

# ICOMOS

INTERNATIONAL COUNCIL ON MONUMENTS AND SITES  
CONSEIL INTERNATIONAL DES MONUMENTS ET DES SITES  
CONSEJO INTERNACIONAL DE MONUMENTOS Y SITIOS  
МЕЖДУНАРОДНЫЙ СОВЕТ ПО ВОПРОСАМ ПАМЯТНИКОВ И ДОСТОПРИМЕЧАТЕЛЬНЫХ МЕСТ

Our Ref. GB/AS/EG/1669/IR

Charenton-le-Pont, 20 December 2021

H.E Ms Gülnur Aybet  
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Plenipotentiary, Permanent  
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Permanent Delegation of Turkey to UNESCO  
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## World Heritage List 2022

### Gordion (Turkey) – Interim report and additional information request

Dear Ambassador,

As prescribed by the revised *Operational Guidelines for the Implementation of the World Heritage Convention* and its Annex 6, the Advisory Bodies have been requested to submit a short interim report for each nomination by 31 January 2022. We are therefore pleased to provide you with the relevant information outlining issues related to the evaluation process.

The ICOMOS technical evaluation mission to “Gordion” was carried out by Ms. Cynthia Dunning (Switzerland) from 2 to 8 August 2021. The mission expert highly appreciated the availabilities and support provided by the experts in your country for the organization and implementation of the mission.

On 30 September 2021, a letter was sent by ICOMOS to request further information regarding the historical context, comparative analysis, documentation, protection, planning framework and planned development, and management system. Please convey our thanks to all the officials and experts for the additional information you provided on 12 November 2021 and for their continued cooperation in this process.

At the end of November 2021, the ICOMOS World Heritage Panel evaluated the cultural and mixed properties nominated for inscription on the World Heritage List in 2022. The additional information provided by the State Party, together with mission and desk review reports were carefully examined by the Panel members. This process will conclude in March 2022.

We thank you for the availability of your Delegation to the meeting held on Saturday 27 November 2021 with some representatives of the ICOMOS Panel. The exchanges during this meeting were of great help for the third part of the ICOMOS Panel meeting. During the last part of the meeting, the Panel has identified areas where it considers that further information is needed.

Therefore, we would be pleased if the State Party could consider the following points:

### **Documentation**

The ICOMOS Panel would appreciate if the State Party could clarify some aspects of the nominated property that have not emerged clearly from the nomination dossier or from the additional information submitted in November 2021. The nomination dossier mentions a long period of occupation for Gordion between 2500 BC and 1400 AD, although the period for which the site is nominated and for which tangible evidence has been found extends from the emergence of the Phrygian presence to the Persian takeover, around the fall of the Hittite Empire to the Persian takeover of the region.

ICOMOS would appreciate if the State Party could provide clarification with absolute dating to contextualize the emergence of the Phrygian Kingdom, as well as timelines with indications of the milestones of the Phrygian Kingdom and the Phrygian centres, and of those of other comparable and competing powers which would serve well the purpose of placing it in its relevant wider historical, cultural and geographical context. It would be equally useful for ICOMOS to receive historical maps showing the extension of the Phrygian influence in relation to their neighbouring powers over the centuries. Some indication on the chronology of the main attributes found in the archaeological excavations at Gordion and in comparable structures located at other sites of contemporary civilizations would also be welcome.

ICOMOS wishes to understand better the layout of the site and of its different areas. Therefore, ICOMOS would appreciate if a more detailed set of maps, at a larger scale, including the plans of the structures that have emerged through excavations and are still preserved, could be provided by the State Party. More detailed maps can focus on a specific area if combined with general maps to facilitate their reading.

The nomination dossier describes both early and middle Phrygian layers with related structures. However, it is difficult to determine whether the structures of both layers remain or whether progressive excavations have removed the later layers and related structures. The ICOMOS Panel would appreciate to receive additional details on this aspect. Clarifying whether structures of all Phrygian periods that represent exceptional attributes of the proposed Outstanding Universal Value are still standing in the Citadel Mound is crucial for confirming the potential of the nominated property to meet the *Operational Guidelines* requirements on integrity and authenticity.

### **Boundaries**

#### *Nominated property*

With regard to the boundaries, the ICOMOS Panel considers that it would be extremely beneficial for the integrity of the nominated property to extend its boundaries to the south to include Tumulus 67, currently located at the limit of the buffer zone, and which belongs to the same group of tombs, T52 to T66, forming a southward line. Should it be included in the nominated property, the boundaries of the buffer zone would also need to be adjusted. This extension would also involve a change to the 1st degree archaeological conservation area, which could take a long time to complete due to the administrative steps required to change the maps. However, ICOMOS would appreciate receiving information and a tentative timetable for the implementation of these adjustments.

The fortifications of the Phrygian settlement define the north-eastern limits of the nominated property. Between Kuştepe and Küçük Höyük, the course of the fortifications has not been identified precisely yet (because it is under a very high amount of river gravel deposits). The boundary of the property at this location is very near to the supposed walls; it would seem therefore relevant to expand the boundaries in this area, on the basis of non-destructive testing.

### *Buffer zone*

The ICOMOS Panel has noted that the buffer zone of the nominated property would need to be adjusted in two areas. The first adjustment is directly linked to the proposed change of boundary of the nominated property to include tumulus 67. The second one concerns the north-western corner of the buffer zone, which currently excludes an important area that would be relevant for the understanding of the waterway and the road access to the Gordion landscape from the north-west. Therefore, ICOMOS suggests that the boundary of the buffer zone be extended to follow the lower part of the ridge to the left-hand side of the Porsuk canal where it enters the Sakarya River.

### **Protection**

The ICOMOS Panel notes that a large portion of the nominated property – some 40% of it coinciding with the area of the outer town – is not covered by the 1<sup>st</sup> degree archaeological conservation area but only by 3<sup>rd</sup> degree. In ICOMOS view the nominated property as a whole should be designated as 1<sup>st</sup> degree conservation area. This would ensure a stronger protection of the underground remnants of the outer town of Gordion and regular patrolling.

The Panel also noted that the same area does not seem to be covered by any specific conservation / master plan. Since the protection level is only 3<sup>rd</sup> degree, this implies that development may occur there if duly authorised by the heritage authority. ICOMOS would be pleased if the State Party could provide information on regulation or other type of designations concerning this area of the nominated property.

Further information on legal provisions and planning mechanisms implemented in the buffer zone would also be very important.

The ICOMOS Panel understands that 54% of the nominated property is located on private or partly private land. This may pose challenges in relation to effective protection, particularly for tumuli located in agricultural exploited fields, as they are threatened by continuous ploughing. ICOMOS understands the needs of the farming community living in the area, who also contributes to the preservation of the landscape of Gordion and is key for the socio-economic sustenance of the region. However, solutions and mechanisms should be envisaged by the State Party in consultation with the community to address both the needs of the community and the protection of the archaeological potential of the site. In this regard it would be useful to understand better what steps are envisaged to address this issue and what are the priority and timeframe for their implementation.

The road through the village of Yassihöyük running near the Tumulus T5 carries heavy traffic and causes destabilisation phenomena. The ICOMOS Panel understands that plans are in place to divert the road and the heavy traffic elsewhere. Further information on this project and on the timeframe for its implementation would be welcome.

ICOMOS notes that a visitor management plan for the Tumulus MM is urgently needed, to ensure its indoor environmental parameters remain stable to guarantee the preservation of the rare and important ancient wooden structures preserved therein. In this regard, ICOMOS would appreciate to receive information on steps that might be already initiated by the State Party on this matter.

### **Looting**

Looting has been observed in the property and causes considerable concern. The ICOMOS Panel considers that this issue needs to be addressed promptly, particularly at the tumuli and the Citadel Mound where security measures should be put in place urgently.

### **Development projects**

The ICOMOS Panel is thankful for the additional information provided by the State Party on the plans related to projects that are already in place. While this has helped the Panel to better understand the situation, concerns remain with regard to the scale of expansion envisaged for the village, particularly with regard to the Special Project Area (ÖPA) for which developments related to thermal activities and tourism are envisaged. In this regard, the ICOMOS Panel would like to recall the importance of providing the World Heritage Centre with detailed plans for any development that may be planned.

The ICOMOS Panel understands that the Gordion Museum will quadruple in size, according to the plans developed by the Turkish Ministry of Culture and Tourism and by the Ankara Museum of Anatolian Civilizations, and that this renovated museum is planned to be built within the nominated property. In this regard, the ICOMOS Panel would like to underline that this type of development does not seem consistent with the protection needs of an archaeological area and that interpretation facilities are more suitably sited outside World Heritage properties. Hence, the ICOMOS Panel would like to receive clarifications as to whether the siting of the new museum has been decided in a definitive manner, as well as any plans and design details of the new museum that may exist already. ICOMOS would also like to remind the State Party that it is important to inform the World Heritage Committee about this project before any decision that might be difficult to reverse is taken (OG, paragraph 172).

### **Long-term management**

After decades of excavation, the management of the site now focuses on the conservation of the excavated areas. The ICOMOS Panel concurs that this is a fundamental step for the conservation of the nominated property and its proper presentation. The plan for conservation is a long-term undertaking and it is important that steady funding and highly qualified human resources continue to work at the site to achieve these long-term goals for conservation.

In this regard, the ICOMOS Panel wishes to draw the State Party's attention on maintaining long-term perspectives in management arrangements. It is understood that the State Party has been successfully collaborating with the Penn Museum for several decades. However, it is also to be noted that this cooperation is based on yearly renewal of agreements, according to Turkey's legal framework on archaeological research concessions. In the remote but not excludable case that such renewal may not be warranted in the future, it is important that the State Party commits explicitly to guarantee the sustenance of the management with adequate instrumental, human and financial resources needed for taking care of such an extensive site. ICOMOS would be pleased to receive the response of the State Party on this matter.

We look forward to your responses to these points, which will be of great help in our evaluation process.

We would be grateful if you could provide **ICOMOS** and the **World Heritage Centre** with the above information **by 28 February 2022 at the latest**, the deadline set out in paragraph 148 of the *Operational Guidelines* for supplementary information on nominations to be received. Please note that any information submitted after this date will not be considered by ICOMOS in its evaluation for the World Heritage Committee. It should be noted, however, that while ICOMOS will carefully consider any supplementary information submitted, it cannot properly evaluate a completely revised nomination or large amounts of new information submitted at the last minute. So we would be grateful if the State Party could keep its response concise and respond only to the above requests.

We thank you for your support of the World Heritage Convention and the evaluation process.

Yours faithfully,



Gwenaëlle Bourdin  
Director  
ICOMOS Evaluation

Copy to            Turkish Ministry of Culture and Tourism  
                         UNESCO World Heritage Centre