describe *the antiquities market and market actors*?

- Antikenhehlerei – "antiquities fencing"
- spezialisierte Hehlerringe – "specialised fence rings" again
- global vernetzte Kunstmafia – "globally connected art mafia"

Which words are used to describe *antiquities*?

- Kleinere Ausstellungsstücke

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- IS
- criminal market actors ("art mafia")

Which elements of moral panic are visible?

- second most important source of income for IS – disproportion

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Kunstraub finanziert Terror" (Gehlen, 2015c) framing the market for illicit antiquities in terms of a moral panic in 2015?

Another piece on the same topic within a short time frame, this is from the Austrian newspaper "Die Presse". It seems to be another iteration of the last article, using the same phrases about the "sacrilege" of looting, "porous borders to Turkey and Lebanon", "specialised rings of traffickers" etc. The same quotes by Michael Danti that have been used several times before (from 2014 onwards) are also present. There is no byline; but it seems reasonable to assume the author is Martin Gehlen again.

55 Title: Geraubte Kunst füllt die Kriegskasse; Tagesthema

Publication: Stuttgarter Zeitung

Date: 28. February 2015

Section: SEITE 1; Tagesthema

Author(s): Martin Gehlen

Article Genre: Title story

Search Term Antikenhehlerei 18

Operational Research Questions:

Which words are used to describe *looting at source*?

- Plündern
- Frevel

Which words are used to describe the *antiquities market and market actors*?

- global vernetzte internationale Kunstmafia

Which words are used to describe *antiquities*?

- "Geraubte Kunst" - title
- Kunstwerke - teaser

Which devices are used to get/keep the reader's attention?

- featurette opening story with graphic descriptions of destruction/propaganda

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- jihadists and international trafficking rings "art mafia"

Which elements of moral panic are visible?

- concern
- disproportion
- hostility

- appeal to UNESCO resolutions

Which orientalist tropes are used?

- barbaric terrorists vs. civilised pre-islamic art

How is the *antiquities trafficking chain* constructed in this article?

- a professional organised crime empire IS feeds into

Main Research Question:

How is "Geraubte Kunst füllt die Kriegskasse" (Gehlen, 2015b) framing the market for illicit antiquities in terms of a moral panic in 2015?

This article was published within a day of the last two, by the same author, in another newspaper, and is, while a little bit longer, in parts verbatim the same. Clearly the teaser and title have been written by another person in the editing office and/or for a different audience, as, unlike in the ZEIT piece, the terms used for destroyed artefacts are along the lines of "art" instead of "cultural heritage". In the main article, the phrasing is more in the realm of cultural heritage again.

56 Title: UNESCO verabschiedet Erklärung gegen Zerstörung von Kulturerbe

Publication: SDA Basisdienst

Date: Montag 29. Juni 2015

Section: -

Author(s): -

Article Genre: Short News

Search Term Antikenschmuggel 20

Operational Research Questions:

Which words are used to describe *looting at source*?

Which words are used to describe *the antiquities market and market actors*?

Which words are used to describe *antiquities*?

- Kulturerbe

Which devices are used to get/keep the reader's attention?

- IS

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "UNESCO verabschiedet Erklärung gegen Zerstörung von Kulturerbe" (SDA, 2015a) framing the market for illicit IRAQI and SYRIAN antiquities in terms of a moral panic in 2015?

This is a short news about the UNESCO declaration against the destruction of cultural heritage. It can be seen as part of this moral panic mainly because it mentions IS and cites an appeal to curb the trade in trafficked antiquities. Also note that there is a 4-month gap since the last article on this topic.

57 Title: UNESCO verurteilt "barbarische Angriffe" gegen Kulturstätten

Publication: SDA - Basisdienst Deutsch

Date: 29. June 2015

Section:

Author(s): Schweizerische Depeschagentur AG (SDA)

Article Genre: Report

Search Term Antikenschmuggel 21

Operational Research Questions:

Which words are used to describe *looting at source*?

Which words are used to describe *the antiquities market and market actors*?

- "Sammler [...] mitschuldig an der Kultur-Barbarei" – "collectors complicit in cultural barbarism"
- "Antikenschmuggel aus dieser Region" – "antiquities smuggling from this region"
- "illegalen Kulturgüterhandel"
- Auktionshäuser und Sammler

Which words are used to describe *antiquities*?

Which devices are used to get/keep the reader's attention?

- war crimes

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- market actors (partly)
- IS

Which elements of moral panic are visible?

- concern

Which orientalist tropes are used?

- "cultural barbarism"

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "UNESCO verurteilt "barbarische Angriffe" gegen Kulturstätten" (SDA, 2015b) framing the market for illicit Iraqi and Syrian antiquities in terms of a moral panic in 2015?

This is a short article about the Bonn declaration against the destruction of cultural heritage, connected with the last. It starts with the destruction of heritage sites by IS, the leads over almost seamlessly to antiquities trafficking. UNESCO official Maria Böhmer is quoted as saying that the proceeds of looted (Iraqi and Syrian) antiquities are used in terror financing. There is a clear *concern* visible as a sign of moral panic, especially in the connection of antiquities trafficking with terror financing.

The second part of the article deals with rescued manuscripts in Mali and the lack of sufficient UNESCO aid funds. The article ends on the note that UNESCO's financial means fall short of its needs. This as well may be seen as an expression of *concern* in the context of a moral panic dealing with the loss of cultural heritage worldwide.

58 Title: Kandidaten für das Weltkulturerbe

Publication: Rheinische Post

Date: 30. June 2015

Section: KULTUR

Author(s): Franziska Hein, Bertram Müller

Article Genre:

Search Term Antikenschmuggel 22

Operational Research Questions:

Which words are used to describe *looting at source*?

Which words are used to describe *the antiquities market and market actors*?

- "Antikenschmuggel"
- "auch Auktionshäuser und Sammler" – "also auction houses and collectors"

Which words are used to describe *antiquities*?

- "Kulturschätze" – cultural treasures

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- IS, auction houses, and collectors

Which elements of moral panic are visible?

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

- IS financed through antiquities trafficking (no other sources of income mentioned)

Main Research Question:

How is "Kandidaten für das Weltkulturerbe" (Hein & Müller, 2015) framing the market for illicit Iraqi and Syrian antiquities in terms of a moral panic in 2015?

This is another piece on the Bonn UNESCO conference, from just one day later. It deals with potential nominations for the world heritage title, as well as the destruction of heritage in Syria, Iraq, and Yemen, with a special attention on Palmyra.

The same statements are quoted in regards to the alleged terror financing through antiquities trafficking and in this sense, the article can be seen as framing the illicit market in the early stage of a moral panic. As the previous article, this one then also leads over to the rescue of manuscripts in Timbuktu, with a slightly more positive tone.

The authors then express some hope for post-war reconstruction, citing an example from Bosnia. However, they remind readers in the last sentence, that the war is far from over in "the Near East".

59 Title: Schlangen im Grab

Publication: DER SPIEGEL

Date: 8. August 2015

Section: DEUTSCHLAND

Author(s): Michaela Schießl

Article Genre: Book review

Search Term Antikenschmuggel 23

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabungen und Plünderungen

Which words are used to describe *the antiquities market and market actors*?

- "illegale Handel mit archäologischem Kulturgut" – "illegal trade in archaeological cultural property"
- "Antikenhändler"
- "Galerist"
- "Kunstschieber" – back marketeers in art
- "illegalen Kunsthandels" – illegal art trade
- "mafiöse Strukturen" – "mafia-like structures"

Which words are used to describe *antiquities*?

- cultural property
- "ein kleines, feines Stück Geschichte" – a neat little piece of history
- "Kleinod" – treasure
- "archäologische Kunst" – archaeological art
- "unrechtmäßig hergebrachtes Kulturgut" – unlawfully brought cultural goods
- "schmutzige Ware" – "dirty goods"

Which devices are used to get/keep the reader's attention?

- case study intro
- mentions IS
- lots of emotive adjectives

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- too lax German laws

Which elements of moral panic are visible?

- "Milliardengeschäft" - disproportion
- "7 bis 15 Milliarden Dollar pro Jahr"
- too lax laws - concern, demand for social change

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Schlangen im Grab" (Schießl, 2015) framing the market for illicit antiquities in terms of a moral panic in 2015?

This is a book review of Günther Wessel's "Das schmutzige Geschäft mit der Antike." The opening paragraph deals with the planned amendment of the cultural property protection law. It can be clearly seen here that there is concern about the state of laws as is, noting that since the first cultural property restitution law from 2008, not one unprovenanced antiquity had been given back. The hook for this longer read is the release of Wessel's book about antiquities trafficking. Quoting Wessel, the author describes the antiquities trafficking supply chain as a "mafia-like" structure. The numbers given for the revenue of antiquities trafficking are disproportionate, consistent with a moral panic. Wessel's book was clearly a timely publication in the summer of 2015.

60 Title: Die Beute des Abu Sajjaf

Publication: DIE ZEIT

Date: 26. November 2015

Section: FEUILLETON

Author(s): Günther Wessel

Article Genre: Reportage

Search Term Antikenschmuggel 24

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabungen
- "Plünderungen, Raubgrabungen und Zerstörungen"
- in-depth description by Danti

Which words are used to describe *the antiquities market and market actors*?

- "zum Verkauf bestimmte Antiken"
- "illegalen Handel mit Kulturgütern"

Which words are used to describe *antiquities*?

- "Kultur" - culture, as a whole
- Kunstwerke - artworks
- archäologische Artefakte aus Museen und Raubgrabungen

Which devices are used to get/keep the reader's attention?

- Intro about atrocities, incl. Khaled al-Asaad murder
- introducing Hilgert/ILLICID to draw back to Germany?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- IS
- lax laws

Which elements of moral panic are visible?

- "krude Glaubensvorstellungen" (hostility towards IS)
- a change in laws (Stage 5?)
- question if that is enough (concern)

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

- IS have a ministry for antiquities of sorts, that organises looting and trafficking
- licenses and taxes
- loot in free ports, potentially for years
- unclear how much money is made
- sloppy provenances

Main Research Question:

How is "Die Beute des Abu Saffar" (Wessel, 2015) framing the market for illicit SYRIAN antiquities in terms of a moral panic in 2015?

The author of this piece is the journalist Günther Wessel, who also authored the book "Das schmutzige Geschäft mit der Antike", published in August of that year (reviewed in the last article). It is an in-depth report on the then recently published Abu Sayyaf bust. He quotes a few experts and activists, including Michael Danti from Antiquities Coalition, Neil Brodie, as well as Markus Hilgert, in maybe the first reference to ILLICID. This note also draws the focus of the article towards Germany somewhat. The article then mentions the KGSG, which at the time was accepted in its early form by the German cabinet, but still needed approval by the Bundesrat (one chamber of the German parliament). There is a clear sense of relief that legal changes are enacted in the quotes, but also concern whether the new law is enough, and an appeal to enact even greater change. The tone of the article is generally less hostile and agitated than in articles on the same topic from one year earlier, e.g. there are no disproportionate figures given for the revenue of antiquities trafficking, instead, it outlines what can be proven. This may suggest a moral panic already dying down, with social changes having been enacted.

61 Title: "Ein neues Bewusstsein"; Jean-Luc Martinez, Direktor des Pariser Louvre, über den Schutz von Kunst aus Kriegsgebieten

Publication: Süddeutsche Zeitung

Date: 28. December 2015

Section: FEUILLETON

Author(s): Joseph Hanimann

Article Genre: Interview

Search Term Raubgrabung 18

Operational Research Questions:

Which words are used to describe looting at source?

- Raubgrabung und Schwarzhandel – "looting and black marketeering"

Which words are used to describe *the antiquities market and market actors*?

- Museumsdirektoren auch gute Kenner und wichtige Akteure im Bereich des Kunsthandels – "museum directors are also experts and important actors in the art trade"
- Handel mit Antiken
- Vertreter der Auktionshäuser, Wissenschaftler und Museumsleuten
- "Schwarzhandels oder des Handels in der Grauzone" – black or grey market

Which words are used to describe *antiquities*?

- Kunst aus Kriegsgebieten – "art from conflict zones"
- Weltkulturerbe – "world heritage"
- archäologische Kulturgüter – "archaeological cultural goods"
- Kulturgüter
- Handschriften, wertvollen Bauwerken und sonstigen Kulturschätzen – "manuscripts, buildings, and other cultural treasures"
- Kunstgütern – art
- Objekten
- vom französischen Zoll beschlagnahmte Kunstobjekte – "art objects seized by French customs"
- Kunstwerke

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

- call for better (more universal) laws and stricter controls

Which orientalist tropes are used?

- world heritage - but discussed by interviewee

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Ein neues Bewusstsein" (Hanimann, 2013) framing the market for illicit antiquities in terms of a moral panic in 2015?

This is an interview with then Louvre director Jean-Luc Martinez about the threat to cultural heritage in Syria. Notably, he is very upfront about the fact that museums have close dealings with the art market, which poses a risk to cultural heritage, not quite going so far as to hint at a direct implication. There is a discussion about the "Western" view on what constitutes "world heritage" and a few ideas on how to avoid this myopic definition. "Man muss den Verdacht vermeiden, hier würden westliche Vorstellungen darüber durchgesetzt, was als Weltkulturerbe schützenswert sei." There is a mild sense of *concern*, as well as a call for better laws and stricter controls, but all in all the tone is rather calm, even optimistic. It might be notable that the then newly-appointed Louvre director Martinez has by now been removed from this post as he was implicated in antiquities trafficking himself.

62 Title: Geraubtes Erbe Zur Kulturgutschutz-Debatte: Günther Wessel über illegalen Antikenhandel

Publication: Südwest Presse

Date: 29. Dezember 2015

Section: Feuilleton

Author(s):

Article Genre:

Search Term Antikenschmuggel 25

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabungen
- "blanke Not der armen Bauern" – "suffering of poor farmers"
- Grabungslöchern in der Wüste – "looting holes in the desert"
- Ausgrabungsstätten umgepflügt – "ploughed through sites"

Which words are used to describe *the antiquities market and market actors*?

- "Selbst ein Händler mit internationalem Renommee kann ein Schmuggler sein." – contrast: even an internationally respected dealer can be a smuggler

Which words are used to describe *antiquities*?

- das 1300 Jahre alte Stück
- "Eines der absoluten Spitzenstücke unter den erhaltenen kashmirischen Kunstobjekten" (Kunstministerium) hatte sich als Schmugglerware entpuppt – first focus on art and beauty, then illegal status ("top piece", "kashmiri art work", "contraband")
- Antiken
- Kulturgut

Which devices are used to get/keep the reader's attention?

- case study intro (about Indian idol bought from Subhash Kapoor)

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- IS
- the market?

Which elements of moral panic are visible?

- "hitze Debatte", "gegen den wütenden Protest der Branche", "beispiellos zerrissen" – a controversial debate, against the angry protest of the trade, unparalleled divide
- lax laws strain relations with source countries – concern

- antiquities might be used for terror financing – concern

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

- anything that is offered for sale might be looted
- poor farmers, but also organised gangs loot, sometimes "to order"
- IS takes taxes
- ancient cultures do not align with modern borders, which makes it easy to obfuscate provenience

Main Research Question:

How is "GERAUBTES ERBE" ('Geraubtes Erbe; Zur Kulturgutschutz-Debatte: Günther Wessel Über Illegalen Antikenhandel', 2015) framing the market for illicit antiquities in terms of a moral panic in 2015?

This article starts with a case study about an Indian idol the Linden Museum Stuttgart bought from Subhash Kapoor in 2000, giving the readers of the paper a local hook. Effectively it contains another review on Wessel's book in light of the "heated debate" on the new law KGSG, as the author describes it. The piece also references the last article discussed in this study, with the conclusion that the evidence for a lot of antiquities on the market being looted is overwhelming, despite dealer protest. Many emotive adjectives are used to describe the debate about the law amendment.

The descriptions of looted heritage sites are still rather dramatic, but the general tone of the article is far more dispassionate than most articles on the topic in 2014 or early 2015.

63 Title: "Empörung ist unglaublich"; Der IS finanziert sich auch über den Verkauf von Raubkunst - Der Kriminalarchäologe Michael Müller-Karpe wirft Politik und Justiz in Deutschland mangelnde Sensibilität vor

Publication: Kölner Stadt-Anzeiger

Date: 30. December 2015

Section: S. 3

Author(s): Thomas Geisen

Article Genre: Interview

Search Term Raubgrabung 19

Operational Research Questions:

Which words are used to describe *looting at source*?

- kommerziellen Ausbeutung der archäologischen Stätten - "exploitation of archaeological sites for profit"
- Plünderer
- Raubgrabungen
- Plünderer und skrupellose Händler – "looters and unscrupulous dealers"
- Raubgräbern

Which words are used to describe *the antiquities market and market actors*?

- Verkauf von Raubkunst – "sale of looted art"
- Vermarktung von geplünderten Antiken – "marketing plundered antiquities"
- Käufer von Antiken ungeklärter Herkunft – "buyers of unprovenanced antiquities"
- Drehscheibe für den Handel mit Raubkunst – "trade hub for looted antiquities"
- Antikenhandel
- durchsetzungsstarken Lobby
- "Gemeinschädlichkeit des Handels mit Antiken ungeklärter Herkunft" – "the criminal nature of trading antiquities without clear provenance"
- Käufer, die keine unangenehmen Fragen stellen – "buyers who don't ask uncomfortable questions"
- Kunsthandelsszene – "art market scene"
- Kunsthändler
- Wer auch weiterhin Antiken ungeklärter Herkunft verkaufen will – "who wants to continue selling unprovenanced antiquities"
- kunstsinnigen Terrorfinanciers – "artsy terror financiers"
- "Kein gewinnorientiertes Unternehmen wäre lebensfähig, wenn es ausschließlich mit Antiken nachweislich legaler Herkunft handelte." – "no profit-oriented business would survive, if it only traded antiquities of provable legal provenance."

Which words are used to describe *antiquities*?

- Raubkunst – "looted art"
- Antiken – "antiquities"
- Objekt
- unerlaubt ausgeführtes Kulturgut – "unlawfully exported cultural property"
- geplündertem irakischem Kulturgut – "plundered Iraqi cultural property"

Which devices are used to get/keep the reader's attention?

- IS, casually thrown in "women trafficking" (intro)

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- lazy and incompetent German authorities
- "Hehlerschutz- und Raubgrabungsförderungsgesetz" - the law
- the international/German antiquities market "artsy terror financiers"
- criminals and terrorists, but to a lesser extent

Which elements of moral panic are visible?

- hostility (against dealers, but also authorities)
- concern (for cultural heritage)
- criticism of laws

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

- Demand for antiquities gives financial incentive for looting
- poor locals loot to feed their families
- IS loans claims to looters and takes taxes on finds.
- international networks bring loot to freeports
- lazy/incompetent authorities look away
- In Germany, a powerful lobby of art/antiquities dealers prevents better legislation to stem the trade in illicit antiquities from conflict zones.
- Unquestioning buyers buy looted artefacts.

Main Research Question:

How is "Empörung ist unglaublich" (Geisen, 2015) framing the market for illicit antiquities in terms of a moral panic in 2015?

This is an interview with Michael Müller-Karpe about the IS-antiquities implication. Müller-Karpe promises a crate of beer to anyone who can show him an antiquity for sale on the open market with a proven legal provenance. He criticises the old cultural protection law and the new, planned one as well and explains the antiquities trafficking chain, generally, not only linked to terrorism.

He calls out hypocrisy by Germans who in his view are condemning destruction by terrorists, while at the same time unable or unwilling to stem the demand for illicit antiquities at home. There is a sense of *concern*, but mostly scorn for law and law enforcement, as well as a powerful lobby of antiquities dealers, which must be interpreted as *hostility*.

2016-2017

64 Title: Alles in Scherben; Der Bundestag berät über die Neufassung eines Gesetzes, das Kulturgut schützen soll.

Publication: Süddeutsche Zeitung

Date: 18. February 2016

Section: FEUILLETON

Author(s): Jörg Häntzschel

Article Genre: Interview

Search Term Raubgrabung 20

Operational Research Questions:

Which words are used to describe *looting at source*?

- illegal ausgegraben – "illegally excavated"
- Raubgrabungen
- "Luftaufnahmen von archäologischen Stätten [...] sehen aus wie Mondlandschaften, wie Schlachtfelder des Ersten Weltkriegs" – "aerial photographs of archaeological sites [...] look like moonscapes, like battlefields of the First World War"
- vollständige Vernichtung – complete destruction
- "Archäologische Funde kommen nicht aus Familienbesitz, sondern seit 1869 aus Raubgrabungen." – "archaeological finds do not come from family estates, but since 1869 from looting."
- 30 Jahren Plünderung
- Frevel – "sacrilege" again!

Which words are used to describe *the antiquities market and market actors*?

- Handel mit illegal ausgegrabener antiker Kunst
- illegalen Handel mit Antiken
- Geschäft mit Raubgrabungen – business of looting
- Handel mit illegal ausgegrabenen Antiken – trade in illegally excavated antiquities
- Hehlerei mit Antiken – "fencing antiquities"
- Handel mit Objekten zweifelhafter Herkunft – "trade in objects of dubious provenance"
- "Im Irak etwa gibt es seit 1869 ein Grabungsverbot, ein Exportverbot, eine Meldepflicht für Zufallsfunde. Ohne amtliches Dokument hat seit 1869 nicht ein einziges archäologisches Objekt den Irak, Syrien oder die Türkei mehr legal verlassen."

Which words are used to describe *antiquities*?

- Kulturgut
- antike Kunst – "ancient art"
- Antiken
- Objekte
- Funde aus Raubgrabungen
- eine frisch in Syrien ausgegrabene Vase – "a vessel freshly excavated in Syria"
- archäologischen Objekts
- geplündertem Kulturgut – "plundered cultural property"
- in Deutschland geplünderten Antiken
- Raubgrabungsfunde

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- bad laws (in part)
- the market ("Die Raubgrabungen hören nicht auf, solange der Handel weitergeht.")

Which elements of moral panic are visible?

- concern (about laundering antiquities)
- criticism of the law and law enforcement
- hostility toward the market
- hostility toward metal detectorists/looters (in Germany)

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

- The market creates a demand filled by countries in turmoil, which are not able to save their cultural heritage effectively. Customs do not have the capacities to control fake import licenses, laws are inefficient to control the trade.

Main Research Question:

How is "Alles in Scherben" (Häntzschel, 2016) framing the market for illicit antiquities in terms of a moral panic in 2016?

This is an interview with Michael Müller-Karpe, in which he criticises the planned amendment of the cultural property law in Germany. His main point of criticism is the 2007 cut-off date for antiquities, which effectively amounts to a way of laundering illicit antiquities that have entered Germany before 2007. He also criticises that there is no export ban on antiquities looted in Germany itself. While the law is ineffective, he says that the Getty scandal has had an effect on museums (if not dealers). In terms of moral panic, we see *concern* for archaeological context and

heritage, as well as sharp criticism of German lawmakers, law enforcement, and the antiquities market (bordering on *hostility*).

65 Title: Auch Kunst braucht einen Pass; Eckart Köhne, Präsident des Deutschen Museumsbundes, über Raubgrabungen und Kulturgutschutz

Publication: Der Tagesspiegel

Date: 22. February 2016

Section: KULTUR

Author(s): Nicola Kuhn

Article Genre: Interview

Search Term Raubgrabung 21

Operational Research Questions:

Which words are used to describe *looting at source*?

- illegalen Grabungen

Which words are used to describe *the antiquities market and market actors*?

- Kunsthandel – "art market"
- Connaisseur und Händler – "connaisseur and dealer"
- Wer in den siebziger, achtziger Jahren archäologische Objekte kaufte, konnte wissen, dass viele davon nicht legal ausgeführt waren. – "If someone bought archaeological objects in the 1970s or 80s, they could have known that many of them were not exported legally"

Which words are used to describe *antiquities*?

- archäologisches Kulturgut "archaeological cultural property"
- Objekte
- ein Stück aus einer Raubgrabung

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Auch Kunst braucht einen Pass"(Kuhn, 2016a) framing the market for illicit antiquities in terms of a moral panic in 2016?

This is another interview about the law amendment, this time with the president of the German Museum association, Eckart Köhne. For the most part, it is about fine art, e.g. Warhol paintings in German museums. Köhne calls for a "provenance passport" for art and cultural objects. There is a call for better transparency, which Köhne hopes the new law will bring, especially with regards to archaeological artefacts. He notes that "German museums do not have a good reputation when it comes to archaeology".

66 Title: Koalition der Gleichgültigen

Publication: Der Tagesspiegel

Date: 11. April 2016

Section: KULTUR

Author(s): Nicola Kuhn

Article Genre: Interview

Search Term Antikenhehlerei 21

Operational Research Questions:

Which words are used to describe *looting at source*?

- für den Handel beiseite geschafft – "put aside for the market"
- Vermarktung von geplündertem Kulturgut – marketing plundered cultural property

Which words are used to describe *the antiquities market and market actors*?

- von Händlerseite
- Antiken ungeklärter Herkunft hierzulande völlig ungeniert kaufen – "shamelessly" buying unprovenanced antiquities in Germany
- weltweiten Markt für Antiken unbekannter Herkunft [...], den Terroristen und andere Kriminelle nutzen können – "international market for unprovenanced antiquities [...], that terrorists and other criminals can use"
- Käufer [...], die keine unangenehmen Fragen stellen und denen es egal ist, dass sie mit ihren anrühigen Geschäften Kulturzerstörung und unter Umständen auch Terroranschläge [...] mitfinanzieren – buyers funding cultural destruction and perhaps terror attacks

Which words are used to describe *antiquities*?

- Kulturgut (MMK)
- Antiken ungeklärter Herkunft (MMK) - unprovenanced antiquities
- Blutantiken (MMK) - blood antiquities

Which devices are used to get/keep the reader's attention?

- Was erwarten wir denn? Dass an den Blutantiken ein adrettes Schildchen hängt: "Mit freundlichen Empfehlungen von Ihrem Islamischen Staat"? - sarcasm (MMK)
- nod to the terror attacks in Paris and Brussels
- "blood antiquities"

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- Dealers and buyers, also terrorists and "other criminals": essentially, the market
- bad laws

Which elements of moral panic are visible?

- gesicherte Erkenntnisse, dass sich Terrororganisationen auch über die Vermarktung von geplündertem Kulturgut finanzieren (*disproportion, concern*)
- Kulturzerstörung: *concern*
- "blood antiquities", "shady business", etc.: *hostility*
- Nach anderen Schätzungen hat der Antikenhandel den Waffenhandel sogar schon von Platz zwei verdrängt - *disproportion*, now antiquities is even the second-largest illegal market
- in aller Regel nur aus krimineller Quelle stammen können

Which orientalist tropes are used?

- terrorism

How is the *antiquities trafficking chain* constructed in this article?

- Looted antiquities are sold without provenance, seemingly legal in Germany, shielded by international market actors, to buyers who do not ask "awkward questions"

Main Research Question:

How is "Koalition der Gleigültigen" (Kuhn, 2016b) framing the market for illicit antiquities in terms of a moral panic in 2016?

This piece is another interview with Michael Müller-Karpe. He denounces the trade in unprovenanced antiquities ("Antiken unbekannter/ungeklärter Herkunft") as a generally criminal activity, a potential source of income for terrorism and a reason for the destruction of cultural heritage. He draws the connection to the terror attacks of Paris and Brussels and cites estimates, that antiquities trafficking is the second-largest illegal market. Ultimately, he holds buyers "who do not ask awkward questions" responsible for heritage loss and criminal activities. Müller-Karpe also denounces the then current law of 2008 as ineffective, with a clear hope that the new law will change the situation for the better.

His choice of words towards the market and market actors shows a clear sense of *hostility*. There is also a sense of *concern*, both about heritage loss and about terrorism and transnational crime. However, he makes it clear that there is no help to be expected from the side of the art market.

67 Title: House of Charts;

Publication: Die Welt

Date: 15. April 2016

Section: KULTUR

Author(s): Lucas Wiegelmann

Article Genre:

Search Term Antikenschmuggel 26

Operational Research Questions:

Which words are used to describe *looting at source*?

Which words are used to describe *the antiquities market and market actors*?

- "der Münzexperte" (coin expert, about Kristian Nicol Worbs)
- Schwarzhandel und Antikenschmuggel
- "experts" - the "expert witnesses" including anyone from artist to archaeologist
- "ehrliche Händler" vs. "unehrliche Händler" - dichotomy of legal vs illegal trade

Which words are used to describe *antiquities*?

- a lot about coins...
- "Kulturgüter"

Which devices are used to get/keep the reader's attention?

- scenic retelling of the assembly's end

Which words describe the lawmaking process

- "ganz schwere Geburt" – complicated birth
- "Mammutsitzung" – mammoth session

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

- "viele Künstler, Händler, Museumsleiter und Sammler entsetzt reagiert" – concern, disproportion
- sarcastic tone towards Grütters – hostility (and sexism)

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

- "Herkunftsland" – "country of origin" in quotes
- Pro-KGSG experts: unnamed, non-descript, anti-KGSG: partly named, described with titles

Main Research Question:

How is "House of Charts" (Wiegelmann, 2016) framing the market for illicit antiquities in terms of a moral panic in 2016?

This is a feature on an expert meeting before the final adoption of the KGSG in 2016. The piece heavily leans toward the side of antiquities dealers and artists who (for different reasons) opposed the amendment. There is next to no discussion of antiquities trafficking.

The author puts the term "Herkunftsland" – "country of origin" in quotation marks. This might suggest a rejection of the idea that any country can have a claim on cultural property, but could also simply reflect a direct quote from the law text, as with several other terms in the piece. Later it is made a bit clearer that the author thinks the term "country of origin" is insufficiently defined.

The claim that "many artists, dealers, museum directors and collectors" were "shocked" by the new law is especially notable here, as it frames the discussion in a way that suggests this is a law pretty much universally rejected by anyone it applies to.

Only three unnamed "experts", whose fields of expertise or credentials are not explained are described as being on the side of the law, while the opponents of the law amendment are described with credentials and partly even by name. The author adds an unnecessary reference to state secretary of culture Monika Grütters' hairstyle and mannerisms. This type of paternalistic sexism is not new or unusual in German news reporting and reflects on the style of Die Welt, a conservative-leaning paper published by Axel Springer Verlag.

68 Title: Mafiöse Strukturen im deutschen Antikenhandel;

Publication: Südwest Presse

Date: 6. May 2016

Section: DIE VIERTE SEITE

Author(s):

Article Genre: Interview

Search Term Antikenhehlerei 20

Operational Research Questions:

Which words are used to describe *looting at source*?

- Vermarktung von Antiken aus Raubgrabungen – "marketing looted antiquities"

Which words are used to describe *the antiquities market and market actors*?

- völlig ungeniert verkauft – "shamelessly sold" again

- Händler, die so die Kriegskasse von Terroristen füllen "dealers that fill the war chests of terrorists"

Which words are used to describe *antiquities*?

- Zeugnisse der Vergangenheit
- Weltkulturerbe - world heritage
- An so mancher Antike ungeklärter Herkunft klebt Blut! - there is blood on some unprovenanced antiquities

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- antiquities dealers, wrong conservation, the countries that did nothing to help

Which elements of moral panic are visible?

- Bewahrung des kulturellen Erbes der Menschheit vor der zerstörerischen Gier Einzelner – saving the cultural heritage of all humanity from the destructive greed of some – concern and hostility

Which orientalist tropes are used?

- Wiege der Zivilisation - cradle of civilisation
- world heritage

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Mafiöse Strukturen im deutschen Antikenhandel" (Müller-Karpe, 2016) framing the market for illicit antiquities in terms of a moral panic in 2016?

This is an interview with Michael Müller-Karpe where he talks about rebuilding and reconstruction in Syria and the general responsibility of richer countries ("we") for heritage destruction by terrorists, especially by not stopping the illicit antiquities trade. In terms of moral panic, there is a sense of concern for cultural heritage, as well as hostility towards antiquities dealers, as well as a call for stricter laws and better protection of cultural heritage by governments, including the German government.

69 Title: Museumschef Hilgert zu Kulturgutraub

Publication: Der Tagesspiegel

Date: 15. August 2016

Section: KULTUR

Author(s):

Article Genre:

Search Term Antikenschmuggel 27

Operational Research Questions:

Which words are used to describe *looting at source*?

- is a worldwide problem
- not only in war zones like Syria
- "ungehinderten Plünderungen" - unobstructed looting

Which words are used to describe *the antiquities market and market actors*?

- Antikenschmuggel
- Illegaler Handel mit Kulturgütern
- Schmuggel von Kulturgütern "smuggling cultural goods"

Which words are used to describe *antiquities*?

- "Kulturgut"
- "archäologische und kolonialzeitliche Artefakte" - archaeological and colonial artefacts

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- poverty?

Which elements of moral panic are visible?

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

- social reasons, like poverty, migration, deforestation, social instability
- even with harsh laws at source
- only to be fought by social justice

Main Research Question:

How is Museumschef Hilgert zu Kulturgutraub ('Museumschef Hilgert zu Kulturgutraub', 2016) framing the market for illicit antiquities in terms of a moral panic in 2016?

This is a short piece quoting Markus Hilgert on antiquities trafficking after the adoption of the KGSG. Hilgert is quoted saying that antiquities trafficking cannot be stopped by laws alone, be they at source or in market countries, and that the deeper reasons for looting and trafficking lie within social injustice. It is hard to discern any signs of moral panic here.

70 Title: Im Reich des Löwen;

Publication: Die Zeit

Date: 24. November 2016

Section: DOSSIER; Im Reich des Löwen

Author(s): Amrai Coen, Malte Henk

Article Genre: Feature

Search Term Raubgrabung 23

Operational Research Questions:

Which words are used to describe *looting at source*?

Which words are used to describe *the antiquities market and market actors*?

Which words are used to describe *antiquities*?

- alte Steine ("ancient Stones")
- Kulturschätze (quote Abdulkarim)
- Säulen, Skulpturen und Tempel, dieser übermenschlichen Leistungen längst verstorbener Menschen
- Kulturschätze, die er auch für seine eigenen hält - "cultural treasures, which [the West] thinks of as its own"
- Kunstwerke

Which devices are used to get/keep the reader's attention?

- very featury, lots of descriptions

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Im Reich des Löwen" (Coen & Henk, 2016) framing the market for illicit antiquities in terms of a moral panic in 2016?

This is a longread feature about the Syrian civil war, and the symbolical importance of Palmyra for Assad. Not written from a perspective of moral panic about heritage, most clearly seen in the facetious description of the ancient ruin as "a bunch of old (ancient) stones". Even the quotes of Maamoun Abdulkarim, arguably one of the protagonists of the piece, are framed somewhat ironically, as if caring for ancient heritage is laughable faced with death and the cruelties of the conflict (which, in turn, is pretty rich coming from two European journalists toward a Syrian archaeologist). The piece also deals with the murder of Khaled al-As'ad and the IS occupation of Palmyra, as well as the implication of German recruits in IS atrocities. Instead of a moral panic

about cultural heritage, there is a reaction to it if only implicit, with a slight mockery of "Western" people worrying about Syrian heritage while the dictators Assad and Putin, as well as IS are still terrorising Syrian people.

71 Title: Assurnasipals Alptraum;

Publication: Süddeutsche Zeitung

Date: 4. April 2017

Section: FEUILLETON

Author(s): Paul-Anton Krüger

Article Genre: Reportage

Search Term Raubgrabung 24

Operational Research Questions:

Which words are used to describe *looting at source*?

- gestohlen ("stolen" and similar: mainly about looting the museum)
- Raubgrabung des IS

Which words are used to describe *the antiquities market and market actors*?

- mit gestohlenen Antiken Handel trieben (IS)
- Sie sollen versucht haben, Hunderte Artefakte außer Landes zu schmuggeln. (IS)

Which words are used to describe *antiquities*?

- Artefakte
- 1700 von 2400 wertvolleren Stücke
- Kulturschätzen
- Zeugnisse der alten Hochkulturen
- Überreste zweier Lamassu-Statuen

Which devices are used to get/keep the reader's attention?

- graphic description of the Mosul Museum destruction

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- effectively, IS

Which elements of moral panic are visible?

- hostility (against IS terrorists)

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

- IS stole what they could not destroy and smuggle it out of the country. There is no mention of the buyers.

Main Research Question:

How is "Assurnasipals (sic) Alptraum" (Krüger, 2017a) framing the market for illicit antiquities in terms of a moral panic in 2017?

This is a piece about the recapturing of Mosul from IS and the destruction wrought by the terrorists on the museum and the Assyrian palaces in the city. The words used for antiquities are mostly rather specific, describing the destroyed Assyrian reliefs and lamassu figures quite competently (except for the typo in "Assurnasi(r)pal"). There is little discussion of the antiquities trafficking chain, except for the note that the terrorists "made money off what they did not destroy for propaganda", but no mention of buyers. There is no sign of a moral panic about heritage here, which has evidently died down. The last sentence is notable as it evokes "a sad irony of history" if archaeologists should make important finds in the Esarhaddon palace under the destroyed Nabi Yunus mosque (which is, incidentally, exactly what happened).

72 Title: Tausendjährige Kultur in Trümmern

Publication: Tages-Anzeiger

Date: 5. April 2017

Section: KULTUR & GESELLSCHAFT

Author(s): Paul-Anton Krüger

Article Genre:

Search Term Raubgrabung 25

Operational Research Questions:

Which words are used to describe *looting at source*?

- eifrige Tunnelgräber, um auch unter der Erde nach Verwertbarem zu suchen

Which words are used to describe *the antiquities market and market actors*?

Which words are used to describe *antiquities*?

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Tausendjährige Kultur in Trümmern" (Krüger, 2017b) framing the market for illicit antiquities in terms of a moral panic in 2017?

This piece by the same author, was published one day after the last article in the Swiss daily newspaper Tages-Anzeiger. It is often verbatim the same article (i.e., the author sold his text to several buyers, which is not uncommon for freelance journalists). This one has one more sentence on the tunnels of Nabi Yunus. There is a sense of sadness about the destroyed culture, but no heightened sense of alarm, which points toward a moral panic that has died down.

After 2017

73 Title: Kriminalisierung des Handels

Publication: Der Standard

Date: 6. April 2019

Section: ALBUM

Author(s): Olga Kronsteiner

Article Genre:

Search Term Raubgrabung 26

Operational Research Questions:

Which words are used to describe *looting at source*?

Which words are used to describe *the antiquities market and market actors*?

- illegalen Handel mit Kulturgütern – "the illegal trade with cultural goods"
- der seriöse Kunsthandel – "the respectable art trade"
- Kulturgutschmuggel – "smuggling cultural goods"
- Kunsthandel – "art trade"
- illegalen Kulturguthandel – "illegal art trade"
- seriösen Handels – "respectable trade" again
- namhaften Auktionshäusern – "reputable auction houses"

Which words are used to describe *antiquities*?

- Kulturgut(schützer)
- Antike Originale – "ancient originals"
- internationalen Kulturguthandel – "international trade in cultural goods"
- außereuropäischer Kulturgüter
- geraubte Güter

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- some criminals?

Which elements of moral panic are visible?

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "Kriminalisierung des Handels" (Kronsteiner, 2019) framing the market for illicit antiquities in terms of a moral panic in 2019?

This piece from the Austrian daily DER STANDARD deplores a perceived "criminalisation" of the art market in the discourse of antiquities trafficking. Terror financing is mentioned, but under the heading "Gespenst Terrorfinanzierung", i.e., "the spectre of terror financing" and it is noted that the claims of antiquities trafficking being a major income source for IS could never be substantiated.

The author, knowingly or inadvertently, conflates the trade of fine art ("the current Rothko-retrospective") with the trade in antiquities. She quotes Christoph Bacher, a Vienna antiquities dealer, and calls antiquities crime researchers "hardliners" instead of calling in a second opinion.

She does lament, though, that in a planned panel on antiquities trafficking in Vienna's Kunsthistorisches Museum, no market representative was invited.

She ends with a shot towards Michael Müller-Karpe (who was invited), reminding the reader of a then nearly ten years old case (the libel suit also noted in this study: 'Teilerfolg Für Antikenhändler', 2011), in which a judge had called Müller-Karpe's mental health into question. In short, the article reads quite biased towards the side of the antiquities market and might therefore be a sign of the backlash against the preceding moral panic.

74 Title: Kriminal-archäologe Michael Müller-Karpe ermittelt die wahre Herkunft antiker Stücke; DER SCHRECKEN DER SCHATZRAUBER

Publication: BILD Frankfurt

Date: 19. November 2019

Section: Frankfurt Rhein-Main

Author(s): Marco Schwarz

Article Genre:

Search Term Raubgrabung 27

Operational Research Questions:

Which words are used to describe *looting at source*?

- Raubgrabungen
- Objekt undokumentiert der Fundstelle entnommen
- Vermutlich in den Wirren nach dem Irak-Krieg aus einer Ausgrabung oder einem Museum gestohlen und auf den Schwarzmarkt gelangt
- Laut RGZM sicher eine Raubgrabung

Which words are used to describe *the antiquities market and market actors*?

- mutmaßlichen Hehler
- Antiken-Händler

Which words are used to describe *antiquities*?

- Beweisstücke seiner Fälle
- Kulturschätze
- Fundstücke zweifelhafter Herkunft
- Kulturgüter

Which devices are used to get/keep the reader's attention?

- "true crime" style

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

Which elements of moral panic are visible?

Which orientalist tropes are used?

- Eigentum der gesamten Menschheit - property of all humanity

How is the *antiquities trafficking chain* constructed in this article?

Main Research Question:

How is "DER SCHRECKEN DER SCHATZRÄUBER" (Schwarz, 2019) framing the market for illicit antiquities in terms of a moral panic in 2019?

This is a short piece in the Frankfurt region local part of the tabloid BILD, about some antiquities trafficking cases worked by Michael Müller-Karpe who is introduced as "the terror of the treasure hunters/looters". It is framed in the style of criminal cases, introducing each case with a short "fact sheet": The Shulgi axe head, another Iraqi bronze axe head, the Iranian silver goblet from Anshan (which was given back to the dealer and sold at auction for almost double the original asking price), and an iron-age (Celtic) bronze vessel offered at auction in London, but probably from South-Western Germany. While there are nods toward the destructive effects of looting and antiquities trafficking, the tone is not indicative of a moral panic.

75 Title: Krimi um König Shapur

Publication: Der Tagesspiegel

Date: 24. June 2020

Section: Kultur (Keywords: Antikenhandel und Raubkunst)

Author(s): Stefan Koldehoff

Article Genre:

Search Term Raubgrabung 28

Operational Research Questions:

Which words are used to describe *looting at source*?

- der Teller stamme aus einer Raubgrabung
- dubiose Herkunft des Objektes

Which words are used to describe *the antiquities market and market actors*?

- Antikenhändler
- Inverkehrbringen von Kulturgut
- eines von vielen Zugeständnissen im Gesetz an den Kunsthandel
- illegalen Handel mit Antiken

Which words are used to describe *antiquities*?

- ein wertvoller sassanidischer Silberteller aus dem 4. Jahrhundert
- antiken Objektes
- rund 3000 Objekte
- die beschlagnahmten Dinge
- mutmaßliche Hehlergut
- Beute aus Raubgrabungen
- Kulturgüter
- Archäologische Funde
- veräußerte Antike

Which devices are used to get/keep the reader's attention?

Contributory Research Questions:

Who is held responsible for the loss of cultural heritage?

- the antiquities market, aided and abetted by the shortcomings of the KGSG

Which elements of moral panic are visible?

- the law is still bad

Which orientalist tropes are used?

How is the *antiquities trafficking chain* constructed in this article?

- Antiquities prices/demand provide financial incentive to loot
- fewer restitution cases because the market is flooded by fakes and lawyer costs are too high

Main Research Question:

How is "Krimi um König Shapur" (Koldehoff, 2020) framing the market for illicit antiquities in terms of a moral panic in 2020?

This article follows the case of a Sassanian silver plate from Iraq or Iran that had been seized by Bavarian police already in 1998 and later (in 2018) sold at an auction of the Bavarian finance ministry in Munich despite a claim of the Iraqi government. The author accuses the Bavarian authorities of "laundering" the antiquity through the sale, which is not inaccurate. The article notes a few problems with the KGSG from 2016, which include the cutoff date of 2016 or 2007. It is also noted that there are fewer restitution claims these days because for one, the market is flooded with forgeries, and secondly, the legal situation makes them generally unpromising,

In terms of moral panic, there is little evidence of the classic signs, despite the criticism of the KGSG, but rather, there is a sense of resignation, or more level-headed reporting.

BIBLIOGRAPHY

- AFP. (2002, November 5). Afghanische Behoerden vereiteln Kunstschnuggel in grossem Stil—Kulturgegenstaende sichergestellt. *AFP German*.
- Ait Said-Ghanem, N. (2022). Smuggling Cuneiform Tablets in Aniseed Bags: Profile of a Sale Made by Elias Gejou to the British Museum in 1896. *Bulletin of the History of Archaeology*, 32(2), 1–12. <https://doi.org/10.5334/bha-667>
- Alder, C., & Polk, K. (2002). Stopping This Awful Business: The Illicit Traffic in Antiquities Examined as a Criminal Market. *Art Antiquity and Law*, 7, 35.
- Almohamad, A. (2021). The destruction and looting of cultural heritage sites by ISIS in Syria: The case of Manbij and its countryside. *International Journal of Cultural Property*, 28, 221–260. <https://doi.org/doi:10.1017/S0940739121000114>
- Altaweel, M. (2019). The Market for Heritage: Evidence From eBay Using Natural Language Processing. *Social Science Computer Review*, 1–25. <https://doi.org/10.1177/0894439319871015>
- Altheide, D. L. (2009). Moral panic: From sociological concept to public discourse. *CRIME MEDIA CULTURE*, 5(1), Article 1. <https://doi.org/10.1177/1741659008102063>
- Amineddoleh, L. (2016). How western art collectors are helping to fund Isis. *The Guardian*. <https://www.theguardian.com/artanddesign/2016/feb/26/western-art-funding-terrorism-isis-middle-east>
- Arnold, B. T., & Weisberg, D. B. (2002). A Centennial Review of Friedrich Delitzsch's 'Babel und Bibel' Lectures. *Journal of Biblical Literature*, 121(3), 441–457.
- Ausschuss für Kultur und Medien. (2016, April 16). *Wortprotokoll der 55. Sitzung*. Deutscher Bundestag. <https://www.bundestag.de/resource/blob/422872/292af30116aace4fdc352ecf2cabb079/Protokoll.pdf>
- Bahrani, Z. (2011). Untold Tales of Mesopotamian Discovery. In *Scramble for the Past—A story of archaeology in the Ottoman Empire* (pp. 125–155).
- Bahrani, Z. (2018). Conjuring Mesopotamia—Imaginative geography and a world past. In *Archaeology under Fire—Nationalism, politics and heritage in the Eastern Mediterranean and Middle East* (2nd ed., pp. 159–174). Routledge.
- Barker, A. W. (2018). Looting, the Antiquities Trade, and Competing Valuations of the Past. *Annual Review of Anthropology*, 47(Volume 47, 2018), 455–474. <https://doi.org/10.1146/annurev-anthro-102116-041320>

- Bauer, W. (2007, November 25). Gold im Staub; Der Helm eines Kriegers, eine Gürtelschnalle mit Edelsteinen—Auf der Suche nach solchen Schätzen plündern Raubgräber in Afghanistan hunderte antiker Stätten. Und die Welt verliert ein Kapitel ihrer Geschichte. *Tagesspiegel*.
- Baykal, H. (2012, October 18). Die Weltkultur brennt; In Aleppo, Palmyra und an anderen Stätten wird das historische Erbe Syriens zwischen den Fronten des Bürgerkriegs aufgerieben. *Tagesspiegel*.
- Black's Law Dictionary. (2011, November 4). *INDIVIDUAL Definition & Meaning*. The Law Dictionary. <https://thelawdictionary.org/individual/>
- Brodie, N. (2006). The Plunder of Iraq's Archaeological Heritage, 1991- 2005, and the London Antiquities Trade. In *Archaeology, Cultural Heritage and..... the Antiquities Trade* (pp. 206–226). University Press, Florida.
- Brodie, N. (2010). Archaeological Looting and Economic Justice. In P. M. Messenger & G. S. Smith (Eds.), *Cultural Heritage Management: A Global Perspective* (p. 0). University Press of Florida. <https://doi.org/10.5744/florida/9780813034607.003.0021>
- Brodie, N. (2011a). The Market in Iraqi Antiquities 1980–2009 and Academic Involvement in the Marketing Process. In *Crime in the Art and Antiquities World: Illegal Trafficking in Cultural Property*. Springer Science+Business Media,.
- Brodie, N. (2011b, August 4). *Scholarship and insurgency? The study and trade of Iraqi antiquities*. Illicit Traffic of Cultural Objects: Law, Ethics and Realities, University of Western Australia.
- Brodie, N. (2014a). Provenance and Price: Autoregulation of the Antiquities Market? *Eur J Crim Policy Res*, 20, 427–444. <https://doi.org/10.1007/s10610-014-9235-9>
- Brodie, N. (2014b). The Antiquities Market: It's All in a Price. *Heritage & Society*, 7(1), Article 1. <https://doi.org/10.1179/2159032X14Z.00000000017>
- Brodie, N. (2015a). Syria and its Regional Neighbors: A Case of Cultural Property Protection Policy Failure? *International Journal of Cultural Property*, 317–335. <https://doi.org/10.1017/S0940739115000144>
- Brodie, N. (2015b). The Internet Market in Antiquities. *Countering Illicit Traffic in Cultural Goods: The Global Challenge of Protecting the World's Heritage*, 11–20.
- Brodie, N. (2015c). Why Is No One Talking about Libya's Cultural Destruction? *Near Eastern Archaeology*, 78(3), 212–217.
- Brodie, N. (2017). Virtually gone! The internet market in antiquities. In *Proceedings of the 6th International Conference of Experts on the Return of Cultural Property* (pp. 190–204).
- Brodie, N. (2019a). The Criminal Organization of the Transnational Trade in Cultural Objects: Two Case Studies. In *The Palgrave Handbook on Art Crime* (pp. 439–461).

- Brodie, N. (2019b). Through a Glass, Darkly: Long-Term Antiquities Auction Data in Context. *International Journal of Cultural Property*, 26, 265–283.
<https://doi.org/doi:10.1017/S094073911900016X>
- Brodie, N. (2020). Restorative justice? Questions arising out of the Hobby Lobby return of cuneiform tablets to Iraq. *Revista Memória Em Rede*, 12(23), 87–109.
- Brodie, N. (2021). Cuneiform Exceptionalism? Justifying the Study and Publication of Unprovenanced Cuneiform Tablets from Iraq. In *Crime and Art* (pp. 103–117). Springer.
- Brodie, N. (2022). The Looting and Trafficking of Syrian Antiquities Since 2011 1.
 In *Antiquities Smuggling in the Real and Virtual World*. Routledge.
- Brodie, N. (2023). Noxious scholarship? The study and publication of First Sealand Dynasty cuneiform tablets. In *Variant Scholarship: Ancient Texts in Modern Contexts* (pp. 95–112). Sidestone Press.
- Brodie, N., & Kersel, M. M. (2012). The social and political consequences of devotion to Biblical artifacts. In *All The Kings Horses: Essays on the Impact of Looting and the Illicit Antiquities Trade on our Knowledge of the Past* (pp. 109–125). Society for American Archaeology.
- Brodie, N., & Kersel, M. M. (2014). WikiLeaks, Text, and Archaeology: The Case of the Schøyen Incantation Bowls. In *Archaeologies of Text*. Oxbow Books.
- Brodie, N., Kersel, M. M., Mackenzie, S., Sabrine, I., Smith, E., & Yates, D. (2021). Why There is Still an Illicit Trade in Cultural Objects and What We Can Do About It. *JOURNAL OF FIELD ARCHAEOLOGY*.
- Brodie, N., & Manivet, P. (2017). Cylinder Seal Sales at Sotheby's and Christie's (1985–2013). *Journal of Art Crime*, 17(3), Article 3.
- Brodie, N., & Renfrew, C. (2005). LOOTING AND THE WORLD'S ARCHAEOLOGICAL HERITAGE: The Inadequate Response. *Annual Review of Anthropology*, 34(Volume 34, 2005), 343–361. <https://doi.org/10.1146/annurev.anthro.34.081804.120551>
- Brodie, N., & Sabrine, I. (2018). The Illegal Excavation and Trade of Syrian Cultural Objects: A View from the Ground. *JOURNAL OF FIELD ARCHAEOLOGY*, 43(1), Article 1.
<https://doi.org/10.1080/00934690.2017.1410919>
- Brodie, N., & Yates, D. (2022). Money Laundering and Antiquities. *Transfer – Zeitschrift Für Provenienzforschung Und Sammlungsgeschichte | Journal for Provenance Research and the History of Collection*, 1, 97–109. <https://doi.org/10.48640/tf.2022.1.91516>
- Brown, M. F. (2004). Heritage as Property. In *Property in Question*. Routledge.
- Casana, J. (2015). Satellite Imagery-Based Analysis of Archaeological Looting in Syria. *Near Eastern Archaeology*, 78(3), Article 3.

Casana, J., & Laugier, E. J. (2017). Satellite imagery-based monitoring of archaeological site damage in the Syrian civil war. *PloS ONE*, 12(11), Article 11. <https://doi.org/10.1371/journal.pone.0188589>

Casana, J., & Panahipour, M. (2014). Satellite-Based Monitoring of Looting and Damage to Archaeological Sites in Syria. *Journal of Eastern Mediterranean Archaeology & Heritage Studies*, 2(2), Article 2.

Coen, A., & Henk, M. (2016, November 24). Im Reich des Löwen. *Die Zeit*.

Coggins, C. C. (1995). A Licit International Traffic in Ancient Art: Let There Be Light! *International Journal of Cultural Property*, 4(1), 61–80. <https://doi.org/10.1017/S0940739195000051>

Cohen, S. (2002). *Folk Devils and Moral Panics: The creation of the Mods and Rockers* (3rd ed.). Routledge.

Coins Weekly. (2019, July 4). *Der ILLICID-Schlussreport ist publiziert*. <https://muenzenwoche.de/der-illucid-schlussreport-ist-publiziert/>

Commission presents Action Plan to strengthen the fight against terrorist financing. (2017). [Text]. European Commission - European Commission. https://ec.europa.eu/commission/presscorner/detail/en/IP_16_202

Creamer, Z. (2024). Decommodifying Cultural Heritage: A Linguistic Unpacking of. *William & Mary Law Review*, 65(5), 1204–1230.

Critcher, C. (2008). Moral Panic Analysis: Past, Present and Future. *Sociology Compass*, 2(4), Article 4. <https://doi.org/10.1111/j.1751-9020.2008.00122.x>

Critcher, C. (2017). Moral Panics. In *Oxford Research Encyclopedia of Criminology and Criminal Justice*. <https://doi.org/10.1093/acrefore/9780190264079.013.155>

Cunliffe, E. (2012). *DAMAGE TO THE SOUL: SYRIA'S CULTURAL HERITAGE IN CONFLICT*.

D'Angelo, P. (2009). Conclusion: Arriving At the Horizons of News Framing Analysis. In *Doing News Framing Analysis*. Routledge.

D'Angelo, P. (2017). Framing: Media Frames. In *The International Encyclopedia of Media Effects* (pp. 1–10). John Wiley & Sons, Ltd. <https://doi.org/10.1002/9781118783764.wbieme0048>

D'Angelo, P., & Kuypers, J. A. (Eds.). (2009). *Doing News Framing Analysis: Empirical and Theoretical Perspectives*. Routledge. <https://doi.org/10.4324/9780203864463>

Davis, T., & Mackenzie, S. (2014). 15 Crime and Conflict: Temple Looting in Cambodia. In *Cultural Property Crime* (pp. 292–306). Brill. https://doi.org/10.1163/9789004280540_016

Die eigentlichen Täter sind die Käufer. (2015, February 24). *Südwest Presse*.

Die Neuregelung des Kulturgutschutzrechts. (2016). Bundesregierung.

- Dietzler, J. (2013). On ‘Organized Crime’ in the illicit antiquities trade: Moving beyond the definitional debate. *Trends in Organized Crime*, 16(3), 329–342. <https://doi.org/10.1007/s12117-012-9182-0>
- Dittmar, P. (2003, Mai). Hölle im Paradies. *Die Welt*.
- Doering, M. (2005, Oktober). ARCHÄOLOGE ‘Kein Handel mit Bodenfunden!’ *Berliner Zeitung*, 298 words.
- Doering, M. (2007, February 1). Der Ton der Händler-Lobby; Das Gesetz zum Kulturgüterschutz fördert Raubgrabungen, sagt der Archäologe Michael Müller-Karpe. *Berliner Zeitung*.
- Doering, M. (2009, Oktober). Ein Verbrechen gegen die Menschheit Der irakische Botschafter Alaa Al-Hashimy über Raubgrabungen, mesopotamische Kunstschatze und Deutschland als Drehscheibe der Hehlerei. *Berliner Zeitung*.
- Doering, M. (2014a, Oktober). Allahs gierige Räuber; IS-Dschihadisten finanzieren sich aus Plünderungen und illegalem Antiken-Handel—Was durch deutsche Gesetzeslücken befördert wird. *Berliner Zeitung*.
- Doering, M. (2014b, July 5). Machtloser Westen. *Berliner Zeitung*.
- Doering, M. (2014c, November 21). ‘Raubgrabungsfunde können auf keiner Liste stehen’; Der Archäologe Müller-Karpe zur geplanten Novellierung des Kulturgüterschutzgesetzes und zum Einfluss der Kunsthändlerlobby. *Berliner Zeitung*.
- Elkins, N. T. (2022). Working a Case on Looted and Smuggled Ancient Coins as an Expert Witness. In *Antiquities Smuggling in the Real and Virtual World*. Routledge.
- Entman, R. M. (1993). Framing: Toward Clarification of a Fractured Paradigm. *Journal of Communication*, 43(4), 51–58.
- Entman, R. M. (2004). *Projections of power: Framing news, public opinion, and US foreign policy*. University of Chicago Press.
- Entman, R. M., Matthes, J., & Pellicano, L. (2009). Nature, Sources, and Effects of News Framing. In *Handbook of Journalism Studies*.
- Erfolg im Kampf gegen Grabräuber. (2011, July 6). *Idsteiner Zeitung*.
- European Commission. (2021). *COMMISSION IMPLEMENTING REGULATION (EU) .../... Of 24.6.2021*.
- European Commission, Brodie, N., Yates, D., Slot, B., Batura, O., & van Wanrooj, N. (2019). *Illicit trade in cultural goods in Europe—Characteristics, criminal justice responses and an analysis of the applicability of technologies in the combat against the trade*. Directorate-General for Education, Youth, Sport and Culture.

European Commission—Have your say. (2021, April 21). [Text]. European Commission - Have Your Say. https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/11562-Imports-of-cultural-goods-into-the-EU-rules/feedback_en?p_id=22635125

European Commission—Have your say. (2022, June 3). [Text]. European Commission - Have Your Say. https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13352-Trafficking-in-cultural-goods-EU-action-plan/feedback_en?p_id=30764173

Europol. (2016). *European Union Terrorism Situation and Trend Report (TE-SAT) 2016*. Europol. <https://www.europol.europa.eu/publications-events/main-reports/european-union-terrorism-situation-and-trend-report-te-sat-2016>

Finanzgericht: Goldgefäß aus dem Irak. (2009, September 29). *Idsteiner Zeitung*.

Fincham, D. (2010). The Distinctiveness of Property and Heritage. *Penn State Law Review*, 115, 641.

Fitz Gibbon, K. (2019, July 14). Was ILLICID Report ‘Buried’ For Failing to Show Illegal Trade? *Cultural Property News*. <https://culturalpropertynews.org/was-illicid-report-buried-for-failing-to-show-illegal-trade/>

Földi, Z. (2017). Cuneiform Tablets and the Antiquities Market The Archives from Dūr-Abī-ešuh*. *Distant Worlds Journal*, 2, 7–27.

Frahm, E. (2017). Images of Assyria in Nineteenth- and Twentieth-Century Western Scholarship. In *Orientalism, Assyriology and the Bible* (pp. 82–85). Sheffield Phoenix Press.

Frey, C. (2014, November 18). Raubkunst; Westliche Antiken-Käufer finanzieren Messer des IS. *Welt Online*.

Fuchs, F. (2012, July 13). Geraubte Geschichte; Die Ausstellung „Kriminalarchäologie“ informiert über Hehlerei mit antiken Kunstschatzen. *Süddeutsche Zeitung (Inkl. Regionalausgaben)*.

Funke, B. (2015, January 23). Ein Zeichen gegen Grabräuber; KULTURGUT Römisch-Germanisches Zentralmuseum in Mainz gibt sieben 6000 Jahre alte Objekte an den italienischen Staat zurück. *Wormser Zeitung*.

Garland, D. (2008). On the concept of moral panic. *Crime, Media, Culture*, 4(1), 9–30. <https://doi.org/10.1177/1741659007087270>

Gartmann, F. (2012, September 20). Hehlerei von Amts wegen. *Handelsblatt*.

Gaul, S. (2009, July 6). Deutsch-irakischer Tanz ums goldene Gefäß. *Stuttgarter Zeitung*.

Geerling, V. (2023, April 17). *International Association of Dealers in Ancient Art*. <https://iadaa.org/?lang=de>

Gehlen, M. (2014, Dezember). DIE BEDROHTE VIELFALT DES ORIENTS; *Tagesspiegel*.

- Gehlen, M. (2015a, February 27). Zerstörung für die Propaganda, Schmuggel für die Kriegskasse. *Die Zeit*.
- Gehlen, M. (2015b, February 28). Geraubte Kunst füllt die Kriegskasse. *Stuttgarter Zeitung*.
- Gehlen, M. (2015c, February 28). Kunstraub finanziert Terror. *Die Presse*.
- Geisen, T. (2015, December 30). ‘Empörung ist unglaublich’; Der IS finanziert sich auch über den Verkauf von Raubkunst—Der Kriminalarchäologe Michael Müller-Karpe wirft Politik und Justiz in Deutschland mangelnde Sensibilität vor. *Kölner Stadt-Anzeiger*.
- Geraubtes Erbe; Zur Kulturgutschutz-Debatte: Günther Wessel über illegalen Antikenhandel. (2015, Dezember). *Südwest Presse*.
- Gerstenblith, P. (2013). The meaning of 1970 for the acquisition of archaeological objects. *JOURNAL OF FIELD ARCHAEOLOGY*, 38(4), 364–373.
<https://doi.org/10.1179/0093469013Z.000000000062>
- Gerstenblith, P. (2014). Do Restrictions on Publication of Undocumented Texts Promote Legitimacy? In *Archaeologies of Text* (pp. 214–226). Oxbow Books.
- Gerstenblith, P. (2019). Provenances: Real, Fake, and Questionable. *International Journal of Cultural Property*, 26, 285–304. <https://doi.org/doi:10.1017/S0940739119000171>
- Gerstenblith, P. (2020). Provenience and Provenance Intersecting with International Law in the Market for Antiquities. *North Carolina Journal of International Law*, 45, 457.
- Gerstenblith, P. (2022). Hobby Lobby, the Museum of the Bible and the Law: A Case Study of the Looting of Archaeological Artifacts from Iraq. In *Antiquities Smuggling in the Real and Virtual World* (pp. 59–95). Routledge.
- Gerstenblith, P. (2023). Ethical guidelines for publishing ancient texts. In *Variant Scholarship: Ancient Texts in Modern Contexts* (pp. 137–154). Sidestone Press.
- Gerstenblith, P., & Kersel, M. M. (2023). Disrupting the Trade: A Legal Approach to Countering Trafficking in Archaeological Artifacts in the MENA Region. *Journal of Art Crime*, 29, 3–13.
- Gill, D. W. J. (2016). Thinking About Collecting Histories: A Response to Marlowe. *International Journal of Cultural Property*, 23(3), 237–244. <https://doi.org/10.1017/S0940739116000187>
- Gill, D. W. J., & Chippindale, C. (1993). Material and Intellectual Consequences of Esteem for Cycladic Figures. *American Journal of Archaeology*, 97(4), Article 4.
- Goldgefäß—Museumsbrief an Steinmeier. (2009, July 7). *Idsteiner Zeitung*.
- Goldgefäß—Zoll hofft auf ‘Konsens’. (2009, July 1). *Idsteiner Zeitung*.
- Goode, E., & Ben-Yehuda, N. (1994). Moral Panics: Culture, Politics, and Social Construction. *Annual Review of Sociology*, 20, 149–171.
- Goode, E., & Ben-Yehuda, N. (2010). *Moral panics: The social construction of deviance* (2nd ed.).

- Goode, E., & Ben-Yehuda, N. (2011). Moral Panic. In *The Routledge Handbook of Deviant Behaviour* (pp. 46–52).
- Greenland, F., Marrone, J. M., Topçuoğlu, O., & Vorderstrasse, T. (2019). A Site-Level Market Model of the Antiquities Trade. *International Journal of Cultural Property*, 26, 21–47.
- Hall, S. (1997). The Work of Representation. In *Representation: Cultural Representations and Signifying Practices* (Vol. 2).
- Hanimann, J. (2013, August 30). Zerstörung von Kulturschätzen in Syrien; Das Schlimmste sind die Raubgräber. *Süddeutsche Zeitung*.
- Häntzschel, J. (2016, February 18). Alles in Scherben; Der Bundestag berät über die Neufassung eines Gesetzes, das Kulturgut schützen soll. Doch gegen den Handel mit illegal ausgegrabener antiker Kunst nützt es nichts, kritisiert der Archäologe Michael Müller-Karpe. *Süddeutsche Zeitung*, 1436 words.
- Hardy, S. A. (2015a). The conflict antiquities trade: A historical overview. In *Countering the illicit traffic in cultural goods: The global challenge of protecting the world's heritage* (pp. 21–31).
- Hardy, S. A. (2015b). Virtues Impracticable and Extremely Difficult: The Human Rights of Subsistence Diggers. In *Ethics and the Archaeology of Violence* (pp. 229–239).
- Harmanşah, Ö. (2015). ISIS, Heritage, and the Spectacles of Destruction in the Global Media. *Near Eastern Archaeology*, 78(3), 170–177. <https://doi.org/10.5615/neareastarch.78.3.0170>
- Hashemi, L., & Waddell, A. (2022). Investigating the Online Trade of Illicit Antiquities. In *Antiquities Smuggling in the Real and Virtual World*. Routledge.
- Hein, F., & Müller, B. (2015, June 30). Kandidaten für das Weltkulturerbe. *Rheinische Post*.
- Helle, S. (2016). The Return of Mess O'Potamia: Time, Space, and Politics in Modern Uses of Ancient Mesopotamia. *Postcolonial Studies*, 19(3), Article 3.
- Herman, A. (2018). Timbuktu, International Criminal Law and Cultural Heritage Protection. *Art Antiquity and Law*, 23, 61.
- Hilgert, M. (2015). *Verfahren zur Erhellung des Dunkelfeldes als Grundlage für Kriminalitätsbekämpfung und -prävention am Beispiel antiker Kulturgüter (ILLICID)*.
- Hilgert, M. (2019). *Illegaler Handel mit Kulturgut in Deutschland. Verfahren zur Erhellung des Dunkelfeldes als Grundlage für Kriminalitätsbekämpfung und -prävention am Beispiel antiker Kulturgüter*. Kulturstiftung der Länder, Stiftung bürgerlichen Rechts.
<https://doi.org/10.2314/KXP:1664575944>
- Hilgert, M., & Hemeier, B. (2020). *Transparency, Provenance and Consumer Protection Facts and Policy Recommendations Concerning the Trade in Ancient Cultural Property in Germany*. ILLICID.

- Hollowell, J. (2006). Moral arguments on subsistence digging. In *The ethics of archaeology: Philosophical perspectives on archaeological practice* (pp. 69–93).
- Homeland Security Committee. (2016). *CASH TO CHAOS: DISMANTLING ISIS' FINANCIAL INFRASTRUCTURE - HOUSE HOMELAND SECURITY COMMITTEE MAJORITY STAFF REPORT*.
- Hunt, A. (1997). 'Moral Panic' and Moral Language in the Media. *The British Journal of Sociology*, 48(4), Article 4.
- IAA. (2018). *For an ethical practice in our disciplines – The International Association for Assyriology*. <https://iaassyriology.com/iaa-ethics/>
- IADAA. (2019, July 1). *Publication of the ILLICID report into the illegal trade in cultural property in Germany*.
- IADAA. (2023). *FIGHTING BOGUS INFORMATION ABOUT THE ART MARKET*. <https://iadaa.org/fakten-und-zahlen/?lang=de>
- Kapff, D. (2005, Mai). Wenn von der nackten Maja nur der Kopf bleibt; Archäologen beklagen Millionenverluste: Raubgräber vergreifen sich an fremden Schätzen, auch in Deutschland. *Stuttgarter Zeitung*.
- Kersel, M. M. (2006). From the Ground to the Buyer A Market Analysis of the Trade in Illegal Antiquities. In Brodie, Neil; Kersel, Morag M.; Tubb Kathryn Walker (Ed.), *Archaeology, Cultural Heritage, and the Antiquities Trade* (p. 0). University Press of Florida. <https://doi.org/10.5744/florida/9780813029726.003.0010>
- Kersel, M. M. (2007). Transcending Borders: Objects on the Move. *Archaeologies: Journal of the World Archaeological Congress*. [https://doi.org/DOI 10.1007/s11759-007-9013-0](https://doi.org/DOI%2010.1007/s11759-007-9013-0)
- Kersel, M. M. (2012). The Power of the Press The Effects of Press Releases and Popular Magazines on the Antiquities Trade. In *Archaeology, Bible, Politics, and the Media: Proceedings of the Duke University Conference, April 23–24, 2009*. Eisenbrauns.
- Kersel, M. M. (2017). Object movement: UNESCO, language, and the exchange of Middle Eastern artifacts. In *The Routledge Companion to Cultural Property*. Routledge.
- Kersel, M. M. (2020). Engaging with demand and destruction. *Antiquity*, 94(376), Article 376. <https://doi.org/10.15184/aqy.2020.62>
- Kersel, M. M. (2023a). Innocents Abroad? The Consumption of Antiquities from the Holy Land. *Journal of Ancient Judaism*, 14, 263–290.
- Kersel, M. M. (2023b). The trouble with texts. In *Variant Scholarship: Ancient Texts in Modern Contexts* (pp. 155–165). Sidestone Press.

Kersel, M. M., & Gerstenblith, P. (2025). Cultural Heritage and Security Policy. *University of Chicago Legal Forum*, 2024.

KGSG. (2016). <https://www.gesetze-im-internet.de/kgsg/>

Koldehoff, S. (2006, January 29). Museen vernichten die Geschichte unserer Erde. *Welt Am Sonntag*.

Koldehoff, S. (2020, Mai). Krimi um König Shapur. *Tagesspiegel*.
<https://www.tagesspiegel.de/kultur/antikenhandel-und-raubkunst-krimi-um-koenig-shapur/25855894.html>

Kronsteiner, O. (2019, April 6). Kriminalisierung des Handels. *Der Standard*.

Krüger, P.-A. (2017a, April 4). Assurnasipals Alptraum; Der IS verwüstete das Museum im irakischen Mossul und die Ruinen von Nimrud. Nun wird die Stadt befreit. Der erste Besuch zeigt die zertrümmerten Zeugnisse der Antike. *Süddeutsche Zeitung*.

Krüger, P.-A. (2017b, April 5). Tausendjährige Kultur in Trümmern. *Tages-Anzeiger*.

Kuhn, N. (2016a, February 22). Auch Kunst braucht einen Pass; Eckart Köhne, Präsident des Deutschen Museumsbundes, über Raubgrabungen und Kulturgutschutz. *Tagesspiegel*, 1407 words.

Kuhn, N. (2016b, April 11). Koalition der Gleichgültigen. *Tagesspiegel*.

Kultur kompakt. (2011, February 10). *Welt*.

Kulturerbe füllt Kriegskasse. (2015, February 24). *Südwest Presse*.

Kulturgüterschutz – International Association of Dealers in Ancient Art. (2023, April 17).
<https://iadaa.org/kulturgueterschutz/?lang=de>

Kunst als Terrorfinanzierung? (2005, July 17). *Der Spiegel*. <https://www.spiegel.de/politik/kunst-als-terrorfinanzierung-a-4c409306-0002-0001-0000-000041106138>

Kunsthandel, I. D. (2019a, January 22). *Pressemitteilung zur Evaluierung des Kulturgutschutzgesetzes – Interessengemeinschaft Deutscher Kunsthandel*.
<http://interessengemeinschaftdeutscherkunsthandel.de/2019/01/22/pressemitteilung-zur-evaluierung-des-kulturgutschutzgesetzes/>

Kunsthandel, I. D. (2019b, January 22). *Pressemitteilung zur Gründung der Interessengemeinschaft Deutscher Kunsthandel – Interessengemeinschaft Deutscher Kunsthandel*.
<http://interessengemeinschaftdeutscherkunsthandel.de/2019/01/22/pressemitteilung-zur-gruendung-der-interessengemeinschaft-deutscher-kunsthandel/>

Kunsthandel, I. D. (2019c, March 19). *Pressemitteilung / Kampf gegen illegalen Kulturguthandel ohne Grundlage – Politischer Wille statt Fakten – Interessengemeinschaft Deutscher Kunsthandel*.
<http://interessengemeinschaftdeutscherkunsthandel.de/2019/03/19/pressemitteilung-kampf-gegen-illegalen-kulturguthandel-ohne-grundlage-politischer-wille-statt-fakten/>

- Kunsthandel, I. D. (2019d, July 3). *Pressemitteilung / Freispruch für den Kunsthandel – Interessengemeinschaft Deutscher Kunsthandel*.
<http://interessengemeinschaftdeutscherkunsthandel.de/2019/07/03/pressemitteilung-freispruch-fuer-den-kunsthandel/>
- Lehmann, R. G. (1994). *Friedrich Delitzsch und der Babel-Bibel-Streit* (Vol. 133). Vandenhoeck & Ruprecht.
- Leitbild der IADAA – International Association of Dealers in Ancient Art*. (2023, April 17).
<https://iadaa.org/kulturgueterschutz/leitbild-der-iadaa/?lang=de>
- Lenzerini, F. (2023). Heritage Destruction and Human Rights. In *The Routledge Handbook of Heritage Destruction* (pp. 89–99).
- Lewis, S. C., & Reese, S. D. (2009). What is the War on Terror? Framing through the Eyes of Journalists. *Journalism & Mass Communication Quarterly*, 86(1), 85–102.
<https://doi.org/10.1177/107769900908600106>
- Lindner, E. (2015, February 26). ‘Wetlauf mit der Zeit’; *Die Zeit*.
- Loges, L. (2022). “Do you expect us to throw it all away?” Thirty years of looted Iraqi cuneiform archives. In *Global Perspectives on Cultural Property Crime* (1st ed., pp. 147–159). Routledge.
- Loges, L. (2024). Heritage, Journalism, and Moral Panic: Media Framing of the Looting of Iraqi and Syrian Antiquities. In *The Routledge Handbook of Archaeology and the Media in the 21st Century*. Routledge.
- Losson, P. (2017). Does the International Trafficking of Cultural Heritage Really Fuel Military Conflicts? *STUDIES IN CONFLICT & TERRORISM*, 40(6), Article 6.
<http://dx.doi.org/10.1080/1057610X.2016.1221255>
- Lüscher, G. (2002, Oktober). Stein aus biblischer Zeit. *Neue Zürcher Zeitung*.
- Lüscher, G. (2014, September 2). Die Kunstmafia und die Kriegsmillionen; Zwei Filme über illegalen Kunsthandel. *Neue Zürcher Zeitung*. <https://advance.lexis.com/document/?pdmfid=1519360&crd=5710b72a-6e44-4a42-97c1-eefa0ab7c782&pdocfullpath=%2Fshared%2Fdocument%2Fnews%2Furn%3AcontentItem%3A5D22-5HN1-F047-J30J-00000-00&pdoccontentcomponentid=12122&pdtype=sr166&pdtab=allpods&ecomp=kzJ3k&earg=sr166&prid=585e7a1a-57ec-4405-bd78-61e9a7ea33b8>
- Mackenzie, S. (2005). *Going, going, gone: Regulating the market in illicit antiquities*. Institute of Art and Law.
- Mackenzie, S. (2011a). Illicit deals in cultural objects as crimes of the powerful. *Crime, Law and Social Change*, 56(2), Article 2. <https://doi.org/10.1007/s10611-011-9317-2>

- Mackenzie, S. (2011b). The Market as Criminal and Criminals in the Market: Reducing Opportunities for Organised Crime in the International Antiquities Market. In S. Manacorda & D. Chappell (Eds.), *Crime in the Art and Antiquities World: Illegal Trafficking in Cultural Property* (pp. 69–85). Springer. https://doi.org/10.1007/978-1-4419-7946-9_4
- Mackenzie, S. (2014). Conditions for Guilt-Free Consumption in a Transnational Criminal Market. *Eur J Crim Policy Res*, 20, 503–515. [https://doi.org/DOI 10.1007/s10610-013-9229-z](https://doi.org/DOI%2010.1007/s10610-013-9229-z)
- Mackenzie, S. (2020). Introduction: Trafficking as Transnational Crime. In *TRANSNATIONAL CRIMINOLOGY - Trafficking and Global Criminal Markets* (pp. 1–20). Bristol University Press. <https://doi.org/10.51952/9781529203851>
- Mackenzie, S., Brodie, N., Yates, D., & Tsirogiannis, C. (2019). *Trafficking Culture: New Directions in Researching the Global Market in Illicit Antiquities*. Routledge. <https://doi.org/10.4324/9781315532219>
- Mackenzie, S., & Davis, T. (2014). Temple Looting in Cambodia: Anatomy of a Statue Trafficking Network. *The British Journal of Criminology*, 54(5), 722–740. <https://doi.org/10.1093/bjc/azu038>
- Mackenzie, S., & Green, P. (2007). *Criminalising the Market in Illicit Antiquities: An Evaluation of the Dealing in Cultural Objects (Offences) Act 2003*. <http://ssrn.com/abstract=1004267>
- Mackenzie, S., & Yates, D. (2016a). Collectors on illicit collecting: Higher loyalties and other techniques of neutralization in the unlawful collecting of rare and precious orchids and antiquities. *Theoretical Criminology*, 20(3), Article 3. [https://doi.org/DOI: 10.1177/1362480615607625](https://doi.org/DOI:10.1177/1362480615607625)
- Mackenzie, S., & Yates, D. (2016b). Trafficking cultural objects and human rights. In *The Routledge International Handbook of Criminology and Human Rights*. Routledge.
- Mackenzie, S., & Yates, D. (2017). What is grey about the “grey market” in antiquities. In *The architecture of illegal markets: Towards an economic sociology of illegality in the economy* (pp. 70–86).
- Marlowe, E. (2016). What We Talk About When We Talk About Provenance: A Response to Chippindale and Gill. *International Journal of Cultural Property*, 23(3), 217–236. <https://doi.org/10.1017/S0940739116000175>
- McBarnet, D. (2001). When compliance is not the solution but the problem: From changes in law to changes in attitude. *Working Papers. Centre for Tax System Integrity*, 18. <https://core.ac.uk/reader/156615690>
- McBarnet, D. (2006). After Enron will ‘Whiter than White Collar Crime’ Still Wash? *The British Journal of Criminology*, 46(6), 1091–1109. <https://doi.org/10.1093/bjc/azl068>
- McBarnet, D., & Whelan, C. (1991). The Elusive Spirit of the Law: Formalism and the Struggle for Legal Control. *Modern Law Review*, 54, 848.

- McGeough, K. (2024). Victorian Popular Culture in Twenty-First-Century Archaeological Media. In *The Routledge Handbook of Archaeology and the Media in the 21st Century*. Routledge.
- McGeough, K. M. (2015a). *The Ancient Near East in the Nineteenth Century: Appreciations and Appropriations: Vol. I. Claiming and Conquering*.
- McGeough, K. M. (2015b). *The Ancient Near East in the Nineteenth Century Appreciations and Appropriations: Vol. II. Collecting, Constructing, and Curating*.
- McRobbie, A., & Thornton, S. L. (1995). Rethinking 'moral panic' for multi-mediated social worlds. *The British Journal of Sociology*, 46(4), Article 4.
- Merryman, J. H. (1986). Two Ways of Thinking About Cultural Property. *The American Journal of International Law*, 80(4). <http://www.jstor.org/stable/2202065>
- Merryman, J. H. (2005). Cultural Property Internationalism. *International Journal of Cultural Property*, 12(1), 11–39. <https://doi.org/10.1017/S0940739105050046>
- Metzgar, M. (2024, March 28). What Can We Learn from the Fox in the Henhouse: A look at the Martin Schøyen Collection, Cultural Property Law, and the Cozy Cabal. *American Bar Association*. https://www.americanbar.org/groups/international_law/resources/newsletters/martin-schoyen-collection-cultural-property-law-cozy-cabal/
- Metzger, N. (2012a, August 16). Erbe in Gefahr; SYRIEN Aleppo war einst ein Zentrum jüdischer Gelehrsamkeit. Jetzt bedroht der Bürgerkrieg die Zeugnisse der Vergangenheit. *Jüdische Allgemeine*.
- Metzger, N. (2012b, September 18). Raubgut könnte aus verschollenem Tempel stammen. *Spiegel Online*. <https://www.spiegel.de/wissenschaft/mensch/raubgut-becher-koennte-aus-tempel-von-anschan-stammen-a-856561.html>
- Meyer, G. (2010, June 14). Auferstanden aus Tresoren. *Focus Magazin*.
- Molina, M. (2013). On the Location of Irisaḡrig*. In *From the 21st Century B.C. to the 21st Century A.D.: Proceedings of the International Conference on Sumerian Studies Held in Madrid 22-24 July 2010* (pp. 59–87). Eisenbrauns.
- Molina, M. (2020). The looting of Ur III tablets after the Gulf Wars. In *Dealing with Antiquity: Past, Present & Future RAI Marburg*. Ugarit-Verlag. <https://doi.org/10.13039/501100010198>
- Mooney, J., & Young, J. (2005). Imagining Terrorism: Terrorism and Anti-Terrorism Terrorism, Two Ways of Doing Evil. *Social Justice*, 32(1), 113–125.
- Müller-Karpe, M. (2006, February 18). Die Hehler werden sich freuen; Zahnlos: Deutschland will Handel mit Raubkunst verbieten. *Süddeutsche Zeitung*.

- Müller-Karpe, M. (2011a). *LAUNDERING ANTIQUITIES OF ILLEGAL ORIGIN: GERMANY'S STRUGGLE AGAINST RATIFYING THE UNESCO CONVENTION OF 1970*. 11 International Congress on "Cultural Heritage and New Technologies", Vienna.
- Müller-Karpe, M. (2011b, January 4). Keilschriftnachricht vom Klapperstorch; Eine 3000 Jahre alte Königsinschrift aus Raubgrabung wird an den Irak zurückgegeben. *Süddeutsche Zeitung*.
- Müller-Karpe, M. (2016, Mai). Mafiöse Strukturen im deutschen Antikenhandel. *Südwest Presse*.
- Munawar, N. A. (2023). Destruction of Cultural Heritage in Times of Conflict: The Case of Syria. In *The Routledge Handbook of Heritage Destruction* (pp. 302–312).
- Munawar, N. A. (2024). Time to decolonise: 'If not now', then when? *Journal of Social Archaeology*, 24(1), 3–12. <https://doi.org/10.1177/14696053231224321>
- Museumschef Hilgert zu Kulturgutraub. (2016, August 15). *Tagesspiegel*.
- Nelson, L. K., Burk, D., Knudsen, M., & McCall, L. (2021). The Future of Coding: A Comparison of Hand-Coding and Three Types of Computer-Assisted Text Analysis Methods. *Sociological Methods & Research*, 50(1), 202–237. <https://doi.org/10.1177/0049124118769114>
- Neumann, B. (2013). *Bericht der Bundesregierung zum Kulturgutschutz in Deutschland*.
- O'Keefe, P., & Prott, L. V. (with Internet Archive). (1992). *Law and the Cultural Heritage: Movement*. Lexis Law Publishing (Va). <http://archive.org/details/lawculturalherit0003patr>
- Owen, D. I. (2012). Censoring Knowledge: The Case for the Publication of Unprovenanced Cuneiform Tablets. In *Whose Culture?* (pp. 125–142). Princeton University Press.
- Parcak, S., Gathings, D., Childs, C., Mumford, G., & Cline, E. (2016). Satellite evidence of archaeological site looting in Egypt: 2002–2013. *Antiquity*, 90(349), 188–205. <https://doi.org/10.15184/aqy.2016.1>
- Plate, C. (2005, July 3). Sumerischer Terracotta-Löwenkopf im Angebot. *NZZ Neue Zürcher Zeitung*.
- Platen, H. (2009, July 7). Bis er bricht; Ein 4.500 Jahre alter Goldkrug hat einen Streit zwischen Zoll, Museum und dem Irak entfacht. *TAZ*.
- Prescott, C., & Rasmussen, J. M. (2020). Exploring the "cozy cabal of academics, dealers and collectors" through the Schøyen Collection. *Heritage*, 3(5), Article 5. <https://doi.org/doi:10.3390/heritage3010005>
- Prott, L. V. (2005). The International Movement of Cultural Objects. *International Journal of Cultural Property*, 12(2), 225–248. <https://doi.org/10.1017/S0940739105050125>
- Prott, L. V. (2012). *Strengths and Weaknesses of the 1970 Convention: An Evaluation 40 years after its adoption*. Second Meeting of States Parties to the 1970 Convention, Paris.

- Rattenborg, R. (2018). Configuring Mesopotamia: Regional Signifiers and the Many Locations of the 'Land Between the Rivers'. In *Mapping Ancient Identities—Methodisch-Kritische Reflexionen zu Kartierungspraktiken* (pp. 149–168).
- Raubbau am Gedächtnis der Menschheit. (2011, June 18). *Idsteiner Zeitung*.
- Reese, S. D. (2009). Finding Frames in a Web of Culture The Case of the War on Terror. In *Doing News Framing Analysis: Empirical and Theoretical Perspectives*.
- Rothe, D., & Muzzati, S. L. (2004). Enemies Everywhere: Terrorism, Moral Panic, and US Civil Society. *Critical Criminology*, 12, 327–350.
- Sabrine, I., Abdo, R., & Brodie, N. (2022). Some New Evidence Documenting the Involvement of Da'esh in Syria with the Illicit Trade in Antiquities. *Journal of Eastern Mediterranean Archaeology and Heritage Studies*, 10(2), Article 2.
- Said, E. W. (2003). *Orientalism* (25th Anniversary Edition). Random House.
- Saldana, J. (2013). *The Coding Manual for Qualitative Researchers* (2nd ed.). Arizona State University.
- Sarkis, M. (2012, June 7). Mehr als nur Kollateralschäden; Der syrische Bürgerkrieg hinterlässt Spuren am Kulturerbe. *Neue Zürcher Zeitung*.
- Schauerte, G. (2006, June 19). Kunstraub und Kunstkauf; Es bleibt die Einzelfallprüfung. *Süddeutsche Zeitung*.
- Schießl, M. (2015, August 8). Schlangen im Grab. *Der Spiegel*.
- Schmälzle, C. (2019, August 6). Die Sache mit den Ausfuhrpapieren. *Frankfurter Allgemeine Zeitung*.
- Schwarz, M. (2019, November 19). Kriminal-archäologe Michael Müller-Karpe ermittelt die wahre Herkunft antiker Stücke; DER SCHRECKEN DER SCHATZRAUBER. *BILD Regionalausgaben*.
- SDA. (2007, December 18). Verkauf einer irakischen Schrifttafel im Internet gestoppt Erstmalige Zusammenarbeit von BAK, Bundespolizei und eBay (Neu: Ganze Meldung). *SDA - Basisdienst Deutsch*.
- SDA. (2012, November 2). Alles echt und legal an der Antiken-Messe in Riehen BS. *SDA - Basisdienst Deutsch*.
- SDA. (2015a, June 29). UNESCO verabschiedet Erklärung gegen Zerstörung von Kulturerbe. *SDA - Basisdienst Deutsch*.
- SDA. (2015b, June 29). UNESCO verurteilt 'barbarische Angriffe' gegen Kulturstätten. *SDA - Basisdienst Deutsch*.
- Shoemaker, P. J., Vos, T. P., & Reese, S. D. (2019). Journalists as Gatekeepers. In *The Handbook of Journalism Studies* (2nd ed.). Routledge.

- Tsouparopoulou, C. (2008). *The Material Face of Bureaucracy: Writing, Sealing and Archiving Tablets for the Ur III State at Drehem* [PhD Thesis]. University of Cambridge.
- UNESCO. (1970). *UNESCO CONVENTION ON THE MEANS OF PROHIBITING AND PREVENTING THE ILLICIT IMPORT, EXPORT AND TRANSFER OF OWNERSHIP OF CULTURAL PROPERTY*.
- United Nations. (2011). *A/HRC/17/38: Report on access to cultural heritage as a human right*. OHCHR. <https://www.ohchr.org/en/documents/thematic-reports/ahrc1738-report-access-cultural-heritage-human-right>
- Unsere Forderungen*. (2016). Aktionsbündnis Kulturgutschutz. <http://www.kulturgutschutz.info/unsere-forderungen>
- Van Gorp, B. (2009). Strategies to Take Subjectivity Out of Framing Analysis. In *Doing News Framing Analysis: Empirical and Theoretical Perspectives*.
- von Riegen, O. (2014, Oktober). ‘An diesen Dingen klebt Blut’; ANTIKENKÄUFE Archäologe warnt vor Handel mit illegalen Kulturgütern / Geldquelle für Terroristen. *Idsteiner Zeitung*.
- Vosoughi, S., Roy, D., & Aral, S. (2018). The spread of true and false news online. *Science*, 359(6380), 1146–1151.
- Waldron, D. (2005). Role-Playing Games and the Christian Right: Community Formation in Response to a Moral Panic. *Journal of Religion and Popular Culture*, XI.
- Walsh, J. P. (2017). Moral panics by design: The case of terrorism. *Current Sociology*, 65(5), Article 5. <https://doi.org/10.1177/0011392116633257>
- Wartenberg, U., & Dmitričenko, B. (2022). Plenitudinous: An Analysis of Ancient Coin Sales on eBay. In *Antiquities Smuggling in the Real and Virtual World*. Routledge.
- Waser, G. (1997, April 15). Raubkunst—Unvergangene Vergangenheit; Gewinner sind die Dunkelmaenner; Der Antikenschmuggel heute: Wege und Methoden. *Neue Zuercher Zeitung*.
- Waser, G. (2003, Mai). Keine Identität ohne Geschichte. *NZZ Neue Zürcher Zeitung*.
- Waser, G. (2015, February 12). Wenn mit Kulturerbe für Waffen bezahlt wird; Der illegale Kunsthandel als Geldquelle des Terrors im Nahen Osten. *NZZ Neue Zürcher Zeitung*.
- Wessel, G. (2015, November 26). Die Beute des Abu Sajjaf; Der IS finanziert seinen Terror auch mit dem Antikenschmuggel. Jetzt gibt es neue Beweise für das Ausmaß des Verbrechens. *Die Zeit*.
- Westenholz, A. (2010). Illicit Cuneiform Tablets: Heirlooms or Stolen Goods. In *Why should someone who knows something conceal it?: Cuneiform studies in honor of David I. Owen on his 70th birthday* (pp. 257–266).
- White, S. (1998). A collector’s odyssey. *International Journal of Cultural Property*, 7(1), 170–176. <https://doi.org/10.1017/S094073919877016X>

- Wiegmann, L. (2016, April 15). House of Charts; Nach monatelangem öffentlichem Streit muss sich nun der Bundestag eine Meinung zum komplizierten Kulturgutschutzgesetz bilden. Ein Ortstermin im Ausschuss. *Die Welt*.
- Yates, D. (2012). *Archaeological practice and political change: Transitions and transformations in the use of the past in nationalist, neoliberal and indigenous Bolivia* [Doctoral Dissertation]. University of Cambridge.
- Yates, D. (2014). Church Theft, Insecurity, and Community Justice: The Reality of Source-End Regulation of the Market for Illicit Bolivian Cultural Objects. *European Journal on Criminal Policy and Research*, 20(4), 445–457. <https://doi.org/10.1007/s10610-014-9232-z>
- Yates, D. (2015a). Museums, collectors, and value manipulation: Tax fraud through donation of antiquities. *Journal of Financial Crime*, 23(1), 173–186. <https://doi.org/10.1108/JFC-11-2014-0051>
- Yates, D. (2015b). Reality and Practicality: Challenges to Effective Cultural Property Policy on the Ground in Latin America. *International Journal of Cultural Property*, 22(2–3), 337–356. <https://doi.org/10.1017/S0940739115000156>
- Yates, D. (2017). Some thoughts on the Hobby Lobby antiquities case. *Anonymous Swiss Collector*. <https://www.anonymousswisscollector.com/2017/07/some-thoughts-on-the-hobby-lobby-antiquities-case.html>
- Yates, D., & Brodie, N. (2023). The Illicit Trade in Antiquities is not the World’s Third Largest Illicit Trade: A Critical Evaluation of a Factoid. *Antiquity*, 97(394), 991–1003. <https://doi.org/10.15184/aqy.2023.90>
- Yates, D., Mackenzie, S., & Smith, E. (2017). *The cultural capitalists: Notes on the ongoing reconfiguration of trafficking culture in Asia*. 1–10. <https://doi.org/10.1177/1741659017700947>
- Yates, D., & Smith, E. (2020). Antiquities Trafficking and the Provenance Problem. In *Collecting and Provenance: A Multidisciplinary Approach* (pp. 385–394). Rowman & Littlefield. <https://traffickingtransformations.org/publications/academic-publications/antiquities-trafficking-and-the-provenance-problem/>
- Zekri, S. (2005a, Dezember). Der Hehlerstaat; Deutschland ist ein Umschlagplatz für Kunst aus Raubgrabungen. *Süddeutsche Zeitung*, 1157 words, S. 11.
- Zekri, S. (2005b, November 30). Archäologie am Boden; Terror verhindert Ausgrabungen. *Süddeutsche Zeitung*.
- Zick, M. (2011, July 7). Das Milliardengeschäft der Raubgräber; Weltweit wird illegal mit antiken Kunstschätzen gehandelt. Ein deutscher Archäologe kämpft gegen Hehler. *Tagesspiegel*.
- Zimmermann, F. (2014, Dezember). Der ‘Islamische Staat’ und die Antiken; Vom Millionenraub, der sich nicht belegen lässt. *Die Zeit*.

Zimmermann, F., & Timm, T. (2014, Dezember). Der Schaden ist unermesslich. *Die Zeit*.AFP.
(2002, November 5). Afghanische Behoerden vereiteln Kunstschnuggel in grossem Stil—
Kulturgegenstaende sichergestellt. *AFP German*.