Iranian antiquities in the Netherlands in the second half of the 20th century: provenance and context

Pien Bergshoeff

Cover page: Photograph from the archive of collector Kees Kremer of his sons digging at Sakkizabad

Pien Bergshoeff

Hoogte Kadijk 36

1018BM, Amsterdam

pienbergshoeff@gmail.com
+31621237804

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Pien Rosalie Maria Bergshoeff
S1430874

MA Thesis Archaeology
Dr. M. Françozo
MA Museum Studies and Heritage Management
University of Leiden, Faculty of Archaeology

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Preface

For this thesis I feel very grateful for the help of a lot of people. Without the stories of collectors and relatives of collectors this thesis would have missed an important extra layer of understanding the context of collecting. I would like to thank Kora Kremer for inviting me into her home, for showing me Kees Kremer's collection and taking the time to recall everything she still remembered of their father. Her detailed stories enabled me to get an impression of what it was really like to live in Iran and to collect objects. Besides the Kremers, I would like to thank Ms. Hillegonda Janssen for her generous time and first-hand account and Guido van den Boorn for providing me with a perspective from the RMO.

Mariana Françozo has been a great supervisor that encouraged me to explore all angles before focussing on one idea only and who provided me with a lot of useful feedback that challenged me to learn more. With the assistance of Lucas Petit, I was able to go to the archives of the RMO in the summer of 2020. Petit also helped me to critically assess my own writing and to use different theoretical perspectives.

Writing a thesis during Covid-19 pandemic, without being able to go to university for over a year, turned out to be more difficult than I expected it to be, both mentally and practically. Therefore, I am even more grateful that the abovementioned people were so willing to help me with my research.

1. Introduction

1.1 Problem statement

Generally, when one visits a traditional archaeological museum in a Western European country, one will notice that there is a focus on the archaeological object itself and the narrative associated with it. One will learn about its use and its style, and throughout the exhibition one might be immersed in another time in history. However, there is often little or no information available on how this object came to be there in the first place. In fact, every object in a museum has a 'double historicity of its existence before and after the act of accessioning' (Hicks 2020, 14). Many people feel a sense of unease about the large number and quality of objects coming from all over the world on display in museums, yet they cannot exactly place this feeling. This could be because of a lack of awareness on how objects were acquired in the past.

There is increased awareness of the reality that archaeological museums worldwide are filled with antiquities with an incomplete or questionable provenance, or without any provenance at all (Brodie 2005; Renfrew 2000; Muscarella 2000; Hicks 2020). In such instances, there is no certainty that an object has not been looted in the past. Provenance refers to the history of ownership of an object and looting is defined as 'the illegal removal of culturally significant material from archaeological sites' (Bowman Proulx 2013). Because of this reality, there is a need for more research into the provenance of objects and the historical context in which collections were acquired.

Many antiquities were acquired without provenance in the past, since there were almost no ethical guidelines and there was often limited legislation that restricted trade in such objects. In the 1970s, the attitude towards the acquisition of unprovenanced antiquities gradually started to change, triggered by growing international criticism of the destruction of cultural heritage. Ongoing criticism eventually led to the drawing up of the 1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property. However, the convention is not binding and, without implementation in national laws, it does not necessarily have any legal consequences. Nevertheless, it did impact the way in which provenance of antiquities slowly became more important and, in turn, objects with a provenance often became more expensive for museum to acquire. Many museums started acquiring fewer antiquities than previously in the last decades of the 20th century (Garrison 2012, 27-28).

In this worldwide scenario, however, there was a noticeable increase in the acquisition of Iranian antiquities by Dutch museums in the 1980s. The quality of the collections that were acquired as a whole also increased. Some of them are even regarded as being among the most important Iranian collections in Europe (Petit 2018, 431-433). The curator of the Rijksmuseum van Oudheden (RMO), Lucas Petit, wrote an article about Dutch private collectors who acquired Iranian antiquities (Petit 2018, 431-433). It is notable that none of them were scientifically excavated; almost all of them had been acquired by Dutch

private collectors and later made their way into museum holdings. Petit also refers to the renewal of the Near Eastern gallery at the RMO in 2013, during which the museum tried to provoke discussion among visitors by including texts on the acquisition history of objects and collection ethics, forgeries and excavations (Petit 2013; Petit 2018).

This thesis uses Petit's observations from his research as a starting point and will go into further depth by describing and analysing the context and provenance of Iranian objects at the RMO in detail. More specifically, the focus of this thesis is on three important Dutch collectors of Iranian antiquities: Jacob van Lier, Kees Kremer and Hillegonda Janssen – who they were, how they acquired the objects in question and why they collected them.

The Dutch museums that have acquired objects from Iran are the Rijksmuseum van Oudheden (RMO) in Leiden, the Allard Pierson in Amsterdam (AP) and the Princessehof in Leeuwarden. The largest collection from Iran is currently at the RMO and comprises about 3,700 objects. The Princessehof owns 335 objects and the AP 95. The RMO contains the most, and the most important antiquities by far; thus, the focus of this thesis is the RMO and its collecting practices.

Today, policies regarding acquiring antiquities have become stricter and most museums have some form of ethical guidelines. However, the looting and trade of looted objects is still problematic and it would be beneficial to research the deeper lying issues in regard to the trade and display of unprovenanced objects.

The latter could for instance set a bad example, even if the unprovenanced objects were acquired decades ago before the 1970 convention. According to Elia (2009) there is also a causal relationship between the market opportunities of the antiquities offered for sale and the present-day looting of archaeological sites (Elia 2009, 241). Iran is one of the many countries that continues to struggle with extensive looting.

Secondly, the background of acquiring unprovenanced objects is often accompanied by a painful history related to colonialism. There is a possibility that an unprovenanced object could have been looted in the past. Looting and the unequal flow of the direction in the antiquities trade is, to a large extent, related to the historical political climate and the former involvement of colonial powers in Iran (Al Quntar 2017, 20).

Because of the complexity of retracing the origins of potentially looted objects, and the scope and ease with which looting occurred, the problems are often dismissed with the use of easy, standard arguments. For example, in a discussion about the return of objects, director Guido Gryseels from the KMKG Museum in Brussels talks about the return of the Iranian Maleki collection in an article, a case that will be further discussed in this thesis. Gryseels states that 'the museums in the country of origin are not well enough equipped to house an artefact', and that 'we are already doing the best we can by educating and investing in the archaeological personnel of the country of origin'. He goes on to ask, 'Should a country also ask for return of objects that were taken by Napoleon while he conquered Belgium?'(Vancoppenole 2015).

Gryseels focuses on what he thinks the museum is already trying to do and dismisses the case as a hopeless one, without elucidating the complexities of dealing with these objects or considering solutions. The argument that museums are not 'well enough equipped' to house artefacts can never be a valid one since the original owner of an object has the right to decide himself what to do with the object, whether the owner is a person, institution or country. Instead of using these arguments, objects should be scrutinised because their presence in museums is all too often rooted in some form of colonialism.

1.2 Research questions and structure of the thesis

To understand the manner in which Iranian antiquities were collected by collectors and eventually acquired by Dutch museums, two primary research questions were formulated for this study. Both questions were then subdivided into two sub-questions each:

1. **What was the context of collecting antiquities in Iran in the second half of the 20th century?**
   - 1.1 What was the socio-political landscape in Iran that made it possible to collect these objects?
   - 1.2 What kind of legislation existed during the second half of the 20th century regarding cultural heritage?

2. **What role did the Netherlands play within this context?**
   - 2.1 How were the objects acquired by Dutch museums?
   - 2.2 How and why were the objects collected by private Dutch collectors?

In the following section, the methods that form the basis of this thesis are explained. Following this, chapter 2 comprises an exploration of the theoretical framework that is required to understand the context. Postcolonial theory, looting and fakes are discussed in this chapter. Afterwards, in chapter 3, the context of Iran is analysed, with a focus on the first research question. In chapter 4, the focus shifts to the second research question in the form of an analysis of Dutch engagement in Iran and the Iranian collections in Dutch museums. For the second research question, the decision has been made to first examine which objects are currently in museums in order to provide the reader with an overview before going further in depth about the way objects were collected by Dutch collectors. In chapter 5, an account of the collectors is provided in as much detail as possible. In chapter 6, the results of this thesis are discussed. The legal and ethical aspects of the Dutch situation are explored and compared with the Iranian context from a postcolonial perspective. Finally, in chapter 7, a conclusion is provided in which the most important information gathered in this thesis is summarised and the future of the objects in question are briefly discussed.

1.3 Research methods

The research for this thesis comprised a literature review, archival research, museum database and inventory research, and interviews. A combination of quantitative and qualitative methods was used; however, the focus was on qualitative research methods. The latter is appropriate for this type of research, since it is about the context, which can best be discerned from personal accounts, whether through letters of correspondence from archives or from interviews.

As previously mentioned in the introduction, three museums were explored for this research that all own Iranian objects that were acquired by private collectors, namely the RMO in Leiden, the AP in Amsterdam and Keramiekmuseum Princessehof in Leeuwarden. However, the focus was on the RMO, since it has the largest collection and most important objects from Iran.

Moreover, the primary focus was on three collectors: Jacob van Lier (1901–1989), Hillegonda Janssen (1932–present) and Kees Kremer (1920–2005), since they had some of the most important and largest collections of Iranian antiquities that ended up in museums. Four other collectors were also briefly explored to contribute to the body of knowledge.

The data for chapters 2 and 3, namely the theoretical framework and the history of Iran, were derived mostly from literary sources. In chapters 4 and 5, about the Dutch side of the collecting of Iranian antiquities and about the collectors, the information was derived from the RMO archive, the National Archive in the Hague, interviews with the most important Dutch private collectors of Iranian objects, namely Jacob van Lier, Ms. Hillegonda Janssen and Kees Kremer, and from collection guides. The data sources are described in the section below.

The qualitative data was retrieved from:

- Guido van den Boorn's 1982 interview with Jacob van Lier. Data retrieved from a report of the interview in *Allard Pierson Magazine*.
- Interviews with Kora Kremer, daughter of Kees Kremer, on 12 September 2020 and 17 April 2021.
- Telephonic interview with Ms. Hillagona Janssen on 29 March 2021.
- Telephonic interview with Guido van den Boorn on 3 March 2021. Boorn was the curator of the Near Eastern Department at the RMO from 1980–1989.
- Archival material from the RMO, consisting of inventory documents and correspondence between 1950 and 1990 mainly from curator Guido van den Boorn.

- Archival documents from the former Dutch Embassy in Iran about archaeology, National Archive, the Hague: former Embassy of the Netherlands in Iran from 1956–1963 and 1968–1974. Retrieved on: 1 December 2020.
- Documents from the personal archive of Kees Kremer, retrieved from Kora Kremer on 12 September 2020.

Quantitative analysis was used to evaluate the data on the collection of Iranian objects by the RMO, AP and Princessehof. Tables and graphs were designed to illustrate the increase of Iranian artefacts, as indicated by the data.

There are some limitations to this research that should be mentioned. As a researcher, I am aware that I am of Dutch origin and that I have a Western background and education. Although I tried to use as many sources as possible representing a variety of perspectives, there was always a possibility of unconscious bias. By being aware of this reality, I hoped to limit biases as much as possible. One particular limitation was the fact that I could not read Persian and therefore could not consult Persian sources as a reference. Luckily, many Persian scholars had translated or written texts into French or English as well, but those that had not been translated could not be consulted.

Secondly, I am aware of the fact that the data from the interviews and letters of correspondence from archives are subjective and do not necessarily depict reality in the same way as other subjects would have experienced it. Moreover, the information derived from the interviews are accounts of events that happened more than 40 years ago as told in the present to this researcher. This could mean that some memories of events are not remembered in full detail or with full certainty. However, since the accounts of the collectors and other actors were analysed on the basis of what and how they thought, this is not necessarily a problem, as long as the reader is aware of this reality.

Since most interviews were held on the telephone, there are no transcriptions of the interviews. Every interview has been carefully documented and every interviewee has given his/her permission to be included in this thesis. A list of the questions that were asked has been included in the appendix at the end of this thesis.

It is highly likely that the collections and collectors analysed in this thesis represent only a small percentage of the objects and collectors that exist(ed), because not every object becomes publicly available in a museum or on the art market. This means that this thesis does not provide a complete overview of collections and collectors of Iranian objects within this context, but only a glimpse into the facts surrounding the ones that ended up in museums.

Finally, this thesis was written during the Covid-19 pandemic. This resulted in limited or no access to museums and museum archives, limited or no possibility for interviews in person and limited or no access to literature and documents from libraries and national archives.

2. Theoretical framework

2.1 Postcolonial theory

Postcolonial studies is a field within the social sciences that emerged in the 1980s and 1990s. Postcolonial theory aims to decentre Western categories of knowledge, articulate the active histories of the margins, stop creating dichotomies, and study the relationship between power and knowledge in colonial images and languages (Webster 1996, 7). The theory can be used for archaeological science, since it offers a framework in which the relationships between the history of archaeology and colonialism can be understood (Moro Abadia 2006, 4). A postcolonial framework can provide a set of critical terms that can assist in unravelling the complexity of relationships between colonialism and science (Moro-Abadia 2006, 4).

One of the main criticisms of postcolonial studies on the traditional way of looking at the history of archaeology, relates to archaeology's long-lasting emphasis on the internalist interpretation (Schnapp 2002, 134). The focus of the internalist approach is on the scientific discoveries from 'the inside' only, without taking into account any political, social, cultural or economic context (Schnapp 2002, 134). Archaeology emerged in the late 19th century as a scientific discipline and was influenced by the empiricist philosophy of knowledge over time. Empiricism, in this sense, is constructed by a belief in autonomy and faith in the neutrality of the science of archaeology (Moro Abadia 2006, 7). Both the importance of autonomy and neutrality in empiricism relate to the status of scientific facts and their independence from their context. From this starting point, the science of archaeology has been dominated by internalist empiricism until at least around 1970.

Dennell (1990) explains the criticism on this traditional approach by stating that 'one gets the impression that world wars, for instance, interrupted research, but not the way that archaeologists thereafter viewed the past' (Dennell 1990, 549).

The history of archaeology, especially before the introduction of postcolonial theory, is often perceived as a colonial discourse that promotes the romantic idea of archaeology in colonised places. For the Near East, this romantic view on archaeology is explained by Said's definition of Orientalism (1978), namely that it is a worldview that constitutes the idea of European identity as a superior one compared to that of the 'other' non-European cultures (Said 1978, 15).

Orientalism is a style of thought that is based on the idea of the 'Orient' that was actually constructed by colonising European countries as a fantasised place of romance, exoticism and adventure and which was widely accepted (Said 1978, 10). As Said (1978) explains in his book with regard to the 'other', 'colonial categories not only constructed an image of the Other, but were also fundamental in shaping European

identity, science and politics'. Narratives that have promoted an idealised and romanticised image of archaeology were, indirectly, part of the justification of Western domination (Moro-Abadia 2006, 10).

Orientalism had a particular impact on the understanding and studying of Islamic philosophy as well. An important effect of Orientalism was a disinterest in Islamic archaeology by Western society which was often regarded as unimportant. Islamic art was described by Western scholars as 'unaccomplished' and 'inferior' for a long time (Hull 2013, 5614). A longstanding idea about Islamic civilisation that 'Islamic civilization as we know it would simply not have existed without the Greek heritage' (Rosenthal 1975, 14). In Orientalism, Islam had to be placed first within the realm of Western understanding, in relation to Western concepts, rather than regarding it on its own terms (Nooruddin 1998, 2).

Power can be subtle. It is not only described as the domination of a country through colonisation. Power cannot be completely characterized only by political control. Power is often maintained through hegemony or consent through ruling groups and the conviction of the belief that their interests are the common interests of the society at large (Moro-Abadia 2006, 7). Foucault and Said both emphasise the importance of 'consent' in the construction of power relations (Moro-Abadia 2006, 7). In this sense, postcolonial thought is characterised by a rejection of the creation of dichotomies. Postcolonialists rather view power relations as fluid, in that they can vary between locals and incomers (Gosden 2012, 256).

The connections between archaeology and politics, with the primary focus being on nationalism, have been acknowledged; however, the topic is still far from fully accepted in the academic archaeological community (Pollock 2008, 985). It is the opinion of many archaeological scientists that archaeology can no longer claim to exist in isolation from politics (Goldstein 2015, 885). The relationship between politics and archaeology can also be used in discussions on repatriation because this makes it possible to critically explore the historical context of an object in question.

Especially museums are and have always been closely intertwined with politics. At least historically, museums 'consciously or subconsciously supported the prestige or power of modern nation-states by publically presenting archaeological monuments' (Silberman 1997, 105). In recent years, decolonising museums has become an important topic for discussion. Decolonisation is sometimes even referred to as the predecessor of postcolonial theories whereby the first is considered to be more action-orientated.

As for Iran, it is important to state that this country has never officially been a colony. However, postcolonial studies will be used in this research since Iran has been affected by considerable powerful influences from colonising countries over the years that have impacted almost all economic, social, cultural and political aspects of Iranian life (Ghaderi 2018, 254). According to Professor Farah Ghaderi of the University of Urmia, research into postcolonialism can be empowering for the multicultural society of Iran because it can provide Iranians with a critical framework to question ongoing interventions and imperialistic legacies, and enable them to deal more effectively with present-day national and international issues (Ghaderi 2018, 455).

The history of archaeology in Iran cannot be understood without the use of a postcolonial framework that focuses on the broader context. Within this research, it is therefore important to be aware that there are always reasons why particular social classes promote particular archaeological agendas.

2.2 Looting

The theory regarding looted archaeological objects will be provided in this section, since it is fundamental to fully understanding the problems associated with looting when researching the provenance of objects. It is important to understand that the concept of 'looting' is not always black or white. As previously mentioned, looting is described as 'the illegal removal of culturally significant material from archaeological sites' (Bowman Proulx 2013). This definition will be used throughout this thesis although there are many definitions that slightly differ from each other. It is important to be aware that an object can both be illicitly excavated and illegally exported, licitly excavated and illegally exported or illicitly excavated and legally exported.

Problems regarding the illicit trade of antiquities have received more attention over the years. A general consensus exists among many scholars, including archaeologists and those within academia combining archaeology, criminology and/or sociology of the trade, that most antiquities circulating worldwide have no provenance or lack in transparency about their provenance (Brodie 2005; Renfrew 2000; Muscarella 2000). Provenance is the history of the ownership of an antiquity, which should ideally go back all the way to the original find spot (Mackenzie 2011, 44). The find spot of an artefact is often referred to as the provenience. Some archaeological scholars go as far as estimating that almost all antiquities without provenance were looted in the past (Cuno 2008; Muscarella 2013). However, the latter is a statement that is assessed from a present day perspective, which often, especially museum professionals, do not agree with when considering the limited legislation and enforcement of the past.

Antiquities without provenance lack archaeological value because they have no context, which many believe is the most important component of archaeology (Mackenzie and Yates 2016, 4). Looting is irreversible and thus highly damaging, since an object can very rarely be traced back to its original find spot once it is out of the ground. It is important to realise that antiquities that are derived from archaeological sites are often unknown beforehand, because they are in the ground, meaning that they would have no official record of existence (Mackenzie and Yates 2016, 5). This is almost always different from and more complicated than other objects that have been stolen, such as paintings for example.

Although looting exists in almost every country to some extent, most countries that struggle a lot with looting and that have a rich archaeological past are economically poor (Mackenzie and Yates 2016, 5). Included within this category are countries that are regarded as economically rich but still have a considerable wealth gap, leaving a large proportion of people living in poverty. Often, archaeological sites

are vital for these countries, since they depend on them for income from tourism. Besides economic destruction, looting can also impact community cohesion and society's certain perception of safety (Mackenzie and Yates 2016, 5).

Many people who retrieve antiquities from the ground are locals who have few other economic opportunities. Farokhi Eisvand (2018) describes their activities as 'subsistence digging' because it is undertaken by locals to find antiquities to sell them in order to use the proceedings as a means of living. He believes it is important to distinguish subsistence diggers from looters, since their primary aim is not to make a huge profit (Farokhi Eisvand 2018, 529). Locals most often receive only a small percentage of the final sale value of an antiquity, although they take a significant risk compared to the buyers in order to retrieve it.

Elia (2009) stresses that there is a clear causal relationship between collecting and the looting of archaeological sites. The antiquities market is in his opinion an economic system that is based on the elementary principles of supply and demand (Elia 2009, 240). Elia (2009) believes that the existing market drives the looting, which destroys important archaeological information on sites. There is a long-held collective belief that collectors are not responsible for archaeological destruction but that they are the complete opposite – saviours of antiquities (Elia 2009, 240). There is often a huge contrast between most collectors and archaeologists, namely that the object itself is of most importance to the one and almost least important to the latter.

Renfrew (2006) has made an argument that the attitude towards looted art is to a large extent set by museum curators. For some museums, it could be enough for the acquisition of an object to have been previously exhibited in a major museum or published, even if the object does not have a solid provenance (Renfrew 2006, 245). This form of so-called 'reputation laundering' is a problem in the antiquities trade, and is not the case only for museums but also for many auction houses. Antiquities have often travelled from one location to another supported by false provenance narratives or other neutralising engagements (Mackenzie and Yates 2016, 2). For example, a publication of a scholar or museum can neutralise an antiquity by increasing its reputation. To enhance the value of both genuine and fake antiquities, dealers allege they have been found at a specific site or local area, after which the site or location is often accepted by purchasers and scholars, and viewed as 'the archaeological reality' (Muscarella 2014, 35). Consequently, countless officially unexcavated antiquities are displayed in museums and have been published in scholarly articles and books on the basis of the claim that they derive from a specific area or site. It is however nowadays more unlikely for museums to acquire antiquities without a provenance them since there are stricter ethical guidelines.

A provenance can also be created over the years consisting in the form of a long chain of former owners instead of showing an actual find spot. Mackenzie and Yates (2016) describe the antiquities market as the 'grey market'. There are two types of greyness that appear in the antiquities market (Yates 2019, 74).

Firstly, it could refer to actions that lie in-between two opposites of behaviour; actions that cannot be classified as either legal or illegal and moral or immoral. Secondly, it could refer to a mixing of legal and illegal activities, whereby it becomes difficult to separate these actions from each other (Yates 2019, 74).

One of most important international efforts to protect cultural heritage was the formulation of the 1970 UNESCO Convention on the Illicit Import, Export and Transfer of Ownership of Cultural Property. The downside to this convention is that it is not binding on signatories. The 1970 Convention and other relevant legal instruments will be further discussed in chapter 3: International Heritage Law.

Finally, the digital market for antiquities has grown in the last couple of years, including looted and fake antiquities. EBay is increasingly being used as a market for antiquities (Fay 2011). With the rise of eBay as a digital platform, the market has broadened significantly. There is now an opportunity for selling lower value objects easily to a broader geographically distant and socio-economic public (Brodie 2015, 11).

2.3 Fakes

There is a considerable amount of research available on looting, yet comparatively little effort has been put into studying the phenomenon of fakes and forgeries (Sotiriou 2018, 224). Scholars pay relatively less attention to the problem of fakes than to the problem of looting presumably because the latter threatens cultural heritage more directly (Baroody 2012, 6-7).

The high demand for antiquities and the manufacture of forgeries are inextricably linked. The structure of the antiquities trade, in which the low supply of legal artefacts cannot meet the art market's high demand, incentivises not only looting but also the manufacturing of fakes (Nafziger and Tullio Scovazzi 2008, 153). To fully understand the antiquities trade, there cannot be ignorance of the immense number of fakes on the market and the often high expertise of connoisseurs of fake production (Muscarella 2014, 29).

History shows that forgeries have continuously been manufactured and purchased, irrespective of the culture, country or type of antiquity (Muscarella 2014, 31). William Coe (1993), archaeologist and active collector, describes the mechanism of fake production in a plunder chart (figure 1). As can be observed, fakes are often distributed throughout each step along the way, parallel to the distribution of real antiquities. The fakes are supplied to the first actors involved, the so-called runners, residents and couriers, but also above the 'frontier' in the Western art market, directly to the dealers and museum community (figure 1). This means they are dispersed widely and they have probably ended up everywhere – in auction houses, private collections, museums and more. The distribution of fakes might seem innocent, but research has shown that criminal activity of various kinds exists at all stages and levels of the antiquities trade (Yates 2018, 72).

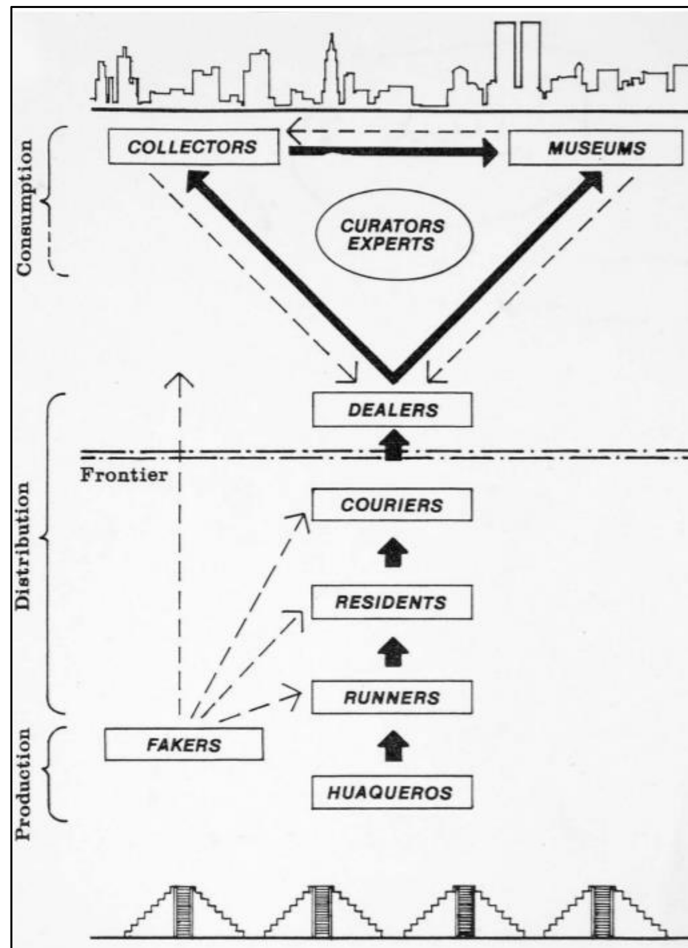


Figure 1: Plunder chart (Coe 1993)

The value of an antiquity is closely connected to its authenticity; if an antiquity turns out to be inauthentic its market value becomes worthless (Yates 2018, 75). This means that determination of authenticity is a priority within the market. In reality, there would be only two ways to know for a fact that an antiquity is authentic. Firstly, if it is derived from a legal archaeological excavation site, which has not happened for over a century, since archaeologically-excavated objects are rarely put up for sale anymore. Secondly, and ironically, if a buyer is able to show that he looted the object himself by showing a photograph *in situ*, for example (Yates 2018, 75).

Although scientific techniques are also used to determine authenticity, Yates (2018) mentions that each technique has its limitations and it is possible to be fooled by them. For instance, ancient pieces of ceramics are sometimes incorporated in the clay of modern forgeries which thermoluminescence (TL) dating, which can be used on ceramics, cannot detect. Radiocarbon dating is also limited since it can only be used on organic material (Yates 2015, 76).

The most common way is to establish authenticity on the basis of an 'expert opinion'. Often, publication in a scholarly article is considered to be enough proof that the objects are authentic (Yates 2018, 75). Although nowadays archaeologists consider it unethical to do so, this has happened often in the past and

these publications can and still are used to prove or enhance authenticity (Yates 2018, 75). This also means that, at least in theory, an archaeologist or museum professional possesses a lot of power and can have a huge impact on the antiquities market.

As for Iran, the continuous emergence of Iranian antiquities in worldwide markets resulted in massive museum and collector demands for antiquities, encouraging dealers to meet this demand by forging antiquities for them (Muscarella 2014, 37).

One of the most popular objects in Iran were the Luristan Bronzes (between ca. 3000 BC to 1000 BC), the commercial value of which was realised in the 1920s. The bronzes are from the province of Luristan and they are set apart from other bronzes because of the appearance of large numbers of cast ornaments (finials) and elaborate decoration usually involving characteristically grotesque animal motifs (Watson 2011, 1). The Luristan Bronzes became famous during the 1920s already, not only for their distinctive decoration, but also because of the huge number of fakes circulating worldwide. As happened with most popular objects, many forgeries of the Luristan Bronzes were created with the use of bronze casts.

3. Historical context of Iranian Archaeology

3.1 The Archaeology of Iran

Iran has a rich archaeological record, starting from the early Palaeolithic period and including the beginning of civilisation and the Islamic period (Tupan 2018, 6). Approximately 250,000 archaeological sites are presumed to be scattered across Iran and new sites are still being discovered all over the country today (Matheson 1999, 15).The Near East, and Iran in particular, played an important role in the beginning of agriculture and the domestication of animals and grains (Zeidi and Kharanaghi 2018, 29). A small introduction will be provided in this chapter to the archaeological periods, with a focus on the history of objects, according to the focus of this research. Most artefacts were derived from the many archaeological sites in the north-western region of Iran (figure 2).

Figure 2: Archaeological sites in Iran (Van den Boorn 1983, 13)

The first ceramics and settlements that have been found date back to the Neolithic period, that is, around 7000 BC. In those early agricultural communities, pottery was the only way of communicating and expressing local identity (van den Berghe 1966, 12). From early on, pottery was therefore elaborately decorated (Zeidi and Kharanaghi 2018, 37). The Zagros mountains and the province of Fars played an important role in the cultural development of pottery in this period (Zeidi and Kharanaghi 2018, 37). The decoration consisted of animal and plant figures, and geometric patterns. Copper began to be utilised during the chalcolithic period (5600 BC to 3400 BC). During the same period, the use of pottery also increased because of the introduction of ovens. Because there were two types of ovens, pottery was also characterised by two styles that can be distinguished from each other. In south-west Iran, it was usually light brown and decorated with dark brown paint. In the north, the pottery was often characterised by a red colour (Helwing and Nokandeh 2018, 42).However, the decoration of pottery seems to have ceased in most parts of Iran at the end of the 4th millennium, but seems to have reappeared in some areas from the second millennium BC.

Elam is considered to have been the first state in Iran, with Susa as its centre. This state lasted longer than any other in Iran, from ca. 3000 BC to 200 AC. During the beginning of the Proto-Elamite period, technological innovations occurred, such as copper-metal working and clay tablets, and cylinder seals were introduced for the first time (Abdi 2018, 51). While a large settlement appeared in Susa, the rest of Iran remained mainly agricultural, consisting of smaller settlements until around 1000 BC (Van den Berghe 1966, 9).

The protohistoric period (1200 BC-1000 BC) was characterised by the migration of Iranian tribes to the Iranian planes. Changes started to occur, including the introduction of a necropolis further away from the settlement, consisting of rich grave goods, mainly pottery and some metal objects. This pottery was characterised by grey-black or red ceramics, but never painted, and the use of animal shapes with an often thick and simple shape (Van den Berghe 1966, 40). The Amlash region during this period was characterised by very fine, thin, grey, black or red polished and undecorated pottery, which was often used as grave goods. Besides pottery, bronze weapons and golden jewellery have been found at Amlash (Van den Berghe 1966, 45). In about 1000 BC–700 BC, bronzes were produced on a large scale. These are known as the Luristan Bronzes (Van den Boorn 1983, 47).

The Achaemenid Empire (550 BC–330 BC) was the largest empire that the world has seen thus far. Persepolis was built during this period. The large amount of gold and silver jewellery and objects from that period indicate the enormous wealth of the empire (van den Boorn 1983, 98), which was followed by the Seleucid (330 BC – 250 BC), Parthian (250 BC – 224 AD) and Sasanian (224 AD – 642 AD) empires.

A turning point in the history of Iran was the Muslim conquest of Persia (633 AD–654 AD), which ended the Sasanian period and introduced the Islamic period. During the first dynasty of the Oemaijaden (661 AD–750 AD), the pottery was characterised by a large unglazed part and was painted in a 'cold' way with

red and black line decorations. During the Abbasid period (750 AD–1258 AD) the pottery styles were extremely diverse. Apart from undecorated stained glass, pottery was also made with the use of majolica (tin glaze) with a sgrafitto decoration.

3.2 History of Iran in relation to archaeology

3.2.1 History of Iran

Historically, Iran has always remained independent, in that it has never been officially colonised. The country has, however, been used as an important strategic base for various existing colonial powers. Russia and England, in particular, were competing with each other over power in Iran long before the 20th century. This ongoing rivalry actually resulted in Iran never being colonised by either one of these nations (Axworthy 2009, 230). This also meant that the ruling Shah, mostly in the 19th century, was often caught between the interests of Russia and England, who both had an aversion to change or reform. The Shah was, in some respects, independent in name only, resulting in an illusion of Iranian independence for decades (Axworthy 2009, 229). The historic evidence indicates that, on the one hand, the Iranian ruling class was often not particularly concerned with the fate of the country and, on the other, the countries seeking their own interests in Iran were busy imposing their will (Hodjat 1995, 159). As Western countries were moving towards the industrial revolution and political and economic supremacy in the 19th century, Iran suffered a social and economic depression for most of the time under the Qajar dynasty, which lasted from 1789 to 1925 (Abdi 2001, 53).

The Qajar dynasty has been characterised as a century of misrule (Garthwaite 2008, 110). Some major changes occurred in Iran during the second half of Qajar rule, the most important is regarded as the introduction of nationalism (Abdi 2001, 53). For decades, Naser al-Din Shah, a Qajar dynasty ruler from 1848 to 1896, distributed Iranian resources to foreign countries in order to obtain easy revenues that were devoid of any economic incentives in favour of Iran (Abdi 2001, 55). This eventually led to a revolution in 1906. An example under Naser ad-Din Shahs's reign, is when the Iranian government sold the licence to prospect oil in the whole country for a period of sixty years to Englishman William Knox D'Arcy for the extremely low price of 20,000 pounds in 1901 (Aqeli 1991, 18). The effects of this were profound for the future of Iran. It happened in a time when England's focus with respect to Iran changed from merely protecting the Indian northwest border to obtaining oil reserves, which eventually became a key interest for the British Empire.

After the revolution in 1906, British and Russian powers put even more pressure on Iran following the introduction of the Anglo-Russian agreement in that same year, which divided the country into those countries' spheres of influence (Abdi 2001, 56). This agreement is regarded as a turning point for nationalism (Abdi 2001, 56).

Reza Khan (hereafter 'Reza Shah') reigned from 1925 to 1941 and established a republic. He introduced the Pahlavi Dynasty, which lasted until the Iranian Revolution in 1979. Reza Shah was a fierce nationalist, and his goal was to become independent of foreign powers and to modernise the country in order to become equal to Western countries (Axworthy 2009, 264). Part of these developments were secularisation and Westernisation, leading to the replacement of Islamic laws with Western ones (Axworthy 2009, 264).

In 1941, Reza Shah's son Mohammad Reza Pahlavi ascended the throne and remained Shah until the Iranian Revolution. Mohammed Reza had a Western education and had the same focus on modernisation and Westernisation as his father. He was extremely popular at first, because he nationalised Iran's oil industry. Over time, the Shah became more autocratic. During his reign, Iran was extremely open and had close relations with the Unites States and other foreign countries (Matthee 2002, 366). Huge military subsidies were provided to Iran by the United States and Iran became an important American ally in the Cold War (Watson 2015, 24). Iran became increasingly dependent on the United States and a constant theme throughout Mohammad Shah's reign was the promotion of modernisation in order to bolster legitimacy in the eyes of Western countries (Watson 2015, 24).

Mohammed Shah introduced the White Revolution in 1963–1973, which resulted in rapid industrial modernisation, which in turn only increased the wealth gap in Iran (Watson 2015, 24). With the assistance of the United States, Mohammed Shah's regime also introduced the National Organization for Security and Intelligence (SAVAK), a security apparatus that coerced people who opposed his regime. It was known for utilising severe techniques, including torture (Watson 2015, 25). In 1971, the Shah organised a celebration of the 2,500th year anniversary of the Persian Empire. The event was enormously excessive, costing an estimated 22 million dollars. Many royals and presidents from all over the world were invited and the event was seen as a form of propaganda characterised by the incorporation of an orientalist image of Iran (Watson 2015, 25). The regime of Mohammed Shah had relied upon the West's fascination with the 'other'.

The revolution of 1979 was partly a conservative backlash against the Westernisation. The criticism increased even more in the years leading up to the uprising, particularly when a period of economic uncertainty occurred because of high inflation (Axworthy 2009, 303). Many countries ceased their operations in Iran and foreigners left Iran in the years leading up to the 1979 Iranian Revolution.

3.2.2 History of archaeology in Iran

An important aspect of the changes that occurred during the second half of the Qajar dynasty was the introduction of archaeology in Iran (Abdi 2001, 53). As foreign countries increasingly sought power over Iran, foreign interest in controlling archaeological sites simultaneously increased. However, it took a long time before Iranians developed a serious appreciation of the country's archaeological sites, which resulted in failed attempts to properly protect archaeology from early on (Abdi 2001, 54). There was not necessarily a lack of interest in culture itself, but archaeology had never been offered as an academic course in Iran (Hillenbrand 2016, 15). Archaeology, as a Western discipline, simply did not yet exist in Iran.

The first phase of foreign involvement in Iranian archaeology was from ca. 1884 to 1930, and was characterised by French monopoly (Young 1986, 1). This phase was introduced by one of the most well-known archaeological excavations during this time; the French excavation of Susa (1884-1886). Thereafter, the French obtained an official monopoly of archaeological excavations in Iran in 1900. It was granted by Naser ad-Din, who reigned under the Qajar dynasty. No scientific purpose or national incentive was considered by the Qajar court when signing the agreement, which demonstrated the readiness of the Iranian ruling class to offer anything for an amount of money (Hodjat 142). According to the concessions that were made, all antiquities that were discovered had to be exported to France (Abdi 2001, 54). This led to the first protests by nationalists against the looting of the cultural heritage of Iran (Abdi 2001, 54). While the colonising powers tried to control Iran even more, nationalist feelings swelled in Iran, which in turn triggered a desire to eliminate the French monopoly of archaeological excavations (Young 1986,3).

Phase two started in 1930, when archaeology became an increasingly multinational affair. In 1930, the Antiquities Law was ratified, sparked by nationalist movements and an awareness of the French archaeologist's crude ways of excavating at Susa but also by other foreign countries' interests. This was the first law that was enacted to protect the archaeological heritage of Iran (Negahban 1996, 5).

The law was approved by the Iranian government but written by a foreigner, Ernst Herzfeld (1879–1948), who was an archaeologist from Germany and an important archaeologist in Iran (Mousavi 2005, 461). Herzfeld knew that no excavations at Persepolis could be carried out without concrete regulation (Mousavi 2005, 459). In a detailed account from 1929, Herzfeld explains the difficulties of negotiating the new law with the Iranian government. Upon reading the first draft, court minister Teymourtash (1881-1933) responded that it was unacceptable.

Teymourtash thought that 'connecting the excavations with a division of finds was a devaluation of a very idealistic enterprise' (Letter from Ernst Herzfeld on 1 November 1929). Herzfeld mentions that he told him that 'he should know the economic situation of the world well enough not to believe that such a great amount of money could be spent without expecting any kind of compensation'. He states the importance

of the need for foreign donations for excavations in Iran. He also states that he reminded Teymourtash of 'the fact that there would be no interest in Persian art if foreign museums did not possess Persian art objects' (Letter from Ernst Herzfeld on 1 November 1929). Herzfeld firmly told Teymourtash there was no other means of raising the necessary money and he threatened to leave Iran if 'the attitude of the government that gave the impression that there were more favourable conditions for archaeological research has apparently changed'. After long discussions, the 1930 law was eventually approved by the Iranian government. The institutionalisation and legislation of Iranian archaeology was born from the circumstances mentioned above and has had a profound impact on the development of archaeology for decades (Mousavi 2005, 470).

The law stipulated, among other things, that the French monopoly was cancelled and that the French were restricted to Susa, where they were allowed only in the presence of an Iranian governmental official. It was also stipulated that the Iranian government should build an archaeological museum and a library in Teheran (Negahban 1996, 6). During the same period, the Archaeological Service of Iran was formed. In light of the French concessions, the government decided that the French André Godard (1881-1965) was to be appointed as the director of the Archaeological Antiquities Service from 1928 to 1960. He was seen as a key figure in the protection and promotion of the cultural heritage of Iran. However, his reputation diminished in the 1960s, when he was accused of involvement in antiquities dealing while holding the position of director of such an important archaeological institute (Mousavi 2005, 471).

With the abolition of the French monopoly of archaeology, other countries now saw the opportunity to join the excavations. There were now also more options available that were stipulated in the 1930 Antiquities Law.

Apart from official scientific excavations, at which a certain level of quality was maintained, it was now also possible to obtain a permit for commercial excavations, as stated in the 1930 antiquities patrimony law. Commercial excavations were often pursued by local volunteers acting with foreign participation (Hedjat 1995, 184). The trading in archaeological objects from Iran consequently became a lucrative business. Commercial excavations made it possible for half of all finds to be kept by the person who was paying for the excavation in order to sell the objects on the open market (Negahban 1996, 5). The other half would be kept by the government after inspecting all objects. Professor Ezat O. Negahban (1926–2009) was one of the Iranian archaeologists in charge of the archaeological excavations at Marlik, Haft Tepe and Sakkizabad during the explosive phase of excavations. One of the reasons for which this phase was explosive was because archaeologists such as Negahban felt it was a race against the clock before the sites were destroyed by looting.

In his excavation report on the Marlik site (1996), Negahban recorded the reasons for which archaeology had been neglected in Iran. One was that the number of trained archaeologists was still very limited in the country, which resulted in most positions in the Archaeological Service being occupied by non-specialists

(Negahban 1996, 2). The Ministry of Education decided that local schoolmasters would represent the service, with the power to certify licences. The schoolmasters did not even attend the commercial excavations most of the time because they were busy with their jobs; thus they would supply the required certifications on the basis of the unsupported statements of the excavators (Negahban 1996, 2).

Negahban stated that 96% of these excavations had certificates on which it was stated, unrealistically, that no antiquities had been found during the excavations (Negahban 1996, 6). He suggests that many antiquities were secretly transported out of the country under this ruse because of the lack of monitoring of commercial excavations.

In 1960, the director of the service in the Fars Province, Mr Fereidoun Tavolloli (1917–1985), wrote articles exposing the situation of corruption and the consequent plundering of the national heritage. As a result, the Royal High Inspecting Office became concerned and slowly began to take serious steps to clean up the service (Negahban 1996, 7).

In the meantime, there was still little advancement in legislation or enforcement of the protection of archaeology. The patrimony law of 1930 had remained unchanged for decades and had not been actively and effectively enforced (Rouhani 2011, 1). This has led to decades of a great deal of illegal digging and the illicit trafficking of antiquities out of Iran (Negahban 1996). Negahban (1996), who witnessed the practices first hand, refers to the commercial excavations as 'illegal digging'.

Besides commercial excavations there was also an increase in scientific excavations now that Iran was more open to foreign countries. The 1960s and 1970s witnessed such a major growth in archaeological activities that archaeological scholar T.C. Young describes it as ''the Explosive Phase'' in Iranian archaeology (Young 1986, 281). Many expeditions from European countries, the United States, Canada and Japan embarked on fieldwork in Iran. Young (1986) researched archaeological fieldwork and showed that, in the explosive phase between 1958 and 1978, 56 sites were excavated by official archaeologists, of which 12,5% were led by Iranian archaeologists.

The Archaeological Service of Iran, now an established organisation, contributed considerably to archaeological fieldwork in Iran. Furthermore, the Department of Archaeology of Tehran University, under Negahban, began to play a profound role in archaeological research the country, both by undertaking its own projects and training archaeologists to serve in the Archaeological Service of Iran (Young 1986, 283).

Eventually, in 1972, Dr Firouz Bagherzadeh (1930–2021), who founded the Centre for Iranian Archaeology in the same year, took the initiative to oppose the clause about the division of archaeological finds within the 1930 law and it was rescinded (Mousavi 2005, 471).

Many foreigners left Iran in the years leading up to the Iranian Revolution in 1979 (Axworthy 2009, 303). The measures that were taken on the heritage front consisted of three sanctions that abolished commercial excavations and the import and export of antiquities (Hodjat 1995, 217). In the years after

the revolution, a dramatic decrease in archaeological excavations occurred, partly because there was initially an aversion in Iran towards international accessibility to archaeological sites and antiquities, since this practice represented the former monarchy (Mousavi and Nasiri-Moghaddam 2009, 8).

3.3 International and Iranian Laws on the Protection of Cultural heritage

3.3.1 International cultural heritage legislation

On an international level, there are two main treaties that provide a framework for approaches to regulation of the antiquities market: the 1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property and the 1995 UNIDROIT Convention on Stolen or Illegally Exported Cultural Objects. Of the two treaties, the UNIDROIT Convention provides more rigorous guidelines in relation to buyers' obligations and the rules for return of looted objects to the rightful owners (Mackenzie 2019, 45). This was, however, also one of the reasons for which few countries have decided to take on the obligations of the UNIDROIT Convention and none of the ones who did were major market countries (Mackenzie 2019, 45).

The Netherlands ratified the 1970 convention relatively late, in 2009. The law was eventually implemented in the *Erfgoedwe*t (the national heritage law). Iran had ratified the convention already back in 1975. The UNIDROIT convention has not been ratified by the Netherlands but Iran ratified it in 2005.

The 1970 UNESCO Convention lays down obligations both for state parties for the protection of their cultural property and the mechanisms for the restitution of illicitly removed objects (UNESCO Convention 1970). It provides a common framework for the states parties on the measures to be taken to prohibit and prevent the import, export and transfer of cultural property.

A brief summary of the most important articles will be provided below. It is important to remember that the articles are not binding; they have to be implemented by each country at its discretion. First of all, **article 1** of the Convention defines 'cultural property' in order to specify to which items the convention applies. There is a detailed list of categories available that help to specify this definition, but each state has to independently define what cultural property means to them. **Article 3** states that the import, export and transfer of cultural property is illicit. **Article 7** states that state parties need to take necessary measures, consistent with national legislation, to prevent museums and similar institutions within their territories from acquiring cultural property originating in another state which has been illegally exported after entry into force of the convention. Whenever possible, to inform a state of origin that is party to this convention of an offer of such cultural property illegally removed from that state after the entry into force of this convention by both states (UNESCO Convention 1970, Article 7a). In **Article 7c** it is stated that, at the request of the state of origin, appropriate steps should be taken to recover and return any such cultural property imported after the entry into force of the convention in both states concerned,

provided, however, that the requesting state shall pay just compensation to an innocent purchaser or to a person who has valid title to that property (UNESCO Convention 1970, 7c).

Criticism of the convention

The downside of the 1970 convention is that it is not binding. Because it has to be ratified by a country and can be implemented in differing ways, it is often seen as a diplomatic rather than a legal instrument (Brodie 2000, 37). Countries decide themselves how and when to ratify it and many, mostly market, countries have only done this decades later. The convention is also of little interest to source countries, since many of the major objects of cultural significance are already located in other countries (Prott 2009, 12).

Another downside of the convention is that it is non-retroactive (Françozo and Strecker 2017, 463). This means it could also be used as a benchmark to legitimise objects without provenance before the date on which the convention came into force. However, this does not mean that dealing in unprovenanced objects before the 1970 benchmark is instantly ethically justified.

Legally, a problem with the UNESCO 1970 convention in battling the illicit trade in cultural objects is that it often involves violation of the rights of non-states entities, such as individuals, groups and institutions (Vrdoljak 2012, 120). The legal process of returning looted items can be complex, since many objects are legally associated with more than one country; thus several jurisdictions become involved (Blake 2015, 15). International agreements are treaties between two countries, whereby a country promises to take action, which means such an agreement depends, for its enforcement, primarily on goodwill or on external pressure from other governments and/or public opinion (Papa-Sokal 2020, 1). Unless the countries in question are signatories of the convention and only if they are willing to represent the interests in question at a diplomatic level, this treaty is regarded as ineffective (Vrdoljak 2012, 120).

3.3.2 Iranian cultural heritage legislation

For decades, the 1930 National Monument Preservation Act was the first and only law to protect national heritage. In 1968, the Repeated Article 127 of the General Penal Code was the only criminal law that concerned the protection of cultural heritage and was in force until 1978 (Samadi 2003, 182). After the Iranian Revolution, commercial excavations were not permitted after a legal bill was passed in 1980 on 'Preventing clandestine diggings and illegal excavations intended to obtain antiquities and historical relics (…)' (UNESCO 1980). The National Monument Preservation Act and the Penal Code will be summarised in the following section, with a focus on the articles that are relevant to the timeframe of the Dutch collectors in Iran.

The *National Heritage Protection Act 1930* was passed on November 3rd in 1930. Article 11 refers to permission for commercial excavations and article 51 refers to restrictions on the export of antiquities.

Article 2 provides for an inventory to be built up of all known and distinguished items of national heritage and **article 3** recognises that provision can be made for moveable properties. The focus here is on articles regarding moveable properties, since antiquities are moveable. **Article 9** obliges the owner of a moveable property to inform the pertinent government of an object if it is registered on the National Heritage List before selling any such property to another person. The National Heritage list is, of course, limited and falls far short of including all antiquities. **Article 10** states that 'anyone who accidentally or by chance finds a moveable property which, according to this Law, may be considered an item of national heritage, though it has been discovered on his/her own property, shall be obliged to inform the Ministry of Education (…) as soon as possible; in case the pertinent State authorities recognise the property worthy to be registered on the List for National Heritage, half of the property or an equitable price, as considered by qualified experts, shall be transferred to the finder, and the State shall have the authority, at its discretion, to appropriate or transfer the other half to the finder without recompense'.

The focus of **articles 14** to **23** is on excavations. **Article 14** states that half of all finds shall be appropriated by the state 'during scientific and commercial excavations (…) If the State discovers the objects directly, it may appropriate them all, and if the discovery is performed by others, the State may choose and possess up to 10 items out of the objects of historical artistic value; half of the rest of the objects shall be transferred freely to the discoverer, and the other half shall be appropriated by the State. In case all the discovered objects do not exceed 10 items and the state appropriates them all, the expenses of the excavation shall be refunded to the discoverer'. **Article 17:** 'Those who intend to deal in antiquities as an occupation should obtain permission from the State'. **Article 21** provides a clear definition of the difference between commercial and scientific excavations: 'Excavations are termed "scientific" when their purpose is to discover material pertaining to the study of the ancient civilisations of Persia and of their relations with other civilisations. They are termed 'commercial' when their purpose is to discover antiquities for commercial transactions'. **Article 23** states that requests should be made for licences: 'Requests for licences to excavate should be addressed to the Minister of Education. They must contain the under-mentioned details (…)'. Finally, **Article 51** clearly mentions that the state can confiscate objects that are exported without proper permission: 'The Antiquities intended to be taken out of the country without obtaining proper permission shall be confiscated'

On August 1 1968, a penal law was approved for article 127 that was aimed to increase penalties for violations of the 1930 National Heritage Act. The penalties varied from between three months to 10 years

imprisonment. The most relevant articles are mentioned below. They were translated from the French document by the author of this thesis:

Article 1 deals with damaging objects with the goal of selling them for profit: ‘Anyone who damages objects that are registered as historical monuments, with the goal of removing the object and selling it for profit, can receive a penalty of two to 10 years in prison under the National Heritage Act’. **Article 2** deals with hiding, buying and keeping objects**: ‘**Anyone who has kept, bought or hid objects that are part of historical monuments from museums, exhibitions, historical sites or property of the government, whilst aware that the object has not been obtained legally, can receive a penalty of two to five years in prison’.

Articles 3 and **5** deal with looting. **Article 3** states: ‘Anyone who, without the permission of the ministry of Culture and Arts, is near sites of national or historical monuments and is caught digging any objects out of the ground can receive a penalty of one to three years in prison’. **Article 5:** ‘Anyone who digs antiquities out of the ground without a permission from the government, even on his/her own ground, can receive a penalty of six months to three years in prison’.

Lastly, **articles 4**, **7** and **8** deal with the export and trade of antiquities. **Article 4:** ‘Anyone who exports antiquities without following the law can receive a penalty of one to three years in prison. Attempts to export antiquities are also treated as a criminal offense’. **Article 7:** ‘Anyone who wants to trade in antiquities on the commercial market must have a licence from the government that is restricted by certain rules and terms (…)’. **Article 8:** ‘Anyone who sells an antiquity outside of the law can receive a penalty of three months to a year in prison.’

Criticism of national laws

Preventative laws in Iran have generally remained vague, absolute and restricted compared to corresponding laws in other countries (Tabasi and Ansari 2004, 260). The enforcement of the laws often seems to be too selective and does not cover all the problems that Iran struggles with in terms of preventing looting. Sayyed Hasan Taqizādeh, an influential Iranian politician, noted that policymakers in Iran during this period in the beginning of the 20th century considered policies similar to Europe as a way of saving the country from underdevelopment (Hodjat 1995, 175). The problem with this type of policymaking was that it appeared to favour national interests that were borrowed from European countries, which meant the authorities often failed to overcome problems and were in conflict with Iranian social mores (Hodjat 1995, 175). Most importantly, there was no justification or relationship between these new ‘Western’ laws and the beliefs and values in Islamic society (Hodjat 1995, 118).

In Islamic societies, the majority of people generally have a deeper faith in religious laws than in civil laws. It would therefore have been more effective if the new laws had been in line with the religious laws. Cultural heritage policies were definitely no exception to this new type of law-making.

Apart from the problems with the legislation itself, in 1930 there was also not much money and no proper resources were available to control the commercial excavations that were carried out. Archaeology was introduced as a discipline relatively quickly in Iran, which meant that there was often ignorance about the value of cultural heritage and resources were not always already in place. Besides that, Iran went through multiple economic depressions over the years, meaning there was not always enough money available for the enforcement of the 1930 law. The prevention of looting, often in remote areas such as is the case in Iran, as well as the prevention of illegal exports, can be an extremely expensive enterprise.

3.4 The return of the Yolande Maleki collection

In 2015, a collection from Khurvin (also spelled as Khourvin or Khorvin), formerly owned by Belgian private collector Yolande Maleki, was returned to the National Museum of Iran. The case is discussed below as an example of the practical side of the laws discussed above, and especially because the way of acquiring, the date of export and the origin of the objects are all similar to the Iranian collections in the Netherlands. This is the only known case of returned artefacts that resemble the Dutch Iranian collections that were acquired and exported in the second half of the 20th century.

Figure 3: A part of the returned Maleki collection on display at the National Museum of Iran (http://www.payvand.com/news/15/jan/1101.html)

A summary is provided based on the verdict of the Belgian the Supreme Court and both Iranian and Belgian reports on the case by reporters Babak Ershadi for the *Revue de Teheran*, Guido van Damme for *Le Soir* and Ehsan Naderipour for the Islamic Republic News Agency.

In 1948, Yolande Wolfarius-Maleki from Belgium married an Iranian doctor, who was the personal physician of the Shah, and moved to Iran. Wolfcarius-Maleki developed an interest in the archaeological history of Iran and collected antiquities at the markets to start her own collection. She also hired the Belgian archaeologist Louis van den Berghe for commercial excavations at Khurvin and became adjunct director of the Belgian Archaeological Mission in Luristan. In total, 349 objects were derived from Khurvin. In 1965, the Malekis moved back to Belgium and wanted to bring their archaeological collection with them. They packed all the objects into 10 crates and, because they knew that it was 'possibly' not legal, according to Iranian law, to export the objects without a licence, they obtained assistance from a Belgian diplomat, Albert Mariën (Ershadi 2015, *Revue de Teheran*). Mariën, who enjoyed diplomatic immunity, was able to send the crates to France. The crates were later sent from France to Yolande Maleki in Brussels, where they were kept at the *Jubelparkmuseum* (nowadays: KMKG) and remained stored there until the return of the collection to Iran. Wolfcarius-Maleki later stated that she could not find the documents, but the Iranian government was determined. It stated that the export was illegal and performed under diplomatic guise (Ershadi 2015, *Revue de Teheran*).

The situation was first brought to light in 1981, when the Iranian government heard of an illegally exported collection that was on display at a museum in Gent. In 1982 the Iranian government filed a lawsuit against Wolfcarius-Maleki for the return of the objects to Iran. The Brussels Court of First Instance denied this claim. In 1991, Iran lodged an appeal, in which it introduced (in addition to the demand for the return of the items) a claim of ownership of the collection (Blake 2015, 62-63). The Brussels Appeal Court ruled in 2011 that the re-exportation of the archaeological objects was prevented by Belgian international private law and that the ownership lay with Maleki (*Cour d'Appel de Bruxelles*, 4eme Chambre – R.G. no. 2002/AR/1993/ of 20 April 2011).

In 2012 the Iranian Cultural Department sought judicial review of this ruling before the Belgian Supreme Court. The Supreme Court overturned the ruling of the Court of Appeal and referred the case to the Court of Appeal of Liege (Cour de Cassation, 04 October 2012, no. C.11.0686.F - https://juricaf.org/), which then, in 2014, resolved this case on a definitive basis. Wolfcarius-Maleki's ownership was denied and the collection was ordered to be returned to Iran (Cour d'Appel de Liège, 14 October 2014, unpublished).

In 2015, the collection was indeed re-exported and taken to the National Museum of Iran, where an exhibition was held to showcase the collection from Khurvin.

In this case, the objects were returned on the basis of the 1930 National Heritage Protection Act of Iran. In particular, Article 51 ('The Antiquities intended to be taken out of the country without obtaining proper permission shall be confiscated'), states clearly that a permission is required to export objects from Iran.

In the end, the fact that Wolfcarius-Maleki could not prove that she was in possession of an export licence and the fact that a diplomat assisted her to avoid the law indicated that the objects should be returned to Iran.

Iranian president Rouhani said that the return of the collection showed the 'safeguarding of the right of the Iranian nation' and the vice-president and head of Iran's Cultural Heritage said that 'returning these objects is a big political and legal victory for Iran' (Naderipour 2015, 3). The return of objects is a way to render justice and is also often a politically-charged affair one way or another.

Figure 4: Iran's President Hassan Rouhani on a visit to the exhibition of the Khurvin collection in the National Museum of Iran on 17-01-2015 (http://www.payvand.com/news/15/jan/1101.html)

The reason for which Iran sought the return of the objects was at least partly related to the political situation in that country. Reporter Guido van Damme (1988) wrote a report on the lawsuit in *Le Soir*. The date of the claim is from 1982, three years after the Iranian Revolution took place. The Ayatollah's regime was probably against the Malekis since Yolande's husband had been the personal physician of the Shah and they undoubtedly had good relations with the former regime.

During the revolution, the Maleki's house in Teheran was raided and the Ayatollah confiscated everything inside their house. In correspondence with the Shah they discovered that questions were being asked about the collection, since the diplomat who had helped them to transport the items, Mariën, appeared to be involved in fraud scandals. Wolfcarius-Maleki stated during the process that 'they should pay her if they want the collection back since they plundered her whole house in Teheran'.

The regime of the Shah before the revolution was Western-centred and approved the idea of exhibiting Iranian antiquities in other countries. In contrast to the Shah's regime, the Ayatollah did not encourage open relations with foreign countries, including the export of objects of archaeological significance.

This is the only known case of returned artefacts that resemble the Dutch Iranian collections that were acquired and exported in the second half of the 20th century. However Naderipour (2015) mentions that Iranian officials have filed several other lawsuits in courts in Britain, France, Turkey, and Pakistan for the return of objects taken from Iran over the past years. Some examples of lawsuits are Barakat galleries vs Iran in the United Kingdom, a bas-relief from Persepolis in New York and general claims relating to the Western Cave treasure. It is unknown exactly how many lawsuits have been filed.

4. Iranian Antiquities in Dutch museums

4.1 Dutch engagement in Iran

In this chapter, Dutch engagement in collecting Iranian antiquities is described. As explained in the historical archaeological context of Iran, there were many foreign influences in Iran. The Netherlands played a relatively important role in Iran, along with France, Germany, Russia, England and the United States.

The Netherlands were already present in Persia from the 17th century since the Vereenigde Oostindische Compagnie (V.O.C.) was the most important trading firm in Persia (Floor 2012, 610). The Netherlands had signed a treaty with Iran in 1857, which became defunct after the Persian capitulations in 1927. A new treaty between the two countries was signed in 1930, ensuring that the Netherlands would remain officially represented in Iran (Floor 2012, 611).

The Netherlands was represented in Iran mainly because of the oil industry. Royal Dutch Shell was one of the 'Seven Sisters', the seven transnational oil companies of the Consortium for Iran (Sampson 1975, 10). These seven companies dominated the global oil industry from the mid-1940s to the mid-1970s. The Dutch Embassy had considerable influence, since Royal Dutch Shell was accorded the role of coordinator within the oil consortium between 1953 and 1973 (Floor 2012, 612). This, in turn, meant that there were jobs available in Iran for Dutch people in the oil industry.

There were also jobs available that were related to the oil industry. The exploration and production of oil demanded a great deal of dredging work; thus, dredging companies had projects in Iran. The Delta Project being set up as a response to the flood disaster in Zeeland in 1953 was an enormous boost for these companies (Sluyterman 2011, 7). The Dutch dredging companies also benefitted from the fact that Shell was a Dutch company. Boskalis is an example of a Dutch dredging company that worked in Iran for oil-related projects linked to Shell (Sluyterman 2011, 8). Petit confirms in an article on Dutch collectors in Iran that, from the 1950s, many Dutch companies were active in Iran and that some of their employees started collecting antiquities (Petit 2018, 429).

As with other foreign countries, most Dutch companies and their employees left Iran in the years leading up to the Iranian Revolution in 1979. Kees Kremer, one of the collectors, described the situation in 1977 as follows: 'Teheran has not been the same as it used to be all these years; it has changed very much and definitely has not improved' (RMO-archief: nr. B 1986/1.1-79).

Many of the Iranian objects collected in this context ended up in museums in the Netherlands. There are three Dutch museums that have Iranian antiquities in their collection: the RMO in Leiden has about 3,700 objects, the AP in Amsterdam has 95 objects and the Princessehof in Leeuwarden has 335 objects. As mentioned previously, the collections are considered to be among the most important Iranian collections in Europe (Petit 2018).

It is important to realise that the above-mentioned objects are only the ones we know about because they ended up in museums and became available to the public. Since we know from the Iranian archaeological context that it was quite easy to obtain antiquities and that many Dutch people resided in Iran, it is highly likely that there are many more Iranian artefacts in the Netherlands that have remained under the radar, such as those that have been kept as private collections, have been gifted to friends or family, or have ended up for sale through auction houses or art dealers.

4.2 Rijksmuseum van Oudheden

The RMO in Leiden is the National Museum of Antiquities of the Netherlands. It was founded in 1818 to host the collections of artefacts that were acquired by the University of Leiden.

Although the RMO had been determined, from its foundation, to collect objects from Iran, the first objects from Iran arrived only 60 years later (van den Boorn 1983, 21). The first of these arrived at the museum in 1876 and 1877 as gifts from Richard Charles Keun (1838 – 1906), the Dutch consul of Iran, who had acquired the objects himself (van den Boorn 1983, 21; Petit 2018, 419). The next addition was a donation of 10 objects by Gratema in 1906. By 1930, about 40 years later, the collection still consisted of only 20 objects.

This changed when the museum received a budget for acquisition from the *Reuvens Fonds,* a funding from friends of the museum. From then on, between 1930 and 1960, objects were regularly acquired, mainly from art dealers. Until 1964, the number of Iranian acquisitions remained limited to an average of zero to four objects per year. This coincided with the worldwide attention on the Luristan bronzes and other objects from Iran. For example, the registration books of the museum shows that, in the 1960s, two larger collections that included Luristan Bronzes were bought from art dealers Möger and Motamed.

What is unique about RMO's Iranian collection is that most of the objects, that is, 81%, were acquired from private collectors and relatively late, in the 1980s, or, more specifically from 1982 to 1988 (figure 5). None of them were derived from scientific excavations (Van den Boorn 1983, 9). In the 1980s, museums were generally buying and acquiring fewer objects from all over the world than previously (Garrison 2012, 27-28). The RMO does not follow this practice as concerning the Iranian collection. The catalogue also shows that 95% of the total Iranian collection was from private collectors and only 5% from art dealers.

The last Iranian objects were acquired in 2019. According to the catalogue, in 2020 the Iranian collection of the museum consisted of about 3,750 objects.

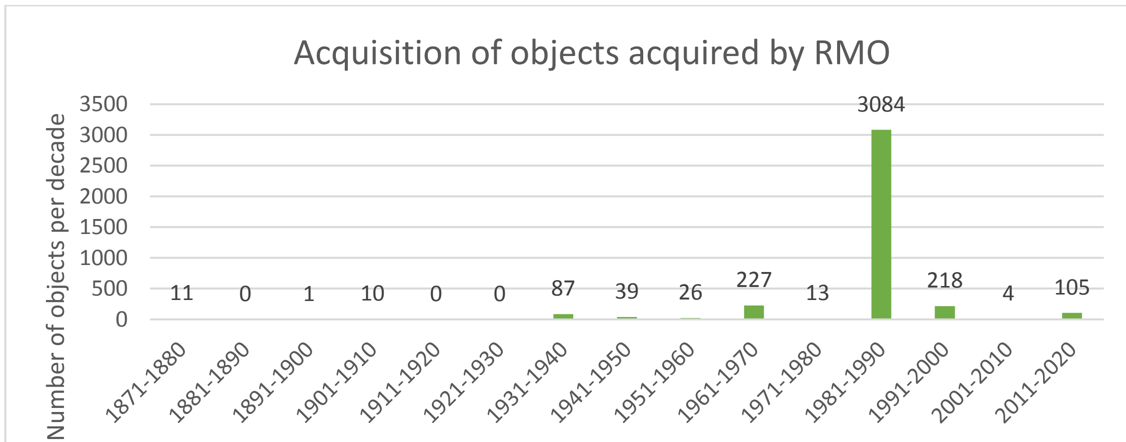


Figure 5: Acquisition of objects by RMO

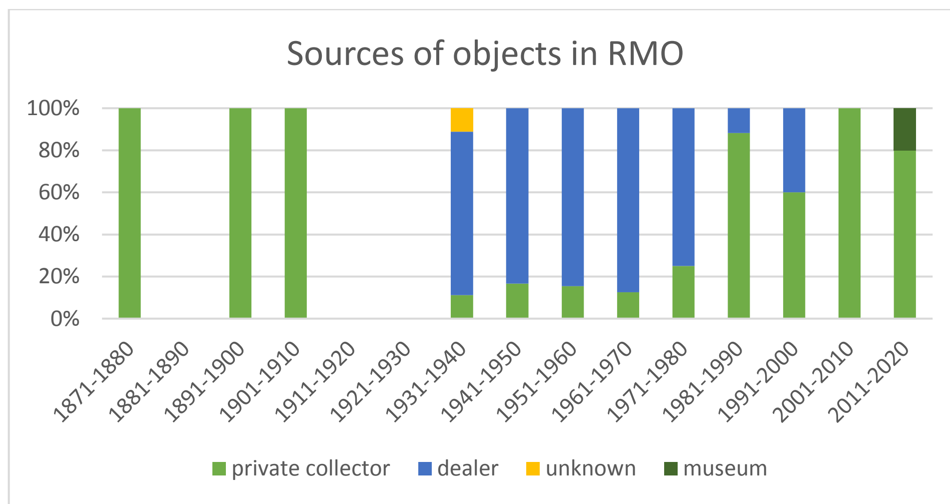


Figure 6: Sources of objects RMO

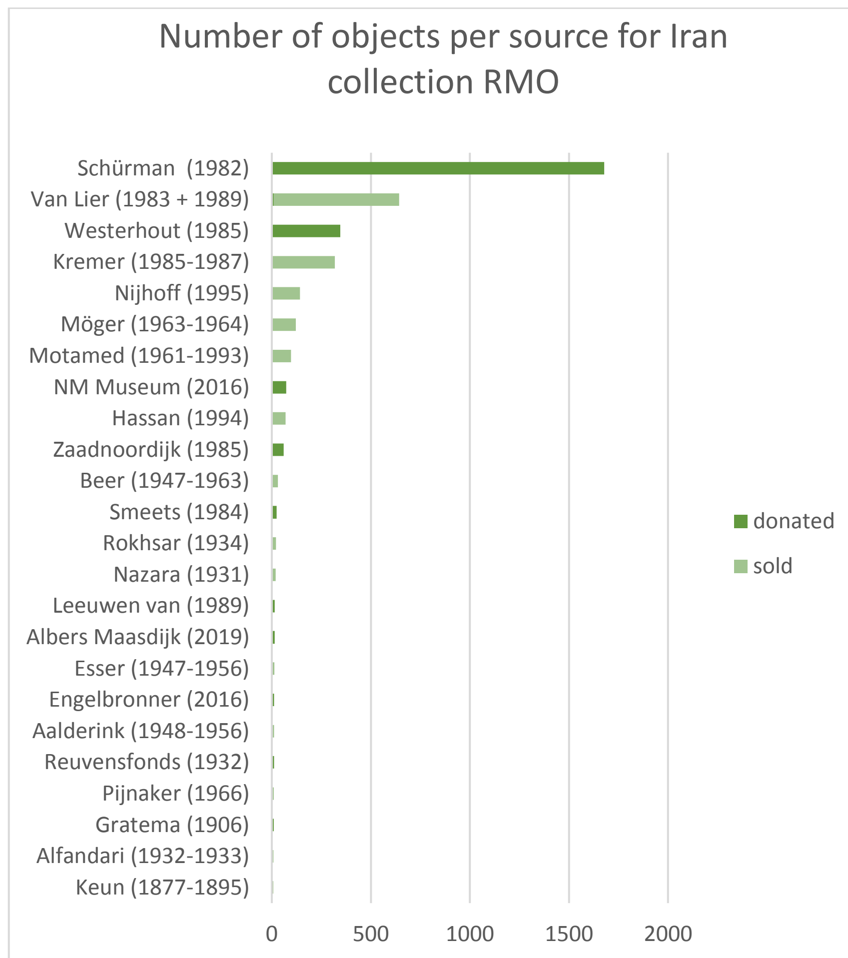


Figure 7: Number of objects per source for Iran collections RMO

The exhibition *Oud Iran. Pre-Islamitische Kunst en Voorwerpen uit Eigen Bezit* displayed 650 objects from Van Lier from December 10 1983 to May 6 1984. The local newspaper, *Leidse Courant*, published a positive review of the exhibition under the heading 'Impressive exhibition about Old Iran' (figure 8). According to the article, this collection was the product of about 100 years of collecting. The author notes that 'the exhibitions have by far not answered all the questions of Iran's history' and that 'perhaps the fact that there have been illegal excavations for many years has contributed to the fact that many objects have disappeared out of the ground'.

Indrukwekkende tentoonstelling over Oud-Iran

LEIDEN — „De directe en oudste erflaters van onze Westerse beschaving" heet het in de woorden van het Museum van Oudheden. Bedoeld worden de volkeren, die in een ver verleden in het oude Iran leefden.

Met wat er terug gevonden is van hun cultuur, is een tentoonstelling in het museum ingericht die als naam „Oud-Iran" heeft meegekregen. Ruim 650 voorwerpen geven een beeld van 5000 jaar Iraanse archeologie en met de tentoonstelling wordt tevens de heer J. van Lier uit Apeldoorn geëerd, wiens internationaal vermaarde verzameling objecten uit Noord- en Noordwest-Iran het museum onlangs kon verwerven.

Met de tentoonstelling wordt ook vooruitgelopen op de inrichting van een permanente expositie over Voor-Azië. Het is de eerste keer dat het museum de schijnwerpers richt op zijn waardevolle verzameling kunst- en gebruiksvoorwerpen uit het oude Iran, die de grootste collectie op dit gebied in ons land is. J. van Lier verzamelde honderden voorwerpen, die met steun van de Vereniging Rembrandt voor ons land konden worden behouden. Namens minister L.C. Brinkman werd de tentoonstelling vorige week vrijdag geopend.

De verzameling oudheden in het museum is het resultaat van ongeveer 100 jaar verzamelen. Pas tegen 1900 werd in Iran begonnen met archeologisch onderzoek. Wat zich precies in het oude Iran heeft afgespeeld, is nog niet bekend. De opgravingen hebben nog lang niet alle leemten in de geschiedenis van het land kunnen opvullen. Wellicht speelt daarbij ook een rol dat er in de loop der jaren illegaal is gegraven, waardoor talloze waardevolle voorwerpen uit de bodem zijn verdwenen.

Twee voorwerpen uit het oude Iran, die op de tentoonstelling te zien zijn.

Verbondenheid

Het eerste deel van de tentoonstelling is gewijd aan de Elamitische cultuur in Zuidwest-Iran en wordt toegelicht met onder andere sculptuur, aardewerk en inscripties uit Susa en Tchoga Zanbil. Het tweede deel belicht de prehistorie en vroegste geschiedenis van Centraal, West- en Noord-Iran met onder meer ceramiek uit Tepe Sialk en Tepe Giyan, bronzen en aardewerk uit Luristan, aardewerk uit Ismailabad en vondsten uit Sakkizabad. Hoogtepunt is het rijke materiaal uit Amlash, Marlik, Khurvin en Kaluraz. In het derde en laatste deel wordt de centrale plaats uitgewerkt die Iran meer dan tien eeuwen innam onder Perzische, Parthische en Sassanidische vorstenhuizen. Onder meer uit de cultuur van de Sassaniden blijkt de verbondenheid van het westen met het oude Iran: de architectuur van zogenaamde vuurtempels is nog terug te vinden in Europese Middeleeuwse kerken.

Uitvoerig toegelicht wordt met [illegible] vazen, bronzen en ijzeren wapens, sieraden, glazen kralen en koralen, foto's van opgravingen en van oude tempels en graven een indrukwekkend beeld gegeven van het oude Iran.

De tentoonstelling in het Rijksmuseum van Oudheden aan het Rapenburg 28 is nog tot 6 mei te zien.

Figure 8: Newspaper article on the exhibition at the *Leidse Courant* on 12-12-1983

(https://leiden.courant.nu/issue/LLC/1983-12-12/edition/0/page/3?query=)

Figure 9: Seals and seal print (inv nr. B 1982/5.1374 and 5.436) and a golden hanger (B 1982/6.19) from the Schürmann collection

Figure 10: Some objects from the collection of Kremer at RMO: bowl from Sakkizabad 5000-4000 BC (inv. nr B 1987/11.1), several objects 1200-600 BC (Van den Boorn & van Es 1989,12,)Necklace from Sakkizabad (inv nr B 1987/11.212).

Figure 11: Objects from Van Lier's collection at the RMO (inv.nr B1983/1.114)

Table 1: Collections acquired by the RMO by year

Year	Name	Number	Objects	Area	Remarks
1963–1964	Mogër	122	Ceramics, rhyton vases, bronzes, golden earrings	Luristan Iran	
1982	Schürmann	1678	Ca. 1600 seals, 70 golden and silver jewellery	Iran Amlash	Most elaborate collection of Sassanidic stamp seals
1983 & 1989	Van Lier	633	Ceramics, bronzes, silver bowls, shell beads, glass beads, golden jewellery	N Iran Sakkizabad, Khurvin, Hasanlu, Ismailabad, Amlash, Luristan	Very high quality Close links to Professor van den Berghe and Professor Neghaban Exhibitions in Europe
1985–1987	K. Kremer	319	Ceramics, bronzes, beads, seals, necklaces,	Khurvin, Mian Kuh, Sakkizabad, Ismailabad, Azerbedjan en Amlash	Very high quality one bowl from 5000-4000 BC , oldest object of Iran collection Close links to Professor Vanden Berghe and Professor Negahban Expositions in Europe Many notes on archaeological context of objects from Sakkizabad
1984–1986	Zaadnoordijk	61	Ceramics: mainly cans and bowls	Amlash, Luristan, Susa, Giyan, Azerbedjan en Khurvin	Mostly polished ceramics from Amlash
1983	Westerhout	345	Sherds, stoneware, beads, coins, figurine fragments, flints	Tchoga Zanbil, Haft Tepe, near Susa	Surface finds, also Islamic, to combine with excavations of Negahban
1984	Smeets	24	Sherds	Marvdasht, near Persepolis	Pre-historic, between 5000-2000 BC
1994	Hassan	70	Bronzes and some ceramics		
1995	Nijhoff	122	Stone fragments of figurines, ceramics, necklaces with glass beads, bricks with cuneiform script		Elamitisch, 2000-1000 BC
2016	National Military Museum	73	67 Bronzes 3 Ceramic beakers	Luristan	Transferred to the RMO

The catalogue of the RMO also notes whether objects are fakes or forgeries. Eighty-four objects, of which 44 are from Iran, have a reference stating that they are 'false'. The search term 'forgery' returned 11 objects from the Near East collection, of which seven were from Iran, of which two also had the search term 'false'. Some objects are explicitly characterised as fakes or forgeries, while others have a question mark. The list includes objects from collectors as well; four objects from Van Lier and 14 from Schürmann. There is no certainty that there are no fakes or forgeries in the museum other than these that are mentioned in the catalogue. Three objects are on display at the RMO and are labelled as being 'false'.

The RMO currently displays Near Eastern objects that are labelled 'Heritage under Threat'. The text states that 'Every museum holds objects that could not be acquired under today's laws and ethical principles (…) this was possible because, at the time, there were hardly any legal barriers (…) These days, every country has such laws'. Afterwards it is stated that 'when reflecting in a museum, we must always reflect on the ethics of collecting'. The text concludes with questions such as whether objects should be returned and whether objects that were acquired officially in the past should now become illegal.

4.2 The Rijksmuseum van Oudheden's acquisition policy

Before the 1970 UNESCO Convention, there were not many guidelines regarding the ethics of acquisitions by museums. This slowly started to change and museums introduced codes of ethics and revised their acquisition policies. However, this is often thought to be window-dressing instead of actually taking action and implementing the policies in a rigorous manner (Watson and Todeschini 2006, 32).

Since most collections are currently in the RMO, as opposed to other Dutch museums, the focus of this section is on the acquisition policy of the RMO at around the time that most Iranian objects were acquired, namely the 1980s.

The acquisition policy of the RMO between 1970 and 1993 has been analysed by Noé Michael (2013). Noé states that the RMO did not introduce a policy on acquisition until the beginning of 1994, when the first collection plan was drawn up. According to Professor Halbertsma, the curator of the classical department, the museum had bought archaeological artefacts randomly during the previous years and no questions had been asked about their provenance (Michael 2013, 30). Correspondence kept in the RMO archives support Halbertsma's assertion; the curators received letters from many art dealers and private collectors. However often no questions were asked about provenance, but only sometimes about authenticity. Halbertsma states that 'it is important to understand the common belief that objects belonged in museums and not on the art market, where they might disappear into private collections' (Interview: Michael with R. Halbertsma 2013, 154).

An example of the way in which some objects were acquired can be seen from art dealer Saeed Motamed, who wrote many letters to the curator about buying his objects. He writes that he has a

catalogue of photographs attached to the letter, in which one can see the objects. He then says that if there is any interest in any of the objects, he can bring them to the museum (RMO-archief: nr M.5.410).

In the second half of the 20th century, antiquities often became too expensive for museums to acquire, partly because of the UNESCO 1970 convention that was introduced, and because provenance became more important than previously and antiquities with provenance became more expensive. There was also an economic depression in the Netherlands, resulting in the budget of the RMO shrinking. In a letter from RMO director Hans Schneider in 1983, in response to art dealer Saeed Motamed, he says, 'Although I am much aware of the great importance of the many pieces you have to offer to this museum, I let you know that there is no chance whatsoever of acquiring any antiquities in the art market as long as budgets of museums in the NL are shortened because of the economic depression' (RMO-archief: nr. M 5.410)

The first collection plan was drawn up in 1994 from the *Beleidsplan* in 1993, although it did not really focus on the legal and ethical aspects but more on what kinds of objects should be bought.

This collection plan stated that the museum should be more active in the purchase of antiquities; the goal was to go abroad and visit fairs, and that the International Council of Museums (ICOM) Code of Ethics should be respected (Michael 2013, 31). However, there were some comments in this policy that could be used as loopholes. The level of due diligence was lower for a donation than a purchase in those days, making it easier to receive a donation without too many complications regarding provenance. Furthermore, the last sentence of the policy states that *'unexpected lucky strikes should always be judged upon their merits'* (Michael 2013, 31). This, of course, could suggest that none of the rules applied to objects that were, perhaps subjectively, perceived as a 'lucky strike'.

4.3 Acquisition of Iranian collections by the Rijksmuseum van Oudheden

Guido van den Boorn was the curator of the Near East department from 1980 to 1988. During an interview, he elaborated on the process of acquiring the Iranian collections. After he graduated from university, he was asked by the former director, Hans Sneijder, to become the first curator of the Near East department at the RMO. He had been given the task of managing and rearranging the current Near Eastern collection and he also got to set up an education department. He described the situation when he arrived at the museum as chaotic and explained that there was generally no interest at all on the part of other RMO employees in the Near Eastern department. He says that all notes on Near Eastern objects were written randomly on objects and he had to start writing up an inventory himself from the beginning. There was no information at all on the Iranian objects before he came to the RMO (Interview van den Boorn, 3 March 2021).

This coincides with the account of Holwerda, who, decades earlier, seemed to randomly acquire some Near Eastern objects in the early years of the RMO. He states that 'in the past months, we have been

overwhelmed with all kinds of offers, so important that I cannot refuse them' (Holwerda 10 March 1931). Holwerda was overwhelmed with propositions of art objects from Luristan and said that he had 'no other choice than to acquire some of them for the museum' (Petit 2013, 112). For example, in the 1930s, a variety of bronzes were bought from art dealers. From 1945 onwards, the acquisition of Luristan bronzes by the museum bought on art markets decreased because of the risks of forgery (van den Boorn 1983, 8).

When Van den Boorn arrived at the museum, many Near Eastern objects owned by the RMO were spread out across several institutions in the country, mostly due to a lack of space for the objects in this department. Van den Boorn visited the institutions to see what objects the RMO had in its inventory. One of his visits was to the AP, where he saw a small part of Van Lier's collection and was immediately impressed. Those who knew of this collection within the museum world were the curator of the Allard Pierson at that time, Robert Lunsingh Scheurleer (1944–present), and archaeologists Maurits van Loon (1923–2006) and Jaap Hemelrijk (1925–2018) from the University of Amsterdam. Van Loon and Hemelrijk had assisted Lunsingh Sheurleer with the acquisition of the Van Lier collection. Lunsingh Scheurleer told Van den Boorn about the enormous number of Iranian objects Van Lier had collected and stored at his house (Interview van den Boorn, 3 March 2021).

Van den Boorn asked for Van Lier's address and visited him at his home in 1980. Van Lier told Van den Boorn that he insisted from the start that the largest part of his collection should go to the RMO as a national museum of antiquities. Van den Boorn said that Van Lier had two houses in Apeldoorn full of objects, one to the brim. Van Lier explained to Van den Boorn that he really needed to find a place for his artefacts. During the same year, collector Schürmann called van den Boorn to ask whether he would be interested in his collection of seals. Slowly, he began to realise that this was not the only remarkable Iranian collection and that there were more out there. Van den Boorn discussed the situation with Sneijder and they came to the conclusion that, from now on, they would actively seek Iranian objects (Interview van den Boorn, 3 March 2021).

Van den Boorn came into contact with Kremer through Van Lier. Kremer was a bit suspicious and reserved at first, because he had been approached over the years, often in a rather hostile way, by many art dealers who were interested in his objects. It seems that, although the museum community was not particularly aware of the existence of the Iranian collections, the art dealer community was already informed. Van den Boorn explained that it took a long time to convince Kremer that he was only interested in the important historical value of the collection (Interview van den Boorn, 3 March 2021).

In the following years, more objects were acquired from private collectors by the RMO. These private collectors are described in detail in chapter 5.

4.4 The Allard Pierson

The AP was founded in 1934 to host the archaeological collection of Professor Allard Pierson (1831–1896), Jan Six (1857–1926) and banker and amateur archaeologist Constant Lunsingh Scheurleer (1881–1941). In around 1900, the son of Allard Pierson started the Allard Pierson Foundation and created a fund of 250,000 guilders to acquire antiquities for the museum.

The museum acquired objects from private collections and from excavations by the University of Amsterdam. The archaeological collection of the museum was focused mainly on Egyptian, Greek, Roman and Etruscan antiquities.

In 2020, according to the museum's online catalogue, the collection contained 95 objects from Iran. Most of them had been acquired between 1970 and 1990 (figure 11). A large part of the Iran collection consists of objects from collector Van Lier that were not derived from scientific excavations. It is likely that the Iran collection of the AP is larger than the 95 objects in the online catalogue, because some objects that are described as new acquisitions in the museum's magazine, such as seven cans from Van Lier and a gift from Mr Polak, are not recorded in this catalogue.

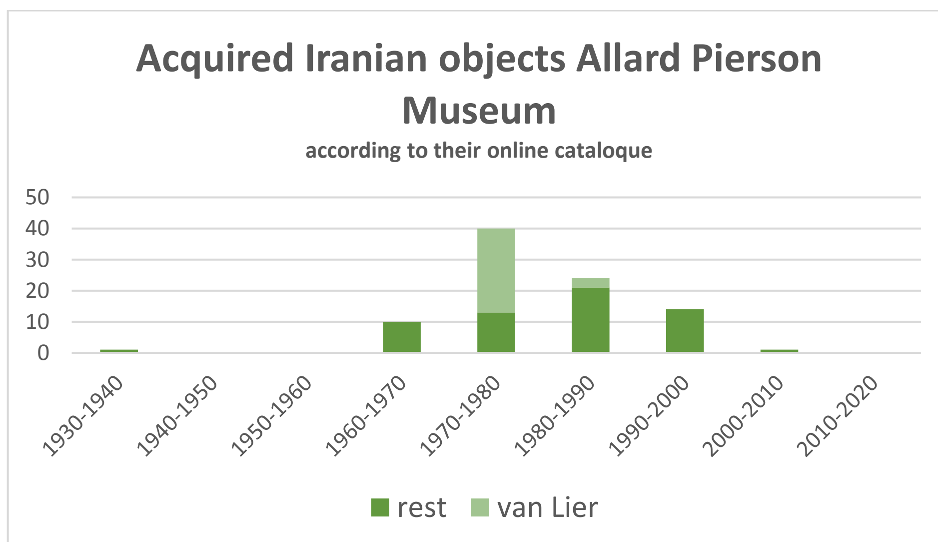


Figure 12: Iranian objects acquired by the AP

In 1965, Jack Hemelrijk became the director of the AP. He knew about the collections of Van Lier and Kremer, because the son of Kees Kremer had been a pupil in his class when he was a teacher (Hemelrijk 1989, 11). The first thing Hemelrijk did was to host an exhibition titled *Oud Iran*, which was held in 1966 in Brussels, Gent and Utrecht, in the AP in 1968.

Van Lier was closely connected to the AP. When the Association of Friends of the AP was founded in 1969, Van Lier was the first secretary, a post he held until 1975. He remained a board member of the association until 1985 (Beek 2009).

The museum moved to its current building in 1978, the former Bank of the Netherlands. For this occasion, objects from Van Lier's collection were bought with money from the Pierson, Helldring and Pierson bank. These objects were mainly ceramics and jewellery from Amlash, such as golden earrings, belt buckles, and necklaces with gold and glass beads (Wild-Wulker and Crouwel 1976, 11-14). A few months before his death in 1989, Van Lier donated another five vases to the museum (Crouwel 1989, 13).

According to Hemelrijk, Van Lier sold his most beautiful objects (gold, silver and polished ceramics) from Amlash to the AP (Hemelrijk 1989, 12), mainly from Amlash and Luristan, while the RMO had a much broader collection. Kees Kremer chose to give a completely different object to the museum, a 6000-year-old vase, which complemented the AP collection.

Table 2: Objects acquired by AP by year

	Objects	Area	Dated	Acquired from
1930–1940	Clay tablet	Iran		Unknown
1960–1970	7 bronzes 1 beak can	NW Iran, Luristan		Art dealers/auctions
1970–1980	17 x gold jewellery	Amlash	1400-200 BC	Bought from Van Lier
	3 silver plates/bowls	Amlash		Bought from Van Lier
	6 x bronze objects	Luristan		Bought from Van Lier
	1 vase	Islamabad	4000 BC	Gift from Kremer
	2 cylinder seals		1000BC	Possibly bought from Ms Levelt-Hoogvelt
	7 bronzes	Iran		Unknown
	1 tile			Gift
	3 ceramic objects			Unknown
1980–1990	3 cans ceramics	Amlash		Gift from Van Lier
	6 bronzes	Luristan		Anonymous gift
	5 bronzes	Iran		Anonymous gift
	1 ceramics	Marlik		Bought
	5 ceramics	Iran/Gilan		Anonymous gift
1990–2000	13 bronzes	Iran		Gift from Ms Polet
2000–2010	1 plaquette	Iran		Legate

Additions were made to the Allard Pierson collection throughout the 20th century, with objects being received from Van Lier, Kremer, Levelt-Hoogveld and Turner (Petit 2014, 82). Van Lier's collection is described in the magazine of the Friends. In 1985, Kees Kremer donated three vases to the museum (Frenkel 1985, 25). In 1984, collector Polak donated 10 vases from Iran to the museum, which he had bought at a Sotheby's auction (Crouwel 1985, 10-13).

Other acquisitions are labelled as being from anonymous donors, so it is uncertain which objects within the collection are from Levelt-Hoogveld and Turner. Ms Levelt-Hoogveld was the widow of the Dutch ambassador to the Iranian embassy in Teheran and Van Lier states that they were both active collectors (Hemelrijk 1989,8).

Figure 13: Objects from the Van Lier collection at the AP from Amlash (1200-1000 BC), Amlash (1200-1000BC) and Kremer at AP: from Sikaazabag 4000 BC (Hemelrijk, 1989; Frenkel 1985).

Figure 14: Objects from the Van Lier collection at AP from Amlash (1200-1000 BC) (online catalogue AP)

Van Lier's collection is on permanent exhibition at the AP in the Near East department of the museum (figure 14).

Figure 15: Permanent exhibition of ceramics from Van Lier' collection at the AP (Scheurleer 2009, 78)

4.5 Keramiekmuseum Princessehof in Leeuwarden

The Princessehof was founded in 1917, when the city counsel of Leeuwarden granted the city palace of Marie-Louise van Hessel to Dutch collector Nanne Ottema (1874–1955) to present his private collection. Ottema was a notary with a passion for ceramics, mainly of Chinese origin, but his collection was extremely broad. Nowadays, the Princessehof presents itself as a museum for private collections. However, they also actively acquire contemporary ceramics because the museum has as a mission to 'connect the East and the West and the past with the present'.

The Asia collection (Near East included) of the museum currently consists of about 8,200 objects, which are mainly Chinese ceramics. According to its online catalogue, the museum has 373 objects from Iran in its collection, which are mostly Islamic objects. It consisted in 2020 of mainly tiles and bowls, but oil lamps, cans, some glassware and tapestry were also included.

According to the catalogue, its pre-Islamic collection consists of 101 objects: 72 ceramics and 29 bronze objects. About 11 beak cans, 28 jars, nine animal figures, 10 bronze cloth pins or belt buckles, 15 pots, seven bowls and several other objects are recorded in the catalogue. The vast majority of the Iranian objects at the museum originates from the private collection of Ms. Hillegonda Janssen.

Table 3: Objects in the Iran collection from Ms. Hillegonda Janssen and Princessehof museum (based on Bosman 2011, 10 and the online catalogue of the Princessehof Museum)

Year	Name	Number	Objects	Area	Remarks
1997–2005	Janssen	367	129 pre-Islamic bronzes 83 pre-Islamic ceramics 177 Islamic ceramics Other objects (glass and 19th century textiles	Luristan Sakkizabad, Khurvin, Kaluraz, Azerbedjan	Not only pre-Islamic , but also Islamic ceramics from the 11–14th century AC

In total, the Hillegonda Janssen collection consists of 367 objects. This collection comprises 85 pre-Islamic ceramic objects and 177 ceramic objects from the Islamic period. In 1997, she donated some objects and in 2001 she donated 250 objects to the museum (Terlouw 1997; Bosmans 2011). Her collection was exhibited at the *'Keramiek uit Iran* exhibition from May 3 to August 17 1997 at the museum in Leeuwarden.

Figure 16: Objects from the Hillegonda Janssen collection at the PM from Khurvin and Azeberdjan (1200-1000 BC), Amlash (1200-1000BC) and Amlash (200 BC) (Bosmans 2011)

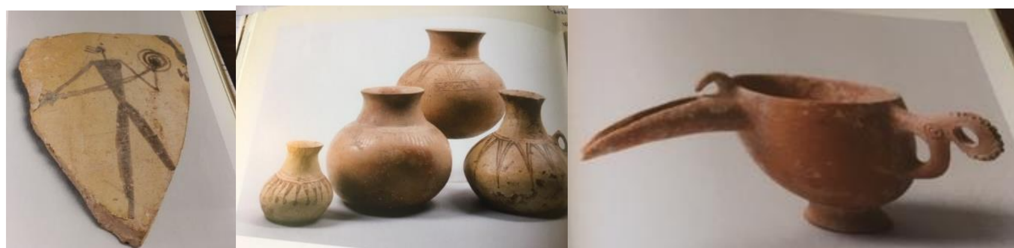


Figure 17: Objects from the Hillegonda Janssen collection from Tepe Sialk (4000 BC), Luristan (1000 BC) and Kaluraz (800 BC) (Bosmans 2011)

Figure 18: Objects from the Hillegonda Janssen collection from Sakkizabad (1500 BC) and Khurvin (1200 BC) (Bosmans 2011)

Figure 19: Objects from the Hillegonda Janssen Islamic collection from Nishapur (900-1000AD), Iran (1200-1300 AD) and Kashan (1200-1300 AD) (Bosmans 2011)

Ms Janssen started to donate Islamic pieces to Princessehof through the *Ottema Kingma Stichting* (OKS) in the 1990s. Larger donations of both Islamic and pre-Islamic pieces were made in 1997, 1999 and 2000, followed by several donations from 1999 to 2005. Although the entire collection was officially donated to the Princessehof Museum through the Ottema Kingma Stichting, it was agreed that Ms Janssen would retain a small number of objects herself.

Jacob Van Lier sold some pre-Islamic objects to the Princessehof museum (Hemelrijk 1989, 15), but the private collector is not mentioned in the museum's catalogue. Moreover, the year of the transfer of Van Liers' objects to the museum is unclear.

In its collection strategy (Keramiekmuseum Princessehof 2018), the museum states that it will focus on collections from Asia and Europe. The museum receives many offers to take on collections. Therefore, it has a strict selection procedure to determine which objects and which collections it wants to acquire.
In 2021 the collection as to be transported to a new depot, and the museum intended to use this event to remove non-ceramic objects from its collections. The goal was that other museums would be found to host the non-ceramics objects by 2021 (Keramiekmuseum Princessehof 2018). From the catalogue analysis, this means that new owners have to be found for 29 pre-Islamic Iranian objects. The museum has a collaboration with many museums in the Netherlands, but the RMO is not(yet) one of them.

4.6 Summary

The Iran collection of all three Dutch museums consists mainly of objects from private collections. Some objects at RMO and Allard Pierson were obtained from art dealers or auction houses during the first half of the 20th century, but this decreased after 1960. Almost all private collections were assembled in the 1960s and sold or given to the museums about 20 years later, in the 1980s. Only Hillegonda Janssen kept collecting during the 1970s and 1980s, after leaving Teheran in the 1960s. An overview of the collectors and their collection will be provided in table 4 in the summary of the next chapter. It indicates that most artefacts in the Dutch museums originate in the north of Iran. Popular collectors' items came from the Amlash region, Khurvin, Luristan, Sakkizabad and Azerbedjan, probably because those places were close or relatively close to Teheran, and most of the collectors worked or visited people who worked in the neighbourhood of Teheran. Hillegonda Janssen is the only collector who also collected Islamic ceramics. In the next chapter, more information is provided on how Van Lier, Kremer and Hillegonda Janssen acquired their collections and what their motives were.

5. Collectors

5.1 Jacob van Lier

Jacob van Lier (1902–1989) was an advisor to the Persian government and lived in Iran from 1960 to 1963. He was interviewed in August 1982 on how he acquired his collection in Iran by Guido van den Boorn, the former curator of the Near East department of the RMO. A report of this interview was published in the AP's magazine (Hemelrijk 1989) in memoriam of Van Lier after he died in 1989.

Van Lier was interested in ceramics from a young age. This interest was inspired by a favourite uncle who was a designer at the *Porseleine Fles*, a Dutch ceramic factory (Rulkens 2016, 13; Hemelrijk 1989, 4). Before he started to collect ceramics and other objects in Iran, Van Lier had worked in Batavia and Celebes and had acquired a collection of 800 Indonesian and Chinese porcelain objects from the 16th century. His entire collection was lost during the Second World War under the Japanese occupation of the Dutch East Indies.

Later, in 1960, Van Lier got a job in Iran as a harbour advisor, a position that was created by the Netherlands through the World Bank. Once he had taken the job, he found that he had been assigned the position of harbour advisor for the Persian government. He worked there for three years, from 1960 to 1963. The job turned out to be a failure, in his opinion, since he felt he was unwanted and the government was unwilling to cooperate with him. He immersed himself in his hobby of collecting through an unknown Dutch contact, the same one who had secured him this job. This man had already collected some objects from Khurvin (Hemelrijk 1989, 9).

Van Lier and his Dutch contact went on visits to Khurvin, where they witnessed an excavation. He met a young Persian boy who suggested he could help him. Van Lier observed that Khurvin was already almost '*emptied out'* during this time. Amlash however, was just being re-explored and was difficult to reach, which was an advantage. In October 1960, the Persian boy gave Van Lier objects from Khurvin that were very good and sold for 'reasonable prices'. After he had collected about 50 objects, he started paying the boy about 200 guilder (approximately 900 euros according to today's exchange rates) per month to travel to Amlash for him (Hemelrijk 1989, 9). The archaeological site Marlik, known for the famous royal burials that Professor Negahban was excavating, was close by. Van Lier joined Negahban occasionally on his excavations. He also acquired objects from Sakkizabad. Van Lier obtained about 600 objects over the course of two years (Hemelrijk 1989, 9).

Van Lier visited other archaeological sites, such as the one at Sakkizabad, with his friend, the collector Kees Kremer. He explained that Sakkizabad had already been looted to a great extent by the locals. He said that after they left, a necropolis had been found and he tried to immediately buy objects and persuaded them to bring the objects to Teheran. He explained that they would go on expeditions on

Fridays, in which they would ‘follow the car tracks in the desert to find small villages with potential archaeological sites’. The people were ‘extremely poor and always very hospitable’ (Hemelrijk 1989, 10).

He also spoke of some students who had bought objects while on vacation in Persia. Some had been ‘obviously messed with’ but there was ‘this one deer-like figurine in dark grey that was in a very good state that someone had got for a relatively small amount, 200 dollars’, in extraordinary circumstances. The museum would take photographs and study the objects (RMO-archief: nr. 06.04.02/15.04).

According to Van Lier, antiquity dealers sold many objects in Qazvin to avoid getting caught on their way to Teheran. Van Lier states that he preferred buying objects in Qazvin, as opposed to Teheran, since it was more reliable and cheaper. He explained that the shops in Qazvin were filled with mounds of bronzes. He mentioned that the Luristan Bronzes were extremely expensive and often inauthentic. He also explained that he would buy objects and give them to friends (Hemelrijk 1989, 10).

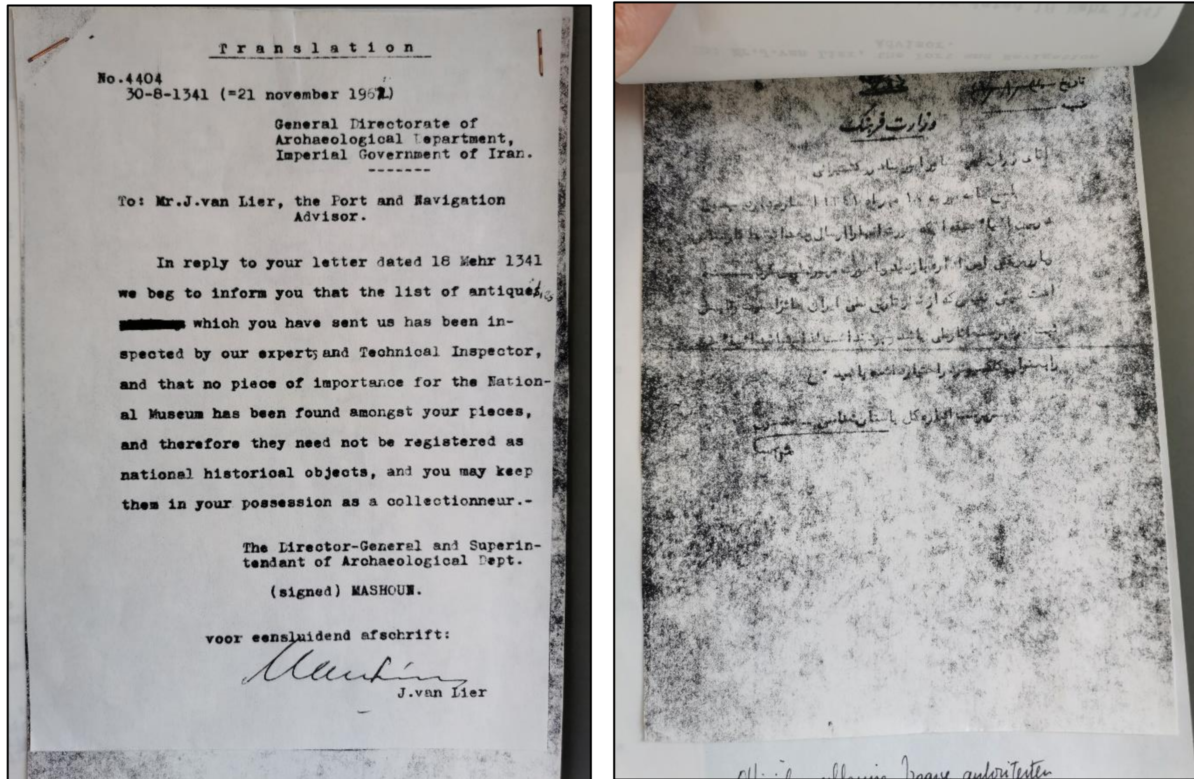
Van Lier said he bought clay tablets and a special ceramic boat from Ismailabad from a tapestry trader in Teheran (Hemerijk 1989, 10).

Van Lier eventually started thinking about collecting larger amounts of objects and how they could be transported. He was lucky that the Dutch ambassador, H.J. Levelt, and his wife Mies had a passion for collecting as well. Through them, he got into contact with the most well-known archaeologists, Professors Mogahdam and Negahban, whom he described as ‘very friendly and welcoming’. Van Lier wanted to attract more tourists to the country and thought that so far not much effort had been made to increase tourism. He wanted to do this by creating a large study collection for European museums but he needed permission to do this (Hemelrijk 1989, 10).

Van Lier mentioned in the interview that the collecting of archaeological material was officially forbidden. One was allowed to transport only five or six objects out of Iran. However, both professors agreed that it was important to showcase Persian material in European museums. They discussed the idea with the ministries and Van Lier got acknowledged as a ‘collector’, which meant he could own objects. The idea was that, in time, a commission would be appointed that would decide which ones should remain in Iran and which ones could receive an official export permit (Hemelrijk 1989, 10).

Two inspectors from the Archaeological Service in Iran needed to go through Van Lier’s collection to decide which objects he could keep. They decided that only 12 objects should remain in Iran, to the surprise of Van Lier himself. Afterwards, a commission would decide about the export permit. He knew that the head of the commission was Professor Mogahdam and that Professor Negahban was a member as well. Van Lier left Iran in December 1962, leaving the collection at the Archaeological Service so that the commission could arrange the export documents. It took six months for the commission to come together to decide about the export permit. It then took another couple of weeks because the Ministry of Finance wanted to know where Van Lier had gotten the money to buy all these objects. This led to an

extra fine of 10% of the value of the collection. He eventually got permission from the authorities in Iran to export his collection. The export permit still exists and is in the RMO's possession (figure 19). After another month, the collection was finally transported out of Iran in a van. Some pieces appeared to be missing in the Netherlands and the export contact person had forgotten to insure the objects. Van Lier described the whole process as chaotic.



Translation

No.4404
30-8-1341 (=21 november 1962)

General Directorate of
Archaeological Department,
Imperial Government of Iran.

To: Mr.J.van Lier, the Port and Navigation
Advisor.

In reply to your letter dated 18 Mehr 1341 we beg to inform you that the list of antiques, which you have sent us has been inspected by our experts and Technical Inspector, and that no piece of importance for the National Museum has been found amongst your pieces, and therefore they need not be registered as national historical objects, and you may keep them in your possession as a collectionneur.-

The Director-General and Superintendant of Archaeological Dept.

(signed) MASHOUN.

voor eensluidend afschrift:

J.van Lier

وزارت فرهنگ

Figure 20: Approval of objects for export and the export permit in Arabic (retrieved from RMO archive)

The collection was transported to Gent, where Professor van den Berghe promised to go through it. After three years, in 1966, the collection was exhibited in Gent, Brussels and Utrecht. Van den Berghe compiled an elaborate catalogue for this exhibition, which included not only objects from Van Lier, but also from Kremer and the Royal Museum of Art and History in Brussels (Van den Berghe 1966). Writer Cees Nooteboom wrote a poetic, positive review about the exhibition in Gent (in Petit 2018, 433). He writes that 'the objects stand untouchable, the hands that made the objects have become nothing more than air, only the objects remain (…) I will leave the museum, the objects will be packed and will move on, saying nothing more about the makers than the fact that they were made, mysterious, always empty pots and bowls, that have more time on their hands than we do' (Nooteboom 27-06-1966).

In 1966 or 1967, an exhibition was organised in the AP in Amsterdam of 600 objects, including 29 from the Kremer collection (Petit 2018, 434). Marie-Louise Buhl from the National Museum of Denmark in Copenhagen also looked through the collection and exhibited it in the museum in 1968 (Bühl 1968).

In 1978, Van Lier and Kremer sent 73 objects to London for an auction at Sotheby's (RMO inv.nr. M.5.4II). On 10 April 1978, 49 objects were sold and the others remained at Sotheby's. The objects included 30 bowls, four jugs, 14 jars, three globular vessels, two spouted vessels, five cups, two vases, three flasks and one kettle. There were also nine jewellery pieces: three maceheads, one dagger, two golden earrings and two necklaces with gold beads. The total value of the objects was estimated at 26,000 guilder (RMO inv.nr. M.5.4II). Forty-nine objects were auctioned off and 24 remained at Sotheby's.

It took five years to retrieve the unsold objects from Sotheby's. Two items got lost, for which Sotheby's had to pay a compensation fee of 500 pounds (Petit 2018, 430). Many letters were exchanged between Mr Oliver Forge from Sotheby's and Guido van den Boorn (RMO-archief: nr. 06.04.02/23.01).

In 1982, Van Lier sold a collection of 643 objects from the prehistoric to the late-Sasanian period to the RMO, which the museum acquired with the help of the Rembrandt Association. The total price of the collection was 65,000 to 70,000 guilder. The RMO contributed 35,000 guilder and they applied to the Rembrandt Association for the rest (RMO-archief: nr. B 1983/1.1-630). It is noted in the application that this is 'not the actual market value and that the collection is worth a lot more' (RMO-archief: nr. B 1983/1.10630).

In the application for funding, it is explained that the finds had been reported to the Iranian Archaeological Service. In the application it is stated that the Service had been lacking the money and time for an official archaeological excavation and it appeared that no special measures were being taken to prevent unofficial excavations by the population nearby. As for the value of the collection, it is noted in the application that 'the value is not only estimated because of the quality of the objects (…) the certainty with which the provenance of every object has been documented by Van Lier increases the value in contrast to the obscure trade in antiquities that is derived somewhere in the northwest of Iran' (RMO-archief: nr. B 1983/1.1-630).

With regard to the certainty evident in the application, the documentation of the origin and dating of the objects is in reality extremely complicated and never certain, since none of the artefacts were acquired through scientific excavations. However, the elaborate documentation of Van Lier and comparison material made it easier to state that most of the objects were from the Gilan province near Amlash.

The Van Lier collection was exhibited at the RMO in 1983. A reviewer of the exhibition in Leiden in 1983 described it as 'all indescribably beautiful' (Leids Dagblad , 15 December 1983) and another, writing for the Telegraaf, wrote that 'the museum surprises the public with a collection of art from Iran' and described the objects as 'beautiful art pieces' (De Telegraaf, February 3 1984). A few months before his death in 1989, Van Lier divided some remaining pieces between the AP and the RMO.

In 1995, the British Museum acquired four objects, originally from 'Kremer and Van Lier', which were donated by Ernst Karl Litthauer (OBE) with the help of the National Art Fund (RMO-archief: nr B 1987/11.1-237). The following four objects are still present at the British Museum:

1995,0622.3 – Excavated/ findspot: Sakkizabad/ Qazvin

1995,0622.8 – Chandar (Iran)

1995,0622.7 – Iran North

1995,0622.1 – Iran

Van den Boorn (2021) mentioned that he did not know about this, and that it is strange that the objects were from Kremer as well as Van Lier, since they did not share ownership of any object (Interview van den Boorn, 3 March 2021). Kora Kremer noted that van Lier and Kremer sold their objects separately through Sotheby's but that none of Kremer's objects were sold. She recalled this was because Kremer's material did not have a high market value since the material was not regarded as very aesthetically pleasing; in comparison to van Lier's Amlash objects that had a higher market value (Interview Kora Kremer, 17 April 2021).

It is unclear how Litthauer acquired the objects, but we know that he was an active collector. According to the register of the British Museum, the objects had been in the owner's possession since somewhere between 1968 and 1976. This would mean they were not part of the auction at Sotheby's that occurred in 1978.

Hemelrijk (1989) describes the collection of Van Lier as 'fabulous'. He concludes his article on his interview with Van Lier as follows: 'When I saw the National Museum in Teheran in 1970, the collection was by far not as special as Van Lier's collection on display at the AP' (Hemelrijk 1989, 12).

5.2 Kees Kremer

Kees Kremer (1920–2005) was an engineer who worked in Iran for the oil company Esso from 1957 until 1977. The author of this thesis interviewed his daughter, Kora Kremer, about her father on 12 September 2020 and 17 September 2020.

Figure 21: Kees Kremer (third on the photograph) on an archaeological visit to Sakkizabad (personal archive, Kora Kremer)

Kremer was actively involved in describing and documenting the archaeological contexts of the objects he collected. Letters in the correspondence archive of the RMO show that he contacted professionals mainly in the academic world to discuss the interpretations of his finds. In his personal archives, which Kora Kremer generously shared with the author, there are multiple maps with notes that show his detailed locations, interpretations of form and use, drawings and photographs. He made notes, not only on his own objects, but also on the collections of other collectors with whom he was in contact, such as collector Smeets.

Kora Kremer revealed that her father often visited sites himself and that her brothers sometimes joined him. The following find spots from his collection are known: Khurvin, Mian Kuh, Azerbedjan, Sakkizabad and Amlash. Kremer's detailed documentation and objects from Sakkizabad (sometimes called Sagzabad) are regarded as most important, since Sakkizabad has been looted to a large extent and because the site is unique for a rare type of painted pottery (Van den Boorn 1983, 16).

In an annual report from 1987 by the Rembrandt Association, the following about Kremer's collection is stated: 'Archaeologically, Sakkizabad has become famous because of the material that reached the art markets in the fifties. The site has been looted to the extent that scientific research is almost impossible. This is why it is very good that Kremer has acquired this unique collection. In light of the illegal

excavations surrounding Sakkizabad, Kremer promised himself to collect as many typical materials as possible in one whole collection. He then compiled comprehensive documentation, in which valuable archaeological information has been gathered' (RMO-archief: nr. B 1987/11.1-237).

In a letter to Dr Charles Burney (1930–present), a British archaeologist who excavated Yanik Tepe in Iran from 1960 to 1962, Kremer told him that 'between the years of 1961 and 1968, the site of Sakkizabad had been actively excavated commercially and very thoroughly by locals, and that he bought many of their finds' (RMO-archief: nr. B 1986/1.1-79). From this account, it appears that Kremer bought the objects from locals on commercial excavations. Kora Kremer mentioned that Kees Kremer insisted to buy Sakkizabad objects in Sakkizabad itself and not in Teheran to ensure the location of where the objects were found (Interview Kora Kremer, 17 April 2021).

In a letter from 1968 to Van Lier, Kremer states that he found a number of inhabitants excavating a newly-discovered necropolis near Sakkizabad (RMO-archief: nr. 06.04.02/15.02). He mentioned that 'the finds had been reported to the Iranian Archaeological Service but my take is that they lacked time and money for an official archaeological investigation and that it appears no measures were being taken to prevent unofficial excavations by the populations nearby'. In his personal opinion, this was 'a pity since the finds could be important to compare to another sequence' (RMO-archief: nr. 06.04.02/15.02).

Figure 22: Looting at Sakkizabad from a photo taken by Kees Kremer (personal archive Kora Kremer)

Kremer seems to have had no confidence in the speed with which documents about Persian archaeology were published and he believed it was unlikely that a comprehensive history of Sakkizabad would ever be published (Archive, Kora Kremer). He writes that Professor van den Berghe made notes on his collection during exhibitions in Europe and that he is planning a much bigger publication. However, he mentions

that, for political reasons, it may well be another couple of years before it materialises. It seems Kremer felt the urge to publicise and research Sakkizabad due to the extensive looting. In a letter in 1985, to a Dr Emiel Frenkel, the former curator of the AP, Kremer says he would like to publicise the whole story of Sakkizabad in the future but that it would take some time (Archive, Kora Kremer).

Kees Kremer's involvement in archaeology reaches as far as criticising the work of archaeological academics. In a letter to thesis student Windey van Geert, he explains that he does not believe Professor Negahban will publish his research on Sakkizabad. He says that he has 'some criticism that the articles he wrote are too simplistic, confusing and sometimes incorrect' (Archive, Kora Kremer). He suggests he could share his own thoughts on the matter.

In the correspondence between Kremer and Van Geert, it is clear that Kremer is thinking about exhibitions of his collection. He talks about useful photographs and videos that he has made of Ismailabad and Sakkizabad. Van Geert wrote her doctoral thesis at Ghent University and in an article based on her thesis in 1978 she states that 'the pottery described in this article represents the spoils of commercial excavations during the late fifties and sixties at the pre-historic sites of Sakkizabad. Thousands of pots, hundreds of bronzes, stone artefacts and personal ornaments were dug out by villagers and sold, many of them in situ, to collectors' (Archive Kora Kremer). This statement makes it once more clear that Kremer's collection was not scientifically excavated. Within this article, it is also said that 'information as to the locations of the finds received from illegal diggers leads us to believe that during these periods the finds were concentrated in the central part of the mound' (Archive Kora Kremer). It seems that the provenance was constructed on the basis of the indirect information of illegal diggers.

Van den Boorn (interview 2021) mentioned that Kremer had a permit to export his collection and that he saw the permit at Kremer's house. He believed Van Lier showed him how to apply for a permit after Van Lier received a permit himself. Van den Boorn thinks that it definitely helped that both collectors were in close contact with influential archaeologists such as Dr Negahban and Van den Berghe, because they encouraged their goal to exhibit collections in European museums. In a letter to Van Lier in 1976, Kremer says that Professor Van Loon (1923–2006) of the University of Amsterdam had some concerns about unofficially excavated objects (Archive Kora Kremer). He says that he sent Professor Van Loon some artefacts and showed him a copy of his official permit as a collector of the Archaeological Service. He also showed letters of correspondence with 'Asia Travel' about the transfer to the Archaeological Service for an inspection for an export permit. He mentions that Van Loon afterwards approved the documentation (Archive Kora Kremer).

Kremer and Van Lier seemed to be very close. Correspondence between the two indicates that they both had some archaeological knowledge and they talked to each other about dates, style and find spots. When they returned to the Netherlands, they stored their objects together in the old concierge residence of the building that used to be the Nederlandsche Bank. They both concluded that this space was not

suited to be a museum for the public because it was impossible to properly safeguard the collection there. However, they did agree that it was suitable to be used for research purposes (RMO-archief: nr 06.04.02/15.02). Kremer and Van Lier wrote in a letters in 1969 about possible exhibitions in other countries. They were planning on Denmark first and perhaps Sweden next (RMO-archief: nr. 06.04.02/15.04).

In a letter to Van Lier in 1976, Kremer discussed the price of their collection. He wrote, 'In my opinion we must ask for a reasonable price for the objects that we acquired for a ridiculously low price, even with the additional charges from the archaeological service, customs etcetera, because if the price is too low we will get stuck with the 2nd and 3rd class objects' (Archive Kora Kremer). Thus, they wanted to sell the objects in such a way that they would be reasonably valued.

Kora Kremer feels an emotional and nostalgic connection to the her father's collection, including the objects and archives she still has at her house (figure 23). She and her brothers have memories of their father, including sometimes joining him on site visits, that contribute to this connection. Kora Kremer mentioned that there is one rule in the family, which is that no one can ever sell any object and that the collection must eventually end up in a museum. She is also aware of the reality that, in a museum, the collection would probably end up in a depot and that the collection does not have a high market value (Interview Kora Kremer, 17 April 2021).

Figure 23: A part of Kees Kremer's objects at Kora Kremer's house (photo by author)

5.3 Hillegonda Janssen

Ms. Hillegonda Janssen (1932–present) was interviewed by the author of this thesis on 29 March 2021**.** She had been interested in archaeological objects from a young age (Bosmans 2011, 9). She started to collect Iranian antiquities in the 1960s during her short stays in Teheran, where her husband was a pilot for KLM. Between 1973 and 1975, her husband was stationed for longer periods of three months in Teheran, and Hillegonda Janssen went to live there with him. Like many other woman during this time, she did not have a job herself but she did get out and wanted to explore Iran. She would often travel to Iran in order to find suitable objects for her collection. She mentioned that she had a lot of free time, since her husband was often away all over the world working for KLM (Terlouw 1997, 1). This meant that she was able to collect objects over a long period. She also had a friend who lived in Teheran, who also lived in Iran because of her husband's job, with whom she could stay. She studied archaeology for a short while but realised that she was not interested in this topic (Interview Hillegonda Janssen, 29-03-2021).

Figure 24: Ms Hillegonda Janssen with some objects from her collection at home in 2012 (Bosmans 2011, 10)

She started by collecting Luristan bronzes, then broadened her interest to pre-Islamic ceramics and eventually became interested in collecting Islamic ceramics. She did not have any particular reason for collecting Islamic ceramics, except for her appreciation of their aesthetics. She mentions that she did not only collect archaeological material, but also other beautiful objects because the quality was high and the prices were low. She took many objects from Iran as gifts for friends and acquaintances to share her love for this material. Many of them also asked for these objects because they were so impressed by the quality (Interview Hillegonda Janssen, 29-03-2021).

She acquired her objects by buying them in small shops, not bigger than closets or sometimes in basements. Most often these were tapestry shops that had some archaeological objects on the side. She mentioned that the trade in tapestry was extremely valuable on the international market. She got to know these 'tradesmen' well and they began to direct her to the best material (Interview Hillegonda Janssen, 29-03-2021). She knew nothing about the objects that she bought at first, no whether it be their original location or style, and had no certainty about their authenticity or date.

These 'tradesmen' always knew when she was back in Teheran and offered her new objects. She did not know how they knew exactly. Eventually they even contacted her in the Netherlands when they were in transit to other cities such as London or San Francisco. When the situation started to change in Teheran, these 'tradesmen' knew long before the revolution that they had to move. She said many of them moved to big cities such as London, Paris and San Francisco (Interview Hileagonda Janssen, 29-03-2021). From her account, it seems these 'tradesmen' who sold objects in little shops were not ignorant; they made enough money to travel, they knew where to find their customers, they knew where to find the objects and they were internationally orientated.

Besides acquiring objects in these shops, she also bought antiques in auction houses in London and Paris, where, in her opinion, there was more information available on the original location of these objects.

She contacted Hemelrijk, the director of the AP, whom she described as very enthusiastic and nice. She found out more about the authenticity of her objects with his help. Hemelrijk made a little hole inside the objects with a small bore and sent the samples to Oxford University. After a few weeks, Hillagonda-Janssen would receive news from Oxford regarding whether her objects were authentic. She mentions that few of the objects she had bought in the little shops turned out to be inauthentic. She said that slowly she learned more about determining authenticity herself (Interview: Hillegonda Janssen, 29-03-2021).

In the beginning, she bought Luristan Bronzes as well, although she already knew about the frequency of inauthentic Luristan material. The Luristan Bronzes were extremely expensive on the market. Some of her bronzes turned out to be inauthentic. She did not, however, collect many of them because she was mostly interested in ceramics.

She was also in communication with Professor Van den Berghe, whom she contacted herself. They spoke about 'possibilities' regarding her collection. He also invited her to join him on excavations in the Luristan area. Apart from an incidental visit to Susa, this was the only site she visited.

She knew Kremer and Van Lier through other contacts and saw them on some occasions. She did not know them necessarily because of their common interest in collecting, but because they were from the same social circle of Dutch people living in Iran. She did not talk with Kremer and Van Lier about

archaeology or collecting a great deal. The conversations were focused more on the changing situation in Iran.

Sometimes she would run into other people from the Netherlands in Teheran, such as Béatrice Jansen (1914–2008), the deputy director of the *Gemeentemuseum* in the Hague (1954-1979), who had come to Teheran to acquire objects for new exhibitions. Jansen travelled to Iran three times between 1968 and 1976 with the primary aim to acquire Islamic antiquities for the museum (Eliëns 1996, 134). Jansen mentioned in a meeting with the advisory board of the museum that she should return back soon because there are 'beautiful objects available in Teheran'. Some of the acquired objects were praised in an exhibition called *Aardewerk en glas uit Perzië* in 1971 to celebrate the 2,500th anniversary of the Persian Empire (Eliëns 1996, 134).

She did not have an official export permit for any of the objects in her collection. Because of her many trips to Iran, she did not export her whole collection at one time. She sent the objects with a moving company, which did not seem to cause any difficulties. It is unknown how many objects were exported at one time. She also took smaller objects back to the Netherlands with her when she flew back (Interview: Hillegonda Janssen, 29-03-2021).

One part of her collection never made it back to the Netherlands. That was when Khomeini was already in power. This part of her collection was stored at a moving company and there was correspondence between her and the company, but the collection never arrived in the Netherlands (Interview Hillegonda Janssen, 29-03-2021).

Her collection was more or less randomly formed, following Hillegonda Janssen's early passion for Iranian art and archaeology. As for the policy of acquisition, Hillegonda Janssen did not target a specific ceramic group, but was rather fascinated, in her own words, 'by everything that was beautiful' and 'in conformity with my financial means' (Plesa 2012, 44). A compromise between aesthetic qualities and budget directed the acquisitions, as she stated in a 2012 interview (Plesa 2012, 44).

When Hillegonda Janssen and her husband started to get older, they decided they wanted to donate a large portion their collection to a museum. They figured that, because they had no children, it would be sold through auction houses and they did not want the objects to be dispersed (Interview Hillegonda Janssen, 29-03-2021).

Hillegonda Janssen started to donate Islamic pieces to Princessehof through the Ottema-Kingma Stichting (OKS) in the 1990s. Larger donations of both Islamic and pre-Islamic pieces were made in 1997, 1999 and

2000, followed by several separate donations from 1999 to 2005. In 2001, her collection was exhibited at the Princessehof and was opened by the Iranian vice-ambassador Mohammed Khodadadi. In an article in the NRC newspaper in 2001, her collection is described as '*a unique collection of Persian ceramics for our country*' (NRC 28-05-2001).

Although the entire collection was officially donated to Princessehof Museum through OKS, it was agreed that Hillegonda Janssen would still keep a small number of pieces at her residence. A selection of her collection is exhibited in the permanent galleries of the Near East at the Princessehof.

5.4 Other collectors

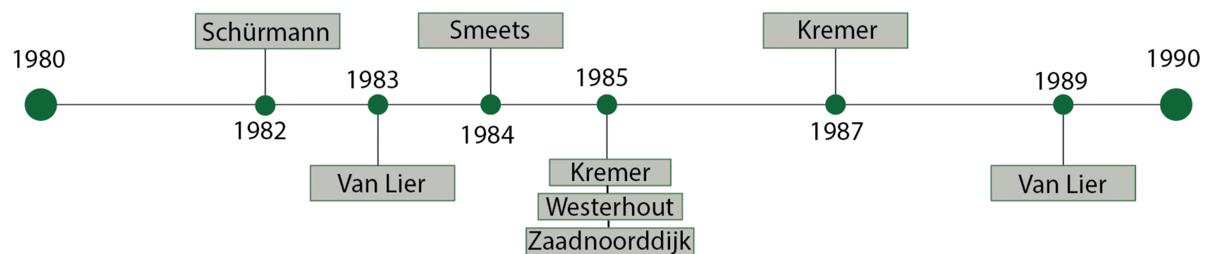


Figure 25: Collectors in order of date of acquisition of their collection by RMO

Four other collectors are described in this chapter ordered by date of acquisition of their collections by the RMO.

Schürmann

Dr Heinrich Moritz Emil Schürmann (1891–1979) was a German oil geologist. He was one of the only private collectors at the RMO who was not Dutch, although he worked for a Dutch company. He was described as 'a man with an impressive personality'. He worked as a geological expert for Shell and in 1930 he became head of the geology division at Shell in the Hague, where he remained until he retired in 1951 (www.drschurmann-fonds.nl).

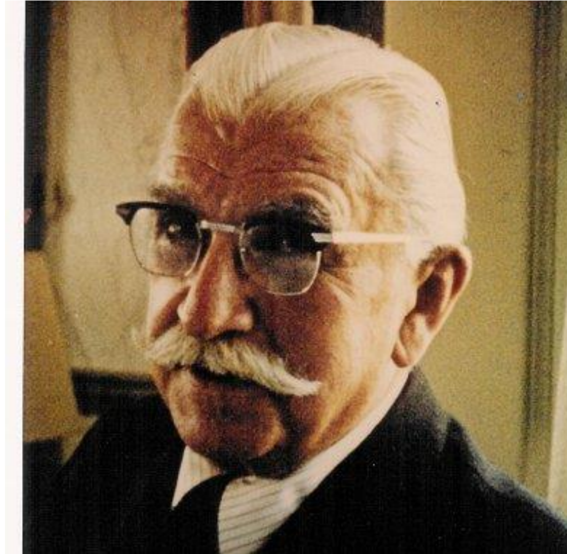


Figure 26: Dr Schürmann (www.dr-schurmannfonds.nl)

He left a part of his collection, consisting of 1,678 objects, as a bequest to the RMO in 1982. About 1,600 objects are Sassanian seals and are regarded as comprising one of the best private collections of seals in Europe. The second part of the collection consists of more than 70 gold and silver jewellery objects from the Amlash area (Van den Boorn 1983, 11). He was interested in many fields of earth sciences and eventually built up a collection of minerals, rocks, thin-sections, documents and archaeological material. In 1949, he founded the Dr Schürmann Fund to manage his collection. He bought objects during his visits to, among other places, Baghdad (Iraq) and during his travels in Iran. His collection is described as consisting of seals, gems, pendants, amulets, bullae and rings, mostly from the Sasanian period (ca. 250 AC– 642 AC). Photographs of the setup of the objects in Schürmann’s house were taken by Guido van den Boorn in October 1987 (figure 24).

Figure 27: The Schürmann collection, displayed at Schürmann's home. Photographs by Guido van den Boorn

Smeets

In 1968, Smeets, lived with his wife at the house of the Dutch scientist P.J. Slabbers, who worked for the United Nations at the Soil Institute and Associated Pilot Project in Marvdasht from 1966 to 1968 (Petit 2018, 432). Smeets picked up sherds and other loose items from the ground together with his wife on five hills in the neighbourhood of Marvdasht, a small village south-east of Persepolis. In 1984 the RMO obtained 24 objects, mainly sherds, from Smeets. The objects were interesting for the RMO, because most of the sherds can be dated to between 5000 and 2000 BC, based on Japanese research in the same area between 1956 and 1965 where similar objects were found (Petit 2018, 432; Egami et al. 1977). Because the RMO did not own many objects from this early period, it was a valuable addition to the Iran collection of the RMO. After his death his widow gave the collection to the *Gemeentemuseum* in Roermond, which later donated the objects to the RMO.

Zaadnoordijk

The collection of G.E. Zaadnoordijk was donated to the museum in 1984–1986. In total, he donated 61 objects, all ceramics. Most of his finds were from graves in north and northwest Iran, in particular from the region around Amlash. The provenance of the objects is not always clear, because Zaadnoorddijk was interested mainly in the aesthetics of the objects (Petit 2018, 432). Almost all the objects are complete and are characterised by harmonic shapes and red or black polish.

The objects are from Luristan, Susa, Giyan, Azerbedjan , Khurvin and Amlash. His collection is valuable to the RMO because the objects, in contrast to most other Iranian collections in the RMO, are from a more recent period: Achaemenid, Parthian and Sassanian (Petit 2018, 432). Some of the highlights of the collection, together with their prices ranging from 100 to 1500 guilder are listed in a document (RMO-archief: nr. B 1985/10.1-60).

Westerhout

The collection of AM Westerhout was donated to the museum in 1983, but was registered only in 1985. His collection consists of 345 objects: a large group of sherds, stone artefacts, fragmentary terracotta figurines and a hoard of bronze coins, most of which he had found on the surface when working on constructing sugar plantations. The market value of the collection was estimated at between 5,000 and 7,500 guilder. Only the terracotta figurines and coins had a market value (RMO inv.nr. 06.04.02/16.01). Most of his finds were from Tepe Haft and Tchoga Zanbil near Susa. In 1962, Westerhout was a civil engineer employed by the Dutch Sugar Company and was charged with the construction of a sugar cane plantation enclosure to the east of Haft Tepe (van den Boorn 1989, 2).

During this work he saw that the bulldozers started to uncover artefacts. Westerhout became interested and decided to look for surface finds. He noted down the precise locations of some objects on the working map of the construction project, effectively creating a provenance for them. Through this documentation, he noticed that most surface finds were located at the foot of small tells. As Professor Negahban would start scientific research several years later at Tepe Haft, the surface finds could be compared to the observations from the scientific excavations (Van den Boorn 1980, 1). From a scientific viewpoint, these finds were extremely useful since they were documented from a particular area east of Haft Tepe (Petit 2018, 432). Since there was a massive boom in agro-industrial operations in the 1960s in Iran, Westerhout's finds might also provide information that about artefacts that were subsequently lost due to the ongoing levelling and plantation activities (Van den Boorn 1989, 4)

Figure 28: Surface finds from Westerhout's collection (RMO 2020, inv nr B1985/1.77, B1985/1.120, B1985/1.69)

5.3 Summary of collectors

Three main collectors were described in this chapter: Van Lier, Kremer and Hillegonda Janssen. Besides them, four other collectors are described in less detail: Westerhout, Zaadnoorddijk, Schürmann and Smeets.

Most of them started collecting Iranian objects because they lived in Teheran because of their jobs (table 4). Two collectors, Kremer and Schürmann, worked for oil companies, Van Lier was an advisor for harbour facilities, Westerhout was an engineer for sugar plantations and Hillegonda Janssen's husband worked for KLM. The occupations of Zaadnoordijk and Smeets are not known.

Van Lier and Kremer had an interest in the archaeological context of objects. Especially Kremer had a particular interest in the archaeology of objects and wrote down his detailed observations. Both van Lier and Kremer had contact with archaeological professionals about their collections. Westerhout seemed to be inspired to pick up sherds randomly while he was doing his work in the field. Schürmann was mostly interested in geological material but also collected archaeological material. Hillegonda Janssen collected objects for aesthetic reasons but was also actively learnt more about the objects.

At least Kremer and Hillegonda Janssen bought objects in antiquity shops. Westerhout and Smeets seemed to only collect surface finds. Van Lier collected objects through a local who brought objects to him directly. Besides selling or donating objects to museums, it seems common that collectors gifted objects to friends and family and that some of them were sold through auction houses.

Van Lier had an official permit to export his collection. Kremer had an export permit as well, due to the assistance of Van Lier, although the permit has not been found. Hillegonda Janssen seems to have exported her objects without an export permit, but in small batches with the help of a moving company and during her personal flights. There is no information available on export permits from the remaining collectors.

Table 4: Main collectors with their method of acquisition and motive for collecting

Name	Job	Method of acquisition	Motive for acquisition
Van Lier	Advisor of harbour facilities in Teheran 1960–1962	Bought objects at local art markets from local suppliers Paid someone to bring objects to him directly	Lifelong Interest in ceramics Wanted to collect to organise exhibitions in Europe to present the culture of Iran Interested in archaeology as well
Kremer	Engineer at an American oil company Esso in Teheran 1957–1977	Visits to little villages Collecting antiquities at his visits to sites	Wanted to save objects from Sakkizabad from disappearance by looting Wanted to organise several exhibitions in Europe. Wanted to publish an article on the archaeological context of finds in Sakkizabad with Prof Neghaban
Hillegonda Janssen	No job, husband was pilot for KLM 1973–1 975 (and many other travels)	Antique markets in Iran, London and Paris	Love for archaeology and the aesthetics of Luristan bronzes, pre-Islamic ceramics and Islamic ceramics
Smeets	Was a guest of scientist Slabbers	Picked up loose objects from the surface during walks with his wife	Accidental discoveries
Zaadnoordijk	? via E.P. van Dijk		Love for aesthetics of the ceramics
Westerhout	Engineer who built sugar plantations	Found objects on the surface while constructing sugar plantations	Coincidental
Schürmann	Geological advisor Shell 1930-1951		Special interest in seals

6. Discussion

6.1 Dutch collections within the Iranian context from a postcolonial perspective

Postcolonial theory suggests that the discipline of archaeology cannot be understood independently of its context. This theory is confirmed by this research, since the socio-political history of Iran is undoubtedly connected to the history of the development of archaeology in Iran and vice-versa. The influences that foreign countries have had in Iranian politics and policymaking have led to the establishment of a Western constructed 1930 Antiquities Law that was in force for decades. An increase in excavations and the trade of Iranian antiquities coincided with the occurrence of open international relations under the reign of Mohammed Shah. Moro-Abadia (2006) suggests that power cannot be completely characterised only by political control. This is also the case for the Iranian situation, a country that has never officially been colonised, where we see that 'power is often maintained through hegemony or consent by ruling groups and the convincing of the belief that their interests are the common interests of the society' (Moro-Abadia 2006, 7).

The Dutch engagements fit into the Iranian context of open relations, as we see an increase in Dutch activities in Iran during the second half of the 20th century until the Iranian Revolution in 1979. The time that most Dutch collectors were actively collecting in Iran was in the 1960s and 1970s. It makes sense that the Shah's regime would not mind a relatively open trade in antiquities and would also encourage international exhibitions of archaeological collections for the bilateral diplomatic and cultural ties such exhibitions could promote.

Most of the Dutch collectors were able to easily purchase all these objects through antiquities markets or shops, commercial excavations and by collecting surface finds. These three ways of acquiring objects can be analysed on whether the objects were looted or not, following the definition of looting as provided by Bowman Proulx (2016): 'the illegal removal of culturally significant material from archaeological sites'.

Firstly, it is almost impossible to know for sure whether the Dutch collectors' objects were looted or not if they were bought at a shop or market. This complicates the provenance of the objects and reminds us of the term 'grey market', as coined by Mackenzie and Yates (2016). We know at least from Hillegonda Janssen (2021) that no information on the objects was provided at the shops and no questions were asked.

Commercial excavations are also tricky to analyse, since they were legal but we also know from Negahban's accounts that virtually no control was exercised over them and the unrealistic number of 96% of the certificates stating that no antiquities had been found is highly questionable. This unrealistic number is probably due to the fact that half of the finds from these excavations should have been kept by the government. This means that although the commercial excavations were legal, the legal conditions

were probably often not followed. Even if the conditions were followed, an object from a commercial excavation that has an official provenance stating the actual find spot, which was often not the case, still suffers from a loss of archaeological context since there was no scientific excavation before the object was extracted from the ground. We know at least from Negahban (1996) that he described the commercial excavations as 'illegal digging and causing the illicit trafficking of antiquities out of Iran' (Negahban 1996). This statement suggests that in his opinion the circumstances were so bad that he viewed commercial excavations as looting.

From correspondence and interviews, it appears that at least some collectors were not fully unaware of the importance of provenance and the legal implications of acquisition. It was, however, a chaotic situation and Kremer and Van Lier mentioned that they often thought that Iranian officials were slow and did not even care about their cultural heritage. The general mind-set of some the collectors was that they needed to save the antiquities from looting before it was too late.

Kremer and Van Lier did acknowledge the importance of archaeological context and thought the objects should be publicised and displayed at foreign museums instead of being looted. This archaeological awareness was relatively unique for that time and the detailed notes that some collectors made contributed to a large body of archaeological knowledge on Iran that otherwise might not exist. Kremer, in particular, made archaeological notes of the stratigraphy of the mounds in which objects were found, although he was not an archaeologist and had no archaeological education.

The main thing that the collectors did not seem to consider was the idea that, by buying and selling their objects, they could indirectly encourage more looting. It is evident that not all objects went to museums or remained in private collections, but that some of them were also sold as commercial objects of value at auction houses such as Sotheby's, or were gifted or sold to at least some private individuals. On more than one occasion, remarks were made by collectors about the dire looting situation, without acknowledging any link between the looting and their own collecting. The argument of demand and supply is nowadays relatively common in the archaeological academic world, yet did not exist at all during the 1960s and 1970s. It was therefore not surprising that the collectors did not think about the potential consequences of their collecting.

The way that scholars contributed to the antiquities trade by publishing unprovenanced objects could also have led to an increase in the value of, and demand for, these objects. We see this, for example, with Professor Van den Berghe and thesis student Van Geert on the Sakkizabad collection. This is an unfortunate example of scholars becoming unintentionally and indirectly involved with the commerce of antiquities by the use of their scholarly work that could be used as a means of marketing (Brodie 2019, 8). The publication of potentially looted antiquities in scholarly journals is nowadays considered to be dubious at best and highly professionally unethical at worst (Yates 2015, 75).

6.2 Dutch collections in a legal framework

The archaeological situation in Iran was unique compared to other countries because of the existence of commercial excavations that legally enabled excavations for commercial profit. The permission for commercial excavations lasted for decades, from 1930 to 1980. We know from accounts of insiders such as Dr Negahban that commercial excavations were often not controlled at all and many objects were not registered.

Article 51 of the 1930 Antiquity Law clearly states that export is forbidden unless someone has obtained a licence from a government official. With the Maleki vs. Iran case, we observed that the lack of this export permit eventually led to the restitution of the collection. It was not necessarily the way that she obtained the objects that was or could be used as an argument, since commercial excavations were legal at the time. At first, in 1982, when Iran tried to claim ownership of the objects, it turned out to be too difficult to disprove Maleki's ownership. In 2012, when the case was reopened, the strategy shifted from proving illegal ownership to proving illegal export. Iran won the case on those grounds.

The Maleki case can be compared to the three main collectors of this thesis. We know that Van Lier obtained an export permit for his collection. It took a long time for it to be approved, but in the end he got to export almost all of his objects, even to his own surprise. This could be the case because he had been given the status of 'collector' by the Iranian government and because he himself worked for the Persian government. It might have been different if Van Lier had not had some important governmental connections and connections with important Iranian archaeologists, some of whom were in the approval of antiquities commission.

Hillegonda Janssen's export permit has not been found. Hillegonda Janssen went on many short trips to Iran and she explained that she exported the objects separately. Since Van Lier mentioned that it was possible to export five to six objects without a permit, this seems plausible. However, this rule that Van Lier mentions is not included in the 1930 Antiquities Law, so it is uncertain where he got this information from.

We know from Van den Boorn (2021) that Kremer had an export permit and that he saw the documentation at Kremer's house. Van Lier assisted Kremer to obtain an export permit, which could have contributed to the fact that he was also recognised as an official 'collector'. The official permit has not been located. The only information available about the permit is that, after Professor Van Loon had some concerns about legality, he showed him 'some objects, a copy of his official permit as a collector of the Archaeological Service (…) and letters of correspondence with 'Asia Travel' about the transfer to the Archaeological Service for an inspection for an export permit' (Archive Kora Kremer).

Apparently, it was not necessarily easy to obtain a permit, since Ms Maleki had to export her collection with the assistance of a diplomat.

In the same year that Iran asked for the return of the Maleki collection from Belgium (1982), Van den Boorn was in contact with both Van Lier and Kremer to arrange the transfer of their collections to the RMO. Van den Boorn had not known about the claim until now and was surprised about it, but he also mentions that he believes that Kremer and Van Lier must have known about it, since private collectors were in contact with each other all the time. However, no correspondence between collectors in which they mention the Maleki claim or other claims has been found.

Returning to the 1968 penal law, which shows differing penalties for differing offences regarding heritage, there is another consideration to be made. Although the penalty of one to three years imprisonment is the same for looting as for exporting objects without a licence, one can imagine that the locals, who were the ones who often looted sites for foreign collectors, were at higher risk than the collectors who ended up with the antiquities. We see from the Maleki case that it was extremely difficult to prove illegal acquisition or export; the latter took Iran more than 30 years to prove, while it was not difficult for the collectors to obtain their antiquities in the first place. In contrast, a local could be caught looting, which would be direct evidence that they 'deserved' such a penalty. Van Lier stated that locals 'did not want to get caught with antiquities on their way to Teheran', suggesting there was indeed a reasonable risk associated with looting and that apparently at least some collectors and locals were aware of the illegality of their practices.

Farokhi Eisvandh (2018) argues that looting is often a form of 'subsistence digging' in poorer countries. A form of subsistence digging was probably the case for many Iranians as well, because Van Lier and Hillegonda Janssen both described the villages that they visited as extremely poor. The motive of looting for survival is in stark contrast to the collectors' motives, while they risked less.

It would, however, perhaps be short-sighted to assume a simple distinction between '*poor*' local looters and '*rich*' Western buyers. From a postcolonial perspective, it is important to resist creating dichotomies and rather to view power relations as fluid, in that they can vary between locals and incomers (Gosden 2012, 256). As Hillegonda Janssen (2021) explained, the Iranian tradesmen from whom she bought objects were not passive sellers, but knew how to find their customers and how to offer the best material. Moreover, they travelled internationally and after the revolution often ended up in major cities such as London, San Francisco and Paris. It would perhaps be too simple to state that only 'Western' people made a lot of money from the trade in Iranian Antiquities.

As with the Maleki case, we see that the return of archaeological objects in general often depends on the concept of ownership and the laws of the country from which the object derives or is situated (Campfens 2020, 257). Instead of using only Ownership Title, Campfens (2020) proposes the introduction of a Heritage Title to prove a continuing cultural link that still exists after an object comes to be owned by a

new possessor. With the use of such a Heritage Title, human rights laws could inform claims for return in order to look beyond the limited concept of ownership (Campfens 2020, 257). Vrdoljak (2008) proposes a framework that delineates three principle rationales for assessing the return of objects. The first is premised on the principle of territoriality and the link between people, land and cultural objects. The second is based on righting international wrongs and the last on the principle of self-determination and reconciliation (Vrodljak 2008, 2-3).

As for the Iranian-Dutch objects, instead of looking at legal questions of ownership and export permits, it would also be a possibility to look beyond that by considering the heritage value for the communities associated to those objects in Iran. The question is whether there is a need for the return of the objects discussed in this thesis and what kind of continuing cultural link still exists. The postcolonial background of the acquiring of these objects should, in my opinion, always be an ethical argument that should at least be considered. As can be observed with the collectors and their collections, as described in this thesis, every case is different and should be handled in a unique manner.

7 Conclusion

This thesis focussed on the provenance and context of Iranian antiquities in the Netherlands in the second half of the 20th century. There are three museums in the Netherlands that have collections of Iranian antiquities: The RMO in Leiden has about 3,700 objects, the AP in Amsterdam owns 95 objects and the Keramiekmuseum Princessehof in Leeuwarden has 335 objects. The collections are regarded as among the most important Iranian collections in Europe (Petit 2018). The objects analysed in this research are the ones that ended up in museums, although is it extremely likely that there are many more objects in private collections. The Iranian collections in Dutch museums are distinctive because most of the objects were derived from private collectors and acquired relatively late in the 1980s, and almost none of them were derived from scientific excavations (van den Boorn 1983, 9).

The two primary research questions: *What was the context of collecting antiquities in Iran in the second half of the 20th century?* and *what role did the Netherlands play within this context?,* have been answered in the course of this thesis. Both questions have two sub-questions attached to them and the answers to these are summarised below.

1. What was the context of collecting antiquities in Iran in the second half of the 20th century?

1.1 What was the socio-political landscape in Iran that made it possible to collect these objects?

The context of collecting Iranian antiquities is related to the close relations with foreign countries in Iran for at least over the last two centuries. This started already in the 19th century when the Iranian ruling class showed the readiness to grant rights to foreign countries to exploit the country's resources. This was often also the case in relation to collecting antiquities and archaeology. First, the French obtained an official monopoly over all archaeological excavations in Iran in 1900. Secondly, the legislation of Iran played a significant factor.

The 1930 Antiquities Law was set up by a foreigner, the German Ernst Herzfeld in response to the monopoly of the French over archaeology in Iran. The law was criticised as a type of policymaking that appeared to favour national interests that had been borrowed from European countries, which meant it often failed to mitigate problems and fell into conflict with Iranian social mores (Hodjat 1995, 175). Most importantly, there was no justification for or a relationship between these new 'Western' laws and the beliefs and the values of the Islamic society (Hodjat 1995, 118). This law included permission to hold, in practice extremely unorganised and unsupervised, commercial excavations, which led to a great deal of looting for decades. The commercial excavations made it very easy for looters to sell and for collectors to obtain objects on the antiquities market.

From 1940 onwards, the open relations under the reign of Mohammad Reza Pahlavi (1941 to 1979) resulted in a shift towards Westernisation, in which the values and ideas of foreign countries came to be infused into Iranian society.

1.2 *What kind of legislation on cultural heritage existed during the second half of the 20th century?*

The 1930 National Monument Preservation Act was the first and only law to protect national heritage for decades. In 1968, the Repeated Article 127 of the General Penal Code was the only criminal law that concerned the protection of cultural heritage. The Code was in force until 1978 (Samadi 2003, 182). Article 51 of the 1930 Antiquities Law states that the export of antiquities without a licence is forbidden. The Maleki case demonstrated that the absence of an export permit was reason to return a collection to Iran.

On an international level, there were two main treaties that provided a framework for approaches to regulation of the antiquities market of which the 1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property is the most important for this thesis. Iran ratified the Convention in 1975 and the Netherlands only in 2009.

2. What role did the Netherlands play within this context?

The Netherlands played a role within the archaeological context of Iran, since many Dutch companies and their employees resided in Iran mainly due to the oil industry and dredging companies. During the same time, some of the employees of these companies started collecting antiquities (Petit 2018, 429).

2.1 How did museums acquire these objects?

Although this thesis covered three museums, the decision was made to only analyse the acquisition policy of the RMO since it owns the largest Iranian collection. After the formulation of the 1970 convention, the ethics regarding acquiring antiquities slowly started to change. However, it took a long time before museums introduced codes of ethics and revised their acquisitions policies since it also took a long time before countries actually implemented the 1970 convention. Like many other museums, it took nearly 25 years from the drawing up of the convention before the first policy related to acquiring objects was introduced by the RMO, namely in 1994. The increase in the museum's collection of Iranian objects in the 1980s was partially due to van den Boorn's arrival at the RMO in 1980 as the first curator of Near Eastern Archaeology, because he actively pursued Iranian collections. The decision by collectors to donate or sell their collections could also be partially related to the changing political situation in Iran in the years leading up to the Iranian revolution in 1979 when many collectors returned to the Netherlands.

2.2 *How and why were the objects collected by Dutch collectors?*

Three primary collectors were described above: Jacob van Lier, Kees Kremer and Hillegonda Janssen, because of the quality of their collections and the information available on them. The following collectors were also described to a lesser extent: Smeets, Westerhout, Schürmann and Zaadnoordijk.

The objects were collected in Iran since many objects of museum quality were available at markets and shops at low prices, surface finds were collected during work activities and commercial excavations occurred in many places. A lack of proper legislation created the ideal circumstances for collectors, partially thanks to commercial excavations that, although they were officially registered, seemed to lean more towards looting than actual archaeological excavations. For these reasons, it was commonplace for foreigners to be confronted with archaeological objects and to become interested in collecting.

The main motivation of Kremer seemed to have been the archaeological value and the intent to display them in Western museums. Not all objects had a high market value, as we saw for instance with Kremer's objects that were not sold through Sotheby's. Van Lier seemed to be interested a bit in archaeological value and the display in museums but also in the market value of the objects. Hillegonda Janssen was mainly interested in the aesthetics of the objects. As Westerhout made detailed notes on the locations of his sherds, it seems that he had an archaeological reason for doing so.

Only one official export permit was found, namely that of Van Lier, although Kremer purportedly also had one. Taking all collectors' motivations into account, it does not seem there is a general pattern of collecting Iranian antiquities, however especially Kremer's detailed documentations are relatively unique for a collector without an archaeological background.

The future of the objects

My recommendation after researching the context and provenance of the Iranian collections in Dutch museums would be to incorporate perspectives of Iranian museum professionals, scholars, government officials or other actors. Without such perspectives one cannot decide what to do with the objects. I would be curious to learn how these objects are valued by Iranians but also if the display of these objects makes people uncomfortable when learning more about the context, and if so, for what specific reasons.

Both Lucas Petit (2021) and Kora Kremer (2021) suggest that there is at least not a high market demand for most of the Iranian objects. A suggestion would be to analyse the online market demand for such objects, since this emerging market has enabled lower value objects to be easily distributed to a broader geographically distant and socio-economic public (Brodie 2015, 11).

Throughout this thesis I was mainly surprised by the fact that a lot of the data has not yet been researched to a great extent. The responses I received from museums or individuals were often that no one had looked into the background of these objects. There is still much that can be researched about the acquiring context of objects. I believe such research is very relevant to understand the complexities of the

past of acquiring objects and can hopefully provide one with an informative and nuanced understanding of the issues related to it. This could not only be very informative to incorporate within a museum's education program but also for researchers or other actors outside of the museum. This starts with introducing a complete digital database of all objects, which not every museum currently has, and could be supplemented with as much information as possible on provenance and context research. Not only is this useful for potential claims of objects but also for enabling more research. For instance, it turned out to be quite difficult to find more information on related Iranian objects in other (international) museums on their websites and some unfortunately also did not respond to emails.

Besides the Iranian perspective and general research into the provenance and context of objects, there are other possibilities for subsequent research resulting from this research. For instance, the Maleki case could be researched in relation to other Iranian collections since there are no publications or articles available yet. The political reasons for deciding to file a lawsuit for the return of the Maleki collection and for continuing for over 30 years could also be assessed.

Kremer's archives and detailed notes could be researched and published since this has never been done before, however there are of course potential problems associated with publishing objects that are not derived from legal excavations, as mentioned in the discussion.

My understanding is that it would cost a lot of time and money for museums to tackle all of their collections, however in the end it will help a museum to be more transparent about their objects and to add an extra layer of depth in a time when the call for decolonisation of museums is only becoming louder.

Abstract

This thesis focuses on the provenance and context of Iranian antiquities in Dutch museums acquired during the second half of the 20th century. The museums that acquired Iranian antiquities are the Rijksmuseum van Oudheden (RMO), the Allard Pierson (AP) and the Keramiekmuseum Princessehof. The historical context of archaeology in Iran, including its legislation, is explored so that the acquiring of objects by Dutch private collectors can be understood. This research shows that archaeology and antiquities collecting in Iran are closely linked to the socio-political developments and influences of foreign countries in Iran that are related to post colonialism. The 1930 Antiquities Law was the first law that was enacted to protect the archaeological heritage and has lasted for decades. It was set up by a foreigner and the law was criticised as a type of policymaking that appeared to favour national interests that had been borrowed from European countries, which meant it often failed to mitigate problems and fell into conflict with Iranian social mores. Furthermore, the law enabled commercial excavations that were often not controlled at all which meant that, although the commercial excavations were legal, they seem to lean more towards looting. From archives and interviews, the accounts of Dutch private collectors are also taken into consideration. Many foreigners lived in Iran in the 20th century up until the Iranian Revolution in 1979 and the circumstances mentioned above made it very easy to collect antiquities. As for the provenance, it has appeared difficult to assess if the Iranian objects have been looted or not and, for some, also if they have been illegally or legally exported. Although there are some detailed accounts of find spots, the reality is that none of the objects are derived from scientific excavations.

Samenvatting

In deze scriptie is de context en provenance onderzocht van Iraanse archeologische objecten in Nederlandse musea die verkregen zijn in de tweede helft van de 20ste eeuw. De musea die deze objecten hebben aangekocht zijn het Rijksmuseum van Oudheden (RMO), het Allard Pierson (AP) en het het Keramiekmuseum Princessehof. De historische context van archeologie in Iran, waaronder de wetgeving, is onderzocht zodat het verkrijgen van objecten door Nederlandse verzamelaars in deze tijd in de Iraanse context geplaatst kan worden. De resultaten uit dit onderzoek laten zien dat archeologie en het verzamelen van objecten nauw verbonden zijn met de socio-politieke ontwikkelingen en buitenlandse invloeden in Iran die gerelateerd zijn aan *postcolonialism*. De *1930 Antiquities Law* was de eerste wet die het archeologische erfgoed in Iran zou moeten beschermen. Deze wet heeft tientallen jaren stand gehouden en was opgezet door een buitenlander. Er was kritiek op de wet aangezien het leek op een westerse wetgeving waarbij er een voorkeur was voor nationale belangen die geleend waren van Europese landen. Hierdoor lukte het vaak niet om met deze wet problemen op te lossen of te voorkomen en was er frictie tussen deze manier van westerse wetgeving en Iraanse sociale mores. Daarnaast werden commerciële opgravingen geïntroduceerd in deze wet die vaak niet streng gecontroleerd waren. Deze opgravingen waren wel legaal maar leken hierdoor meer op *looting* doordat regels vaak niet nageleefd werden. Door middel van interviews en archiefonderzoek zijn ook de verhalen van Nederlandse privéverzamelaars meegenomen. Veel buitenlanders leefden in Iran in de 2e helft van de 20ste eeuw tot de Iraanse Revolutie in 1979 en de omstandigheden maakten het erg makkelijk om objecten aan te kopen. Als we kijken naar de provenance van de objecten van Nederlandse verzamelaars is de conclusie dat het erg lastig blijkt om te zeggen of de objecten gestolen zijn of niet, en voor sommige objecten of ze legaal of illegaal geëxporteerd zijn. Hoewel er gedetailleerde aantekeningen zijn over de vindplaatsen van de objecten, blijft de realiteit dat geen van de objecten afkomstig zijn van archeologische opgravingen.

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Appendices

1. List of interview questions

Van den Boorn (28 March 2021)

1. When did you work at the RMO?
2. How did you came to work at the RMO?
3. What was your job description?
4. What was the atmosphere like in the museum when you arrived there?
5. Were you in contact with other collectors such as van Lier and Kremer?
6. Did you know about the Maleki case?
7. Do you know how van Lier and Kremer exported their collection?
8. Do you know more about the correspondence between Sotheby's and the RMO?
9. Do you have more information on other collectors?
10. Was anything ever published on this subject?

Hillegonda-Janssen (23 March 2021)

1. Why did you live in Iran?
2. Why did you start collecting?
3. How did you collect all your objects?
4. Why did you start collecting Islamic objects instead of pre-islamic?
5. Did you collect Luristan Bronzes?
6. Were you aware of the large amount of fake Luristan Bronzes?
7. What information did you have on objects before you bought them?
8. How did you know if an objects was fake or not?
9. How did you export your collection?
10. Why did you donate your collection to the Princessehof?
11. Who were the people that you bought these objects from?
12. How did these people operate?
13. Did you ever go on site visits?
14. Did women often collect objects?
15. Were friends interested in your objects?
16. What is your date of birth?
17. How did Teheran change over the years?

18. Did you know van Lier and Kremer?
19. What kind of contact did you have with other collectors?

Kora Kremer on (12 September 2020 and 17 April 2021)

1. Who was your father?
2. What was Kremer's date of birth?
3. Why did Kremer live in Iran?
4. What was Kremer's job description?
5. How did Kremer start collecting?
6. Why did Kremer collect?
7. How did Kremer export all of his objects?
8. How close was Kremer with van Lier?
9. Do you have any archives from your father?
10. With whom was your father into contact with?
11. Do you have any photos from your father?
12. Did you our your brothers go on site visits?
13. On what kind of site visits did your father go?
14. What was the atmosphere like in Teheran and Iran?
15. Was there a close community?
16. Did your father sell objects to other people?
17. What objects do you still have in your possession?
18. What do you want to do with all the objects?