
Gordion (Turkey) No 1669

1 Basic information

Official name as proposed by the State Party

Gordion

Location

Polatlı

Ankara

Turkey

Brief description

Located in Central Anatolia, in an open rural landscape, the archaeological site of Gordion is a multi-layered ancient settlement, encompassing the remains of the ancient capital of Phrygia, an Iron Age independent kingdom. The key elements of this archaeological site include the Citadel Mound, the Lower Town, the Outer Town and Fortifications, and several burial mounds and tumuli with their surrounding landscape. Archaeological excavations and research have revealed a wealth of remains that document construction techniques, spatial arrangements, defensive structures, and inhumation practices that shed light on Phrygian material culture and economy.

Category of property

In terms of categories of cultural property set out in Article I of the 1972 World Heritage Convention, this is a *site*.

Included in the Tentative List

13 April 2012

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees' members and independent experts.

An ICOMOS technical evaluation mission visited the nominated property from 2 to 8 August 2021.

Additional information received by ICOMOS

A letter was sent to the State Party on 30 September 2021 requesting further information about the historical context of the nominated property, the comparative analysis, the documentation, protection, planning framework and planned development, and the management system.

Additional information was received from the State Party on 12 November 2021.

An Interim Report was provided to the State Party on 20 December 2021 summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the Interim Report including: additional documentation, expansion of the boundaries of the nominated property and its buffer zone at precise locations, protection arrangements, looting, development projects, and long-term management.

Additional information was received from the State Party on 25 February 2022.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

9 March 2022

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history, and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a summary of the most relevant aspects.

Description and history

Gordion is an archaeological site located in Central Anatolia, adjacent to the rural village of Yassıhöyük, in a steppe-like landscape, crossed south-north by the Sakarya River, some twenty kilometres south of its confluence with the Porsuk River.

The region where Gordion is located corresponds to ancient Phrygia, an independent kingdom which at its peak extended from the southern shore of the Marmara Sea to the northwest, to the territory delimited by the great bend of the Kızılırmak River to the east.

The nominated property bears witness to multi-millennial human occupation, from 2500 BCE to 1400 CE, and the larger area demonstrates human occupation up until the present day with little interruption. However, the major *in situ* remains revealed by decades of archaeological investigations are associated with the emergence and flourishing of the Phrygian culture, between the 10th and the 6th centuries BCE.

The nominated property, following the proposed expansion of the boundaries presented in the State Party's response to the Interim Report, has an area of 1,064 ha and a buffer zone of 4,430 ha.

The main areas of the nominated archaeological site comprise the Citadel Mound, the Lower Town, and a large area with a high density of tumuli, which are located outside the former fortified settlement. They are discussed below.

Citadel Mound

The mound, featuring a rather flattened top, rises about thirteen to sixteen metres above the plain, east of the current course of the River Sakarya; it covers about ten hectares. The excavated portion of the mound – about two hectares – has revealed monumental structures and their spatial organisation, which shed light on Phrygian culture. A monumental gate – named the East Gate – has been revealed on the south-eastern side of the mound. The Palace Area and the Terrace Complex include two large courts and megaron-type buildings of different and large sizes, attesting to the Phrygian capacity for building with timber as well as to sophisticated construction techniques.

The buildings in the Temple Complex have revealed rooms with remains of grinding stones and evidence of textile production, from wool spinning to weaving; adjacent rooms contain mudbrick-and-clay ovens and other cooking installations.

A disastrous fire, which occurred around 800 BCE, created a 'destruction level' marked by a thick layer of ash that preserved a wealth of precious and fine objects in the Palace Area: they shed light on the skills and taste of the Phrygians, during the Early Phrygian period.

The new citadel, constructed after that fire, was built as a single plan, at a considerably higher level, which required substantial efforts to raise the height of the mound. A new gate was built, supported by a stepped retaining wall which was constructed with multi-coloured blocks. The plan of the new citadel is largely similar to the previous one.

A building with elaborate mosaics adorning the floors of its rooms, named the Mosaic Building, was built in the 6th century BCE: the central room was possibly a throne or cult chamber.

Finally, a building named the Painted House was probably constructed around 500-490 BCE. The excavations revealed fragments of painted plaster and friezes decorated with human figures – mainly women but also athletes and birds. The friezes are rare depictions of Phrygian women. The building was probably a shrine of the goddess Matar.

The Lower Town, the Outer Town, and the fortifications

A large, residential area – roughly forty-five hectares – the Lower Town was protected by a massive fortification system, which included two forts, corresponding to the two mounds known as Kuştepe and Küçük Höyük, of which only the latter has been excavated, and square towers. The Lower Town was connected to an adjoining residential area to the west, known as the Outer Town.

Archaeological campaigns at both areas have revealed stone buildings on the east and smaller, mudbrick buildings on the west. Objects found during the excavations included hearths, ovens, grinding

implements, and other installations related to food processing. Archaeological evidence attests that around 700 BCE settlement activity ended by fire, and the area was subsequently used as a cemetery, known as the Common Cemetery, where members of the lower classes of Phrygian society were buried.

The tumuli and their surrounding landscape

Surrounding the Citadel Mound and the Lower and Outer Towns, more than one hundred tumuli – earthen mounds protecting the burials of the ruling class – dot the landscape of Gordion. Their size is variable, from small humps on the ground to large-scale mounds, such as the tumulus known as the Midas Mound (Tumulus MM), fifty-three metres high and 300 metres in diameter.

Several mounds have been explored archaeologically since 1900 and documented in publications.

The tumuli contain tombs ranging from the early Phrygian period (mid-9th century BCE) to the early Hellenistic period (late-4th century BCE). The earlier burials are usually inhumation-type whilst the cremation-type appeared later, around the 7th century BCE.

The wooden burial chambers all show similar layouts. The construction sequence included the creation of a rectangular pit, in which the tomb chamber was constructed by assembling and joining timber elements. After the body was placed in the chamber with its funerary equipment, the chamber was completed by a timber roof and then covered with stone and rubble.

The objects found in the largest tumuli included banquet sets of refined workmanship, in bronze and ceramic, but also personal items such as fibulae, textiles, and belts. The largest of this type of burial is Tumulus MM, which features a timber burial chamber measuring 5.15x6.20 metres, and 3.30 metres in height, covered with a pitched roof, resembling a Phrygian megaron. Juniper wood and pine wood were used to build the chamber and its construction was followed by the construction of the mound over it, for structural reasons.

Most of the finds and the structures that emerged from the excavations at Gordion pertain to the Iron Age. The Bronze Age level was explored through sample excavations, which yielded artefacts and structures suggesting a complex Bronze Age settlement.

Evidence suggests that the first phase of settlement came under the influence of the Hittites during the Late Bronze Age, until the collapse of that Empire, around 1200 BCE. An economic and cultural resurgence at Gordion is attested to in the Early Iron Age and reached its apogee under its King, Midas, around the 8th century BCE and continued until the mid-6th century BCE. Afterwards, Gordion fell under the influence of the Persian Empire.

Under the Persians, the administrative and public part of the citadel was remodelled: the Painted House belongs to

this period as well as several industrial and residential structures.

During the Hellenistic period (late 4th century BCE), Gordion became a large, multi-ethnic, and multicultural town.

Gordion's thriving life ceased suddenly in 189 BCE and it was only in the 1st century CE that it was refounded as a colony with a military function under Roman control. Subsequent periods of occupation are linked to the Byzantine and Ottoman presences.

The most recent phase of occupation of the area dates to 1920's when the village of Yassihöyük was founded and populated by families that moved there mainly from Bolu.

Upon ICOMOS's request, the State Party provided an expanded descriptive and historical narrative covering also competing powers contemporary with the Phrygian polity, that has assisted in better placing the Phrygian culture in its historical and geo-cultural context.

State of conservation

A long-term conservation programme has been in progress since 2011 and will continue for at least another decade to ensure the appropriate conservation and protection of the excavated structures and remains. The Gordion Archaeological Project (GAP), managed by the University of Pennsylvania Museum of Archaeology and Anthropology (hereinafter The Penn Museum), provides the necessary funds through donor schemes. The tumuli are overall in good condition, with the exception of the smallest ones, as they are prone to damage by ploughing. Tumulus MM has recently been the subject of careful structural stabilisation and conservation.

ICOMOS considers that the conservation programme developed by the State Party and its partners is crucial for securing the archaeological site and needs to be continued and supported by reliable financial and human resources.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation is acceptable but can be improved, particularly in excavated areas.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are looting, development plans within the vicinity of the buffer zone, the expansion of the Gordion Museum within the nominated property, deep ploughing, flooding and erosion, the latter affecting particularly the mounds. Tumulus MM is threatened by the heavy traffic on the nearby main road. Plans for the rerouting of the road are prioritised in the management plan. In response to the Interim Report, the State Party explained that the initial plans to divert the road have been

converted into a less intrusive approach, based on traffic speed reduction devices (bumps) on the existing road.

ICOMOS considers that urgent measures are needed to prevent looting, including upgrading the protection regime of the part of the nominated property currently covered by the 3rd degree archaeological conservation area to the 1st degree, to ensure the same strict level of protection and control to the whole of the nominated property.

Equally important is to find appropriate solutions that can meet the needs both for protection of the buried archaeological remains scattered in the fields and for the local farmers to continue to practice compatible agriculture, an activity that, so far, has contributed to preserving the landscape of the archaeological site.

ICOMOS notes the scale of development envisaged for the village of Yassihöyük, particularly the Special Project Area (ÖPA), for which thermal and touristic facilities are planned, is sizeable, taking into account the dimension of the village and its socio-economic profile.

ICOMOS is seriously concerned about the plans for upgrading and quadrupling the size of the Gordion Museum, which is planned to be built within the nominated property. This type of development is not consistent with the protection needs of the nominated property and it is recommended that a different location be identified for this new infrastructure.

In response to the ICOMOS Interim Report, the State Party replied that concrete plans for development in the village are not currently being considered, but should this happen in the future, consultation will be activated as well as impact assessment mechanisms, as prescribed by paragraphs 172 and 118bis of the *Operational Guidelines for the Implementation of the World Heritage Convention*.

The State Party also clarified that a project for a new museum was approved by the Ankara Regional Conservation Council for the Protection of the Cultural Heritage Properties in 2017. However, the implementation of this project is not yet envisaged and not included in the 2022 budget for investment.

Finally, the State Party explained that, while the management bodies of the nominated property agree that local farmers should not be disadvantaged by the existence of the archaeological site, urgent measures are needed to protect the archaeological remains, including fencing, signage, and awareness-raising.

ICOMOS observes that a strategy to support farmers and their livelihood is necessary to ensure the effectiveness of envisaged measures for archaeological protection. Direct or indirect support and/or compensation mechanisms would need to be explored in dialogue with local farming community members. Developing possible additional heritage-related economic opportunities targeting farmers who may be more significantly negatively affected by restrictions on farming activities would also need

exploration, including prioritising the restoration of old houses in the village for residents and visitors alike.

ICOMOS further observes that it would be advisable to monitor the Sakarya and Porsuk Rivers and related canals system.

ICOMOS considers that the state of conservation is acceptable but would need to be improved, particularly in excavated areas. The State Party has prepared a long-term conservation programme, the implementation of which is crucial for the property. Main factors affecting the nominated property are potential urban development, especially tourism-related infrastructure, looting, deep-ploughing, flooding and erosion. In order to tackle effectively these factors, careful consideration should be given to relocating the planned new museum; to the current scale of permissible development in the village; establishing proactive mechanisms against looting, including strong awareness-raising campaigns targeting multiple audiences and particularly the police; as well as strategies to support farmers affected by archaeological restrictions on farming in sensitive archaeological areas.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- Gordion is one of the most important historical centres in the ancient Near East, with a long and complex sequence of human occupation spanning some 4,500 years, from the Early Bronze Age until 1400 CE.
- Gordion was the capital of the Phrygian polity and, after seventy years of archaeological research, with its wealth of still-unexcavated structures and remains, is a key site for understanding the Phrygian civilisation, and its technological achievements in construction and textile production.
- An unusually high density of burial tumuli surrounds the former town, some of which count among the largest in the world. Tumulus MM preserves inside it the oldest known still-standing wooden building, along with a precious collection of ancient furniture.

Based on the nomination dossier and the additional information the key attributes of the nominated property include the East Gate, the Citadel, the Lower Town, the Outer Town and their fortifications, the tumuli, particularly Tumulus MM, and the surrounding archaeological landscape. Within the Citadel, major attributes relate mainly to the Early and Middle Phrygian periods and include the East Gate, the Terrace Complex with its Megarons, the Terrace Building, the CC ("Clay Cut") Building, what survives from the New Citadel, built after the great fire (circa 800 BCE), and the Mosaic Building; and the Painted House, dating back to the Late Phrygian period. The Lower and Outer Town, which have only been

partially archaeologically explored, preserve undisturbed remains from different Phrygian periods. The landscape setting of Gordion, shaped by the Sakarya River, its expansive steppe-land appearance dotted by hills, natural and human-made mounds, and its rural character, is inextricably linked to the nominated property and its historic development. The visual and archaeological connection of the nominated property with its setting is a crucial attribute that supports the understanding and the enjoyment of the archaeological site of Gordion and of its heritage significance.

Comparative analysis

The comparative analysis has been developed on the grounds of other settlements located in Anatolia that have yielded Phrygian material, and has also considered other important ancient Anatolian centres with comparable chronology, including sites on the World Heritage List and the Tentative List of Turkey.

ICOMOS noted that the comparative analysis presented in the nomination dossier is far too limited in terms of geo-cultural scope and asked the State Party to expand the comparative analysis to examine properties and sites in the wider relevant geo-cultural context.

In the additional information received in November 2021, the State Party expanded the comparative analysis, but only focused on the tumuli. The properties included within the augmented analysis have been drawn from all regions of the world, although a deeper analysis was carried out for sites in the Balkans, Central and Mediterranean Europe, and in Anatolia, on the World Heritage List, on Tentative Lists of States' Parties, as well as other sites.

ICOMOS considered the augmented comparative analysis useful, although not completely satisfactory, and, in its Interim Report, asked the State Party to further expand the context of the Phrygian culture in comparison with other competing powers.

ICOMOS observes that, in its analysis, the State Party did not consider enough relevant comparable properties in the wider region such as Ashur (Qal'at Sherqat) (Iraq, 2003, criteria (iii) and (iv)), the first capital of the Assyrian Empire; or Babylon (Iraq, 2019, criteria (iii) and (vi)), a long-lasting ancient city and capital of successive empires; or Susa (Iran, 2015, criteria (i), (ii), (iii) and (iv)). From the Tentative Lists, the State Party could have examined Nimrud and The Ancient City of Nineveh (Iraq, Tentative List), both serving as capitals of the Assyrians, or Nippur (Iraq, Tentative List), a site bearing witness to 6,000 years of continuous occupation and Sumerian, Akkadian, and Parthian cultures.

However, based on the additional information provided by the State Party, ICOMOS considers that, despite the weaknesses in the comparative analysis, Gordion reflects in an exceptional manner, through its tangible attributes, associated archaeological vestiges and *in situ* remains, and the preserved condition of its surrounding landscape, the Phrygians, an advanced Late Bronze and Iron Age

civilisation which developed in Anatolia and excelled in timber construction, wood carving, and metalwork.

ICOMOS considers that the comparative analysis justifies consideration of this property for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated based on cultural criteria (iii), (iv) and (vi).

Criterion (iii): *bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;*

This criterion is justified by the State Party on the grounds that Gordion offers today the best preserved and documented testimony to the Phrygian civilisation. As the capital city of the Phrygians, the site preserves remains of monumental architecture and of large-scale production areas, a well-preserved destruction level (800 BCE) in the citadel, which ensured the preservation of thousands of artefacts and not only of built structures, and numerous wealthy tombs offering exceptional insight into the Phrygian culture.

ICOMOS considers that the additional information provided by the State Party on the surviving structures and archaeological layers from both the Early and Middle Phrygian periods has clarified that the former period is more extensively represented in excavated areas than the subsequent one, particularly at the Citadel. However, the Middle Phrygian layer survives either reburied in the Lower Town or still unexcavated, particularly in the Outer Town. Where excavations have been carried out, these have been carefully recorded and documented, and finds have been removed and catalogued.

ICOMOS considers that the *in situ* archaeological remains – both excavated and unexcavated, suffice in terms of attributes to support the demonstration of criterion (iii).

Criterion (iv): *be an outstanding example of a type of building, architectural or technological ensemble, or landscape which illustrates (a) significant stage(s) in human history;*

This criterion is justified by the State Party on the grounds that Gordion is an unequalled architectural statement of royal power and technological achievements in building construction (megaron-type buildings, burial chambers in the tumuli, particularly Tumulus MM), decoration (mosaics and painted decoration), and textile production. Several achievements attest to the ingenuity of the Phrygians: the first known example of coloured stone mosaic; some of the earliest known and elaborately decorated roof tiles; imposing royal burial mounds with wooden inner chambers attesting to the exceptional skills of Phrygian carpenters; the most elaborate wooden furniture known from antiquity; and refined skills in bronze metalwork.

ICOMOS considers that the State Party has referred to individual attributes, as well as to movable artefacts, to

justify different facets of this criterion, namely building typology, architectural ensemble, or technology. ICOMOS observes that the whole nominated property should justify this criterion and not just individual elements of it. ICOMOS further considers that movable artefacts, although closely related to the nominated property, cannot be seen as attributes supporting the justification of criteria.

Finally, ICOMOS does not consider that the comparative analysis, even in its augmented form, supports the justification for this criterion.

Criterion (vi): *be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance. (The Committee considers that this criterion should preferably be used in conjunction with other criteria);*

This criterion is justified by the State Party on the grounds that Gordion is directly associated with the Gordian Knot described in ancient written sources and cut, according to the legend, by Alexander the Great of Macedon, who fulfilled an ancient prophecy and demonstrated his capability to master Asia.

Gordion is also associated with King Midas, who ruled over the Phrygian kingdom in the 8th century BCE and was so renowned in antiquity for his immense wealth that a legend arose that he could turn into gold whatever he touched.

ICOMOS considers that the two legends linked to Gordion cannot be considered as enduring living traditions or beliefs. Although they have made their way into the everyday language, proving a remarkable continuity and diffusion within specific cultural realms, they do not represent intangible dimensions of outstanding universal significance.

ICOMOS considers that the nominated property meets criterion (iii), but that criteria (iv) and (vi) have not been demonstrated.

Integrity and authenticity

Integrity

The nomination dossier states that the nominated property includes all the necessary elements and is of adequate size to illustrate its proposed justification for inscription. All attributes and the entirety of the nominated property are covered by designation and statutory protection, and the physical fabric is in good condition and not suffering from neglect or uncontrolled processes of deterioration.

ICOMOS considered that, although the boundaries of the nominated property were largely adequate, some attributes and areas would need to be included within the nominated

property (see boundaries section) to ensure that the requirements for integrity are fully met.

ICOMOS also observes that the long-term conservation programme under implementation is important to ensure that all excavated areas are conserved and protected from erosion, to guarantee their ability to convey the proposed justification for inscription over time.

ICOMOS considers that to safeguard the integrity of the attributes of the nominated property, the protection designation of the nominated area west of the Sakarya River and covering the Lower Town and the Outer Town should be strengthened so that more effective monitoring mechanisms against looting and measures against deep ploughing can be implemented.

The integrity of the landscape surrounding the nominated property, having preserved its rural character, is particularly important for the appreciation and understanding of ancient Gordion, the relationship between the ancient town and the tumuli, and its success as an important urban centre throughout the millennia. Hence, the preservation of this landscape is of utmost importance to support the property's proposed justification for inscription.

With the additional information provided by the State Party that supports the demonstration of criterion (iii) and the enlargement of the boundaries of both the nominated property and the buffer zone, ICOMOS considers that the integrity of the nominated property to justify criterion (iii) has been demonstrated.

Authenticity

The nomination dossier holds that the authenticity of the nominated property is high, thanks to seventy years of archaeological research, which has revealed a wealth of architectural structures of remarkable quality, and finds that complement the information provided by the immovable remains. Careful *in situ* conservation and stabilisation works continue to be implemented on the basis of detailed documentation. The key sources of information for the authenticity of the nominated property rely on the form and design of the excavated structures, their original substance and material, and on the location and setting, which have only limitedly changed over time, with the exception of the forested areas which have been progressively depleted since the Bronze Age.

ICOMOS concurs with the State Party, to a large extent, although it notes that the course of the Sakarya River has changed, due to natural circumstances, and the village of Yassihöyük was established at its current location in the 1920s. The scale and density of the village's built fabric have had no negative impacts on the nominated property, whilst its economy, revolving around agriculture, has contributed to safeguarding the landscape of Gordion. Deep ploughing, however, represents a threat, especially for smaller tumuli. Measures to avoid this impact and, at the

same time, sustain local farmers, would need to be conceived and deployed in coordination.

The conservation methods adopted include both traditional and highly sophisticated contemporary techniques, but all respect the ancient built fabric. Reconstruction is limited to much older interventions.

ICOMOS considers that the authenticity of the nominated property and of its attributes to credibly convey the justification for inscription on the basis of criterion (iii) has been demonstrated.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the nominated property have been met.

Boundaries

There are 54 people living within the nominated property and 160 within the boundaries of the buffer zone.

The boundaries of the nominated property have been determined on the basis of the known extension of the Phrygian settlement and include the central Citadel Mound, the Lower Town, the Outer Town, and seventy-three tumuli out of more than a hundred being inventoried.

The delineation of the boundaries of the buffer zone follows geographical features, transportation infrastructure, and field limits. The buffer zone includes some forty mounds and the surrounding rural landscape, which strongly contributes to the understanding of Gordion ancient settlement.

ICOMOS considers that, although the boundaries of the nominated property are largely adequate, some attributes and areas would benefit from being included within the nominated property, namely Tumulus T67 as well as the areas immediately adjacent to the supposed line of the fortifications, in the north-eastern side of the property.

In its Interim Report, ICOMOS asked for some minor expansion of the boundaries of the nominated property and, accordingly, of the buffer zone.

The State Party replied by proposing enlarged boundaries of the nominated property and of the buffer zone at different points. ICOMOS considers that, in this way, all key attributes of the nominated property are included within its boundaries and the buffer zone encompasses "*important views and other areas or attributes that are functionally important as a support to the nominated property and its protection*".

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that, despite the weaknesses of the comparative analysis, the additional information provided by the State Party that supplements the nomination dossier have proved that Gordion reflects in an exceptional manner, through its tangible attributes, associated archaeological vestiges and *in situ* remains,

and the preserved conditions of its surrounding landscape, the Phrygian civilisation, an advanced Late Bronze and Iron Age culture which developed in Anatolia. The tangible attributes and the comparative analysis support only the justification for criterion (iii), whilst criteria (iv) and (vi) have not been justified: neither the proposed justification, nor the comparative analysis support these criteria. With the expansion of the boundaries of the nominated property and of its buffer zone, all key attributes are now within the nominated property and the buffer zone delineation ensures an adequate layer of protection. The conditions of integrity and authenticity have been met, thanks particularly to the preserved rural character of the surrounding landscape, which significantly contributes to the understanding of Gordion and the appreciation of its value.

4 Conservation measures and monitoring

Documentation

An inventory of all archaeological sites within the nominated property, the buffer zone, and in the wider setting has been carried out and is accessible at the Ankara Regional Council for Conservation of Cultural Properties.

All movable finds are recorded, temporarily kept at the depository in the excavation house, and delivered to the Gordion Museum in Yassıhöyük which is in charge of the objects discovered at Gordion. The Penn Museum has been doing research and archaeological excavations over the last seventy years within the framework of the Gordion Archaeological Project (GAP) and preserves the archives of these investigations. These have been digitised and are accessible to all scholars. As per the Turkish legislation, yearly reports are submitted to Turkey's Ministry of Culture and Tourism and to the Ankara Museum of Anatolian Civilisations.

ICOMOS considers that the documentation of the nominated property is adequate but recommends that a copy of all documentation produced during archaeological excavations be preserved on site, at the Gordion Museum, as well as at the Ankara Museum of Anatolian Civilisations, for safety reasons and to facilitate access to it both for academic and conservation aims.

Conservation measures

After several decades of excavations, since the end of the 19th century, a comprehensive conservation programme has been developed by the Gordion Archaeological Project (GAP), based on risk assessment. The conservation programme integrates academic research, site conservation, and training. It started in 2008, with funds allocated by the Penn Museum and the 1984 Foundation, a Philadelphia-based archaeological foundation, and its implementation continues to this day.

The ordinary maintenance of the site is provided by a local team from the village, who cut the grass and remove bushes as well as monitor the vegetation covering of the ruins.

Tumulus MM, which is the largest and most important among the excavated ones, is continuously monitored and regularly maintained to avoid erosion and overgrowth of vegetation.

ICOMOS considers that the active conservation measures are adequate for the site and should be continued. In this regard, ICOMOS notes that much of the resources to carry out these works are provided by the Penn Museum and other American foundations. Should, for any reason, the commitment of international donors change, the State Party needs to guarantee the necessary resources to continue the conservation programme.

ICOMOS suggests that some conservation measures be put in place for the recently excavated Tumulus 52 and that the prospection holes scattered over the site be refilled to preserve the stratigraphy and avoid any potential accidents. It is further recommended that earth be added on the top of smaller tumuli to make them more visible and therefore less prone to inadvertent damage by ploughing.

Monitoring

A monitoring programme exists and is linked to the management plan objectives and actions. It defines a set of indicators, methods of measurement, periodicity and location of records.

ICOMOS observes that in some cases the timeframe for monitoring would need to be shortened, for example, as in the case of the condition survey, which is currently set at a six-year interval, to ensure that potential issues be detected in good time and do not worsen. Indicators to monitor the effectiveness of planned and implemented anti-looting measures would need to be developed and included in the monitoring programme. Indicators would also need to be further developed and better tied to attributes of the nominated property, to guarantee that monitoring can inform management improvement. Generic periodicity (i.e., 'as appropriate') would need to be better explained. Finally, a clear indication of the body responsible for the monitoring would be needed. For efficiency purposes, it is further suggested that the State Party consider facilitating the integration of the monitoring system with the Periodic Reporting questionnaire.

ICOMOS considers that the documentation and conservation are adequate for the long-term conservation of the nominated property; however, it would be advisable that a copy of the archival documentation preserved at the Penn Museum be also kept in Turkey, at the Gordion Museum and/or the Ankara Museum of Anatolian Civilisations.

The conservation programme for excavated areas is crucial for their integrity; therefore, its implementation should be continued and supported by a reliable flow of resources.

ICOMOS considers that it would be advisable that the monitoring system is further developed to encompass all the attributes of proposed Outstanding Universal Value

and adapted for easy integration of its outcomes into the Periodic Reporting questionnaire. Monitoring indicators of anti-looting actions would also need to be included in the monitoring programme.

5 Protection and management

Legal protection

The nominated property is protected under the Law on the Protection of Cultural and Natural Properties n. 2863/1983 as amended. Part of the nominated property is designated a 1st degree archaeological conservation area, whilst the portion west of the Sakarya River is designated a 3rd degree archaeological conservation area. Three mounds and more than a hundred tumuli have been registered as individual cultural properties through different decisions. Policies for the protection of archaeological heritage are set out in the Regulation n. 658 on Protection and Use Principles of Archaeological Sites.

Protection mechanisms established by the law are complemented by spatial planning documents, their objectives, and provisions. Development in the 3rd degree archaeological conservation area is subject to provisions set out in the Gordion Conservation Development Plan (scale 1:5000) and in the Gordion Conservation Development Implementation Plan (scale 1:1000), which were approved in 2013 by the Ankara Regional Conservation Council for the Protection of Cultural Properties. These plans regulate development in terms of density, height, and function.

Upon ICOMOS's request, the State Party has clarified that the protection of the buffer zone is guaranteed through national, regional, or local plans, as well as through designation as 'agricultural land', subject to provisions of the Soil Protection and Land-Use Law n. 5403/2005. Beyond the buffer zone, District Rural Settlement Development Plans include provisions that strengthen the agricultural character of the wider setting.

In its Interim Report, ICOMOS requested further clarification on the protection mechanisms for the buffer zone and expressed its concerns about the size of the Special Project Area (ÖPA), which is planned to accommodate functions serving tourism purposes rather than the needs of the villagers.

The State Party informed in February 2022 that it agrees to designate Tumulus T67 as a 1st degree archaeological conservation area. On the other hand, the upgrade of the protection designation on the north-western and western limits from a 3rd to a 1st degree archaeological conservation area can begin only when the line of the fortifications between Kuştepe and Küçük Höyük and of the Outer Town has been determined. The State Party on this matter offers an implementation timeframe that sets late December 2022 as the deadline for the approval of the extension of the 1st degree archaeological conservation area based on the results of the archaeological investigation planned for July-August 2022.

The State Party has confirmed that the area west of the nominated property designated under the 3rd degree archaeological conservation regime is not covered by any specific plan. However, safeguarding measures are in place to ensure that development is controlled during the transitional period between the designation and the development of the conservation plan.

Management system

The nomination dossier focuses on the illustration of the management plan rather than on the management system. Hence ICOMOS requested additional information. The State Party clarified that the management system relies on an existing legal and institutional framework. The Ministry of Culture and Tourism and the Ankara Museum of Anatolian Civilisations are key actors for the protection of the nominated property and its movable remains. The municipalities are responsible for regulating spatial development within conservation sites.

The Gordion Archaeological Project (GAP) excavation team from the Penn Museum submits yearly a request to carry out archaeological research and conservation activities and is granted authorisation if the requests meet all necessary requirements set out in the legislation.

Coordination between the excavation team and the Museum Directorate is guaranteed by an inspector, the representative of the Ministry of Culture and Tourism during the excavation season.

The legal framework in Turkey (Regulation on the Rules and Procedures of the Establishment and Duties of the Site Management and the Monument Council and Identification of Management Sites) provides for the establishment of management areas, for which coordination in planning and conservation is ensured among relevant actors and defined through a wide consultation process. Hence the management plan of the nominated property provides a framework for management and coordination mechanisms. As per the above-mentioned Regulation, a site manager was appointed in 2019, tasked with the coordination, programming, and implementation of management activities.

A Management Plan Coordination and Audit Board and an Advisory Board for the management of the nominated property were established in June 2020.

The Management Plan for the nominated property for the period 2021-2025 was approved by the Coordination and Audit Board in 2021. The plan sets out the objectives and actions needed to ensure the protection of the property and its sustainable use. It also defines the responsibilities of the relevant managing bodies in implementing its actions.

ICOMOS observes that a large role is played by the Penn Museum, with its significant financial investment in the research and conservation of the nominated property. Although the engagement of the Penn Museum and the collaboration between this institution and the Turkish authorities has been continuous over the last seventy

years, this international cooperation is subject to annual authorisations, according to the Turkish legal framework on archaeological concessions.

ICOMOS, therefore, asked confirmation in its Interim Report from the State Party that if for any reason the cooperation with the Penn Museum and its international partners were to cease, the State Party will deploy all necessary instrumental, financial and human resources to continue the study and conservation of the nominated property in the long-term.

The State Party confirmed that the cooperation with Penn Museum is based on the yearly renewal of permission, as per the national regulations on the matter. This is a quality control mechanism for the State Party to ensure that legislation and international good practice are respected. Therefore, as long as expected standards are respected, research permissions are renewed. In any case, the General Directorate of Cultural Properties and Museums is fully committed to sustaining the management of the nominated property with adequate resources.

ICOMOS further notes that some of the actions envisaged in the management plan would need to be given higher priority, such as those related to Land-Use and Spatial Planning (i.e., actions 13.3, 14.2, and 14.3), as a response to local needs and aspirations, in line with the long-term preservation of the nominated property and its setting.

Risk management is addressed through coordinated activities included in the action plan of the management plan, which also envisages the preparation of an emergency plan.

Visitor management

The nomination dossier explains that strategies at the national and regional scales exist and include Gordion within a larger network of tourist destinations linked by common themes. Local spatial plans include provisions for the development of facilities and services that can serve both locals and tourists.

ICOMOS observes that developing infrastructure to support an increase in tourism at the nominated property needs to respect the built character and the socio-economic profile of Yassihöyük as well as the needs of local inhabitants. In this regard, the guidelines for rehabilitating traditional buildings in the village and for in-fill constructions envisaged in the management plan would be very useful tools to guide development. ICOMOS also reminds of the provisions of paragraph 172 of the *Operational Guidelines for the Implementation of the World Heritage Convention* which invites the State Party to notify the World Heritage Committee about any development projects planned to be undertaken in the area of the nominated property.

ICOMOS recommended as an urgent action the preparation of a visitor management plan for Tumulus MM. The State Party explained that measures are in place to control visitor numbers at this site and the duration of the visits is limited in number and time. The wooden chamber

is not accessible, and is subject to permanent monitoring of the indoor environmental parameters.

Community involvement

The additional information provided by the State Party in November 2021 clarifies that local communities have been involved in the project through the research and excavation and this has contributed to the long-term conservation of the nominated property. Local authorities and village representatives have been involved in the preparation of the management plan. Local communities are also represented in the Advisory and Coordination and Audit Boards. Specific actions in the management plan promote the participation of local communities in the management of the nominated property.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the legal protection of the nominated property can be considered acceptable but could be strengthened by upgrading the designation of the entire nominated property from a 3rd to a 1st degree archaeological conservation regime and by preparing a conservation plan covering the entirety of the nominated property. In this regard, the decision to designate the area of Tumulus T67 as a 1st degree archaeological conservation area and the calendar presented by the State Party to approve this upgrading at the west and north-west of the nominated property by the end of 2022 is welcomed and supported by ICOMOS. This upgrading will have to be accompanied as a priority by strengthened anti-looting measures and mechanisms that combine measures to avoid deep-ploughing in archaeologically sensitive land and support/compensations to negatively impacted farmers. The protection in place for the buffer zone relies on large-scale planning instruments and legislation; although acceptable, it would benefit from additional mechanisms to guarantee that the rural character and agricultural use will be continued and to prevent looting. The additional clarification about the respective role of international research institutions and of the State Party confirms that the management system is adequate. A management plan has been approved and it forms a good basis for managing the nominated property and its buffer zone, although some reorganisation of outlined priorities may be beneficial. Current measures for managing visitors at Tumulus MM represent a good point of departure; however, ICOMOS stresses the need for visitor management for Gordion and the Tumulus is necessary, in view of increased numbers of visitors.

6 Conclusion

Located in Central Anatolia, Gordion is a multi-layered ancient settlement that has been nominated because it bears exceptional testimony to Phrygian culture, an Iron Age independent kingdom that emerged after the fall of the Hittites. The nominated property comprises the archaeological remains of the Citadel Mound, the Lower Town, the Outer Town and Fortifications, and several burial mounds and tumuli with their surrounding landscape. Several decades of archaeological excavations and research have revealed a wealth of remains that attest to the Phrygians' construction and craftsmanship achievements, most of which are preserved *in situ* or have been rigorously documented. Despite some shortcomings in the comparative analysis, ICOMOS has found that Gordion bears exceptional witness, through its tangible attributes, associated archaeological vestiges and *in situ* remains, and the preserved condition of its surrounding landscape, of the Phrygian civilisation. Gordion has demonstrated that it fulfils criterion (iii) but not criteria (iv) and (vi), as neither the wording of the justification of these criteria nor the comparative analysis supports them. Some issues concerning the delineation of the boundaries have been resolved through the evaluation process and now the boundaries of both the nominated property and of its buffer zone are fully satisfactory.

The State Party is to be commended for the efforts deployed to nominate the entirety of ancient Gordion and to define an adequate area as a buffer zone for the protection of Gordion's landscape, which includes *"important views and other areas or attributes that are functionally important as a support to the property and its protection"*.

The preservation of the expansive, rural character of the landscape surrounding Gordion is critical to the integrity and authenticity of the nominated property and to allow the understanding and appreciation of its Outstanding Universal Value. To this aim, current protection mechanisms need to be consistently implemented and strengthened through adequate planning and land-use provisions aimed at preserving both the rural character and the archaeological remains in the landscape. In the light of the above, the scale of some development proposals for Yassihöyük would need to be reconsidered, and mechanisms to support farmers negatively impacted by protection measures for buried archaeology would need to be set out as a priority.

A long-term conservation programme of the excavated remains has been elaborated: its implementation has begun and its continuation is crucial.

Looting represents a concern in the outer parts of the nominated property and in the buffer zone. Upgrading the designation for the entirety of the nominated property to the highest level would strengthen protection mechanisms: the State Party has proposed a timeframe for this upgrading which seems viable.

A management system is in place and a management plan has been approved, forming a good basis for the management of the property, although some actions may need to be given higher priority, e.g., mechanisms to support farmers and the restoration of old traditional houses in the village.

In conclusion, ICOMOS considers that the nominated property can be recommended for inscription; ancillary proposed recommendations would need to be carefully implemented and regularly reported.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that Gordion, Turkey, be inscribed on the World Heritage List on the basis of **criterion (iii)**.

Recommended Statement of Outstanding Universal Value

Brief synthesis

The archaeological site of Gordion ranks as one of the most important historical centres in the ancient Near East. Gordion lies approximately ninety kilometres south-west of Ankara in central Turkey, at the intersection of the great empires to the east (Assyrians, Babylonians, Hittites) and the west (Greeks, Romans). Consequently, it occupied a strategic position on nearly all trade routes that linked the Aegean and Mediterranean seas with the Near East. Gordion is an outstanding archaeological site for understanding the Phrygian civilisation and its achievements. The buildings of its Early Phrygian citadel, and the burial mounds of the city's rulers, constitute the exceptional exemplars of monumental architecture in the Iron Age Near East.

The entrance to the Phrygian citadel features the best-preserved Iron Age (10th-8th centuries BCE) fortified gate complex that has yet been discovered, with stone masonry still preserved to a height of ten metres. The elite buildings within the citadel feature the earliest known coloured floor mosaics. The citadel's industrial quarter, or Terrace Complex, was dedicated to large-scale food preparation and the production of textiles. With a length of over a hundred metres, the complex is without parallel in the ancient world. The roofing systems of the citadel's buildings featured timber beams over ten metres in length with no internal supports, which is a daring, unparalleled feat of engineering for the period. The large concentration of monumental tumuli in the vicinity of Gordion creates an exceptional landscape of power, different from any other site in the Near East. The largest of the tumuli, the "Midas Mound" (Tumulus MM), rises to a height of fifty-three metres and the burial chamber within is the oldest known standing wooden building in the world (ca. 740 BCE), and inside it was found the best-preserved wooden furniture known from antiquity.

Criterion (iii): Gordion was the political and cultural centre of ancient Phrygia and today it represents the best surviving testimony to Phrygian civilisation, an Iron Age civilisation which developed in Anatolia and excelled in timber construction, woodcarving and metalwork.

Integrity

The property fully includes all the attributes that reflect its Outstanding Universal Value and is large enough for the context of these to be properly appreciated and understood. A long-term conservation programme under implementation ensures that an appropriate state of conservation is progressively achieved for all excavated areas. The tumuli and the unexcavated areas are overall in good condition, although smaller tumuli suffer from the effects of deep-ploughing. Measures are being envisaged to prevent their further erosion.

Authenticity

The level of authenticity of all attributes of the property is high. Seventy years of excavation and research have revealed a remarkable quality, quantity, and variety of archaeological remains, with high levels of preservation. There has been *in situ* consolidation work on parts of the structures on the Citadel Mound. The substantial amount of data recovered from the archaeological excavations has ensured that the archaeological remains subject to stabilisation/consolidation work retain a high level of authenticity in terms of material and design. All stabilisation work has been based on complete and detailed documentation.

Management and protection requirements

The property has the highest level of site designation, having been designated as a 1st and 3rd degree archaeological conservation area by the Decision No.1096, 16/02/1990 of the Ankara Regional Council for Conservation of Cultural and Natural Properties. In addition, the status of 3rd degree archaeological conservation area designation ensures that the immediate setting of the Citadel Mound at the west and north peripheries is protected from adverse development. This is also protected and managed within the framework of the Protection of Cultural and Natural Properties Law (*Kültür ve Tabiat Varlıklarını Koruma Kanunu*) No. 2863, 23/07/1983 as amended by the Law No. 5226, 14/07/2004.

The buffer zone is protected through national, regional, or local plans and through its designation as agricultural land, subject to provisions of the Soil Protection and Land-Use Law n. 5403/2005. The wider setting is covered by District Rural Settlement Development Plans. A management system and mechanisms are in place and include a management plan: its implementation through a participative approach towards the local community will guarantee its effectiveness.

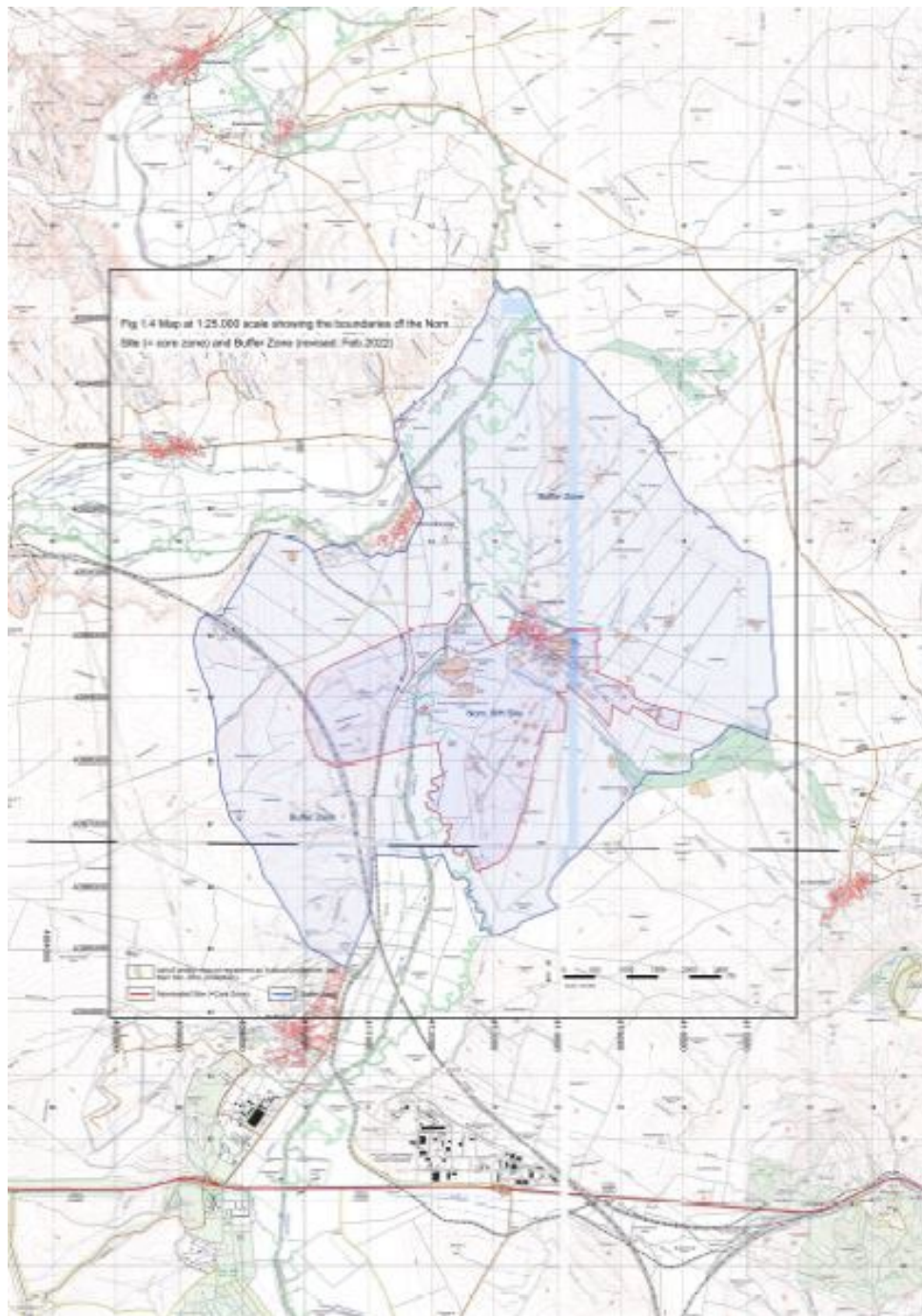
Proactive measures to prevent looting and mechanisms to support the farming community vis-à-vis the necessary restrictions to preserve buried archaeological deposits are

key for the long-term sustenance of the integrity and authenticity of the attributes of Gordion's Outstanding Universal Value, as is the preservation of the rural character of its immediate and wider setting.

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Relocating the planned new museum outside the property's boundaries,
- b) Considering a reduction of the currently permissible development in the village of Yassihöyük, particularly of the Special Project Area (ÖPA),
- c) Implementing the proposed programme for upgrading the protection of all areas of the property from a 3rd degree to a 1st degree archaeological conservation area, according to the timeframe set out in the February 2022 additional information,
- d) Preparing a conservation plan for all designated archaeological areas within the property and the buffer zone that are not currently covered by such a plan,
- e) Ensuring regular patrolling in all areas included in the boundaries of the property and developing measures to prevent looting,
- f) Developing strategies and mechanisms to support the farmers that may be affected by restrictions on agricultural activities to preserve underground archaeological remains,
- g) Preparing a visitor management strategy for Gordion, with a particular focus on Tumulus MM, based on the outcomes of indoor parameters' monitoring and modelling, to ensure that a potential increase of visitors does not negatively affect the Iron Age wooden chamber,
- h) Submitting to the World Heritage Centre and ICOMOS by 1 December 2024, a report on the implementation of the recommendations set out above;



Revised map showing the boundaries of the nominated property (February 2022)