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Principles of Publication

At a time when U.S. ambitions for a unipolar world order have lost their appeal, a new order is taking shape thanks to the multipolarization of world politics and the acceleration of cooperation between developing countries, rejecting the globalism of imperialist states. Under these conditions, the new agenda of global cooperation should respond to the needs and aspirations of developing countries seeking joint development and solidarity under the guidance of public-driven projects. In particular, the Belt and Road Initiative (BRI) -put forward in 2013 by Xi Jinping, President of the People's Republic of China- provides a suitable opportunity and a sound foundation for the implementation of this new agenda of global cooperation.

BRI is an epoch-making move to re-implement the concept of the Silk Road, which dates back 2,000 years, to a time when China was immensely contributing to global prosperity and the development of trade and cooperation. The revival of this concept entails a much more comprehensive approach that also incorporates rail and sea transport, and digital systems.

BRI proposes to bring together over 60 countries across Asia, Europe, Africa, and Latin America –together accounting for nearly half of the world's gross domestic product– for prosperity and development at the initiative of China. Unlike the Western-centered world order, BRI seeks peaceful collaboration for improving global trade and production towards common goals for humanity. It firmly rejects crude imperialist exploitation. Two thousand years ago, the Silk Road was a conduit for the flow of gunpowder, spices, silk, compasses and paper to the world. Today, it offers artificial intelligence, quantum computers, new energy and material technologies, and space-age visions to developing countries. In addition, the New Silk Road provides incentives and opportunities for the development and implementation of bio-economic schemes in stakeholder countries against the threat of climate change and other environmental threats that bring the entire ecosystem to the brink of extinction.

Türkiye has a significant role –real and potential– in accelerating South-South cooperation. Türkiye is conveniently located as Asia's farthest outpost to the West. It assumes a critical position as a pivotal country on BRI's North-South and East-West axes. However, China's development and BRI's contribution to the future of humanity have remained to a large extent underrecognized and superficially evaluated in Turkish academia, media, and politics. This is mainly because Türkiye's academics, media professionals, and policy makers have been observing China using Western sources. In the same manner, China and BRI's other potential partners have been viewing Türkiye through a Western lens.

BRIQ has committed itself to developing an in-depth understanding of the present era, with a particular emphasis on the new opportunities and obstacles on the road to the New Asian Century.

BRIQ assumes the task of providing direct exchange of views and information among Chinese and Turkish academics, intellectuals, and policy makers. In the meantime, this journal will serve as a platform to bring together the intellectual accumulation of the whole world, especially developing countries, on the basis of the Belt and Road Initiative, which presents a historic opportunity for the common future of humanity.

BRIQ is also devoted to publishing research and other intellectual contributions that underline the transformative power of public-driven economies, where popular interests are upheld as the basic principle, ahead of individual profit. The fundamental tasks of BRIQ are to demonstrate how BRI can contribute to the implementation of this public-driven model, and to help potential BRI partners -including Türkiye- to realize their real potential.

BRIQ stands for the unity of humanity and a fair world order. It will therefore be a publication for the world's distinguished intellectuals, especially those from Eurasia, Africa, and the Americas: the defenders of a new civilization rising from Asia on the basis of peace, fraternity, cooperation, prosperity, social benefit and common development.

Submission Guidelines

BRIQ features a broad range of content, from academic articles to book reviews, review essays, interviews, news reports, and feature articles.

The Editorial Board can issue calls for papers for special issues and invite authors to contribute manuscripts; however, it also welcomes unsolicited submissions.

Submissions are invited in English or Turkish. All submissions are to include a short biography (150-word limit) and should be sent as Microsoft Word attachments to briq@briqjournal.com Articles or other content that have been previously published or are under review by other journals will not be considered for publication.

BRIQ follows American Psychological Association (APA style, 7th edition, <https://www.apastyle.org>) and uses American English spelling.

BRIQ applies a double-blind review process for all academic articles.

Academic articles should be between 5000 and 9000 words in length, including abstracts, notes, references, and all other content. Please supply a cover page that includes complete author information, and a fully anonymized manuscript that also contains an abstract (200-word limit) and five keywords.

Book reviews should not exceed 1,000 words; review essays covering two or more works can be up to 3,000 words.

News reports consisting of brief analyses of news developments should not exceed 1,500 words; feature articles combining reporting and analysis can be up to 3,500 words.

Please contact the Editorial Board for interview proposals.

EDITORIAL

The Plunder of Cultural Heritage and Imperialist Hegemony

The removal of cultural heritage, the tangible carrier of civilizations built by humanity over generations, from its places of origin is not merely a crime, but one of the most striking manifestations of injustice in the international system. The theft and transfer of cultural assets to distant centers acquired a systematic character, particularly during the colonial period. Conducted under the rhetoric of “discovery,” “protection,” and “science,” this process in reality constituted the cultural dimension of imperial domination. Such plunder represents not only a physical displacement but also a rewriting of history itself. By severing the oppressed world from its own past, a Western-centric historical narrative has been constructed, along with the fallacy of “civilizational superiority.”

Today, museums in Western capitals house hundreds of thousands of artifacts removed from Asia, Africa, South America, and other parts of the world. At the same time, a significant portion of cultural objects looted from the developing world circulates through auction houses at exorbitant prices or remains in private collections. With the expansion of the global art market, these flows have become increasingly complex, giving rise to multi-layered trafficking networks extending from local excavations to international galleries. Within this chain, artifacts are laundered into the legal market through fabricated provenance records.

In the post-Cold War period, and especially over the past two decades, the looting of cultural heritage has gained renewed momentum. The U.S. invasions of Afghanistan and Iraq, along with the post-2011 operations aimed at fragmenting Syria, have clearly demonstrated the devastating impact of imperial interventions on cultural assets. In conditions of political instability and armed conflict, the increase in illicit excavations not only feeds global markets but also provides a significant source of financing for terrorist organizations and organized crime networks. Available estimates suggest that the annual scale of this illicit trade ranges from hundreds of millions to several billion dollars.

In this context, the protection and restitution of cultural property are not merely matters of cultural policy for developing countries, but also of sovereignty and historical justice. Restitution processes go beyond symbolic acts of redress and are critical for rebuilding trust within the international system. However, existing legal frameworks and international conventions remain insufficient.

Ultimately, the looting of cultural heritage constitutes a threat to the shared memory of humanity. It must therefore be addressed not as the responsibility of individual states alone, but as a collective responsibility of all countries. At the same time, given that this plunder disproportionately targets the developing world while the artifacts are largely concentrated in imperial centers, cooperation among developing countries will be decisive in strengthening this struggle. Efforts to protect and reclaim cultural property are not only about preserving the past, but also about contributing to the construction of a more just, balanced, and multilateral international order.

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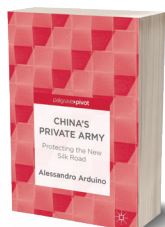
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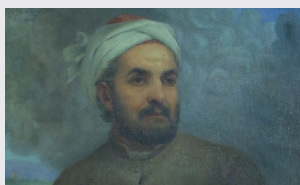
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From Cultural Erasure to Historical Recovery: Nishio Kanji and the ‘Burned Books’ of American-Occupied Japan



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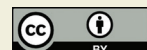
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ABSTRACT

The “plundering of cultural heritage in developing nations” need not be strictly limited to physical culture. Moreover, nations not now categorized as “developing” can also have been victims of cultural plunder. In this paper, I introduce the funsho (burned books) that American occupation authorities ordered removed from physical collections and from historical and cultural memory in occupied Japan after the Second World War. This paper explores how the historical and cultural consequences of this erasure connect the tactic to other episodes of American domination in different regions. It describes the efforts of Japanese scholars, including historian Nishio Kanji and other public intellectuals, to recover the funsho to counter the American Occupation’s attempts at historical blackout, thereby reclaiming a non-Western-centric, accurate history of not only America in Asia but also of American actions within the United States.

Keywords: American Occupation of Japan, funsho (burned books), General Headquarters (GHQ), Nishio Kanji, Supreme Commander for the Allied Powers (SCAP).

Introduction

THE “PLUNDERING OF CULTURAL HERITAGE in developing nations” calls to mind, quite rightly, the West’s centuries of looting physical cultural properties from countries which, due in large part to that looting, remain economically behind Western Europe and North America. The

physical devastation of non-Western countries, including the theft and destruction of cultural property, has also contributed enormously to disparities in wealth and health indices between the West and the regions of the world that the West has ransacked. India, Venezuela, Iran, Vietnam, and the Congo are just a handful of examples.

However, it is important to remember that the “plundering of cultural heritage” can be more than physical. It can be both spiritual and intellectual. The “cultural heritage” that the West steals or obliterates does damage that goes far beyond the physical loss of that heritage. To lose one’s cultural property is to lose one’s sense of pride, one’s sense of ownership of a common past, one’s sense of place in a (until recently, and still to a large extent) Western-dominated world. In that sense, perhaps the loss of written records

can be even more traumatic than the loss of cultural heritage from a temple, shrine, palace, or sacred burial site. Perhaps the willful erasure by Western actors of a country’s or a people’s written connection to history can be not just harmful but fatal for a collective identity, a culture living on in the present (Trouillot, 1995). The confiscation, concealment, destruction, or otherwise removal of an archival record from a nation can have consequences much worse than even the loss of a treasured cultural relic can inflict.



A scene from the period of the American attack on Okinawa, Iheya, July 17, 1945
(Photo: Okinawa Prefectural Archives, n.d.)

Also, the “plundering of cultural heritage” can take place in nations that are not commonly considered today to be “developing.”

The “cultural heritage” that the West steals or obliterates does damage that goes far beyond the physical loss of that heritage. To lose one’s cultural property is to lose one’s sense of pride, one’s sense of ownership of a common past, one’s sense of place in a (until recently, and still to a large extent) Western-dominated world. In that sense, perhaps the loss of written records can be even more traumatic than the loss of cultural heritage from a temple, shrine, palace, or sacred burial site.

In this essay, I present a little-known but highly significant incident of sustained cultural heritage plundering by a Western country. The place of plunder was Japan, which today ranks among the five most powerful economies in the world. In 1945, however, the country of Japan lay in economic and physical ruin, the victim of an indiscriminate bombing campaign by the United States targeting mainly defenseless civilians. Following Japan’s defeat in the Greater East Asia War in August of 1945, the Americans began an occupation of the country that included an extensive and highly effective regime of censorship of the press, textbooks, and already-published works. While

the Japanese Empire had engaged in censorship at home and abroad before 1945, the scope and aim of the American censorship regime were different. The goal appears to have been the psychological dismantling, or “disarmament,” of a fierce erstwhile enemy (Aoyagi, 2017). The American occupation authorities, seeking to dismantle Japan psychologically, confiscated copies of more than seven thousand book titles, a group of works known today by the name historian Nishio Kanji gave to them: *funsho* (焚書), or “burned books.”¹

Nishio explicitly draws on this history in his framing of the *funsho* of postwar Japan. These “burned” (in reality, confiscated) books represent a nearly-lost legacy of cultural achievement in Japan. However, efforts by a few Japanese scholars and concerned citizens, including Nishio, to recover these censored books reveal not only, at least in part, the cultural and psychological devastation wrought by the Americans during the postwar and the resiliency of local populations in the face of relentless kinetic, economic, and psychological warfare, but also much of the nature of current, American-dominated geopolitical realities in Japan.

How the Books Were “Burned”

The American occupation of Japan (1945-1952) was much more than military. In imposing a new constitution on Japan in 1947, seeing through the passage of eugenics legislation (*Yūsei Hogo Hō*) in 1948, and, three years after the occupation officially ended, funding the creation of the Liberal Democratic Party in 1955 as a vehicle for American power in the country, Washington transformed Japan politically, biopolitically, economically, geopolitically, and even epistemologically, creating a vassal state without equal in the American Empire.

The old Japan, the Japan that had dared to fight Washington, was erased, and a new Japan, a pliant supplicant to American hegemony, was transplanted in its place (Yoshida, 2016).

However, how did Washington do this? Until August of 1945, the Empire of Japan had been locked in a bitter war with the United States, as well as with the Nationalists in China, other Allies, and, later, the Soviet Union. How did the American occupiers who arrived in September succeed in turning a formidable enemy into a complacent junior partner? The answer lies in large measure in the erasure of Japanese history and identity through a systematic propaganda and information warfare program carried out by Washington and collaborators inside Japan. Some examples of American censorship and information war during the Occupation include the well-known GHQ (General Headquarters)-directed purge of communist and other leftist figures, the War Guilt Information Program (WGIP), and the press code (Sekino, 2015; Sekino, 2016; Takahashi, 2014; Takahashi, 2019; Ōmori, 1975; Ōmori, 1976). The purpose of this widescale manipulation of information was to induce a state of helplessness and disorientation, making it unlikely that Japan would ever again stand up to Washington in the latter's imperial drive in Asia and the Pacific.

The WGIP, as described in a March 3, 1948, directive issued by the Civil Information and Education (CIE) section of the Supreme Command for the Allied Powers (SCAP), GHQ, set forth the objectives of Washington's information warfare. The WGIP, according to the document, was to "make clear to all levels of the Japanese public the facts of their defeat, their war guilt, [and] the responsibility of the militarists for present and future Japanese suffering and priva-

tion" (General Headquarters [GHQ], 1948). The WGIP was "first initiated" from "October 1945 to June 1946," and was broad in scope, having been "implemented through all public information media in Japan; newspapers [...], books [...], magazines [...], radio [...], and motion pictures" (GHQ, 1948). The press code, which SCAP launched with a September 19, 1945, directive (SCAPIN 33), worked along similar lines as the WGIP. The press code, really a sweeping censorship program, set forth thirty categories of forbidden discourse, including criticism of the Occupation and any mention of war crimes committed by the Allies (Morgan, 2024, pp. 14-16). GHQ stood up a Civil Censorship Detachment (CCD) on October 8, 1945, to oversee the censorship of virtually all Japanese public discourse, as the Occupation authorities had ordered (Kamijima, 2018, p. 27).

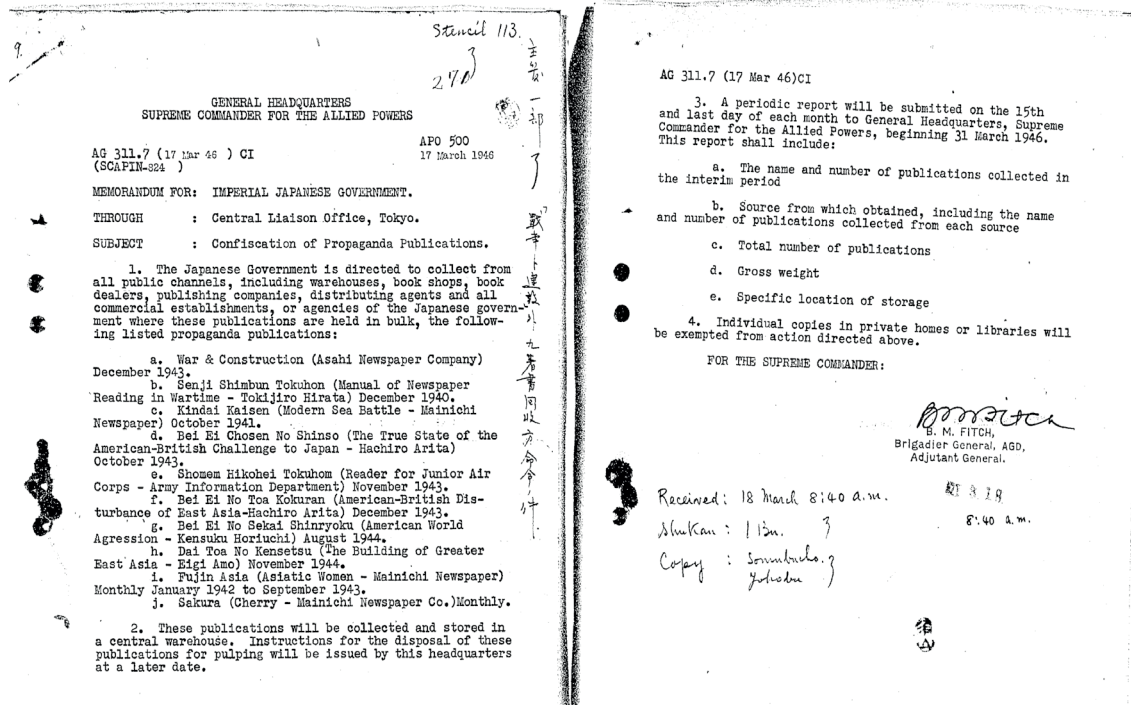
While scholarly attention inside of Japan has been directed in recent years toward the WGIP and the press code, by far the most important pillar of the Americans' postwar cultural lobotomization of Japan was the listing and confiscation of what GHQ in Tokyo referred to as "propaganda publications." In a March 1946 memorandum (SCAPIN 824) on the subject of "Confiscation of Propaganda Publications," the American Occupation ordered as follows:

The Japanese Government is directed to collect from all public channels, including warehouses, bookshops, book dealers, publishing companies, distributing agents, and all commercial establishments, or agencies of the Japanese government where these publications are held in bulk, the following listed propaganda publications (CIS, 1946).

The listed “propaganda publications” expanded far beyond those listed in the original 1946 memorandum. By 1949, the Japanese government, working at the behest of the Occupation, had confiscated more than 7,700 titles. A 1949 Monbushō report listing the confiscated works runs to 215 pages (Monbushō Shakai Kyōikukyoku (Ed.), 1949). The American government had held high a banner of freedom and democracy during its drive to conquer the Pacific Ocean. Once in Japan, the same government, continuing to boast of its “democratization” of its former enemy, launched and sustained one of the most thorough revisions of history and reprogrammings of an entire society in the twentieth century.

This widespread, systematic censorship cam-

paign was thus emblematic of American activities in and against Japan during the postwar period. As Japanese scholar Etō Jun (1932-1999) has demonstrated, the American Occupation authorities, working with collaborators in the Japanese government and media, created what Etō called a “closed linguistic space” (*tozasareta gengo kūkan*) (Etō, 1994; Etō, 2015, pp. 188-212). The censorship was so extensive and seamless that many Japanese people did not even realize that their information horizons were being pulled into a line coterminous with the extent of Washington propaganda. Washington did not begin its propaganda activities after first landing on the Japanese coast. Washington’s censorship, ranging often to cultural genocide, of non-white people began long before the war with Japan was on the horizon.



Memorandum dated March 17, 1946, titled “Confiscation of Propaganda Publications” (SCAPIN 824) (Photo: CIS, 1946).

The history of virtually any indigenous group in North America or the Pacific, including the Philippines, is likely to include a period of attempted cultural erasure at the hands of Americans (Adams, 2020; Talbot, 2015; McGranahan, 2010, 163-183; Conboy & Morrison, 2002; Schueller, 2019). However, in Japan, this aspect of Washington's rule was also whitewashed. Not only was there no postwar discussion in Japan of Japanese history beyond what Washington would allow, but there was also no discussion allowed of America's history of cultural and bodily extermination campaigns in Hawai'i, against Native Americans, against Filipinos, or elsewhere. The Japanese information-consuming public not only did not know the truth about the recent war and the nature of the occupying government, but, thanks to the "closed linguistic space," did not even know that it did not know. Censorship was complete.

Another Kind of Cultural Destruction

Indeed, the American Occupation did not initiate information control in Japan. As scholar Ruriko Kumano writes:

The US Occupation's education reforms must be evaluated against the background of Japan's pre-war system. Officials at the GHQ in Tokyo were aware of the brutal persecution of "dangerous thoughts" in Imperial Japan, a history of thought-control that had started from the 1868 Meiji Restoration and lasted till the utter defeat in 1945. This painful history is a pertinent backdrop to the US zeal for drastic reform during the American Occupation (summer of 1945-spring of 1952) (Kumano, 2023, p. 5).

There was, as other scholars have observed, a prewar and wartime "empire of censorship" in Japan, with often more continuity than rupture between the prewar, wartime, and postwar periods (Kōno et al., 2014; Hori, 2012, pp. 142-146). In one particularly well-known case, the progressive magazine *Chūō Kōron* was subjected to harsh censorship by Japanese authorities who did not take kindly to the publication's liberal, internationalist editorial line (Chūō Kōronsha (Ed.), 1965, pp. 278-302). GHQ was not the first to squelch the exchange of views in Japan, then. American Occupation censors inherited, used, and, in many ways, even enhanced a pre-existing censorship regime (Maki, 2014, pp. 389-395).

However, historian Nishio Kanji (1935-2024) distinguishes the burned books (confiscated literature) actions of GHQ from censorship, as practiced by the Japanese government. Censorship, Nishio argues, is partial and often noticeable, but book burning (book confiscation) is total, and, by that same measure, culturally debilitating. "From January 1, 1928, until September 2, 1945," Nishio writes:

Approximately 220,000 titles were published in Japan. Of that number, 9,188 books were selected out [by GHQ] for inspection, and, of those, 7,769 were designated 'Propaganda Publications for Confiscation' [bosshū sendenyō kankōbutsu]. This selection and confiscation are what I refer to here as the 'burning of books' [funsho kōi]. The Occupation authorities drew up the master list of 7,769 titles. The Japanese government carried out a nationwide confiscation of those titles. It is within reason, perhaps, that the Oc-

cupation forces would seek to confiscate the works that together expressed the vast body of wisdom that was of decisive importance in forming the will to fight during the period of the Greater East Asia War. From the Japanese side, however, the loss of this body of work is tantamount to the occultation of history as a whole. Some may argue that the confiscated titles contained books that were products of whipped-up wartime fanaticism, but fanaticism is itself part of history. 'Book burning' is, then, a separate thing from 'censorship'. Not only separate, but an area of study of such great importance as to be without parallel in terms of issues impinging on a country's historical continuity. Another problem is the question of why the confiscation of these thousands of volumes has never been taken up until the publication of this series (Nishio, 2008a, pp. 17-18).

Nishio's last point above gets to the heart of what the American Occupation's "book burning" did to the Japanese psyche and sense of cultural identity. As if to confirm Etō's point of a closed-off discursive space, Japanese historians prior to Nishio did not undertake any large-scale investigation of the more than seven thousand titles that the foreign army that had occupied their country had ordered stricken from the historical record. (Historian Jonathan Abel (2012), however, is skeptical of the scale of the censorship as Nishio has presented it.)

While the prewar and wartime Japanese state censored the Japanese press extensively, most readers knew that censorship was taking place.

Journals that had been censored often used circles or other marks to indicate where forbidden words and sentences were, making the censorship obvious to any reader. (Figurative) Book burning, however, was a trackless suppression of information. Not only that, but in depriving an entire people of their historical and cultural legacy, the American book burning in Japan left the Japanese without the psychological ballast even to mount a recovery of their own, uncensored past. A people without a history, without a culture, is a people that must remain dependent on a conqueror. This is precisely what has happened, and what remains the case, in Japan today, which is host to more American military facilities than any other country on earth apart from the mainland United States (Ministry of Defense of Japan, n.d.).

Recovering the "Burned" Books

Many of the "propaganda publications" that the American Occupation authorities ordered confiscated were works of history and politics. Reading through recovered and republished copies of these books is a jarring exercise in decolonization. Many volumes contain information vastly different from the Washington view of world events. Following Nishio Kanji's lead in selecting out funsho for spotlighting here, as well as the lead of other public intellectuals who have pre-selected some of the thousands of funsho titles for reintroduction to the public, I briefly introduce below some of the funsho to give an idea not only of what kinds of books Washington censors wanted made unavailable in Japan, but also what kinds of ideas, in general, Washington continues to disallow today.

Many of the works which Washington suppressed in postwar Japan contain accurate representations of racism and cruelty in the United States, as well as of the racism and cruelty of Europeans in African and Asian colonies. This is not an exoneration of Japan, to be sure, but it is a reminder that Washington censors were aware of their racism and were at pains to erase representations of it abroad. As with the censorship of reporting on acts of rape and other assaults against Japanese civilians by American servicemen, and as with the virtual excising of the atomic bombings of Hiroshima and Nagasaki from the proceedings of the International Military Tribunal for the Far East (“Tokyo Trial”), with the suppression of thousands of works of Japanese history, politics, and other subjects, the full historical record of American crimes in Asia and the Pacific was repurposed in furtherance of Washington’s preferred narrative (CIS, 1945). To Japanese readers with access only to the sanitized, propagandized version of “history,” the United States seemed a beacon of democracy, a paragon of racial harmony, and a selfless champion of human rights worldwide.

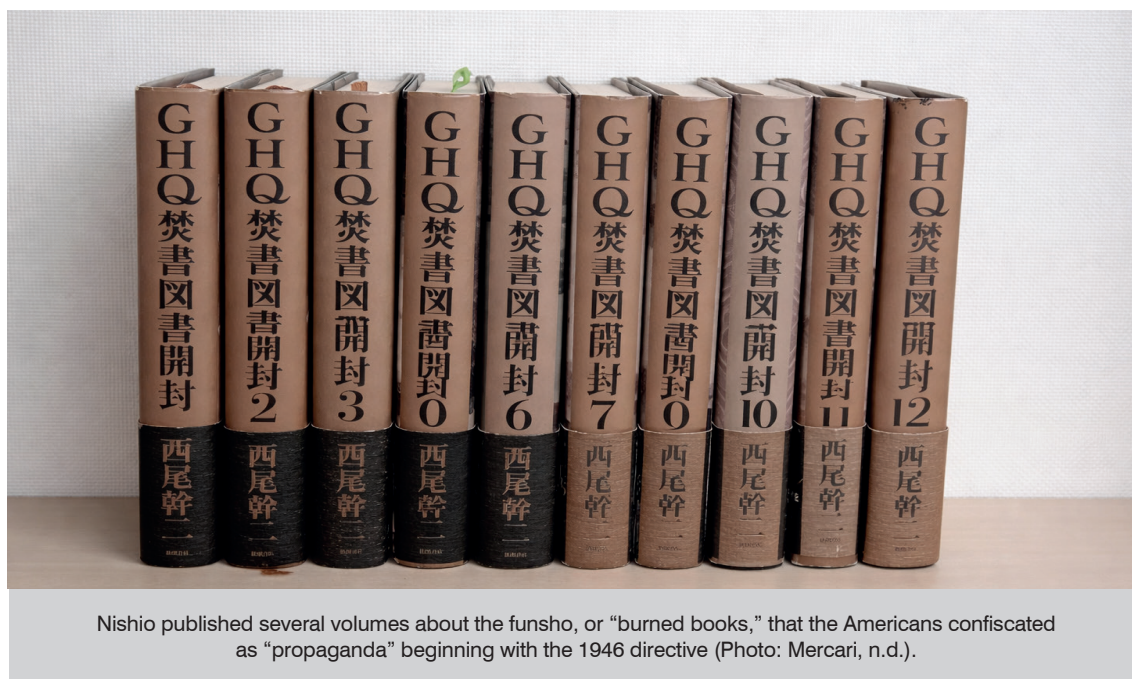


Nishio notes the irony in that the United States, which champions freedom of thought and of the press, trampled on these freedoms during the occupation of Japan.

Things might have remained in this state had some conscientious researchers and public intellectuals in Japan not begun to recover the cultural and historical legacy that the Americans had tried to destroy. The above-mentioned Japanese histo-

rian, Nishio Kanji, was a pioneer in researching American censorship in Japan during the postwar period. Nishio published several volumes about the *funsho*, or “burned books,” that the Americans confiscated as “propaganda” beginning with the 1946 directive. The first of this series, published in June of 2008, opens with photographs of some of the original volumes—a reminder that what the Americans thought they had excised from memory remained preserved despite the occupiers’ orders to relinquish them. The photographs are followed by an essay in which Nishio positions the figuratively burned books historically and historiographically. Nishio notes the irony in that the United States, which champions freedom of thought and of the press, trampled on these freedoms during the occupation of Japan. Nishio further notes, with shock and sadness, that Japanese intellectuals quickly took up the language of “propaganda,” imposed by the Occupation, to describe their own country’s intellectual output prior to the arrival of Americans in September of 1945 (Nishio, 2008a, pp. 15-16). Nishio’s work is not an indictment of any one country, but rather a work of historical recovery and cultural revivification, of bringing back to life the rich complexity of a people and their shared past.

Nishio’s “burned books” series is, as his sense of mission would indicate, a meticulously researched body of historical scholarship. In volume after volume, Nishio brings back to life, page by page, the realities and complexities of Japan’s pre-September 1945 past that the American occupiers were determined to erase from the historical record. Nishio’s volumes abound with recovery. To give just a sense of the scope of Nishio’s recovery work, I present below a broad sample of the historical record, brought back into public view from ban-



Nishio published several volumes about the funsho, or “burned books,” that the Americans confiscated as “propaganda” beginning with the 1946 directive (Photo: Mercari, n.d.).

ishment to the funsho lists.

Matsumura Ekiji's (1913-1984) 1938 book, *It-tōhei senshi* [The battle death of a private first class], is the story of an army private first class whose daily experiences at war include not only privation and suffering but also kindness toward small animals (Nishio, 2009, p. 15). The 1943 book *Tomoshibi: sora no shōnenhei senki* [Lamplight: wartime diary of the young soldiers of the sky], by Kuramachi Akitsugu, humanizes the young men who undergo strict training at the Yokaren (Kaigun Hikō Yokarenshū), the Naval Aviator Preparatory Course (Nishio, 2009, pp. 83-96; Takano, 2004). Likewise, the 1939 book *Buntaichō no shuki* [Handwritten diary of a squad leader], by Muneta Hiroshi (1909-1988), shows what Nishio describes as the “forgotten human feelings” (wasurerareteiru [...] ninjō) of those who served in the Imperial Japanese military (Nishio, 2009, p. 223). These works are important because they help counter racist stereotypes of Jap-

anese people, and of Asians more generally, as sub-human, stereotypes that were in wide circulation in the United States before and during the mid-century war with Japan (Dower, 1986).

Other “burned books” from Nishio's funsho recovery efforts include many volumes of spiritual reflection (Nishio, 2010, pp. 102-130), books that convey historical truth about the British affronts to the Chinese people in the Opium Wars (Nishio, 2014b, pp. 117-168), books that reveal the exploitative, barbaric, and racist nature of the British in India (Nishio, 2014b, pp. 225-255), and, highly problematically for the American occupiers, books which take an analytical approach to American actions against Japan in the years leading up to the outbreak of open hostilities in December of 1941, including a sober look at the predatory imperialism of the United States in the Hawaiian Kingdom (Nishio, 2014a, pp. 165-330; Nishio, 2011a, pp. 15-146; Nishio, 2011b; Nishio, 2013).

These works present a portrait of twentieth- and nineteenth-century history that differs significantly from the one commonly understood in the United States and many other Western countries. These funsho are therefore vital to restoring a fuller understanding of history from the perspective of some in East Asia, rather than solely from the perspective of Americans or Europeans.

Yanagita is known as someone who lamented the wholesale industrialization and Westernization of Japan. To revisit Yanagita's works is to call into question, in many ways, the Western historiographies that view nostalgia in prewar Japan as always a function of fascism.

Nishio's work has inspired many others to continue recovering the formerly-banned books in Japan. GHQ Funsho Archives, for example, is an online program, frequently updated, which invites prominent researchers and public intellectuals to comment on the history of book-banning under American occupation, the efforts to recover the banned volumes, and the banned books themselves (GHQ Funsho Archives, n.d.). The researchers' and intellectuals' interpretations are recorded and made available to the public for a subscription fee, thereby bringing the formerly-banned books back into public consciousness in ways that go beyond the print medium of the original publications. I have selected a few of those works below, based on the

prominence of both the contemporary presenter and the original author, to give an idea of how Nishio's recovery efforts continue to gain momentum.

Historian Kobori Keiichirō has provided an explication on *Nihon no shindō, Amerika no kokuminsei* [The way of the Japanese subject and the American national character], originally published in 1944 by philosopher Watsuji Tetsuro (1889-1960) and republished by Keiei Kagaku Shuppan in December 2025 (Watsuji, 1944; Kobori, 2024). Watsuji's frank look at the American national character is a sobering reminder of how the United States looked to some Japanese intellectuals before the advent of the occupation in 1945.

Politics scholar Se Teruhisa (joined by commentator Sanami Yūko) introduced folklorist and social researcher Yanagita Kunio's (1875-1962) *Shintō to minzokugaku* [Shintō and ethnology], first published in 1943 (though in shorter essay form in the summer of 1941) and re-released by Direct Shuppan in 2022 (Yanagita, 1943; Se & Sanami, 2025). Yanagita is known as someone who lamented the wholesale industrialization and Westernization of Japan. To revisit Yanagita's works is to call into question, in many ways, the Western historiographies that view nostalgia in prewar Japan as always a function of fascism. Yanagita significantly complicates this view, showing that nostalgia for disappearing Japanese culture was part of a broader, non-political social consciousness.

Former *Sankei Shimbun* correspondent Takayama Masayuki introduced Hino Ashihei's (1907-1960) *Bataan hantō sōkōgeki jugunki* [A record of being embedded with the military during the Bataan peninsula general offensive] (1942), republished by Keiei Kagaku Shuppan



An illustration representing the censorship system under the U.S. General Headquarters (GHQ/SCAP) during the occupation of Japan (Illustration: Note, 2026).

in 2019 (Hino, 1942; Nishio, 2008b, pp. 13-24). POWs at Bataan recalled with horror their treatment at the hands of their Japanese captors. However, reading Japanese diaries and personal histories of Bataan, it becomes clear that, in general, the conditions under which Western POWs suffered were also grueling for Japanese soldiers. A multiplicity of perspectives is essential for a full historical presentation of this or any other event.

Essayist and politics scholar Katayama Morihide (also working with Sanami Yūko) introduced *Nihon aikoku kakushin hongī* [Fundamental principles for patriotic reform of Japan], written in 1932 by political activist and agricultural reformer Tachibana Kōsabrō (1893-1974) and republished by Bōnan Shobō in 2023 (Tachibana, 1932; Katayama, 2025). Tachibana is a

very interesting figure whose ideas about access to land and how land is to be used give, as does Yanagita's work, a much-needed alternative view of the Japanese countryside in the prewar period. While Tachibana was a violent revolutionary, his revolutionary aims were for the liberation of the poor. Further, Occupation authorities often take credit for the "land reforms" that are said to have freed farmers from overpowered landlords. However, Tachibana and other reformers make it clear that land reform of various kinds was very much within the viewfield of many prewar and wartime public figures.

The late historian Tanaka Hidemichi (1942-2025) introduced *Kōshitsu to Nihon seishin* [The Imperial Household and the Japanese spirit], a work by historian Tsuji Zennosuke (1877-1955) published in 1936 and republished by Direct

Shuppan in 2021 (Tsuji, 1936; Tanaka, 2022). The centrality of the Imperial Household to Japanese spirituality is a topic widely tabooed today, largely due to American Occupation censorship, but Tsuji's work springs from a very deep well of Emperor-centered spiritual sensibility with roots in the prehistoric archipelago. The postwar, procedural, contractual nature of citizenship introduced by the American occupiers is largely at odds with the prewar ideas of belonging centered on the Imperial Household. This gap remains significant in postwar politics, even after more than 80 years since the end

of the war. ans have long pointed out, basically market development plans for American farmers and other food producers. The implications for Japan's national security for this *funsho* are difficult to overstate.

Intellectual historian Ōba Kazuo introduced *Hagakure*, a work by Tomono Ketsurō published in 1933 (Tomono, 1933; Ōba, 2023). *Hagakure* is a work of both stature and ill repute among many non-Japanese people. What is important about *Hagakure* is that it be read in its historical context, as with any other work. The intentional erasure of *bushidō* from Japanese consciousness in the postwar period was not merely a case of psychological disarmament; it also entailed profound costs in the form of historiographical distortion.

Because the living intellectuals listed above appear in a variety of print and online media, their work is widely known, amplifying the revivification of the *funsho* and, by extension, carrying on the late Nishio Kanji's work in new ways.



What Washington wanted, and wants, by all means to eliminate is cultures and peoples that are not compliant with Washington's prerogatives. A human being with a strong cultural foundation, in any country, will present an obstacle to Washington's designs.

of the war.

Economist Suzuki Nobuhiro introduced *Shokuryō sensō* [Foodstuffs war], written in 1944 by army officer Marumoto Shōzō (1886-1961) and republished by Keiei Kagaku Shuppan in 2024 (Marumoto, 1944; Suzuki, 2023). The prescience of Marumoto's book about the importance of foodstuffs to national security is underscored by the presenter, Suzuki, a prominent public intellectual who studies the interplay between food production and defense. Marumoto's work is also important historiographically, as the Occupation's food rescue plans were, some histori-

Conclusion: What Does Washington Fear Most?

Japan's postwar period has been, with the notable exception of the work of public intellectuals and researchers outlined above, who have striven to overcome it, a long experience of information repression in the service of Washington's information warfare. The legacy of this censorship regime continues today. The Japanese media remains constrained by a bevy of taboos (Mochizuki et al., 2022). Many contemporary Japanese researchers and political commentators note that the practice of "fake news" among the mainstream Japanese media is a legacy of the willingness with which media outlets, willingly and knowingly or otherwise, did the bidding of their Washington handlers during the most intense decades of the American-controlled postwar (Nishimura, 2017, pp.

106-154; Arima, 2008). Nishio Kanji was correct in his assessment that Washington's campaign of information suppression against Japan altered the mental landscape of the Japanese people, causing distortions in historical understanding. These distortions shape policy decisions even today.

Given the overwhelming success of Washington's cultural devastation against Japan in the postwar period, it would be easy to conclude that the suppression of information itself, or the pro-Washington policy regime that that suppression makes possible, was the ultimate goal of the American Occupation in its psychological warfare against the Japanese people. However, a recent experience suggests that Washington's propaganda was motivated by perhaps deeper fears. In early 2025, I joined Ōba Kazuo (the explainer of *Hagakure bushidō*, as mentioned above) to introduce another former funsho to the GHQ Funsho Archives series. The book chosen for us by the producers was *Nihonteki ningen* (Kinjō Shuppansha, 1942), written by the once-popular novelist and children's author Yamamoto Minetarō (1885-1966) and republished by Direct Shuppan in 2025. *Nihonteki ningen* [Those who embody Japaneseness], which was on the list of more than seven thousand books declared unpublishable and too dangerous to read by GHQ and ordered immediately confiscated, might seem, given the American Occupation's eagerness to suppress it, a work of dangerous, belligerent, hateful wartime propaganda. On reading *Nihonteki ningen*, I was surprised to find that it is filled with anecdotes and vignettes from Japanese history and cultural memory, meant to present aspects of the Japanese national character. Yamamoto emphasizes a mother's love, the respect due to women, the importance of telling the truth, humility, filial piety, and kindness. He reminds his readers that warriors in the past were honest and brave. He exhorts people to be upright, virtuous, and patient. The *Nihonteki ningen* that Ya-

mamoto envisions is a model member of society, someone that anyone in any country would welcome as a neighbor and friend.

It occurred to me while reading the book that what Washington feared most about Yamamoto's *Nihonteki ningen* was their humanity. To be sure, Yamamoto was a childhood friend of Tōjō Hideki (1884-1948), but that fact alone is hardly sufficient to explain the confiscation of a book by a beloved writer. What Washington wanted, and wants, by all means to eliminate is cultures and peoples that are not compliant with Washington's prerogatives. A human being with a strong cultural foundation, in any country, will present an obstacle to Washington's designs. It is this culturally, historically "heavy" human whom Washington seeks to deconstruct, culturally maim, historically disarm, and civilizationally ruin. The "plundering of cultural heritage in developing nations" is intended to keep those nations forever developing, forever weak, forever unable to challenge the West. However, Japan, which proved able to prosper economically despite cultural plundering, has still not recovered its own sense of cultural and historical identity after Washington "plunder[ed]" it during the American Occupation. This indicates that the destruction of "cultural heritage," and in particular the parts of that heritage which most bolster a given people's sense of pride and belonging, is the most powerful animating factor in Washington's, and the West's, centuries-long campaign against the non-Western world. 🌸

Notes

¹ The most famous funsho episodes are from China, in particular the (very likely partly apocryphal) Qin Dynasty (212 BC) response by the central government to critical scholars, and the book titled 焚書 (Fenshu, "A Book to Burn") by the Ming Dynasty Confucian scholar Li Zhi (1527-1602) (Li,

1969; Chow, 2020, pp. 146-147, 158; Chin, 2025, pp. 58-63).

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Zeynep Boz*

Türkiye's Struggle for the Restitution of Cultural Property



**Zeynep Boz is an archaeologist by training and has been heading the Department for Combatting Illicit Trafficking at the Ministry of Culture and Tourism of Türkiye since 2020. She began her career at the Ministry in 2007, working in the same department, and from 2014 to 2017 she served at the Secretariat of the 1970 UNESCO Convention. Her expertise includes return and restitution, as well as awareness-raising and capacity-building to strengthen efforts against illicit trafficking. She is also the author of the UNESCO Toolkit on Fighting Illicit Trafficking of Cultural Property, designed primarily for European law enforcement and the judiciary.*

“The primary method employed by our Ministry to secure the return of cultural property illegally removed from the country is to negotiate with the relevant foreign country and institutions and establish constructive relationships by presenting additional evidence obtained over time. Firstly, it is important to note that in so-called ‘market countries’ such as those in Europe, North America, East Asia, and the Gulf states, possessing, purchasing, and selling items classified as cultural property or cultural heritage is permitted, and collections are not subject to strict oversight unless a criminal investigation is underway. However, the current situation arising from international treaties, such as UNIDROIT, and principles, such as the UNESCO Code of Ethics for the Art Market, may encourage those involved in buying and selling to conduct more thorough provenance research to protect their reputations and avoid potential legal liabilities.”

**This interview was conducted with Zeynep Boz by Dr. Hande Günözü,
a member of the BRIQ Editorial Board.**

What efforts is your department making to prevent the smuggling and illicit trafficking of cultural property?

Zeynep Boz: Within the scope of combating the illicit trafficking of cultural property, our Ministry carries out a wide range of tasks, procedures, and activities. Department for Combating Illicit Trafficking of Cultural Prop-

erty within The General Directorate of Cultural Assets and Museums consists of three sub-directorates dedicated to local, international, and educational initiatives.

First and foremost, we implement security measures in line with international standards to protect archaeological sites within our country against criminal acts such as illegal excavations and unauthorised searches for cultural property.

Museum directorates under our Ministry operate 24/7. They carry out these duties in cooperation with the police or gendarmerie forces, depending on their areas of responsibility. When a crime involving cultural property trafficking is committed, the Museum Directorates under our Ministry also provide the reporting services required by Public Prosecutor's Offices and law enforcement agencies, as well as the safekeeping of seized artifacts. In summary, our provincial organisations, under the supervision, control, and guidance of the Department for Combating Illicit Trafficking of Cultural Property, are responsible for preventing illegal excavations and trafficking within the country, as well as for the judicial follow-up of such crimes when they occur.

Recognising that preventing the illicit trafficking of cultural property requires public awareness, significant emphasis is placed on educational and awareness-raising initiatives to protect cultural property and prevent trafficking attempts from the outset. As part of these efforts, training programmes targeting a broad audience, including judicial authorities, law enforcement personnel, and cultural heritage professionals, are being designed, alongside projects tailored to the needs of citizens of all ages. Additionally, printed and online materials are being produced for use in these activities or for optional access.

The return of cultural property illegally removed from Türkiye also serves a preventive function, as it encourages buyers in the destination countries to be more cautious when dealing with works of Turkish origin.

Rigorous National and International Monitoring

What efforts have been undertaken regarding the repatriation of cultural property returned to our country from abroad over the past five years?

Zeynep Boz: We strive to ensure that cultural property protected under the Cultural and Natural Assets Protection Law No. 2863 are tracked as comprehensively as possible across international markets and collections. Our Ministry's experts regularly screen auctions, gallery sales, and inventories of global collections using open-source data. Literature and archival research are conducted on works of art believed to be of Turkish origin and to have been illegally removed from the country. Reports are also requested from academics and museum experts. The data, information, and evidence obtained through these efforts are submitted to the relevant authorities in the countries in question via our Ministry of Foreign Affairs, with a request for the return of the said asset. To ensure these processes are managed accurately and comprehensively, our Ministry's experts evaluate Turkish legislation, international law, and the legal systems and practices of the relevant countries.

Thanks to our Ministry's initiatives, a total of 13,448 cultural artifacts have been returned to Türkiye between 2002 and 2025.

Legal Challenges in International Restitution

What legal challenges do you face in the process of repatriating cultural property?

Zeynep Boz: The primary method employed by our Ministry to secure the return of cultural property illegally removed from the country is to negotiate with the relevant foreign country and institutions and establish constructive relationships by presenting additional evidence obtained over time. Firstly, it is important to note that in so-called 'market countries' such as those in Europe, North America, East Asia, and the Gulf states, possessing, purchasing, and

selling items classified as cultural property or cultural heritage is permitted, and collections are not subject to strict oversight unless a criminal investigation is underway. However, the current situation arising from international treaties, such as UNIDROIT, and principles, such as the UNESCO Code of Ethics for the Art Market, may encourage those involved in buying and selling to conduct more thorough provenance research to protect their reputations and avoid potential legal liabilities.

The return of cultural property illegally removed from Türkiye requires legal action, as it cannot be returned without the consent of

the person or institution holding it. This is a particularly complex and challenging process, especially in countries where the relevant market is located. The most important international instrument in this field is the 1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property. This convention sets standards and has been ratified by the vast majority of countries worldwide, including market economies. However, this convention is not automatically enforceable within a country's legal system, nor is its retroactive application mandatory.



A Roman-era stele of Zeugma origin, returned from Italy. As a result of the meticulous efforts of the Ministry of Culture and Tourism, the stele was officially received at a ceremony held at the Turkish Embassy in Rome on April 28, 2023. The artifact, now in Türkiye, is on display at the Zeugma Mosaic Museum in Gaziantep (KVMGM, 2023).

Two key factors that determine restitution are the legal provisions of the country that claims ownership of the cultural property and the rules in force in the country where the work is located. These rules govern the rights of individuals and legal entities. Clearly, legal situations requiring consideration of these rights and international obligations do not always result in restitution. Conversely, receiving countries are increasingly compelled to act more cautiously and cooperatively due to growing demands from countries of origin and heightened public awareness.

Anti-Smuggling Agreement with 14 Countries

What international cooperation initiatives are being undertaken in this context?

Zeynep Boz: Since the illicit trafficking of cultural property is a transnational crime, international cooperation is of great importance. UNESCO-led multilateral mechanisms bring together all participating countries to address issues such as cultural heritage, ownership, and the prevention of trafficking, and establish standard practices. For this reason, we can consider UNESCO's role in this field to be vital. Beyond multilateralism, another important mechanism for us is bilateral relations. These can establish highly effective collaborations and communication channels with the destination, transit, and countries of origin. To date, we have signed agreements or memoranda of understanding with 14 countries to combat the illicit trafficking of cultural property. These countries are Greece, Bulgaria, Romania, Serbia, Hungary, Switzerland, Italy, Iran, Turkmenistan, Uzbekistan, China, Ecuador, Peru, and the United States.

The Nexus Between Cultural Property Trafficking and Terrorism

What is the extent of the link between the illicit trade in cultural property and terrorism?

Zeynep Boz: The link between the trafficking of cultural property and terrorism is a matter that has been frequently addressed and proven by researchers in this field. This issue has also been identified in United Nations Security Council resolutions, which ban the sale of any artifacts originating from Iraq and Syria and require the relevant countries to take measures in this regard. This has enabled the suppression of demand for artifacts linked to terrorism. Although a formal link between cultural property trafficking and terrorism in every single case cannot always be established through a United Nations Security Council resolution, it remains a critical issue requiring careful attention in many regions. It must remain on the agenda to ensure the protection of cultural heritage.

A Comprehensive Inter-Institutional Approach and Future Outlook

What measures has our country taken to combat the looting of cultural heritage, and what initiatives are planned for the future?

Zeynep Boz: The preservation of cultural heritage is an established field, yet it is also directly influenced by innovations. Our country's experience and expertise in this area, spanning over a century, has created a system that has been developed through academic research and bureaucratic practices. Based on our own experiences

and through international cooperation in the fight against the trafficking of cultural property, we anticipate that artificial intelligence applications will become increasingly important in areas such as digital inventory, advanced imaging and control systems, and the identification, classification, and comparison of artifacts. Our Ministry's digital inventory system, MUES, aims to digitise our entire collection and store it in a database. Additionally, cross-functional applications are being designed through various modules within this system. One of these is the Anti-Smuggling module. This module will enable the Department for Combating Illicit Trafficking of Cultural Property to record the issues and cultural property being tracked and retrieve data tailored to different needs.

Department for Combating Illicit Trafficking of Cultural Property will strengthen its central role in the fight against illicit trafficking within the country and abroad by leveraging technological, legal, and scientific advancements, combined with its own expertise and mission. The goal is to accelerate the monitoring of incidents and legal proceedings domestically and ensure that the information obtained is processed by experts, providing a broad perspective and transforming it into detailed narratives. This will enhance the depth and quality of operations conducted in coordination with domestic law enforcement agencies and judicial authorities. This investment in expertise and capacity building will further consolidate our country's leading global position in this field, which can be viewed as a crime-fighting and protective measure.

We intend to maintain an active presence within international organisations to combat the illicit trafficking of cultural property and to enhance

the effectiveness of our bilateral relations. We will prioritise tracking cultural property illegally removed from our country using new technologies. Given the complexity of the data, legal framework, and evidence-gathering processes involved in these efforts, we hope these developments will foster a more comprehensive perspective.

Communication will continue to grow in importance in the near and distant future, becoming a defining factor in quality across virtually every field. For this reason, we will organise training programmes for all public officials and other relevant experts, whether directly or indirectly involved in the protection of cultural property, covering both general principles and specific areas tailored to new needs. These specialised training programmes will play a key role in developing specific skills and keeping pace with developments. We will continue to produce content for children and young people in schools, museums, and other venues, as well as on digital media. We will also provide materials to enable third parties, such as teachers and museum educators, to develop projects with a much broader range of content.

As in other fields, the extensive use of technology in efforts to preserve cultural heritage further highlights the importance of information management and specialisation. For technology to deliver its expected benefits, it is also essential that we preserve the traditional working methods and perspectives that have been developed in cultural heritage over the centuries. Maximising communication among universities, ministries, and other relevant stakeholders is therefore crucial. As the Ministry of Culture and Tourism, we are committed to fulfilling our mission of bridging the past and the future within this framework. 🌸

A Critical Analysis of the Agreement between Türkiye and Switzerland on Preventing Illicit Import and Facilitating the Repatriation of Cultural Property



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ABSTRACT

International agreements are important instruments for preventing the illicit trade of cultural property and in strengthening cross-border cooperation to address this global challenge effectively. However, asymmetrical power dynamics between culturally rich nations and market-oriented countries are sometimes evident in certain provisions of these agreements. The agreement between Türkiye and Switzerland on the prevention of the illicit import and the repatriation of cultural property traces this asymmetry. Although certain imbalances in bilateral international agreements suggest that the interests of market-oriented countries are prioritized at the expense of culturally rich nations, this does not imply that the agreements are entirely ineffective in combating illicit trade in cultural property. This study examines the rise in illicit cultural property trade, the actors combating it at national and international levels, and highlights the role of international agreements in this context. Subsequently, the general framework of the agreement between Türkiye and Switzerland will be analyzed, along with the measures it contains to combat illicit trade and facilitate repatriation. Under the Agreement, Türkiye is expected to submit the largest number of repatriation claims. The final part of the study discusses the asymmetrical aspects of the Agreement that may hinder the effective repatriation of cultural property that was illegally imported into Switzerland from Türkiye.

Keywords: asymmetrical provisions, illicit import, illicit trade in cultural property, repatriation of cultural property, Türkiye - Switzerland Agreement.

Introduction

ANNUAL DATA ON THE ILLICIT TRADE IN cultural property indicate that national laws, international treaties, intergovernmental cooperation, and administrative, criminal, and law enforcement measures have been insufficient in preventing this trade. The data varies from year to year. For example, a 1999 report estimated that the annual volume of illicit trade in cultural property amounted to \$7.8 billion. (Calvani, 2009, p. 29).

Additionally, an article published in 2003 stated that this value was approximately 2 billion dollars per year (Forrest, 2003, p. 593). According to 2026 data from the United Nations Office on Drugs and Crime (UNODC), this figure is estimated to range between 3.4 and 6.3 billion dollars (OSCE, n.d.). Moreover, the trafficking of cultural property constitutes a form of money laundering and accounts for a substantial portion of such illicit activity (Schneider, 2013, p. 96). Some countries play a key role in the illicit trade of cultural property.

In other words, certain market countries can facilitate this trade by creating demand for cultural property, thereby enabling its circulation through illegal channels and legitimizing it through money laundering processes. Switzerland is both a target country and a transit country for cultural property smuggling (Federal Department of the Interior, 2001, p. 183). It is well known that this country is an attractive market, especially for the purchase and sale of illegally unearthed archaeological artifacts. Additionally, during World War II, Switzerland was used as a transit point or temporary storage centre for artworks and cultural objects removed from Europe's war and occupation zones. Switzerland continues to maintain this role even today. Indeed, it has provided temporary protection for numerous cultural properties brought from Afghanistan.

The Agreement between the Government of the Republic of Türkiye and the Swiss Federal Council on the Prevention of the Illicit Import and Transit and the Repatriation of Archaeological Cultural Property was signed in Ankara in 2022 and entered into force in 2023 (Official Gazette, 2023).

In 2003, Switzerland implemented the *Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property* (United Nations Treaty Series, 1972), commonly referred to as the “1970 UNESCO Convention”, into its domestic law and introduced comprehensive legal regulations against

the illicit import and export of cultural property. In recent years, Switzerland has taken a more active role in combating trafficking through international cooperation and repatriation mechanisms. In other words, although Switzerland's role in the international circulation of cultural property has occasionally been subject to criticism, it has recently been making efforts to align its practices more closely with the principles of combating illicit trade through the legislation it has adopted and the international treaties it has ratified.

The Agreement between the Government of the Republic of Türkiye and the Swiss Federal Council on the Prevention of the Illicit Import and Transit and the Repatriation of Archaeological Cultural Property was signed in Ankara in 2022 and entered into force in 2023 (Official Gazette, 2023). By entering into this Agreement with Türkiye, Switzerland aims to improve its image regarding perceptions of association with illicit trade, promote the exhibition of Turkish cultural property, continue collaborative excavations and research, and strengthen bilateral efforts against illicit trade. However, certain provisions in the Agreement indicate that Switzerland has not fully abandoned its past practices and reveal an ongoing intention to retain illicitly traded cultural property within its territory.

This study will first examine the reasons behind the increase in the illicit trade of cultural property, followed by a discussion of the various actors involved in combating it at both national and international levels. It will then consider the role of international agreements in regulating cultural property trafficking. The main focus of the study will be an in-depth analysis of the Agreement between Türkiye and Switzerland, with particular attention to its provisions governing cooperation and the repatriation of cultural property. From

Türkiye's perspective, certain elements of the Agreement are asymmetrical, favoring Switzerland. However, despite these imbalances, Switzerland has facilitated the repatriation of some cultural property to Türkiye under the Agreement.

Reasons for the Increase in Illegal Trade of Cultural Property and Actors in the Fight Against This Trade

Factors Increasing the Illicit Trade of Cultural Property

Several factors contribute to the rise of illicit trade in cultural property. Among these, the de-

mand for such cultural property is a fundamental driver directly encouraging this trade. As long as there are collectors and institutions willing to pay high prices, illegal excavations and illicit trade will continue. Some countries, particularly the US, France, Switzerland, the UK, and Germany, have traditionally been target markets due to their strong art markets, high purchasing power, and well-developed auction infrastructures.

In response to this persistent demand, traffickers employ various methods to supply the illicit market. Illegal excavations, theft of cultural objects, and the production of replicas or forgeries are among the primary techniques used to move cultural property from source countries to buyers.



Following the agreement, the cultural artifacts, which were officially handed over during a ceremony held at the Turkish Embassy in Bern on October 11, 2023, were brought from Switzerland to Türkiye and placed in safekeeping at the Museum of Anatolian Civilizations (Photo: KVMGM, 2023).

In addition to traditional methods, advances in technology and the use of new equipment have facilitated access not only to terrestrial cultural sites but also to underwater heritage, thereby increasing illegal excavations and looting. Developments in laboratory techniques have also contributed to a rise in the production of forgeries and replicas, making it easier to create items that even experts find difficult to distinguish from authentic artefacts. For instance, the bronze cast statue of Alexander the Great, returned to Greece, sparked debate among experts, archaeologists, and academics over whether it was genuine or a forgery (Deutsche Welle Documentary, n.d.).

Cultural property is frequently used in money laundering activities. Illegally obtained proceeds can be legitimized through the purchase, sale, or export of such property, giving the appearance of lawful economic activity.

In recent years, the use of cultural property as a tool to finance terrorism, as seen in the case of Isis, the systematic destruction of cultural heritage belonging to a particular ethnic group in order to erase their historical and cultural traces, as observed in Bosnia and Herzegovina, and the ease of smuggling cultural property abroad due to regime changes, civil wars, and armed conflicts, as in Afghanistan, Cambodia, Iraq, and Syria, have all contributed to the global rise of illicit trade in cultural property. It is estimated that between 2003 and 2005 alone, approximately 400,000 to 600,000 artefacts were removed from Iraqi terri-

tory, three to four times the number of items collected through excavations by the Iraq National Museum since the 1920s (Koush, 2005, p. 32).

Cultural property is frequently used in money laundering activities. Illegally obtained proceeds can be legitimized through the purchase, sale, or export of such property, giving the appearance of lawful economic activity. In particular, the introduction of cultural property obtained through undocumented or illicit excavations into the market facilitates the injection of illicit proceeds into the economy without leaving a trace in financial transactions. Indeed, among the *obliged persons and entities* listed in Article 2(1)(d) of *Law No. 5549 on the Prevention of Laundering Proceeds of Crime* (Official Gazette, 2006b) are “those engaged in the trade of historical, artistic, or antique objects, or intermediaries in such activities.” It should be noted that the terms “...those engaged in the trade” or “intermediaries in such activities” are narrowly defined. Article 26 of Law No. 5549 repealed certain provisions of *Law No. 4208 on the Prevention of Money Laundering*. Under Article 2(a)(4) of Law No. 4208, the sources of illicit funds included money or any material benefit and value obtained through acts defined under *Law No. 2863 on the Protection of Cultural and Natural Property* (Official Gazette, 1983). This provision was repealed by Article 26 of Law No. 5549. In other words, unlike Law No. 5549, Law No. 4208 explicitly included crimes specified in Law No. 2863 within the scope of money laundering (Başak, 1998, p. 27). Due to the repeal of the provision in question, doubts may arise as to whether the proceeds derived from the crimes set out in Law No. 2863 qualify as proceeds of the crime of money laundering. However, there is no ambiguity in this regard. This is because Article 2(1)(f) of Law No. 5549 defines “assets derived from crime”



The smuggling of cultural heritage and the nexus with terrorism pose a multifaceted threat to peace, security, and cultural diversity worldwide (Photo: UNICRI, 2024).

as criminal proceeds; accordingly, revenues obtained from crimes related to cultural property under Law No. 2863 are also processed within the scope of Law No. 5549.

National and International Actors in the Fight Against Illicit Trade in Cultural Property

Different actors at the international and national levels are fighting the illicit trade in cultural property. The key actors among these are international organizations, non-governmental organizations, national and international law enforcement agencies, and customs authorities. In addition to UNESCO, various international organizations in particular the International Council

of Museums (ICOM), the International Council on Monuments and Sites (ICOMOS), the World Customs Organization (WCO), and the international or European Union law enforcement agencies INTERPOL (International Criminal Police Organization) and EUROPOL (European Union Agency for Law Enforcement Cooperation); national law enforcement agencies are responsible for implementing national legislations and international treaties (Nafziger, 1985, p. 852) and for combating the illicit trafficking of cultural property. INTERPOL, an intergovernmental organization, does not have its own law enforcement force (Ekşi, 2026, p. 283). Therefore, INTERPOL operates in the field through the law enforcement agencies of its member countries.

INTERPOL facilitates cooperation among the law enforcement agencies of its member states; it conducts effective operations involving many countries, particularly including customs authorities and EUROPOL in this cooperation (Kind, 2011, pp. 175–182).

In countries that have successfully exhibited cultural property obtained legally or illegally from other countries, the illegal trade in cultural heritage is not as widespread as in some culturally rich countries, including Egypt, Greece, Türkiye, Cambodia, Syria, and Iraq.

INTERPOL has developed tools to aid in the repatriation of cultural property: “the Stolen Works of Art Database” and “the ID-Art App” (INTERPOL, n.d.-b; INTERPOL, n.d.-a). Created in 2009, the Interpol Stolen Works of Art Database contains information on stolen or missing artworks. As of 27 February 2026, descriptions and photographs of 57,000 works have been compiled. The Interpol ID-Art App was launched in 2021. This application is open to everyone and can be easily downloaded to a mobile phone. Through the Interpol ID-Art App, users can access information in the Interpol Stolen Works of Art Database, which contains more than 57,000 cultural objects from 196 member countries. Additionally, reports can be generated using the Interpol ID-Art App. Registering a cultural property in the INTERPOL Stolen Works of Art

Database ensures that it is sought in all 196 INTERPOL member countries, thereby serving as a deterrent to illicit trafficking (Ekşi, 2026, p. 283). Combating the illicit trade in cultural property is among EUROPOL’s tasks. EUROPOL carries out its activities on this issue under the category of organized property crime (Europol, 2022).

Various administrative units, law enforcement agencies, courts, and customs authorities in Türkiye work to combat the illicit trade of cultural property and its illegal export abroad. Outside the customs area, personnel of the Land Forces Command provide law enforcement services in first-degree military forbidden and security zones on land, while Coast Guard personnel serve in naval military forbidden and security zones. Police and gendarmerie personnel are responsible for areas outside these military zones; customs officers are tasked with preventing cultural objects from being subject to illicit trade at air, sea, land, and railway customs points, as well as in free zones (Ekşi, 2024, pp. 100-102). Assistance from INTERPOL may be sought to locate and return cultural heritage that has been illegally taken abroad.

In addition to various state institutions, collectors, museums, heads and staff of archaeological excavations, cultural and natural heritage boards, auction and antique houses, and companies involved in the transportation, packaging, and insurance of cultural property can also play an effective role in combating the smuggling of cultural artifacts. In fact, although Article 63 of the *Constitution* assigns the state the duty to protect cultural property, it is important for the entire society to support efforts to combat its illicit trafficking. In countries that have successfully exhib-

ited cultural property obtained legally or illegally from other countries, the illegal trade in cultural heritage is not as widespread as in some culturally rich countries, including Egypt, Greece, Türkiye, Cambodia, Syria, and Iraq. Among the reasons for this are societal awareness that cultural property should be preserved as a shared value rather than exploited for personal gain, strict supervision, and effective enforcement of legislation. On the other hand, economic difficulties, lack of oversight, and political instability are the main factors that increase smuggling in regions rich in cultural property.

When cultural objects are removed from the country as a result of illegal excavations, proving that they belong to Türkiye becomes quite difficult

because there is no official record, photograph, or visual documentation of them. In contrast, illicitly traded artefacts that have been placed in museums, exhibited, photographed, documented, studied in scientific research, or included in domestic and international exhibition catalogues make it easier to establish Türkiye's ownership. The creation of a comprehensive and systematic inventory of cultural property could facilitate the process of sharing information about stolen artefacts and help address any deficiencies (Akipek, 1999, p. 82; Ekşi, 2024, pp. 517–518). Therefore, maintaining a national inventory of cultural heritage objects and ensuring that this inventory includes not only images but also detailed information about each object is of critical importance.

INTERPOL

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LES PLUS RECHERCHÉES**

**THE MOST WANTED
WORKS OF ART**

**N°55 (b)
Décembre / December 2025**

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TABLEAU / PAINTING
Par/By: Rene Magritte
Dimensions: 46 x 38,8 cm
Vol/Theft: 26 Sep. 2025
(Donatella/Pirella Göttsche)
Dossier/File: 2025/24979
B.C.N./N.C.B.: BERN

SCULPTURE / SCULPTURE
Par/By: Oskar Hollinger
Dimension: 35 cm
Vol/Theft: 13 Jun. 2025
(Galerie d'Art/Art Gallery)
Dossier/File: 2025/24011
B.C.N./N.C.B.: VIENNA

SCULPTURE / SCULPTURE
Dimensions: 9,2 x 9,6 cm
Vol/Theft: 1 Jan. 2011 – 31 December 2011
(Museum/Museum)
Dossier/File: 2025/2381
B.C.N./N.C.B.: SAKHA

PHOTOGRAPHIE / PHOTOGRAPH
Par/By: Sam Hocks
Dimensions: 21 x 40 cm
Vol/Theft: 10 Jul. 2024 – 17 Jan. 2025
(Galerie d'Art/Art Gallery)
Dossier/File: 2025/2719
B.C.N./N.C.B.: WESGADEN

PETITE D'OR / GOLD NUGGET
Dimensions: 3 x 6 x 3 cm
Vol/Theft: 15 Sep. 2025
(Musée/Museum)
Dossier/File: 2025/2347
B.C.N./N.C.B.: PARIS

ILLUSTRATION / ILLUSTRATION
Par/By: Henri Matisse
Dimensions: 24 x 44 cm
Vol/Theft: 07 Dec. 2025
(Bibliothèque/Library)
Dossier/File: 2025/4015
B.C.N./N.C.B.: BRASSIA

Every year in June and December, INTERPOL highlights a list of the most wanted works of art through a poster distributed to countries (Photo: INTERPOL, 2025).

Indeed, in 2014, the Ministry of Culture and Tourism, through the General Directorate of Cultural Heritage and Museums, launched the “National Museum Inventory System” (MUES) project. The MUES, which is still under development, is an integrated system that includes modules such as the Inventory System, the Commission and Artefact Evaluation System, the Museum Information System, the Laboratory System, the Anti-Smuggling System, and the Private Museum and Collector System (Ministry of Culture and Tourism, n.d.-b). It will serve as an important tool in combating illicit trade, as it provides a system in which the inventory of cultural heritage objects is maintained in detail.

In some operations, the quantity of seized cultural heritage objects approaches the total number of heritage objects of an entire country.

As previously noted, the fight against the illicit trade of cultural property in Türkiye is carried out by the police, gendarmerie, coast guard, and customs enforcement. The Department of Anti-Smuggling, affiliated with the General Directorate of Cultural Heritage and Museums of the Ministry of Culture and Tourism, conducts preventive and protective measures to stop the illicit export of cultural and natural heritage. However, this unit does not have direct operational or law enforcement authority (Akkuş & Efe, 2015, p. 418). Unlike Italy, where the *Comando dei Carabinieri per la Tutela del Patrimonio Culturale* operates

as a specialized law enforcement unit for the protection of cultural property, Türkiye does not have a specialized police unit devoted exclusively to cultural property (Armağan, 2022; Nistri, 2011, pp. 183–192). The Department of Anti-Smuggling carries out various initiatives to facilitate the restitution of cultural heritage objects illicitly removed from Türkiye (Akkuş & Efe, 2015, p. 418).

Law No. 2863 on the Protection of Cultural and Natural Heritage defines 34 distinct types of crimes related to cultural heritage and prescribes severe punishment for these crimes (Ülgen, 2020, p. 57; Ülgen, 2026, pp. 161–218). Cases related to crimes specified by this law are heard in criminal courts. One of these crimes is the illegal export of cultural property abroad. Article 32 of Law No. 2863 regulates the prohibition on taking cultural property abroad, while Article 68 criminalizes violations of that prohibition (Umar & Çilingiroğlu, 1990, pp. 244–248; Ülgen, 2020, pp. 135–174; Töngür, 2018, p. 108). Despite the severe punishment imposed by legislation on cultural property smuggling, such activities have not been effectively prevented. A significant number of objects considered cultural property have been seized in operations conducted by the General Directorate of Security or the Gendarmerie Command. In some operations, the quantity of seized cultural heritage objects approaches the total number of heritage objects of an entire country. For example, during operations carried out in Istanbul between January and February 2020, a total of 3,718 objects potentially classified as historical artefacts were seized, including 3,451 coins and 267 other objects (General Directorate of Security Department of Anti-Smuggling and Orga-

nized Crime, n.d.). Under the coordination of the General Directorate of Security's Department for Combating Smuggling and Organized Crime, the Adana Anti-Smuggling and Organized Crime Branch conducted the "Anadolu" operation on 10 August 2021, targeting a criminal organization engaged in international trafficking of historical artefacts across 30 provinces simultaneously. During this operation, a total of 13,398 historical artefacts were seized, of which 9,276 had been illegally excavated (Haberler.com, n.d.).

As a result of the "Peaceful Streets Operation" conducted nationwide in 2025 by the General Directorate of Security and the Gendarmerie General Command, 688 historical artefacts were seized (General Directorate of Security,

2025). It is determined through investigations which of the artefacts seized by the police or gendarmerie are considered cultural and natural property. The lists of cultural properties stolen or lost from museums or units affiliated with the Ministry, as well as from private collectors, published on the Ministry of Culture and Tourism's website are comprehensive (Ministry of Culture and Tourism, 2026; Ministry of Culture and Tourism, n.d.-a). As a result of the efforts of the Directorate for Combating Smuggling within the General Directorate of Cultural Heritage and Museums affiliated with the Ministry of Culture and Tourism, the repatriation of certain artefacts has been successfully achieved (Ministry of Culture and Tourism, n.d.-c; Habertürk, 2026).



Operations in Istanbul between 13 January 2020 and 25 February 2020 resulted in the seizure of 3,718 objects believed to be historical artifacts (Photo: EGM, n.d.).

The Role of International Treaties in Combating the Smuggling of Cultural Property

Preventing the smuggling of cultural property requires cooperation between states. Through international treaties, cooperation can be established among administrative authorities, judicial institutions, law enforcement agencies, and customs authorities. Such cooperation may also take place on the basis of international comity, even in the absence of an international treaty. However, the principle of international comity does not obligate states to cooperate. In contrast, establishing cooperation through an international treaty grants it a legally binding character, defines the rights and obligations of the contracting states, creates transparency, and thereby enables cooperation to be carried out more effectively. In particular, bilateral treaties may produce results more quickly than multilateral treaties.

Other states that possess cultural property illegally removed from a country may voluntarily return it. However, in some cases, requests for repatriation may be rejected due to the expiration of the statute of limitations, the inability to prove that the cultural property belongs to the requesting state, or the failure to pay the compensation demanded by the party that acquired the property in good faith. In such situations, states seeking the return of cultural property may resort to guerrilla tactics (Ekşi, 2024, pp. 291–295). These tactics also include refusing to lend cultural property for exhibitions in the state that is unwilling to return it, as well as denying permission to individuals from that country to participate in scientific research and archaeological excavations (Ekşi, 2024, p. 238). To provide a legal framework for addressing the problems arising in the repa-

triation of cultural property between states and to promote international cooperation, both multilateral and bilateral international agreements are concluded. These agreements typically regulate matters such as the categories of cultural property subject to return, the procedures and conditions governing repatriation, and mechanisms for cooperation and information exchange between customs authorities and law enforcement agencies. A state party that fails to comply with its obligations under such an agreement is considered to be in breach of the treaty and, consequently, to have engaged in conduct contrary to international law.

Various multilateral agreements have been concluded to combat the illicit trade in cultural property and to promote cooperation (Ekşi, 2024, pp. 123–213). Commonly known as the “1970 UNESCO Convention,” the *Convention on the Means of Prohibiting and Preventing the Illicit Import, Export, and Transfer of Ownership of Cultural Property* (United Nations Treaty Series, 1972) was ratified by Türkiye in 1981 (Official Gazette, 1981). The 1995 UNIDROIT *Convention on Stolen or Illegally Exported Cultural Objects* is regarded as a complementary instrument to the 1970 UNESCO Convention (Roca-Hachem, 2005, p. 536; Schneider, 2001, p. 482). The *United Nations Convention against Transnational Organized Crime* (UNTOC) was opened for signature in 2000 and entered into force in 2003 (United Nations Treaty Series, 2000; Official Gazette, 2003). This Convention, which has also been ratified by Türkiye, covers crimes committed against cultural property. Commonly known as the “Nicosia Convention,” the *Council of Europe Convention on Offenses Relating to Cultural Property* (CETS No. 221) was opened for signature in 2017 in the Greek Cypriot Administration of



Southern Cyprus (Council of Europe, 2022). The Nicosia Convention, which entered into force on 1 April 2022, has neither been signed nor ratified by Türkiye.

As noted by Boz (2023, p. 101) and Ekşi (2024, pp. 212–213), although some multilateral conventions do not explicitly include “cultural property” in their titles, they are still applicable to crimes concerning cultural property (for a list of these conventions, see Boz, 2023, p. 101; Ekşi, 2024, pp. 212–213). Some of these conventions were adopted by the Council of Europe, while others were adopted by the United Nations. The international treaties concluded by the Council of Europe and ratified by Türkiye are as follows: *1959 European Convention on Mutual Assistance*

in Criminal Matters (Official Gazette, 1968), *1990 Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime* (Official Gazette, 2004a), *1999 Criminal Law Convention on Corruption of the Council of Europe* (Official Gazette, 2004b), and *2005 Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism* (Official Gazette, 2016a). The international treaties concluded by the United Nations and ratified by Türkiye are as follows: *2000 United Nations Convention against Transnational Organized Crime* (Official Gazette, 2003) and *2003 United Nations Convention against Corruption* (Official Gazette, 2006a).

Bilateral cooperation agreements concerning cultural property have also been concluded. The titles of these agreements vary depending on the areas they cover. In fact, one cannot infer from the title of some agreements that they contain provisions on the illicit trade in cultural property. However, when the content of the agreement is examined, it becomes clear that cooperation in combating the illicit trade of cultural property is envisaged. To clarify the issue, examples will be given of the titles of bilateral international agreements, along with the specific provisions that establish cooperation for the protection of cultural property and the prevention of its illicit trade.

Cutting off the financial sources of terrorist acts is essential not only for the protection of cultural property but also for ensuring national and international security.

(1) Some of the bilateral agreements on cultural cooperation concluded by Türkiye also include provisions concerning cultural property. For example, the *“Agreement on Cultural Cooperation between the Government of the Republic of Türkiye and the Government of the Republic of Panama”* (Official Gazette, 2016b), in Articles 1-3 and 5-13, provides for cooperation in areas including art, culture, archaeology, museology, librarianship, and the protection of intangible cultural heritage. It also covers the preservation, restoration, and scientific study of cultural heritage, as well as participation in related congresses, symposiums, and exhibitions” (Ekşi, 2024, pp. 85–86).

(2) Several bilateral agreements on customs cooperation contain provisions designed to prevent the illicit trafficking of cultural property. For ex-

ample, *the Agreement between the Government of the Republic of Türkiye and the Republic of Angola on Mutual Administrative Assistance in Customs Matters* was signed in 2021 in Luanda (Official Gazette, 2024). Article 8 of the Agreement, titled “information on the illicit trade in sensitive goods,” provides for the exchange of information between the two states concerning acts that violate the customs laws of either party in connection with the illicit trade of works of art of significant historical, cultural, or archaeological value (for more information on the agreement between Angola and Türkiye, see Ekşi, 2024, pp. 87–89).

(3) Some bilateral security agreements contain provisions addressing both transnational organized crimes and the illicit trafficking of cultural and natural property. “The illicit trade in cultural property is one of the methods used to finance terrorism and launder money. Cutting off the financial sources of terrorist acts is essential not only for the protection of cultural property but also for ensuring national and international security. Indeed, the *Security Cooperation Agreement between the Government of the Republic of Türkiye and the Government of the Republic of Azerbaijan*, signed in Ankara in 2013 (Official Gazette, 2017a), includes cooperation in combating transnational crimes related to cultural and natural property” (Ekşi, 2024, pp. 89–90).

(4) “Numerous bilateral agreements have been concluded between Türkiye and other states to protect and promote foreign investments in Türkiye. A significant number of these agreements include provisions stating that measures taken to protect cultural and natural property cannot be interpreted as restrictions or prohibitions on foreign investment. For example, under Article 4(1)(c) of the *Agreement between the Government of the Republic of Türkiye and the Government of the Socialist Republic of Vietnam Concerning the*



Minister of Culture and Tourism Mehmet Nuri Ersoy and Swiss Minister of the Interior Alain Berset signing the Agreement on the Prevention of the Illicit Import and Transit of, and the Return of, Cultural Property (Photo: Republic of Türkiye Ministry of Culture and Tourism, 2022).

Reciprocal Promotion and Protection of Investment (Official Gazette, 2017b) states that nothing in this Agreement shall be construed to prevent a Contracting Party from adopting, maintaining, or enforcing any non-discriminatory measures aimed at protecting national treasures of artistic, historic, or archaeological value” (Ekşi, 2024, pp. 90–91).

(5) Türkiye has concluded bilateral international agreements on the prevention, illicit trade, and repatriation of cultural property (Ekşi, 2024, pp. 68–81). For example, agreements providing for mutual assistance in preventing the smuggling of cultural property and ensuring its return have been concluded with Turkmenistan (Official Gazette, 1999) and Uzbekistan (Official Gazette, 1998).

Among the bilateral agreements categorized

under the five headings above, we will focus exclusively on the Agreement with Switzerland concerning the illicit trade of cultural property. This agreement was briefly addressed in our previous work (See Ekşi, 2024, pp. 81–83). In this study, the agreement will be analyzed in detail, particularly to reveal its asymmetrical features, arising from the fact that it was concluded between a country rich in cultural property and one skilled in exhibiting cultural property borrowed from abroad. While the agreement is ostensibly designed to foster cooperation in combating the illicit trade of cultural property, we aim to show how, in practice, market countries have successfully employed legal provisions within such agreements to avoid returning cultural property that has entered their territory illegally, despite originating from resource-rich countries.

The Agreement between the Government of the Republic of Türkiye and the Swiss Federal Council on the Prevention of the Illicit Import and Transit and the Repatriation of Archaeological Cultural Property

As previously noted, international agreements serve as essential tools for combating the illicit trade of cultural property. One such agreement is the one signed on 15 November 2022 in Ankara between the Republic of Türkiye's Ministry of Culture and Tourism and the Swiss Federal Council. *The Agreement between the Government of the Republic of Türkiye and the Swiss Federal Council on the Prevention of the Illicit Import and Transit and the Repatriation of Archaeological Cultural Property* states in its preamble that it was concluded to implement the 1970 UNESCO Convention, to which both states are parties. Moreover, the preamble underlines that "the theft, looting and illicit import and export of cultural property hinders legal cultural exchange," highlighting a key concern addressed by the Agreement.

Before proceeding to the analysis of the agreement, it is useful to clarify one point. The terms "treaty," "convention," and "agreement" are translated into Turkish in the Official Gazette sometimes as "antlaşma," sometimes as "andlaşma," and especially in recent years as "sözleşme." Here, without discussing the occasional improper use of these Turkish equivalents, I would like to note that the reason for using the term "anlaşma" in the following explanations is that the same term is also used in the text published in the Official Gazette.

Subject and Scope of the Agreement

The main aim of the Agreement between Türkiye and Switzerland is to prevent the illicit transfer of cultural property. To achieve this aim, the Agreement regulates the import, transit, and repatriation of cultural property between the two countries (Article I/1).

The annex to the Agreement specifies the categories of cultural property for which both Türkiye and Switzerland may request repatriation. For Switzerland, the categories listed in the annex include stone, metal, ceramics, glass and glass paste, bone, wood, leather/fabric/various organic materials, paintings, and amber. However, it is stated that this enumeration is not exhaustive. On the other hand, a time limitation has been set regarding the cultural properties subject to restitution. The Agreement applies to objects dating from prehistoric times through to 1500 A.D. The same time limitation is also foreseen for the cultural properties for which Türkiye may request repatriation. The categories of cultural property for which Türkiye may request repatriation include stone, metal, ceramics, wood, bone and ivory, glass, documents, textiles, plaster and stucco, human and animal remains, fossils, and others (such as wall paintings, stone art, panel paintings), although this enumeration is not exhaustive.

According to Article IV(1)(b) of the Agreement, the request for repatriation applies only to cultural property illicitly imported after the Agreement enters into force. Therefore, the repatriation of cultural property illicitly taken to Switzerland before 2023 cannot be requested under the Agreement. However, there is certainly no obstacle to their voluntary return based on legislation or other international treaties to which both States are parties.

Duration of the Agreement

According to Article XV of the Agreement, the Agreement has a duration of 5 years. However, if the parties do not give 6 months' notice, the Agreement will automatically be extended for successive 5-year periods. Even if the Agreement is terminated, ongoing lawsuits will not be affected. The Agreement, being made for a fixed term, was not appropriate. In the event of political or diplomatic tensions arising between Türkiye and Switzerland regarding

the repatriation of a cultural property, it would be possible to suspend the obligations by waiting for the Agreement to expire. This situation would also provide a basis for terminating the Agreement by giving 6 months' prior notice.

The Competent Administrative Bodies of Switzerland and Türkiye and Their Duties in the Implementation of the Agreement

According to Article IX of the Agreement, the competent authority on the part of Türkiye is the Ministry of Culture and Tourism; on the part of the Swiss Confederation, it is the Federal Department of Home Affairs, Federal Office of Culture, Specialized Body for the International Transfer of Cultural Property. These administrative bodies are authorized to communicate directly with each other. The annex to the Agreement specifies the categories of cultural properties covered by the Agreement for both Türkiye and Switzerland. The competent administrative authorities of both States shall notify each other, through the authorized bodies, of theft, looting, loss, and other incidents affecting cultural properties listed in the categories contained in both lists (Article X/1). Switzerland and Türkiye shall promptly and mutually notify each other of any changes to their domestic legislation regarding the transfer of cultural property (Article X/2). The competent authorities may regularly review the implementation of the Agreement and propose amendments if necessary. They may also discuss proposals to encourage greater cultural exchange cooperation.

Representatives of the competent administrative authorities of both States shall meet no later than at the expiry of this Agreement, either in Switzerland or in Türkiye. Additionally, meetings may be convened, especially regarding significant changes in legal regulations or administrative structures related to the transfer of cultural properties (Article XII).

Notification to the Swiss and Turkish Authorities Directly or Indirectly Involved in the Implementation of the Agreement

Article VII of the Agreement regulates the principles regarding the notification of the content of the Agreement to the relevant authorities or institutions. Accordingly, Türkiye and Switzerland are obliged to disclose the contents of the Agreement, particularly to those directly affected, including the cultural and art sectors, collectors, and relevant customs and law enforcement authorities (Article VII). The purpose is to notify administrative and judicial authorities involved, directly or indirectly, in combating the illicit trade in cultural property about the existence of the Agreement.

Prohibition of Illicit Importation

Illicitly traded cultural objects can sometimes be declared to customs as worthless, or other measures are taken to prevent them from being recognized as cultural property. In addition, the legislation of the country importing the cultural property may not require an export and import permit. Therefore, Article II of the Agreement stipulates that if the other party to the Agreement requires permission to export cultural property, such permission must be presented to the customs authorities. Article II further stipulates that the customs officials of the importing State must be furnished with evidence demonstrating compliance with the legal requirements of the exporting State. There is a possibility that export documents, including export permits submitted to the customs authorities of the importing country, may be fraudulent. If it is determined that the documents are false, the cultural property must be returned to the exporting country. If the documents are not recognized as fraudulent, the import of the cultural property may be allowed; however,

in such cases, the property must still be returned in accordance with the procedures outlined in the Agreement. Furthermore, the customs declaration should include, in addition to “the cultural property object, the detailed description as possible on the place of provenance, or, if the result of archaeological or paleontological excavations, the place where the cultural property was found” (Article II).

Repatriation of Cultural Property Subject to Illicit Importation under the Agreement

Voluntary Repatriation

According to Article IV(4) of the Agreement, the primary principle in restitution is voluntariness. Moreover, no limitation period shall apply to cultural property returned voluntarily. Pursuant to this Article, Türkiye and Switzerland “support negotiations about the voluntary repatriation of cultural property that was illicitly imported to the other in the framework of good faith without limitation in time”. If cultural property illicitly imported into a contracting state is not returned voluntarily, then a lawsuit will be filed.

Judicial Repatriation of Cultural Property

Jurisdiction and Applicable Law

Article III of the Agreement governs the court with jurisdiction, the applicable law, and the administrative procedures facilitating the repatriation of cultural property. It provides that Switzerland or Türkiye may initiate proceedings for the repatriation of cultural property against the other Party in whose territory the property was illicitly imported. In such proceedings, the national law of the State where the cultural property is located shall apply.

Switzerland has enacted a specific law for the restitution of cultural property abroad. This law, formally known as the *Federal Act on the International Transfer of Cultural Property* (Cultural Property Transfer Act-CPTA) (Swiss Confederation, 2021), regulates the import, transit, and export of such property into and through Switzerland, its restitution by Switzerland, and the measures to be taken against illicit transfers.

As stated in the preamble of the Cultural Property Transfer Act, the legal basis of this Act is provided by Articles 69(2) and 95(1) of the Swiss Federal Constitution, as well as the 1970 UNESCO Convention and the *2001 UNESCO Convention on the Protection of the Underwater Cultural Heritage*. According to Article 7 of the Cultural Property Transfer Act, an export permit must be presented at the time of import. Switzerland has also concluded bilateral agreements with certain States Parties to the 1970 UNESCO Convention to facilitate its implementation (Siehr, 2008, p. 409). For cultural property illicitly imported into Switzerland from other countries with which Switzerland has concluded bilateral agreements, including Türkiye, an export permit is required. The Federal Council has concluded bilateral agreements with Italy, Greece, Colombia, Egypt, the Greek Cypriot Administration of Southern Cyprus, China, Peru, Mexico, Türkiye, and Bolivia (Federal Office of Culture, 2026).

Under Article 3 of the Cultural Property Transfer Act, cultural property belonging to the Swiss Confederation that is of significant importance to Swiss cultural heritage and registered in the Federal Registry may neither be acquired through adverse possession nor in good faith, and Switzerland’s right to restitution is not subject to any statute of limitations. Moreover, the permanent export of such cultural property from Switzerland is prohibited.

Contrary to Switzerland, Türkiye does not apply a statute of limitations for the repatriation of state-owned cultural property. According to Article 9(1) of the Cultural Property Transfer Act, “any person possession of cultural property that has been lawfully imported into Switzerland may be sued for repatriation by the from which the cultural property has been lawfully exported.” However, a lawsuit to be filed by a foreign state for the repatriation of cultural property is subject to the statute of limitations. Article 9(4) stipulates that “the State’s right of repatriation is subject to a statute of limitations of one year from the date on which its authorities became aware of where and with whom the cultural property is located”. But the lawsuit shall not be filed “later than 30 years at the latest after cultural property was unlawfully exported”. The statute of limitations was one of the most controversial issues during the negotiations of the Cultural Property Transfer Law (Noth & Noth, 2005, p. 81). The legislative reasoning indicates that, during the discussions on Article 9, the possibility of setting a 75-year limitation period for public collections and ecclesiastical collections subject to special protection under national legislation, or of exempting repatriation cases from any limitation period, was considered; however, it was later decided not to adopt this approach (Federal Department of the Interior, 2001, p. 197).

Law Governing the Statute of Limitations in Repatriation Cases

According to Article IV(3) of the Agreement, the repatriation request is subject to the legislation of the state where the cultural property is illegally located. For example, if Türkiye files a lawsuit for the repatriation of a cultural property illegally removed from its country and imported into Switzerland, the statute of limitations will be

determined according to Swiss law.

Support of the State Against Which a Return Lawsuit Is Filed

The competent administrative authority of each State where the cultural property is located, namely the Ministry of Culture and Tourism for Türkiye and the Federal Department of Home Affairs, Federal Office of Culture, Specialized Body for the International Transfer of Cultural Property for Switzerland, advises and supports the requesting State regarding the location of the cultural property. In addition, the competent administrative authority of each State shall provide the requesting party with administrative support and advice regarding the determination of the court having jurisdiction; the expert lawyers; the temporary custody and protective conservation of the cultural property until its restitution; the investigation of how the cultural property was unlawfully imported into the country; and the sharing of the information obtained with the other party (Article III/4).

Issues the Plaintiff State Is Required to Prove

Article IV provides that the State filing a lawsuit for the repatriation of cultural property “must demonstrate that the cultural property belongs to one of the categories listed in the appendix, and that it was illicitly imported to the other Party after the Agreement entered into force.” The Agreement’s weaknesses also emerge in the evidentiary burdens it places on the requesting State. First, Article 1(2) of the Agreement states that the Agreement applies exclusively to the categories of cultural property listed in the annex. This provision may give the impression that the scope of the Agreement is strictly limited to those categories.

However, thanks to the phrase in the annex of the Agreement stating “including but not limited to the listed objects,” it is understood that the scope is broader and not limited solely to the specified categories. In addition, excluding from its scope the repatriation of cultural property that was illicitly imported into Switzerland or Türkiye before the Agreement entered into force represents another significant weakness.

Circumstances in Which a Return Request Will Be Suspended

Under the circumstances listed in Article IV(2) of the Agreement, the court hearing the case shall not grant the repatriation request and may suspend the proceedings. These circumstances are as follows: The requesting State’s inability to protect the cultural property due to (1) natural disasters in its territory; or (2) armed conflicts; or (3) other exceptional events that endanger the cultural property.

It should be noted that the repatriation request is not rejected; rather, it is suspended due to force majeure. Although no maximum duration for the suspension is specified, Article IV(2) implies that the suspension continues for as long as it is impossible to protect the cultural property due to the said events. However, the Agreement does not clarify whether the requesting State may seek the transfer of the cultural property to another country. Since the Agreement is concluded between the two States, it is based on the understanding that repatriation is made to one of these two States. For example, if a cultural property could not be repatriated to Türkiye due to an earthquake and it was requested to be repatriated to the TRNC (Turkish Republic of Northern Cyprus) instead,

the Agreement does not provide an answer as to whether Switzerland would be obliged to accept this. Nevertheless, as the law applicable to the repatriation case will be Swiss law, this question will be addressed in accordance with Swiss law.

Costs and Compensation to Be Borne by the Requesting State

The Contracting State requesting the repatriation of a cultural property shall bear the expenses necessary for its protection, maintenance, and return (Article V/1). In addition, as foreseen in Article 7(b)(ii) of the 1970 UNESCO Convention, the requesting Contracting State shall pay fair compensation to any person who acquired the cultural property in good faith. The amount of such compensation shall be determined according to the law of the State in which the case is brought. One of the most delicate situations in repatriation cases is that a State, while recovering a cultural property that belongs to it, may be obliged to pay compensation. Moreover, since this compensation is determined according to the law of the State affecting the repatriation, it may sometimes result in a relatively high amount. For example, although Türkiye is the State bringing the case for repatriation, a Swiss court will apply its own law in determining the amount of compensation. In addition to the amount, the fairness of the compensation will also be assessed according to Swiss law.

Post-Return Obligations Concerning Cultural Property

Article VI of the Agreement imposes certain obligations on the State receiving the cultural

property after repatriation. The State that recovers a cultural property through legal proceedings shall: (1) protect it to a reasonable extent; (2) ensure its accessibility; and (3) send it to exhibitions to be organized in the State from which the property was repatriated. Here, “ensuring accessibility” refers to making the cultural property available for scientific research, open to visits, and suitable for exhibition.

Article VI, which regulates the post-repatriation obligations of the State recovering the cultural property, shall apply only in cases where legal proceedings are initiated for repatriation. In contrast, it shall not apply in the case of voluntary repatriation, since Article VI uses the expression “the party filing suit.”

Article VI of the Agreement indicates that Switzerland, which is not as rich as Türkiye in terms of cultural property but is highly successful in organizing exhibitions, will continue to benefit from the cultural properties it returns.

Türkiye–Switzerland Cultural Cooperation and Promotion of Education

Article VIII of the Agreement regulates cultural cooperation and the promotion of educational activities between Switzerland and Türkiye. Under this article, the Parties undertake to encourage activities such as the exchange of experience, the implementation of joint projects, and the organization of seminars, workshops, and similar events. Preservation and promotion of archaeological sites and monuments, as well as matters related to archaeology and ethnography museums, are also listed among the areas of cooperation. In addition, the reciprocal exchange or joint organization of archaeology exhibitions of interest to both Parties is included among the cooperative

activities envisaged under this article.

Cooperation is not envisioned solely between the two states. As previously noted, UNESCO, INTERPOL, ICOM, and WCO are organizations that combat the illicit trade of cultural property at the international level. Although an agreement has been concluded between Türkiye and Switzerland to establish a framework for combating illicit trade in cultural property, the implementation of the Agreement may necessitate obtaining information, support, and assistance from these organizations. For this reason, Switzerland and Türkiye are expected, under Article XI, to cooperate with international institutions responsible for combating the illicit transfer of cultural property, including UNESCO, INTERPOL, ICOM, and WCO, in the implementation of the Agreement.

Relationship of the Agreement with Other Multilateral and Bilateral Agreements on the Prevention of the Illicit Trade in Cultural Property

The Agreement between Türkiye and Switzerland was concluded to ensure the implementation of the 1970 UNESCO Convention. In addition, it regulates its relationship with other international treaties. According to Article XIII of the Agreement, entitled “relationship to other international treaties,” this Agreement in no way impacts obligations of the parties arising from other international agreements to which Switzerland and Türkiye are parties. Moreover, the *European Convention of 20 April 1959 on Mutual Assistance in Criminal Matters* (Official Gazette, 1968) is particularly important for the prevention of the illicit transfer of cultural property, and this Convention shall be applicable.

Settlement of Differences between Türkiye and Switzerland Arising from the Implementation and Interpretation of the Agreement

Article XIV of the Agreement provides that disputes arising between the two states regarding the interpretation and application of the Agreement shall be settled by peaceful means. A distinction is made between differences in interpretation and application that have not yet reached the level of a dispute and those that have. Regarding the implementation of the Agreement, the Ministry of Culture and Tourism of Türkiye and the Swiss Federal Department of Home Affairs, through the Federal Office of Culture's Specialized Agency for the International Transfer of Cultural Property, shall exchange views either orally or in writing concerning general or specific situations. Disagreements relating to the interpretation, application, and implementation of the Agreement may be subject to consultations and negotiations.

Conclusion

Switzerland both borrows and exhibits cultural property from third countries (Noth & Noth, 2005, p. 73) and provides extraterritorial safe havens or extraterritorial refuge for endangered cultural objects (Ekşi, 2025, pp. 126–127). In addition, since World War II, Switzerland has become one of the major markets for the import of cultural property, alongside the USA, England, and France (Federal Department of the Interior, 2001, pp. 183–184; Gisler, 2016; Noth & Noth, 2005, p. 73). The Explanatory Report of the Cultural Property Transfer Law states that billions of dollars' worth of cultural property has been brought into the country and that the filed lawsuits demonstrate the country's role as a hub in the unlawful transfer of cultural property. The Explanatory Report also noted that media coverage

and the filed lawsuits in this regard have caused serious harm to Switzerland's protection of cultural property and its expertise in this field. One of the main reasons Switzerland became a hub for the illicit trade in cultural property was that, prior to the entry into force of the Cultural Property Transfer Law, which implemented the 1970 UNESCO Convention, and before bilateral agreements were concluded, cultural property could be freely imported into Switzerland without regard for the export restrictions of other countries (von Segesser & Jolles, 2005, pp. 187–188). Since its entry into force in 2005, the Cultural Property Transfer Law has required bilateral agreements to ensure compliance with the export regulations of the other state. In particular, the agreement with Türkiye mandates that Swiss customs be furnished with evidence that Türkiye's export regulations have been duly observed.

International agreements serve as crucial instruments for the repatriation of cultural property that has been stolen or illicitly exported. This is exemplified by the agreement with Switzerland, which, despite its asymmetrical features, has resulted in the return of 37 cultural objects. Also under this agreement, seven cultural objects were repatriated from Switzerland and are now on display at the Bodrum Underwater Archaeology Museum (Ministry of Culture and Tourism, 2023; Ministry of Culture and Tourism, 2025).

It should be noted, however, that this agreement is deficient in certain respects and asymmetrical to Türkiye's detriment. In our assessment, the following are the agreement's weak and asymmetrical features:

(1) The fact that the agreement is concluded for a period of five years and automatically renews for successive five-year terms unless terminated by Türkiye or Switzerland six months before the expiry of the term may pose a risk that the agreement is not renewed.



(2) The requirement that a cultural object subject to repatriation must have been illicitly imported into the country only after the agreement's entry into force (Art. IV/1-b) represents the agreement's most significant weakness.

(3) The application of the law of the state where the illicit import occurred in a repatriation case (Article III/3) constitutes an asymmetry from Türkiye's perspective.

(4) Under Article IV(3), the fact that the limitation period for repatriation cases is governed by the law of the state responsible for returning the cultural property may, particularly when artefact and its location are identified many years later, result in repatriation claims being denied on the basis of the statute of limitations.

(5) Article 7(b)(ii) of the 1970 UNESCO Convention recognizes that the requesting state may be required to pay compensation when the indi-

vidual returning the cultural property has acted in good faith. This principle is reflected in Article V(2) of the agreement between Türkiye and Switzerland, which stipulates that the requesting state shall provide fair compensation to any person who acquired the cultural property in good faith.

The following section examines the reasons why the issues outlined above, under five headings, result in outcomes that are asymmetrical to Türkiye's detriment.

Under this Agreement, the state most likely to request repatriation is Türkiye. If Switzerland frequently faces the repatriation of cultural property requested by Türkiye, or if differences arise between Switzerland and Türkiye in the interpretation and application of the Agreement, this may create a risk that the Agreement will be terminated and its term not extended six months before the expiration of the five-year period.

Limiting cultural property subject to return to specific categories carries the risk of narrowing the scope, potentially excluding significant objects and imposing restrictive conditions on their integrity. However, the Agreement clarifies that the categories listed for both Türkiye and Switzerland in the two annexed lists are not exhaustive. Consequently, in practice, this categorical definition in the annexed lists does not restrict the Agreement's overall application.

However, the two temporal limitations imposed on the Agreement narrow its scope. The first limitation is set out in the annexes of the Agreement, according to which the Agreement applies to objects "from prehistoric times up to the year 1500 AD." The second limitation is established in Article IV(1)(b) concerning repatriation claims, allowing only the return of objects that were illicitly imported after the Agreement entered into force. Restricting the application of the Agreement to claims for cultural property illegally imported only after its entry into force excludes illicit trade that occurred beforehand, thereby weakening the Agreement's overall comprehensiveness.

The country most likely to submit repatriation claims under the Agreement is Türkiye. In repatriation cases initiated by Türkiye, applying the law of the state where the illicit import occurred would result in Swiss law, which favors the returning party rather than the claimant.

Under Article IV(3) of the Agreement, the fact that repatriation claims are subject to the law of the state where the cultural property was illicitly imported may lead to the rejection of legitimate claims. One commonly known practice among actors dealing with cultural property is to store objects until the statute of limitations expires and only then bring them to light (Velioğlu Yıldızcı, 2023, p. 67). Since the purpose of the Agreement is

to combat the illicit trade of cultural property and to ensure the return of cultural objects removed illegally, it would have been more appropriate for the Agreement to include a provision stating that the statute of limitations would not apply in repatriation cases, even if such a limitation exists under national law.

Finally, under the Agreement between Türkiye and Switzerland, the state requesting repatriation is obliged to pay a certain amount to a person who acquired the cultural property in good faith, even when reclaiming an object illegally removed from its territory and rightfully belonging to that state. Requiring the claimant state to provide fair compensation to a good-faith possessor effectively victimizes the state a second time, as the cultural property was already subject to illicit trade. It is unrealistic to assume that actors involved in the trade of cultural property would be unaware that the object had been subject to illegal transactions and could be considered good-faith acquirers. This issue warrants reconsideration in the drafting of future international agreements addressing the illicit trade of cultural property. Moreover, the burden of proving good faith requires a separate assessment.

Under the Agreement between Türkiye and Switzerland, the compensation to be paid is to be determined in a "just" manner, taking into account expenses incurred for the protection and maintenance of the cultural property, as well as its purchase price. Therefore, the amount of compensation the claimant state must pay to a good-faith possessor of an illegally traded cultural object will be assessed on a case-by-case basis. The Agreement does not require the exact repayment of the amount paid by the good-faith possessor, but rather the payment of fair compensation. Under Articles 9(5) and 9(6) of the Cultural Proper-

ty Transfer Law, a person who acquires a cultural property in good faith is entitled to compensation, which includes the purchase price claimed by the party requesting its return, as well as any expenses incurred for the preservation and maintenance of the property. Until such compensation is paid, the *bona fide* acquirer may exercise a right of retention. One view holds that it is sufficient for compensation to be calculated based on the purchase price rather than the market value, with the addition of interest, transaction costs, and necessary preservation expenses (Noth & Noth, 2005, p. 82). Notably, whereas Article 9(5) of the Cultural Property Transfer Law refers simply to “compensation,” Article V(2) of the Agreement between Türkiye and Switzerland specifies “just compensation.”

In particular, as in the case of cultural property purchased for money laundering purposes, the purchase price may be set far above the object’s actual value. In our view, if the person claiming to be a good-faith possessor does not provide evidence, such as a bank receipt or similar documentation, regarding the payment made, the existence of good-faith acquisition should not be recognized. Under Article 200 of the Code of Civil Procedural Law, claims exceeding a certain amount must be proven with written evidence. However, under the Agreement, both compensation claims and the proof of good faith are governed by the law of the court hearing the case. If the state requesting repatriation is Türkiye, Swiss law, rather than Turkish law, will apply to these matters. Consequently, certain provisions of the Agreement between Türkiye and Switzerland produce an asymmetrical effect favoring the market state in matters of repatriating cultural property involved in illicit trade. In contrast, one might expect it to favor Türkiye, a country rich in cultural heritage. 🌸

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Safeguarding Intangible Cultural Heritage in China: Two Decades of Experience, Ongoing Challenges, and Pathways for the Future



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ABSTRACT

Over the past two decades, China has made substantial progress in safeguarding intangible cultural heritage (ICH) through legislative measures, institutional coordination, technological innovation, and academic engagement. Key achievements include establishing a comprehensive legal and policy framework, developing a multi-level inventory system, cultivating representative heritage bearers, promoting community-based safeguarding practices, and expanding international exchange and cooperation. Despite these advances, China's ICH safeguarding efforts continue to face structural challenges, including pressures on intergenerational transmission arising from rapid modernization, regional disparities in safeguarding capacity, tensions between commercialization and cultural authenticity, and constraints in shaping international discourse on ICH governance. This paper argues that future efforts should focus on refining legal and regulatory frameworks under government leadership, strengthening inter-regional coordination mechanisms, and exploring sustainable models that integrate cultural heritage with tourism and local development. By systematically analyzing China's practical experience through policy analysis and case studies, this study seeks to provide transferable insights for countries participating in the Belt and Road Initiative, particularly in cultural governance, heritage sustainability, and intercultural dialogue, thereby contributing to the safeguarding of global cultural diversity.

Keywords: adaptive transformation, Belt and Road Initiative, Chinese experience, cultural governance, intangible cultural heritage protection.

Introduction

ON DECEMBER 8-13, 2025, AT THE 20TH SESSION of the UNESCO Intergovernmental Committee for the Safeguarding of the Intangible Cultural Heritage held in New Delhi, it was decided to transfer China's "Hezhe Ethnic Group's Imakan"¹ from the List of Intangible Cultural Heritage in Need of Urgent Safeguarding to the Representative List of the Intangible Cultural Heritage of Humanity, and to include it in the Register of Good Safeguarding Practices (SCIO, 2025; UNESCO, 2025). This deci-

sion represents the first instance in which a Chinese Intangible Cultural Heritage (ICH) element has simultaneously achieved both list transfer and inclusion in the Register of Good Safeguarding Practices, reflecting the effectiveness of China's long-term safeguarding mechanisms since its ratification of the UNESCO Convention in 2004.

Over the past two decades, through multidimensional integrated efforts encompassing legislative safeguards, resource integration, technological empowerment, and academic research, China has achieved substantial advances in safeguarding ICH.

Notable accomplishments include establishing a distinctive legal framework and policy system with Chinese characteristics, developing a comprehensive four-tier inventory system for ICH, expanding the ranks of ICH inheritors, innovating regional holistic safeguarding practices, promoting deep integration between ICH and modern economic and social development, and achieving significant results in international exchange and cooperation. However, this process also faces numerous severe challenges. These include the impact of globalization and urbanization on the survival environment of intangible cultural heritage; risks such as a shrinking pool of inheritors, an aging demographic, low social recognition, and inadequate economic incentives; intensified risks of excessive commercialization and “alienation”; and regional development imbalances. To effectively address these challenges, this

paper proposes corresponding recommendations to promote the sustained and healthy development of China’s intangible cultural heritage protection efforts. Ultimately, it aims to distill transferable insights from the Chinese context to inform cultural heritage governance and foster civilizational exchange and mutual learning among participating countries of the Belt and Road Initiative (BRI).

Practical Experience in China’s Intangible Cultural Heritage Protection Efforts

This section analyzes China’s ICH safeguarding system by critically examining policy documents, official statistics, and representative case studies. Case selection was guided by considerations of regional representativeness (e.g., Xinjiang, Hunan, Shaanxi, Jiangsu, Yulin, Zunyi) and the availabil-



Imakan storytelling is unique to the Hezhe ethnic group, who inhabit northeastern China (Photo: China Daily, 2022).

ity of documented outcomes that illustrate key mechanisms, such as legal frameworks, inheritor training, regional conservation models, and commercialization trends. To date, China has 45 items inscribed on UNESCO's lists and registers of intangible cultural heritage. Among these, 40 are included in the Representative List, 3 are on the Urgent Safeguarding List, and 2 are featured in the Register of Good Safeguarding Practices (SCIO, 2025). In quantitative terms, China ranks among the leading countries worldwide in the number of listed ICH elements (UNESCO, n.d.). More importantly, these achievements reflect the institutional maturity and policy effectiveness of China's safeguarding system.

Building on the diversity of Chinese cultural traditions, China has established a four-tier ICH inventory system at the national, provincial, municipal, and county levels. Five batches comprising 1,557 national-level representative items have been announced, with the total number of registered items across all levels exceeding 100,000. These outcomes are supported by a comprehensive legal framework, an extensive network of heritage bearers, regionally integrated safeguarding practices, a strategic shift toward revitalization and sustainable use, and expanding international cooperation (IHCHINA, n.d.).

Policy Guidance Establishes a Legal Framework for Intangible Cultural Heritage Protection

Over the past two decades, China's intangible cultural heritage protection has evolved from initial efforts focused on "documentation," "preservation," and 'rescue' to the current emphasis on "protection," "transmission," and "utilization." This transformation hinges on the development

of a relatively robust legal, regulatory, and policy framework. The Law of the People's Republic of China on the Protection of Intangible Cultural Heritage, enacted and implemented on June 1, 2011 (National People's Congress of the PRC, 2011), stands as a milestone in this endeavor. It legally enshrines the contemporary value and fundamental principles of safeguarding intangible cultural heritage, providing robust guarantees for the effective implementation, long-term execution, and efficient operation of protection policies. This legislation marks China's comprehensive entry into a new phase of legally grounded protection of intangible cultural heritage.

Provinces and municipalities have successively introduced specialized regulations, implementation rules, and local protection ordinances to safeguard ICH. These provisions address numerous detailed issues in ICH protection to ensure that related work is conducted in accordance with the law, follows established procedures, and is carried out in a standardized manner. For instance, the Xinjiang Uygur Autonomous Region Regulations on the Protection of Intangible Cultural Heritage clarify governmental responsibilities, establish a representative project inventory system, and define the recognition and management of inheritors, emphasizing the protection and transmission of ethnic-specific intangible cultural heritage projects (People's Government of Xinjiang Uygur Autonomous Region, 2005). The Hunan Province Implementation Measures for the Law of the People's Republic of China on the Protection of Intangible Cultural Heritage elaborate on intangible cultural heritage surveys, safeguarding the rights and interests of inheritors, encouraging social participation in intangible cultural heritage protection, and promoting its integration with tourism, education, and other fields (Hunan Provincial People's Government, 2015).

The Shaanxi Provincial Intangible Cultural Heritage Regulations emphasize holistic regional protection, emergency rescue preservation, and productive safeguarding, while encouraging the rational utilization of intangible cultural heritage resources to develop cultural products and services (People's Government of Shaanxi Province, 2014). The Jiangsu Provincial Intangible Cultural Heritage Protection Regulations support integrating intangible cultural heritage into schools and communities, thereby strengthening its connection with modern life (Jiangsu Government Legal Affairs Network, 2012).

The “China Intangible Cultural Heritage Bearers Training Program,” jointly implemented by the Ministry of Culture and Tourism, the Ministry of Education, and the Ministry of Human Resources and Social Security since 2015, has trained over 40,000 bearers.

In addition, central and local governments have successively promulgated a series of important supporting measures and regulations to refine the policy framework for intangible cultural heritage protection. Examples include the Opinions on Strengthening the Protection of Intangible Cultural Heritage in China issued by the General Office of the State Council on March 26, 2005 (China Government Online, 2005); the Opinions on Further Strengthening the Protection of Intangible Cultural Heritage

issued by the General Offices of the CPC Central Committee and the State Council in August 2021 (China Government Online, 2021b); the 14th Five-Year Plan for the Protection of Intangible Cultural Heritage released by the Ministry of Culture and Tourism in May 2021 (China Government Online, 2021a); The “Administrative Measures for National-Level Cultural Ecological Protection Areas” (Ministry of Culture and Tourism of the PRC, 2018) and the “Administrative Measures for the Recognition and Management of National-Level Representative Inheritors of Intangible Cultural Heritage” (Ministry of Culture and Tourism of the PRC, 2019). Together, these documents constitute an overarching policy and institutional framework for intangible cultural heritage safeguarding in China. This framework is characterized by strong government leadership, clearly defined administrative responsibilities, and the participation of specialized institutions such as ICH protection centers, museums, and professional associations, alongside broader societal involvement (State Council Gazette, 2020a, 2020b).

From the absence of national legislation for intangible cultural heritage protection before 2009, which left the field “without legal basis,” to the promulgation of the Law of the People's Republic of China on the Protection of Intangible Cultural Heritage in 2011, and further to the comprehensive coverage of local regulations across all provincial-level administrative regions supplemented by multiple management measures, China's legal framework for intangible cultural heritage protection has clearly demonstrated a progression from non-existence to existence, and from a single layer to a multi-tiered system of rule of law.



A scene from an intangible cultural heritage performance in Tianjin, northern China, on June 5, 2019 (Photo: VCG/CGTN, 2019).

Talent pool forms the backbone of intangible cultural heritage protection

Bearers are vital to the protection of intangible cultural heritage. China has consistently prioritized building a representative bearer network, establishing a four-tier protection system at the national, provincial, municipal (prefectural), and county levels. Annual assessments and dynamic management are conducted for national-level bearers, complemented by an exit mechanism to incentivize them to fulfill their responsibilities effectively. As of March 13, 2025, the national-level representative inheritors total 3,998 individuals, joined by tens of thousands of provincial, municipal, and county-level inheritors forming a vast transmission network. The Chinese government continues to refine the representative-inheritor system. Building upon its

pioneering recognition of inheritors at all levels, it has also increased support for their apprenticeship programs, skill transmission, and exchange activities. The “China Intangible Cultural Heritage Bearers Training Program,” jointly implemented by the Ministry of Culture and Tourism, the Ministry of Education, and the Ministry of Human Resources and Social Security since 2015, has trained over 40,000 bearers. Combined with extended training programs across regions, it has benefited more than 100,000 bearers. This represents a new educational model that cultivates inheritors’ capabilities in transmission, presentation, and promotion, as well as the enduring viability of intangible cultural heritage and the cultural confidence of inheritors through non-degree education. It effectively advances the protection and transmission of intangible cultural heritage (Ma, Ma, & Liu, 2020).

The “Intangible Cultural Heritage in Schools” initiative (hereinafter, “ICH in Schools”), guided by the Ministry of Education, is also a key measure to expand the ranks of inheritors. In accordance with key policy directives, including the Moral Education Guidelines for Primary and Secondary Schools, the Notice on Conducting Intangible Cultural Heritage Education in Off-Campus Activity Venues for Minors, and the Implementation Plan for Introducing Traditional Chinese Opera into Schools under the Project for the Inheritance and Development of China’s Excellent Traditional Culture, a multi-faceted approach has been adopted to integrate traditional cultural education into the academic framework. This encompasses organizing national arts performances for students across educational stages, delivering on-campus ICH lectures and exhibitions, facilitating experiential learning visits to local ICH museums, encouraging the appointment of ICH inheritors as part-time instructors, supporting the development of age-appropriate ICH teaching materials, and incorporating ICH content into specialized curricula within primary and secondary schools. These efforts guide students to “learn, utilize, and showcase intangible cultural heritage,” allowing it to take root and flourish on campus (Ministry of Education of the PRC, 2015, 2017).

Strategic Transformation in Intangible Cultural Heritage Protection Through Revitalization and Utilization

Innovative regional, holistic conservation practices rooted in cultural ecology principles mark a shift in China’s approach to intangible cultural heritage protection—from isolated preservation to ecosystem-level living conservation. The es-

tablishment of national-level cultural ecological conservation (experimental) zones embodies this core philosophy. The 23 established national-level cultural ecological conservation (pilot) zones and over 250 provincial-level cultural ecological conservation zones focus not only on intangible cultural heritage items themselves but also on the natural environments, cultural ecosystems, and community relationships that nurture and sustain them (Zhu, 2025). This holistic approach has formed a multi-tiered regional conservation network, facilitating the healthy preservation and sustainable development of intangible cultural heritage within specific areas.

Integrating ICH protection into traditional villages and community development is a crucial pathway to holistic regional conservation.

Integrating ICH protection into traditional villages and community development is a crucial pathway to holistic regional conservation. China actively promotes the integration of ICH preservation with the development of traditional villages, historic and cultural cities, towns, and beautiful leisure villages, thereby enhancing the cultural richness of rural areas. Simultaneously, efforts to protect ICH are strengthened within new urbanization initiatives, while the “ICH in Communities” program is comprehensively advanced. This approach transforms intangible cultural heritage from a “relic” confined to museums into an integral part of community culture, deeply embedded in people’s daily lives. Unlike traditional preservation models focused on individual projects or

skills, this systematic approach aims to achieve holistic and sustainable development of intangible cultural heritage, effectively preventing the risk of “isolated preservation.”

The shift from “preservation” and “transmission” to “revitalization” and “utilization” marks a strategic transformation in the protection of intangible cultural heritage. The deep integration of intangible cultural heritage and tourism stands as one of its most dynamic manifestations. China has launched numerous themed tourism routes, educational travel products, and representative cultural works featuring distinctive intangible cultural heritage. For instance, Yulin in Shaanxi Province leverages popular attractions such as the Yulin Ancient City and the Northern Shaanxi Folk Song Museum to develop innovative cultural tourism projects, including “intangible cultural heritage + festivals,” “intangible cultural heritage

+ performances,” and “intangible cultural heritage + educational tours.” Zunyi, Guizhou, has developed tourism attractions at the World Heritage site of Hailongtun. By collaborating with local universities like Zunyi Normal University, it explores the governance wisdom of ancient Chinese dynasties in frontier ethnic regions. Through the operational philosophy of “cultivating tourism through culture and highlighting culture through tourism,” it attracts visitors nationwide. The establishment of intangible cultural heritage workshops has become a key driver for rural revitalization and employment growth. Leveraging abundant intangible cultural heritage resources, over 9,100 workshops have been established nationwide, directly employing more than 270,000 individuals who have escaped poverty, with an average annual income exceeding 36,000 yuan (Wang, 2025).



Yueliangdi village in Mori Kazakh autonomous county, Changji Hui autonomous prefecture, northwest China's Xinjiang Uygur autonomous region (Photo: People's Daily, 2022).

New media platforms such as livestreaming, short-form videos, and e-commerce have become vital channels for ICH preservation. Data shows that in 2022, the number of ICH shops on Taobao reached 32,853, a 9.5% increase from 2020. ICH transaction volume grew by 11.6% compared to 2020, with ICH consumers now numbering in the hundreds of millions. Notably, younger generations (born after the 1990s and 2000s) are emerging as the primary consumer force for ICH products (Shen, 2025).

The Ministry of Culture and Tourism, the Ministry of Education, and other departments have jointly promoted the development of ICH-related academic disciplines.

The development of digital collectibles has emerged as a hot topic in ICH preservation. Television programs and online courses such as “China Through ICH” and “ICH Open Courses” have gained widespread popularity. The Ministry of Culture and Tourism, the Ministry of Education, and other departments have jointly promoted the development of ICH-related academic disciplines. According to the Ministry of Culture and Tourism’s response to Proposal No. 3164 submitted to the Third Session of the 14th National People’s Congress, as of 2025, 25 undergraduate institutions have established ICH preservation majors, forming a cluster of ICH disciplines with growing academic prominence (Ministry of Culture and Tourism of the PRC, 2025c).

Academic Research Expanding the Scope of Intangible Cultural Heritage Protection

Chinese academic research on the protection of ICH primarily encompasses five key thematic areas. The first strand explores conceptual frameworks related to ICH safeguarding, such as cultural ecological conservation areas (Zhu, 2025) and intangible cultural heritage communities (Han & Gao, 2020). The second category investigates preservation strategies, including productive preservation (Huang, 2026), holistic preservation (Yang, 2025), intellectual property protection (Rao & Dong, 2025), digital preservation (Nie, 2025), and the safeguarding of folk cultural traditions (Shan, 2013). A third focus is on the transmission and protection of ICH within ethnic minority communities. For instance, based on fieldwork in Guizhou province, Wen (2013) identifies four key issues in the protection of ethnic ICH inheritors. Fourth, scholars examine the role of institutions such as historic cities, museums, and libraries. Feng and Zhao (2022), for example, argue that community museums can effectively showcase the dynamic process of ICH preservation through the collaborative participation of diverse stakeholders. Finally, a significant body of research addresses tourism development in the context of ICH. Li and Jia (2026), using 12 cities and counties in southwestern Hubei as case studies, construct an evaluation system for ICH tourism potential and assess these regions using factor analysis and IPA. Most research findings continue to expand the connotations and extensions of issues related to intangible cultural heritage and modernization, ethnic communities, cultural diversity, cultural transmission, and heritage education.

Chinese scholars have also actively explored the development of academic disciplines for the protection of ICH. For instance, Song and He (2019) argue that building ICH protection capacity is a long-term, systematic endeavor that requires specialized disciplines to provide stable, professional academic support. Sun Yat-sen University has established ICH-focused academic programs and disciplines, including master's and doctoral programs, to promote interdisciplinary integration and professional development in ICH protection research—a pioneering attempt. Gao (2025) argues that the development of in-

tangible cultural heritage studies should shift from “dissecting” disciplinary research toward “interdisciplinary” academic innovation and development within the context of cultural ecological diversity. Pu and Zhang (2025) argue that efforts should be grounded in the development of disciplinary frameworks, academic systems, and discursive structures to strengthen the logical underpinnings of theoretical systems. Rooted in China's national conditions and current realities, these efforts should uphold subjectivity and originality, thereby accelerating the development of China's autonomous knowledge system.



A Sichuan Opera performer shares a light moment with primary school students on June 12, 2025 at a Cultural and Natural Heritage Day event in Hohhot, Inner Mongolia autonomous region (Photo: Ding Genhou/China Daily, 2025).

International Exchange and Cooperation of Intangible Cultural Heritage Protection

Since acceding to the UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage in August 2004, China has actively participated in all activities under the Convention's framework, vigorously promoted the healthy development of the international convention, and established itself as a responsible cultural power on the global stage, earning recognition as a responsible actor in global cultural governance. According to UNESCO, China currently holds the world's largest number of items inscribed on its national lists of intangible cultural heritage (UNESCO, n.d.). This demonstrates its active contributions and fulfillment capabilities in the international field of intangible cultural heritage protection, while also consolidating and enhancing the international voice and influence of Chinese culture.

Currently, intangible cultural heritage has become a vibrant golden calling card, propelling Chinese culture onto the global stage.

Established to address the growing demand for capacity-building in ICH safeguarding across the Asia-Pacific region, the UNESCO International Training Centre for the Safeguarding of the Intangible Cultural Heritage in the Asia-Pacific Region (hereinafter referred to as "the Asia-Pacific Centre"²²) has implemented annual training programs since 2014. These programs encompass key areas such as ICH capacity-building frameworks, the integration of ICH in education, and the training

of ICH instructors. The Centre's ongoing efforts were underscored by the convening of the ninth meeting of its Governing Board in Beijing on January 14, 2020. The establishment and work of the Centre demonstrate the international community's recognition of China's efforts in ICH safeguarding (China Daily, 2020). This collaboration with UNESCO represents a significant model of international cultural cooperation and provides a key platform for China to contribute to and strengthen ICH protection capacities across the Asia-Pacific region. China has pioneered international cooperation by jointly nominating and safeguarding shared intangible cultural heritage with neighboring countries. It also places great emphasis on strengthening exchanges with countries along the Belt and Road Initiative to uphold national sovereignty and cultural security. As a signatory to the Convention on Cultural Diversity, China supports, participates in, and hosts UNESCO's cultural diversity festivals to enhance global understanding of the unique essence and charm of Chinese culture (Phoenix.com, 2015).

Currently, intangible cultural heritage has become a vibrant golden calling card, propelling Chinese culture onto the global stage. For instance, "The Spring Festival—Social Practices of the Chinese People Celebrating the Traditional New Year" was successfully inscribed on UNESCO's Representative List of the Intangible Cultural Heritage of Humanity in 2024. However, approximately one-fifth of the world's population celebrates the New Year, with nearly 20 countries designating the Lunar New Year as a statutory holiday. China continues to explore the establishment of a multidimensional digital integration mechanism system, developing diverse dissemination channels and platforms. Through various formats such as TV dramas, documentaries, pro-

motional videos, stage plays, and short videos, China showcases the unique charm of its intangible cultural heritage to the world, enhancing the international influence of Chinese culture (China Social Sciences Network, 2024).

The Real Challenges Facing China's Intangible Cultural Heritage Protection Efforts

The first challenge is the shift in survival environments brought about by globalization and urbanization. In the past, intangible cultural heritage was an integral part of ordinary people's daily lives and served as a bond for community and emotional connections. Now, with intensified cross-regional population mobility and accelerated lifestyles, these functions are gradually weakening. Research indi-

cates that the disappearance or decline of traditional villages directly severs the physical spaces and cultural transmission networks upon which intangible heritage relies. The living transmission of many intangible heritage items, particularly those tied to specific regions, villages, and folk customs, depends on intact community ecosystems (Yan & Du, 2016). However, amid the tide of urbanization, numerous villages have been transformed or vanished, with original residents gradually relocating. This uproots the "foundation" of intangible cultural heritage, destabilizing cultural ecosystems. Such phenomena are sometimes even viewed as "so-called 'constructive destruction' (where modernization efforts inadvertently erode heritage authenticity)—where the pursuit of modernization inadvertently undermines the authenticity of cultural heritage".



International students from Nanchang University enjoy dragon dance during the Spring Festival in Wenchangli historical area, Fuzhou, east China's Jiangxi province, February 13, 2024 (Photo: Li Jie/People's Daily, 2024)

The negative impacts of industrialization and urbanization on the survival environment of intangible cultural heritage also include changes in traditional lifestyles, fading cultural memories, and the alienation of youth from local culture. These factors intertwine to form a complex challenge. If economic and social development fails to balance cultural ecology adequately, it may even lead to the predicament of intangible cultural heritage projects “being ‘saved’ only to be lost once more”.

The unclear ownership of many intangible cultural heritage works leads to infringement disputes and legal blind spots in commercial utilization.

The second challenge is the development of inheritors, who face numerous challenges. The core of keeping intangible cultural heritage projects alive lies in cultivating inheritors, yet the current system grapples with deep-seated issues, including a talent gap, an aging population, and insufficient social status and economic security. Many intangible cultural heritage skills, which rely on oral transmission and hands-on instruction, are often mastered by elderly practitioners. Young people, for various reasons, are reluctant to invest the time and effort required, posing significant challenges to the traditional master-apprentice model in modern society. Despite long-standing government subsidies for national-level inheritors, many intangible cultural heritage projects yield minimal economic returns, failing to support the daily expenses of inheritors and their families. Consequently, many inheritors must

seek long-term employment elsewhere to sustain their livelihoods, diverting their energy away from heritage transmission. For instance, practitioners of the Gaoshan ethnic group’s intangible cultural heritage in Hua’an, Fujian, have left their communities due to economic pressures and environmental changes, stalling transmission efforts (Hong, 2025). Similarly, practitioners of Miao silver smithing techniques in Kongbai Village, Guizhou, face comparable challenges, as younger generations increasingly choose migrant work over inheriting traditional crafts. Economic pressures and a lack of cultural identity draw inheritors toward modern industries. Contemporary youth, influenced by urban education and diverse forms of entertainment, lack a deep understanding of rural communities and traditional culture. This generational disconnect in cultural identity diminishes their “cultural need” for intangible heritage, thereby weakening the momentum of endogenous transmission.

The third challenge is the heightened risk of excessive commercialization and “alienation.” With the rapid development of the cultural tourism industry, many intangible cultural heritage projects have been incorporated into tourism development plans. However, excessive, unreasonable, and disorderly development has become widespread. Driven by the pursuit of potential commercial gains, the development process of some projects appears overly hasty and profit-driven, treating intangible cultural heritage as purely commercial products and undermining their “authenticity” and “genuineness.” Overcommercialization may also lead to the homogenization of tourism products, resulting in a lack of cultural distinctiveness. For instance, the products and cuisine showcased in various ancient towns often become overly mainstream, making it difficult for them to serve



People of the Miao ethnic group in southwest China's Guizhou Province
(Photo: CGTN, 2024).

as windows into local characteristics and ethnic cultures. Some regions have witnessed the emergence of “pseudo-folklore” and “fake intangible cultural heritage” phenomena. Certain stakeholders and unscrupulous businesses have resorted to “colluding with government officials, bribing experts, and deceiving media” under the guise of protecting intangible cultural heritage, effectively commercializing and commodifying cultural assets. This undermines the rational protection and orderly development of ICH projects. For instance, the municipal-level ICH project “Zhou Family Bone Setting Technique” in Inner Mongolia was revoked due to fraudulent practices (Sina, 2022). Intellectual property protection for intangible cultural heritage projects also faces complex

challenges. The unclear ownership of many intangible cultural heritage works leads to infringement disputes and legal blind spots in commercial utilization. For example, the infringement lawsuit involving the Suzhou embroidery piece “Drunken Concubine” highlighted the conflict between traditional creative concepts and existing laws, as well as the obstacles facing judicial protection of intangible cultural heritage (Bian, 2021). Certain countries and multinational corporations have even exploited the guise of “reinterpretation” and “deconstruction” to sever and confuse the cultural origins and value orientations of Chinese intangible cultural heritage, resulting in economic losses and cultural controversies (Shanghai Bar Association, 2021).

The fourth challenge is regional development imbalances and insufficient management coordination. According to the “2022 Report on Innovation in Intangible Cultural Heritage Consumption” released by *China Tourism News*, regarding online sales of ICH products, eastern regions dominate, with over 70% of transactions occurring on Taobao and Tmall ICH stores, giving them an absolute advantage. Central regions account for 14%, western regions 8%, and north-eastern regions a mere 4% (CTNEWS, 2022). This reflects the eastern regions’ earlier start in commercializing intangible cultural heritage resources and their relatively developed economies, which have established a pathway of “innovation and inheritance + productive safeguarding + social dissemination.” In contrast, central, western, and economically underdeveloped regions struggle to adopt digital technology and protect intangible cultural heritage, potentially leading to the gradual disappearance of valuable skills due to inadequate documentation and transmission. Disparities in economic development and uneven resource allocation have led to significant variations in the dissemination scope and influence of intangible cultural heritage across regions.

Many city and county-level institutions remain unestablished or underdeveloped.

Regarding regional collaborative management, although national-level initiatives have proposed establishing regional coordination mechanisms—such as strengthening ICH protection and transmission within major national strategies like the

Beijing-Tianjin-Hebei coordinated development, the Yangtze River Economic Belt development, and the Guangdong-Hong Kong-Macao Greater Bay Area construction—challenges persist in practical implementation. The current ICH governance system suffers from unclear legislative hierarchies between central and local authorities, creating a distorted pattern in which “both ends are solid while the middle is hollow” in practice (Yao, 2021). Additionally, responsibilities across governance tiers are unevenly distributed, with local regulations sometimes deliberately avoiding issues of regional authority allocation. Weak grassroots ICH protection institutions, a lack of dedicated staff positions, and theoretical research lagging behind practical protection efforts also reflect significant deficiencies in management coordination. Many city and county-level institutions remain unestablished or underdeveloped. Even where established, they face challenges of insufficient staffing and inadequate professional expertise.

Overall, the risks and challenges facing the protection and transmission of China’s intangible cultural heritage include: the tension between preservation and development; excessive commercialization and tourism exploitation; homogenization and dilution of core values; the risk of skills disappearing with the passing of elderly practitioners; generational succession issues among practitioners; disparities in protection effectiveness across regions (including resource allocation and preservation capacity); and insufficient management coordination. These issues share common characteristics with heritage management and cultural transmission in countries along the Belt and Road Initiative, making their resolution pathways potentially valuable for reference.



The fourth-generation inheritor of the traditional costume of the Qiang ethnic group, Chen Shijiang (right), is dedicated to interpreting tradition with modern designs (Photo: VCG/The World of Chinese, 2026).

Future Pathways for China's Intangible Cultural Heritage Protection

In response to the aforementioned issues and challenges, the authors propose the following approaches to achieve breakthroughs, aiming for a more balanced cultural ecology and sustainable governance:

First, strengthen legal safeguards and refine the policy framework. Accelerate the revision process of the *Law of the People's Republic of China on the Protection of Intangible Cultural Heritage*. Current legislation and local regulations still contain overly general provisions that lack enforceability, such as the absence of clear definitions and legal consequences for acts that distort or disparage intangible cultural heritage. During the revision process, legal provisions should be refined to clarify the attributes, content, subjects, and objects

of rights in intangible cultural heritage. Detailed explanations should be provided for acts infringing upon the legitimate rights of inheritors, with clear punitive consequences established. Second, the intellectual property protection system for intangible cultural heritage should be strengthened. Comprehensive measures should be employed to enhance law enforcement, safeguard legitimate rights, and combat illegal activities. Third, enforcement capabilities must be enhanced through strengthened legal education. Training programs should be conducted for individuals involved in intangible cultural heritage projects to improve their legal awareness and enforcement capacity. Extensive public awareness campaigns on intangible cultural heritage should be launched across society, using diverse channels such as radio, television, newspapers, and online media to raise public awareness of its protection.

Second, innovate the training model for inheritors and strengthen talent development. Establish a multi-tiered, multi-channel training system for inheritors. Support universities in establishing and expanding programs related to intangible cultural heritage protection. Encourage research institutes to develop mechanisms for master's and doctoral training. Promote the integration of intangible cultural heritage projects into campuses, classrooms, and mindsets to cultivate young people's interest in these projects and sense of cultural identity. Build representative inheritance and practice bases for intangible cultural heritage projects at all levels. Engage inheritors in teaching and research projects at educational institutions to strengthen the succession pipeline for inheritors. Simultaneously, actively elevate the social status and economic compensation of ICH inheritors. On the one hand, foster a domestic societal atmosphere that respects ICH talents, preserves ICH culture, and safeguards ICH carriers. Improve the dynamic management and incentive mechanisms for inheritors, providing material rewards and spiritual recognition to outstanding practitioners.

In the process of rural revitalization, integrate intangible cultural heritage protection with industrial development to enhance local community prosperity and strengthen public awareness and recognition of intangible cultural heritage.

On the other hand, multiple channels should be explored to ensure sustainable livelihoods for

practitioners, reducing economic pressures that drive migration and disrupt transmission. Approaches such as “intangible cultural heritage + industry/tourism” can be adopted to expand their income sources and improve their living conditions. Furthermore, professional management and research talent development for the protection of intangible cultural heritage must be strengthened. By promoting collaboration among universities, research institutions, and inheritors, think tanks, workstations, teaching bases, and practice bases for intangible cultural heritage can be established to integrate theoretical research with practical protection efforts.

Third, promote the deep integration of ICH protection with modern life. Tourism serves as a vital channel for revitalizing ICH, but vigilance is needed to address the risks of distortion and homogenization stemming from excessive commercialization. Governments must strengthen oversight of ICH tourism, establish protective boundaries, and guide the market toward developing high-quality ICH product experience venues. Immersive educational tourism routes should be created to enable visitors to gain profound insights into the cultural essence and contemporary value of ICH through their travel experiences. Fully leverage modern technologies, such as big data, virtual simulation, and artificial intelligence, to comprehensively advance digital infrastructure for the protection of intangible cultural heritage. This includes collecting, organizing, preserving, and revitalizing relevant content to build a scientific database of intangible cultural heritage. Simultaneously, encourage the dissemination of intangible cultural heritage projects on new media platforms, cultivate “viral” brands, and attract the attention and participation of younger generations. In the process of rural revitalization, inte-



A wood-carver finishes details on the head of a dragon boat in Miluo
(Photo: Deng Shugang/China Daily, 2022)

grate intangible cultural heritage protection with industrial development to enhance local community prosperity and strengthen public awareness and recognition of intangible cultural heritage.

Fourth, optimize regional coordination and management mechanisms. First, establish and improve regional collaborative protection mechanisms, promote the creation of an integrated legal framework and policy coordination system for regional ICH protection. Within major national strategies such as the coordinated development of the Beijing-Tianjin-Hebei region, the development of the Yangtze River Economic Belt, the construction of the Guangdong-Hong Kong-Ma-

cao Greater Bay Area, and the ecological conservation and high-quality development of the Yellow River Basin, strengthen regional coordination mechanisms for ICH protection and transmission. Conduct thematic research and organize signature events. Encourage developed eastern regions to enhance collaborative support for the protection of intangible cultural heritage in revolutionary base areas, ethnic regions, frontier areas, and poverty-stricken areas in central and western China, thereby achieving resource sharing and mutual learning. Second, refine the government-led working framework, coordinated by departments, and involving societal participation.

Clarify the leading responsibilities of cultural and tourism administrative departments at all levels, coordinate relevant departments to fulfill their respective duties and advance efforts collaboratively, and avoid fragmented management and unclear responsibilities. Simultaneously, further encourage and guide broad societal participation in ICH protection and transmission, fully leveraging the roles of industry organizations, enterprises, institutions, citizens, and non-governmental organizations. Third, strengthen oversight, evaluation, and performance management of intangible cultural heritage protection. Establish and improve supervision and inspection mechanisms for protection work, conduct regular assessments of the preservation status of inventory items and representative inheritors at all levels, and implement performance evaluations and dynamic management of protection units' responsibility fulfillment. Develop a scientific evaluation indicator system for critical aspects, including fund utilization, project implementation, and transmission effectiveness, to ensure the effectiveness of protection measures and the rational use of funds.

The central endeavor involves translating China's practice—marked by "government leadership, systematic safeguarding, living heritage transmission, and integrated development"—into shareable global public goods and tools for collaborative governance.

Fifth, situating China's systematic experience in ICH safeguarding within the BRI framework

for cross-cultural cooperation can reveal adaptable pathways and models of broader relevance. The central endeavor involves translating China's practice—marked by "government leadership, systematic safeguarding, living heritage transmission, and integrated development"—into shareable global public goods and tools for collaborative governance. China's standardized methodologies in top-level design, inventory establishment, and the identification and training of heritage bearers offer a tangible "institutional toolkit" for BRI participating countries, especially those in the early stages of developing their own safeguarding regimes. For example, China's multi-tiered system for designating representative ICH projects and bearers, coupled with its expertise in planning and managing cultural-ecological conservation zones, can enable effective knowledge transfer and capacity building through instruments such as joint research programs, international training workshops, and the co-development of standardized operational guidelines.

Conclusion

Over the past two decades, China's intangible cultural heritage protection efforts have evolved from initial phases of "documentation," "preservation," and 'rescue' to the current focus on "protection," "transmission," and "utilization." China now leads the world in the number of intangible cultural heritage items inscribed on UNESCO's Lists of Intangible Cultural Heritage. These achievements stem from several key factors: First, China has established a distinctive legal and policy framework under government leadership that covers all levels and sectors. This system provides robust guarantees for the effective implementation, long-term execution, and sustainable operation of intangible cultural heritage protection policies. Second, a

four-tiered system of representative inheritors has been established at the national, provincial, municipal (prefectural), and county levels through various pathways. This system provides support for talent and intellectual resources for the transmission and utilization of intangible cultural heritage. Third, China has transformed its ICH protection philosophy and model, shifting from isolated preservation to ecosystem-level living protection. This integration of ICH safeguarding into traditional village and community development achieves an organic fusion of “protection, transmission, development, and utilization.” The cultural ecological zones embody a theoretical advancement beyond project-centric approaches, mitigating risks of “constructive destruction.” Fourth, theoretical research and academic exploration by Chinese scholars have not only established a knowledge system for ICH protection

but also strengthened China’s discourse power in related fields, enhancing the global dissemination and recognition of Chinese culture. Fifth, China actively supports international cooperation and exchange in the preservation of intangible cultural heritage, showcasing the unique charm of Chinese intangible cultural heritage to the world and enhancing the international influence of Chinese culture.

At the same time, we can see that China still faces numerous practical challenges in protecting intangible cultural heritage. There is an inherent tension between preservation and development; community participation mechanisms need to be deepened, and regional development imbalances remain prominent. Meanwhile, practitioners face systemic challenges, including generational gaps, an aging population, limited social recognition, and insufficient economic security.



A scene from the 6th China Xinjiang International Dance Festival in Urumqi, Xinjiang Uyghur Autonomous Region, July 20, 2023 (Photo: Xinhua, 2023).

To resolve tensions between “commercialization and authenticity” and “regional imbalances”, future efforts must prioritize “cultural ecosystem governance”. It is necessary to promote the sustainable and healthy development of intangible cultural heritage protection through continuous improvement of the legal and policy framework, innovative approaches to cultivating practitioners, integration of intangible cultural heritage into contemporary life, and optimization of cross-regional coordination mechanisms.

For countries participating in the BRI, adopting China’s systematic experience in safeguarding ICH offers concrete pathways for transnational cooperation. Initially, the joint establishment of digital archives and knowledge-sharing platforms, informed by China’s expertise in digital documentation and database management (e.g., the National Digital Museum of ICH), can facilitate coordinated digital salvage projects for endangered heritage. By adopting unified metadata standards for resource aggregation and sharing, such platforms would create an open-data infrastructure to support academic research, educational dissemination, and cultural creative industries. Building upon China’s established “Training Program for ICH Bearers,” collaborative initiatives with BRI partners could be developed, including thematic workshops, cross-border mentorship programs, and scholarships for emerging practitioners. Focusing on shared Silk Road heritage—such as sericulture, ceramics, woodcraft, and performing arts—would not only facilitate technical exchange but also reinforce cultural identity and continuity among younger generations across regions. Furthermore, China’s model of “ICH + tourism,” particularly its approach to regional holistic conservation and community-led cultural tourism, holds significant potential for transnational application. Collaborative efforts to design thematic cultural routes—for instance, a “Grassland Nomadic Cul-

tural Heritage Journey” with Central Asian partners or a “Maritime Silk Road Handicrafts Tour” with Southeast Asian countries—could integrate discrete heritage sites into coherent narrative itineraries. This would promote community economic benefits while deepening mutual cultural understanding.

In the realm of policy, China’s ongoing negotiation of the balance between safeguarding and development—including defining the limits of “productive safeguarding” and instituting corrective mechanisms to address over-commercialization—offers valuable insights into risk awareness and governance for BRI countries. Establishing a BRI-focused intergovernmental dialogue mechanism and expert committee on ICH would enable regular sharing of case assessments and joint consultation on common challenges, such as cross-border intellectual property protection and the co-nomination of shared heritage. This would help cultivate regionally-informed safeguarding ethics and cooperation norms grounded in the principle of “consultation, collaboration, and shared benefits.” While China’s experience is inevitably shaped by its specific national context, its reflective practice and adaptive innovations can contribute to a cross-cultural culture of mutual learning and co-evolution. Ultimately, such cooperation would elevate ICH safeguarding from a vehicle for preserving cultural diversity into a practical framework for promoting sustainable community development and enhancing people-to-people bonds among BRI countries.

Notes

¹ The Hezhe Imakan tradition constitutes a vital component of the worldview and historical memory of the Hezhe people in northeastern China. Performed through poetic and prose recitations, it is transmitted through apprenticeship within tribes and families. This tradition serves multiple

functions, including preserving historical memory, ethnic customs, moral teachings, and providing entertainment. However, due to the standardization of school education, the passing of recitation masters, and the migration of young people to urban areas for employment, the practice of Imakan has faced a persistent decline in transmission. Consequently, it was inscribed on the United Nations' List of Intangible Cultural Heritage in Need of Urgent Safeguarding in 2011.

² The Asia-Pacific Centre is a UNESCO Category 2 Centre established in Beijing, China, in 2012 pursuant to an agreement signed between the Chinese government and UNESCO. It is responsible for providing capacity-building training in intangible cultural heritage to countries and regions across the Asia-Pacific region. It refines its training models and content by actively building databases of experts, trainees, and trainers; collecting and organizing relevant information and materials; and participating in seminars at the national, regional, and international levels. Furthermore, through training evaluations and the publication of training outcomes, it supports beneficiary countries in carrying out follow-up activities related to the safeguarding and research of intangible cultural heritage. This has provided intellectual support and technical assistance for intangible cultural heritage protection efforts in Asia-Pacific countries, significantly advanced the implementation of such efforts at the national and regional levels, and assisted in and promoted the global implementation of UNESCO's Intangible Cultural Heritage Capacity-Building Strategy.

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Prof. Dr. Mehmet Celal Özdoğan*

The Responsibility to Preserve and Transmit Anatolia's Cultural Heritage



**He was born in Istanbul on May 30, 1943. He completed his secondary education at the English Boys' High School and then at Robert College in 1963, and began his higher education at the Department of Prehistory in the Faculty of Letters at Istanbul University. In 1970, he began working as an "honorary assistant" at Istanbul University and spent his entire academic career there. Özdoğan was promoted to professor in 1994, assumed the chairmanship of the Department of Prehistory in 2000, and retired in 2010. Özdoğan is a full member of the Turkish Academy of Sciences (TÜBA) (2002 - 2011), a member of the Academy of Sciences (2011), a foreign full member of the National Academy of Sciences (NAS) of the United States (2005), and a member of the American Institute of Archaeology (AIA) and the German Archaeological Institute (DAI).*

“What has been entrusted to us? These are the intrinsic values rooted in this land that must be passed down from the past to the future, as they have shaped our present. They could be a major archaeological site, such as Ephesus, or a shrine in any region. They could also be traces of past events in the region. At the very least, they must be documented and passed on to future generations. However, we must not impose our current perspective or problems onto the past. We must not politicise the past. Science is not the monopoly of any single person. Recognise that the past belongs to no one, and that concentrating knowledge in one person is wrong. We must view it as humanity’s shared knowledge and establish collaborations based on knowledge itself, not on ‘you and me.’”

This interview was conducted with Prof. Dr. Mehmet Celal Özdoğan by Dr. Hande Günözü, a member of the BRIQ Editorial Board.

What do we mean by ‘cultural heritage’? What is the meaning and importance of cultural heritage to us?

Prof. Dr. Mehmet Celal Özdoğan: Well, this is a very broad question. Whose cultural heritage are we referring to when we say ‘cultural heritage’? We should think of heritage as a value we must pass on to future generations, or as something entrusted to us to do so. Cultural heritage can include things related to me, as well as the environment and surroundings in which I live. It can be more general. I believe everything that has enabled us to reach the present, everything left to us by the past that shapes the present, is part of culture. This could be a local monument, Hagia Sophia, the Sultanahmet Mosque, or even the street I live on. But it could also be the accumulated history of my street, dating back to my childhood. It could be my family’s history. I view these as values that the next generation should understand, learn, and pass on - values that

will also enrich them.

The geographical boundaries of our country have only recently been delineated. Consequently, it is imperative to refrain from projecting contemporary political perspectives and comprehension onto bygone eras. Upon posing the question of the provenance of the past in question, it is evident that it pertains to the history of these specific lands. These are the elements entrusted to us on this land. The objects or concepts to which responsibility is entrusted must be determined. These values are deeply rooted in this land’s historical landscape, and they must be carried from the past into the present to shape our future. These could be a major archaeological site such as Ephesus, a shrine in any region, or even traces of a past event in that area. These must be documented and disseminated to future generations. However, it is imperative to refrain from imposing contemporary perspectives or contemporary challenges on bygone eras. It is imperative to refrain from politicising history.

Key Considerations in Documentation Processes

As a conservationist, the subsequent question concerns the domain of movable cultural assets. The presence of readily visible immovable cultural assets facilitates comprehensive documentation efforts. In light of contemporary best practice, what is your opinion on the adequacy of current inventory, registration systems, and documentation efforts for movable cultural assets?

Prof. Dr. Mehmet Celal Özdoğan: It is evident that these phenomena have evolved. A marked distinction emerges when comparing the documentation approach of the preceding generation, my own experience as a student, and the contemporary context. The manner and scope of documentation have also evolved. At the time of this concept's initial emergence, the approach was confined to the documentation of large, monumental structures, that is, structures that were visually striking in both beauty and appeal. Other factors were not taken into consideration. In that era, a rudimentary sketch sufficed as documentation, obviating the need for photographic evidence. As time progressed, a variety of documentation forms emerged, including geographic coordinates. In the contemporary era, a plethora of documentation methods exists. The determination of the correctness or incorrectness of these statements is not a straightforward task. This is due to the perpetual evolution of both the methods and the tools utilised.

Then there's the "cloud." They're uploading everything to the cloud, "up there." Data in the cloud can always be easily deleted or politically erased simply because it doesn't suit someone's interests. That's why it needs to be permanently

documented. It must be documented in a format that future generations can understand, explaining "why it was important, why we preserved it, why we called it Cultural Heritage," not just because it's beautiful or because someone crafted it with great skill, but by highlighting the meaning it carries.

In excavations, we used to draw; sketches were made alongside photographs. We did this in the field. When you do that, you draw by observing the structure of a wall and the connections between its corners, in other words, by thinking it through. Your accumulated knowledge also comes into play. Nowadays, photographers take photos or scans. It looks very sleek and beautiful, but it doesn't convey the information of the drawing made in the field through observation and thought.

But when you look at it from another perspective, we've started to see the past as more vibrant than we ever imagined. While my student years were defined by a past built on selected objects, a different picture is now emerging, one that includes the unselected as well. We need to recognize the value of that, too. For example, look at it through the eyes of a sociologist: you'll be documenting the city you live in today. Your documentation depends on the questions you have in mind. You can't document everything. In other words, whatever you ask, that's what you get. Research into the past is the same; we receive the answer to the question we ask of the past. The questions we ask are also connected to our perspective at that time. So you can't say, "I've documented everything; I know everything." That's not possible.

There's another factor as well: bureaucracy. There's an international framework. There are rules in your region of your country. All of these have their own distinct approaches.

Those Who Monopolize Knowledge for Financial Gain

What consequences have the theft and removal of artifacts, which can be described as the tangible carriers of civilizations across generations, from their original locations led to?

Prof. Dr. Mehmet Celal Özdoğan: We need to distinguish between two different situations. One involves actions taken to gain financial benefit. Let's set that aside. In the traditional perspective, one believes without seeking proof. In other words, you have a past based on legends; you believe in it and do not seek evidence for it. When you begin to seek evidence, a different approach is required - one that asks, "Is it true?" or "Is it really like that?" There are 13 or 14 countries in the world today that are living through the Age of Enlightenment, an era that

prioritizes asking questions over a fixed, established past. The answers to the questions they asked have shaped the field of archaeology as we know it today. If you examine the history of archaeology, you'll see that the arrival of an Assyrian artifact from Mesopotamia in the West for the first time sparked astonishment and excitement because it came from a place where it was never expected. And no one else in the world possessed it. If the Westerners hadn't done so, we wouldn't even know about those cultures today. They might have even vanished. The same applies to Egyptian civilization. From the first Napoleonic campaigns in Egypt or the discoveries in America - things emerging from places no one anticipated... At that time, they took what they found back to their own countries to prove their discoveries and generate excitement. They weren't just collecting archaeological artifacts. They took the fossils, the various animals, and the plants they found with them.



The Sphinx Gate at Alacahöyük, one of the oldest settlements in Central Anatolia, is located in the province of Çorum, Türkiye (Photo: Turkish Museums, 2026).

It's not accurate to call this "theft"; these are the architectural records and stones of the past. In recent years, a process has been underway to return a significant portion of these artifacts to their countries of origin. However, alongside this, there are instances of theft -whether driven by the desire to plunder the world for purely material gain or by the greed of collectors. In other words, some do not contribute to science but instead hoard knowledge for their own benefit or destroy it. We must distinguish between the two.

As scientists, we must study the past. To study the past, we need concrete data. For example, the A burial site in State A, America, is an archaeological site. Are the Native Americans living there today? Or were those Native Americans somewhere else 15,000 years ago? Does it belong to them? That skeleton does not currently belong to the people living there. It is now the common heritage of humanity.

Let's take the example of Türkiye. Atatürk famously argued that the cultural heritage of all civilisations that inhabited these lands belongs to their contemporary inheritors, regardless of ethnic or religious identity. He introduced a culture rooted in the land. Whether in Africa, East Asia, our region, or Europe, the history of the lands we inhabit is humanity's shared cultural heritage.

During my student years in the 1960s, scholars from England to China possessed knowledge and perspectives on every subject, from the Paleolithic era to the Middle Ages. They could view the world's past and its broad outlines on a global scale. Today, archaeology exists in over 200 countries. Everyone focuses on a specific part or detail of their own country. You look at Country A. The leading scholar there is studying only the A period in the northeastern corner of their own country. They have no idea about the rest. Now this situation is also diverting us from the original purpose. Because while we should be looking at the past as a whole, fragmented, disconnected pasts are beginning to emerge.

Göbeklitepe: A Shared Heritage of Humanity

We can't skip Göbeklitepe, professor. It's very popular. And it's important, too... Actually, the region as a whole is very important, but Göbeklitepe has become quite popular lately.

Prof. Dr. Mehmet Celal Özdoğan: There's something extraordinary there, in that culture. They're exceptionally well-preserved. Why are they so well-preserved? They're better preserved than we've ever seen anywhere or in any period. First, they were buried during that period. Second, all of these are on land unsuitable for agriculture. They're all on a limestone plateau. Places suitable for hunting. As soon as they transitioned to agriculture, they abandoned them and moved on. Since no one settled there again, they've been preserved as fossils, just as they were between 8,000 and 7,500 years ago.

How did Göbeklitepe become famous? The first surface survey at Göbeklitepe began in 1963. Then came Klaus Schmidt in the 1990s... At first, no one was interested. But everything was there in the first season, T-shaped stones and statues alike. The first traces of that culture were also found in the 1964 Çayönü excavation. It didn't capture anyone's attention as much as it does today. When did it start attracting attention? After National Geographic featured it on the cover... People in Ankara, our people, and the villagers living there all got excited. And the Göbeklitepe phenomenon exploded. If it weren't for National Geographic's popularization, no one would have provided the funds to excavate Göbeklitepe, nor would anyone in Europe have been interested. No effort was being made to protect it. The bureaucracy in Ankara didn't care at all. In fact, some were even wondering, "How can we stop this?" It was only through the extraordinary efforts

of a museum director like Adnan Mısır (then director of the Şanlıurfa Museum) that the excavation permit was secured.

The preservation of this site is Türkiye's responsibility. But it is the common heritage of all humanity. It represents a pivotal event in which the foundations of everything from the transition to agriculture to village life to urbanization to the rise of empires and states were laid, beginning with the laws of inheritance. For this reason, we must view it as the true cornerstone of modern civilization. I'm not just talking about Göbeklitepe, but the entire cultural region.

There are two responsibilities here: preserving it and uncovering that knowledge, as well as contributing to science and humanity. This is happening at the international level. The number of participating countries is steadily increasing. And experts from various scientific disciplines are also joining in. The current project is structured correctly. At present, it is limited to the Taştepe sites, that is, those around Urfa, but in reality, that cultural sphere encompasses the entire Euphrates-Tigris Basin. It needs to evolve into an academy where interdisciplinary experts come together to share knowledge, discuss, and develop new methods collaboratively.

Information Should Be Shared Internationally

How can developed nations collaborate to preserve cultural heritage?

Prof. Dr. Mehmet Celal Özdoğan: The best example is something like what's happening in Şanlıurfa. Science is not the monopoly of any single person. You must realize that the past belongs to no one, and that concentrating knowledge in a single hand is wrong. Knowledge belongs to science. There is so

much work to be done, international, interdisciplinary, that scientists can share ... There's no need for anyone to be jealous. There's also this tendency, common among archaeologists. They don't show anyone what they've unearthed until they've published it. Yet, I cannot claim exclusive ownership of what emerges from my excavation. My interpretation is my own. I won't hide from anyone what a craftsman made 8,000 years ago. Hagia Sophia stands there—can't you look at it and write a new book? You can. If someone can interpret it better than I can, let them write. I have shared everything that came out of my excavation with everyone. Considering it humanity's shared knowledge, collaborations built on that foundation, not "you versus me," but knowledge-focused collaborations, should be established. Right now, many tools and developers around the world are developing new methods. Methods I couldn't even imagine are emerging.

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The preservation of this site is Türkiye's responsibility. But it is the common heritage of all humanity.

Some things are going very well right now. Take the Shanghai Archeology Forum, for example. From what I can see, it's one of the best forums where the most sound ideas in the world are developed. It used to be held every two years. I'm involved in it: every year, about 150 participants from roughly 40 countries. At one point, the European Association of Archaeologists used to organize it. Then it became a bit more politicized. We need to participate in these forums and share knowledge. Knowledge does not belong to us. Knowledge is an inheritance from the past. It must be shared and utilized. 🌸

Director of the Lev Gumilev Moscow Center **Pavel Zarifullin**

The Legacy of Plundered Scythian Gold



**Pavel Vyacheslavovich Zarifullin was born in 1977 in Kazan. He is a lawyer and historian by education. Over the years, he led Eurasian humanitarian missions in Kosovo, South Ossetia (during the war), Transnistria, Crimea (during the peninsula's reunification), Afghanistan, and Ukraine. Zarifullin, who has been Director of the Lev Gumilev Moscow Center since 2010, founded the International Movement "New Scythians." He is a specialist in sacred geography; he has led dozens of expeditions to sacred "places of power" in Inner Eurasia: Yakutia, Mongolia, Tuva, Pakistan, Afghanistan, Iran, Tajikistan, the Caucasus, the Russian North, Siberia, and the Far East. Zarifullin, as a theorist of Eurasianism and Scythianism, is an author of many books and essays published in both Russian and international media. He was awarded the Medal of the Order "For Merit to the Fatherland," 2nd Class, for promoting Russia's interests abroad, and he was also awarded orders, medals, and commemorative badges of Afghanistan, Kazakhstan, Azerbaijan, and the Republic of Sakha (Yakutia).*

“If we remember that our movement truly has a slogan: ‘new Scythians,’ the Scythian gold within each of us—then I think it will be much easier to defend this gold while we understand that it should heal us, heal our peoples, strengthen our peoples, the peoples of Russia, the Slavs, the Turks, the Ukrainians, the Caucasians, all those peoples who believe they descend from the Scythians. We must remember who we are, remember, as Alexander Blok, our great Russian poet, said, ‘Yes, Scythian and we,’ that we all descend from this unique civilization. When we remember this, this gold will not disappear from us, and we will cling to it so tightly and cherish it so much that no one will steal it from us.”

**This interview with Pavel Zarifullin was conducted
by Ece Perinçek, editor of BRIQ.**

WE DISCUSSED THE SCYTHIAN GOLD AND Bactrian treasure trove—considered a prime example of the West’s plundering of the world’s cultural heritage—with Pavel Zarifullin, director of the Lev Gumilev Center in Moscow. Zarifullin has been researching this topic for many

years and does not view it merely as a crime of theft. According to Zarifullin, the Scythians are among the most important roots of Eurasian civilizations, and the West is not only plundering their cultural heritage but also trying to eradicate these roots.

The Common Ancestor of the Peoples of Eurasia: The Scythians

As an example of the looting of cultural heritage, why are you researching Bactrian and Scythian gold? What is the significance of these treasures?

Pavel Zarifullin: Firstly, I wouldn't distinguish between Bactrian gold and Scythian gold, because they are, after all, one civilization. The Scythian gold animal style emerged around 1000 BC, three thousand years ago. And it developed within the cultures of the Scythian peoples and related peoples, essentially dialects of the Scythian language.

Their culture is incomparable with anything; that is, before them, there were the Aryans who rode chariots. The country of cities in the southern Urals, Arkaim, wonderful metallurgists, remarkable, but that level of Scythian inventions... That level of their exquisite metallurgy, and forging, and worldview, and philosophy... And in general, these captivating golden Scythian items, which are even more elegant than the Egyptian ones, are dynamic and elegant. The Egyptian ones are big and bulky, while the Scythian ones are elegant. They are so alive, practically living pictures of a dynamic universe. So neither before nor after them was there anything like them. Therefore, many people consider themselves descendants of the Scythians, as identifying with them has become very fashionable. Even for the Saxons in the west! Many people across Eurasia believe they descend from the Scythians. The Slavs, the Ugra-fins, the Turks, the Mongols, the Persians, the Iranians, the Pomirs, and even the Indian Kshatri... They all believe they descend from the Scythians. So, they are a truly unique people. I have been studying them with great interest for decades. It's a whole universe, and once you get into it, you can't leave it.

The History of the Stealing of the Bactrian Treasure

Can you tell us more about the Bactrian Treasure and the process of its discovery?

Pavel Zarifullin: The "Bactrian Gold" is a collection of gold artifacts discovered in 1978 during excavations of Kushan royal tombs dating back to the 1st century BC in the Tillya Tepe region of northern Afghanistan, which means "Golden Hill". The excavations were carried out by a joint Soviet-Afghan archaeological expedition led by Viktor Ivanovich Sarianidi, a legend of Soviet and Russian archaeology. On ancient maps, what is now northern Afghanistan and southern Tajikistan was called Bactria. Hence, the treasure was named the "Bactrian Treasure". Approximately three thousand gold objects were discovered in each of the seven tombs. In total, around 20,000 unique gold objects were found: gold jewelry, "animal-style" gold weapons, and many more...

These were the astonishing treasures of the Kushan Empire kings at the beginning of the 1st millennium BC. Descended from the nomadic Scythians, the Kushan kings established a vast state comparable in size to ancient Rome and China. Hellenistic deities, Zoroastrianism, and Buddhism coexisted harmoniously within this state. The Kushans also favored the Scythian "animal style" in their artifacts, and Soviet archaeologists have unearthed magnificent jewelry from the Kushan rulers.

The discovered gold pieces were placed in the Kabul National Museum. At that time, there was a fervent friendship between the USSR and Afghanistan. Babrak Karmal, the then leader of Afghanistan, whom Brezhnev called his best friend, regularly visited Moscow. Because of this warm friendship, the collection was logically donated to Afghanistan instead. Thus, the collection remained peacefully in the



A Scythian artifact made of gold and agate, dating to approximately the 4th–3rd centuries BCE, on display at the Metropolitan Museum of Art in the United States (The Met, n.d.).

museum throughout the entire period of the limited Soviet presence in Afghanistan.

In 1989, following the withdrawal of the 40th Army from the country and amid the crisis, under the orders of then-President of the Democratic Republic of Afghanistan, Mohammed Najibullah, the gold items were moved to the vault of the Central Bank of Afghanistan. This was no ordinary safe; it was a massive, armored safe with advanced security features.

What happened next was a true detective story. After Najibullah's overthrow in 1992, the keys to the vault were handed over to five trusted Afghan gentlemen from prominent families, including Omar Khan Masoudi, director of the National Museum. The names of the others are unknown. To open the safe, all five keys had to be inserted into the lock at the same time, just like in the movie “The Fifth Ele-

ment”. The guards agreed that if one of them died, their key would pass to that person's eldest child. After seizing Kabul in 1996, the Taliban tried every means to obtain information about the treasury's custodians from bank employees, but despite numerous threats, they were unsuccessful.

American intelligence agents were much luckier; after the Americans arrived in Kabul in October 2001, they quickly discovered the treasure's whereabouts. In 2003, the location of the Bactrian treasure was officially revealed. A year later, the Americans finally found the keepers of the keys and gained access to the unique Afghan antiquities. Even the great Russian archaeologist Viktor Sarianidi, who made the discovery, was invited to open the safe and verify the artifacts' authenticity. Over the next two years, the Bactrian Treasure was carefully examined and inventoried.

By the mid-2000s, Afghanistan was almost completely cleared of the Taliban, but the gold collection was allegedly sent abroad for museum display. From December 2006 to April 2007, they were exhibited in Paris under the title “Afghanistan, Rediscovered Treasures.” These unique artifacts subsequently traveled to museums in various European capitals, as well as in Canada and Australia, but, for unknown reasons, they miraculously arrived in the United States rather than back in liberated Afghanistan. Their current location and ultimate fate are only approximately known.

Most likely, they are located in the same place as the 22 tons of gold from the Central Bank of Afghanistan that is “safely stored” at the Federal Reserve Bank of New York. These gold bars were used as collateral for Kabul’s debt obligations. The US has no plans to hand them over to anyone at this time.

The Bactrian Treasure is estimated to be worth billions of dollars, but it is absolutely priceless. I want to point out that this is royal “ritual” gold with the power to improve and influence people’s destinies.

How were the Scythian Gold Artifacts Stolen?

How were the Scythian gold artifacts stolen?

Pavel Zarifullin: Another element that adds mystery and illuminates our story is a similar incident that occurred in 2014, when, under the initiative of then-Ukrainian Prime Minister Arseniy Yatsenyuk, Scythian gold from Kyiv museums was taken to the United States under the pretext of a museum exhibition and subsequently disappeared there.

In February 2014, a collection of Scythian gold was taken from Crimea to Amsterdam,

Netherlands, where it was effectively stolen. On March 7, 2014, news spread worldwide that Arseniy Yatsenyuk smuggled gold from Kyiv museums to the United States, secured by American loans. We investigated for a long time who was behind it, what kind of organization was involved, and conducted a special investigation together with Komsomolskaya Pravda. Junsei Terasawa, an agent of the American intelligence service and the Elks Club, worked in Chechnya and Tajikistan during the civil war. He was also involved in Maidan in 2014. There, he officially worked for the Geneva Peace Institute through Viktor Yushchenko’s wife, Kateryna Yushchenko. He met Turchynov and Arseniy Yatsenyuk, who led the Maidan protests and seized control of Ukraine in 2014. With their help, in 2014, he smuggled a large amount of gold out of Kyiv to the United States.

The American organization behind all this is: ‘The Bull Moose Club’. So, what is this “Bull Moose Club,” where did it come from, and what is its purpose? In the modern world, the existence of various Masonic and Paramasonic clubs is no secret. Some adhere to rituals dating back to the Middle Ages; members wear special costumes and perform mysterious ceremonies for purposes known only to themselves. Others consist of clubs of the greats, the “masters” of this world; for example, the Bilderberg Group, to which the Rockefellers and all their colleagues and friends belong. The “geniuses” gather in the Bilderberg Group to plan ways to “save humanity,” which means enslaving and exploiting humanity for their own purposes. For decades, the club’s leaders have been acquiring the spiritual and material heritage of the Scythians, Bactrians, and other Eurasian peoples from antique markets around the world.

The Elks Club, like the Bull Moose Club, has a

long history in the United States. Scythian artifacts were brought to the United States and continue to be brought to this day: gold, akinakes, mirrors, harnesses, royal crowns, pectorals, and other items of everyday Scythian life. The Elks Club has been involved in this for nearly a hundred years.

The club's members included some ironic figures from the world of culture. One of them was Bruce Humberstone, the famous director of "Sun Valley Serenade." If you recall, the main character wears a deer-patterned sweater. Following the film's release and popularity, sweaters featuring deer and a North Star motif became a global fashion trend and have remained so ever since.

We must Understand the True Treasure We Possess, which is Who We are

Finally, what steps should governments take regarding these two treasures?

Pavel Zarifullin: What steps are being taken to counter the Americans and Anglo-Saxons stealing gold from the Scythians, Sarmatians, Kushans, and Bactrians—yes, stealing it and storing it in their own coffers, and the Europeans importing it into their museums, something they've been doing for hundreds of years? They might say, "Well, we won't allow it; we'll force our government to monitor this gold."

These have ritualistic significance for them, and they will export them through black-market dealers and some international fraudsters; they will actively participate in this business.

Here, I would appeal to our governments—to the governments of Russia, Kazakhstan, Afghanistan, and Türkiye. But at this point, we ourselves must understand what treasures we possess.

Take Egypt, for example: With the gold of the

pharaohs, they essentially created a new nation, even though the pharaohs had no connection whatsoever to the Arabs or the Philaeans of Egypt. They created a gigantic museum, glorifying that civilization to infinity, for the universe to see. The whole world goes to the museums in Cairo and takes selfies there.

We have nothing similar in Eurasia. Although indeed, central Eurasia is the birthplace of modern civilization in general, both in terms of the birth of philosophy and world religions, which descended from the Scythian prophets, and in terms of the birth of technology in general, the wheel, the domestication of the horse, and the birth of war chariots.

Unfortunately, the leadership of Eurasian countries, especially Russia—since I live in Russia and worry about Russia—remembers this very poorly.

If we remember that our movement truly has a slogan: "new Scythians!," the Scythian gold within each of us—then I think it will be much easier to defend this gold while we understand that it should heal us, heal our peoples, strengthen our peoples, the peoples of Russia, the Slavs, the Turks, the Ukrainians, the Caucasians, all those peoples who believe they descend from the Scythians. We must remember who we are, remember, as Alexander Blok, our great Russian poet, said, "Yes, Scythian and we," that we all descend from this unique civilization. When we remember this, this gold will not disappear from us, and we will cling to it so tightly and cherish it so much that no one will steal it from us.

It will work not for Masonic clubs, not for their rituals, not for black magic, but for the brotherhood of the peoples of Eurasia. Therefore, we must first and foremost turn to our government, to ourselves, to remember who we are, that we are all Scythians. When we remember this, the gold will return to us. 🌸

Institutional Balancing in Mongolia's Third Neighbor Diplomacy: Engagement with the Shanghai Cooperation Organization



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ABSTRACT

Mongolia, as a landlocked state committed to permanent neutrality, has strategically transformed its Third Neighbor Diplomacy policy into a mechanism for institutional balancing within the Shanghai Cooperation Organization (SCO). This article contends that Mongolia's engagement is motivated by a dual logic of hedging and leveraging: it aims to reduce strategic and economic dependence on China and Russia while utilizing the SCO platform to enhance the value of its geographic location and resource endowments. Through selective participation, agenda reframing, and institutional nesting, Mongolia actively shapes its observer status to maximize autonomy and influence. The study concludes that Mongolia's calculated and innovative approach provides a compelling model for how secondary states can convert multilateral institutions into strategic assets, thereby advancing both the theory of institutional balancing and the practice of small-state diplomacy in contested regions.

Keywords: hedging, leveraging, Mongolia, Shanghai Cooperation Organization, Third Neighbor Diplomacy.

Introduction

THE SHANGHAI FIVE, COMPRISING CHINA, Russia, Kyrgyzstan, Kazakhstan, and Tajikistan, was established in 1996 to enhance border security among its members. The disintegration of the Soviet Union in the 1990s prompted China to seek common ground with the successor states. In 2001, following the inclusion of Uzbekistan, it was officially renamed as the "Shanghai Cooperation Organization" (SCO), with its objectives expanding beyond mere border issues. The SCO encompasses the entire domain where global

geopolitical events and intricate processes unfold, rather than focusing solely on economic cooperation or integration. It encompasses more than 40% of the global population and accounts for 24.2% of the worldwide GDP (Nadin, Nijhar, & Mami, 2022). The Development Strategy to 2025 asserts that the SCO will not operate merely as a military or economic entity, but aims to enhance its role as a multifaceted regional organization, not intended to function as a military and political bloc or an economic integration association with supranational governing bodies (SCO, 2015).

Mongolia's status as a landlocked country between major geopolitical powers has resulted in limited investment from third-party countries. This geographic reality subjects Mongolia to persistent geopolitical pressures and a delicate balance of influence. Analysis of the relationships among China, Russia, and Mongolia demonstrates that China wields considerable economic influence over Mongolia. In 2024, 91.3% of Mongolia's exports were directed to China, primarily consisting of key raw commodities such as coal and copper, which are vital to Mongolia's economy (Xinhua News, 2025). Additionally, most of Mongolia's trade with other countries transits through Chinese territory, affording China strategic leverage over borders, customs, and railway ports. Russia maintains significant control over

Mongolia's infrastructure and energy supply, with over 90 percent of consumer fuels, including gasoline and diesel, imported from Russia. Disruptions or price surges in Russia could therefore present socio-economic challenges for Mongolia. The country's railway infrastructure, constructed to Soviet-era standards, further reinforces its strategic dependence. While China and Russia are leading members of the SCO, Mongolia participates as an observer state. As a landlocked and permanently neutral nation, Mongolia seeks security assurances from both neighbors while pursuing its Third Neighbor Diplomacy strategy. This context raises the central research question: What is the rationale for Mongolia's engagement in the SCO, an organization dominated by China and Russia?



Caught between major geopolitical powers and landlocked, Mongolia has been continually exposed to geopolitical pressures and a delicate balance of influence (Map: Mapsland, t.y.).

Literature Review

Given the limitations of the Third Neighbor Diplomacy framework, there is a robust theoretical foundation for Mongolia's deliberate ambiguity in foreign relations, balancing cooperation and caution without fully aligning with major powers. Cheng-Chwee Kuik argues that hedging enables small states to pursue multiple forms of external action—cooperation and balancing—thus preserving a wide range of policy options amid increasing international uncertainty (Kuik, 2021). Similarly, Evelyn Goh defines hedging as a combination of strategies designed to address situations where neither balancing, bandwagoning, nor neutrality yields optimal outcomes (Telci & Rakipoğlu, 2021). For Mongolia, which prioritizes strong political and economic relations with Russia and China while seeking deeper partnerships with advanced third neighbors, hedging theory provides a valuable analytical framework for understanding its adaptive, risk-calculating foreign policy, moving beyond descriptive interpretations of the Third Neighbor Diplomacy policy.

Hedging has been defined as the means by which small and middle powers preserve their autonomy amid the rivalry of great powers. Hedging encompasses both engagement and counterbalancing. Kuik portrays the theory as an “insurance-seeking” strategy, in which states simultaneously adhere to diverse policies, cooperating with a superpower to gain economic or political benefits while preparing security and diplomatic measures to mitigate potential risks ahead (Kuik, 2025). In an anarchic international system, this policy minimizes the chances of over-commitment to one side for small states, especially when great powers' intentions remain unclear.

Hedging is not limited to one straightforward policy. Walt conducted case studies of alliance formation and eventually asserted that international al-

liances were either “balancing” or “bandwagoning” (Walt, 1987). While a balancing act involves the combination of less powerful states to neutralize a dominant power or coalition, bandwagoning involves fully siding with a threatening power. Figiaconi argues that this hardened realist perspective is applied only to the supremacy of powerful countries, neglecting how small and medium nations can leverage their own capabilities amid the clouds of their specific strategies and systemic pressures to survive (Figiaconi, 2025). Unlike traditional theories, hedging involves engaging and resisting together. Goh argues that hedging is an appropriate mechanism of governance in Southeast Asian countries, where smaller states must maintain normal relations with China for economic growth while strengthening cooperative links with the United States for security (Goh, 2005). In the context of Southeast Asia and China, Kuik identified three crucial policies to maximize the benefits for small and medium-sized nations (Kuik & Rozman, 2015). The first and foremost is “economic pragmatism”, a policy aimed at taking a share of the relationship through economic means with a rising power. Secondly, maintaining diplomatic closeness with a rising power by taking part in multiple bilateral and multilateral engagements. It is to open several diplomatic channels to raise its position to a better stage, and he named this policy “binding-engagement”. Lastly, the limited-bandwagoning policy is intended to create political benefits by building a partnership with a great power, but only to a limited extent through selective acts. Subsequent scholars furthered this logic, built on the rise of China and the US's traditional dominance in Asia: Lim and Cooper described hedging as a set of deliberate, calculated acts, including contradictory responses to multiple sides with different geopolitical aims, simultaneously to preserve maneuverability amid uncertainty (Lim & Cooper, 2015).

Hedging context itself is always debatable. Distinct features of hedging, the forms of alignment, and their coherence are part of the hedging study. Korolev has acknowledged the similarities between these two domains, but it is somewhat difficult to clarify the overlapping elements between them and other closely related terms in state behavior. The nature of the hedging term is broadly gauged with “indirect” or “soft balancing”, “limited bandwagoning”, “realist-style balancing”, “low-intensity balancing”, or simply “balancing” (Figiaconi, 2025). Taking a conceptual approach based on principles and logic rather than Kuik’s policies and actions, he identified hedging features as relative equidistancing and simultaneity, opposing and counteracting measures, and diversification of policy options (Korolev, 2024). He argues that hedging is valued primarily at its zenith under conditions of structural unpredictability, and that states may have the right to shift their foreign policy toward a simpler, more straightforward course. Koga conceptualizes hedging as a middle-level balancing and bandwagoning strategy, particularly activated during power shifts for secondary-leveled states (Koga, 2018). Others stand firmly on the belief that there should be a clear distinction between hedging and balancing, as well as other similar theories, rather than overlapping policies. According to Haacke and Ciorciari, even if a state is in a hostile condition and becomes involved in military resistance against a particular power, it can still engage in hedging in both political and economic spheres (Haacke & Ciorciari, 2022). It means

these nations take a significant share of the benefits from their relationship. Haacke and others have argued that hedging is about organizing the proper placement of vital survival risks, and thus making the term somewhat different from balancing and bandwagoning. Regarding the inner context of hedging, González-Pujol distinguished economic, political, and military hedging and attributed them to inter-field and intra-field contradictions (González-Pujol, 2024). The former refers to a condition in which a state cooperates with a great power in a particular field while remaining competitive in another area of foreign policy. The latter is revealed in a setup in which a state pursues a policy that includes both cooperative and resistant elements toward another country in the same area. These opposing behaviors are intentional actions taken by states to manage hedging flexibility.

Given its landlocked position between major powers, Mongolia collaborates with its neighbors on trade and infrastructure while strengthening “Third Neighbor” ties with the United States, Japan, and Europe.

Economic activity to enhance secondary states’ hedging is a demanded part of the theory. Lim and Mukherjee question the reasoning

behind hedging that even without an obvious threat to a state, it can formulate the foreign window in accordance with a hedging approach due to economic gains, together with the usual discussions of the uncertainty nature in international relations in the South Asian range (the cases of Maldives and Sri-Lanka) (Lim & Mukherjee, 2019). The authors admit that there are cases in which small states trade their independence for a powerful country and, in return, receive a lucrative share of monetary benefits; however, at this point, a state's vulnerability becomes an issue. Telci and Rakipoğlu (2021) expand the economic dimension of hedging, arguing that maximizing economic opportunities to build internal capacity is a core element of hedging in small states, involving the development of multiple partnerships with various actors. As small states lack strong military and economic resources, they are likely to engage in hedging behavior. In Kuwait's case, economic activity is as important as diplomatic and military measures for managing its dependency and autonomy.

Effective implementation of such a policy requires ensuring that one set of policies does not undermine another. Critics argue that hedging behavior may ultimately create ambiguity, potentially weakening alliances or making small states appear unreliable, especially when major powers pressure them to align. Kuik contends that hedging is not a permanent strategy but a pragmatic approach that tends to persist longer than traditional alliance-building theories. The effectiveness

of this approach for small states depends on precise calibration between cooperation and counterbalancing (Kuik, 2023). Mongolia's foreign policy exhibits significant hedging characteristics. Given its landlocked position between major powers, Mongolia collaborates with its neighbors on trade and infrastructure while strengthening "Third Neighbor" ties with the United States, Japan, and Europe. By eschewing formal alliances, Mongolia favors multilateral engagement and diversification of diplomatic and security relationships with advanced countries and international organizations, while maintaining stable relations with China and Russia. This approach exemplifies the core feature of hedging—maintaining a low profile in formal alliances while preserving flexibility to protect sovereignty and autonomy in a volatile geopolitical environment. Despite this, Mongolia is often overlooked in hedging studies, which predominantly focus on Southeast Asian countries in the context of China's rise.

These research gaps necessitate a reinterpretation of Mongolia's foreign policy behavior within the broader context of international uncertainty, employing a more rigorous theoretical framework. Despite Mongolia's unique external environment and strategic location, it remains underexplored in hedging scholarship (Hlaváček & Sanc, 2022). This study addresses this gap by applying hedging theory to analyze Mongolia's Third Neighbor Diplomacy policy as a proactive institutional balancing strategy designed to mitigate risk and maximize interests through multilateral platforms.

Institutional Balancing under the Third Neighbor Diplomacy Policy

Mongolia's Third Neighbor Diplomacy policy extends beyond bilateral diplomacy and is best understood as institutional balancing within multilateral organizations such as the SCO. This approach is defined by two complementary operational logics: hedging, which aims to mitigate strategic and economic risks associated with overdependence, and leveraging, which seeks to enhance the value and influence of Mongolia's geopolitical and economic assets. This dual-logic framework offers a coherent explanation for Mongolia's calculated and proactive institutional engagement.

Evolution of the Third Neighbor Diplomacy Policy

The end of the bipolar era did not facilitate a smooth path for Mongolia's foreign relations. It brought more complex issues and necessitated proper maneuvering in an increasingly multi-directional environment amid newly emerging multipolar competition and global uncertainty (Dashdorj, 2003). In this uncertain setting, Mongolia's foreign policy priorities often lie in the flexible components of hedging, a strategy of small states that involves calculating risks and seizing opportunities by cooperating with multiple allies while not fully aligning with any of them (Kuik, 2021). Mongolia's foreign policy hinges on two critical pillars: fostering positive ties with Russia and China, alongside the US and other advanced Western European countries, as well as with significant Asian powers like South Korea and Japan (Hlaváček & Sanc, 2022). Mongolia is reluctant to accept a full-fledged alliance

with its two neighbors or the Western sphere. Instead, the country uses multiple pragmatic instruments, including balancing, managing the dependence ratio equally across multiple allies, and diversifying its trade partners, and acts selectively in various fields.

The Soviet withdrawal of its troops in December 1992 revealed Mongolia's strategic vulnerabilities: its dependence on Soviet assistance, its limited diplomatic ties beyond the socialist bloc, and its lack of diversified security partnerships (Bat-Erdene, 2021). Mongolia experienced a severe economic downturn following the collapse of the Soviet Union. The only political patron of Mongolia could no longer assist, and the country entered a new era with zero awareness of free-market and open policies, since it had been isolated from the world in the 20th century. The new phenomenon forced Mongolia to bear the full weight of its geography, governance, and politics on its own. During its new challenge to establish a new type of relationship with Russia and China, the new Mongolia signed the "Treaty on Friendly Relations and Cooperation" with Russia in 1993 (Guudai, 2014) and the "Treaty on Promoting Friendship and Cooperation" with China in 1994 (Porter, 2009). In the same year, three important nationwide documents were formulated by the officials: the National Security Concept (NSC), the Foreign Policy Concept, and the Military Doctrine (Soni, 2018).

Between 1996 and 2000, the Democratic Party of Mongolia came to power after the parliamentary election and sought to intensify Mongolia's reforms by leveraging globalization (Dashdorj, 2003). One of the party's leaders, Enkhsaikhan, wrote that in the 20th century, the major powers conquered the small ones, but the one that moves quickly is the winner in the next century,



“The Soviet withdrawal of its troops in December 1992 revealed Mongolia’s strategic vulnerabilities”.
Memorial complex “Glory to the Russian Soldier” in Choir, a city in east-central Mongolia
(Photo: Sanghee Liu/Sydney Morning Herald, 2023).

outpacing slow runners in world affairs. Mongolia sought to reduce its reliance on its two neighbors by actively integrating into global economic and institutional networks (Dashdorj, 2003). Mongolia’s leading policymakers have recognized the urgency of creating and strengthening a global system with a real network of interests for new distant partners, beyond Russia and China, on Mongolian “soil” (Tserenpil, 1998). This environment enabled Ulaanbaatar to diversify beyond its traditional reliance on Russia and to navigate its complex relationship with rapidly rising China cautiously.

James Baker, the former U.S. Secretary of State, was the pioneer to mention the notion of

“Third Neighbor” during his state visit to Mongolia in 1990, declaring the United States is a third neighbor of Mongolia, so that Mongolia can build intense cooperation and close partnership with all of three major powers without interfering to dispute Mongolia’s relationship with its adjacent nations (Sanallkhundev, 2016). Based on Baker’s comments on Mongolia’s foreign policy, one may understand the Third Neighbor Diplomacy policy as a strategy to develop political, economic, and security relations with countries beyond its two immediate neighbors, Russia and China, thereby diversifying external partnerships and preserving strategic autonomy.

The secondary direction of Mongolia's foreign policy is "...developing friendly relations with highly developed countries of the West and East, such as the United States of America, Japan, and the Federal Republic of Germany. At the same time, it will also pursue a policy aimed at promoting friendly relations with such countries as India, the Republic of Korea, Thailand, Singapore, Türkiye, Denmark, the Netherlands, Finland, Austria, Sweden, Switzerland, and at creating and bringing to an appropriate level their economic and other interests in Mongolia" (State Great Khural of Mongolia, 2011). Considering the secondary direction, Mongolia focused on strengthening bilateral ties with advanced democratic states. The policy has gradually evolved from a primarily bilateral balancing mechanism into a broader, multidimensional strategy that later incorporates multilateral diplomacy and institutional engagement. The term Third Neighbor Diplomacy has arisen from national security, the first-ever concern of a country like Mongolia, situated between big powers with an incapable military and a low population, and it is reflected in the 2010's "NSC of Mongolia". The updated document shifted from a purely military focus to a multi-dimensional approach that links national survival to economic and environmental stability.

Mongolia's foreign policy towards highly developed nations and international organizations is clearly reflected in the 2010 version of the NSC. The NSC outlines the country's external priorities and worldview and provides a formal expression of the shift from geographical balancing toward value-based diplomacy and, ultimately, to institutional engagement. Early formulations, in Article 3.1.1.5 of the NSC, focused on maintaining effective relations with countries, such as the United States, Japan, and South Korea, which are labeled

as "Third Neighbors" for crucial balancing (Unified Legal Information System, 2010).

The Third Neighbor Diplomacy policy has now strategically evolved, reoriented from securing bilateral guarantees with states such as the United States, Japan, and South Korea to actively instrumentalizing multilateral institutions, thereby constructing an "institutional third neighbor" network with the SCO as a core component.

The NSC increasingly upholds liberal democratic principles—human rights, free markets, and the rule of law—as the normative roots for foreign engagement. This first focus on geographically distant democratic partners is elaborated in the NSC's early sections. In Article 3.1.1.2 of the NSC, it is written that "The basic methods for ensuring Mongolia's independence and sovereignty shall be political and diplomatic actions. Accordingly, a multi-pillared foreign policy directed towards building active relationships and cooperation with foreign states and international institutions shall be implemented" (Unified Legal Information System, 2010). Mongolia's Third Neighbor Diplomacy policy has evolved from a geographic balancing tool into a more complex and layered foreign policy strategy. Mongolia's foreign policy is to develop equal cooperation

with countries such as the United States, Western Europe, Japan, and South Korea, without disrupting the system of friendship and cooperation established with its two neighbors. Thus, it can be said that initially, it was centered on building ties with these countries to counterbalance the potential pressure from overwhelming influence by China and Russia. In Article 3.1.1.5 of the NSC, Mongolia's attribution to third neighbor countries was clearly indicated as it says, "pursuant to a 'Third Neighbor' strategy, bilateral and multilateral cooperation with highly developed democracies in political, economic, cultural and humanitarian affairs shall be undertaken" (Unified Legal Information System, 2010)

In June 2022, the Office of the National Security Council of Mongolia drafted a comprehensive amendment to the existing 2010 framework, while the foundational document remains the 2010 NSC. The revision addressed a rapidly changing external environment—specifically the impacts of the Russia-Ukraine war and shifting dynamics in East Asia—and internal issues, such as public distrust in governance. The Third Neighbor Diplomacy policy has now strategically evolved, reoriented from securing bilateral guarantees with states such as the United States, Japan, and South Korea to actively instrumentalizing multilateral institutions, thereby constructing an "institutional third neighbor" network with the SCO as a core component.

Dual Behavioral Logic Hedging and Leveraging

According to Ciorciari and Haacke (2019), although hedging has been widely applied in international relations, its diverse explanations and definitions across scholars make it a loose

and inconsistent concept. It is also common for scholars to include more than one of these definitions in their articles. It indicates that hedging conditions can be adjusted from time to time, depending on the situation the state is facing. In this research, hedging is conceptualized as a strategy that encompasses diverse approaches and policy flexibility, intended to gain economic and political benefits from relations with major powers while maintaining alternative partnerships to avoid overdependence on a single power. A hedging strategy does not mean taking an indecisive or neutral stance; rather, it is a preventive measure to minimize potential structural risks in the future. In Mongolia's context, hedging unfolds as cooperative relations with the SCO, led by China and Russia, alongside simultaneous efforts to secure additional security, diplomatic, and economic endorsements from "Third Neighbor" partners, and through selective institutional balancing.

States are most likely to adopt hedging behavior when confronted with a long-term threat that is highly concerning but does not pose an immediate security challenge (Kuik, 2008). This approach is particularly persuasive for small and middle powers, which derive substantial economic benefits from trade with major powers but seek to avoid full political alignment. Furthermore, as great-power rivalry intensifies and the future distribution of power remains uncertain, governments often prioritize policy flexibility over adopting definitive strategies such as balancing or bandwagoning (Goh, 2006). In these contexts, hedging emerges as a rational strategy, offering a framework for evaluating long-term risks and advancing national interests without antagonizing dominant neighbors.

Mongolia's institutional engagement with the SCO is underpinned by a twofold rationale: to mitigate risks through hedging and to enhance leverage (Kuik, 2025). The rationale for risk mitigation through hedging is inherently defensive and preventive, driven by the need to address the significant vulnerabilities in Mongolia's geopolitical and economic context. Mongolia, a landlocked nation bordered solely by the significant powers of China and Russia, faces the inherent risks of strategic dependency and coercion. The hedging strategy leverages institutional involvement to diversify risk and enhance resilience (Kuik & Rozman, 2015). In the realm of security, participating in SCO-led efforts focused on non-traditional security issues—such as counter-terrorism, transnational crime, and cybersecurity (Maduz, 2018) —enables Ulaanbaatar to build professional trust and establish reliable communication channels with its neighbors. This functions not as a conventional military alliance but as an essential confidence-building mechanism, establishing a procedural “safety net” that stabilizes its immediate security context and enhances the credibility of its enduring neutrality (Kuik & Rozman, 2015). This rationale is evident in efforts to prevent excessive reliance on any single transit corridor or market. Mongolia aims to legitimize and enhance the diversity of its export and import lines by advocating for its “Steppe Road” program within broader regional connectivity discussions, including the SCO framework (Dulbaa, 2018). This institutional initiative for multimodal connectivity is a strategic endeavor to diminish its vulnerability to economic pressures and logistical constraints, thereby alleviating a fundamental aspect of its landlocked predicament.

In contrast to the defensive strategy of hedging, hedging can also serve a leverage-enhancing function. As Figiaconi (2025) argues that non-major countries can utilize their own capabilities to overcome the systematic pressures exerted by great powers, Mongolia converts institutional membership from a mere venue for discussion into a dynamic platform for negotiation and role advancement. Mongolia employs its SCO observer status not merely for participation, but as a means of diplomatic leverage to enhance the significance and value of its inherent assets. The extensive mineral richness, especially in strategic minerals such as coking coal, copper, and rare earth elements, serves as a principal lever.

Mongolia's engagement with the SCO provides tangible benefits. In addition to previously identified advantages related to non-traditional security issues, the SCO's emphasis on regional connectivity, particularly railway development as noted in summit declarations (SCO, 2019; SCO, 2022), aligns with Mongolia's national development priorities.

By integrating resource development, transportation, and sustainability into SCO commitments, Mongolia can shift bilateral negotiations into a multilateral framework, thereby implic-

itly introducing institutional oversight and standards that may strengthen its negotiating stance, vis-à-vis individual partners. Its physical location as a nexus between Northeast and Central Asia is utilized to establish a “cross-roads” character. Mongolia actively establishes and promotes its role as a crucial facilitator of regional cooperation through proactive agenda-setting, including advocating for transport and digital connectivity projects and hosting discussion events. This institutionalized pursuit of roles amplifies international exposure, draws investment from external “Third Neighbor”, and finally transforms geographic and economic characteristics into enduring diplomatic capital and influence. Mongolia’s engagement with the SCO provides tangible benefits. In addition to previously identified advantages related to non-traditional security issues, the SCO’s emphasis on regional connectivity, particularly railway development as noted in summit declarations (SCO, 2019; SCO, 2022), aligns with Mongolia’s national development priorities. The SCO also functions as a key platform for Mongolia to advance the Russia-Mongolia-China trilateral economic corridor, which will be discussed in a subsequent section. Although Mongolia’s participation in the SCO has not yet produced measurable increases in trade or investment, the organization’s focus on economic dialogue creates opportunities for Mongolia to promote its initiatives, develop transport corridors, and enhance economic cooperation with member states.

The two logics are not sequential or mutually exclusive; rather, they are dynamically interconnected and mutually reinforcing within a unified strategic framework (Kuik, 2021). Hedging, by alleviating existential risks, estab-

lishes the secure basis essential for the certain pursuit of leverage. Conversely, effective leveraging, achieved by strengthening Mongolia’s regional influence and negotiating power, reduces perceived vulnerability and enhances the credibility and effectiveness of its hedging strategies. The interplay between reducing dependency through hedging and increasing influence through leveraging is central to Mongolia’s approach to achieving institutional balance within the SCO framework.

Strategic Motivations: The Drive of Hedging and Leveraging

Mongolia’s historical context cannot be ignored in explaining its adaptive hedging in foreign policy. As a landlocked state positioned between China and Russia, Mongolia’s external domains were specifically influenced by their policies, and the most strategic vulnerabilities, pressures, and the result of having asymmetric capacity in many fields, unlike them, are the main incentives for Mongolia to adopt hedging. During the Cold War, Ulaanbaatar’s external orientation was dominated by an ideological alignment with the Soviet Union for several decades. After the democratic revolution in the 1990s, the window was redefined by elements that were infused with Mongolia’s rational and specific national interests. The transition to a market economy, the birth of a multi-party system, and the uncertainty during the power shift as the Soviet Union collapsed created an opportunity for Mongolia to pursue a foreign policy that upholds only Mongolia’s national interests, without any foreign persuasion. Thus, hedging identity emerged as a pragmatic response to overlapping alterations in both internal and external environments.

Hedging Security Risks

Mongolia's engagement with the SCO, particularly in security, is a strategic move aimed at acting as a buffer state and seeking stability. From 2004 to 2023, Mongolia has participated intermittently in SCO-led anti-terrorism and regional security exercises as an observer. On the other hand, China and Russia have seen tangible growth in their bilateral and trilateral military relations. This divergence underscores Mongolia's intent to avoid being drawn into hard security commitments without completely disappearing, by maintaining a presence in regional security collaborations as a buffer state.

Within the scope of military cooperation, a joint military exercise is held once every 2 years and is called "peace mission". The routine exercise within the SCO aims to deepen defense and security cooperation among member states, enhance their ability to address new challenges and threats, and jointly safeguard regional peace and security (Global Times, 2021). Early SCO joint exercises, such as Peace Mission 2005 and 2007, were conducted under this scope, focusing on counterterrorism (Tumurkhuleg, 2023). However, for Mongolian side, all these community issues are not seriously encountered at this moment through the means of violent ways because Mongolian demographic structure is not probably comparable to other members of the SCO, with the condition of having ethnic Mongols comprise over 90% of the total population out of only 3.5 million people (Embassy of Mongolia to the United States of America, n.d.), meaning such kind of activities are not serious problem for the country and Mongolians have not participated. Over the past decade, the SCO's military activities have escalated in scale and complexity, moving beyond a narrow purpose of opposing three evils. For example, Peace Mission 2018 and 2021 included mechanized infantry, airpower integration, and multinational joint

command structures—demonstrating a shift toward interoperability and strategic preparedness akin to military bloc sense. In parallel, China and Russia, though not specifically under the SCO's umbrella, have enhanced bilateral cooperation through exercises such as Vostok 2018 and 2022, which involve thousands of troops from various countries, including Mongolia, and that mirror the region's complex security environment (Banerjee, 2022).

In March 2020, the SCO, in collaboration with the United Nations Office on Drugs and Crime (UNODC), held a high-level event under the label of "SCO and UNODC in the Fight Against the Illicit Drug Threat: Countering Drug Trafficking via Darknet." (SCO, 2020b). This event highlighted how the crimes of drug trafficking thrive through the darknet, with information that drug-related transactions hold a significant share of darknet activities. In response to this growing tension regarding drugs, the organization's commitment to addressing this challenge found that it is better to oppose drug-related crimes through collaborative efforts exerted by the SCO members, including the international anti-drug operation "Spider Web", aimed at eradicating online channels responsible for distributing drugs (SCO, 2020a). The event urged the importance of international cooperation and comprehensive strategies. This gap may be addressed through the Ulaanbaatar Dialogue (UBD)'s institutional hedging. The UBD initiated by Mongolia in 2014 serves as a Track 1.5 platform that convenes government officials, scholars, and policy experts to discuss security and cooperation in Northeast Asia (Sukhbaatar, 2025). In this way, Mongolia's UBD functions as a normative incubator for regional security, which may be nested within broader frameworks such as the SCO through its anti-drug goals and non-traditional concerns, consolidating Mongolia's influence through soft conformity rather than formal accession.

The document of Mongolia's Defense Policy,

adopted in 2016, states that “Mongolia’s policy of preventing external military threats ... is to expand multilateral cooperation with neighboring countries and support the process of strengthening military trust in the region.” Under this clearly stated strategic guidance, the Mongolian Armed Forces have regularly held bilateral exercises with Russia and China, and Vostok 2018 was the first to include trilateral cooperation, fully in line with the above principle (National Institute for Security Studies, 2018). For Mongolia, this strategic demand comes with a challenge of blurring its long-held neutrality and its non-aligned identity worldwide. Even so, Mongolian joint military exercises are closely linked to all three powers, including the annually conducted “Khaan Quest” with the USA, as well as “Selenge-2024” and “Steppe Partner-2024” with Russia and China. However, none of them involves regular military duty.

Hedging Economic Dependence

The Transport Corridor competition between the East, Middle, and West railway proposals reveals the complex bargaining among China, Mongolia, and Russia within the SCO framework, each seeking to align regional connectivity with their respective national interests.

Under the label of China-Mongolia-Russia Economic Corridor (Figure 1), which is one of six key corridors of the Belt and Road Initiative (BRI) and embedded in the SCO’s strategic direction, the three main railway proposals —East Line, Middle Line, and West Line— demonstrate distinct interests that potentially serve one of its two neighbors sympathetically. These strategic corridors can be implemented in order, in line with Mongolia’s strategic move to balance its geopolitical and economic interests (Dorj & Davaasüren, 2020).

Figure 1. Mongolia-Russia-China Economic Corridor



The Eastern Corridor, which includes the Choibalsan–Khuut–Zuunkhatavch route, is in China’s interests. The Eastern route connects Russia’s Borzya to Mongolia’s eastern provinces. Finally, it terminates in Inner Mongolia and the Northeastern Chinese port of Jinzhou, totaling 434.2 km in Mongolian territory (Government Agency for Policy Coordination on State Property, 2023). The project is expected to transport up to 100,000 passengers and 20 million tons of coal, oil, iron ore, and transit cargo per year, with a payback period of 15.38 years (Dorj & Davaasüren, 2020). The main profitable aspect of this line is intensifying trade in underdeveloped areas of Mongolia, Russia, and China, with the potential for high economic activity due to their abundant resources. At the regional level, the Eastern route will be the preferred option if geopolitical tensions on the Korean Peninsula are de-escalated and interconnectivity in Northeast Asia is promoted, an issue that Mongolia actively works on (Dorj & Davaasüren, 2020).

After a 16-year delay, this project has recently been prioritized as a major government infrastructure initiative to expand mining capacity and stabilize long-term coal trade between Mongolia and China (Khaliun, 2025a).

Mongolia’s transport development strategy has emphasized the creation of additional railway corridors to complement the existing Central

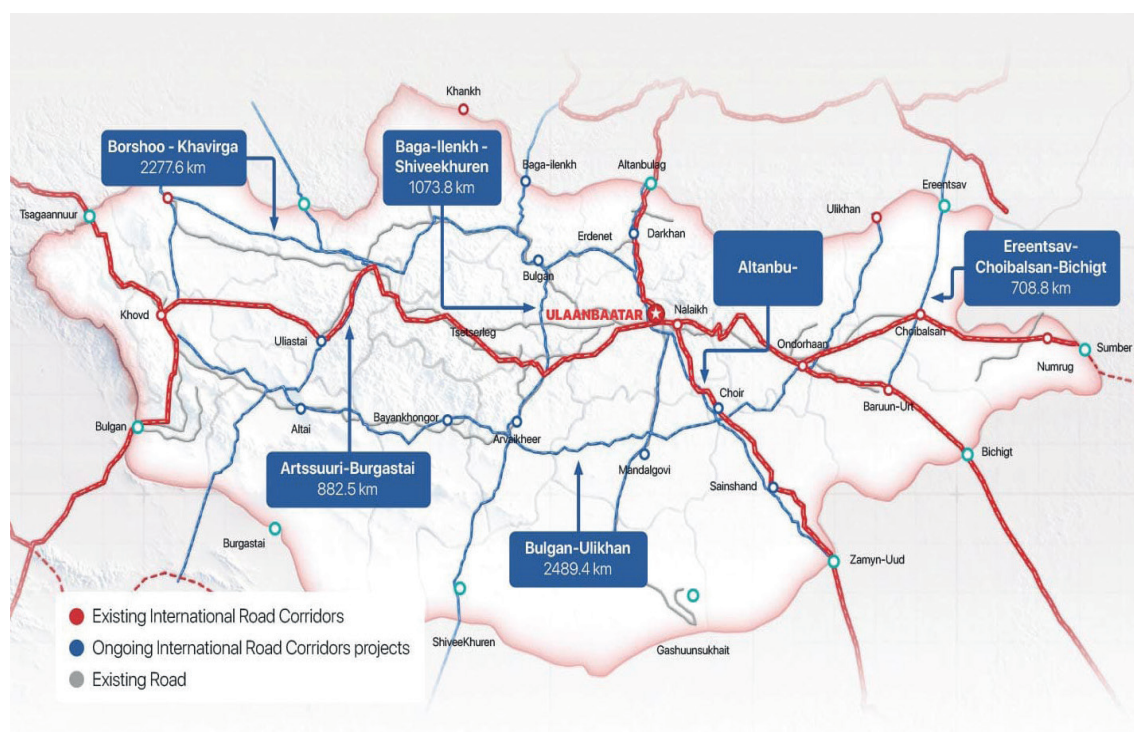
Corridor, thereby easing the load on the Sainshand–Zamiin–Uud–Erenhot–Ulaantsav route to a considerable extent. Currently, the Railway of Central Corridor in Mongolia is operating at its maximum capacity, and it is necessary to expand capacity and invest to increase the volume of cross-border transit cargo (Dorj & Davaasüren, 2020). Mongolia completed the Zuunbayan–Khangī railway in 2022, connecting its national railway network to the Khangī–Mandal border crossing with China (UN-OHRLLS, 2022). This railway provides access to the Chinese Inner Mongolian railway network, which serves major industrial centers such as Baotou and Hohhot. The development of industrial projects in the Sainshand region, including the ongoing oil refinery project, has further increased the strategic importance of expanding railway connectivity in southern Mongolia (Dorj & Davaasüren, 2020). The central railway corridor of the Trilateral Economic Corridor is planned to extend for 5,975 km. Feasibility studies have been completed for the 328 km Jinjing–Erenhot railway line on the Chinese side and the 254 km Naushki–Ulaan–Ude railway line on the Russian side (Ministry of Road and Transport of Mongolia, 2024). The feasibility study also includes the construction of a 1,087 km second railway line from the Sukhbaatar–Zamiin–Uud railway line on the Mongolian side (Ministry of Road and Transport of Mongolia, 2023).

Railway development along the West Line remains limited, whereas the highway network is comparatively well established. The Asian Highway Network AN-4 (Ulaanbaishint–Ulgii–Khovd–Yarantaar), spanning 725 km within Mongolian territory to Urumqi, China, is currently well developed (Dorj & Davaasüren, 2020). In contrast, the transverse route AN-32, also known as the Millennium Road, is not yet fully developed

and primarily serves local needs rather than fulfilling its intended international role of connecting neighboring countries (Dorj & Davaasüren, 2020). As of May 29, 2024, the main road infrastructure for the Artssuuri-Altai-Nariinsukhait-Shiveekhuren railway network was completed (Jargalsuren & Byambanaran, 2024). A branch line has been proposed to extend from the network southwest of Altai City, connecting to the Chinese railway via the port of Burgastai and leading to Xinjiang, China (Dorj & Davaasüren, 2020). This route may receive support from Russia. Within Mongolia's western export corridor, the Gashuunsukhait-Gantsmod cross-border railway is under construction to facilitate coal exports from the Tavan Tolgoi deposit to China. After a 16-year delay, this project has recently been prioritized as a ma-

ajor government infrastructure initiative to expand mining capacity and stabilize long-term coal trade between Mongolia and China (Khaliun, 2025a).

The eastern and western routes remain incomplete. Based on current conditions, the Central Corridor is the most strategically and practically feasible option for initial implementation. This corridor already facilitates a substantial portion of cross-border trade, particularly mining exports to China. In addition to its operational status, multilateral discussions within the SCO have underscored the importance of enhancing regional connectivity and transport corridors. Declarations from the 2019 SCO Summit in Bishkek and the 2022 SCO Summit in Samarkand emphasized the development of efficient transport routes and logistics networks in the region (SCO, 2019; SCO, 2022).



Asian Highway Infrastructure Connection in Mongolia
(Map: Mongolia.inc, 2024).

In light of these recent declarations, the Central Corridor offers the most promising prospects for early implementation among the three routes. At the same time, the other two remain in preliminary planning stages and face additional challenges.

In 2025, Mongolia ratified an agreement with China to construct the Gashuunsukhait-Gantsmod railway, linking the Tavan Tolgoi coal mine directly to China's rail network. Mongolia is committed to exporting 27 million tons of coal between 2025 and 2029. From 2030, 20 million tons will be transported to China. Over 16 years, approximately 247 million tons of coal will be consumed in China (Khaliun, 2025a). While it is formally a bilateral project, Mongolia leveraged its low-key presence through diplomatic channels and local policy under the broader SCO framework, such as engaging the SCO Interbank Association, where the Development Bank of Mongolia became a partner (Amarsaikhan, 2016), to secure favorable transportation terms. Though IBA did not fund the agreement, the SCO is largely shaped by China's financial leadership, and, technically, Mongolia's agreement with China is considered an attempt to participate in the SCO's development agenda.

Leveraging Resource Power

Geopolitics and national security are not the sole justification for Mongolia's strategic behavior towards the SCO; internal tensions over sovereignty and national control are a significant determinant, particularly regarding its natural resources, which account for the majority of Mongolia's GDP. The Tavan Tolgoi is a symbolic pursuit of Mongolia's effort to assert domestic authority, being one of Mongolia's largest mining deposits in terms of both production and profitability. This

coal resource accounts for more than 20% of the country's budget revenues (1.1 billion dollars for January to October 2023) (Kushhov, 2024). It attracts many investors, mostly from China, and they repeatedly propose joint development. However, Mongolia has been reluctant to enter into any arrangement that would grant foreign entities a controlling share due to fears of economic dependency and a loss of national autonomy.

The Tavan Tolgoi case shows how natural resources play a significant role in Mongolia's institutional leverage—shaping its economic structure in a way that flatters its own sovereignty and, thus, resists the depth of foreign influence.

Public opposition, parliamentary scrutiny, and institutional monitoring have pushed the state to maintain ownership of Tavan Tolgoi through Erdenes-Tavan Tolgoi, a state-owned enterprise. In doing so, Mongolia demonstrates a form of internalized checks and balances, where domestic institutions act as guardians of sovereignty against the prevailing economic hegemony of foreigners. In 2012, the Mongolian government planned to launch a \$3 billion initial public offering (IPO) of the Tavan Tolgoi, aiming to sell 29% of the company on the London and Hong Kong stock exchanges with the state-owned Erdenes-Tavan Tolgoi. (The Moscow Times, 2012). Previous attempts to collaborate with China's Shenhua, Peabody from

the United States, and a Russian-Mongolian joint consortium on the project were discontinued, as the government pursued selective partnerships with Japanese and South Korean investors. In response to public concerns about foreign control of strategic sectors, the Mongolian parliament enacted the Strategic Entities Foreign Investment Law in May 2012 to restrict foreign ownership in industries such as mining, finance, media, and telecommunications (U.S. Department of State, 2013). According to the law, it was not allowed for foreign investors' stake to exceed 49% in companies operating in these sectors, or for cooperation deals valued at over 100 billion Tugrik or involving state-owned firms (U.S. Department of State, 2013). It would have been even stricter for inves-

tors if it had followed each subject in the initial draft.

Mineral resources solidify Mongolia's broader diplomatic standing in the international arena. In a similar vein, Mongolia's long-standing observer status in the SCO has led it to explore possible cooperation in mining and infrastructure. However, deep down, this Northeast Asian country resists being drawn into the influential web of powerful countries, which could potentially jeopardize national strategic control. The Tavan Tolgoi case shows how natural resources play a significant role in Mongolia's institutional leverage—shaping its economic structure in a way that flatters its own sovereignty and, thus, resists the depth of foreign influence.



"Mineral resources solidify Mongolia's broader diplomatic standing in the international arena"
(Photo: Inside Mongolia, 2025).

Leveraging Role Identity

Between 2015 and 2023, Mongolia promoted its image within the SCO framework to enhance its diplomatic role, and its acceptance rate for proposals at the SCO Summit rose significantly. Mongolia's diplomatic discourse at SCO summits has evolved from that of a peripheral observer to a normative contributor on issues like infrastructure development, non-traditional security, and connectivity for landlocked states. A qualitative review of the summit speeches by Mongolia's presidents reveals the country's rhetorical strategy.

President Elbegdorj Tsakhia's 2016 address to the SCO Summit (Indra, 2016) reveals how Mongolia utilizes diplomatic gestures to assemble its identity as a constructive and integrated regional player. By repeatedly using brief, smooth language to congratulate India and Pakistan, who were nearing full membership in the SCO and the host country, Elbegdorj advances Mongolia's overall image as a conciliatory, cooperative, and respectful observer. At the strategic level, he proposed a "6+5" meeting to increase the value of observer states. Through that institutional mechanism, it can promote active interaction between full members and observers like Mongolia; in that case, he sought to build an activist presence for Mongolia as a norm entrepreneur. His words regarding Mongolia's "huge transit transport potential" and focus on the trilateral corridor with Russia and China, leveraging Mongolia's geographic location, aim to frame Mongolia as a valuable regional connector capable of coordinating among the SCO, the Eurasian Economic Union (EAEU), and China's BRI (Indra, 2016). Similar to its cautious approach to the SCO, Mongolia is not a member of the EAEU. However, it maintains limited economic engagement

with the bloc, as demonstrated by the ratification of a 2025 interim trade agreement intended to expand trade cooperation without full institutional integration (State Great Khural of Mongolia, 2025). These chosen narratives reveal Mongolia's strategic interest in leveraging its diplomatic benefits within multilateral platforms by aligning national capabilities with regional development concerns. Elbegdorj's rhetoric frames Mongolia's foreign policy role as fundamentally oriented toward bridging, contributing, and upholding international norms.

President Khurelsukh's speech outlines Mongolia's foreign policy as anchored in a "peaceful, open, multi-pillar, and independent foreign policy" and by naming Mongolia "Transit Mongolia" and highlighting its role as a link between Asia and Europe, Khurelsukh's speech advocates for present Mongolia's external potential as a narrative of regional connectivity and logistical centrality.

President of Mongolia Battulga Khaltmaa held a speech at the Plenary Session of the 18th Meeting of the Council of Heads of Member States of the SCO in Qingdao, China, in 2018 (Office of the President of Mongolia, 2018). President Battulga's 2018 SCO address has strengthened Mongolia's

strategic development as a comprehensive, multilateral, and economically cooperative and welcoming country. He praised the SCO's expanded scope of activities, which align with Mongolia's standing to enhance its regional value. By characterizing Mongolia as a "willing contributor" and a "bridge" to cooperation among members, observers, and dialogue partners, Battulga articulates a diplomatic approach grounded in partnership and practical integration. His repeated use of phrases about Mongolia's readiness, such as "we are ready," "we wish to work actively," and "we hope you will support," delivers a tone of cooperative engagement among the SCO countries. Once again, as with Elbegdorj, the weight placed on Mongolia's future trajectory involving the Economic Corridor with its immediate neighbors through China's

BRI and Russia's EAEU conveys a discourse of connectivity-oriented neutrality, promoting synergy without a strict bloc mechanism (Office of the President of Mongolia, 2018). Moreover, even though he has not specified the exact mechanism for calling on observers and dialogue partners to show active participation, like Elbegdorj's "6+5", Mongolia is still keen on pursuing lively interaction with the SCO countries, as he included it as a low-key presence in his speech. Thus, it suggests that Mongolia prefers to remain an observer, but it can serve as an important contributor to the SCO's further expansion. Throughout his speech, Battulga champions Mongolia's foreign policy within the SCO as a neutral facilitator, a committed observer that is not passive, and a proactive contributor to regional agendas.



President of Mongolia Khaltmaagiin Battulga delivered a speech at the Plenary Session of the 18th Meeting of the Council of Heads of Member States of the Shanghai Cooperation Organization in Qingdao, China, (June 10, 2018) (Photo: Office of the President of Mongolia, 2018).

President of Mongolia Khurelsukh Ukhnaa addressed the 2024 Meeting of the Council of Heads of State of the SCO in Astana (Office of the President of Mongolia, 2024). President Khurelsukh's speech outlines Mongolia's foreign policy as anchored in a "peaceful, open, multi-pillar, and independent foreign policy" and by naming Mongolia "Transit Mongolia" and highlighting its role as a link between Asia and Europe, Khurelsukh's speech advocates for present Mongolia's external potential as a narrative of regional connectivity and logistical centrality. His drawings for the "One Billion Trees" initiative and his preparations to host the 17th Conference of the Parties (COP17) further underscore Mongolia's ambition to become a crucial actor at the global level by demonstrating an active commitment to non-traditional issues despite its limited resources. Moreover, he calls on the countries in the meeting to consider cooperating with the International Think Tank for Landlocked Developing Countries. He signals Mongolia's efforts to lead on niche multilateral issues (Office of the President of Mongolia, 2024). Overall, Khurelsukh's words and linguistic behavior promote Mongolia's diplomatic presence in the region through neutrality, infrastructure diplomacy, and international legitimacy.

Across the speeches of Presidents Elbegdorj, Battulga, and Khurelsukh, Mongolia portrays itself as a neutral, cooperative, and strategically relevant state within the SCO, given its potential to strengthen trade among members. Together, their rhetoric attracts other members to Mongolia, positioning it as a connector state and seeking influence through infrastructure diplomacy, soft power, and multilateral cooperation, despite its size in the international arena.

Mongolia's Practice of Institutional Balancing

Institutional balancing constitutes a central element of Mongolia's broader hedging strategy. Whereas hedging denotes a general policy of maintaining flexible relations with major powers, institutional balancing specifically involves leveraging multilateral institutions to expand diplomatic options and mitigate reliance on major powers. Mongolia's engagement with the SCO demonstrates the intentional application of its dual strategic logic, operationalizing hedging and leveraging through targeted and innovative practices. This approach is characterized by tactical agility and entrepreneurial agency, moving beyond the constraints of passive membership. Through selective embeddedness, agenda reframing, and institutional nesting, Mongolia actively shapes its participation to maximize autonomy and influence. These practices elucidate the concrete mechanisms of institutional balancing, illustrating how a small state can transform a multilateral platform into a strategic instrument for advancing national interests.

Selective Embeddedness

The rationale behind Mongolia's ambiguous stance on neutrality is multifaceted. On one hand, its association with the organization can provide Mongolia with beneficial contacts and foster a positive regional atmosphere. Geographically, Mongolia is bordered solely by China and Russia, and its existence and future development are intrinsically linked to these two nations. Mongolia has a profound understanding of this situation and has strengthened its strategic relations with them at the policy level, particularly emphasizing its ties with Russia and China. However, maintaining a certain distance from the organization can preserve Mon-

golia's flexibility in its foreign policy. Engaging with the organization as an observer state rather than a member may allow Mongolia to cultivate goodwill without necessitating formal alignment processes.

Although other member states have not made explicit statements regarding Mongolia's participation in the Shanghai Cooperation Organization (SCO), both Russia and China have encouraged Mongolia to consider full membership. For instance, Russian Foreign Minister Sergey Lavrov described Mongolia as an "obvious candidate" for SCO membership and indicated that member states would support Mongolia's membership bid. Additionally, China extended a formal invitation for Mongolia to participate in SCO activities at a higher level (TASS, 2024; CGTN, 2018). Since 2004, Mongolia has maintained observer status for two decades and has not yet attained full membership. Mongolia's cautious rumination about the

SCO must be understood in the context of fundamental shifts in Sino-Russian strategic alignment, notably consolidated following the 2014 Joint Statement in Shanghai between Moscow and Beijing, shortly after the Russian invasion of Crimea, which then faced western sanctions. While Mongolia is not explicitly mentioned, it vows to deepen ties across the branches of military, economic, and regional policy coordination (Deutsche Welle, 2014). It understandably signals multiple hints to Mongolia as the joint declaration underscored a more unified bloc posture in Eurasia, certainly to go against the winds of Western allies. For the Mongols—a small, landlocked country that serves as an intermediary between them—this strategic kinship between Moscow and Beijing may pose some dilemmas. It reinforces Mongolia's motivation to avoid entanglement in this anti-Western, bloc-oriented interaction.



Chinese President Xi Jinping said that China, Russia, and Mongolia should enhance coordination and collaboration within the framework of the Shanghai Cooperation Organization (SCO) and called for elevating Mongolia's ties with the SCO (Photo: CGTN, 2018).

This external impulsion may enable Mongolia's shiftless mode to remain in observer status within the SCO for longer, making the country keen to pursue greater institutional engagement as a hedging approach, rather than committing to full membership. The former Foreign Minister Munkh-Orgil Tsend's opinion is that, on paper, joining or withdrawing from membership is portrayed as self-gratification. However, in reality, it is unlikely to happen and almost impossible. Another significant point he makes is that Mongolia has already received sufficient information from this organization as an observer, so the advantage of becoming a full member may not yield better results (Lkhagvajargal, 2018). From the outside, Mongolia's international image after attaining full membership may be perceived as completely under the influence of its two large neighbors. Moreover, he agonizes that the SCO is not a military organization in the true sense; however, given its history of establishment and developmental phases, there is a high probability that it will become a political bloc on the one hand and a military bloc on the other. Furthermore, from a geopolitical perspective, the heightened Sino-Russian alignment softens Mongolia's diplomatic maneuverability, increasing the burdens of genuine sense arising from the Third Neighbor Diplomacy policy and multilateral engagements with the West. Thus, Mongolia's indecision on SCO membership is not only a strategic calculation but also a proper response to evolving external pressures in its geopolitical environment.

Agenda Reframing

Through its reframing, Mongolia shifted the issue of uranium transport safety from "nuclear non-proliferation" to "cross-border infrastruc-

ture protection." Mongolia's uranium sector has seen a shift in strategic policy from traditional nuclear non-proliferation concerns to cross-border infrastructure protection. This reframing occurred due to the nation's cross-border goals of economic development and geopolitical positioning. In 1992, the first President of Mongolia, Ochirbat Punsalmaa, addressed the 47th session of the UN General Assembly and declared that Mongolia would become a nuclear-weapon-free zone and work to secure it internationally (National University of Mongolia, 2017). The five permanent members of the UN Security Council (P5) were surprised by Mongolia's declaration, as at that moment the establishment of a nuclear-weapon-free zone by a single state's initiative was unprecedented in international relations and could upset the strategic calculations of the great powers. The UN General Assembly adopted a resolution on "Mongolia's International Security and Nuclear-Weapon-Free Status" in 1998, following Mongolia and the P5 reaching common ground on the issue. Mongolia ranks 12th in terms of uranium reserves, accounting for 1% of the world's total (World Nuclear News, 2025). The conventional understanding of uranium is largely that it is highly toxic and extremely hazardous, posing a real challenge to further development in this branch.

However, with a new focus on developing its uranium mining sector, Mongolia has shifted its uranium agenda from "never-using" to "economic benefits". Mongolia is known to have rich uranium resources, but uranium mining has been halted since 1995. In 1997, the French company Orano began uranium exploration in the Gobi Desert, where it eventually discovered deposits at Dulaan Uul and Zuuvch Ovoo in 2002 and 2010, respectively. The Orano Group and the Mongo-

lian Government agreed to sign a cooperation agreement for the Zuuvch Ovoo project in 2025, attracting foreign investment to the country. Yellowcake produced in Mongolia will be transported to France via China by sea. Over 50 large and small nuclear power plants are being built in China (Khaliun, 2025b). Transportation shall be coordinated through an agreement between France and China, and it is clear that China is granted a certain percentage of use of its territory. This opens the door to opportunities for Mongolia and the SCO members in this kind of cooperation.

Institutional Nesting and Innovation

Through its efforts, Mongolia secured the incorporation of the principles of its “Law on the Protection of Nomadic Cultural Heritage” into the SCO Tourism Cooperation Framework. Cultural immunity is mostly taken at the top level, from a national security perspective, among many nations. For example, Mongolians are called nomadic people, thus making the biggest difference from their two neighbors with sedentary civilizations. Protecting tangible heritage, such as Mongolian yurts, deer statues, and rock carvings, and intangible heritage, such as the dairy and meat-processing methods practiced by Mongolians for thousands of years, is important for preserving cultural identity. Mongolia’s legal basis for its commitment to its nomadic cultural heritage is the “Law on the Protection of Cultural Heritage”, revised in 2021 and serving as a comprehensive framework for protecting both tangible and intangible cultural assets (Ankhtuya, 2022). The similarities between Mongolia and Central Asian countries are reasonable, given their histories and shared cultural traits. It is another issue where Mongolia can leverage its significant position in

SCO activities.

One of the SCO’s priorities is humanitarian affairs. The SCO member states have accumulated extensive experience in implementing practical, fruitful cooperation across areas such as culture, education, the environment, youth policy, sports, tourism, and the media (Davaadorj & Damdin-suren, 2022). Member states of the SCO recognize the importance of cultural and humanitarian cooperation. The Astana Declaration has set the way for the preservation of historical and spiritual heritage, including indigenous peoples’ traditional cultures (SCO, 2024). The organization aims to expand the scope of mutually beneficial cooperation in tourism and develop tourism infrastructure among members, guided by the adoption of a Joint Action Plan to implement the SCO Tourism Cooperation Program for 2024–2025.

Given the alignment between local legislation and the SCO’s regional initiatives in culture and tourism, Mongolia can contribute to the broader standardization and integration of cultural heritage preservation. This reciprocity enhances not only Mongolia’s cultural diplomacy but also the SCO’s objectives of promoting cultural diversity and sustainable tourism development.

Conclusion

Since the 1990s, in an attempt to diversify its foreign partners beyond Russia and China and broaden its multilateral diplomacy, Mongolia took a major step by adopting strategic flexibility at the policy level, declaring the Third Neighbor Diplomacy policy. The essence of this brand-new policy at this time is to create a favorable environment for strengthening political and economic ties with highly developed countries, notably the US, the EU, Japan, and South Korea (Aktamov et al., 2019).


The Western countries saw Mongolia as a strategic asset in East Asia and were willing to plant democracy and an open-market economy in the country; thus, Mongolia was seen as an experiment to test the principles and methods of democratic transition. This policy is dedicated to diminishing strategic vulnerability and safeguarding its own autonomy amid the unpredictable dynamics of international relations.

In 2004, a special observer status was created for countries such as Mongolia (Adiya, 2023). Since the guarantee of Mongolia's security lies in good relations with its two neighbors, maintaining its observer status rather than joining the SCO is undoubtedly an important position that will not conflict with other regular features of Mongolia's open and multi-pillared foreign policy and the interests of "third" countries in Mongolia in the current difficult international situation. Thus, Mongolia has not applied to become an SCO member for proper reasons (Li, 2018). Strategically, the notable reason is its multi-pillar and "Third Neighbor" foreign policy. Normal development of ties with the US, the EU, or East Asian Giants like South Korea or Japan, is an essential part of its survival in a buffer zone between superpowers. There are certain risks arising from full-fledged membership in the SCO, which is operated under the guidance of China and Russia, and being wary of its diplomatic independence and relations with third neighbors after participation.

By clinging to observer status amid possible pressure from superpowers, Mongolia has strategically shaped its own agenda for rule, proposing mechanisms suitable for observers. This approach offers plenty of opportunities for Mongolia, where its national goals can meet regional needs. Through discourse-driven diplomacy—from President Elbegdorj's "6+5" framework to Khurel-

sukh's environmental cooperation address landed on the SCO, and Battulga's connectivity-oriented rhetoric—Mongolia has paved an unhindered path for its foreign policy that prioritizes neutrality, contribution, and cooperation. This requires a long, ongoing implementation to see its final results, but it is consistent. Institutional balance and a multilaterally-based agenda do safeguard Mongolia's sovereignty. However, they also underpin the country's ability to pursue innovative engagement in complex regional settings, offering a valuable experience for other small and medium-sized nations.

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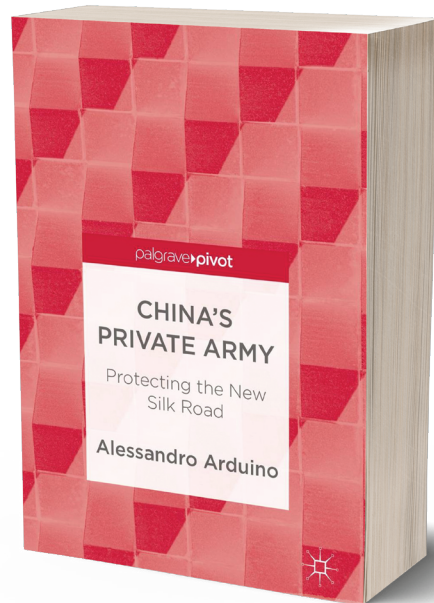
Securing the Belt and Road: Private Security, Risk, and China's Global Expansion

Arduino, A. (2018). *China's Private Army: Protecting the New Silk Road*. Singapore: Palgrave Pivot.



ASSOC. PROF. NORA MAHER*

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As China's Belt and Road Initiative (BRI) continues to stretch into regions marked by political instability, concerns about the safety of its investments, personnel, and infrastructure are becoming more pressing. In his book, *China's Private Army: Protecting the New Silk Road*, Alessandro Arduino delves into a less-discussed aspect of the BRI: the increasing involvement of Chinese private security companies (PSCs) in protecting these overseas ventures. Instead of focusing on high-level state diplomacy or broad economic im-

pacts, the book explores how outsourcing security has become a practical response to the risks posed by China's expanding global footprint. Drawing on real-world incidents, such as attacks on Chinese workers in Pakistan and Mali, riots targeting Chinese projects in Kyrgyzstan, and persistent instability in countries such as South Sudan, Libya, and Afghanistan, the book demonstrates that security challenges are not abstract or hypothetical but constitute daily operational threats confronting Chinese enterprises abroad.

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Arduino argues that Chinese PSCs represent a unique and developing security model, influenced by China's political system, legal constraints, and strategic culture. Unlike Western PSCs, which emerged in liberalized security markets and conflict zones such as Iraq and Afghanistan, these Chinese firms operate under strict government supervision. They are closely aligned with Beijing's foreign policy priorities. Consequently, they act less like independent businesses and more like extensions of the state. This approach, as detailed in the book, reflects China's preference for protecting overseas interests without resorting to direct military deployment, thereby avoiding diplomatic escalation and maintaining its stated commitment to non-interference. At the same time, Arduino shows that this tight state oversight constrains PSCs' operational autonomy, particularly in high-risk environments.

He sheds light on international frameworks such as the International Code of Conduct Association (ICoCA) alongside domestic regulations, including China's 2010 security law, to highlight the persistent lack of clear definitions governing private security activities abroad.

The book offers a clear and insightful indication of the legal, institutional, and operational contexts in which Chinese private security companies operate. The author examines their evolu-

tion from local security providers to key players on the international stage, mainly within BRI regions spanning Asia, Africa, and the Middle East. He sheds light on international frameworks such as the International Code of Conduct Association (ICoCA) alongside domestic regulations, including China's 2010 security law, to highlight the persistent lack of clear definitions governing private security activities abroad. This regulatory gray zone, he argues, creates significant challenges for accountability, oversight, and coordination with host states. The analysis is especially important for showing how legal uncertainty intersects with reputational risk as Chinese companies seek to distance themselves from the negative "mercenary" image associated with private military groups.

Methodologically, the book takes a practical approach, using policy documents, interviews, and case studies to explore how Chinese PSCs actually operate. This empirical strategy enables Arduino to move beyond abstract discussions of security and critically assess China's overseas risk management practices, showing how state-owned enterprises (SOEs) and policymakers have historically prioritized financial and commercial risk while underestimating political, social, and security threats. By tracing these shortcomings through concrete examples, including local resentment, labor disputes, environmental protests, and outbreaks of violence against Chinese personnel and assets, the book demonstrates that the absence of robust corporate social responsibility (CSR) frameworks and effective crisis management mechanisms is a direct contributor to insecurity along BRI corridors.

Additionally, Arduino excels at breaking down complex security measures into a clear and understandable narrative. His analysis of specific companies, combined with a contrast to international actors such as Blackwater and Frontier Service Group, adds empirical depth and positions Chinese PSCs within broader global debates on the privatization of security, an issue that theoretical discussions frequently neglect.

Looking ahead, the book examines future developments shaping security along the BRI. It highlights factors such as the growing role of the

insurance industry in risk management, opportunities for international collaboration through groups like the AIIB and SCO, and emerging technologies, including cyber threats and drone warfare. These issues are also examined within larger social and geopolitical contexts, including the effects of China's one-child policy on its demographics and the challenges of managing public opinion in the age of social media.

At the same time, the book's focus on descriptive institutional mapping limits its broader theoretical contribution. Although Arduino effec-



“Looking ahead, the book examines future developments shaping security along the BRI.”
 Leaders at the 3rd Belt and Road International Cooperation Forum
 in Beijing on October 17–18, 2023
 (Photo: BRF, 2023).

tively shows how PSCs differ from their Western counterparts, the analysis does not delve deeply into frameworks like security governance or theories of privatization. Furthermore, the absence of a systematic comparison limits the book's engagement with broader global debates on security privatization. While it acknowledges the political risks of deploying PSCs, there is limited discussion of how such practices might affect the sovereignty of host states or alter long-term local security dynamics.

By combining regulatory analysis, comparative insight, and regionally diverse case studies, Arduino enriches discussions that often focus only on military strength or geopolitical competition within the BRI framework. This book is especially relevant for researchers of international security, Chinese foreign policy, and the global political economy, as well as for policymakers dealing with risk management along key infrastructure corridors.

In addition, although Arduino offers a thorough diagnosis of the problems facing Chinese overseas security provision, he provides fewer concrete policy recommendations for how China and its SOEs can align their economic ambitions

with their security needs. Similarly, although the conclusion raises important warnings against a “race to the bottom” in security contracting, where cost-cutting leads SOEs to hire underqualified PSCs, it provides limited evidence on the overseas performance of Chinese PSCs themselves.

Another limitation concerns the study time frame. Since the book was published during the early stages of the Belt and Road Initiative, it primarily focuses on the initial phase of China's adjustments to overseas security. It does not cover later developments, such as China's expanded diplomatic security roles or changes in regulations, which fall outside its temporal scope.

Despite these limitations, *China's Private Army* makes a timely and important contribution to understanding the security dimension of the Belt and Road Initiative. By combining regulatory analysis, comparative insight, and regionally diverse case studies, Arduino enriches discussions that often focus only on military strength or geopolitical competition within the BRI framework. This book is especially relevant for researchers of international security, Chinese foreign policy, and the global political economy, as well as for policymakers dealing with risk management along key infrastructure corridors.

Overall, Arduino's work effectively shows how security provision has become a crucial, though often understated, component of China's global economic strategy. It highlights China's evolving approaches to protecting the New Silk Road and raises significant questions about the future governance of security under the Belt and Road Initiative. 🌸

HAFEZ SHIRAZI *



**Hafez Shirazi (also given as Hafez, l. 1315-1390) is considered the greatest of the Persian poets and among the most famous and admired writers in world literature. He is among the most often translated poets in the present day, and his work continues to resonate with modern audiences. His full name is Khwaja Shams-ud-Din Muhammed Hafez-e Shiraz, but he was known as Hafez (which means “memorizer”) because he memorized the Quran at an early age and would later memorize the works of other Persian poets such as Sanai (l. 1080 - c. 1131), Attar (l. 1145 - c. 1220), Rumi (l. 1207-1273), Saadi (l. 1210 - c. 1291), and Nizami (l. c. 1141-1209), all of whom would influence his own work. Hafez’s poetry focuses on the transcendent power of love and the transformative effects of opening oneself up to all experience through embracing what it means to be a human being in the fullest sense, which, to Hafez, includes an intimate relationship with God.*

Do not be sad!**

Joseph, lost in Canaan, will return, do not grieve
 One day the hut of sorrows will become a rose garden, do not grieve!

O sorrowful heart, your condition will improve, do not worry
 This misery will pass, your head will calm down, weep no more.

Even if the wheel of fate does not turn as we wish for two days
 The destiny does not always remain in one place, weep no more.

If the spring of your life comes, you will again open
 the rose umbrella over the meadows, O nightingale, do not grieve

Do not despair, for you do not know the secret of the unseen
 Many hidden games are played behind the curtain, weep no more.

If you are to walk in the desert with the love of the Kaaba
 Even if thistles pierce your feet, do not grieve.

In the separation of the beloved and in the distress of the rival,
 God, who always changes our state, knows all this, weep no more

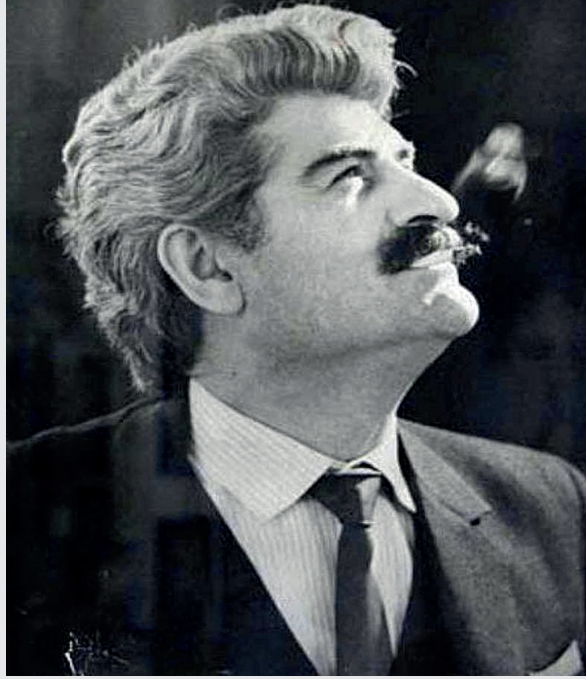
Even if the flood of nothingness uproots the foundations of existence, O heart
 Your captain is Noah, do not fear the flood, don't be sad

Even though the destination is full of danger, and the path is very long,
 There is no road without an end, weep no more

In the corner of poverty, in the loneliness of these dark nights, Hafiz,
 Your constant recitation is prayer and the Quran, do not grieve.



HASAN HÜSEYİN KORKMAZGİL*



**Hasan Hüseyin Korkmazgil (1927-1984) is one of the most prominent representatives of the socialist-realist tradition in Turkish poetry. Born in Gürün (Sivas), his upbringing in a poor, working-class environment deeply shaped his poetic sensibility. He worked as a teacher, faced imprisonment for political reasons, and sustained his life through various occupations. Korkmazgil's poetry centers on the everyday life of ordinary people, labor struggles, and social inequalities. His work combines strong lyricism with political consciousness, frequently drawing on folk language, idioms, and the rhythmic qualities of traditional Turkish verse. At the same time, he incorporates elements of modern poetry, creating a distinctive and powerful voice. With major works such as *Kavel*, *Kızılırmak*, and *Acıyı Bal Eyledik*, he established a wide influence in Turkish literature. For Korkmazgil, poetry was not merely an aesthetic endeavor but also a means of social engagement and resistance. Hasan Hüseyin occupies a lasting position in Turkish literature as a poet who successfully fused folk traditions with modern forms while articulating a strong social and political consciousness.*

Otherwise you will not exist**

Are you all alone in the world?

Is the land you were born on pushing you away?

Are there bandits at the street corners?

Have they tainted your bread?

You will send your roots into the soil.

Greeting the sun with a plane tree,

You will stand against the storm with an oak.

You will hold on tooth and nail,

You will hold on claw and claw,

You will pass through the capillaries of the universe,

You will bloom like a rose in its veins,

dawn by dawn...

You will become walnut and fall.

Did they strike you once?

You will gather yourself together,

And you will strike back twice.

Otherwise, you are not there, they will erase your name from the blackboard.



LOUIS DAGUERRE*

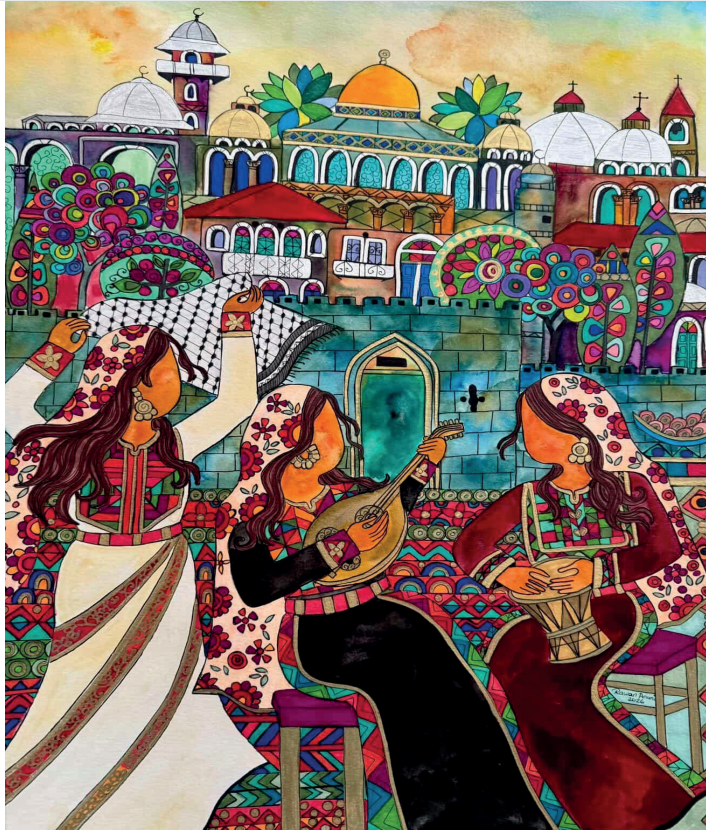


Boulevard du Temple (1837).

**Boulevard du Temple is a photograph widely considered the first to depict a human. It is a Parisian streetscape taken by Louis Daguerre (Louis-Jacques-Mandé Daguerre), a French scientist, artist, and photographer, from his studio window in the early morning hours of 1837 (or 1838), and is one of the earliest surviving daguerreotype plates. In this photograph, which holds historical significance, despite the crowd in the street, other moving people and vehicles are not visible due to the long exposure time; the only person visible is a man having his shoes shined. This image is a turning point, documenting “the first human moment” through the technique of recording light over a long period, rather than simply capturing the moment itself.*

Source: Retrieved April 20, 2026, from http://www.niepce-daguerre.com/boulevard_du_Temple_de_dag.html

RAWAN ANANI*

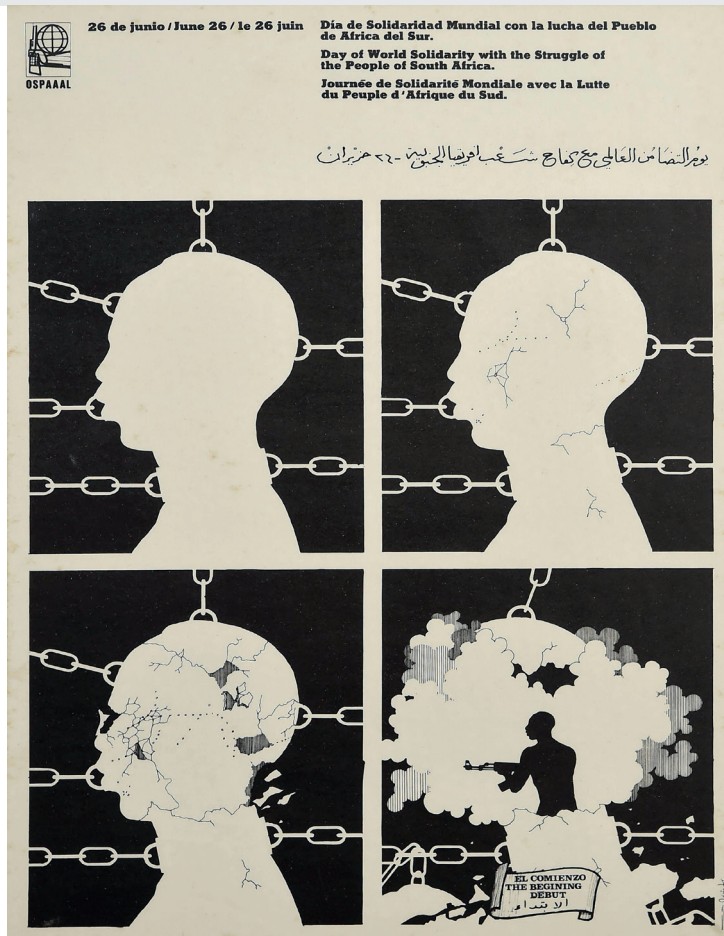


Women of Jerusalem (2026).

*Rawan Anani is a Palestinian visual artist known for her vibrant paintings that celebrate Palestinian heritage, identity, and everyday life. Born in Jerusalem in 1978, she grew up in an artistic family and was deeply influenced by her father, a well-known artist, which shaped her passion for painting from a young age. Her work often features Palestinian women, traditional architecture, and landscapes, using bright colors and distinctive faceless figures to symbolize resilience, culture, and collective memory. She has developed a recognizable style focused on preserving and expressing the beauty of Palestinian cities and traditions. *Women of Jerusalem* portrays three faceless women immersed in music and dance, symbolizing unity, resilience, and shared identity. Dressed in richly embroidered traditional garments, one dances gracefully while the others play the oud and drum, creating a lively atmosphere of celebration and cultural continuity. Behind them rises a vibrant Jerusalem skyline, with domes, arches, and sacred architecture rendered in bright, harmonious colors, reflecting the city's spiritual and historical richness. Stylized trees and intricate patterns fill the scene, blending nature with architecture and echoing Palestinian folk art traditions.

Source: Artist's personal collection.

OLIVIO MARTINEZ*



Day of World Solidarity within the Struggle of the People of South Africa, June 26 (1974).

**The Organization of Solidarity with the Peoples of Asia, Africa, and Latin America (OSPAAAL) is a Cuba-based internationalist organization that supports national liberation movements fighting against imperialism. Founded in Havana in 1966, it published numerous posters to draw attention to the struggle for freedom in South Africa. This poster, designed by Olivio Martinez, depicts the fight against 'Apartheid'.*

Source: Retrieved April 20, 2026, from <https://www.jstor.org/stable/community.24995116>.



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Cultural Heritage Plunder Imperialist Hegemony and the Struggle for Restitution

“Ultimately, the looting of cultural heritage constitutes a threat to the shared memory of humanity. It must therefore be addressed not as the responsibility of individual states alone, but as a collective responsibility of all countries. At the same time, given that this plunder disproportionately targets the developing world while the artifacts are largely concentrated in imperial centers, cooperation among developing countries will be decisive in strengthening this struggle. Efforts to protect and reclaim cultural property are not only about preserving the past, but also about contributing to the construction of a more just, balanced, and multilateral international order.”

Editor-in-Chief
FİKRET AKFIRAT