



Applying New Solutions for Cultural Heritage protection by
Innovative, Scientific, social and economic Engagement

Policy Brief 2

Toward a European Interdisciplinary Competence Centre
to Combat the Illicit Trafficking of Cultural Heritage

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We have reached a ‘ripe moment’ for European Union action in the field of illicit trafficking of cultural goods. The wars we have witnessed have shown how cultural heritage is at risk during armed conflicts. Member States and the European Commission are focusing their efforts on security. From 2018 to today, the EU has made great progress regarding policies in the field of cultural heritage protection. Finally, we are approaching the next European Union budget for the 2028–2034 period, the Multiannual Financial Framework. This critical juncture presents us with a unique window to strengthen the fight against looting and trafficking: what we need is a coordinated, comprehensive, bottom-up, interdisciplinary, European response.

The European Union needs **a European Interdisciplinary Competence Centre to combat the illicit trafficking and looting of cultural goods.**

This brief is a digestible version of a longer version showing how the policy research has been conducted. The Policy Research provides the grounds for all the claims that are present in this Policy Brief.



Structural shortcomings in the current European response

The Horizon 2020 project NETCHER demonstrated the high value of transnational and interdisciplinary cooperation, emphasizing the necessity of a holistic, bottom-up and inclusive approach to combating cultural goods trafficking. A necessity that has been echoed multiple times by the EU, with the culmination of the EU Action Plan on illicit trafficking of cultural goods.

Nevertheless, the current context clearly shows 2 main policy gaps that should be addressed if we want the current efforts at national and European level to be sustainable and framed in a long-term vision.

The first gap: Europe in a fragmented ecosystem

Europe's triple role as source, transit, and destination for cultural goods places the continent at the epicentre of both legitimate and illicit cultural trade. The EU has developed a substantial normative framework to face the raising connected issues – the main examples being Regulation (EC) 116/2009 on export controls, Directive 2014/60/EU on the return of cultural objects, Regulation (EU) 2019/880 **on the import of cultural goods, which becomes fully applicable on 28 June 2025, aiming to establish a harmonized import system across the EU.** However, implementation varies significantly across Member States, creating loopholes that undermine the effectiveness of the regulatory framework and allow for the manipulation of origin and provenance claims.

The presence of specialized actors at national level (with specialized Law Enforcement units in France, Italy, Spain and Belgium) remains an exception, cultural heritage crime fighting relying on general police forces or customs authorities.

This disparity creates a two-tier system that criminal networks actively exploit, leveraging jurisdictional gaps and capacity imbalances to evade detection and prosecution across borders.

At the European level, CULTNET, EUROPOL, and the ICOM International Observatory on Illicit Traffic in Cultural Goods represent valuable coordination efforts that demonstrate the potential for effective collaboration. However, these initiatives often operate under structural constraints: informal network arrangements, absence of dedicated budgets or permanent secretariats, and dependency on cyclical EU funding that creates uncertainty and limits long-term planning capacity.

The 3 critical limitations of this situation are:

- The **dependency on personal and informal networks** creating vulnerability to staff turnover and institutional changes,
- **Geographic coverage remains fundamentally uneven**, creating operational blind spots that criminal networks can exploit,
- **The temporal limitations of project-based funding** prevent the accumulation of expertise and the development of sustainable solutions.

A European Competence Centre could address these limitations by providing a permanent platform for coordination, knowledge sharing, and capacity building that transcends the limitations of individual projects and national boundaries.

The second gap: interconnected structural shortcomings

Three deeply interconnected structural shortcomings undermine the coherence and effectiveness of the European response to cultural heritage trafficking.

Firstly, institutional fragmentation is present in multiple key areas.

In LEAs capacity, since cooperation between national agencies is usually ad hoc and informal, often dependent on personal contacts or INTERPOL notices. This creates a system vulnerable to inconsistencies, delays, and operational inefficiencies.

Secondly, the European Commission has acknowledged that scrutiny and control of trade in cultural goods can vary widely within the single market allowing for the manipulation of origin and provenance claims - conflicts between the laws of origin countries and market countries further complicate restitution efforts, particularly when prescription periods for claims differ substantially between Member States.

Finally, data infrastructures are siloed and incompatible. Despite the need for standardization and shared access among stakeholders from different expertise areas, there is still no centralized EU database integrating Member States' inventories, customs records, and police data on stolen or trafficked cultural objects. Instead, such information remains siloed within national systems, often inaccessible or incompatible with one another. The standardization of this data and its resulting interoperability is often identified as an obstacle that hinders anti-trafficking efforts, even within the same ecosystem.

Secondly, we witness a deficit in interdisciplinary coordination, resulting in siloed communities.

Cultural Heritage Institutions (CHIs) and professionals are key in the fight: timely access to art historians, archaeologists, and heritage professionals to identify, authenticate, and assess damage to seized items is fundamental, but currently this expertise may often be accessible through informal or personal networks. Central to this expertise are provenance studies, which provide the fundamental knowledge necessary for object identification and authentication. Classical archaeology, through meticulous work on production workshops, manufacturing techniques, and regional stylistic traditions, enables experts to connect objects to their original sites and contexts. The lack of systematic cooperation also prevents CHIs from playing the preventive role that is theoretically associated with them. Social Sciences and Humanities (SSH) research provides essential insights into the root causes and impacts of trafficking, indispensable to develop evidence-based policies and strategies addressing these causes. Their presence in the fight is however limited and they often lack access to operational data needed for rigorous analysis. Technological tools are more and more central in the fight, but their development is not sufficiently informed by SSH research – developers should cooperate with both end users and researchers in order to produce impact in real-world conditions, and currently this does not happen in the majority of cases. Civil Society Organizations can enhance the awareness-raising actions, by leading grass root campaigns, but they often lack the resources and connections to the experts in the fight with relevant information. Allowing them to use their extensive networks could have strong long-term impacts.

Lastly, current European initiatives suffer from discontinuity and limitations. Over the past decade, the EU has invested nearly €18 million in valuable projects like ANCHISE, AURORA, ENIGMA, PREVISION, RITHMS, and PITCHER. Yet these initiatives are time-limited and fragmented, making it hard to achieve lasting impact. The project-based approach remains fundamental to European innovation, enabling experimentation, risk-taking, and breakthrough discoveries. However, without complementary infrastructure to preserve and build upon project outcomes, innovative solutions risk being lost between funding cycles. Redirecting resources into a permanent European Competence Centre would multiply results, centralize expertise, support consistent cooperation across sectors, and finally turn successful pilots into a durable European strategy.

The imperative for European institutionalization

Europe already invests heavily in fighting cultural heritage trafficking and has world-class expertise, but efforts remain fragmented and short-lived. Criminal networks exploit gaps between national systems, while temporary projects fail to sustain interdisciplinary cooperation. Now is the time to connect these assets through a European Interdisciplinary Competence Centre. This Centre would unify law enforcement, researchers, cultural institutions, and civil society in a permanent platform, maximizing return on investment and closing operational gaps. It would serve as a catalyst for transforming the current landscape of fragmented initiatives into a coherent European strategy that leverages national strengths while addressing collective weaknesses. Most importantly, it would establish the foundation for long-term institutional development that could evolve toward more ambitious arrangements as political conditions permit.

With clear EU political commitment, regulatory leadership, and the upcoming budget cycle (MFF), the EU has both the responsibility and opportunity to turn fragmented initiatives into a lasting, effective European strategy.

Competence Centre: a strategic institutional choice



A competence centre can be launched quickly through Horizon Europe funding as a prototyping phase, it is less politically sensitive, and keeps a collaborative and bottom-up spirit rather than imposing top-down control. This model allows all key actors, law enforcement, heritage experts, researchers, technology developers, and civil society, to participate equally. The Centre would function as an incubator for harmonizing currently uneven national capacities in cultural heritage protection. While some Member States possess sophisticated specialized units like France's OCBC or Italy's Carabinieri TPC, others rely on general police forces with limited heritage expertise. The centre would serve as a capacity-building catalyst, helping to elevate and standardize national capabilities through targeted training, methodology sharing, and expert exchanges.

Importantly, the competence centre can act as an incubator for a future agency. By testing how interdisciplinary cooperation works in practice, gathering evidence of impact, and demonstrating added value, it builds the arguments needed to justify stronger legal structures later. By systematically building national expertise and establishing common standards and procedures, the centre would lay the essential groundwork upon which a future agency could operate effectively from day one. This approach respects current political realities while laying the foundation for a dedicated European agency in the

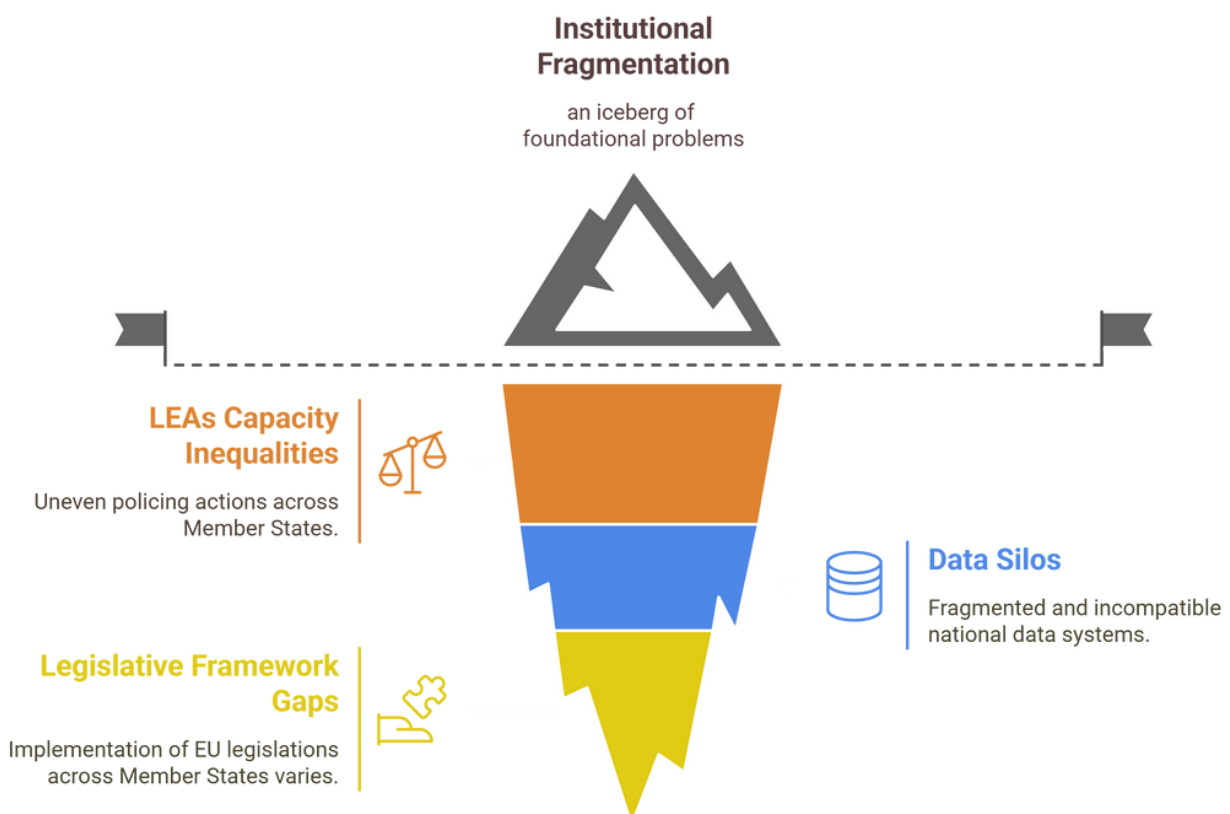
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future, one with stable budgets, stronger powers, and full institutional legitimacy to tackle trafficking effectively.

A European Competence Centre would help the EU protect cultural heritage beyond its borders, supporting countries affected by conflict and large-scale looting. Regulation (EU) 2019/880 and the 2021 Council conclusion on an EU approach to Cultural Heritage in conflicts and crises confirm that safeguarding cultural heritage is a global responsibility, as cultural heritage is a vector for peace and mutual understanding. The Centre could operationalize this vision, by offering a permanent and agile reference body. By centralizing technical knowledge and aligning efforts with UNESCO, EUROPOL, INTERPOL and UNIDROIT, the Centre would ensure the EU can act quickly and effectively when heritage is at risk worldwide.

Moreover, the proposed Centre would integrate seamlessly into the evolving landscape of European coordination mechanisms and initiatives already established across various domains, including culture, **building synergies with emerging European digital heritage initiatives such as the Common European Data Space for Cultural Heritage, the European Collaborative Cloud for Cultural Heritage (ECCCH), and the European Open Science Cloud (EOSC)**, as well as with international organisations such as UNESCO, ICOM, and INTERPOL.





European Competence Centres: models and lessons

To design an effective European Competence Centre, we can learn from three examples. The **European Cybersecurity Competence Centre** shows how a federated structure established with EU regulation (Regulation (EU) 2021/887) with national hubs and EU funding can pool expertise and set shared priorities. The **European Competence Centre for Social Innovation** proves a centre can work well as a flexible support hub without being a separate agency, focusing on knowledge sharing, networking facility and capacity building. The 4CH project - Competence Centre for the Conservation of Cultural Heritage demonstrates that starting as a pilot with Horizon funding can successfully lead to long-term digital services and networks.

From these models, we learn the importance of combining central formal coordination with strong national networks, engaging diverse stakeholders through bottom-up approaches, and using EU funding to avoid political hurdles as a first instance. However, the cultural goods centre should differ in a specific way: it does not need regulatory powers but should support bottom-up initiatives, help communities scale up solutions, and connect expertise. Starting as a **pilot Coordination and Support Action under Horizon Europe** will allow it to grow sustainably.

The proposed centre would operate in full complementarity and synergy with these existing European Competence Centres, addressing a distinct coordination gap that current structures do not cover. Unlike the European Cybersecurity Competence Centre, which focuses on technological sovereignty and industrial competitiveness, or the Social Innovation Centre, which targets employment and inclusion policies, the cultural heritage centre would concentrate specifically on law enforcement coordination, provenance research, and heritage protection. Drawing from the 4CH and 3D-4CH experience in cultural heritage conservation through digital technologies, the trafficking centre would address entirely different challenges: criminal investigation support, interdisciplinary cooperation in anti-trafficking efforts, and capacity building for law enforcement agencies. Rather than creating redundancy, the Centre would fill a specific coordination gap while complementing existing structures and initiatives through coherent and collaborative approaches.

What structure for the ECC



The European Competence Centre should be built on six main communities working closely together: **law enforcement agencies** (e.g. police, customs and courts), **researchers in social sciences and humanities**, **technology developers**, **cultural heritage institutions**, **civil society organizations** and **educational communities**. Civil society can act as a bridge, helping these groups communicate effectively with **EU and national policymakers**. It should be active both online (with a secured shared space working on already existing platform such as the ANCHISE one) and **in-presence** (facilitating events and workshops concretizing the formalized network).

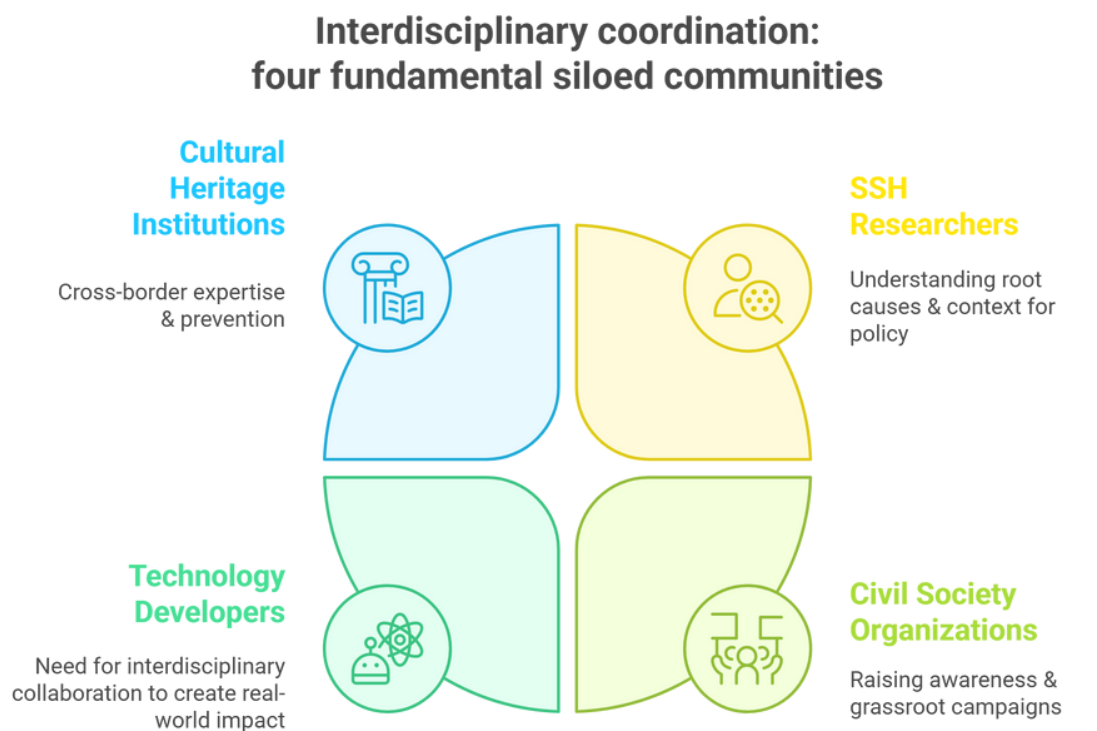
The Centre will focus on eight main objectives.

1. **Observatory:** monitoring, analysing and mapping the situation, advancing Social Science and Humanities research and acting as a think tank.
2. **Research and Development:** creating shared data standards, building a toolkit of proven technologies like AI and blockchain, running pilot projects with museums, and providing expert advice on policy and legislation.
3. **Community Engagement and Orientation:** connecting all actors in a permanent European network, sharing knowledge and good practices, organizing events and training, and maintaining a secure online platform with up-to-date data and research.
4. **Awareness Raising:** running campaigns for the public, professionals, and young people; working with UNESCO and media to improve understanding of the issue; and producing high-quality training materials.
5. **Training and Capacity Building:** helping law enforcement and heritage professionals develop skills, supporting prevention strategies, and enabling access to funding and networks.
6. **Alert Rising:** developing user-friendly alert protocols to bridge gaps between the public and authorities, including a European Alert Website and alert protocols for cultural heritage protection professionals.

7. Crisis Management: working with interested European countries in close connection with Law Enforcement Agencies to develop protocols for anticipation, management, and post-crisis assessment phases.

8. Levels of gathering and coordination: operating at both European and national levels, convening representatives and coordinating strategy while supporting national hubs and scaling up their interdisciplinarity.

A clear governance model and strong links to existing platforms like ANCHISE will ensure the Centre is practical, inclusive, and ready to scale up over time.



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