Cultural Heritage Management

A Global Perspective

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Laws, Language, and Learning

Managing Archaeological Heritage Resources in Europe

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At the outset, it is useful to explain briefly what the subtitle of this chapter is understood to mean because in English discourse there is much terminology in use with sometimes very confusing meanings (see Carman 2002:5–25 for an exhaustive discussion). In addition, there are the various non-English discourses in Europe. First, my subject is "archaeological" as opposed to "architectural," "historic," or the even wider concept of "cultural." In most European discourses, there is a growing recognition that the totality of the historic environment should be considered—much like the holistic American concept of "cultural heritage"—rather than its traditional subdivisions along the lines of academic divisions. Sticking to "archaeological" is for practical purposes because in most of Europe there are academic differences, as well as strong legal and formidable organizational differences, between dealing with archaeology and with architecture or other aspects.

Second, I have kept in the concept of "heritage resource," although in Europe a distinction is generally made between the concepts of heritage and of resource: "heritage" is normally considered to be of concern to society at large; it is also a political and legal term. The same material substance may be described as a "resource" and then is considered to be something that is primarily relevant to archaeologists (see Carman 2002:18; Hunter and Ralston 1993:viii). Nevertheless, it is entirely possible to view heritage as a resource for the public.

Third, there is the concept of "management." By itself, the idea that heritage resources have to be actively managed is not new anymore, but it is different from the more static concept of "taking care of monuments," which is the literal translation of the terminology used in several European languages, for example, in German, *Denkmalpflege* (Willems 1999). It is a concept that is connected to systems of designation that are dominated by legal requirements and administrative procedures and that lead to such things as registers of protected sites, national "stamp collections" of monuments. This is, of course, the oldest form of dealing with the material remains of the past, setting sites, monuments, or

objects apart as something special and giving them legal status. It began in Sweden, which has Europe's oldest monuments act, dating back to 1666, and is intimately connected with the formation of nation-states and the need to (re)define national identities in post-Napoleonic Europe (Willems 2001:83–84). This work is still a very important activity in many countries, but it is increasingly supplemented, if not indeed replaced,[1] by various forms of management.

In Europe, there is by no means a universal concept of preserving archaeological heritage resources through management of the historic environment—comprising the material remains of the past—or by any other means, for that matter. That need not surprise, for there are vast differences among the 48 different countries on the continent.[2] There are a number of reasons for this, relating to historical developments over the past century or so, to academic and political traditions, legal systems, and communication or, rather, language.

It is not very useful to go into all of these differences in any detail, as there are some good recent overviews (Biehl et al. 2002; Kobyliński 1998, 2001). It is worthwhile, however, to examine briefly some of the reasons for differentiation in relation to managing heritage resources because these will surely also be relevant at the global level. In addition, this chapter will discuss some recent trends and current issues.

Different Approaches: The Three Ls

Behind the differentiation in approaches to heritage management are any number of causes, some of which are quite specific for particular countries. There are, however, some more general sources of differentiation that can be comprised under three headings: law, language, and learning.

Law

In 1984 Henry Cleere, in the introduction to his *Approaches to the Archaeological Heritage*, observed that until then there had been hardly any international debate on heritage management issues. An important reason for this may have been that until about that time managing the archaeological heritage was traditionally done only by systems of designation that are by definition specific to a country because they are regulated by its laws, administrative traditions, and procedures. That way of dealing with heritage has changed, but it is still true that there are several rather different legal systems (and ways of organizing society) that lead to very different approaches to managing heritage resources. The most evident, though certainly not the only one, is the difference between the Anglo-Saxon common law tradition, where society is self-regulating, and the Roman law tradition, where much depends on the state, which regulates society. A recent discussion between Jean Paul Demoule (2002a, 2002b) and Roger Thomas (2002) provides a wonderful illustration of the consequences of

this difference. Through the Napoleonic "civil code," Roman law has become dominant in many countries. Nevertheless, it should not be disregarded that there are still other law traditions, of which the Germanic law tradition that has survived in Scandinavia is equally relevant. For example, the rights of the king in Germanic law, as opposed to private ownership in Roman law, provides decidedly better opportunities for protecting the archaeological heritage.[3] There may be other relevant traditions, and at least one has ended abruptly. After the fall of the iron curtain, rapid privatization, the introduction of raw capitalism, and the abrupt abolishing of Communist laws on communal (cultural) property have in some cases led to catastrophes in heritage management.

Also relevant in this respect is that the European Union does not have a common policy where cultural heritage is concerned. In fact, harmonization of cultural legislation is even specifically excluded under article 128 of the Treaty on the European Union. There is, of course, the highly influential Malta Convention,[4] but that is a voluntary convention by the Council of Europe.[5] For information about the legal and organizational aspects of archaeological resource management in European countries, the Council of Europe maintains the European Heritage Network (HEREIN) website.[6]

Language

There has been regrettably little research into the effect of language on practices in both academic research and heritage management in archaeology.[7] Obviously, the English discourse is so dominant at the global level that it may seem to be the only one—especially to native speakers of English who often tend to have rather poorly developed language skills. An interesting analysis was done by Neustupný (1998), who defined "mainstream" and "minority" research communities in Europe. He terms as "mainstream" the larger groups (German, English, French, Russian, and Spanish). These are the communities that are big enough to have a full internal discourse on all relevant topics, so there is no immediate need to refer to outside sources or to participate in other discourses. For his "minority" communities that is not possible. Indeed, the Scandinavian, Dutch, or Czech "minority" communities traditionally have a very outspoken international orientation. The point is, however, that what happens inside a large community—with the exception of the English one—tends to remain there for lack of communication across the language border. A recent citation analysis of references to academic and professional archaeological literature (Kristiansen 2001) indicates that this phenomenon has been increasing over the past decade or so; there is a clear increase in the geographical constraints on citation, even in the smaller communities. The causes for this[8] may well have to do with the rapid growth of these communities in recent years, which at least in some cases can be attributed to the enormous growth of archaeological heritage resource management.[9] The increase in the number of publications per year is connected

to a decrease in their geographical scope and hence in the number and diversity of the international references.

The nature of communication is thus decidedly influenced by language communities and their size, and has given rise to distinct traditions in heritage management.

Learning

Academic traditions vary greatly throughout Europe. Within the European Union there will now be one uniform bachelor-master system,[10] and the EU's Erasmus program facilitates exchange between universities. That does not at all mean, however, that there will be any convergence or common standards in the training of archaeologists working in heritage management. Nor does it mean that the existing power structures in academia at the national level will necessarily change. These aspects are of considerable influence on different ways of thinking about heritage management and on theorizing it (insofar as that is at all an issue). A totally different aspect relates to conservation and restoration, which in Europe are often taught at polytechnics or similar higher educational institutions.[11]

The fact that different approaches to heritage management exist, and will continue to do so, does not mean that there are no discussions at the European level, or that European platforms or standards are lacking. Before turning to some of the trends in heritage management in Europe, it is useful to indicate briefly the latter (see also Willems 1999).

The major standard for heritage resource management was developed by the Council of Europe between 1988 and 1992 as a result of changing views, in the preceding decade or so, on heritage and consequently on how to improve its survival and role in society by incorporation in the spatial planning process.[12] That resulted in the Malta Convention. Some aspects of this standard have been broadened since then by the adoption of the Florence Convention,[13] although this is one of the areas where diversity becomes visible. In some countries this landscape convention is indeed seen as a kind of extension of the Malta Convention, but in many—if not indeed most—countries it appears to be dealt with by departments of agriculture or environment with, at best, limited involvement from the cultural heritage sector (cf. also Clarke 2001:106). Apart from these conventions that set a standard for archaeological heritage management as a whole, practical standards have also been developed by the Council of Europe, such as a core data standard for recording sites and monuments (Council of Europe 1999).

The European Union does not have direct influence on heritage issues, but it may take "incentive measures" to support programs and, more importantly, it has legislative powers that have an indirect impact. For example, since 1997 the EU legislation on environmental impact assessment includes archaeology,

so evaluations of the heritage resource potential can now be enforced even if adequate national legislation should be lacking. Although the European Union thus often provides the fuel (financing) for heritage work, the engine is maintained by the Council of Europe, which as an organization is actively concerned with cultural heritage in Europe. One of the latest examples is a forward study that was produced to contribute to the Fifth Conference of Ministers Responsible for the Cultural Heritage in Slovenia in April 2001 (Council of Europe 2001).

Within the discipline of archaeology, a platform for communication was created after the fall of the iron curtain by the founding the European Association of Archaeologists (EAA) in 1993. The EAA organizes annual meetings, where professional and heritage issues are always major themes, and it publishes a journal and a newsletter.[14] In 1999, this was complemented by the creation of a European organization for state archaeologists called the Europæ Archaeologiæ Consilium (EAC), which is a more formal platform for archaeological heritage issues.[15]

Current Trends and Developments

The above-mentioned "forward planning" study is interesting not only because it expresses the concerns of the Council of Europe with the role of cultural heritage,[16] but also because it contains a table showing what were perceived by some of the experts in its working group to be "broad trends in cultural heritage management." Table 16.1 summarizes some trends as they were perceived in 2000. Many of the same trends are also recognized in the various contributions to a workshop on the future of European archaeology that was organized in 2001 by the European Science Foundation (Kobyliński 2001) and other recent publications (for example, Darvill 2004). The new concepts mentioned in this table are to be added to the older concepts; they are not seen as replacing them. The four main headings provide a useful framework to discuss current trends and developments.

As far as the definition of heritage is concerned, there is indeed a clear development toward contextualizing individual sites and monuments as part of a larger whole—the historic environment—and toward a realization that the sustainability of that larger whole, rather than the conservation of individual monuments or sites, is a key objective of heritage resource management. While the recognition as such, and the conceptual change that it implies, is broadly accepted, the major problem that exists with this approach is that in many countries there are deficiencies both in the legal framework and in the organizational structure to put this into practice. Nevertheless, the approach is being increasingly adopted, as is evident from recent overviews from a sizeable number of European countries.[17] Indeed, the idea that heritage resource management

Table 16.1. Broad Trends in Cultural Heritage Management

Theme	From (old concept)	To (new concept)
Definition of heritage	Monuments	Landscapes
	Buildings	Urban areas
	Sites	Historic environment / cultural heritage
Role of heritage in society	National unity	Respect for cultural diversity
	Generate revenue from visitors	Wider economic benefits/ social benefits
- Decisions	State	Region/locality
	Authoritarian	Democratization Participation
- Professionals	Experts	Facilitators
	Single discipline (e.g., buildings, archaeology)	Multi-skilled professionals
	Historical knowledge	Management skills
Significance	Old	Industrial heritage
Postwar buildings		
	Aesthetic	Commemorative value
	National importance	Local distinctiveness
	Monocultural	Values of different cultures
	Narrow range of values	Wide range of values
-Interpretation	Expert led	Community led
-Responsibilities	State led	Communities
The market/private sector		
	Heritage sector	Environmental sector
Management practices	Designation	Characterization
	Separate conservation	Integrated conservation
	Site based	More strategic
	Technical research	Philosophical research

Source: Council of Europe 2001

should in fact be understood as "the management of change" has taken hold and is intimately connected to changes in management practices.

In the 1990s, ideas were developed about the need for a historically founded linking of the management of characteristic landscapes to specific forms of land use and about a rejection of the concept of national parks as a means to preserve some areas at the expense of others: "The idea of the landscape reserve is perhaps one of the clearest mirrors of the western, dissociated and alienated treatment of the past in the landscape" (Kolen 1995:155).[18] The volume edited by Fairclough and Rippon (2002) contains many examples of how site-based heritage protection is rapidly being replaced by more strategic approaches that involve the management of their context and are in alliance with "green" environmental concerns (cf. Macinnes and Wickham-Jones 1992). At the base of this change lies a shift from systems of "designation" to the "characterization of heritage resources." It is not only the individual site or monument any more that is

valuated and being dealt with, receiving a status in accordance with its ascribed value. Instead, the historic environment is being studied, evaluated, and defined in terms of its history and its present-day relevance to people. There seem to be two interrelated approaches. One is the "historic landscape characterization" developed as a heritage management tool in the United Kingdom, whereby the historic and archaeological dimension of the present-day landscape is defined in order to explain how and why the landscape is what it is today, to identify its time-depth, and to facilitate sustainable management.[19] Another is the concept of the "cultural biography" of a landscape, monument, or object, an analysis from a long-term perspective on transformations of meaning until the present day, which makes visible all kinds of relationships, causes, effects, and contexts. As was recently concluded on the basis of a study making use of this notion, its potential for heritage resource management has not yet been explored fully, especially for English discourse; its exploration is further advanced elsewhere.[20]

The approaches discussed above have also led to a trend toward integrated conservation projects, where professionals with different expertise, such as architects, landscape architects, archaeologists, or planners, work together on joint projects. This trend would seem to be a preferred option, as the alternative of multi-skilled professionals, advocated by some, seems to be a very questionable development. Integrated projects are still a relative novelty in the countryside; in urban settings there is already much experience with integrated projects (Andrikopoulou-Strack et al. 1997; Council of Europe, ed. 1999; Horn et al. 2004). Recently, an project called APPEAR, which was sponsored by the European Union, focused on the urban heritage.[21] This project studied the conservation, integration, enhancement, and exploitation of urban subsoil archaeological sites in a sustainable way so as to make them available to the population. It produced a "guide" that is essentially an integrated action plan for the completion of accessibility projects at each stage in their development. It includes methodological and practical resources for identifying and implementing specific solutions for the conservation, integration, enhancement, and exploitation of archaeological sites in an urban setting. An "existing practices" database provides end users with a descriptive inventory of European accessibility projects. It offers them examples and references to be used to help them make choices with regard to their own projects. An important part of the project is concerned with the physical conservation of excavated remains.

In recent years, there has also been an increase (also financed by the European Union) in technical research on the preservation of unexcavated, in situ remains, for which the term "environmental archaeometry" is sometimes used (Friberg 1996; Jans 2005; Kars 1997; Kars and Kars 2002). Heritage resources are assumed to be best preserved in situ, but so far this remains a largely untested assumption. Only wetland sites, as a special category, have received much special attention.[22] The same research also provides insight in the conservation of

unexcavated sites by using the state of preservation of in situ organic remains as an indicator.

A third development in management practice that should be mentioned is caused by political changes involving increased privatization and belief in allowing market principles to operate in almost all sectors of what used to be the public domain. This has led to the development of standards and mechanisms for quality assurance. In many European countries, the advent of commercial archaeology in the last 10 to 15 years has led to concerns about the quality of archaeological work that were virtually lacking when archaeology was only an academic discipline.[23] The stated reasons for these concerns are similar everywhere. Commercial archaeology becomes possible when there is an obligation to take archaeological remains into account in development projects and at the expense of the developer. The developer thus has an interest in the work being done, but the quality of the result of that work is only relevant in terms of time and money, not in terms of the quality of the end product, which is knowledge about the past.[24]

The absence of private interests in the quality of the end product in combination with the particular character of the archaeological work, a knowledge-based line of business, makes it difficult to use a quality control approach from other types of work. In European archaeology, various approaches are being explored to provide mechanisms that assure quality. One aim is guaranteeing a basic level of performance by quality assurance of the process or methodology. This may include voluntary or enforced standards and guidelines for archaeological contract work, codes of conduct, and the like.[25] A certain level of quality may also be assured by maintaining or creating a state monopoly that excludes a role for the developer and keeps the entire process outside economic competition (Demoule 2002a) or by two types of mixed systems such as in Sweden (Holm 2000; Magnusson 2005; Säfvestad 2004) and in Germany.[26] In Sweden, there is a strong emphasis on providing academic input in private enterprise in archaeology, while "private enterprise" itself is largely limited to a state organization that has to work commercially. Germany represents another type of mixture because it is a federal republic and each of the German states has its own laws and regulations so that fully commercial systems with government agencies responsible for quality control exist side by side with full state monopolies.

Another approach aims at guaranteeing the quality of the product—the content and relevance of the academic output, and its contribution to our knowledge about the past. Where commercial archaeology is kept at bay—either fully or partially—this is normally considered to be the responsibility of the organizations charged with the work. In other systems, a variety of instruments are involved, such as research agendas and peer review systems. A related issue is the way in which systems of quality control are being supervised. They can be

almost entirely voluntary, or they can be enforced through a system of certification and accreditation, through a licensing system, through an inspectorate, or by means of a combination of such regulators.

Turning to the role of heritage in society, the most important development that has had a very strong influence on heritage resource management and indeed on society as a whole is decentralization. During the rise of the nation-state in the nineteenth century, existing regional units became less important, often by force, to accomplish national unity. Now, within the European Union, there is a decline in the sovereignty of the states, while regional and local identity and autonomy become increasingly important; this is what in Europe is known as "the Europe of the regions." Concomitant developments are a growing respect for cultural diversity and for local interests. This, of course, is reflected in heritage management, which is now rapidly moving away from fairly authoritarian and centralized decision making toward concerns for social inclusion and involving local stakeholders and communities in dealing with the historic environment. This occurs, not only because stakeholders and communities have a big influence on the sustainable preservation of that environment (Fairclough 1999; McManamon and Hatton 2000:10), but also because it is generally recognized that they have a stake.[27] As it is worded in recent texts by the Council of Europe, this is about "cultural rights" or "rights to the heritage" (Pickard 2002:18). There are instances in Europe where this involves an "indigenous" population, such as the Saami in the Nordic countries, but it can be any minority group or "just" the local population.

This development is in some ways similar to developments in English-speaking continents—North America and Australia—where heritage resource management is coming to terms with its past, and relations with indigenous peoples have undergone fundamental changes. Its roots are different though, and in the United States they go far beyond involving the local/indigenous populations and respecting their interests. At least in continental Europe[28] such developments are often considered with suspicion, especially where "decolonizing the practice of archaeology" seems to entail a flight from objectivity into extremes of cultural relativism for the sake of political correctness.[29] Of course, there remains a difference between respecting the views of the local/indigenous populations and those involved in what Skeates (2000:99) and Schadla-Hall (2004) have recently termed "alternative" interpretations of archaeology. In general, post-processual thinking in archaeology has of course also had an influence on changes in practices and the role of heritage, although the theoretical foundations of heritage resource management seem to remain largely in a more processual perspective.[30]

It should be noted that the process of decentralization has not only led to changes in the role of heritage in society, it has also had some negative effects

on heritage management in European countries. For example, it has begun to lead to the demise of central organizations that were able to support specialized expertise that is not commercially viable and cannot be maintained at the local level either. Another—admittedly more disputable—disadvantage is that the authority to decide comes to reside where there is no capacity, competence, or even interest to do so. On average, it seems that middle levels of government (such as the English county or the German Kreis) are better placed than lower levels (municipalities), with the exception of major towns—which in Europe usually have important historic centers.

One aspect of heritage that has become particularly relevant in Europe since the 1990s and the war in the Balkans, where heritage became a target,[31] is that the resource "is always in dispute, between countries, between regions, between different stakeholders" (Howard 2003:212). As Mathers et al. (2005) have recently demonstrated, there are many different aspects to valuing and determining the significance of archaeological heritage. It seems, however, that two issues have become especially important in recent years, incorporating a wide range of values when making a judgment, and including values of different cultures. In "Council of Europe speak," safeguarding the diversity of distinctive European heritage "requires mutual understanding, respect and recognition of the cultural values of others, particularly in relation to the cultural identities and heritage of minority and vulnerable groups" (Pickard 2002:19). In addition, there is increasing attention for heritage resources representing conflict and/or contested symbols. Often that is a very difficult task. It is one thing for English Heritage to develop policies for recent "monuments of war" in England (Schofield 1998), which broadened the horizon for archaeological heritage management but at the same time—in principle—still fits into a "nationalistic" or in any case traditional approach to heritage. It is quite another for German heritage managers to deal with buried remains of Third Reich buildings and installations in Berlin in a sensitive manner (Kernd'l 2002). Recognizing their significance as a token from an unpleasant past takes both courage and sensitivity because it is easily confused with other aims or (consciously) misinterpreted as such.

Of course the trends and developments discussed in this chapter represent only a limited number of aspects of archaeological resource management in Europe. There are characteristic traits and presumably specific issues in each country that could enrich the international discourse, but very often remain at the national level. Contrary to what might have been expected, there is in particular a lack of discussion between southern and northern Europe, rather than between eastern and western Europe. Achieving a higher level of participation in discussions of pan-European and indeed global interest may well require another decade of international cooperation.

Notes

1. My own country, the Netherlands, has recently become a case in point when the new government in 2004 declared a moratorium on new archaeological and built monuments; the usefulness of the current register is to be examined, and management through the instruments of spatial planning is strongly advocated.

2. There are 46 member states (and one candidate member) of the Council of Europe, plus the Vatican.

3. For example, in countries that have been influenced by the French Code Civile, anything below the surface belongs to the owner, in theory extending down to the center of the earth, unless a specific exception is made by law. In countries that have retained Germanic law, anything below the surface in principle belongs to the Crown.

4. The official title is European Convention on the Protection of the Archaeological Heritage (Revised). It was opened for signature in 1992 and has currently been ratified by 26 countries.

5. It is important to note that the Council of Europe is a purely intergovernmental organization of all European countries. The European Union is very different: it is a supranational body with common institutions to which its 25 member states have delegated part of their sovereignty. On the role of the Council of Europe with respect to cultural heritage, see Pickard 2002.

6. The European Heritage Network (Réseau Européen du Patrimoine) can be found at http://www.europeanheritage.net/sdx/herein/index.xsp. Other additional countries are covered by http://www.planarch.org. See also http://www.heritagelaw.net.

7. Since this was written, the subject has received considerable attention. In 2007, the *European Journal of Archaeology* 10(2–3) published a special double issue on "Communication in Archaeology," with several relevant papers. In addition, in 2008, a forum discussion was published in *Archaeologies* 4(1):164–200, on "Global Languages of Archaeology," with eight different contributions on the subject.

8. See also the discussion in Kobyliński 2001:44–46.

9. Published examples are the Netherlands, where the number of full-time equivalents (FTEs) in jobs for archaeologists has quadrupled in the last decade (Bloemers 2005; Willems and Brandt 2004: introduction), and Ireland (O'Sullivan 2003).

10. This is the result of the so-called Bologna process that started in 1999 (see, for example, http://www.bologna-bergen2005.no/). For some implications, see Bloemers 2005; Eggert 2005.

11. For an overview not covering the whole of Europe, see http://www.encore-edu.org/.

12. See Council of Europe 1987 and 1989 for conference reports and 1992 for the text and explanatory report of the convention. Many texts are downloadable through the portal at http://www.coe.int. Although an attempt was made in the 1980s, the Council of Europe never succeeded in producing a convention on the underwater cultural heritage.

13. For the European Landscape Convention, see Council of Europe 2000. The

convention was opened for signature in 2000 and has meanwhile been ratified by 18 countries. Other relevant European conventions are the European Convention on Offences Relating to Cultural Property (Delphi Convention) and the Convention for the Protection of the Architectural Heritage of Europe (Granada Convention), both of 1985.

14. See http://www.e-a-a.org; Marciniak 2000; Willems 2002. The *European Journal of Archaeology* (*EJA*) has been published since 1993 and there is a regular newsletter, *The European Archaeologist* (*TEA*).

15. See Willems 2000. The EAC does not yet have a website.

16. As explicitly worded by its director general for culture, see Weber 2001. It was a U.K. group that drafted the table (Clarke 2001), so it contains some elements that may well reflect particular Anglo-Saxon or U.K. views or concerns, but in my opinion it is most certainly of general relevance for trends in Europe.

17. See Fairclough and Rippon 2002 for overviews from a substantial number of European countries with many further references. A discussion of legal frameworks is in Prieur 2002.

18. Kolen 1995:155. On this subject, see also Kristiansen 1992, both with further references.

19. See Fairclough et al. 2002; Darvill 2004, both with further references.

20. Yates 2005:134; see however Kolen 2005 and Bloemers 2002:94 on a research program developed to do just that. For earlier discussion (in English) on the notion of cultural biography, see various contributions in the *Archaeological Dialogues* 6(2) (1999).

21. http://www.in-situ.be./A_pres_overview.html.

22. For an excellent overview of the management of wetland heritage resources in Europe, see Coles and Olivier 2001. Of particular relevance for this aspect is also the Ramsar Convention (Ramsar Convention 2004), which nowadays gives much more attention to the cultural aspects of wetlands; see http://www.ramsar.org/.

23. For a recent overview, see Willems and van den Dries 2007.

24. See Cumberpatch 2000 for a critique of the U.K. system with its primacy of the interests of the developer.

25. The most developed systems are those in the United Kingdom and in the Netherlands (Institute of Field Archaeologists 1999; Willems and Brandt 2004).

26. For Germany, which is a federal state, see Verband der Landesarchäologen in der Bundesrepublik Deutschland (1994) (this is the standing conference of state archaeologists in Germany).

27. While this has become increasingly common, it does not mean that there is agreement on views that "everyone, whatever their interest, has a stake" (Fairclough 1999:131) (cf. note 28).

28. In England, the appropriation of monuments and their interpretation by New Age groups seems to have received at least some measure of official recognition.

29. See Arnold 2000 for an insightful comparative analysis of American and European (in particular, German) perspectives. Also Skeates 2000: chapter 5.

30. See the recent discussion between Moss 2005 and Hegmon 2005, which also relates to theory and CRM.

31. Golden 2004 offers an analysis of similar situations.

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