

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

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Charenton-le-Pont, 15 July 2024

H. E. Mr Mounir Anastas
Ambassador, Permanent Delegate
Permanent Delegation of the State of Palestine
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World Heritage List 2024 – Additional Information Saint Hilarion Monastery/Tell Umm Amer (Palestine)

Dear Ambassador,

Following the transmission by the World Heritage Centre to ICOMOS, on 24 June 2024, of your request for the nomination as a World Heritage property of “**Saint Hilarion Monastery/Tell Umm Amer**” to be evaluated under the emergency procedure, as set out in paragraphs 161 and 162 of the *Operational Guidelines for the Implementation of the World Heritage Convention*, and in order to facilitate our evaluation procedure, we would like to request additional information on the following points:

Justification for inscription

The State Party has justified the proposed Outstanding Universal Value of the nominated property as follows:

- One of the earliest and most significant monastic sites in the Middle East;
- The role of the site in the distribution and development of Christian monasticism across the region justifies the proposed Outstanding Universal Value;
- Exceptional architectural and archaeological attributes provide unparalleled insights into the development and practices of early Christian monasticism, offering a clear evolution from solitary asceticism to communal religious life;
- The profound influence of the Monastery on Christian monasticism across the Eastern Mediterranean underscores its unique significance, shaping religious practices and spiritual life in the region;
- The architectural innovations and artistic contributions, particularly in mosaic art, underscore the exceptional value of the site;
- The nominated property is an outstanding example of the evolution of ecclesiastical architecture and construction techniques;
- The layout of the Monastery demonstrates innovative planning;
- The architectural ingenuity of the Saint Hilarion Monastery influenced the development of monastic architecture throughout the Middle East, setting a precedent for future religious complexes in the region.

ICOMOS would be grateful if the State Party could further elaborate on the following points:

- (1) Please describe the influence of the Saint Hilarion Monastery on the development of Christian monasticism across the Eastern Mediterranean and the Middle East – what did it consist of in terms of theological/monastic traditions, communal living, or religious practice? Please provide concrete examples, if possible.
- (2) In what sense can the architectural layout of the Monastery be considered innovative, and what specifically does the State Party mean when speaking about architectural innovations and artistic contributions that could be considered exceptional in the structure or design of the monastic complex?
- (3) Could the State Party please provide examples of monastic architecture in the Middle East that can be said to have been directly influenced by the example of the Saint Hilarion Monastery?

Attributes

The nomination dossier (p. 32-35) describes the architectural features that are said to constitute the attributes of the nominated property. From this description, as juxtaposed with the provided pictures, it is difficult to establish what really is preserved on the ground and ground and what has been presented in literature as a reconstruction based on the excavations that have been completed on the site, and especially given that the complex has undergone many phases of rebuilding in the past.

ICOMOS notes that the site was used as a quarry for building materials for centuries after it had been abandoned. As such, “[t]he remains are mostly close to ground level. Thus, the Site’s outline has been erased from landscape views, and the Site can no longer be perceived at a distance” (Conservation and Management Plan, p. 44).

Could the State Party please clarify to which phase of the expansion of the complex the outline of the monastic complex that is seen today reflects? Does it include only the latest stage (as indicated in the Table on p. 36-39 of the nomination dossier)? Or is it a mixture of different phases of construction and rebuilding of the complex, reflecting the architectural evolution of the place?

Boundaries and a buffer zone

According to the nomination dossier the master plan of the Nuseirat Municipality “focuses on protecting the site itself, ensuring unobstructed views of its surroundings, and establishing a necessary buffer zone” (p. 82). The land immediately surrounding the nominated property to the east, west and south (within the proposed buffer zone) is designated for residential use, while to the north it is for agricultural purposes (p. 82 of the nomination dossier, and p. 37 of the Conservation and Management Plan). The nomination dossier acknowledges that the master plan lacks specific building regulations and restrictions necessary to create an adequate buffer zone, which has a detrimental impact on the archaeological site.

On the other hand, the already endorsed Conservation and Management Plan states that “[n]either the Site nor the current endorsed master plan includes a buffer zone surrounding the Site. Establishing buffer zones around the Site within the zoning plan is needed” (p. 80 and 88). The Conservation and Management Plan suggests that the enhanced protection of the site through the creation of a buffer zone requires adjusting the master plan (p. 88). Two scenarios are proposed – both include adjustments to the roads around the nominated property, regulating building and urban development around the site (change of land-use designation from Residential B to tourist use) and expropriating adjacent land

parcels. They also involve expanding what is described as the “existing boundary of the heritage site” as shown on maps 16 and 17 in the Conservation and Management Plan (p. 90-91). The Conservation and Management Plan lists a number of actions that would need to be taken in both scenarios to regulate the buffer zone. This includes government decision on land expropriation and compensation, a cabinet decision to freeze the Nuseirat–Tell Umm Amer Zoning Plan of October 2018, a new Physical Zoning Plan, etc. (p. 91).

At the same time, it is stated in the nomination dossier that “[t]he Nuseirat Municipality sees itself as a representative of the local community, particularly the residents who own land parcels surrounding the site. The municipality is resistant to altering the width of surrounding streets and building regulations in the site's buffer zone” (p. 82).

The boundaries of the nominated property and of the buffer zone presented in the nomination dossier (figure 1.4, on p. 25) do not seem to match either of the two scenarios presented in the Conservation and Management Plan. The proposed boundary of the nominated property does not seem to match the “existing boundary of the heritage site” either (as per maps 16 and 17 of the Conservation and Management Plan).

In light thereof, ICOMOS would be grateful if the State Party could confirm:

- (1) the boundaries of the nominated property and the buffer zone that are applicable;
- (2) whether both of these boundaries have been approved by the relevant authorities or whether they are still at the planning stage;
- (3) how does the State Party plan to reconcile in the future the different expectations of the stakeholders, seeing that the proposed boundaries of the nominated property and the buffer zone are not currently aligned with the existing master plan and current land uses?
- (4) what kind of arrangements have been made at this stage with the private owners of the plots which fall within the proposed buffer zone?

Legal protection

According to the nomination dossier, the nominated property is fully protected by the Decree Law of Tangible Cultural Heritage (no. 11, 2018). This law repeals the 1966 Jordanian Law of Antiquities and the 1929 British Law of Antiquities as well as all other provisions that contradict it (p. 80).

In the Conservation and Management Plan, the State Party has stated that “[i]n 1994, the Palestinian Authority decided to utilize the Palestinian Antiquities Law of 1929, which has remained in effect to this day in the Gaza Strip. Meanwhile, the Ministry of Tourism and Antiquities in Ramallah follows the Palestinian Tangible Cultural Heritage Law No. 11, which was adopted in 2018 (Decree Law No. 11/2018)” (p. 72).

Could the State Party please clarify whether the 1929 Antiquities Law is still in force in terms of the legal protection of the nominated property or whether it has been replaced by the Decree Law of Tangible Cultural Heritage (no. 11, 2018)?

We would be grateful if you could provide **ICOMOS** and the **UNESCO World Heritage Centre** with the above information by **Monday 19 August 2024 at the latest**.

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

Please note that the State Party shall submit a copy of the additional information to the UNESCO World Heritage Centre and a copy to ICOMOS so that it can be formally registered as part of the nomination dossier.

We thank you in advance for your kind cooperation.

Yours faithfully,



Gwenaëlle Bourdin
Director
ICOMOS Evaluation Unit

Copy to The World Heritage General Directorate
 Ministry of Tourism and Antiquities
 UNESCO World Heritage Centre

State of Palestine
Ministry of Tourism and Antiquities
World Heritage General Directorate

**Response of the State of Palestine to the ICOMOS Additional Information
Request**
Saint Hilarion/ Tell Umm Amer (Palestine)



July 2024

Justification for inscription

Réponse aux questions posées par ICOMOS.

- 1) Veuillez décrire l'influence du monastère Saint-Hilarion sur le développement du monachisme chrétien à travers la Méditerranée orientale et le Moyen-Orient – en quoi consistait-il en termes de traditions théologiques/monastiques, de vie communautaire ou de pratique religieuse ? Veuillez fournir des exemples concrets, si possible.*

Né à Thauatha dans le Sud de la ville de Gaza, Hilarion est considéré comme étant le précurseur du monachisme en Palestine et en Terre Sainte.

Lorsqu'Hilarion s'installe sur le site appelé aujourd'hui Tell Umm Amer dans le premier quart du IV^{ème} siècle, il est le premier à développer la vie en communauté en Palestine et en Terre Sainte. Jusqu'à cette période les religieux, les personnes considérés comme saintes vivent dans l'ascétisme en tant qu'ermite, dans une cabane, une grotte isolée du monde etc... Architecturalement, l'archéologie a révélé et attesté sur cette communauté. Le premier bâtiment construit au courant de la première moitié du IV^{ème} siècle sur le site appelé *Cenobium* (ou *Koinobion en grec*) en est la preuve architecturale, il perdurera jusqu'à l'exile d'Hilarion en 361. Le même type d'installations est mis en œuvre à la même époque en Egypte dans le *Wadi Natrun* au lieu dit « *les Kellias* ». Le fondateur de cet ensemble architectural égyptien est d'ailleurs comme Hilarion un disciple d'Antoine.

A la même période, Chariton développe des monastères dans le désert de Cisjordanie cependant ces installations ne présenteront pas le développement et les transformations du site de Tell Umm Amer. Et ne seront pas des centres de rayonnement du christianisme ils resteront retirés, isolé avec des règles ascétiques strictes.

A partir du retour des reliques d'Hilarion, le monastère de Tell Umm Amer sera, dans les décennies qui suivent, transformé avec l'installation d'une première église construite sur sa cellule devenu caveau reliquaire. Trois églises vont se succéder au cours de cinq phases d'évolution preuves de sa continuité et de l'importance du lieu.

Dans la première moitié du VI^{ème} siècle, le christianisme est, à son apogée, à Gaza. Le monastère participe à sa diffusion et est également un centre théologique, spirituel et lieu de formation pour de nouveaux moines et prônant les règles du semi- anachorétisme comme le prouvent les textes liés la correspondance de Barsanuphe et de Jean de Gaza. Séridos alors maître abbé des lieux applique les règles du concile de Chalcédoine et la législation religieuse et impériale alors en vigueur. Ces règles auront une importante influence sur l'architecture du monastère. Il est alors clos d'une enceinte en pierre, une hôtellerie y est édifiée ainsi qu'une nouvelle église et il est probable que la grande crypte, le complexe baptismal y compris sa chapelle et le bain fassent partie de cet important programme. Cependant, même à cette période la mémoire d'Hilarion dans le lieu a perduré. Elle a perduré dans les tracés qui définissent l'organisation architecturale et spatiale du sanctuaire. Le centre de tous les tracés régulateurs est le caveaux reliquaire d'Hilarion le centre du sanctuaire.

2) Dans quel sens l'aménagement architectural du monastère peut-il être considéré comme innovant, et que veut spécifiquement dire l'État partie lorsqu'il parle d'innovations architecturales et de contributions artistiques qui pourraient être considérées comme exceptionnelles dans la structure ou la conception du complexe monastique ?

Le caractère exceptionnel du monastère de Saint Hilarion réside dans la continuité architecturale qui lui est propre. L'archéologie a démontré cette évolution en continu du monument entre le début du IV^{ème} siècle et le courant du VIII^{ème} siècle. Cette évolution en continu est exceptionnelle pour la région et une grande partie de la méditerranée orientale, aucun monastère fouillé en Terre Sainte n'a pour le moment révélé de telles informations. L'originalité architecturale réside

dans cette continuité architecturale dans ce lieu précis. L'archéologie a montré comment constructeurs, ingénieurs ou architectes ont adapté le monument en fonction des mouvements de la dune sur laquelle il est construit et cela depuis le IV^{ème} siècle. Il s'agit là d'un bel exemple d'adaptation d'un monument à son milieu naturel. La construction de la grande crypte au VI^{ème} siècle va dans ce sens. Situé en bordure de la dune, le chœur du monastère devait être stabilisé, la poussée des colonnades, hautes, lourdes et puissantes, sur les stylobates devait être contenue. Seule une puissante structure à l'Est sous le chœur pouvait les contenir et reprendre les charges des structures situées au-dessus. La conception structurelle de la grande crypte a eu cette fonction. L'association de murs épais et puissants à des voûtes et croisée de voûtes en berceau l'a permis. Le chœur a été construit sur ce socle. Cette configuration est unique pour tout le monde Proche oriental.

L'autre élément remarquable réside dans la définition des proportions de l'édifice tardif. Les architectes qui ont dessiné le monastère dans sa version tardive VI^{ème} siècle ont utilisé un système de proportions et de tracés régulateurs pour l'ensemble de la gestion géométrique du plan et des dimensions du monument. Cette organisation touche toutes les parties de l'ensemble ecclésiastique (église, atrium, baptistères, chapelle, crypte).

(3) L'État partie pourrait-il fournir des exemples d'architecture monastique au Moyen-Orient dont on peut dire qu'elle a été directement influencée par l'exemple du monastère Saint-Hilarion?

Le monastère est à la croisée entre les influences égyptiennes du désert et celles du monde hellénistique méditerranéen. Fortement influencé par l'Égypte dans son organisation primitive, il le sera dans ses versions tardives par le monde hellénistique. Il a vraisemblablement servi d'exemple pour les monastères du désert du Nègeb, l'arrière-pays de Gaza cependant un bon nombre de ces lieux non pas révélés de chronologie et d'évolution comparables à celle de Saint Hilarion ou n'ont pas été complètement fouillés. Il est probable que ce soit plutôt la pratique du semi- anachorétisme (certains moines de la communauté, « les meilleurs », vivent comme des ermites au sein de la communauté) qui soit l'élément qui ait influencé

les autres communautés. Les communautés s'organiseront suivant ce principe qui impliquera l'organisation des autres monastères. Ce sont les moines qui transmettront ces changements d'un lieu à un autre. Comme par exemple, les monastères de Saint Saba, Chariton et Euthyme dans le désert de Cisjordanie à la périphérie de Bethlehem et dans le désert du Negeb.

Les attributs

L'État partie pourrait-il préciser à quelle phase de l'expansion du complexe reflète la silhouette du complexe monastique que l'on voit aujourd'hui ? Inclut-elle uniquement la dernière étape (comme indiqué dans le tableau p. 36-39 du dossier de proposition d'inscription) ? Ou s'agit-il d'un mélange de différentes phases de construction et de reconstruction du complexe, reflétant l'évolution architecturale du lieu?

L'état le plus tardif est le plus important par la taille et le plus lisible actuellement. Les vestiges s'étendent sur plus de 14 000 m². Pour des raisons de conservation, de préservation et en raison de leur fragilité et de leur importance les vestiges les plus anciens du monastère ont été enfouis. Ils se concentrent dans la zone de l'ensemble ecclésiastique dans et autour du sanctuaire. Les vestiges du *Cenobium* primitif, datant de la première moitié du IV^{ème} siècle, réalisés en brique de terre crue, ont été protégés, conservés sous 0,50m et 0,60 m d'épaisseur. Il en est de même pour les autres états plus anciens des églises et du monastère.

Les vestiges visibles sur les documents sont contemporains et postérieurs VI^{ème} siècle. Tous les autres vestiges, les plus anciens, sont actuellement enfouis, protéger.

Diverses publications présentent les états les plus anciens essentiellement dans l'aire des églises (sanctuaire). D'autres documents, liées aux différentes interventions archéologiques et présentant les différents vestiges mis au jour et aujourd'hui ré-enfouis, sont en cours de réalisation ils seront disponibles à la fin de la longue analyse de la documentation archéologique actuellement en cours de traitement.

Boundaries of the Nominated Property and Buffer Zone

Response to ICOMOS Questions: ICOMOS would be grateful if the State Party could confirm:

1- The boundaries of the nominated property and the buffer zone that are applicable.

The boundaries of the nominated property for Saint Hilarion Monastery/Tell Umm Amer are precisely delineated in the Nomination File (Figures 1.4 and 1.5, pp. 24-25), encompassing an area of approximately 1.33 hectares. These boundaries, marked within the existing fenced perimeter of the archaeological park, include all attributes of Outstanding Universal Value (OUV), thereby ensuring the protection of both the site's OUV and its associated attributes. The designated area is sufficiently large to comprehensively represent the OUV of the property and its conveying attributes. Within these boundaries, all OUV attributes are thoroughly preserved, including the two distinct architectural complexes: the ecclesiastical section to the south (approximately 4,650 m²) and the thermal baths and hotel to the north (about 3,650 m²). This comprehensive delineation ensures the site's authenticity and integrity are maintained.

The nominated property is surrounded by a buffer zone of approximately 7.32 hectares, carefully designed to accommodate potential significant archaeological discoveries and to maintain the site's authenticity and integrity. This buffer zone serves as a protective measure against adverse impacts from surrounding activities such as urban development and infrastructure projects. Its dimensions are intended to prevent urban encroachment and safeguard the site's visual and environmental integrity. The integration of the buffer zone into local urban planning frameworks is essential for its effectiveness, with this process scheduled to commence after the ceasefire in the Gaza Strip.

The total area of the nominated property, including the buffer zone, amounts to 8.652 hectares. This configuration aims to ensure comprehensive protection and management of the site's OUV. The buffer zone has been designed as a manageable perimeter surrounding the nominated property to mitigate potential threats from development and encroachment.

2- Whether both of these boundaries have been approved by the relevant authorities or whether they are still at the planning stage.

The boundaries of the nominated property have been clearly defined and maintained within the existing fenced perimeter, ensuring that all attributes of Outstanding Universal Value (OUV) are encompassed and protected. This thorough delineation underscores the commitment to preserving the site's integrity and authenticity, including the two distinct architectural complexes: the ecclesiastical section to the south and the thermal baths and hotel to the north.

The nominated property is situated in the transitional area between An-Nuseirat to the north and Az-Zawayda to the south. The region is characterized by a grid-like urban layout with long and relatively wide streets ranging from 10 to 25 meters in width. The area's master plan, approved by the An-Nuseirat Municipality in 2018 and endorsed by the Ministry of Local Government, specifies that most streets are open, though many remain unpaved. However, the pressure on land resources, the presence of private land ownership, and a lack of financial resources or effective compensation mechanisms present significant challenges to the establishment of a wider buffer zone.

The buffer zone, as delineated in the Nomination File, has been designed as a rational zone surrounding the nominated property, ensuring it is manageable and capable of protecting the property from development and urban encroachment. However, the two scenarios for the buffer zone presented in the Conservation and Management Plan (CMP) remain preliminary suggestions. These have not yet received formal endorsement due to the ongoing war in the Gaza Strip, which has severely impacted the ability to finalize and ratify the plan. The proposals within the CMP have not been thoroughly discussed with or approved by the relevant stakeholders, including the An-Nuseirat Municipality, which plays a crucial role in the successful delineation and implementation of the buffer zone. The support and cooperation of the municipality are essential for any regulatory adjustments and integration with local urban planning frameworks.

The State of Palestine recognizes the importance of securing stakeholders' engagement and approval and is committed to fostering an inclusive and collaborative approach. When the ongoing war will stop, and as soon as the situation allows, required legislative measures will be taken to amend the Master Plan of An-



Nuseirat Municipality to formally include and endorse the boundaries of the nominated property and its buffer zone. This process will ensure that the buffer zone is effectively integrated into the local planning framework, providing necessary protection and management measures to uphold the site's significance.

In summary, while the boundaries of the nominated property are clearly defined and maintained, the Conservation and Management Plan (CMP) remains a preliminary document due to the ongoing conflict in the Gaza Strip. The buffer zone proposals outlined in the draft CMP have not yet received formal endorsement or approval from relevant stakeholders. Achieving a comprehensive and sustainable solution will require further dialogue and collaboration to balance heritage conservation with the socio-economic conditions of the local community.

Once the ongoing war ceases and the situation permits, the State of Palestine will undertake legislative measures to amend the Master Plan of An-Nuseirat Municipality. This amendment will formally incorporate and endorse the boundaries of the nominated property and its buffer zone, ensuring their effective integration into the local planning framework and providing the necessary protection and management for the site.

3. Expectations How does the State Party plan to reconcile in the future the different expectations of the stakeholders, seeing that the proposed boundaries of the nominated property and the buffer zone are not currently aligned with the existing master plan and current land uses?

The State of Palestine acknowledges the challenges posed by the misalignment of the proposed boundaries with the existing master plan and current land uses. To address these challenges, and upon the ceasefire and when the situation in the Gaza Strip allows, the State Party is fully committed to undertaking a collaborative and inclusive approach. This involves engaging in extensive consultations with all relevant stakeholders, including local authorities, community representatives, and private landowners. The aim is to effectively integrate the buffer zone within the urban physical spatial plan of An-Nuseirat Municipality.

The State of Palestine is dedicated to ensuring that the buffer zone provides adequate protection for the site while also accommodating the needs and expectations of the local community. To achieve this, the State Party will organize a series of meetings and workshops with stakeholders to discuss the proposed boundaries and gather



input on potential impacts and solutions. Close coordination with the An-Nuseirat Municipality will be prioritized to align the buffer zone with local development plans.

Efforts will be made to propose and implement necessary regulatory adjustments to the Urban Master Plan. This involves reviewing zoning laws and urban development guidelines to ensure they support the protection of the nominated property while allowing for sustainable community growth. The State Party is committed to exploring sustainable solutions for urban development around the nominated World Heritage property.

4. What kind of arrangements have been made at this stage with the private owners of the plots which fall within the proposed buffer zone?

At this stage, no formal arrangements have been made with private owners of plots within the proposed buffer zone, although several generic consultations took place in the framework of the preparation of the CMP. The current situation in the Gaza Strip poses significant challenges to conducting any such arrangements. However, once the ceasefire is in place and the situation allows, the State of Palestine plans to engage with the An-Nuseirat Municipality and private landowners through dialogue and negotiation to explore possible solutions and modifications to the Urban Master Plan. In the meantime, all necessary modifications will be part of the Desired State of Conservation for the removal of the property from the World Heritage List in Danger (DSOC) and its corrective measures. The State Party will ensure that these negotiations are conducted transparently and fairly, with the goal of achieving a mutually beneficial outcome that upholds the integrity of the nominated property while respecting the rights and interests of private landowners.

In conclusion, the State Party confirms the boundaries of the nominated property as encompassing 1.33 hectares and the buffer zone as approximately 7.32 hectares. These boundaries are clearly delineated, with the buffer zone designed to protect the property from urban encroachment and development pressures. The ongoing conflict in Gaza Strip has delayed the formal endorsement and finalization of the CMP, but the State Party is committed to engaging stakeholders in a collaborative process to finalize the CMP and ensure the successful integration of the buffer zone within local urban planning frameworks. This will involve extensive consultations with local authorities, community representatives, and private landowners, with a focus on



achieving a balanced and sustainable approach to heritage conservation and urban development.

Protection and Management Requirements

Could the State Party please clarify whether the 1929 Antiquities Law is still in force in terms of the legal protection of the nominated property or whether it has been replaced by the Decree Law of Tangible Cultural Heritage (no. 11, 2018)?

The State of Palestine confirms that the nominated property, Saint Hilarion Monastery/Tell Umm Amer, is governed by the Decree Law of Tangible Cultural Heritage, issued in 2018. This law has effectively replaced the 1929 British Mandate Antiquities Law in the Gaza Strip and the 1966 Jordanian Antiquities Law in the West Bank (Article 78). The 2018 Decree Law significantly broadens the scope of heritage management and protection, unifying the legal framework for safeguarding tangible cultural heritage across Palestine.

Following the establishment of the Palestinian National Authority in 1994, a Presidential Decree reinstated all laws that existed prior to June 4, 1967, before the Israeli occupation of the Palestinian Territories. This reinstatement included the 1966 Jordanian Antiquities Law in the West Bank and the 1929 British Mandate Antiquities Law in the Gaza Strip, which initially provided the legal framework for heritage protection in their respective regions.

In 2018, the Decree Law concerning Tangible Cultural Heritage in Palestine was enacted and endorsed, significantly enhancing the scope and effectiveness of heritage management and protection. This law represents a major achievement in the field of cultural heritage in Palestine, providing comprehensive legal protection aligned with international standards. It complies with various international conventions ratified by the State of Palestine, including the Convention Concerning the Protection of the World Cultural and Natural Heritage (1972), the Hague Convention for the Protection of Cultural Property in the Event of Armed Conflict (1954) and its two protocols, the Convention on the Means of Prohibiting and Preventing the Illicit Import, Export, and Transfer of Ownership of Cultural Property (1970), and the Convention on the Protection of the Underwater Cultural Heritage (2001).



The reference to the 1929 Palestinian Antiquities Law within the preliminary Conservation and Management Plan for the Gaza Strip is related to the 1994 decision taken by the Palestinian Authority. It is important to note that the Conservation and Management Plan remains in draft form and has not yet received formal endorsement. As a preliminary document, it includes provisional information that requires further refinement. The preparation of the Conservation and Management Plan began last summer but has faced significant delays due to the ongoing conflict, which has disrupted and hindered progress.

In conclusion, the State of Palestine confirms that the nominated property, Saint Hilarion Monastery/Tell Umm Amer, is protected under the Decree Law concerning Tangible Cultural Heritage in Palestine, issued in 2018. This legislation provides comprehensive legal protection and management, aligned with international best practices. The Decree Law concerning Tangible Cultural Heritage repeals previous laws, as stated in Article 78 of the decree law, significantly enhancing the scope of heritage management and protection within the State of Palestine. The State of Palestine reaffirms its commitment to these standards, ensuring the effective conservation, management, and protection of its tangible cultural heritage.