

# LEGAL COMMENTARIES

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## Regulation (EU) 2019/880 and the 1970 UNESCO Convention – A Note on the Interplay between the EU and UNESCO Import Regimes

**Abstract:** The 1970 UNESCO Convention is the key international instrument to protect movable cultural heritage. States Parties to this treaty undertake to adopt measures to prohibit and prevent the illicit trade in such objects, as well as those designed to stop the import of unlawfully exported cultural goods. The EU, as an important UNESCO partner and a powerful regional organization, has been urged since the 2000s by many international actors as well as its own institutions to curb the illicit transfer of cultural goods within its boundaries, especially in the light of the influx of cultural material illicitly removed from conflict-ridden territories. Regulation (EU) 2019/880 on the introduction and the import of cultural goods may be seen as providing a long-awaited legal framework that would promote and strengthen the operation of 1970 UNESCO Convention,

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both in Europe and globally. Thus, there is a significant interplay between the UNESCO and the EU cultural goods import regimes, which this note endeavours to analyse.

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**Keywords:** import and export of cultural goods, Regulation (EU) 2019/880, the 1970 UNESCO Convention, European Union, UNESCO, illicit trade

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## Introduction

The Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property (“1970 UNESCO Convention”)<sup>1</sup> is the fundamental international treaty designed to curb the illicit trade and transfer of cultural material. Long contested by key art market countries (many of them being former colonial powers), it has already gained 141 States Parties (as of December 2021). The regime of the 1970 UNESCO Convention is founded on three “main pillars”: preventive measures (States Parties undertake the obligation to enforce the security and safety of cultural property in their respective territories); provisions prohibiting import of cultural property illicitly removed from another State Party to this treaty combined with the duty to assist each other in recovering such objects; and international cooperation (States Parties shall provide assistance and cooperate with one another within the scope of prohibiting and preventing the illicit import, export, and transfer of ownership of cultural property). Throughout the 50 years of operationalization of the 1970 UNESCO Convention, these obligations have been taken up to varying degrees in state practice.<sup>2</sup> In particular, the obligations to effectively deter imports of illicitly exported cultural objects appear to have posed the greatest challenges to domestic law.<sup>3</sup>

This short note provides an overview of the impact of the 1970 UNESCO Convention on the Regulation (EU) 2019/880 of the European Parliament and of the Council of 17 April 2019 on the introduction and the import of cultural goods (“Regulation (EU) 2019/880”, or sometimes “Regulation”).<sup>4</sup> Indeed, the European Union

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<sup>1</sup> 14 November 1970, 823 UNTS 231.

<sup>2</sup> See P.J. O’Keefe, *Commentary on the 1970 Convention*, 2nd ed., Institute of Art and Law, Builth Wells 2007, pp. 98-165.

<sup>3</sup> See B. Torggler et al., *Evaluation of UNESCO’s Standard-setting Work of the Culture Sector. Part II – 1970 Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property. Final Report*, April 2014, UNESCO Doc. IOS/EVS/PI/133 REV, paras. 93-97; also see J.A.R. Nafziger, *International Trade in Cultural Material*, in: J.A.R. Nafziger, R.K. Paterson (eds.), *Handbook on the Law of Cultural Heritage and International Trade*, Edward Elgar, Cheltenham–Northampton 2014, pp. 39-43.

<sup>4</sup> OJ L 151, 7.06.2019, p. 1.

(EU), as an important UNESCO partner and a powerful regional organization, has been urged since the 2000s by many international actors as well as its own institutions to curb the illicit transfer of cultural goods within its boundaries, especially in the light of the influx of cultural material illicitly removed from conflict-ridden territories.<sup>5</sup> While the EU has already adopted a number of instruments to combat the illicit trade in cultural property as part of the global agenda for peace, security, and the struggle against organized crime and terrorism, Regulation (EU) 2019/880 constitutes the first complex regime under EU law aimed at stopping the flow of illicit cultural objects to the EU customs territory. In this regard, the Regulation may be seen as providing a long-awaited legal framework that would promote and strengthen the operation of the 1970 UNESCO Convention, both in Europe and globally.

## The Background of Regulation (EU) 2019/880

The adoption of Regulation (EU) 2019/880 occurred during a difficult period of conflicts and unrest which also affected the EU's immediate neighbourhood. The conflicts in Iraq, Afghanistan, Syria, Libya, Yemen, Mali have been marked by widespread pillage of cultural heritage sites and institutions. Apparently, much of the looting has been committed by terrorist organizations (e.g. ISIS) using trade in stolen cultural goods, very often to the European black art market, as a source of financing.<sup>6</sup> As reported by the *World Heritage* magazine in 2018: "since 2011, approximately 25 per cent of Syria's archaeological sites have been pillaged. Objects from conflict regions, including from Iraq, Syria, Libya, Yemen and Mali are circulating on the black market and are already in unscrupulous hands".<sup>7</sup> These worrying data were reflected also in the EU's 2020 Security Union Strategy, which states that "trafficking in cultural goods has become one of the most lucrative criminal activities and a source of funding for terrorists as well as organised crime".<sup>8</sup> While a precise assessment of the lucrateness of the black art market is of course not possible, it is widely believed to be one of the most firmly-rooted illicit trades in the world, together with drugs and weapons.<sup>9</sup> The EU itself is a place where these lu-

<sup>5</sup> S. Urbinati, *The European Union Legal Framework and the Fight against the Illicit Trafficking of Cultural Property Coming from Situations of Armed Conflict*, "Santander Art and Culture Law Review" 2018, Vol. 2(4), pp. 51-70.

<sup>6</sup> D. Kees, *ISIS the Art Dealer*, "The Regulatory Review", 13 April 2020, <https://www.theregreview.org/2020/04/13/kees-isis-art-dealer/> [accessed: 21.01.2022].

<sup>7</sup> M. Rössler, *Editorial*, "World Heritage" 2018, Vol. 87, p. 1.

<sup>8</sup> European Commission, *Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions on the EU Security Union Strategy*, 24 July 2020, COM(2020) 605 final.

<sup>9</sup> It has however been argued that existing assessments are not based on any reliable data: N. Brodie et al., *Why There Is Still an Illicit Trade in Cultural Objects and What We Can Do About It*, "Journal of Field Archaeology" 2021, DOI: 10.1080/00934690.2021.1996979.

crative criminal activities are being pursued, as the EU's art market constitutes 12% of the global art market (with France being a leader), and is the second in Europe after the UK (with 20% of global art market).<sup>10</sup> The existing patchwork of national rules regulating import and export of cultural objects, varying from one EU Member State to another, favoured the development of trafficking routes through the more vulnerable and unregulated parts of the EU ("port-shopping").<sup>11</sup> In these circumstances, the growing awareness of this problem within the EU spurred and enhanced its legal actions towards halting the rise of the black art market in the EU<sup>12</sup> – actions greatly coordinated with other international actors, particularly UNESCO.

## The Relevance of the 1970 UNESCO Convention Regime for Regulation (EU) 2019/880

There is no doubt that Regulation (EU) 2019/880 represents a profound change in EU cultural heritage legislation, as it places severe restrictions on the entry of cultural goods from third countries to the EU, regardless of the level of knowledge, belief, or suspicion of the importer. It does not apply to cultural goods which were either created or discovered in the customs territory of the EU (Article 1), unlike Regulation (EC) 116/2009 (export of cultural goods)<sup>13</sup> which covers all cultural goods located within EU territory, regardless of their country of origin. In addition, the new Regulation applies very broadly to all unlawful exports, regardless of when those exports occurred. It thus may be seen as constituting a regional component of UNESCO's global system to combat the illicit trafficking of cultural property. It must also be read and implemented in the light of the 1970 UNESCO Convention, which was the real backbone of this new EU instrument. In fact, the definitions and concepts used in Regulation (EU) 2019/880 and Regulation (EU) 2021/1079 implementing its provisions<sup>14</sup> are based on concepts well-established in the 1970 UNESCO Convention.

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<sup>10</sup> <https://www.statista.com/statistics/1223977/global-art-market-share-in-the-uk-and-eu-27/> [accessed: 21.01.2022].

<sup>11</sup> European Commission, *Questions and Answers on the Illegal Import of Cultural Goods Used to Finance Terrorism*, 13 July 2017, [https://ec.europa.eu/commission/presscorner/detail/en/MEMO\\_17\\_1954](https://ec.europa.eu/commission/presscorner/detail/en/MEMO_17_1954) [accessed: 21.01.2022].

<sup>12</sup> For more on this matter, see S. Urbinati, *op. cit.* See also two *ad hoc* regulations prohibiting trade in cultural goods from Iraq and Syria: Council Regulation (EC) No. 1210/2003 of 7 July 2003 concerning certain specific restrictions on economic and financial relations with Iraq, OJ L 169, 8.07.2003, p. 6 (Article 3); Council Regulation (EU) No. 36/2012 of 18 January 2012 concerning restrictive measures in view of the situation in Syria, OJ L 16, 19.01.2012, p. 1 (Article 11c).

<sup>13</sup> Council Regulation (EC) No. 116/2009 of 18 December 2008 on the export of cultural goods (Codified version), OJ L 39, 10.02.2009, p. 1.

<sup>14</sup> Commission Implementing Regulation (EU) 2021/1079 of 24 June 2021 laying down detailed rules for implementing certain provisions of Regulation (EU) 2019/880 of the European Parliament and of the Council on the introduction and the import of cultural goods, OJ L 234, 2.07.2021, p. 67.

UNESCO is also mentioned in the text of Regulation (EU) 2019/880 as the first and most important partner in the EU in matters related to ensuring effective coordination and avoiding duplication of efforts when organizing training, capacity building activities, and awareness-raising campaigns, as well as when commissioning relevant research and the development of standards (Preamble, 23rd Recital).<sup>15</sup>

It is also important to note that almost all EU Member States are also States Parties to the 1970 UNESCO Convention. The only remaining EU members which are non-parties are Ireland and Malta. Thus, the definitions used in the 1970 UNESCO Convention, to which 25 of the 27 EU Member States are parties, are already well-known and established in the majority of them: only Luxembourg (2015), Austria (2015), and Latvia (2019) ratified the 1970 UNESCO Convention within the last 10 years. This groundwork was cited in the Preamble (7th Recital) to Regulation (EU) 2019/880, which states that:

Many third countries and most Member States are familiar with the definitions used in the UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property signed in Paris on 14 November 1970 (“the 1970 UNESCO Convention”) to which a significant number of Member States are a party, and in the UNIDROIT Convention on Stolen or Illegally Exported Cultural Objects signed in Rome on 24 June 1995. For that reason the definitions used in this Regulation are based on those definitions.

This explains why the Annex to the Regulation contains a combination of definitions of cultural goods (cultural property) as provided in Article 1 of the 1970 UNESCO Convention as well as in the Annex of the UNIDROIT Convention on Stolen or Illegally Exported Cultural Objects.<sup>16</sup> For the purposes of Regulation (EU) 2019/880, “cultural goods” means any item which is of importance for archaeology, prehistory, history, literature, art, or science as listed in the Annex (Article 2). The clause of most importance for the listed scientific fields and disciplines derives from Article 1 of the 1970 UNESCO Convention, though the Convention uses the term “cultural property” instead of “cultural goods”. The Annex to Regulation (EU) 2019/880 introduces one general list of “cultural goods” in Part A. If such goods “were removed from the territory of the country where they were created or discovered in breach of the laws and regulations of that country” their introduction to the customs territory of the EU shall be prohibited (Article 3). At the same time, if the goods to be imported belong to one of the two very detailed, internally diverse, and only partially overlapping sets of “cultural goods” listed under Part B and Part C of the Annex to Regulation (EU) 2019/880, their import shall be permitted only upon the provision of either: an import licence issued in accordance

<sup>15</sup> Other organizations mentioned include: INTERPOL, EUROPOL, the World Customs Organization, the International Centre for the Preservation and Restoration of Cultural Property, and the International Council of Museums (ICOM).

<sup>16</sup> 24 June 1995, 34 ILM 1322.

with Article 4 (goods listed under Part B), or an importer statement submitted in accordance with Article 5 (goods listed under Part C).

Concerning the differences in the importer's obligations in relation to the different types of cultural goods, it should be noted that these depend on the age (Part B of the Annex: i.e. archaeological objects or parts of monuments at least 250 years old regardless of the value of these objects require import licence) and monetary values thresholds established (Part C of the Annex: i.e. zoological or botanical collections, coins, ethnographic objects, paintings, sculptures, manuscripts and books that are older than 200 years and have a value above €18,000 require an importer statement).

Another important impact of the 1970 UNESCO Convention on Regulation (EU) 2019/880 regards the obligations under Article 5 of the said treaty concerning a number of measures to be taken by States Parties to protect movable heritage situated on their respective territories (formation of laws and regulations; establishment of national inventories; development and establishment of scientific and technical institutions; organizing the supervision of archaeological excavations; promotion of ethical standards; and taking educational measures and publicity). These requirements are reflected in the text of Regulation (EU) 2019/880. For instance, as stated in Article 4(11) of this instrument, competent authorities are to be established for the issuance of import licences. Similar requirements appear in relation to customs offices (Article 6). Both authorities and customs offices shall remain in administrative cooperation (Article 7). However, the real scope of the obligations of these authorities is not listed in the Regulation itself. These obligations are to be found in Article 5 of the 1970 UNESCO Convention. At the same time, they still remain very challenging, and the expertise, knowledge, and specific skills expected from the authorities responsible for preventing illicit trafficking of cultural property are frequently lacking.<sup>17</sup>

The 1970 UNESCO Convention entered into force on 24 April 1972. Thus this date is introduced in Regulation (EU) 2019/880 as a cut-off date.<sup>18</sup> It is one of rare examples of legal acts concerning cultural heritage in which a date of entry into force of another legal act adopted by a separate organization (UNESCO) is used as creating new legal situation for a different legal environment (EU). This situation also proves the important place of the 1970 UNESCO Convention in the European legal cultural heritage framework.

In the case of import licences, according to Article 4(4) the holder of goods covered by Regulation (EU) 2019/880 needs to apply for an import licence to the competent authority of the Member State. Such application

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<sup>17</sup> See N. Brodie et al., op. cit.

<sup>18</sup> See R. Peters, *Preventing Trafficking in Cultural Property: Import and Export Provisions as Two Sides of the Same Coin*, "Santander Art and Culture Law Review" 2019, Vol. 2(5), p. 105.

shall be accompanied by any supporting documents and information providing evidence that the cultural goods in question have been exported from the country where they were created or discovered in accordance with the laws and regulations of that country or providing evidence of the absence of such laws and regulations at the time they were taken out of its territory.

This rule might be derogated in two cases: either when the country where the cultural goods were created or discovered cannot be reliably determined; or when the relevant cultural goods left the country where they were created or discovered before 24 April 1972. In these cases the application may be accompanied by supporting “documents and information providing evidence that the cultural goods in question have been exported in accordance with the laws and regulations of the last country where they were located for a period of more than five years and for purposes other than temporary use, transit, re-export or transshipment” (Article 4(2)).

A similar situation appears in the case of the importer statement. According to Article 5(2) of Regulation (EU) 2019/880, the importer statement shall consist of two documents: “a declaration signed by the holder of the goods stating that the cultural goods have been exported from the country where they were created or discovered in accordance with the laws and regulations of that country at the time they were taken out of its territory”, and “a standardised document describing the cultural goods in question in sufficient detail for them to be identified by the authorities and to perform risk analysis and targeted controls”. However, there is an exemption from this requirement, according to which the declaration may instead state that the cultural goods in question have been exported in accordance with the laws and regulations of the last country where they were located for a period of more than five years and for purposes other than temporary use, transit, re-export, or transshipment, in the following cases: “the country where the cultural goods were created or discovered cannot be reliably determined”, or “the cultural goods were taken out of the country where they were created or discovered before 24 April 1972”.

Clearly, the aim of the above-mentioned regulatory choice is to avoid situations where cultural goods can be moved to countries with no protective legislation in order to by-pass the export prohibitions or restrictions of the source country (a form of “laundering” of the cultural good).<sup>19</sup> The fifty years of functioning of the 1970 UNESCO Convention are considered as a sufficient time for its States Parties to have introduced adequate measures of control – and this is indeed reflected in Regulation (EU) 2019/880 in its provisions establishing the new cut-off date of 24 April 1972.

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<sup>19</sup> Compare: European Commission, *Questions and Answers...*

Conclusions

In light of the above short discussion, an open question remains whether the steps taken by the EU could be seen as “trend-setting” for other regions of the world in terms of offering novel standards aimed at protecting heritage from the threats of the illicit import, export, and transfer of ownership of cultural property.<sup>20</sup> This is unfortunately hardly the case,<sup>21</sup> as the political, legal, and economic structure of the EU is quite unique. Also, the technological tools needed for making the import system operational are yet to be developed – so its effectiveness is not tested yet. The lack of economic resources and specialists within the relevant agencies has been noted and recorded in many locations in the world,<sup>22</sup> and this is definitely the primary weakness in the regional and global efforts to combat the illicit trafficking of cultural goods. This diagnosis applies as well to many EU Member States. The unique combination of expertise, knowledge, and skills remains very rarely present on a large scale – and such a scale is needed in order to make the whole system effective.<sup>23</sup>

What is important, however, is that the efforts undertaken by the EU do not go unnoticed: debates on these problems in other regions of the world do occur and might be perceived as crucial for – at least – awareness-raising.<sup>24</sup> According to Article 12 (Cooperation with third countries) of Regulation (EU) 2019/880: “[t]he Commission may, in matters covered by its activities and to the extent required for the fulfilment of its tasks under this Regulation, organise training and capacity building activities for third countries in cooperation with Member States”. Therefore, the main hope of the new Regulation is that this instrument and its practice will support and contribute to a change of attitudes among buyers, who will learn to expect from importers and dealers in cultural goods some form of documentation providing information on the provenance and guaranteeing the legitimate character of the goods.<sup>25</sup>

It should be noted however that similar hopes were present when the 1970 UNESCO Convention was adopted. The recent diagnosis of the real problems of the whole international system aimed at combatting the illicit trade of cultural

<sup>20</sup> See R.M.G. Scott, *The European Union’s Approach to Trade Restrictions on Cultural Property: A Trendsetter for the Protection of Cultural Property in Other Regions?*, “Santander Art and Culture Law Review” 2016, Vol. 2(2).

<sup>21</sup> N. Oosterman, D. Yates, *Policing Heritage Crime in Latin America*, “Revista de Direito Internacional” 2020, Vol. 17(3), <https://www.publicacoes.uniceub.br/rdi/article/view/7030> [accessed: 21.01.2022].

<sup>22</sup> Ibidem.

<sup>23</sup> For more on this matter, see N. Brodie et al., op. cit.

<sup>24</sup> E.g. Global Initiative, *Culture in Ruins: The Illicit Trade in Cultural Property in North and West Africa*, 20 November 2020, <https://globalinitiative.net/analysis/culture-in-ruins-the-illicit-trade-in-cultural-property-in-north-and-west-africa/> [accessed: 21.01.2022].

<sup>25</sup> European Commission, *Questions and Answers...*

goods shows that without a more profound change of its paradigm even best legal regulations will remain ineffective and insufficient.<sup>26</sup> While the EU's new import Regulation has to be praised for enhancing the globally established UNESCO regime with its more concrete regional regulations, its impact and effectiveness has yet to be seen.

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<sup>26</sup> N. Brodie et al., op. cit.

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